

# COUNCIL AGENDA

(Extraordinary Council Meeting)

Monday 19 March 2012







The Mayor (Councillor Frances Stainton)  
Deputy Mayor (Councillor Belinda Donovan)

ADDISON

Alex Chalk (C)  
Belinda Donovan (C)  
Peter Tobias (C)

HAMMERSMITH  
BROADWAY

Michael Cartwright (L)  
Stephen Cowan (L)  
PJ Murphy (L)

RAVENSCOURT PARK

Charlie Dewhirst (C)  
Lucy Ivimy (C)  
Harry Phibbs (C)

ASKEW

Lisa Homan (L)  
Caroline Needham (L)  
Rory Vaughan (L)

MUNSTER

Michael Adam (C)  
Adronie Alford (C)  
Alex Karmel (C)

SANDS END

Steve Hamilton (C)  
Ali de Lisle (C)  
Jane Law (C)

AVONMORE &  
BROOK GREEN

Helen Binmore (C)  
Joe Carlebach (C)  
Robert Iggulden (C)

NORTH END

Daryl Brown (L)  
Georgie Cooney (C)  
Tom Crofts (C)

SHEPHERDS BUSH  
GREEN

Iain Coleman (L)  
Andrew Jones (L)  
Mercy Umeh (L)

COLLEGE PARK &  
OLD OAK

Elaine Chumnerly (L)  
Wesley Harcourt (L)

PALACE RIVERSIDE

Marcus Ginn (C)  
Donald Johnson (C)

TOWN

Oliver Craig (C)  
Stephen Greenhalgh (C)  
Greg Smith (C)

FULHAM BROADWAY

Victoria Brocklebank-  
Fowler (C)  
Rachel Ford (C)  
Matt Thorley (C)

PARSONS GREEN AND  
WALHAM

Nicholas Botterill (C)  
Mark Loveday (C)  
Frances Stainton (C)

WORMHOLT AND  
WHITE CITY

Colin Aherne (L)  
Jean Campbell (L)  
Dame Sally Powell (L)

FULHAM REACH

Gavin Donovan (C)  
Peter Graham (C)  
Andrew Johnson (C)



# SUMMONS

Councillors of the London Borough of  
Hammersmith & Fulham  
are requested to attend the  
Meeting of the Council on  
Monday 19 March 2012  
at Hammersmith Town Hall, W6

The Council will meet at 7.00pm.

09 March 2012  
Town Hall  
Hammersmith W6

Derek Myers  
Chief Executive

# Full Council Agenda

19 March 2012

<u>Item</u>		<u>Pages</u>
<b>1.</b>	<b>MINUTES</b>	1040 - 1052
	To approve and sign as an accurate record the Minutes of the Budget Council Meeting held on 29 February 2012.	
<b>2.</b>	<b>APOLOGIES FOR ABSENCE</b>	
<b>3.</b>	<b>MAYOR'S/CHIEF EXECUTIVE'S ANNOUNCEMENTS (IF ANY)</b>	
<b>4.</b>	<b>DECLARATIONS OF INTERESTS</b>	
	If a Councillor has any prejudicial or personal interest in a particular report he/she should declare the existence and nature of the interest at the commencement of the consideration of the item or as soon as it becomes apparent.	
	At meetings where members of the public are allowed to be in attendance and speak, any Councillor with a prejudicial interest may also make representations, give evidence or answer questions about the matter. The Councillor must then withdraw immediately from the meeting before the matter is discussed and any vote taken, unless a dispensation has been obtained from the Standards Committee.	
	Where members of the public are not allowed to be in attendance, then the Councillor with a prejudicial interest should withdraw from the meeting whilst the matter is under consideration, unless the disability has been removed by the Standards Committee.	
<b>5.</b>	<b>ITEMS FOR DISCUSSION/COMMITTEE REPORTS</b>	
<b>5.1</b>	<b>EARLS COURT AND WEST KENSINGTON OPPORTUNITY AREA - SUPPLEMENTARY PLANNING DOCUMENT (SPD)</b>	1053 - 1592
<b>6.</b>	<b>SPECIAL MOTIONS</b>	
	To consider and determine any Special Motions:	
<b>6.1</b>	<b>SPECIAL MOTION 1 - BORIS/BARCLAYS BANK BIKES</b>	1593

**7. INFORMATION REPORTS - TO NOTE**

There are no information reports to consider.

# COUNCIL MINUTES

(BUDGET COUNCIL MEETING)

WEDNESDAY 29 FEBRUARY 2012





## PRESENT

The Mayor Councillor Frances Stainton  
Deputy Mayor Councillor Belinda Donovan

### Councillors:

Colin Aherne	Charlie Dewhirst	Andrew Jones
Helen Binmore	Gavin Donovan	Alex Karmel
Nicholas Botterill	Rachel Ford	Mark Loveday
Victoria Brocklebank-Fowler	Marcus Ginn	PJ Murphy
Daryl Brown	Peter Graham	Caroline Needham
Joe Carlebach	Stephen Greenhalgh	Harry Phibbs
Michael Cartwright	Steve Hamilton	Sally Powell
Elaine Chumnerly	Wesley Harcourt	Greg Smith
Iain Coleman	Lisa Homan	Matt Thorley
Georgie Cooney	Robert Iggulden	Peter Tobias
Stephen Cowan	Lucy Ivimy	Mercy Umeh
Oliver Craig	Andrew Johnson	Rory Vaughan
Tom Crofts	Donald Johnson	

### **33. MINUTES**

The minutes of the Ordinary Council Meeting held on 25 January 2012 were confirmed and signed as an accurate record.

### **34. APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Michael Adam, Adronie Alford, Jean Campbell, Alex Chalk, Ali de Lisle and Jane Law. Apologies for lateness were received from Councillor Matt Thorley.

### **35. MAYOR'S/CHIEF EXECUTIVE'S ANNOUNCEMENTS (IF ANY)**

The Mayor's Announcements were circulated and tabled at the meeting. (Copy attached as **Appendix 1** to these minutes).

The Mayor announced with great sadness the death of Mr John Barker, who served as consort to former Councillor and former Mayor, Mrs Val Barker.

The Mayor congratulated Councillor Jane Law and Councillor Alex Karmel on the birth of their daughter, Poppy.

**36. DECLARATIONS OF INTERESTS**

Councillor Wesley Harcourt declared a personal interest in agenda item 6.1 - Revenue Budget and Council Tax Levels 2012/13, in relation to the third sector grants referred to on pages 936 and 937 of the report, as his full time job was funded by London Councils and some of the organisations funded were members of the organisation he worked for.

The Mayor advised Councillors that, in relation to agenda item 6.4 – Councillors' Allowances Scheme: Annual Review and Revision, the Standards Board had advised that it was necessary for all Councillors to declare their allowances as personal interests under the Code of Conduct. In order to manage this with the minimum of disruption, all Councillors present in the Chamber would be deemed as having declared a personal interest in this item (unless the Councillor objects), and this fact would be duly noted and recorded in the minutes. This was agreed unanimously.

**37. PUBLIC QUESTIONS**

There were no public questions.

**38. ITEMS FOR DISCUSSION/COMMITTEE REPORTS**

**38.1 Revenue Budget and Council Tax Levels 2012/13**

7.05pm - The report and recommendations were moved for adoption by the Leader of the Council, Councillor Stephen Greenhalgh.

In accordance with Council convention, the Leader of the Council, Councillor Stephen Greenhalgh, and the Leader of the Opposition, Councillor Stephen Cowan, were then given unlimited time to speak on the Budget report. Speeches on the report were made by Councillors Helen Binmore and Joe Carlebach (for the Administration) and Councillors Andrew Jones and Caroline Needham (for the Opposition).

Councillor Stephen Greenhalgh (for the Administration) made a speech winding up the debate. The report and recommendations were put to the vote and a roll-call was requested:

FOR	AGAINST	NON VOTING
BINMORE	BROWN	AHERNE
BOTTERILL		CARTWRIGHT
BROCKLEBANK-FOWLER		CHUMNERY
CARLEBACH		COLEMAN
COONEY		COWAN
CRAIG		HARCOURT
CROFTS		HOMAN
DEWHIRST		JONES
DONOVAN (B)		MURPHY
DONOVAN (G)		NEEDHAM
FORD		POWELL
GINN		UMEH
GRAHAM		VAUGHAN
GREENHALGH		
HAMILTON		
IGGULDEN		
IVIMY		
JOHNSON (A)		
JOHNSON (D)		
KARMEL		
LOVEDAY		
PHIBBS		
SMITH		
STANTON		
TOBIAS		

FOR	25
AGAINST	1
NON VOTING	13

The report and recommendations were declared **CARRIED.**

8.29 pm - **RESOLVED:**

- (1) To note the Council Tax reduction of 3.75% for the Hammersmith & Fulham element for 2012/13. For planning purposes, there will be a freeze on Council Tax for 2013/14 and 2014/15.
- (2) The Council Tax be set for 2012/13 for each category of dwelling, as calculated in accordance with Sections 31A to 49B of the Localism Act 2011, as outlined below and in full in Appendix A of the report:
  - (a) The element of Council Tax charged for Hammersmith & Fulham Council will be £781.34 per Band D property in 2012/13.
  - (b) The element of Council Tax charged by the Greater London Authority is £306.72 per Band D property in 2012/13. A reduction of 1%.

- (c) The overall Council Tax to be set will be £1088.06 per Band D property in 2012/13.

Category of Dwelling	A	B	C	D	E	F	G	H
Ratio	6/9 £	7/9 £	8/9 £	1 £	11/9 £	13/9 £	15/9 £	18/9 £
A) H&F	520.89	607.71	694.52	781.34	954.97	1,128.60	1,302.23	1,562.68
b)GLA	204.48	238.56	272.64	306.72	374.88	443.04	511.20	613.44
<b>c)Total</b>	<b>725.37</b>	<b>846.27</b>	<b>967.16</b>	<b>1,088.06</b>	<b>1,329.85</b>	<b>1,571.64</b>	<b>1,813.43</b>	<b>2,176.12</b>

- (3) The Council's own total net expenditure budget for 2012/13 is set at £200.82m.
- (4) That fees and charges are approved as set out in paragraph 4.2 of the report.
- (5) That the Executive Director of Finance and Corporate Governances' budget projections to 2014/15 be noted.
- (6) That the Executive Director of Finance and Corporate Governances' statements under Section 25 of the Local Government Act 2003 regarding the adequacy of reserves and robustness of estimates be noted (section 13).
- (7) That the Executive Director of Finance and Corporate Governance be authorised to collect and recover National Non-Domestic Rate and Council Tax in accordance with the Local Government Finance Act 1988 (as amended), the Local Government Finance Act 1992 and the Council Schemes of Delegation.
- (8) That all Chief Officers be required to report monthly on their projected financial position compared to their revenue estimates (as part of the Corporate Monitoring Report).
- (9) That all Chief Officers be authorised to implement their service spending plans for 2012/13 in accordance with the recommendations within this report and the Council's Standing Orders, Financial Regulations and relevant Schemes of Delegation.
- (10) Members attention is drawn to S106 of the Local Government Finance Act 1992 which requires any Member who is two months or more in arrears on their Council Tax to declare their position and not to vote on any issue that could affect the calculation of the budget or Council Tax.

The Mayor reminded Members who came in late to make individual Declarations of Interest in relation to agenda item 6.4 – Councillors' Allowances Scheme: Annual Review and Revision.

## 38.2 Capital Programme 2012/13 to 2016/17

8.30pm - The report and recommendations were moved for adoption by the Leader of the Council, Councillor Stephen Greenhalgh.

Speeches on the report were made by Councillors Lisa Homan and Stephen Cowan (for the Opposition) and Councillor Stephen Greenhalgh (for the Administration).

The report and recommendations were put to the vote:

FOR	25
AGAINST	13
NON VOTING	0

The report and recommendations were declared **CARRIED.**

8.44pm - **RESOLVED:**

- (1) To approve the General Fund Capital Programme budget at £72.722m for 2012/13.
- (2) To approve a Debt Reduction target of £44.1m by 2016/17 (since 2011/12) which will reduce underlying debt - as measured by the Capital Financing Requirement - to £77.7m.
- (3) To approve that 25% of receipts generated for the decent neighbourhoods programme continue to be used to support general capital investment in 2012/13.
- (4) To approve the following initiatives within the capital programme (Table 4 of the report):
  - The continuation of the rolling programmes for repairs to Carriageways and Footways £2.1m;
  - Corporate Planned Maintenance £2.5m;
  - Private Sector Housing Grants £0.45m;
  - Parks Improvements £0.5m;
  - Contributions to the Invest to Save Fund £0.75m; and
  - The Re-provision of Services from Sands End Community Centre £0.22m.This totals £6.52m.
- (5) To note and approve the level of resource forecast (Table 2 of the report) and indicative expenditure budget 2012/13 of £13.043m for the Decent Neighbourhoods programme as detailed in Appendix 1 of the report; and 2012/13 contribution to fund works to the HRA stock of £8.82m from the Decent Neighbourhoods Pot (schemes under consideration).
- (6) To note the 2012/13 HRA capital programme of £37.42m as set out in Table 6 of the report.

- (7) To approve the following annual Minimum Revenue Provision (Appendix 5 of the report).
- For debt which is supported through Formula Grant this authority will calculate the Minimum Revenue Provision in accordance with current regulations (namely 4% of the Capital Financing requirement net of adjustment A).
  - For debt which has arisen through prudential borrowing it should be written down in equal instalments over the estimated asset life. The debt write-off will commence the year after an asset comes into use.
- (8) To approve the prudential indicators as set out in Appendix 6 of the report.

### 38.3 Treasury Management Strategy Report

8.45pm - The report and recommendations were moved for adoption by the Leader of the Council, Councillor Stephen Greenhalgh.

The report and recommendations were put to the vote:

FOR	26
AGAINST	0
NON VOTING	11

The report and recommendations were declared **CARRIED.**

8.45pm - **RESOLVED:**

- (1) To approve the future borrowing and investment strategies and authorise the Executive Director of Finance and Corporate Governance to arrange the Council's cashflow, borrowing and investments in 2012/13.
- (2) In relation to the Council's overall borrowing for the financial year 2012/13, approve the Prudential Indicators as set out in Section 3 of the report.
- (3) To agree the changes to the Treasury Management Policy Statement and the Treasury Management Practices as explained in section 1 of the report and reproduced in Appendices A and B of the report.
- (4) To move to a separate HRA and General Fund debt pool with effect from 1 April 2012.
- (5) To pay the HRA investment income on unapplied HRA receipts and other HRA cash balances calculated at the average rate of interest earned on temporary investments with effect from 1 April 2012.

#### 38.4 Councillors' Allowances Scheme: Annual Review and Revision

8.46pm - The report and recommendations were moved for adoption by the Leader of the Council, Councillor Stephen Greenhalgh.

Speeches on the report were made by Councillor Lisa Homan (for the Opposition) and Councillor Mark Loveday (for the Administration).

The report and recommendations were put to the vote:

FOR	26
AGAINST	0
NON VOTING	12

The report and recommendations were declared **CARRIED**.

8.52pm - **RESOLVED:**

- (1) That the revision to the Councillors' Allowance Scheme for 2011/12 as set out in paragraph 1.3 of the report and Appendix 1 be approved.
- (2) That the Councillors' Allowances Scheme 2012 – 13 as set out in the report, be adopted.

#### 38.5 Pay Policy of the London Borough of Hammersmith and Fulham

8.53pm - The report and recommendations were moved for adoption by the Leader of the Council, Councillor Stephen Greenhalgh.

Under Council Procedure Rule 13.2 (b), Councillor PJ Murphy moved, seconded by Councillor Andrew Jones, an amendment to the report as follows:

“This council is committed to full cost transparency wherever possible to enable tax payers to hold us to account. This council notes that it has employed 540 agency workers over the past year - 20% of the directly employed workforce.

This council has also employed sixty nine consultants, with almost twenty of those employees working via service limited companies. The Local Government Pension Scheme forbids retired local government employees from being re-employed in local government. However, a personal service limited company allows this rule to be side-stepped.

However, there are clear rules Laid Down by Her Majesty's Revenue and Customs about what defines a consultant and there is a likelihood that the London Borough of Hammersmith and Fulham may have breached those rules in directly employing people to work in its management structure as “consultants” via personal service companies.

This Council therefore resolves to add the following provisions to the policy:-

1. To inform HMRC of all cases where it has employed individuals via personal service companies and ensure its tax obligations are met and up to date
2. To report to Cabinet and Audit and pensions Committee full details of any back-taxes and fines issued by HMRC on IR35
3. To review its use of agency workers looking for more cost effective means of employing individuals and to publish all details of agency workers employed by LBHF and/or its subsidiaries and detail the salaries of all of those over £100,000.00 per year.”

Speeches on the amendment were made by Councillors PJ Murphy, Andrew Jones and Stephen Cowan (for the Opposition) and Councillors Nicholas Botterill and Stephen Greenhalgh (for the Administration). The amendment was put to the vote and a roll-call was requested:

FOR	AGAINST	NON VOTING
AHERNE	BINMORE	
BROWN	BOTTERILL	
CARTWRIGHT	BROCKLEBANK-FOWLER	
CHUMNERY	CARLEBACH	
COWAN	COONEY	
HARCOURT	CRAIG	
HOMAN	CROFTS	
JONES	DEWHIRST	
MURPHY	DONOVAN (B)	
NEEDHAM	DONOVAN (G)	
UMEH	FORD	
VAUGHAN	GINN	
	GRAHAM	
	GREENHALGH	
	HAMILTON	
	IGGULDEN	
	IVIMY	
	JOHNSON (A)	
	JOHNSON (D)	
	KARMEL	
	LOVEDAY	
	PHIBBS	
	SMITH	
	STANTON	
	THORLEY	
	TOBIAS	
FOR	12	
AGAINST	26	
NON VOTING	0	

The amendment was declared **LOST.**



The report and recommendations were put to the vote:

FOR	26
AGAINST	12
NOT VOTING	0

The report and recommendations were declared **CARRIED.**

9.18pm - **RESOLVED:**

- (1) That the Pay Policy attached at Appendix 1 of the report be approved and the pay schemes attached at Appendices 2, 3 and 4 be endorsed. The Council's Pensions Policy is attached for information at Appendix 5.
- (2) That the Councillors' Allowances report approved earlier in the meeting be constituted as Appendix 6 of this report.

### 38.6 Interim Director of Legal Services

9.19pm - The report and recommendations were moved for adoption by the Leader of the Council, Councillor Stephen Greenhalgh.

The report and recommendations were put to the vote.

FOR	Unanimous
AGAINST	0
NON VOTING	0

The report and recommendations were declared **CARRIED.**

9.20pm - **RESOLVED:**

- (1) That Janette Mullins, Head of Litigation, be appointed Monitoring Officer from 1 April 2012 until the new Bi-Borough Director of Legal Services takes up their appointment.
- (2) That the interim management arrangements for Legal and Democratic Services be noted.

### 39. **INFORMATION REPORTS - TO NOTE**

There were no information reports to this meeting of the Council.

\* \* \* \* \* CONCLUSION OF BUSINESS \* \* \* \* \*

Meeting started: 7.00 pm  
Meeting ended: 9.20 pm

Mayor .....

**ANNOUNCEMENTS BY  
THE MAYOR**

1. I am sure everyone shares my sadness to hear of the death of Mr John Barker on 24<sup>th</sup> February 2012. Mr Barker served as consort to former Cllr and former Mayor, Mrs Val Barker. (April and May 1990, and 1997 – 1998).  
The funeral service will take place on Thursday 8<sup>th</sup> March at 10.40am, Mortlake Crematorium, Kew Meadow Path, Townmead Road, Richmond, TW9 4EN.
2. On 26<sup>th</sup> January 2012, I was delighted to speak at and formally open the St George's 'Jobs Fair' event, Imperial Wharf, SW6
3. On 27<sup>th</sup> January, I attended India Republic Day reception, Sheraton Park Lane Hotel, W1J
4. On 30<sup>th</sup> January, I attended and spoke at the Collation & Induction of Canon Guy Wilkinson and the Licensing of The Rev'd Dr Lincoln Harvey, St Andrew's Church, Fulham Fields, W14
5. On 31<sup>st</sup> January, accompanied by Alderman Gordon Haines, I attended the Year of the Dragon celebration event, Banqueting Hall, Whitehall, SW1A
6. On 2<sup>nd</sup> February, I attended and spoke at the Partners Club, Haberdashers Hall.
7. On 3<sup>rd</sup> February, I was delighted to host a reception and present a plaque to Steve Lumb, London Fire Brigade, Borough Commander, Hammersmith & Fulham to acknowledge his achievement in reducing the number of fires and deaths in the borough since his appointment in 2002, Mayor's Parlour, HTH.
8. On 3<sup>rd</sup> February, I welcomed Wilbur Ramirez to the parlour and attended Serco's photocall to congratulate Wilbur on his participation in 'The Toughest Place to be a Binman' programme which was screened on BBC2. I also encouraged his splendid intention to start a fund to help educate the Jakarta colleagues' children who virtually live on the dust heap.
9. On 6<sup>th</sup> February, accompanied by my Mayoress, I attended RB Kingston Diamond Jubilee Civic Service, in the presence of HRH Princess Alexandra, St Luke's Church, Kingston Upon Thames
10. On 7<sup>th</sup> February, I attended, presented winning medals and congratulated the H&F schools at the Skittle ball competition, Assembly Hall, HTH.
11. On 8<sup>th</sup> February, I hosted afternoon tea for pupils from St Thomas's School, Fulham, Mayor's Parlour, HTH
12. On 8<sup>th</sup> February, I attended and spoke at the Launch of Creative Minds event, HTH.

13. On 9<sup>th</sup> February, accompanied by my Consorts, I hosted and presented medals to Albert & Friends, Easigrass, representatives from Walking with the Wounded, and several volunteers, who took part in the New Years Day Parade 2012, HTH
14. On 10<sup>th</sup> February, I attended the Speaker of Hackney's Charity Dinner event, Premier Inn Hotel, City Road, N1
15. On 11<sup>th</sup> February, I attended and spoke at the Kosovo's Independence Day reception, HTH
16. On 13<sup>th</sup> February, I attended the Mayor of Havering's charity event 'On a Wing and a Prayer', Queens Theatre, Hornchurch
17. On 14<sup>th</sup> February, accompanied by Mrs Priscilla Ladha, I attended the National Day and the Armed Forces Day Reception, 28 Belgrave Square SW1X
18. On 15<sup>th</sup> February, I was delighted to attend and speak at the Elgin Close Resource Centre Open Day, 1- 3 Elgin Close, Goldhawk Road, Shepherds Bush Road W12
19. On 16<sup>th</sup> February, I was honoured to receive HRH Princess Anne to the Borough, as Patron of the Citizen Advice Bureau, Uxbridge Road, W12
20. On 17<sup>th</sup> February, accompanied by Lindsay Stainton, I attended the 4<sup>th</sup> Anniversary of the Declaration of Independence of the Republic of Kosovo, The Corinthia Hotel, Whitehall Place, London SW1A
21. On 18<sup>th</sup> February, I attended LMA Annual Dinner, Corinthia Hotel, Whitehall Place, SW1A 2BD
22. On 20<sup>th</sup> February, I attended and presented certificates and congratulated the winners on their remarkably mature speeches, UK Youth Parliament Elections, HTH
23. On 21<sup>st</sup> February, I attended Balfour Beatty Youth Games 'Building A Legacy' reception, Riverbank Park Plaza Hotel, Albert Embankment, SE1
24. On 21<sup>st</sup> February, I attended the 'Army Today Presentation' evening, HTH
25. On 22<sup>nd</sup> February, accompanied by Mrs Priscilla Ladha, I attended and awarded the prizes to the winners of the 'Chef of the Year' congratulating them on their very professional presentations, Ealing, Hammersmith and West London College, Gliddon Road, W14
26. On 23<sup>rd</sup> February, I attended HE Ambassador of Kuwait reception, Dorchester Hotel, W1

27. On 24<sup>th</sup> February, I attended and presented an award to the winners of the Hammersmith London Christmas Choir Competition, where I congratulated pupils on their beautiful singing in Latin, Larmenier and Sacred Heart School, Presentation Assembly, Brook Green, W6
28. On 24<sup>th</sup> February, I attended Wates Construction 'Ground Breaking Ceremony' Hammersmith Grove, W6 where I was happy to see this long awaited empty space now finally achieving an agreed project.
29. On 24<sup>th</sup> February, I was honoured to attend and speak at the late Sam Alexander MC, Charity Dinner fundraising evening, Linden House, W6
30. On 27<sup>th</sup> February, I was delighted to accept the Safer Parks Awards award, for Normand Park and Brook Green, achieving two silver for H & F and one shared gold with RBKC for Little Wormwood Scrubs, held at City Hall, SE1
31. On 27<sup>th</sup> February, I attended, spoke and formally opened the Greenside Primary School Diamond Jubilee Learning Garden, Greenside School, W12



## Report to Council

19<sup>th</sup> March 2012

### LEADER

*Councillor Stephen Greenhalgh*

### EARL'S COURT AND WEST KENSINGTON OPPORTUNITY AREA JOINT SUPPLEMENTARY PLANNING DOCUMENT

**WARDS  
North End  
and Fulham  
Broadway**

This report seeks a resolution to adopt the Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document as a Supplementary Planning Document (SPD) to the Council's Core Strategy (2011).

Attached to the report is (Appendix 1) the SPD; (Appendix 2) a summary of the main issues raised in the representations received during the statutory public consultation period that took place between 11 November and 23<sup>rd</sup> December 2011; (Appendix 3) a tracked version of the SPD highlighting changes made to the document in response to the comments received during the consultation exercise; (Appendix 4) the Equalities Impact Assessment report; and (Appendix 5) the Estates Regeneration Economic Appraisal: Response to Comments.

### CONTRIBUTORS

EDFCG  
ADLDS  
TTS

### Recommendation

**That Full Council resolve to adopt the Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document (Appendix 1).**

**HAS A EIA  
BEEN COMPLETED**

**YES**

## **1. BACKGROUND**

- 1.1. The purpose of the Earl's Court West Kensington Opportunity Area (hereafter referred to as 'the Opportunity Area') Joint Supplementary Planning Document (SPD) is to provide planning guidance related to the policies set out in the LBHF's Core Strategy (2011), RBKC's Core Strategy (2010) and the London Plan (2011). LBHF, RBKC and GLA have been working in partnership to develop the SPD for the Opportunity Area. On completion of the process it is anticipated that along with LBHF adopting the SPD, the Mayor would publish the document as Supplementary Planning Guidance (SPG) to the London Plan and RBKC would adopt it as a SPD to their Core Strategy. As SPG/SPD the document will be a material planning consideration when determining planning applications in the area.
- 1.2 The Opportunity Area is identified in the Core Strategy (2011) for potential major residential-led mixed use regeneration. The core development area lies between Warwick Road and the West London Line to the east, West Cromwell Road (A4) to the north, North End Road to the west and Old Brompton Road/Lillie Road to the south and covers the Earl's Court Exhibition Centres (owned on long lease by Capital and Counties), the TFL Depot (freehold of TfL), the Empress State building (freehold of Capital and Counties) and the West Kensington and Gibbs Green estates (freehold of LBHF). Seagrave Road car park (owned on long lease by Capital and Counties) is also within the Opportunity Area, situated south of Lillie Road and bounded by Seagrave Road and the West London Line (See Appendix 1).
- 1.3 LBHF's Core Strategy (2011) indicates the potential for an indicative 2,900 additional homes and 5,000 to 6,000 new jobs in LBHF. The London Plan (2011) indicates the potential for 4,000 additional homes and 7,000 new jobs across both LBHF and RBKC.

## **2. SUMMARY OF KEY ELEMENTS OF THE SPD**

- 2.1 The SPD is split into 13 chapters. Chapters 1 and 2 set out the context for the Opportunity Area. The content of the other 11 chapters is set out in more detail below:

### **Vision and Objectives**

- Sets out the vision and the key objectives for the SPD, as well as including key images such as an illustrative urban form plan, an illustrative land use plan and an illustrative masterplan.

### **Urban Form Strategy**

- Sets out six 'Key Objectives' which any development proposals would be expected to satisfy, largely addressing the following themes; Connectivity, Urban Grain, Public Open Space, Edges, Skyline and Streets. These are supported by a number of Key Principles and further reasons and justification guiding the ways in which the authorities would like to see these Key Objectives delivered.

- The Key Objectives on Edges, Skyline and Streets all address the potential heights of proposed buildings. They are accompanied by two SPD supporting evidence documents; one on the existing edge conditions and one on townscape and views analysis.

### **Housing Strategy**

- This chapter sets out the housing requirements in relation to estate redevelopment, affordable housing, housing mix, housing size, housing space and amenity space.
- The Housing Strategy sets out an expectation that any comprehensive approach to redevelopment of the Opportunity Area should include the West Kensington and Gibbs Green estates. This position is accompanied by the Estates Regeneration Economic Appraisal supporting evidence document.
- The Strategy reflects LBHF's Core Strategy by requiring 40% of housing in the Opportunity Area to be affordable, with the priority within this to be the replacement of the existing housing, resulting from the redevelopment of the West Kensington and Gibbs Green estates.
- The strategy also requires 25% of any housing on Seagrave Road to be social rented in order to facilitate any phased development of the estates.

### **Employment Strategy**

- This Employment Strategy focuses specifically on the provision of a suitable quantity and variety of business floorspace as this is likely to make the greatest contribution to the minimum new jobs target of 7,000.
- The strategy also sets out the authorities' strategy for securing employment and training across all employment sectors.

### **Retail Strategy**

- This chapter sets out the requirements for the location, capacity and type of retail provision in the Opportunity Area.
- The strategy sets out an expectation that retail should be located around existing centres, transport hubs and a new centre within the Opportunity Area.

### **Culture Strategy**

- Sets out requirements to create a cultural destination comprising of cultural facilities; associated uses, including artists' studios and space for creative industries, public art and hotels.

### **Social Infrastructure Strategy**

- Sets out the requirements for the type, quantum and broad locations for the provision of social and community facilities necessary to support the comprehensive redevelopment of the Opportunity Area, setting out the requirements that a developer would need to satisfy in relation to the provision

of education facilities (nursery, primary and secondary), health facilities, sports and leisure facilities, police facilities and community and library facilities.

#### **Transport and Accessibility Strategy**

- Sets out what improvements to the transport network will be necessary to accommodate development. These include improvements to the public realm, improved cycle facilities and increased capacity on the public transport and road networks.
- The chapter assesses a development scenario of 5,560 residential units and 12,165 jobs.
- The Strategy has been informed by a Strategic Transport Study.

#### **Energy Strategy**

- Sets out requirements to ensure that development in the Opportunity Area adopts an energy strategy that reduces carbon dioxide emissions.

#### **Environmental Strategy**

- The strategy sets out requirements to ensure that development in the Opportunity Area addresses any impact on the environment, including the consideration of climate change, water management, waste, construction and demolition, ecology and air and noise/vibration pollution.

#### **Phasing and Section 106 Strategy**

- Outlines the key Section 106 requirements that would need to be negotiated for as part of any planning agreement associated with any development in the Opportunity Area.
- Includes a key objective that seeks to ensure a comprehensive approach to regeneration of the Opportunity and a key principle that looks to use planning obligations to ensure a comprehensive approach to regeneration of the Opportunity Area.

2.2 A number of supporting evidence documents have been produced in order to inform this SPD. A summary of each document is provided below:

**Sustainability Appraisal.** Assesses the potential impacts of the document on a range of environmental, social and economic criteria.

**Equality Impact Assessment (Appendix 4).** Assesses the potential impacts of the document on a number of identified minority groups.

**Statement of Consultation.** A statement setting out those consulted by the authorities in connection with the preparation of the SPD, how the consultations were carried out, a summary of the main issues raised in those consultations (“the Consultation Summary Report”) and how the representations have been addressed in the SPD (“the Consultation Responses Schedule”)



**Consultation Summary Report (Appendix 2).** Provides a summary of the comments raised during consultation on the revised draft of the SPD.

**Consultation Responses Schedule.** Sets out the comments received during consultation on the revised draft of the SPD and the officers' responses to these comments.

**Character Area Analysis.** Is a study of the local urban character of the OA and its surroundings.

**Townscape and Visual Analysis.** Is a study of the physical fabric of the area and townscape through the analysis of existing views towards the OA from observation points around the OA. The analysis assesses the setting of existing Conservation Areas' skylines through an eye level visual assessment that identifies the key attributes and features in each view.

**Edges Study .** Is a study of the existing OA boundary edge conditions between the OA and properties which share its boundary.

**Development Capacity Scenarios.** Sets out the three development capacity scenarios that were published in the first draft SPD. An illustrative Masterplan is provided for each and they are tested against the revised Key Objectives. They are followed by an alternative illustrative masterplan solution demonstrating a different approach to urban design that has the potential to meet all of the Key Objectives. Any masterplan images in this, or any other SPD document, do not and will not fix a design form and layout for the OA.

**Earl's Court and West Kensington Opportunity Area Office Study (2011).** Explores the potential for office floorspace within the OA.

**Earl's Court and West Kensington Opportunity Area Retail Need Assessment (2010).** Provides an assessment of retail need in the OA, looking specifically at retail capacity.

**Earl's Court and West Kensington Opportunity Area Ecological Aspirations Study (2010).** Assesses the ecological and habitat value of the OA and sets out several aspirations to protect and enhance ecology and habitat diversity in the OA.

**Decentralised Energy Feasibility Study (2011).** This sets out the potential for decentralised energy in the OA and sets out the strategic framework for the development of a site-wide, low carbon, decentralised energy scheme in the OA.

**Estates Regeneration Economic Appraisal (2011).** Provides a summary of the four options for intervention on the West Kensington and Gibbs Green estates.

**Transport Study Review (2011).** This Summary Report outlines the findings of the Earl's Court & West Kensington Strategic Transport Study (ECTS) and the independent review carried out by, and on behalf of TfL, LBHF and RBKC. The purpose of the review is to ensure that the ECTS and underlying analysis is acceptable to inform the SPD.

**Viability Review (2011).** Is a review that assessed the three development capacity scenarios (see para 1.47 above and assesses the viability of development at these three densities. The study was only accurate at the time it was undertaken in 2011 and any applications for development would need to be accompanied by their own viability assessments.

### **3. SUMMARY OF CONSULTATION PROCESS**

- 3.1 The SPD has been consulted on a total of three times. Preliminary consultation was undertaken in October-November 2010. Following this, the first Draft SPD was produced and consulted on in March-April 2011. The authorities received 83 written responses to this consultation, which were broken down into 1,295 separate comments. These comments were considered and responded to and informed the drafting of the Revised Draft SPD, which underwent consultation in November-December 2011. Several consultation techniques were used to engage the public and interested parties and encourage feedback, namely;
- Consultation letter distributed to surrounding properties and interested parties;
  - Public notice in local newspapers;
  - SPD Distribution to interested parties (both hardcopy and CD formats);
  - Availability of the SPD for inspection at several public locations;
  - 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.
- 3.2 335 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 3,788 separate comments.
- 3.3 The responses to the Revised Draft of the SPD have been considered and where appropriate, they have informed the production of the final SPD (see Appendix 3 for the changes made to the SPD). A summary of the consultation responses is appended to this report (Appendix 2).

#### 4. KEY ISSUES ARISING FROM CONSULTATION AND AMENDMENTS MADE TO THE SPD IN RESPONSE

- **SPD or Area Action Plan?**

A number of consultees have stated that the council and all three authorities involved in the preparation of the SPD should have produced an Area Action Plan (AAP) for the area rather than an SPD and that the document is in effect an AAP.

Officers (together with colleagues from the other authorities) consider that an AAP is not necessary as up to date strategic policies for the Opportunity Area are already set out in the London Plan and Borough Core Strategies. Officers consider that the document as an SPD is appropriate and consistent with Government Guidance set out in Planning Policy Statement 12. Officers have considered strategic policy FRA and strategic site policies FRA1 and FRA2 and form the view that the site allocation of the opportunity area and the level of detail in those policies are such that a supplementary planning document is sufficient in the circumstances.

- **Residential Density**

Consultees raised the need for residential density to be covered in the Housing chapter of the SPD. Both borough's Core Strategies reflect the Mayor's density policy (3.4).

Text has been inserted in the introduction text to the Housing chapter signposting London Plan Policy 3.4 but officers do not consider that the SPD should contain any further guidance on this subject.

- **Estate Regeneration**

A number of consultees objected to the council's position, as planning authority, that any comprehensive approach to redevelopment of the OA should include the West Kensington and Gibbs Green housing estates. Objections question the justification given in the Estates Regeneration Economic Appraisal.

Officers have requested that the company which carried out the appraisal consider the objections and provide a response. This is attached to the report at Appendix 5. In short, it concludes that redevelopment of the estates would improve the economic and social deprivation of the area and promote a more mixed and balanced community and that comprehensive redevelopment of the area is necessary to promote this objective, underlying in the council's core strategy and Government Guidance. Officers have considered these objections, the response provided and consider the evidence in support of

estate redevelopment outweighs the reasons given against estate redevelopment and that redevelopment of the estates as part of a comprehensive approach to redevelopment of the opportunity area is necessary in planning terms. Another principal concern about redevelopment of the estates relates to the disruption caused to residents during and phased redevelopment of the estates. Officers consider that Key Principle HO5 of the SPD is appropriately drafted to address their concerns and ensure that applications deal with any issues that may arise.

- **Impact on Views and Townscape**

A number of consultees raised concerns about the impact that the development will have on the local townscape, particularly when viewed from Brompton Cemetery and other surrounding Conservation Areas.

Officers have considered these concerns, but consider the 'Skyline' section of the Urban Form chapter of the SPD to be robust in this regard, as it sets out a framework that requires any application to demonstrate that it will preserve or enhance the character, appearance and setting of Brompton Cemetery and other surrounding Conservation Areas and to demonstrate that there will be no negative impact on any of the sensitive views identified in the Townscape and Visual Analysis SPD Supporting Evidence Document.

- **Building Heights**

Consultees also raised concerns about the general heights of buildings that may be acceptable in the OA.

In response to these concerns, Officers highlighted the fact that the SPD does not actually propose any specific building heights but rather establishes a framework against which the heights of any proposed buildings could be assessed. This framework includes Key Principles and further guidance on the impact on the local skyline, the design of buildings around the edges of the OA and the composition of streets within the OA. In response to observations made the Design Review Panel, the text on the design of tall buildings was strengthened.

- **Public Open Space**

A number of consultees questioned whether the SPD expects a sufficient amount of public open space to be delivered.

Officers have considered these representations, but consider the requirements set out in the SPD in this regard to be robust. The SPD requires any application for comprehensive redevelopment to include a 2 hectare local park and to

ensure that there is at least 10sqm of publicly accessible green open space per child. This is expected to be distributed in a manner which ensures that as many residential properties as possible are within a 100m walk of a publicly accessible open space.

- **Loss Of Exhibition Centres**

A number of representations were received from event organisers objecting to the redevelopment of the Earl's Court Exhibition Centres.

The exhibition centres are allocated for redevelopment in the Mayor's London Plan and the borough's Core Strategies. The SPD provides supplementary detail to these existing policies and any consideration towards the closure of the exhibition centres would have been considered at the examinations for the London Plan and Core Strategies and the inspector, having considered representations made at these examinations, has not amended or removed these site allocation policies.

- **Public Transport Capacity**

A number of consultees questioned whether the existing public transport networks, in particular the underground, could accommodate extra demand from development given the significant background growth forecast within the Strategic Transport Study.

A number of minor changes were made to the text and key principles to aid understanding and to clarify points that some consultees felt were unclear. Apart from these minor amendments the main findings and key principles of the Transport and Accessibility Strategy remained unchanged and require significant investment in the local transport infrastructure. The Strategic Transport Study that underpins the SPD is based on a robust methodology developed by Transport for London and used for other Opportunity Areas. The study was guided by the three authorities and has been independently audited. With the mitigations set out in the SPD there will be sufficient capacity to accommodate demand from development.

- **Road Network Capacity**

A number of consultees referred to existing areas of congestion on the local road network and questioned whether any demand from development could be accommodated.

A small number of minor changes were made to the text and key principles to aid understanding. The main findings and key principles of the Transport and Accessibility Strategy remained unchanged. The Strategic Transport Study that

underpins the SPD is based on a robust methodology developed by Transport for London and used for other Opportunity Areas. The study was guided by the three authorities and has been independently audited. In reporting the impacts on the road network the current areas of congestion have been highlighted. The Transport and Accessibility Strategy has set out those areas that will need to be addressed as part of any planning applications.

## **5. PROCESS**

- 5.1 Once adopted, the SPD must be made available during normal office hours, together with an adoption statement that specifies the date of adoption and that anyone with sufficient interest in the decision to adopt the SPD may apply, promptly and not later than 3 months after adoption, to the High Court for permission to apply for judicial review of the decision to adopt the SPD. We will also publish the SPD on the council's website and send the adoption statement to anyone who requested to be notified and everyone who has taken part in the consultation.

## **6. RISK MANAGEMENT**

- 6.1 The document has been signed off by senior officers at LBHF, RBKC and the GLA. However, the GLA and RBKC may decide not to adopt the SPD. Any decision by the GLA not to publish the document as a SPG or by RBKC not to adopt the SPD does not preclude the council from adopting the SPD nor does it mean that it should be given any less weight as a material consideration if the council decides to adopt it.
- 6.2 Should the Mayor of London decide to adopt the document as SPG to the London Plan, the document will be revised slightly to a) include his logo and name to the document; and the footnote referencing the document being an SPG subject to adoption will be removed (Page 8, paragraph 1.1 of the SPD).

## **7. EQUALITY IMPLICATIONS**

- 7.1 An Equality Impact Assessment (EIA or EQIA) has been prepared and is attached to this report (Appendix 4). The final EQIA sets out the key issues identified in the previous draft of the EQIA as a result of the consultation process and how these have been addressed through revisions to the final SPD.
- 7.2 Generally, development in accordance in the SPD would have a positive impact on those with protected characteristics, delivering benefits in terms of connectivity and permeability, access to services such as schools, health facilities and shops, employment and housing.
- 7.3 There are negative impacts on age, disability, pregnancy and maternity and race in relation to estate regeneration which are likely to result from the disruption caused through the re-housing process. Key Principle HO5 of the SPD requires any application involving the re-housing of residents from the

West Kensington and Gibbs Green estates to include a phasing strategy, which would need to set out mechanisms to ensure minimal disruption to residents. The EQIA also recommends that assistance is given to those residents during the removal process. There are also negative impacts as a result of the re-housing process moving residents further away from social and community facilities; however, it is acknowledged that all new facilities provided in the OA would need to be accessible to all and where existing facilities are not accessible to all, this would result in an improvement in access to facilities.

- 7.4 The EQIA identifies that any decision by the housing department to redevelop the estates or any proposals to relocate North End Road market, would need to undergo a separate EQIAs. Similarly, any planning application for planning permission to redevelop the estates would need to undergo an EQIA.

## **8. COMMENTS OF THE EXECUTIVE DIRECTOR OF FINANCE AND CORPORATE GOVERNANCE**

- 8.1. The adoption of this SPD may trigger blight. Blight indemnity will need to be put in place so as to ensure no financial burden on the council.

## **9. COMMENTS OF THE ASSISTANT DIRECTOR (LEGAL AND DEMOCRATIC SERVICES)**

- 9.1. Adopting the SPD will mean that the document is a material consideration to which regard will have to be had when considering any planning application in the SPD area.
- 9.2 The Planning and Compulsory Purchase Act 2004 (as amended) and The Town and Country Planning (Local Development Document) Regulations 2004 (as amended) require that the SPD be in conformity with the council's core strategy and in general conformity with the London Plan.
- 9.3 The requirements of The Town and Country Planning (Local Development Document) Regulations 2004 (as amended) in respect of consultation and finalising the SPD are explained in Section 3 of this report.
- 9.4 The post-adoption requirements are set out in Section 5 of this report.
- 9.5 The recent case of *Head v Eastbourne BC* [2009] UKUT 271 (LC) in the Lands Tribunal, has led to concern that the adoption of the SPD may give rise to the land affected by the SPD being considered as "blighted land" for the purposes of the Town and Country Planning Act 1990 (as amended). This may entitle some people living in the area to serve a notice on the council requiring it to compulsorily acquire their property in accordance with the provisions of the 1990 Act.
- 9.6 The council's statutory duty under the Equality Act 2010 is relevant. The protected characteristics to which the Public Sector Equality Duty ("PSED") applies now include age as well as the characteristics covered by the

previous equalities legislation applicable to public bodies (i.e. disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, sexual orientation, religion or belief and sex).

9.7 The PSED is set out in section 149 of the Equality Act 2010 (“the Act”) provides (so far as relevant) as follows:

(1) A public authority must, in the exercise of its functions, have due regard to the need to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

9.8 Case law has established the following principles relevant to compliance with the PSED which Council will need to consider:

(i) Compliance with the general equality duties is a matter of substance not form.

(ii) The duty to have "due regard" to the various identified "needs" in the relevant sections does not impose a duty to achieve results. It is a duty to have "due regard" to the "need" to achieve the identified goals.

(iii) Due regard is regard that is appropriate in all the circumstances, including the importance of the area of life of people affected by the decision and such countervailing factors as are relevant to the function that the decision-maker is performing.

(iv) The weight to be given to the countervailing factors is in principle a matter for the authority. However in the event of a legal challenge it is for the court to determine whether an authority has given “due regard” to the “needs” listed in s149. This will include the court assessing for itself whether in the circumstances appropriate weight has been given by the authority to those “needs” and not simply deciding whether the authority’s decision is a rational or reasonable one.



(v) The duty to have “due regard” to disability equality is particularly important where the decision will have a direct impact on disabled people. The same goes for other protected groups where they will be particularly and directly affected by a decision.

(v) The PSED does not impose a duty on public authorities to carry out a formal equalities impact assessment in all cases when carrying out their functions, but where a significant part of the lives of any protected group will be directly affected by a decision, a formal equalities impact assessment ("EQIA") is likely to be required by the courts as part of the duty to have 'due regard'. The EQIA is attached and will need to be read and taken into account in reaching a decision on the recommendations in the report. Additionally, the equality implications are summarised at paragraph 7 of the report.

(vii) The duty to have “due regard” will normally involve considering whether taking the particular decision would itself be compatible with the equality duty i.e. whether it will eliminate discrimination, promote equality of opportunity and foster good relations. Consideration must also be given to whether, if the decision is made to go ahead, it will be possible to mitigate any adverse impact on any particular protected group, or to take steps to promote equality of opportunity by, for example, treating a particular affected group more favourably.

**LOCAL GOVERNMENT ACT 2000**  
**LIST OF BACKGROUND PAPERS**

<b>No</b>	<b>Description of Background Papers</b>	<b>Name/ Ext of holder of file/ copy</b>	<b>Department/ Location</b>
1	Earl’s Court and West Kensington Opportunity Area Joint Supplementary Planning Document	Thomas Cardis Ext 3317	TTS
2.	Consultation Summary Report	Thomas Cardis Ext 3317	TTS
3.	Earl’s Court and West Kensington Opportunity Area Joint Supplementary Planning Document (tracked with changes post Regulation 17 Consultation)	Thomas Cardis Ext 3317	TTS
4.	Equality Impact Assessment	Thomas Cardis Ext 3317	TTS
5.	Estates Regeneration Economic Appraisal (2011) Response to Comments	Thomas Cardis Ext 3317	TTS
<b>Contact Officer</b>		<b>Name: Thomas Cardis Ext: 3317</b>	



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

March 2012



# Acknowledgements

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# Foreword

1



The Earl's Court and West Kensington Opportunity Area is one of the few remaining large development sites, close to central London, which has the potential to bring economic opportunity, new homes and new jobs on a grand scale.

The area has gone through significant change over the years. A collection of orchards and brickfields were replaced by a transport depot and coal yard. Then the area grew to become an internationally recognised exhibition venue, as well as home to over 1,500 people and an important element in London's transport infrastructure.

Over recent years the London Borough of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea and the Greater London Authority have come together to investigate the potential for the redevelopment of the Earl's Court Exhibition Centres. No one underestimates the contribution that the exhibition centres have made to the local economy; however, redevelopment could continue the Earl's Court 'brand' by creating a new vibrant cultural destination, as part of a new mixed use quarter which will provide new benefits to the local community, such as new businesses, shopping and employment opportunities.

Looking beyond the exhibition centres, in Hammersmith and Fulham the site of the Transport for London depot and the West Kensington and Gibbs Green housing estates offer huge potential for a comprehensive approach to redevelopment. This approach provides opportunities to re-house residents in better accommodation and build thousands of new homes, many of which will be affordable to those on low and middle incomes.

New infrastructure will be necessary to support the new population, including new roads, buses and improvements to the local stations, as well as a range of social and community facilities.

We have the chance to create a truly inspiring new urban quarter through the redevelopment of the Earl's Court and West Kensington Opportunity Area. Comprehensive redevelopment of the area presents a fantastic opportunity to improve connections between communities that are currently severed by the railway infrastructure and exhibition centres.

## Foreword

The challenge to developers is to create buildings and spaces which will stand the test of time. The area is surrounded by nineteen conservation areas, several important listed buildings and Brompton Cemetery, a Grade 1 listed historic park and Garden. We want to develop a quarter worthy of this setting.

This planning framework is a major step towards creating a successful new place in Earl's Court where people want to live, work and visit. We have therefore been careful to place people at the centre of its creation. The input and careful consideration of many local residents and businesses has been invaluable. We hope that you, like us, are excited about what this area will be like in the future.

Page 1070



A handwritten signature in black ink, appearing to read 'Stephen Greenhalgh'.

**Stephen Greenhalgh**  
**Leader, the London Borough of Hammersmith and Fulham**



A handwritten signature in black ink, appearing to read 'Merrick Cockell'.

**Sir Merrick Cockell**  
**Leader, the Royal Borough of Kensington and Chelsea**

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### Albanian

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### Somali

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### Spanish

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### Urdu

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# INTRODUCTION

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## Status of this Document

1

- 1•1 This document is a Supplementary Planning Document (hereafter referred to as SPD), providing supplementary detail to policies contained within the London Borough of Hammersmith and Fulham's (hereafter referred to as 'LBHF') Core Strategy (2011) and the Royal Borough of Kensington and Chelsea's (hereafter referred to as 'RBKC') Core Strategy (2010). It also provides supplementary detail to the Mayor of London's London Plan (2011) in the form of Supplementary Planning Guidance (hereafter referred to as SPG)<sup>1</sup>. The SPD should be read in conjunction with the Mayor's London Plan, the borough Core Strategies and other relevant Development Plan Documents and SPDs.
- 1•2 This SPD is a material consideration for the determination of any planning applications submitted within the OA.
- 1•3 This SPD has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), the Planning and Compulsory Purchase Act 2004 (as amended), the Greater London Authority Acts 1999 and 2007 and Planning Policy Statement 12: Local Spatial Planning. This document is supported by a Sustainability Appraisal, an Equality Impact Assessment, a Statement of Consultation, an Adoption Statement and the Consultation Summary Report.

<sup>1</sup> Please note that the Mayor of London is unable to endorse this planning framework as an SPG to the London Plan during the Mayoral pre-election period. Should the Mayor subsequently choose to adopt this document as an SPG to the London plan, this document will need to be revised to include the Mayor of London's signature and logo and reference to the document being 'subject to endorsement by the Mayor' and this paragraph will be removed.

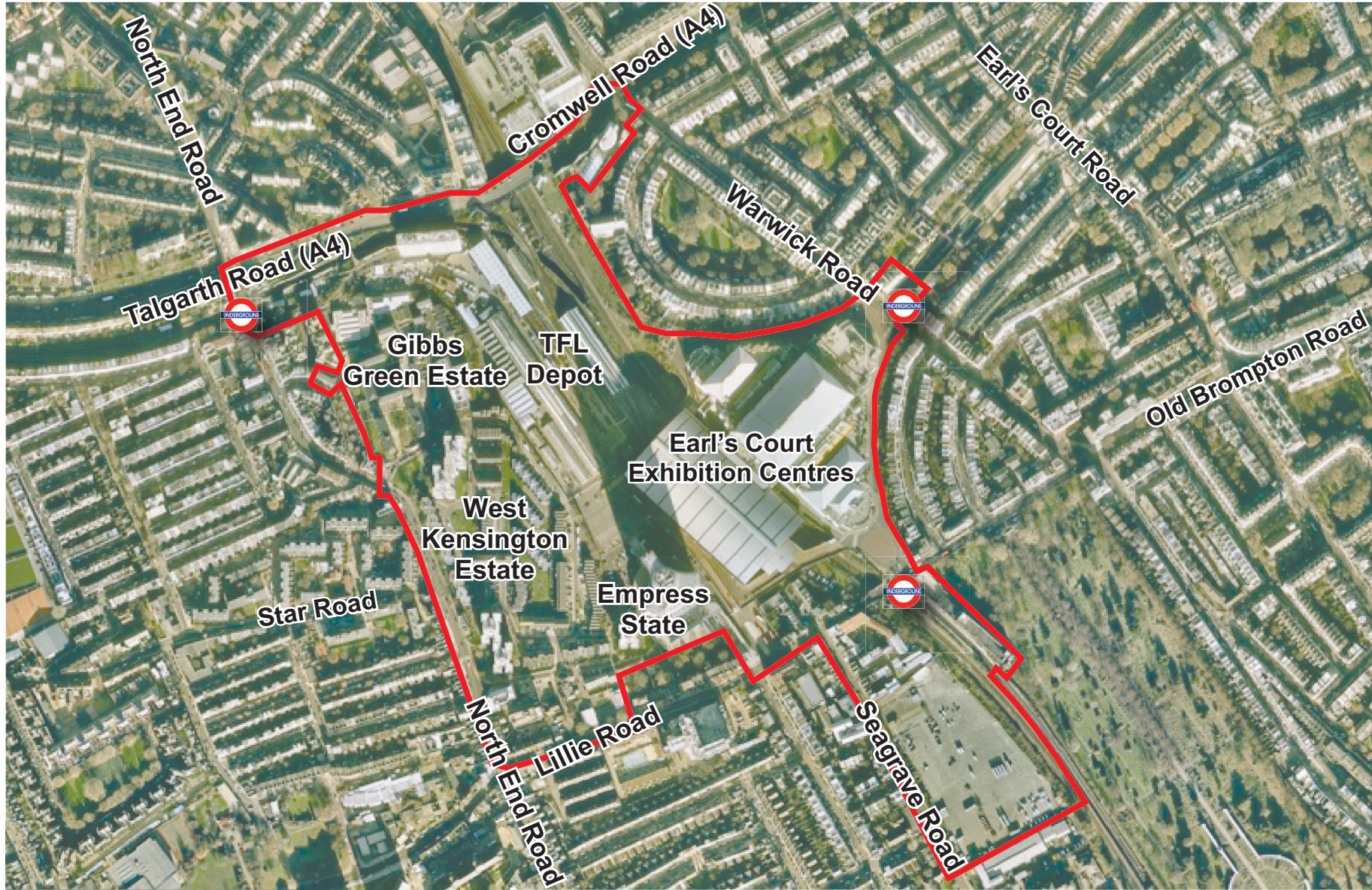


Figure 1.2: Aerial photograph of the OA

## Purpose of this Document

- 1
- 1•4 This document has been produced in partnership between LBHF, RBKC and the Greater London Authority (hereafter referred to as 'GLA') (the 'authorities'). The overall objectives of this 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 planning applications in the OA;
  - establish and provide guidance for masterplanning within the OA;
  - bring forward partnership working in redeveloping the OA and maximise public and private resources in regeneration; and
  - engage all interested stakeholders as early as possible in the development process.
- 1•5 Figure 1.3 illustrates the agreed boundary of the OA. The OA is identified by description in Annex I of the London Plan (2011) which states that *"the area presents a significant opportunity for regeneration comprising estate renewal and housing and employment growth"*.
- 1•6 Capital and Counties (Capco) own the freehold for Seagrave Road car park, are joint owner of the Empress State Building and have a lease on the Earl's Court Exhibition Centres. Transport for London (TfL), who own the freehold to the Lillie Bridge Depot and the land upon which the exhibition halls sit (subject to long leases to Capco), are actively collaborating with adjacent landowners to include their land within the wider redevelopment proposals, as are LBHF, who own the freehold for the West Kensington and Gibbs Green housing estates.
- 1•7 It is recognised that, more than ever in this current time of economic uncertainty, flexibility will be needed to achieve the authorities' strategic vision of comprehensive redevelopment, as reflected in Key Principles HO1 and PS1. 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. The SPD has been drafted with this flexibility in mind, such that it can be applied to any application coming forward in the OA.

# Purpose of this Document

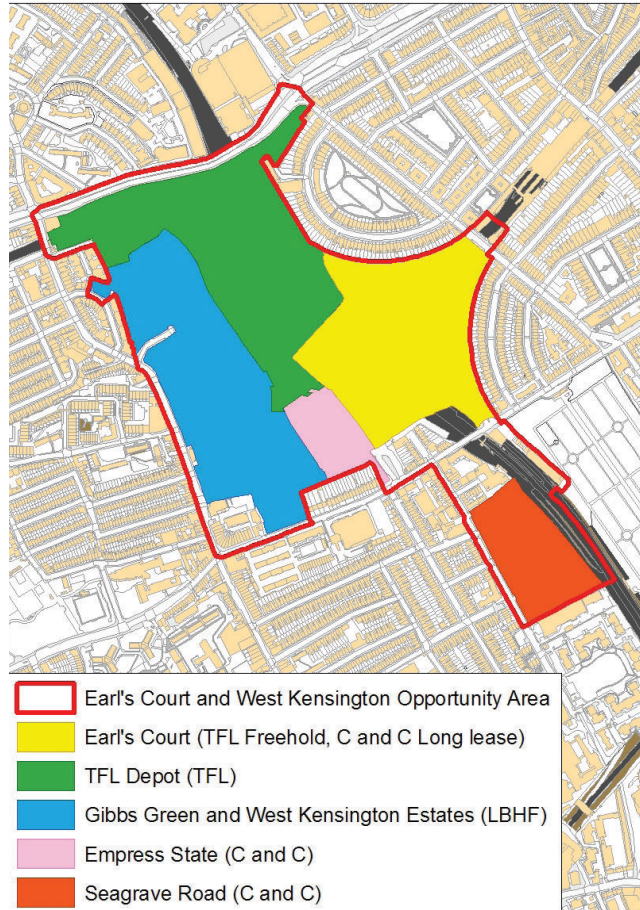


Figure 1.3: Major Land Owners in the OA

## Policy Context

- 1•8 The entire site is identified in the London Plan as an Opportunity Area. In addition, the Core Strategies for LBHF and RBKC both contain planning policies specific to development in the OA. Together, these policies require a minimum of 7,000 jobs and 4,000 homes in a comprehensive residential led mixed use development that includes offices, retail, social and community facilities and a significant cultural destination. These policies also require improved east-west connectivity through the OA and development to uphold and promote the distinctive townscape and range of heritage assets in the area. The policies are reproduced in full in the Appendix.
- 1•9 In addition to these OA specific planning policies, there are also theme based national, regional and local planning policies which apply to any redevelopment of the OA. The Mayor of London has other theme based Supplementary Planning Guidance (such as the Mayor's draft Housing SPG (2011)). These documents include guidance on applying the Mayor's density matrix to large sites. Both boroughs also have theme based Supplementary Planning Documents (such as Noise / Air Quality SPDs in RBKC) which also apply to redevelopment of the OA.

## Structure of the Document

1

- 1•10 This SPD comprises of the following chapters:
- 1•11 **1: INTRODUCTION.** Introduces the SPD, setting out its status and purpose and the timetable for its adoption.
- 1•12 **2: SITE CONTEXT.** Sets the scene for the OA as it is today, by describing the spatial, social and historical context for the area.
- 1•13 **3: VISION AND OBJECTIVES.** Sets out the Vision and Key Objectives to guide development in the OA.
- 1•14 **4: URBAN FORM STRATEGY.** Establishes the Key Objectives for the urban form of the OA and provides Key Principles setting out how they could be achieved.
- 1•15 **5: HOUSING STRATEGY.** Sets out the requirements for housing provision in the OA, in particular in terms of any estate regeneration proposals, tenure mix and unit size mix.
- 1•16 **6: EMPLOYMENT STRATEGY.** Sets out the requirements for office provision and local job creation and training in the OA.
- 1•17 **7: RETAIL STRATEGY.** Sets out the requirements for retail provision within the OA.
- 1•18 **8: CULTURE STRATEGY.** Sets out the requirements to create a cultural destination that retains Earl's Court's cultural 'brand'.
- 1•19 **9: SOCIAL AND COMMUNITY FACILITIES STRATEGY.** Sets out the requirements for the provision of social and community facilities, such as education (secondary, primary and nursery), health, leisure and sports provision, policing facilities, library provision and community meeting spaces.
- 1•20 **10: TRANSPORT AND ACCESSIBILITY STRATEGY.** Sets out the necessary improvements to the transport infrastructure to accommodate development, including walking, cycling, public transport and traffic.
- 1•21 **11: ENERGY STRATEGY.** Sets out requirements for development to reduce carbon dioxide emissions and deliver energy sustainability.
- 1•22 **12: ENVIRONMENTAL STRATEGY.** Outlines requirements relating to climate change, flood risk and water management, land contamination, waste, demolition and construction, land contamination, air pollution, noise pollution and ecology.
- 1•23 **13: PHASING AND SECTION 106 STRATEGY.** Sets out the required contributions from development and when, where known, these contributions should be delivered.
- 1•24 **POLICY CONTEXT APPENDIX.** Provides the current planning policy context in relation to the OA, as set out in the Mayor's London Plan (2011), RBKC's Core Strategy (2010) and LBHF's Core Strategy (2011).

1•25 Chapters 4 to 12 all follow a similar structure, based on the following diagram:

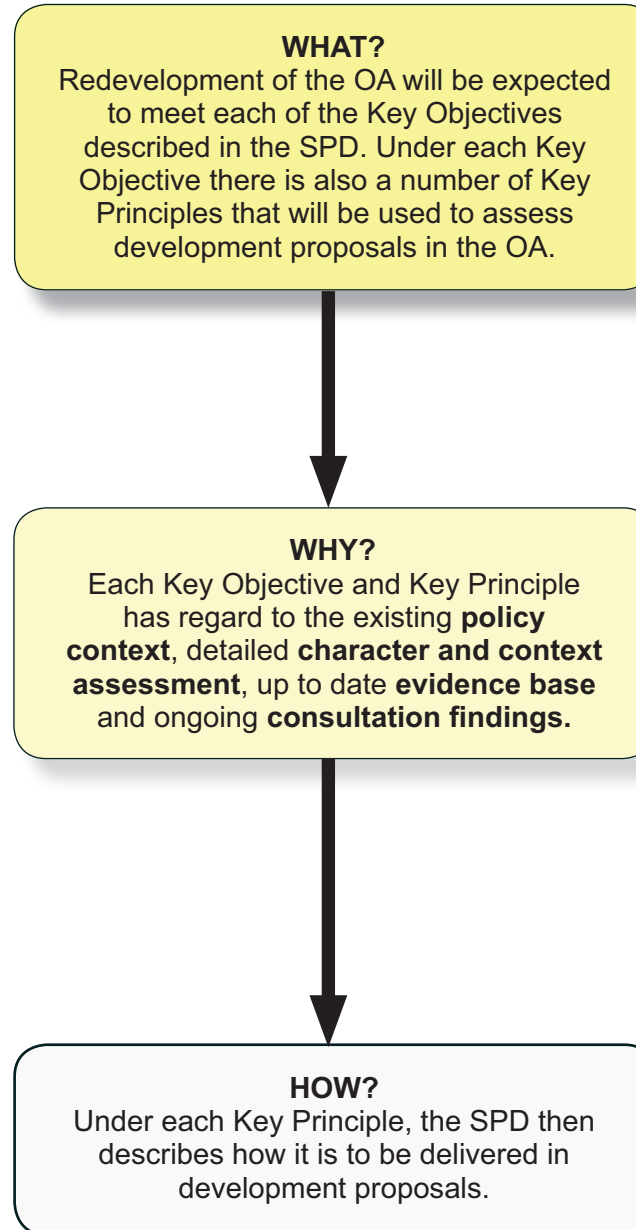


Figure 1.4: Structure of the SPD chapters



# SPD Timetable and Supporting Documentation

1

- 1•26 Figure 1.5 summarises the timetable and key consultation stages in the preparation of this SPD. It also shows what supporting evidence has informed its production. A number of supporting evidence documents have been produced in order to inform this SPD. These can be found on the three authorities' websites and should be read alongside this SPD. A summary of each document is provided below:
- 1•27 **SUSTAINABILITY APPRAISAL.** Assesses the potential impacts of the document on a range of environmental, social and economic criteria.
- 1•28 **EQUALITY IMPACT ASSESSMENT.** Assesses the potential impacts of the document on a number of identified minority groups.
- 1•29 **STATEMENT OF CONSULTATION.** A statement setting out those consulted by the authorities in connection with the preparation of the SPD, how the consultations were carried out, a summary of the main issues raised in those consultations ("the Consultation Summary Report") and how the representations have been addressed in the SPD ("the Consultation Responses Schedule").
- 1•30 **CONSULTATION SUMMARY REPORT.** Provides a summary of the comments raised during consultation on the revised draft of the SPD.
- 1•31 **CONSULTATION RESPONSES SCHEDULE.** Sets out the comments received during consultation on the revised draft of the SPD and the officers' responses to these comments.
- 1•32 **CHARACTER AREA ANALYSIS.** Is a study of the local urban character of the OA and its surroundings.
- 1•33 **TOWNSCAPE AND VISUAL ANALYSIS.** Is a study of the physical fabric of the area and townscape through the analysis of existing views towards the OA from observation points around the OA. The analysis assesses the setting of existing Conservation Areas' skylines through an eye level visual assessment that identifies the key attributes and features in each view.
- 1•34 **EDGES STUDY.** Is a study of the existing OA boundary edge conditions between the OA and properties which share its boundary.
- 1•35 **DEVELOPMENT CAPACITY SCENARIOS.** Sets out the three development capacity scenarios that were published in the first draft of the SPD. An illustrative Masterplan is provided for each and they are tested against the revised Key Objectives. They are followed by an alternative illustrative masterplan solution demonstrating a different approach to urban design that has the potential to meet all of the Key Objectives. Any masterplan images in this, or any other SPD document, do not and will not fix a design form and layout for the OA.
- 1•36 **EARL'S COURT AND WEST KENSINGTON OPPORTUNITY AREA OFFICE STUDY (2011).** Explores the potential for office floorspace within the OA.
- 1•37 **EARL'S COURT AND WEST KENSINGTON OPPORTUNITY AREA RETAIL NEED ASSESSMENT (2010).** Provides an assessment of retail need in the OA, looking specifically at retail capacity.
- 1•38 **EARL'S COURT AND WEST KENSINGTON OPPORTUNITY AREA ECOLOGICAL ASPIRATIONS STUDY (2010).** Assesses the ecological and habitat value of the OA and sets out several aspirations to protect and enhance ecology and habitat diversity in the OA.

# SPD Timetable and Supporting Documentation

- 1•39 **DECENTRALISED ENERGY FEASIBILITY STUDY (2011).** This sets out the potential for decentralised energy in the OA and sets out the strategic framework for the development of a site-wide, low carbon, decentralised energy scheme in the OA.
  
- 1•40 **ESTATES REGENERATION ECONOMIC APPRAISAL (2011).** Provides a summary of the four options for intervention on the West Kensington and Gibbs Green estates.
  
- 1•41 **TRANSPORT STUDY REVIEW (2011).** This Summary Report outlines the findings of the Earl's Court & West Kensington Strategic Transport Study (ECTS) and the independent review carried out by, and on behalf of TfL, LBHF and RBKC. The purpose of the review is to ensure that the ECTS and underlying analysis is acceptable to inform the SPD.
  
- 1•42 **VIABILITY REVIEW (2011).** Is a review that assessed the three development capacity scenarios (see para 1.47) above and assesses the viability of development at these three densities. The study was only accurate at the time it was undertaken in 2011 and any applications for development would need to be accompanied by their own viability assessments.

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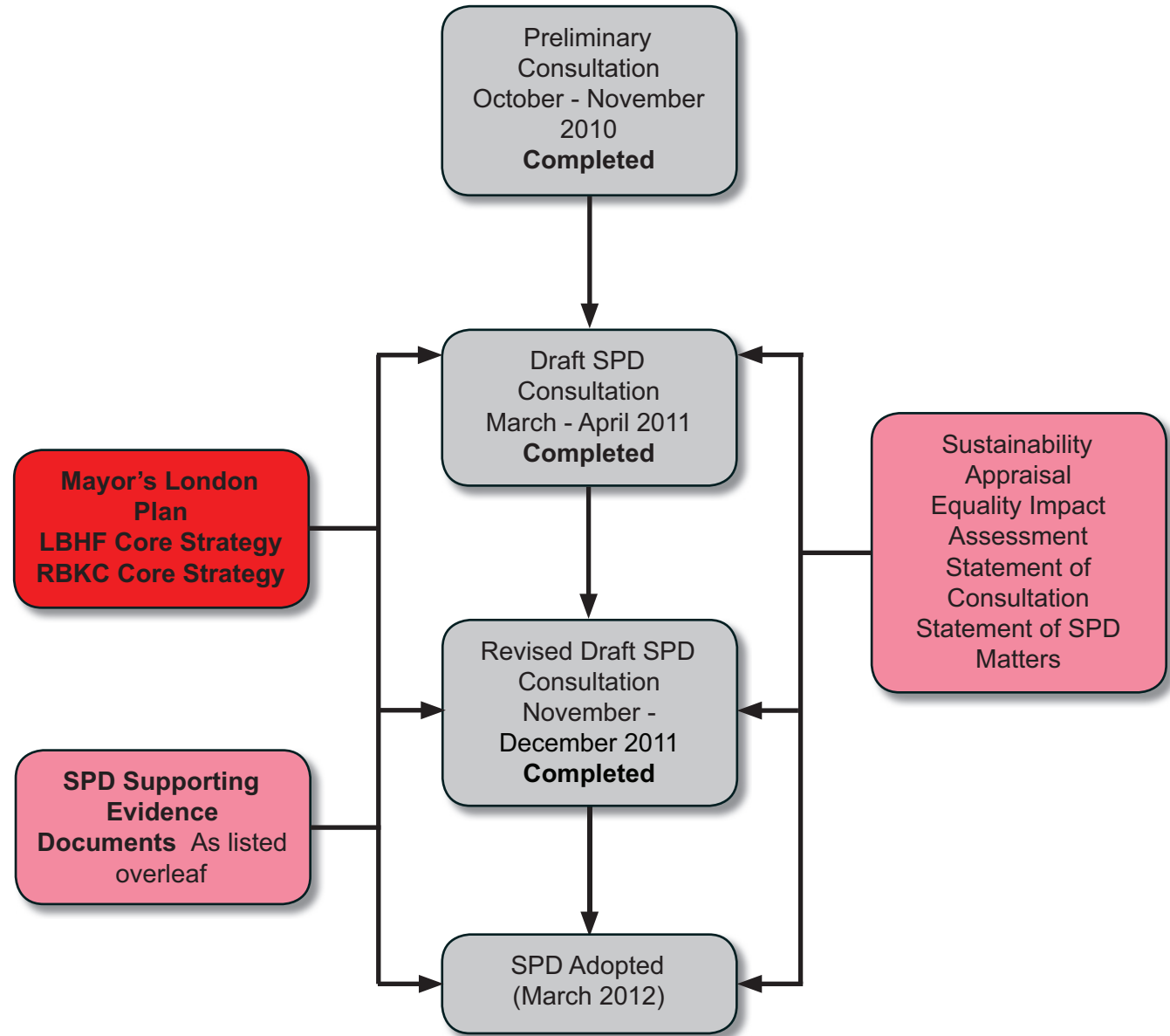


Figure 1.5: SPD timetable and supporting documentation



# 02 SITE CONTEXT

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## Overview

2

2•0 This chapter gives a broad overview of the physical, economic and social nature of the OA today. It is intended to provide the background information that will be needed to understand the rest of this SPD. This chapter is structured around four broad themes:

- strategic context;
- existing urban form and topographical conditions;
- existing land uses; and
- heritage assets.

2•1 The OA 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). The OA boundary is defined by Warwick Road and the West London Line to the east, West Cromwell Road (A4) to the north, North End Road to the west and Old Brompton Road/Lillie Road to the south.

2•2 The Seagrave Road car park is a parcel of land within the OA situated south of Lillie Road bounded by Seagrave Road and the West London Line. 27.8ha of the site is contained within LBHF and the remaining 9.4ha is contained within RBKC comprising the Earl's Court 1 Exhibition Centre, some vacant land along the railway and some buildings associated with Clear Channel advertising.

## Strategic Context

2•3 Figures 2.1 and 2.2 show the strategic context of the OA. The A4, along the north of the OA, is identified in the London Plan (2011) as the 'western wedge'. The Mayor of London has aspirations that this wedge will develop into an important commercial corridor, linking London's largest airport (Heathrow) and the two important commercial centres of The City and the West End.

2•4 The White City Opportunity Area, Park Royal Opportunity Area and Kensal Opportunity Area, all north of the OA, are likely to undergo significant regeneration or redevelopment over the next twenty years.

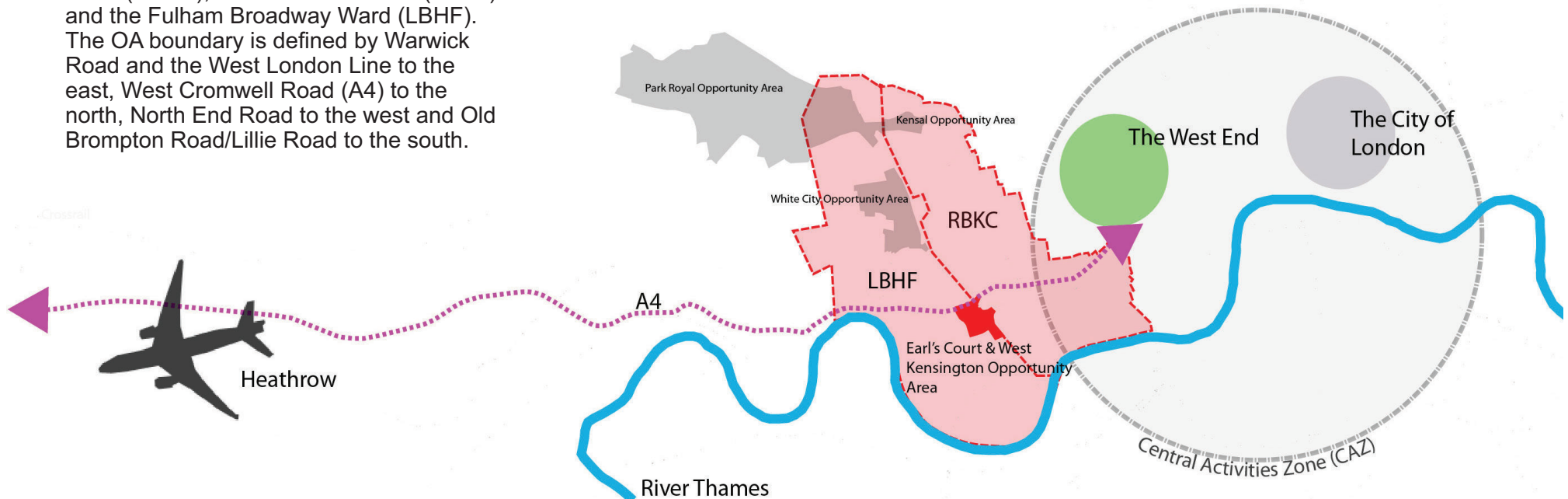


Figure 2.1: The OA Strategic Context

# Strategic Context

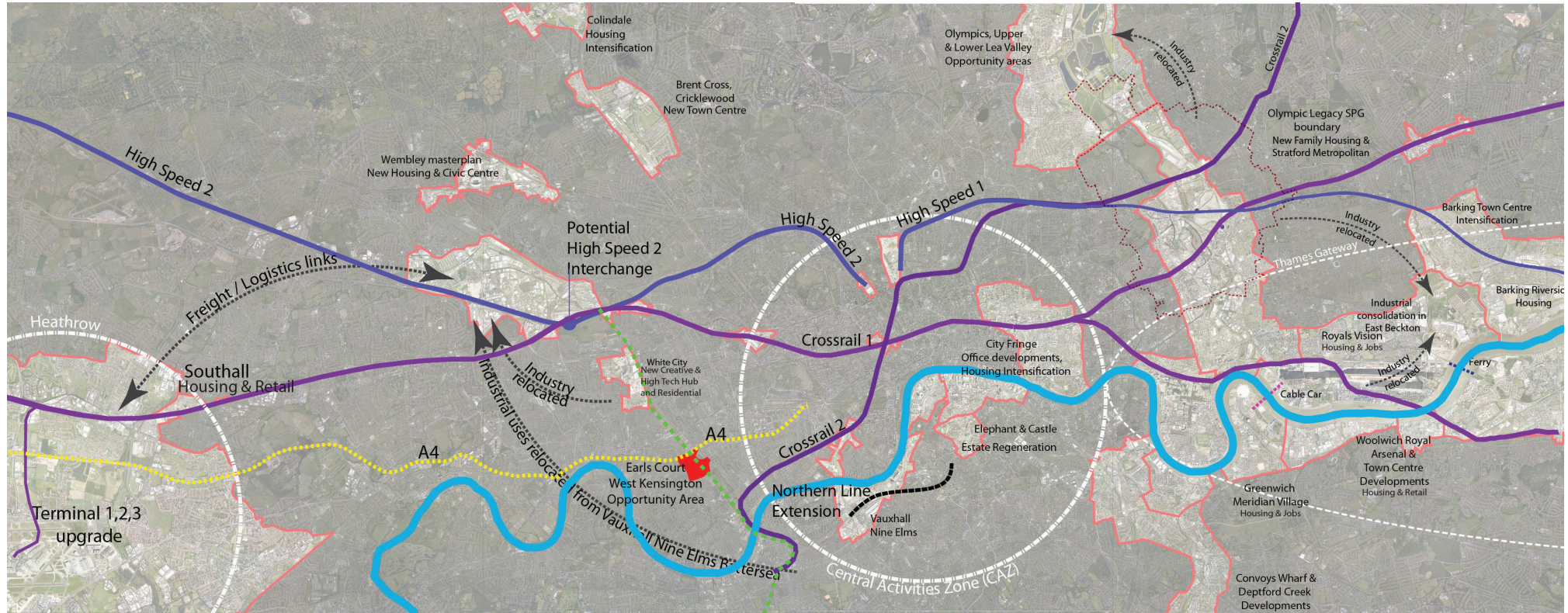


Figure 2.2: The OA Strategic Context

**Key**

- River Thames
- A4
- Crossrail 1 and 2\*
- West London Line
- Central Activities Zone (CAZ)
- High Speed 1 and 2
- The Earl's Court and West Kensington Opportunity Area (The OA)

## Urban Form

2

- 2•5 The OA is dominated by the Empress State Building and Earl's Court Exhibition Centres, which are major landmarks on the West London skyline. It is made up of large, impermeable land holdings that lack connections into the surrounding area. The built form, whilst mixed in terms of age and type, is characteristically different from that found in the surrounding areas. For example, many of the buildings in the OA are stand alone structures with large footprints, which create a very different environment from that created by the terraces and mansion blocks found in the surrounding area. This is illustrated in the plan in figure 2.4.
- 2•6 Furthermore, there are a number of significant barriers to movement within the OA. For example, the West London Line, which runs along the boundary between LBHF and RBKC, forms a physical barrier to movement from east to west and the A4 stops pedestrians who wish to pass from north to south.
- 2•7 The OA is surrounded by significant heritage assets, including 19 conservation areas, numerous listed buildings and Brompton Cemetery, which is a conservation area, the setting of listed buildings and monuments, a registered 'park and garden' of special historic interest (Grade I listed) and Metropolitan Open Land. For further detail, please see page 39.
- 2•8 Figure 2.3 illustrates the boundary of the OA and the current land ownerships within it. Capco own the freehold for both Seagrave Road car park and the Empress State Building and have a lease on the Earl's Court Exhibition Centres. After the 2012 Olympics the Earl's Court Exhibition Centres and the Seagrave Road car park sites are likely to be redeveloped. Transport for London (TfL) and LBHF are currently discussing the possibility of including land within their ownership within the redevelopment site.

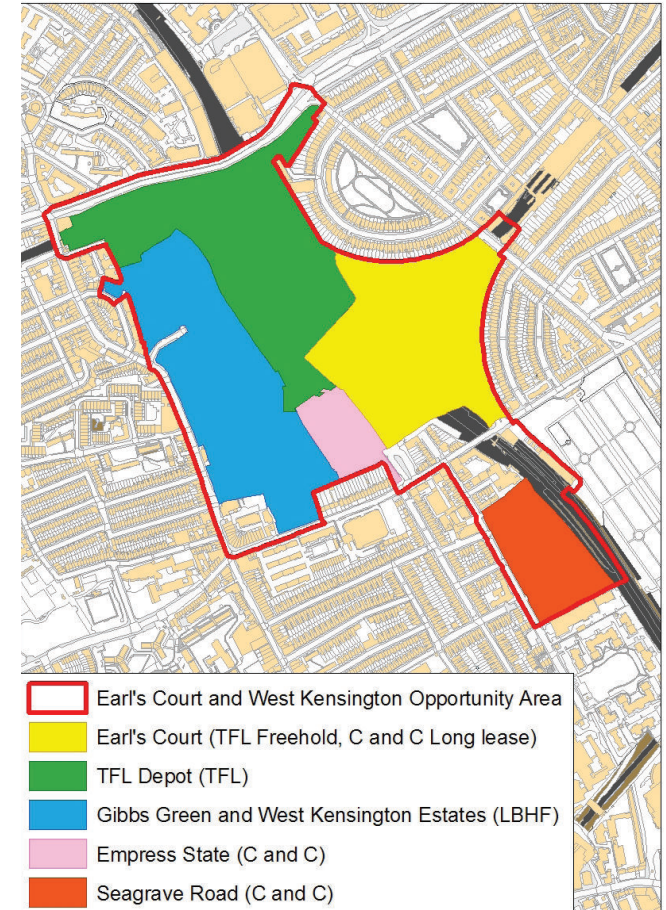


Figure 2.3: Major Land Owners in the OA

# Urban Form

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Figure 2.4: Urban structure of the OA and its Surroundings



## Heritage Assets

2

2•9 There are 19 conservation areas in and around the OA. One of these is Brompton Cemetery. It forms the setting of listed buildings, a registered 'park and garden' of special historic interest (Grade I listed) and is Metropolitan Open Land.

2•10 There are Character Profiles or Conservation Area Proposals Statements available for each of these conservation areas (with the exceptions of Walham Green, Turneville/Chesson and The Billings). These describe the special interest, character and appearance of each area and in many cases they also include constructive design guidelines to help to preserve or enhance them. Therefore, proposals for the OA will be expected to demonstrate due regard to these documents. Furthermore, in light of the significant heritage assets surrounding the OA, particular attention must be paid to Planning Policy Statement 5: Planning for the Historic Environment (2010).

2•11 The conservation areas in and around the OA are:

- (A) Philbeach Conservation Area;
- (B) Nevern Square Conservation Area;
- (C) Earl's Court Square Conservation Area;
- (D) Earl's Court Village Conservation Area;
- (E) Courtfield Conservation Area;
- (F) Brompton Cemetery;
- (G) The Boltons Conservation Area;
- (H) The Billings Conservation Area;
- (J) Sedlescombe Conservation Area;
- (K) Walham Grove Conservation Area;
- (L) The Walham Green Conservation Area;
- (M) Barons Court Conservation Area;
- (N) Queens Club Gardens Conservation Area;
- (O) Turneville/Chesson Conservation Area;
- (P) Olympia and Avonmore Conservation Area;
- (Q) Dorcas Estate Conservation Area;
- (R) Fitzgeorge and Fitzjames Conservation Area;
- (S) The Gunter Estate Conservation Area; and
- (T) The Edwardes Square/Scarsdale & Abingdon Conservation Area.



Figure 2.5: Brompton Cemetery



Figure 2.6: The Boltons



Figure 2.7: Queens Club Gardens

# Heritage Assets

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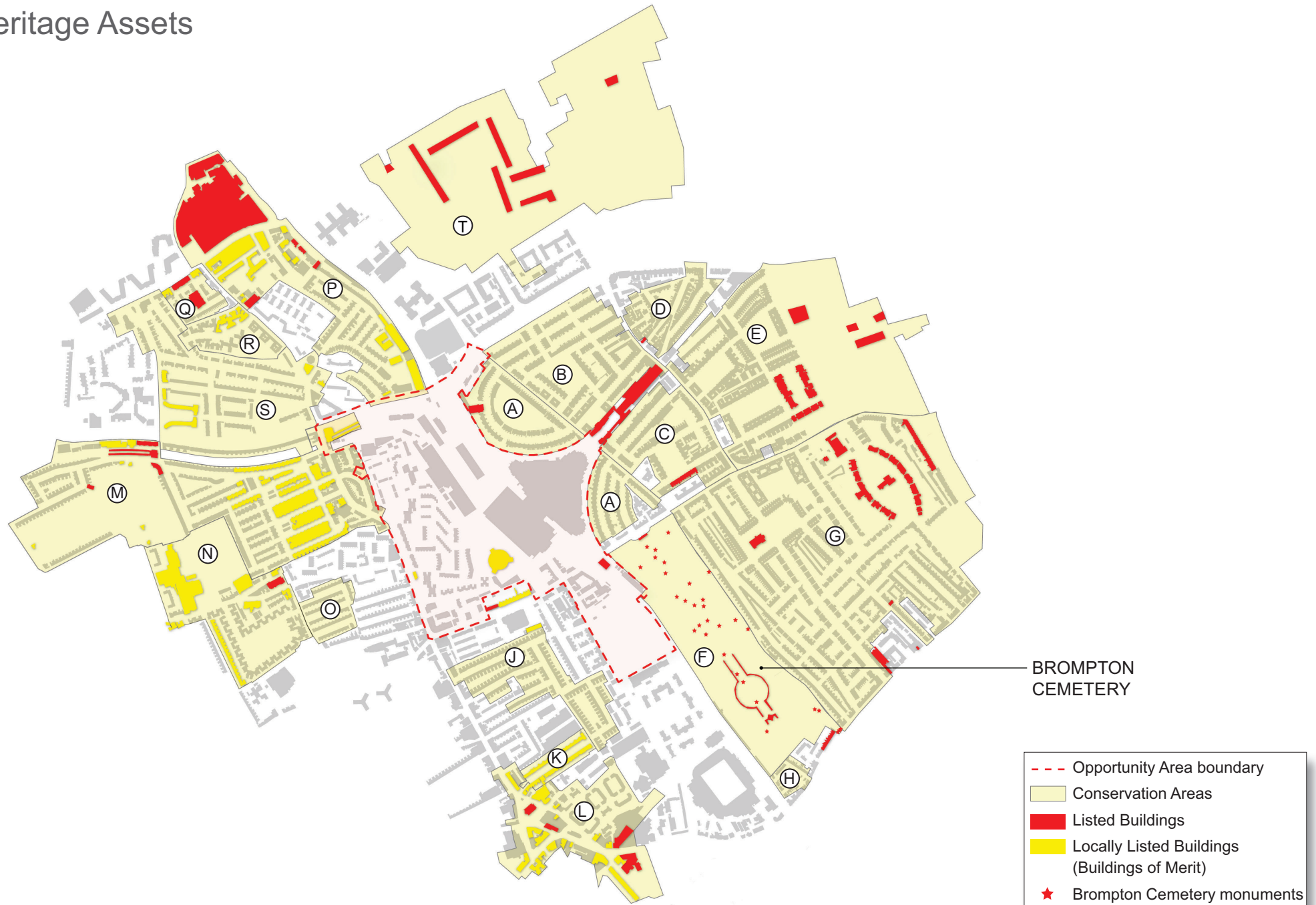


Figure 2.8: Surrounding conservation areas, listed buildings and Brompton Cemetery monuments

# Historical Development

2

## Earl's Court's Origins

- 2•12 The OA and its surroundings were once significant landholdings held by notable families such as the De Veres, the Copes, the Rich family and the Edwardes family. The name 'Earl's Court' has been in use since land ownership passed to the Rich family in 1614. The members of this family included the Earls of Warwick and Holland and their estate was governed from a manorial courthouse in the area.
- 2•13 The area had rural beginnings, as it once comprised of market gardens, brickfields, potteries and nurseries. Housing and other development commenced around the 1770s, following the development of Chelsea to the south.
- 2•14 The Counter's Creek was one of the tributaries running into the River Thames from Kensal Green. Its alignment ran along what is now the West London Line. Since medieval times it functioned as a natural border, with few early crossings.

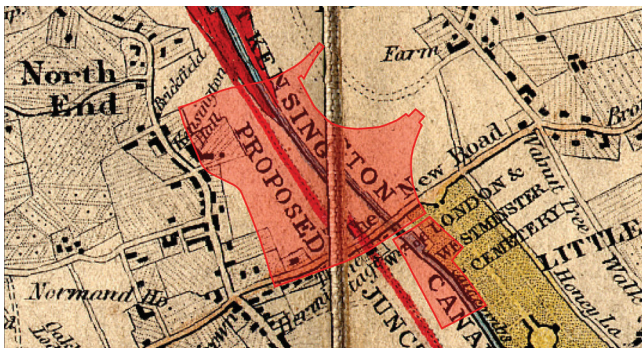


Figure 2.9: Map of the OA and its surroundings in the 1840s

## Early Development & Enterprises

- 2•15 One of the first development initiatives was the transformation of the Counter's Creek into Kensington Canal in 1828. However, by the time it was complete the canal was already obsolete as the train had become the preferred mode of transporting freight. The West London Railway was developed in 1844, connecting the area with Clapham Junction. It had a chequered early history, closing due to insufficient patronage after 6 months, only to be re-opened solely to transport coal in 1845, then re-opening as a passenger service in 1863.
- 2•16 Brompton Cemetery was also an early development in the area. Its grounds were laid out in the 1830s and consecrated in 1840. It features a domed chapel at its southern end, reached by long colonnades and catacombs. The Cemetery was designed to give the feel of a large open air cathedral. It occupies 16.5 hectares of space and is owned and managed by The Royal Parks. It contains a number of Listed Monuments.

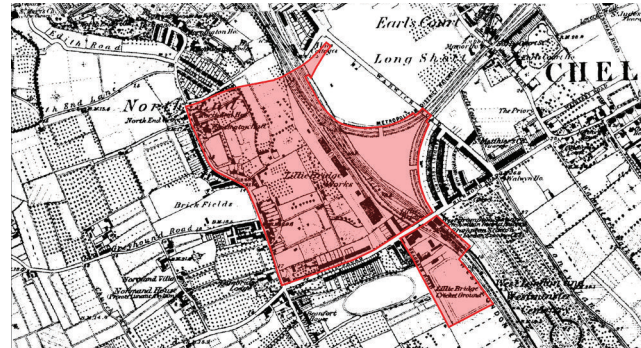


Figure 2.10: Map of the OA and its surroundings in the 1870s

- 2•17 A significant tide of mostly residential development occurred between the 1860s and mid 1890s, which saw some 60 acres of land being redeveloped. Lillie Road and Fulham Palace Road represented the western edge of this new development in 1893.
- 2•18 Residential development in the Earl's Court area was supported by the arrival of rail transport during this time. The District Line was the first to arrive, with West Brompton Station opening in 1866, Earl's Court Station in 1871 and Fulham North End Station in 1874 (later to be re-named West Kensington Station). The Piccadilly Line opened in 1906 at Earl's Court. The OA has long been the site of a rail depot and repair sheds (since the 1870s) and the distinctive crescent form of development at Philbeach Gardens and Eardley Crescent were informed by the curving rail tracks of the District and Piccadilly lines.

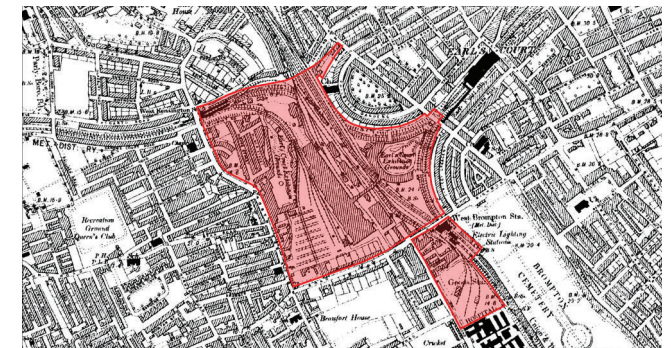


Figure 2.11: Map of the OA and its surroundings in the 1890s

# Historical Development

## The Exhibition Centres

- 2•19 Exhibitions and shows have taken place on the Earl's Court site since the 1880s. These were largely in the form of travelling shows. Temporary halls were built to accommodate them, and these were demolished and rebuilt in 1894 as the Empress Hall and the Empress Theatre.
- 2•20 Of note from these early exhibitions was the Earl's Court gigantic wheel, erected in 1895. At 300 feet high it was almost as big as the London Eye is today and its 40 wooden cabins carried 1,200 passengers at a time. Although it was widely popular it was demolished 12 years later.
- 2•21 Earl's Court Exhibition Centre 1 was completed in 1937. It was designed by American architect Charles Howard Crane, and was Europe's biggest structure by volume spanning 250 feet. Its distinctive art deco facade fronted onto a generous forecourt at Warwick Road and still forms a recognisable feature today.
- 2•22 In 1991 Earl's Court Exhibition Centre 2 was completed. This facility is physically linked with Earl's Court Exhibition Centre 1 and is situated on part of the former Lillie Bridge.



Figure 2.12: The view along Longridge road showing the Earl's Court gigantic wheel in 1895



Figure 2.13: Earl's Court 1 (EC1) today



Figure 2.14: Earl's Court 2 (EC2) today

## Twentieth Century Development

- 2•23 The Twentieth Century saw the influence of the motorcar on development as well as the effect of the opening of Heathrow Airport on connections between the western periphery of London and its centre.
- 2•24 Lillie Road replaced Star Road and Greyhound Road as the main thoroughfare across Fulham when motorised buses were introduced in 1906. In 1957 West Cromwell Road Bridge was built, linking Talgarth Road with West Cromwell Road and creating a stronger connection between Central London and West London. This was strengthened further in 1961 with the construction of the Hammersmith Flyover.
- 2•25 The Empress State Building was completed in 1961, originally designed as a hotel. The building was renovated in 2003 and another three floors were added.
- 2•26 The Gibbs Green estate was built in 1961 and the West Kensington estate was built between 1972 and 1974.

## Transport and Accessibility

2

- 2•27 The OA is a transport dominated site with a mix of transport infrastructure adjoining or running through and under it. These include the strategically important West Cromwell Road, which runs along the northern edge of the area and the Earl's Court One Way System (ECOWS) which borders the area on the east (both are part of the Transport for London Road Network (TLRN)). Below street level the West London Line (part of the London Overground Network) runs through the site, separating communities in Hammersmith and Fulham from those in Kensington and Chelsea, whilst around this are the London Underground District and Piccadilly lines.
- 2•28 The local transport facilities play an important role in connecting Earl's Court to the rest of London and the UK as a whole but at a local level they do create significant severance, which impacts on local quality of life and accessibility to goods, services and employment.
- 2•29 As is the case in most of London there is an extensive pedestrian footway network along existing local streets and roads. However there are some areas where the quality of this network discourages walking, with poor maintenance, excessive street clutter, inconvenient pedestrian crossings and an inappropriate balance between the needs of pedestrians and vehicles. This, along with the severance caused by the West London Line, the District line, the Earl's Court Exhibition Centres, creates a barrier to north-south and particularly east-west pedestrian and cycle movement through the OA. This isolates the OA, reduces the attractiveness of walking and cycling and restricts access to local public transport. West Cromwell Road, running along the north side of the site, creates severance between the OA and the residential areas to the north.
- 2•30 Once off the busiest primary roads the majority of streets surrounding the OA represent a safe and attractive environment for pedestrians and cyclists, although the system of one-way local roads, designed to discourage vehicles from rat running, does cause inconvenience for cyclists and cycle parking facilities are inadequate.
- 2•31 The OA is served by three London Underground stations; Earls Court, West Brompton and West Kensington. These stations provide access to the District and Piccadilly lines. West Brompton is also served by the Overground network. The edges of the OA are thus well served with a high Public Transport Accessibility Level (PTAL), but the centre has a low PTAL of just 2.
- 2•32 The London Underground lines serving the OA are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly lines in the AM peak. Significant increases in capacity are planned and funded for the District and Piccadilly lines as part of the London Underground upgrades. The District line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is no definite date for the upgrade of the Piccadilly line, which would provide a capacity increase of 25%, although it is expected to be complete prior to 2031. Crossrail is planned to open in 2018, which will release capacity on the Central line, which in turn will draw passengers from the Piccadilly line, thereby releasing some limited capacity.
- 2•33 All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancements. In addition crowding will increase to over three people per square metre on all southbound services to West Brompton.
- 2•34 All the boundary roads carry very high levels of traffic and operate at, or near, capacity in the peak periods. The dominant traffic flows are east-west on West Cromwell Road (around 6,000 vehicles in the peak periods) and north-south on the ECOWS (around 2,000 southbound and 1,000 – 1,500 northbound). The majority of traffic signals in the area operate on the SCOOT system to better optimise junction capacity, although, given the dominance of

## Transport and Accessibility

east-west traffic on the local road network, priority is given to this movement at the junctions along West Cromwell Road.

- 2•35 There are a significant number of traffic delay hotspots in and around the OA, including at all four corners of the site, during both peak periods as well as the weekend. This is particularly apparent at the West Cromwell Road junctions with Warwick Road and North End Road, the whole length of which is subject to delays. Delay is generally highest during the PM peak period, particularly on West Cromwell Road between the Warwick Road and Earl's Court Road junctions.
- 2•36 Both West Cromwell Road and the ECOWS have negative impacts on the ease and attractiveness of pedestrian and cyclist movement, residential amenity, access to bus services and the townscape of the areas through which they run, including the OA.
- 2•37 The existing site includes 2,500 car parking spaces, primarily for the use of exhibitors and visitors to the Exhibition Centre although some public parking also takes place. On-street in Kensington and Chelsea there is a mixture of residents' and pay and display parking with limited spare capacity. In Hammersmith and Fulham the available parking for visitors is greater because dual use parking bays are provided.

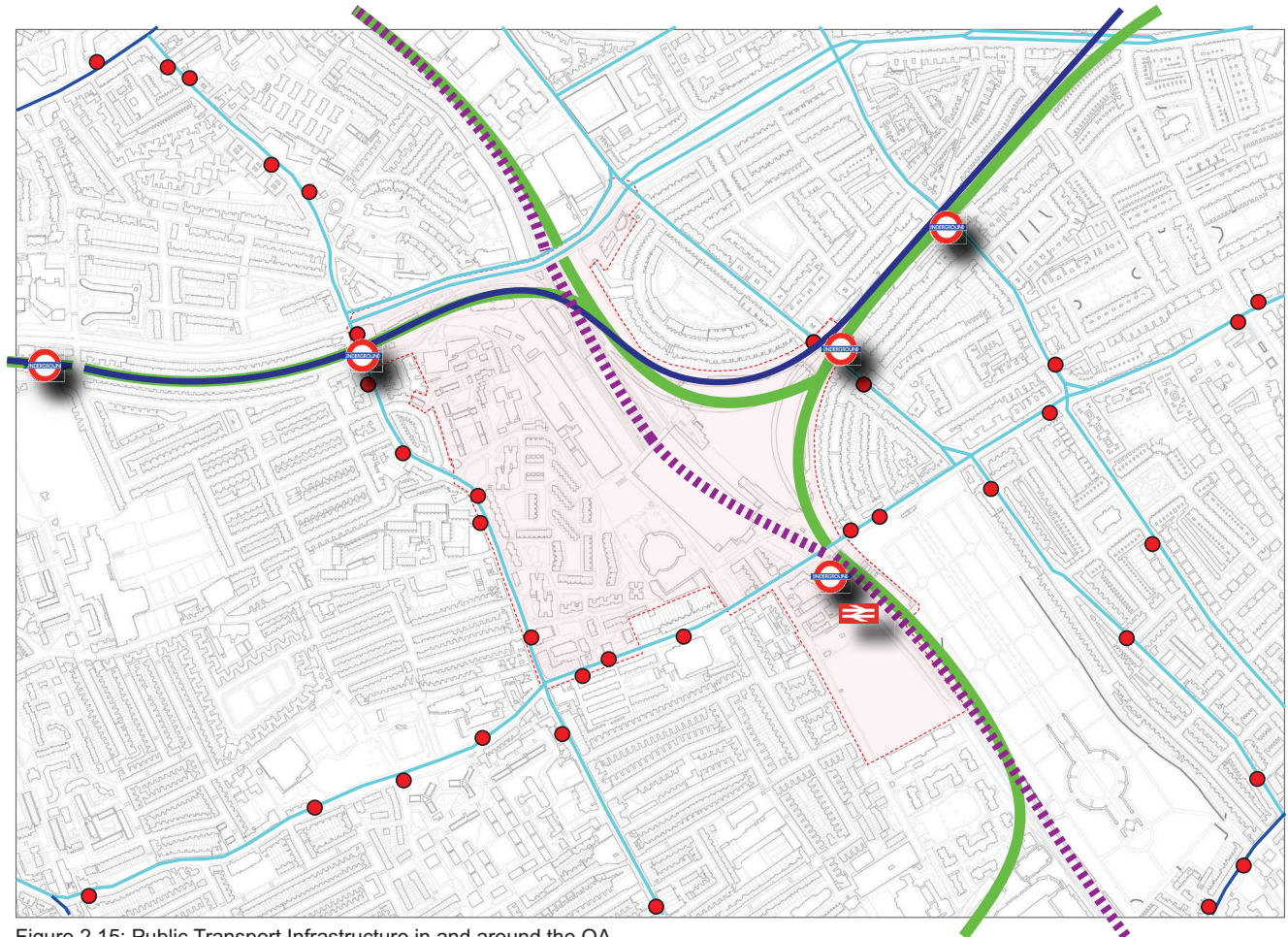


Figure 2.15: Public Transport Infrastructure in and around the OA



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## Topographical and Environmental Conditions

2

2•38 The OA has some very distinctive changes in ground levels, often as a result of the railway infrastructure. There is a significant change in ground level from the east of the OA to the west in order to provide clearance over the West London Line. The ground level is highest under Earl's Court Exhibition Centre 1 where the Wimbledon Branch of the District Line passes underground. There is also a significant drop in level along the northern edge of the OA, from the A4 flyover in the north east to the traffic junction in the north west. The Ealing Broadway and Richmond branches of the District Line are contained within a steep cutting that runs alongside the northern boundary of the OA.

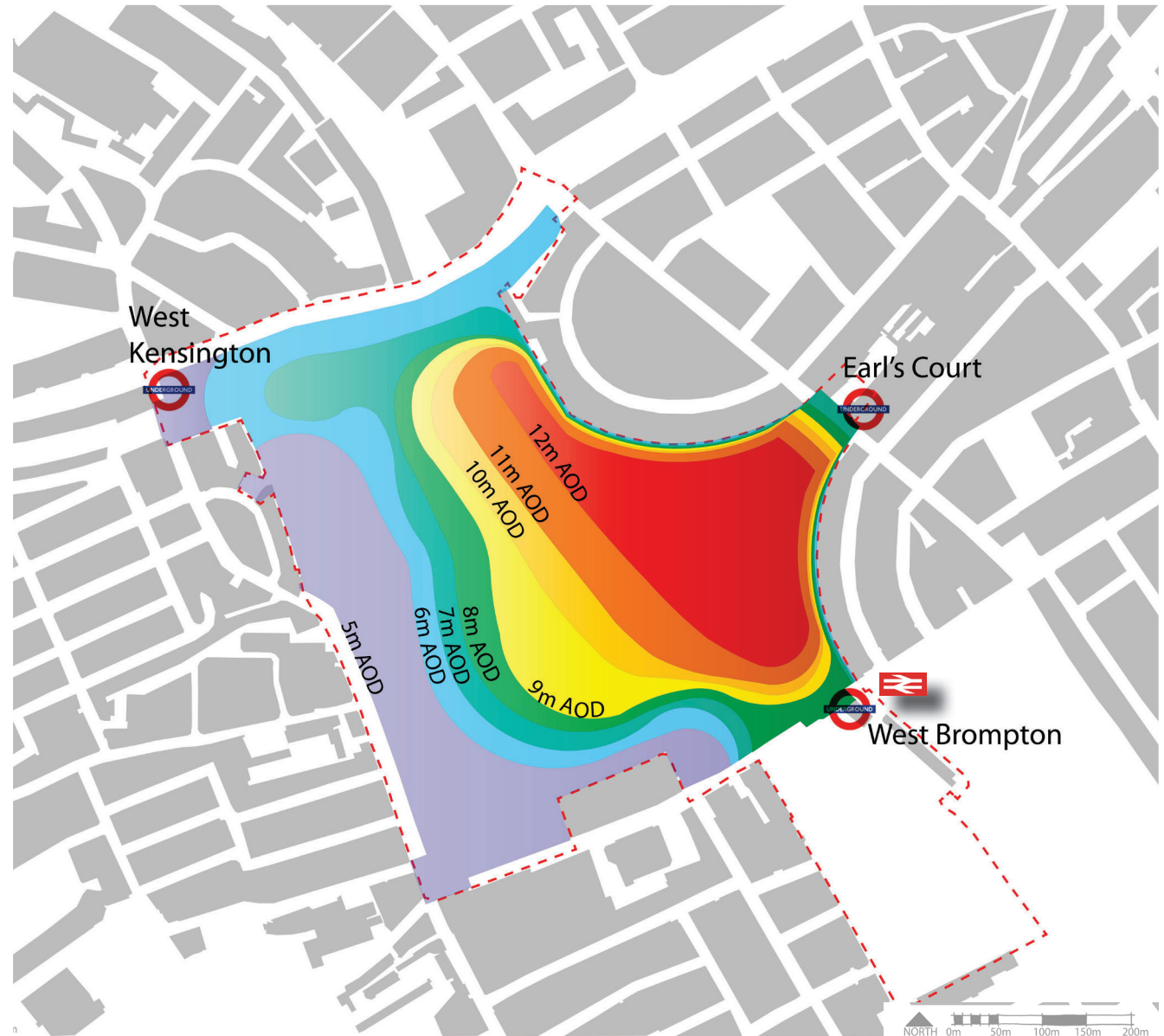


Figure 2.16: Diagram Indicating the changes in topography across the site

## Topographical and Environmental Conditions

- 2•39 Much of the OA is located in an area of high flood risk (Flood Zone 3), as identified by the Environment Agency, and the area is susceptible to sewer/stormwater and potentially surface water flooding. Figure 2.17 illustrates the flood risk zones in the area.
- 2•40 The OA is also within an Air Quality Management Area and currently includes some areas of poor air quality which are predominantly located along the roads surrounding the OA.

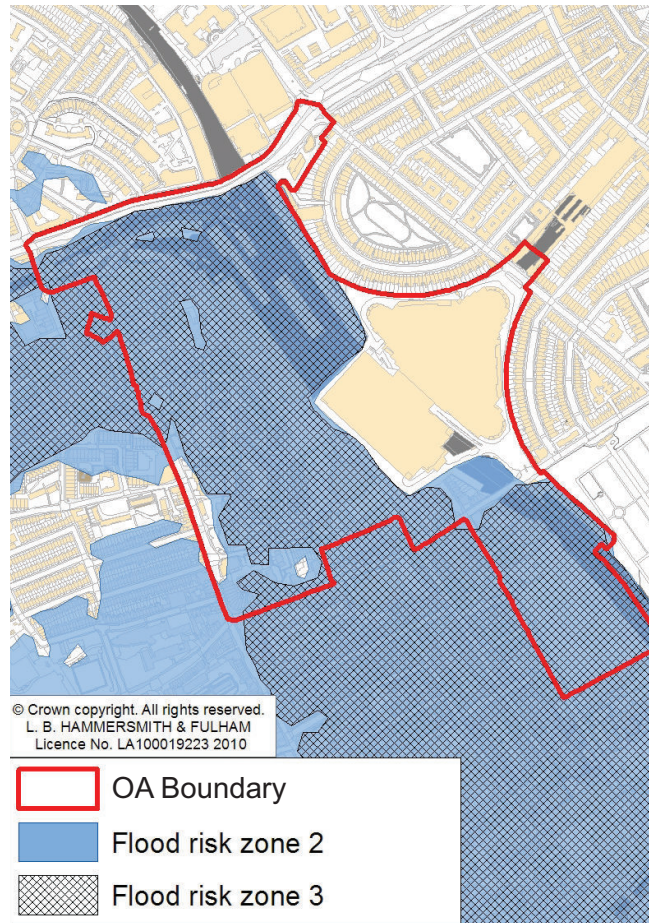


Figure 2.17: Flood Risk Zones in and around the OA



# Building Heights

2

- 2•41 There are three significant tall buildings within the OA; the 31 storey Empress State Building; Earl's Court 1 which is a maximum height of 63m AOD; and Earl's Court 2. These are located on the eastern side of the OA. Buildings of these heights are atypical in the immediate surroundings.
- 2•42 Other buildings with significant height in the OA are dispersed more widely. Ashfield House to the north and the four council blocks on the west rise to between 9 and 11 storeys. The heights across the rest of the site are between 2 and 6 storeys and are more closely related to those prevailing in the surrounding area (figure 2.18).
- 2•43 In the surrounding area, building heights are related to building typology. The important residential typologies found around the OA include town houses, terraced town houses, mansion blocks, mews houses and infill blocks.



Figure 2.18: Building heights in the OA and its surroundings

Maximum height AOD*	Approx. equivalent in modern storey heights AOD*	Maximum height AOD*	Approx. equivalent in modern storey heights AOD*
110m	34 residential 28 office	110m	34 residential 28 office
70m	21 residential 17 office	70m	21 residential 17 office
60m	17 residential 14 office	60m	17 residential 14 office
50m	15 residential 12 office	50m	15 residential 12 office

- - - The OA boundary

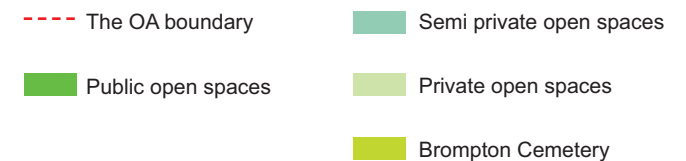
\*AOD: Above Ordnance Datum

## Open Space

- 2•44 There is an identifiable pattern of open space in the OA's surroundings. This consists of:
- formal **garden squares**, which are usually lined on one or two sides by buildings and are predominantly 'semi private' (accessible only to those who contribute to their upkeep). However, they do provide important public visual amenity;
  - **Communal gardens** which are usually located between two terraces and shared by the residents of the terraces that define them. As either end of the communal gardens are left open to the street, they also provide public visual amenity; and
  - **Private rear gardens** relating to specific dwellings and accessible only to their inhabitants.
- 2•45 These contribute to the urban structure of the area, creating a rich rhythm of terraced buildings and open spaces.
- 2•46 Of further note is the Counter's Creek, one of London's 'lost rivers'. This former natural stream was first artificially channelled in 1827, when it started to become an integral part of London's sewerage infrastructure, and is now fully culverted.



Figure 2.19: Open spaces in and around the OA



# Open Space

2

- 2•47 Within the OA there is one identified area of biodiversity importance; a semi-natural green corridor running alongside the West London Line (more or less on the boundary between LBHF and RBKC). It has been classified as a Site of Nature Conservation Importance (Grade 1) in LBHF, although some of the corridor straddles the boundary into RBKC.
- 2•48 Figure 2.20 shows the sites of nature conservation importance in the vicinity of the OA.
- 2•49 Figure 2.21 illustrates that there is significant deficiency of publicly accessible open space within the OA itself.

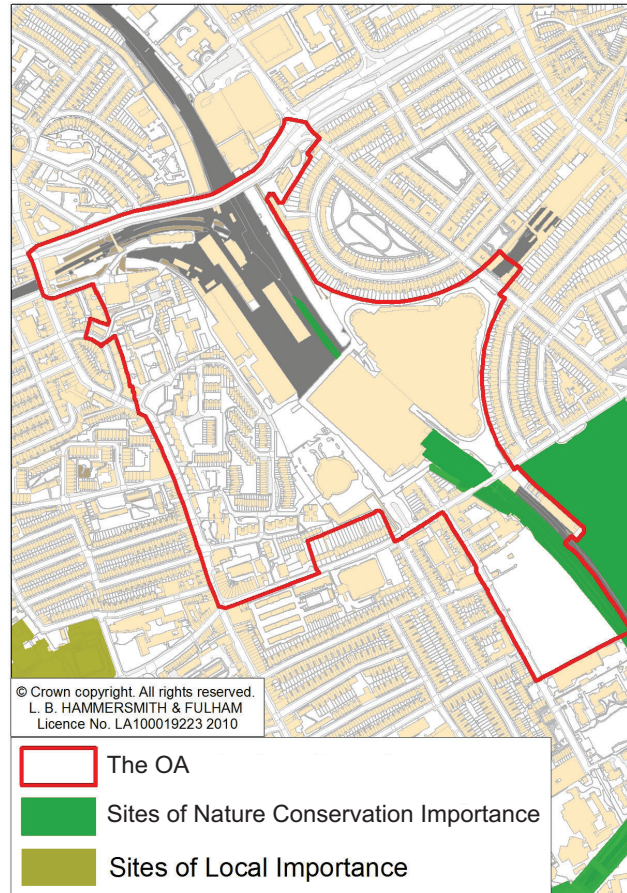


Figure 2.20: Sites of Borough and Local Importance in and around the OA

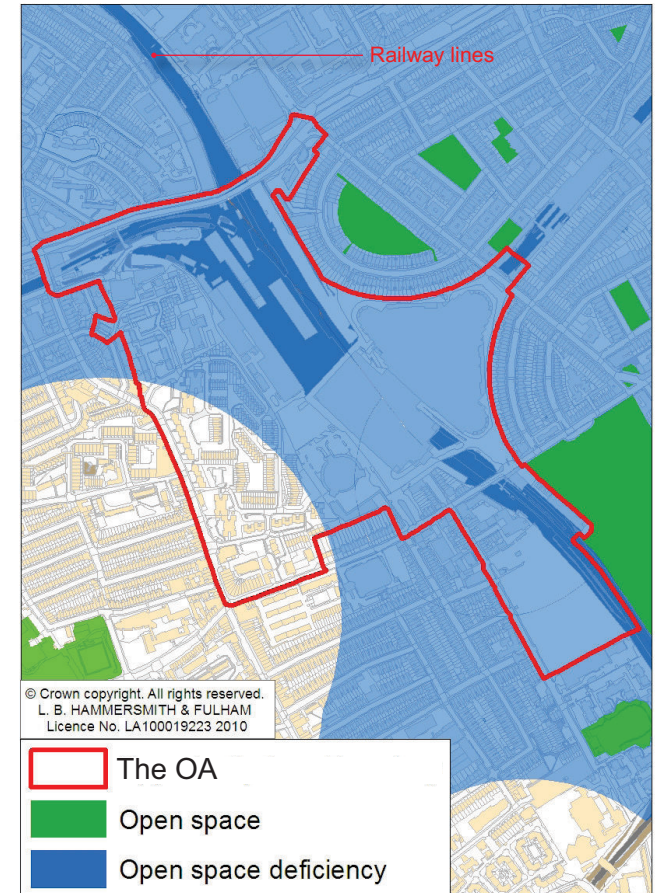


Figure 2.21: Open Space distribution in and around the OA

## Open Space

2•50 In terms of existing public provision, Normand Park, which is located to the south west of the OA, provides two hectares of public open space. To the south east of the OA is Brompton Cemetery. Whilst this is publicly accessible, it cannot be regarded as recreational open space in the usual sense and is therefore not considered to contribute to combating open space deficiency. Within the OA itself are several small pockets of publicly accessible open space, which are used for leisure and some children's play. These spaces are small, fragmented and are of a poor quality as they are incidental space left over following the design of the estates in the 1970s. The Core Strategies for both

local authorities identify much of the OA as deficient in publicly accessible open space, as shown in Figure 2.21. This deficiency reflects the lack of a large publicly accessible local park in this area.

2•51 Existing play provision is limited to the western extremities of the OA. Facilities for under 5s in the area are generally poor, consisting primarily of provision on housing estates, with the exception of the playspace in Normand Park. Two of these play spaces are on the West Kensington and Gibbs Green estates, which would be lost if estate redevelopment were to occur. Play provision for 5-11s is generally good. Two of the play spaces

are on the West Kensington and Gibbs Green estates, which would be lost of estate redevelopment were to occur. The provision for over 12s is good, consisting of the play spaces at Normand Park and two basketball courts on the West Kensington and Gibbs Green estates, which would again be lost if estate redevelopment were to occur. Of all the 8 play spaces in the vicinity of the OA only the play spaces at Normand Park and Alice Gilliat can be considered genuinely public, with the other six contained within housing estates.

Map Ref.	Facility	Age Group	Type	Distance from OA	Area	Condition / comments
1	Ivatt Place Playground	Under 5s, 5-11s	Equipped playground	Within the OA	1100sqm	Estate playground takes up a lot of land, but just 6 apparatus.
2	Gibbs Green Playground	Under 5s, 5-11s	Equipped playground	Within the OA	580sqm	Estate playground but with LEAP status
3	Basketball Court	12s+	Ball court	Within OA	570sqm	Ball court with tarmac surface
4	Basketball Court 2	12s+	Ball court	Within OA	280sqm	Ball court with tarmac surface
5	Alice Gilliat Playground	Under 5s, 5-11s	Equipped playground	150 metres	380sqm	Public playground but adjacent to a housing estate
6	Shuters Square Playground	Under 5s	Equipped playground	200 metres	90sqm	Very small and few apparatus
7	Vine Square	Under 5s, 5-11s	Equipped playground	100 metres	350sqm	Estate playground. Would meet former LEAP status
8	Normand Park Playground	All	Equipped playground	500 metres	2,000sqm	Public playground in local park

Table 2.1: The play spaces that serve and are accessible to the OA

## Land Use

2

- 2•52 Figure 2.22 shows the current ground floor land uses in and around the OA.
- 2•53 The 31 storey Empress State Building is situated immediately to the west of Earl's Court 2 and is the tallest building within the OA and indeed in much of West London. The building is currently occupied by the Metropolitan Police. To the north of Earl's Court Exhibition Centre 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 OA.
- 2•54 The West Kensington and Gibbs Green housing estates lie to the west of the Earl's Court Exhibition Centres and the TfL Lillie Bridge Depot. The larger West Kensington estate, containing 604 properties, was built between 1972 and 1974 and includes several slab blocks of 9, 10 and 11 storeys along with low rise flats, maisonettes

and terraced houses. The smaller Gibbs Green estate features 98 properties built in 1961 comprising 7 medium-rise blocks. The estates have poorly arranged internal roads and irregular placement of buildings surrounded by poorly utilised open space, particularly on the West Kensington estate. On-street and forecourt parking spaces dominate the streetscape of the estates. The overall proportion of social rented housing on the estates is 78 percent.

- 2•55 To the south of the OA is the Seagrave Road car park, which is a parcel of land situated adjacent to the West London Line. It covers an area of 2.9ha featuring a small number of temporary and semi-permanent utility structures.
- 2•56 There are a number of other smaller and/or ancillary land uses within the OA, namely:
- Gibbs Green school, which was previously a primary school but is currently being used to temporarily house Queensmill Special School;

- private residential houses, flats and maisonettes on Empress Place, Lillie Road and Seagrave Road;
- Registered Provider properties located around the West Kensington and Gibbs Green estates;
- a range of A1–A5 uses along Lillie Road, North End Road, Old Brompton Road and Seagrave Road, some with converted residential flats on the upper floors;
- a hotel, community centre and telephone exchange north of Lillie Road;
- a small area of commercial and light industrial uses to the south of Lillie Road;
- a bus turning and waiting facility on Lillie Road immediately adjacent to Earl's Court 2 and the Empress State Building; and
- the Clear Channel buildings and hoardings, plus laundry and mannequin-making facilities located south of West Cromwell Road.

# Land Use

Page 1102

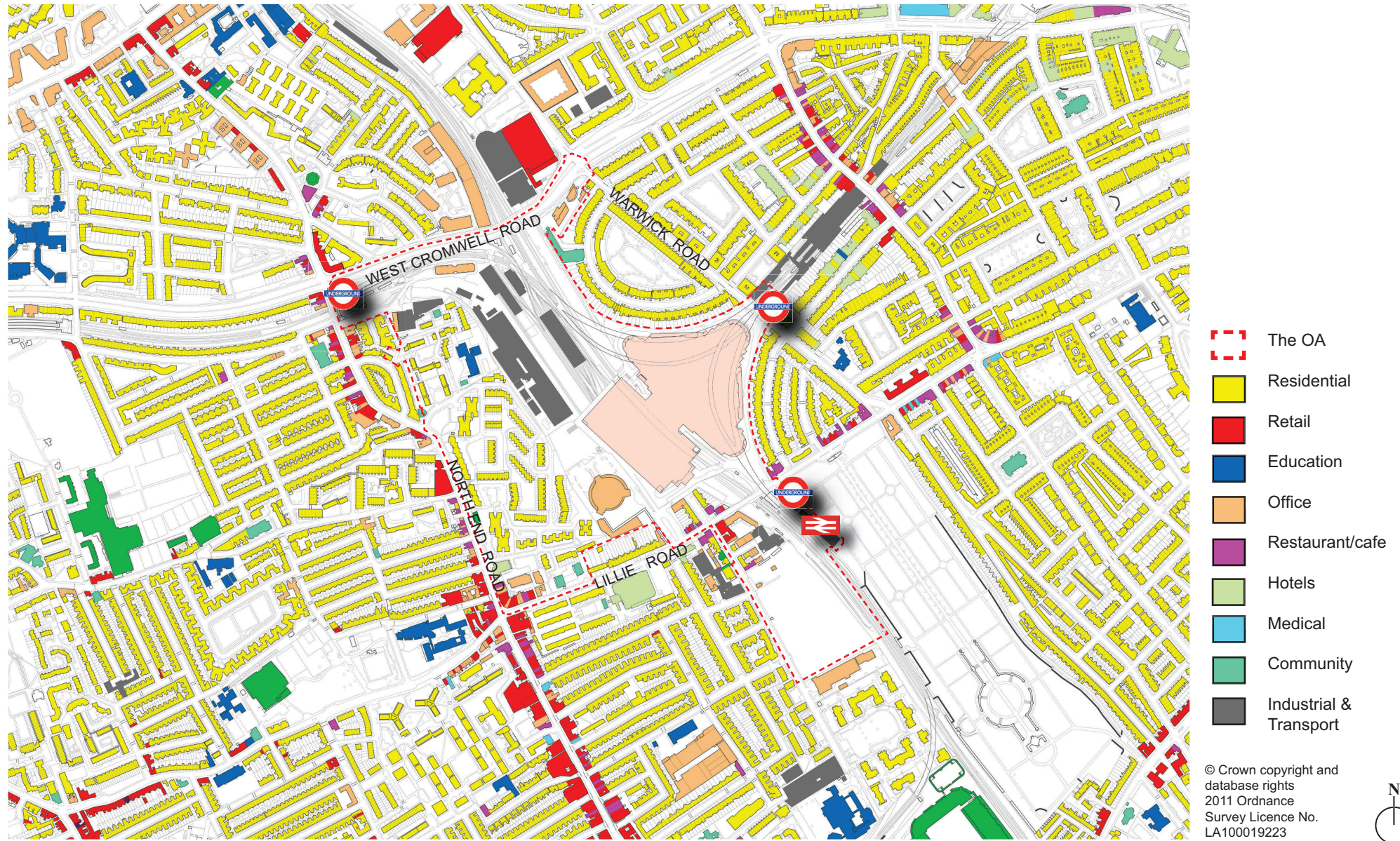


Figure 2.22: Ground floor land uses in the OA and its surroundings

## Housing

2

- 2•57 The area surrounding the OA is typically characterised by Victorian terraced housing and Edwardian mansion blocks, which are generally owner occupied or privately rented. There are also some post-war housing estates located to the east and north of the OA and some modern, purpose built residential premises to the north.
- 2•58 Within the OA, existing housing is primarily located within the West Kensington and Gibbs Green estates. Some properties are now leasehold or freehold having been purchased under the 'right to buy' scheme. Some private residential accommodation is also located to the south of the OA, on Empress Place, Lillie Road and Seagrave Road.
- 2•59 The West Kensington Estate was built between 1972 and 1974 and contains 604 dwellings. This consists of 463 flats and 141 terraced houses. 476 of the dwellings are socially rented, 89 are leasehold and 39 are freehold. The majority of dwellings are a mix of 1 and 2 bedroom flats, along with some larger 3 and 4 bedroom maisonettes and houses.
- 2•60 The Gibbs Green Estate was built in 1961 and contains 98 flats and maisonettes. 42 of these dwellings are leasehold. The remaining 56 dwellings are socially rented. All of the dwellings are 2 and 3 bedroom units.
- 2•61 In addition to the estate properties, a number of Housing Associations own property within the OA. Family Mosaic owns 42 homes in Dieppe Close, Lerry Close and Thaxton Road; London and Quadrant own 9 properties in Aisgill Avenue and Marchbank Road; and Shepherds Bush Housing Association own 7 properties in Garsdale Terrace. All of the Housing Association properties in the Opportunity Area are social rented.
- 2•62 Altogether, social rented housing comprises 78% of the total number of properties on the estates and Housing Association land. The rest of the properties (22%) have been bought by residents under the 'right to buy' scheme.
- 2•63 Table 2.2 shows the existing housing provision on the West Kensington and Gibbs Green Estates, along with other Housing Association provision in the area. Table 2.3 shows the tenure profile of the estates compared to other geographies.

# Housing

House Type	Gibbs Green		West Kensington			RSL	Totals
	Social Rent	Lease-holders	Social Rent	Lease-holders	Free-holders	Social Rent	
1 Bed Flat	0	0	163	21	0	4	<b>186</b>
1 Bed House	0	0	0	0	0	3	<b>3</b>
2 Bed Flat	32	29	180	56	0	6	<b>303</b>
2 Bed House	0	0	0	0	0	13	<b>13</b>
3 Bed Flat	24	13	22	11	0	0	<b>70</b>
3 Bed House	0	0	75	0	28	25	<b>128</b>
4 Bed Flat	0	0	8	2	0	0	<b>10</b>
4 Bed House	0	0	27	0	11	7	<b>45</b>
<b>Totals</b>	<b>56</b>	<b>42</b>	<b>475</b>	<b>90</b>	<b>39</b>	<b>58</b>	<b>760</b>
	57%	43%	79%	15%	6%	100%	

Table 2.2: Housing Size and Tenure within the existing estates and Registered Provider properties  
Source: West Kensington and Gibbs Green Estate Profile July 2010

Area	Owner-occupied	Council	RSL	Private Rented/other
West Kensington and Gibbs Green Estates	11.1%	70%	7.6%	7.2%
North End Ward	40.3%	20.7%	9.9%	29.1%
Hammersmith & Fulham	43.9%	19.2%	13.5%	23.4%
London	56.5%	17.1%	9.1%	17.3%

Table 2.3: Comparison of tenure profile  
Source: West Kensington and Gibbs Green Estate Profile July 2010 for Estate Data. Census 2001 for all other geographies.



Figure 2.23: Photograph of a housing block within the West Kensington Estate



Figure 2.24: Photograph of a housing block within the Gibbs Green Estate



# Social and Community Facilities

2

## Education

2•64 Figure 2.25 shows the locations of nursery, primary and secondary education provision within the vicinity of the OA. The former Gibbs Green primary school is located within the OA. This is currently being used as accommodation by a special school. There is an independent nursery to the south of the estates called the Kiddi Karu Nursery. LBHF's Infrastructure Study 2010 shows that current primary and nursery school provision in the area is at capacity.

## Health

2•65 Figure 2.26 shows the locations of hospitals, health centres and GP facilities within the vicinity of the OA. Within the OA itself there is a GP facility located at 82 Lillie Road which provides 10 consulting rooms. As part of NHS Hammersmith and Fulham's Estate Strategy, a new Centre for Health has opened on North End Road opposite the OA. This facility provides 1,200sqm of health floorspace and 10 consulting rooms and has been provided in order to facilitate the relocation of other GP facilities in the borough rather than increasing healthcare capacity in order to meet the needs of any regeneration proposals in the area.

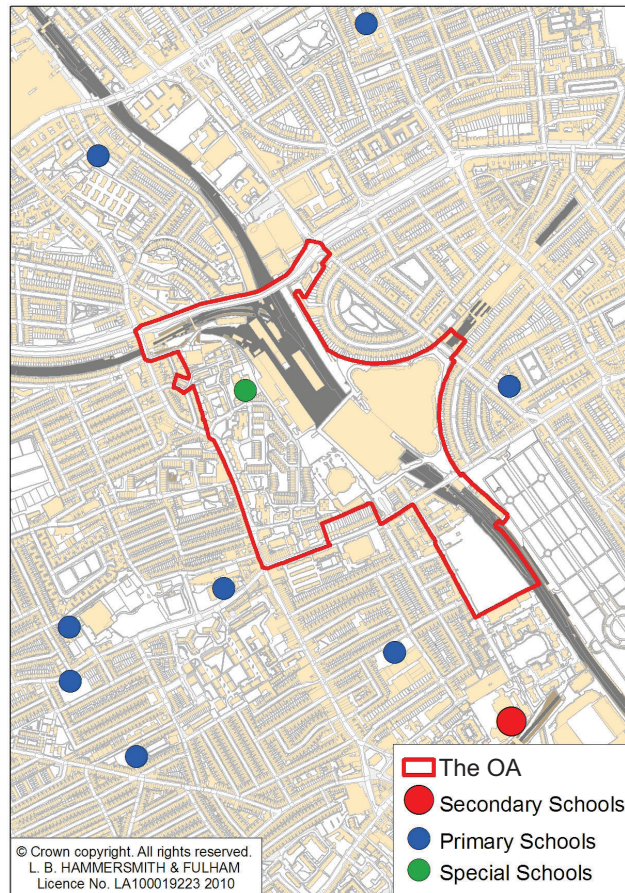


Figure 2.25: The locations of nursery, primary and secondary education provision within the vicinity of the OA

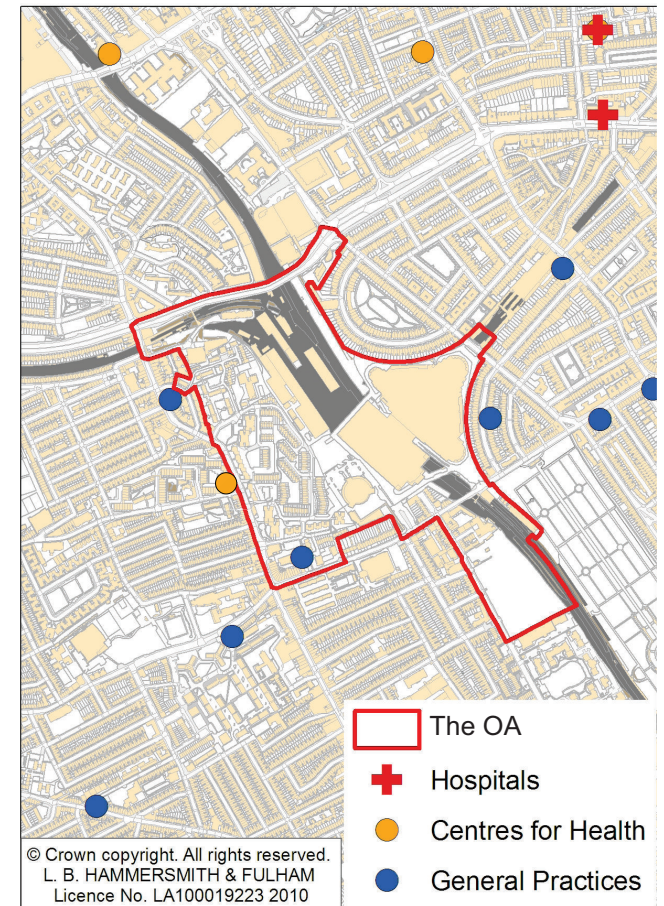


Figure 2.26: The locations of hospitals, health centres and GP facilities within the vicinity of the OA

## Retail

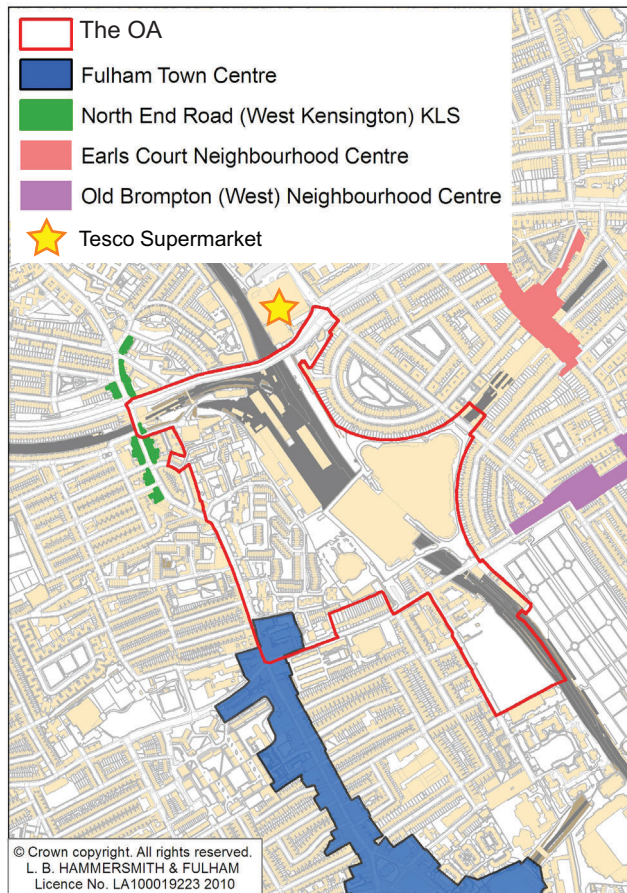


Figure 2.27: Retail centres in the vicinity of the Oa

2•66 Figure 2.27 shows that there are four shopping areas within the vicinity of the OA. The largest of these is Fulham Town Centre, which is designated as a Major Town Centre in the London Plan (2011) and extends to within the OA boundary. To the east of the OA is Earl's Court Road,

designated in RBKC's Core Strategy (2010) as a Neighbourhood Centre and in the London Plan (2011) as a District Centre. To the north-west of the OA is the North End Road (West Kensington) Key Local Shopping Centre and to the east of the OA is Old Brompton (West) Neighbourhood Centre.

2•67 Fulham Town Centre is situated at the southern end of North End Road and extends from Lillie Road to Fulham Broadway. Its main activity shopping (including the busy North End Road Market) and services for the local Fulham community. The centre has traffic congestion and car parking problems and has suffered from competition with surrounding centres (including Kensington High Street and Putney) and out of centre stores in Cromwell Road (Waitrose), Townmead Road (Sainsbury's) and Warwick Road (Tescos). It has lost not only elements of its retail business, particularly at the northern end of the centre, but also recreation and entertainment uses. Despite this situation, the centre has managed to attract a number of new retailers, food and drink establishments and cinemas and continues to provide an important focus for many residents.

2•68 Earl's Court Road is designated as a Neighbourhood Centre within RBKC's adopted Core Strategy (2010); a designation which recognises its scale and its primary function of serving the day-to-day needs of local people and those visiting the Exhibition Centres. It remains a vibrant centre providing a diverse range

of shops, restaurants, cafes and pubs. However, the centre has an 8.9% vacancy rate, which is higher than some other centres in the borough.

2•69 The North End Road (West Kensington) Key Local Shopping Centre also has a local function, providing a range of convenience shops and other services. In 2008, 54% of the uses within the centre fell within the A1 Use Class and there was a 12% vacancy rate. There is also some out of centre retail along the west side of North End Road, linking Fulham Town Centre with North End Road (West Kensington).

2•70 Old Brompton Road (West) is designated as a Neighbourhood Centre within RBKC's Core Strategy (2010). This centre is predominantly linear, running along Old Brompton Road between the junctions of Warwick Road and Earl's Court Road. The centre caters for local need, although it also provides a specialist comparison role in the form of DIY and interior design shops. The centre is generally attractive, with well kept shopfronts, wide pavements and limited street clutter. However, there is currently a 10% vacancy rate.

2•71 Further away from the OA there are several very important and successful higher order centres, such as Shepherd's Bush (including Westfield), Hammersmith, Kensington High Street, Notting Hill and King's Road. In addition to the local convenience function, these centres are also important comparison shopping destinations with a catchment that includes the OA.

## Socio-Economic Conditions

2

- 2•72 In 2007 most of the OA fell within the 30 percent most deprived areas in England as indicated by the Index of Multiple Deprivation (figure 2.28). The North End and Fulham Broadway wards are both ranked within the 10 percent most deprived wards in England with respect to income levels and barriers to housing and services. In particular, the Gibbs Green and West Kensington estates are both in the 10 percent most deprived neighbourhoods in LBHF, experiencing the highest levels of income and employment deprivation and very significant housing and services deprivation.
- 2•73 Neighbourhoods within the Earl's Court Ward by comparison are significantly less deprived on average, although this represents one of the lower income wards in RBKC outside of North Kensington.
- 2•74 The OA also suffers from higher unemployment than surrounding areas, with 22 percent of residents on the Gibbs Green Estate and 28 percent of residents on the West Kensington Estate claiming welfare benefits, compared to a LBHF average of 14 percent. There are also more long-term unemployed residents, with approximately 40 percent of unemployed residents claiming benefits for a period longer than 6 months compared to the LBHF average of 30 percent.
- 2•75 With regard to health, the residents of the Gibbs Green and West Kensington estates suffer from below average health outcomes and the area generally suffers from health deprivation.
- 2•76 Educational attainment on the West Kensington and Gibbs Green estates is significantly lower than the ward averages, with almost one third of adult residents having no qualification at all. LBHF audits of the Gibbs Green and West Kensington estates show that in 2008, 30 percent of the working age population had no educational qualifications and only 31 percent in the Gibbs Green Estate and 20 percent in the West Kensington Estate had university level qualifications (level 4 and 5 qualifications).

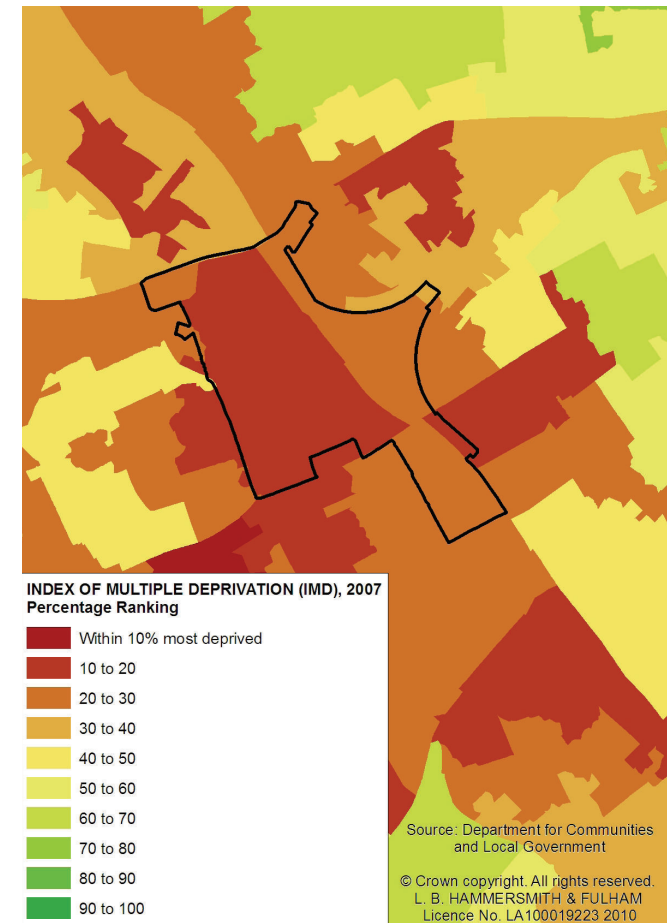


Figure 2.28: Index of Multiple Deprivation ranking in and around the OA

## Culture

- 2•77 The culture, leisure and entertainment value of the OA is provided within the Earl's Court Exhibition Centres One and Two. Over the years the Exhibition Centres have hosted numerous nationally and internationally renowned events / shows (such as the Motor Show, London Boat Show, Royal Agricultural Show, 'Crufts', the Royal Tournament, Ideal Home Show, BRIT Awards), musicians / bands (such as Take That, Pink Floyd, The Rolling Stones, Madonna, Queen, David Bowie, Kylie Minogue, and many more) and opera (such as Carmen and Aida). The Exhibition Centres will host the indoor volleyball during the 2012 Olympic Games.
- 2•78 Earl's Court Exhibition Centre 1 has an exhibition area of approximately 40,000m<sup>2</sup>, with a maximum capacity of 30,000 people. Earl's Court Exhibition Centre 2 has an exhibition area of approximately 17,000m<sup>2</sup>, with a maximum capacity of 12,000 people. The two centres also provide additional smaller exhibition, meeting and conference space in separate accommodation within the buildings.
- 2•79 The Exhibition Centres attract approximately 3 million visitors and 30,000 exhibitors each year. This major attraction makes a significant contribution to the local community, benefiting local hotels, restaurants, bars, taxi firms and local business who have adapted to cater for the needs of the exhibition centres.
- 2•80 Figure 2.29 shows the location of hotels in and around the OA. There is a high concentration of hotels within the vicinity of the OA and one hotel located within the OA itself at 295 North End Road.

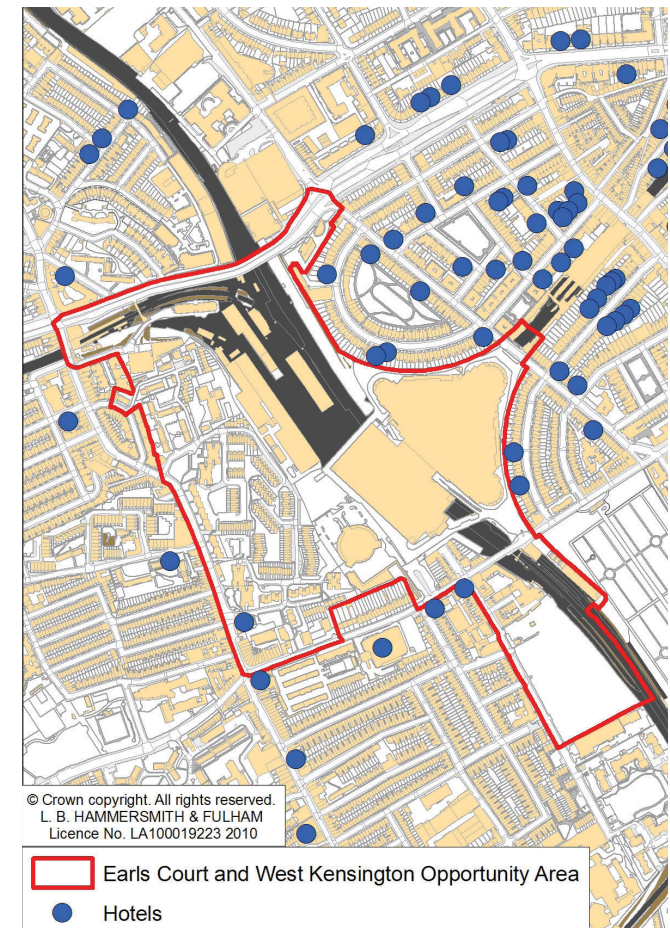


Figure 2.29: Existing hotel provision in and around the OA



# 03 VISION AND OBJECTIVES

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# Vision

3

- 3•1 This vision reflects and is based on the aspirations for the OA of LBHF, RBKC and the Mayor of London, as established by both boroughs' Core Strategies and the Mayor's London Plan. It is not intended to exclude any acceptable development options which would accord with the London Plan and the Core Strategies. The vision has been drafted with this in mind and would apply to any application coming forward in the OA.
- “West London’s New Urban Quarter”**
- 3•2 *“Residential led regeneration of the OA will result in a world class, environmentally sustainable new urban quarter that people will want to live in, work in and visit. The new community will be mixed and diverse, with quality housing provided to meet a range of incomes and contribute to the Capital’s needs and potential for growth.*
- 3•3 *The new urban quarter will capture the spirit of this part of London by continuing the legacy of the Earl’s Court ‘brand’ with a new cultural destination that will continue to draw visitors from across the Capital.*
- 3•4 *It will be integrated into the existing urban fabric and character of the surrounding area, respecting the heritage assets and the pattern of streets, buildings and open spaces. The environment created will be of high quality throughout, adopting the best of typical West London character and complementing it with the best of contemporary design. It will provide safe, stimulating, well managed neighbourhoods that are attractive, exciting and served by a first class, well connected network of streets and open spaces that encourage walking and cycling. For the first time in the OA, the two neighbouring boroughs will be connected through improved east-west connections.*
- 3•5 *The redevelopment of the area will incorporate sensitively designed, publicly accessible, green, open spaces, including a number of garden squares. They will offer a range of opportunities for both formal and informal play and recreation as well as enhancing the ecological value of the area. All public open spaces, play spaces, streets and buildings will be inclusive and accessible.*
- 3•6 *There will be a substantial increase in the number of homes in the area, with new housing for sale and rent at a range of prices and affordability. The Gibbs Green and West Kensington estates will be regenerated, with existing residents benefiting from greater housing choice, and higher quality, more suitable homes, designed with their needs in mind. All existing residents will be able to continue living in the area if they choose to do so, and the existing community will be enriched with a more varied, balanced and sustainable socio-economic mix.*
- 3•7 *Many people will choose to both live and work in the area, reducing the need for commuting and the subsequent demand on the public transport and road networks. Improvements to the road and public transport networks will be made to ensure that the impacts of development are minimised.*

## Vision

- 3•8 *The new urban quarter will make the most of its enviable location on the A4, equidistant between London's largest international airport at Heathrow, and London's economic heart in the West End and the City. As a result it will become an attractive and high profile location for both large and small businesses, from start-ups to established institutions.*
- 3•9 *Regeneration will have overwhelmingly positive effects in the surrounding area, increasing the economic health of local businesses, town and local centres and contributing to local employment and community needs, with a high proportion of the new jobs created being filled by local people.*
- 3•10 *The economic health of this part of North End Road will be revived with new shops, restaurants and services opening on its eastern side to create a two sided shopping street. Other retail and services to meet the day to day needs of new residents and workers will cluster around the existing tube stations on the edges of the OA and in a new centre within it. This new retail will complement rather than compete with existing retail centres, through careful management.*
- 3•11 *The new urban quarter will provide a number of community facilities to support the new living and working populations. This will include a new community hub with space to accommodate a range of multi functional community uses. The new quarter will also be supported by a new primary and secondary school, a health centre, affordable sports and leisure facilities and police infrastructure.*
- 3•12 *Outstanding environmental performance will be achieved by the use of low and zero carbon technologies, including renewable energy sources, a district heat network and combined heat and power. Sustainable approaches to mitigating waste, water management and controlling noise and air quality will also be introduced."*





## Key Objectives

3

### 3•13 Urban Form

- Maximise connectivity;
- Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces;
- Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;
- Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context;
- Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape; and
- Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

### 3•14 Housing

- Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

### 3•15 Employment

- Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

### 3•16 Retail

- New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and
- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

### 3•17 Culture

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

### 3•18 Social and Community facilities

- Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

### 3•19 Transport

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

## Key Objectives

### 3•20 Energy

- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

### 3•21 Environment

- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

### 3•22 Section 106 and Phasing Strategy

- Ensure a comprehensive approach to redevelopment of the OA; and
- Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.



Photo by Joe Miles

# Urban Form

3

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Figure 3.1: Illustrative diagram showing the main urban form aspirations that could be delivered as part of comprehensive regeneration of the OA. For illustrative purposes only.

# Land Use









-  The OA
-  Underground Stations
-  Overground Stations
-  **Predominantly residential:** All floors residential, but with scope for occasional convenience retail or social and community uses on lower floors
-  **Mixed use retail hubs:** Retail led mixed use clusters with some scope for small offices and social/community facilities. Upper floors predominantly residential.
-  **Mixed use commercial:** All floors could be commercial, predominantly large, discrete offices. Although there is also scope for hotels and some retail and residential uses.
-  **A new centre:** Zone in which main cultural destination will be found with some retail, social/community facilities and small to mid sized offices. Upper floors to be predominantly residential.
-  **Existing mixed use centres**



Figure 3.2: Illustrative diagram showing different land uses that could be delivered as part of comprehensive regeneration of the OA  
For illustrative purposes only

# Illustrative Masterplan

3

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Figure 3.3: Illustrative masterplan showing one possible way in which the Vision and Key Objectives could be achieved in the OA. More explanation of this illustrative masterplan can be found in the Development Capacity Scenarios SPD Supporting Document. For illustrative purposes only.

# Illustrative Land Use

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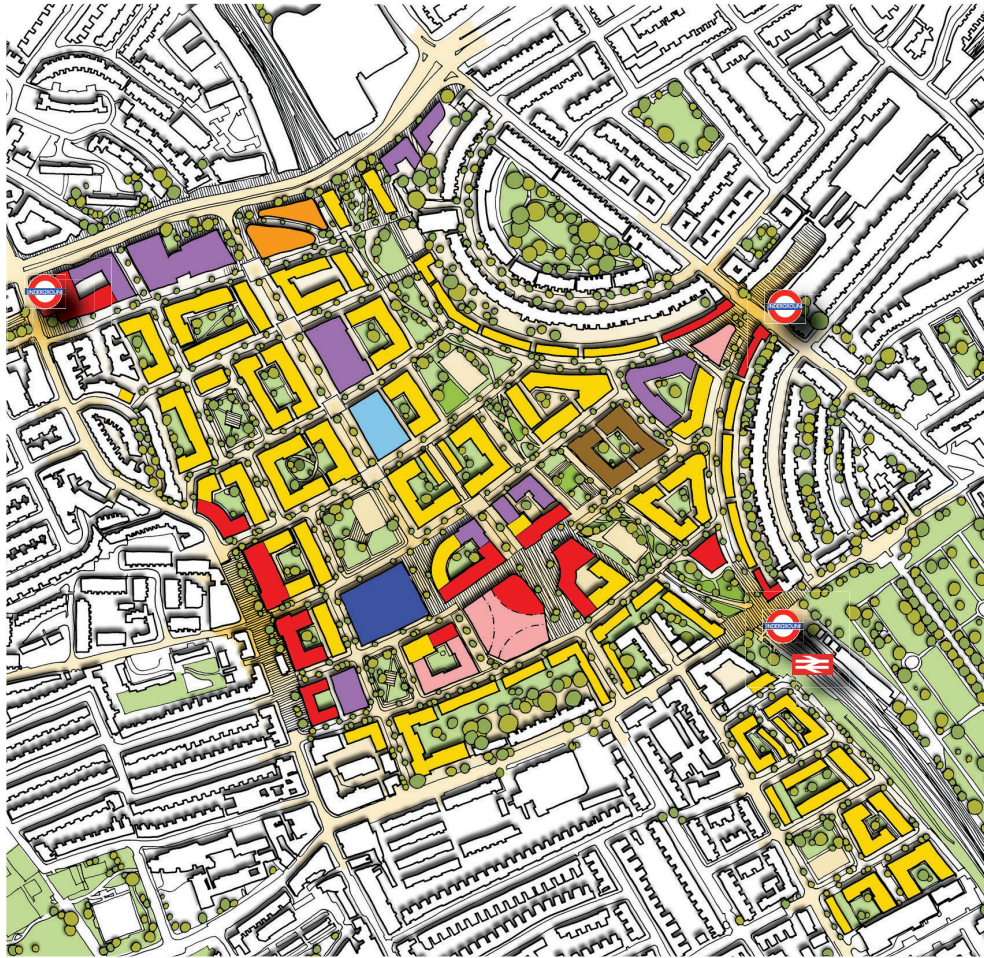


Figure 3.4: Illustrative masterplan showing one possible arrangement of ground floor land uses For illustrative purposes only.



Figure 3.5: Illustrative masterplan showing one possible arrangement of upper floor land uses For illustrative purposes only.

LAND USE KEY	
<span style="display:inline-block; width:15px; height:15px; background-color:yellow;"></span> RESIDENTIAL	<span style="display:inline-block; width:15px; height:15px; background-color:lightblue;"></span> HEALTH
<span style="display:inline-block; width:15px; height:15px; background-color:red;"></span> A1-A5 USES	<span style="display:inline-block; width:15px; height:15px; background-color:blue;"></span> EDUCATION
<span style="display:inline-block; width:15px; height:15px; background-color:pink;"></span> CULTURE & LEISURE	<span style="display:inline-block; width:15px; height:15px; background-color:orange;"></span> HOTEL
<span style="display:inline-block; width:15px; height:15px; background-color:purple;"></span> COMMERCIAL	<span style="display:inline-block; width:15px; height:15px; background-color:brown;"></span> COMMUNITY USES



Figure 3.6: The view towards the OA from Archel Road

# 04 URBAN FORM STRATEGY

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## Overview

4

### Key Objectives

- Maximise **connectivity**;
- Establish an **urban grain** within the OA that is inspired by the surrounding pattern of streets and open spaces;
- Provide good quality **public open space** that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;
- Ensure that new buildings on the **edges** of the OA are sensitively integrated into and enhance the existing context;
- Ensure that no new buildings visible on the **skyline** have a negative impact on the quality and character of the surrounding townscape; and
- Design well proportioned **streets** that respond to those in the surrounding area and encourage walking and cycling.

- 4•0 This Urban Form Strategy establishes a spatial framework, based on six Key Objectives (left) to deliver a quality new urban quarter.
- 4•1 The Key Principles are set out under each Key Objective and are followed by diagrams and photographs to suggest how they could be achieved. At the end of this chapter there is also guidance on how the OA could be divided into a number of different illustrative development parcels, each delivering the appropriate Key Objectives.
- 4•2 This Urban Form Strategy is supported by the following SPD Supporting Evidence Documents:
- Character Area Analysis;
  - Townscape and Visual Analysis;
  - Edges Study; and
  - Development Capacity Scenarios.

## Context

- 4•3 The OA itself is dominated by the Empress State Building, the Earl's Court Exhibition Centres and railway infrastructure. The surrounding area consists of a much more finely grained urban structure with a number of formal garden squares, communal gardens and private rear gardens. The predominant residential building typologies around the OA include town houses, terraced town houses, mansion blocks, mews houses and infill blocks.
- 4•4 Within the OA there are a number of significant barriers to movement, particularly the West London Line which runs along the boundary between LBHF and RBKC and prevents east-west connectivity between the boroughs. The OA also features some very distinctive topographical conditions formed by the railway infrastructure.
- 4•5 In and around the OA a significant deficiency of publicly accessible open space has been identified.
- 4•6 There are 19 conservation areas in and around the OA, including Brompton Cemetery. There are also a number of sensitive long distance views, particularly those identified in the RBKC Building Heights SPD, which may be effected by development in the OA. Any development will be required to respect the character and appearance of its surroundings and all heritage assets.

## Policy Context

### 4•7 The Mayor's London Plan (2011):

- 'Quality and design of housing developments' (Policy 3.5);
- 'Children and Young People's Play and Informal Recreation Facilities' (Policy 3.6);
- 'Large residential developments' (Policy 3.7);
- 'Building London's neighbourhoods and communities' (Policy 7.1);
- 'An Inclusive Environment' (Policy 7.2);
- 'Designing Out Crime' (Policy 7.3);
- 'Local Character' (Policy 7.4);
- 'Public Realm' (Policy 7.5);
- Location and design of tall and large buildings' (Policy 7.7);
- 'Heritage assets and archaeology' (Policy 7.8);
- 'Heritage-led regeneration' (Policy 7.9);
- 'Implementing the London View Management Framework' (Policy 7.12); and
- 'Protecting Local Open Space and Addressing Local Deficiency' (Policy 7.18).

### 4•8 LBHF's Core Strategy (2011):

- 'Built Environment' (Policy BE1);
- 'Strategic Site and Housing Estate Regeneration Area - FRA 1'; and
- 'Improving and Protecting Parks and Open Spaces' (Policy OS1).

### 4•9 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' (Policy CA7);
- 'Biodiversity' (Policy CE4);
- Context and Character' (Policy CL1);
- 'New Buildings, Extensions and Modifications to Existing Buildings' (Policy CL2);
- 'Heritage Assets - Conservation Areas and Historic Spaces' (Policy CL3);
- 'Heritage assets – Listed Buildings, Scheduled Ancient Monuments and Archaeology' (Policy CL4);
- 'Amenity' (Policy CL5);
- 'Street Network' (Policy CR1);
- 'Three-dimensional Street Form' (Policy CR2);
- 'Street and Outdoor Life' (Policy CR3);














- 'Streetscape' (Policy CR4);
- 'Parks, Gardens, Open Spaces and Waterways' (Policy CR5);
- 'Trees and landscape' (Policy CR6); and
- 'Servicing' (Policy CR7).

### 4•10 RBKC's 'Building Height in the Royal Borough' SPD.

### 4•11 English Heritage's and CABE's Guidance on Tall Buildings (2007).

### 4•12 English Heritage's 'The Setting of Heritage Assets' (2011).

# Connectivity and Urban Grain

- - - The OA
-  Underground Stations
-  Overground Station
-  Streets within surrounding area that could be extended
-  Potential east-west routes across the OA
-  Important connection between Star Road and the OA
-  Potential north-south routes across the OA
-  Potential north-south pedestrian and cyclist connection(s) that could be created by decking over the railway lines
-  Potential crescents replicating existing street pattern
-  Existing pattern of garden squares
-  Special landmarks in the existing context, views of which should be retained
-  Area in which a connection to A4 could be made
-  Potential pedestrian/cyclist only connections from A4 into the OA
-  Potential to explore the use of the link under A4 by pedestrians and cyclists and/or as a temporary construction traffic route

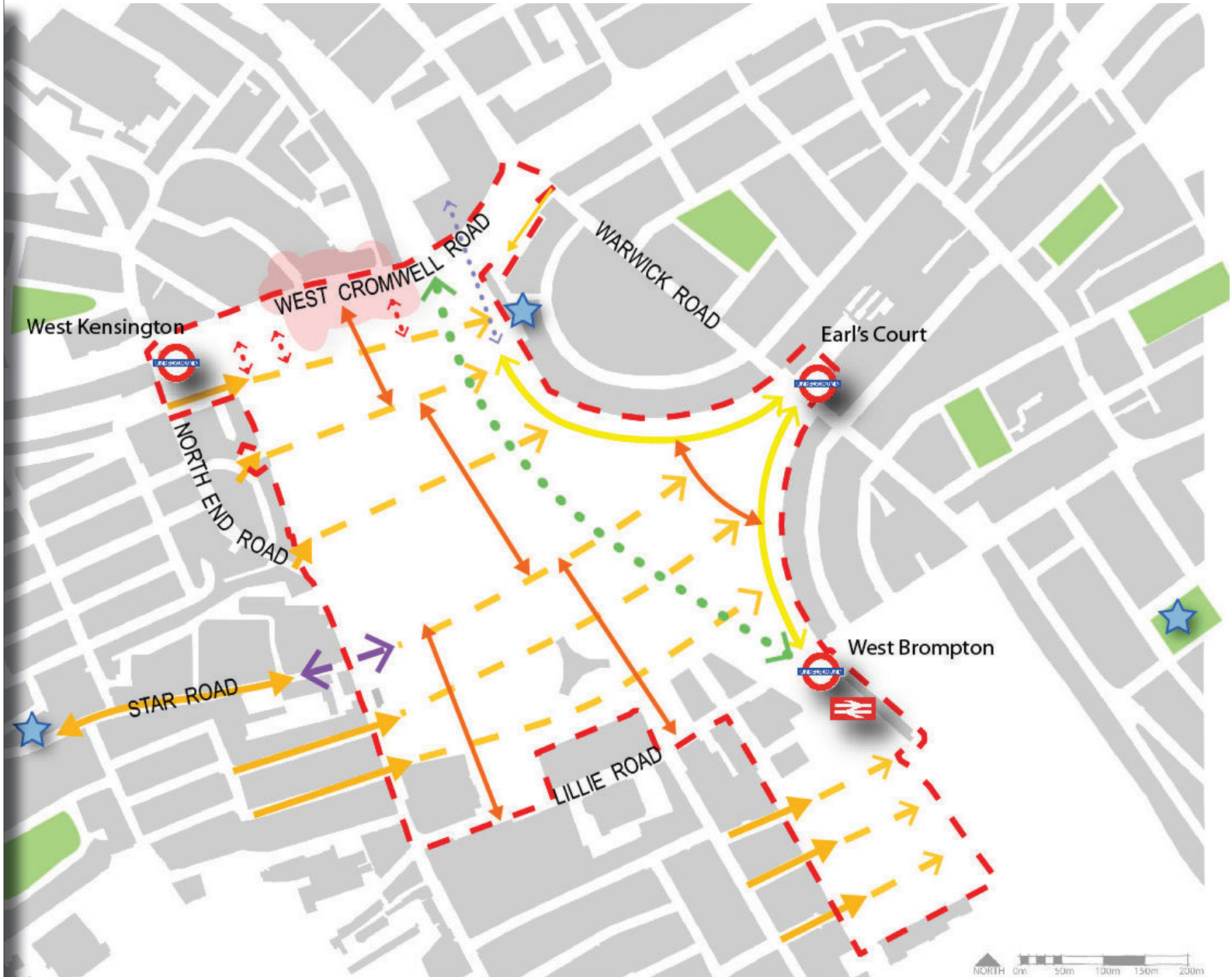


Figure 4.1: Illustrative diagram showing the potential to establish maximum connectivity and a suitable urban grain within the OA

## Connectivity and Urban Grain

### Key Objective

Maximise connectivity.

- 4•13 At present, the OA can be thought of as an 'island' in the urban fabric. It is so disconnected that there is no way for people to move across it directly between the two boroughs. Severance is caused by the railway lines, the Exhibition Centres and the changes in ground level that currently exist across the OA.

### Key Objective

Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces.

- 4•14 It is easier for people to find their way around an area when the design of streets responds directly to their role in a well defined street hierarchy. There is already a well defined street hierarchy surrounding the OA (see Figure 4.2) into which the new streets will be expected to integrate.

### Key Principle UF1:

Introduce a number of new east-west and north-south connections across the OA that overcome the existing severance.

### Key Principle UF2:

Create east-west connectivity between Warwick Road and North End Road at an early phase of development.

- 4•15 Overcoming the existing severance is one of the fundamental aims of regeneration in the OA. Figures 4.36 to 4.39 suggest an approach to parcelling up the development in a manner that could achieve east-west connectivity in an early phase.
- 4•16 Even if comprehensive regeneration of the entire OA never happens, the authorities will expect east-west connectivity to be delivered. Therefore, any application for development within the OA will be expected to contain contingency plans that demonstrate how this can be achieved if later phases are not progressed.

### Key Principle UF3:

Establish a clear and well defined network of streets providing a variety of environments and a choice of routes. The urban grain of new streets proposed for the OA should be inspired by the street types and patterns identified in the best of the surrounding context.

- 4•17 Proposals that replicate the distinctive street alignments found in the OA's surroundings are encouraged.
- 4•18 The existing street hierarchy can be categorised into Primary, Secondary and Tertiary Streets. Primary Streets define neighbourhoods and connect them with the wider city. Secondary Streets form the majority of the urban grain and subdivide the neighbourhoods into urban blocks. Tertiary Streets create extra local connections.
- 4•19 The Primary Streets that currently surround the OA should be sufficient to define the new neighbourhood and connect it with the wider city. Therefore, in order to establish a suitable urban grain in the OA, no new Primary Streets will be expected. However, in traffic capacity terms some streets may become more dominant than others and should be designed accordingly, with due care being taken to avoid the creation of new vehicular 'rat runs'. A number of new Secondary and Tertiary Streets should be provided.

## Connectivity and Urban Grain

4

4•20 New Secondary Streets should form a permeable, generally orthogonal grid (i.e. a grid that is based on right angles and perpendicular streets). The existing street patterns in the surrounding area tend to have a number of strong, orthogonal east-west connections and fewer, often more

broken up, north-south connections.

4•21 New Tertiary Streets should ensure that the urban grain is fine. They should prioritise very local movement, particularly by pedestrians and cyclists and should contribute to informal play provision.



### Key Principle UF4:

Extend existing streets into and through the OA.

4•22 There are a number of existing streets that could be extended into and through the OA as part of comprehensive regeneration including:

- Archel Road;
- Chesson Road;
- Baron's Court Road;
- Merrington Road;
- Halford Road;
- Hildyard Road;
- Beaumont Crescent;
- Beaumont Avenue; and
- Star Road.

4•23 If these existing streets are extended, care should be taken to respect existing dimensions, building heights and enclosure ratios.

4•24 The direct extension of Star Road into the OA is considered particularly important as it has the greatest potential to connect the new neighbourhood to the wider context in the west. This connection must therefore be delivered and it must be delivered in the earliest phase possible.

4•25 Extending the urban grain should exploit all opportunities to strengthen connections between the OA and Fulham Town Centre, ensuring that activity levels are focused on North End Road and do not take footfall away from existing shops and businesses.

## Connectivity and Urban Grain

### Key Principle UF5:

Extend the existing pattern of garden squares found around the OA into the new neighbourhood and use their most successful features as design precedent for new publicly accessible green open spaces.

- 4•26 New gardens squares in the OA should take the existing squares in the surrounding area as their design precedents. Design features may therefore include:
- active streets (accommodating vehicles, pedestrians and cyclists) defining all four edges of the garden squares;
  - garden squares framed by predominantly residential buildings;
  - visually permeable boundary treatments (such as hedges or railings) used to ensure garden squares offer visual amenity to the surrounding streets;
  - a grand sense of scale created by substantial mature trees; and
  - the inclusion of games courts, like the tennis courts at Queens Club Gardens.
- 4•27 Contemporary garden squares that adopt the most positive characteristics of the traditional garden squares, but also meet 21st Century demands are encouraged. In order to meet contemporary demands, new publicly accessible green open spaces should differ from existing garden squares in the following ways:
- they should be publicly accessible to

everyone;

- there should be no private rear gardens backing onto publicly accessible spaces;
- they may spill out into shared surface streets around their edges in order to become a more active part of the public realm; and
- mature trees are encouraged, and could be used to create shade, but they should not leave open spaces dark and/or overshadowed.



Figure 4.3: Aerial photograph highlighting existing garden squares in the OA's immediate surroundings

### Key Principle UF6:

Retain and/or improve views of special existing local landmarks.

- 4•28 There are three views of special local landmarks (St. Andrew's Church, St. Cuthbert's Church and St. Luke's Church) that the authorities are keen to retain and improve (see Figure 4.4). This will both aid legibility and knit the new development into its existing context. The heights of the buildings that frame the views of these landmarks should not undermine their status as wayfinding markers.

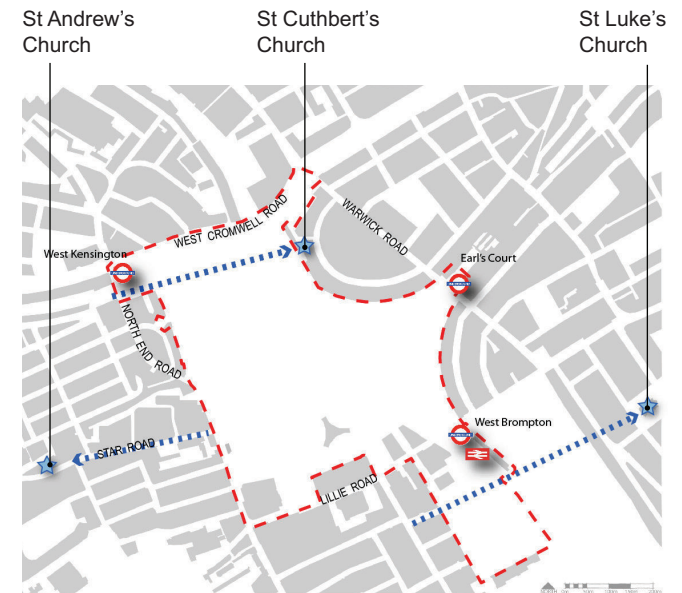


Figure 4.4: Illustrative diagram showing views of the special existing landmarks that the authorities have identified

## Connectivity and Urban Grain

4

### Key Principle UF7:

Create new view compositions in the OA that complement those identified in the surrounding area and aid navigation and way finding.

- 4•29 The Character Area Analysis SPD Supporting Evidence document identifies a number of successful view compositions and landmark buildings that create distinct places and assist with wayfinding. This includes a number of well enclosed long views (see Figure 4.5) and a number of views deflected off corner buildings (see Figure 4.6). Creating new view compositions like these within the OA will not only help to integrate the new development into its surroundings, it will also help people to find their way around, as well as adding to the visual interest.



Figure 4.5: An example of a well enclosed long view, looking down Redcliffe Gardens to a 'view terminating' building



Figure 4.6: An example of a deflected view, looking down the gently curving Hogarth Road to the corner building on Knaresborough Place

### Key Principle UF8:

Introduce a deck structure over the railway lines in order to enable an acceptable number of east-west connections to be made. If this proves not to be viable, a series of bridges over the railway lines could be acceptable.

- 4•30 Achieving the authorities' connectivity aspirations will require either decking or bridging over the West London Line and the District Line of the London Underground.
- 4•31 Bridging over the railway lines in a number of discrete locations would result in the majority of the railway lines remaining exposed. This could result in intrusive noise levels in the new development.
- 4•32 Alternatively, east-west connectivity could be achieved by introducing more extensive decking over the entire railway. The deck could be used for either buildings or for the creation of open space. Either way, its long term structural integrity must be guaranteed. Any open space created on top of the deck must exploit the opportunity to create new, direct north-south connections.
- 4•33 Whether the top of a deck is used for open space or buildings, it must not compromise connectivity. Any open space should be permeable, and there should be new routes created around and across it that are accessible for all road users. The creation

## Connectivity and Urban Grain

of 'dead ends' should be avoided.

- 4•34 At present, the land adjacent to the railway line carries significant biodiversity value. If it is decked over, this must be replaced and enhanced through an open space strategy. Please refer to the Environmental Strategy (Chapter 12) for further detail.
- 4•35 Whether the railway line is decked over or bridged over, tangible links with the past could be created by tracing its alignment (which is also the alignment of the now culverted Counters Creek) and leaving parts of the railway line exposed.



Figure 4.8: The railway line at the West Kensington platforms

### Key Principle UF9:

Increase pedestrian connectivity from the A4 into the OA.

- 4•36 At present, the A4 has a very hostile pedestrian environment. As part of comprehensive regeneration, this should be improved with high quality planting and landscaping and other streetscape improvements. The new buildings that front onto the A4 should not create an oppressive 'mono-elevation'.

- 4•37 Only one vehicular connection from the OA to the A4 is expected. However, this should be complemented by additional pedestrian routes from the footway along the southern edge of the A4 into the OA in order to increase visual as well as physical permeability. Such routes must be well overlooked and should include entrances to buildings.



Figure 4.9: Poor quality public realm on the A4 edge of the OA



Figure 4.7: The railway line, looking south from EC2



# Public Open Space



Figure 4.10: Illustrative diagram showing the potential distribution of open space throughout the OA

# Public Open Space

## Key Objective

Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities.

## Key Principle UF10:

High quality civic spaces should be well integrated into the proposed urban grain, especially in those locations that are expected to have high levels of movement and activity and where appropriate ground floor land uses are proposed.

## Key Principle UF11:

New public open spaces within the OA will be expected to provide for a mix of different leisure pursuits including sports pitches, children's play, court games, passive recreation, community gardening and nature conservation.

- 4•38 As set out in the Site Context Chapter, much of the OA and its surroundings are deficient in publicly accessible open space. There is also limited access to play facilities. Although Brompton Cemetery is large, it does not contribute sufficiently to formal recreation provision to combat the open space deficiency. Of all the surrounding garden squares, only Redcliffe Square is publicly accessible.
- 4•39 There are a number of Sites of Nature Conservation Importance (SNCI) in the OA. Please see Figure 4.11.

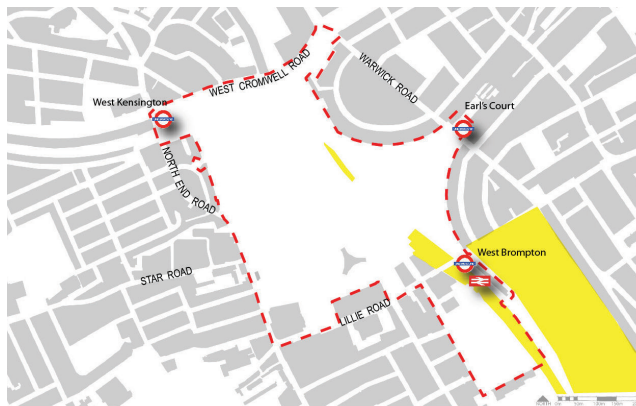


Figure 4.11: Existing Sites of Nature Conservation Importance in the OA

- 4•40 The opportunity to improve the public realm outside each of the existing underground stations and to provide welcoming civic spaces at the 'gateways' into the OA should be explored. The Culture Strategy (Chapter 8) also requires civic spaces to be provided in relation to the new cultural destination.
- 4•41 Retail, cafe, culture and community uses should be located on the ground floor around civic spaces to provide them with life and activity.
- 4•42 As set out in the transport chapter, civic spaces outside underground stations will be expected to enhance the potential for transport interchange.
- 4•43 Of particular significance is the potential for a new pedestrian focused civic space outside Earl's Court Station, as established in RBKC's core strategy. This "*open urban square*" will need to accommodate the significant changes in level that occur in this location whilst maintaining a comfortable gradient for pedestrians. Introducing a welcoming sense of arrival and vibrant, lively public functions in this location could contribute to the continuation of the 'Earl's Court Brand'.
- 4•44 Open space is an important community resource, which creates opportunities for leisure, recreation, play, ecology, natural drainage and improves visual aesthetics. It is key to many issues such as health and biodiversity. The provision of playing pitches, courts and play spaces will help to combat obesity, particularly in children. Some of the open space should also consist of space for community gardening in line with Policy 7.22 of the Mayor's London Plan (2011).
- 4•45 Management arrangements will be secured to enable public open spaces to be used at all reasonable times by all members of the public.
- 4•46 The open spaces within the OA will also be expected to meet the requirements established in the Environment Strategy in relation to nature conservation, biodiversity, and Sustainable Urban Drainage Systems (SUDS). Ecological spaces should be provided in addition to the publicly accessible green open space and recreation quotas set out in this SPD.

## Public Open Space

4

### Key Principle UF12:

Any proposal for comprehensive regeneration will be expected to include a publicly accessible local park of at least 2 hectares, either as one discrete park or as a series of contiguous smaller spaces that meet the criteria set out in Table 7.2 of the Mayor's London Plan (2011).

- 4•47 Existing green spaces surrounding the OA tend to be small and well integrated into the very permeable urban grain. A wholly contained and undissected two hectare open space would not necessarily complement this. Therefore, proposals for a series of *contiguous* publicly accessible green open spaces that combine to make the offer of linear 2ha local park are encouraged. There are many advantages to this 'linear park' approach including the potential to:
- improve north-south connectivity for pedestrians and cyclists;
  - maximise doorstep access to open space and the aesthetic benefits that parks afford;
  - accommodate a diverse range of recreational activities;
  - ensure that permeability is not compromised, even if the open spaces are locked at night;
  - communicate the historical legacy of the OA by tracing the course of the culverted Counters Creek; and
  - ensure that development provides diverse publicly accessible, green, open space in

every phase.

- 4•48 Furthermore, a linear park approach has considerable potential ecological benefits. Although decking over the railway line may involve the loss of a SNCI, this loss can be mitigated if that deck is used to create a continuous biodiversity habitat. As such, a linear park on the deck over the railway would address Policy CE4 of RBKC's Core Strategy (2010) which states that the council will "*require that development proposals create opportunities to extend or link Green Corridors*".
- 4•49 The land area of SNCI lost by any decking should be reprovided in addition to the 2ha recreational open space.
- 4•50 Any proposal for a 'linear park' must include publicly accessible, green, open spaces that are wide enough to accommodate a range of functions, including full size games courts and sports pitches. It is therefore possible that if a proposal comes forward including a linear park, land take greater than 2ha will be required in order to ensure the park is fully functional.
- 4•51 Locating publicly accessible open spaces next to uncovered railway lines may result in unacceptable noise levels and risks to personal safety and should therefore be avoided.

### Key Principle UF13:

As far as possible, all residential properties should be within 100m walking distance of a publicly accessible green open space.

### Key Principle UF14:

Any regeneration proposal should provide a minimum of 10m<sup>2</sup> of publicly accessible green open space per child.

### Key Principle UF15:

Any regeneration proposal should provide a minimum of 10m<sup>2</sup> of dedicated play space per child.

- 4•52 There is no guidance at either regional or local level that sets out what overall quantity of public open space should be provided by a development of this size. The Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008) sets out standards for access to play. Standard B.2 within this SPG states that "*a minimum of 10sqm of dedicated playspace per child (existing and new provision) is recommended as a basis for assessing existing and future provision*". It is considered that this provides a useful aggregation for the calculation of the overall quantity of public open space provision. Children under the age of five from houses with private gardens must not be discounted when assessing the publicly accessible green open space required by

## Public Open Space

### Key Principle UF14.

- 4•53 Any quantum of publicly accessible green open space that is required over and above the 2ha local park should be provided in the form of garden squares that observe the design criteria set out under Key Principle UF5.
- 4•54 Key Principle UF15 is also based on the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). Children under the age of five from houses with private gardens may be discounted when assessing dedicated play space requirements.
- 4•55 LBHF and RBKC are both densely developed and highly urbanised. In areas such as this, it is essential that redevelopment opportunities incorporate the provision of safe, stimulating play facilities.



Figure 4.12: Community gardening at Normand Park

### Key Principle UF16:

Development in the OA will be expected to provide play facilities for all ages to address the local deficiency. Both naturalistic and equipped play will be expected, and provision for differing age groups should be co-located where appropriate in order to make supervision more practical for families. The authorities will secure the provision of equipped play that meets the location standards set out in Table 4.1 and that is of a size that adequately caters for children within its catchment.

- 4•56 Given the current deficiency in play provision, the scale of development proposed in the OA and the likely uplift in numbers of young people, play space must be provided on-site to meet the needs of all ages. Therefore, a Play Strategy must be submitted with any application for the OA and any subsequent detailed applications must show the location of play areas and how these address the deficiency. Any proposals for open space and/or play space must consider the needs of disabled children and children with other special needs.
- 4•57 All 'pocket parks' (small areas of open space distributed throughout the public realm) should provide play space for under 5s. Some of the larger open spaces should provide play spaces for 5-11s and the 2 ha local park should provide play facilities for all ages including 12+. The maximum

distance that each of these age groups should be expected to walk to access a play space are set out in Table 4.1.

Age Group	Maximum walking distance from residential unit (taking into account barriers)
Under 5s	100m
5 – 11 year olds	400m
12+	800m

Table 4.1: The standards for play set out in The Mayor of London's SPG on Providing for Children and Young People's Play and Informal Recreation (2008)

### Key Principle UF17:

A phasing strategy that demonstrates how all of the publicly accessible green open space requirements will be met must be submitted with any application. It is expected that it will be delivered incrementally so that each phase has proportionate publicly accessible green open space to accommodate the increasing living and working populations.

### Key Principle UF18:

All open spaces should be built and managed to Green Flag Award standards.

- 4•58 The Green Flag Award scheme provides benchmark national standard for parks and green spaces in the UK.

## Skyline

4

### Key Objective

Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape.

- 4•59 Development within the OA will create a new skyline that should enhance the existing context.
- 4•60 At present, there are several buildings in the OA which are significantly taller than those in the surrounding area and therefore have an impact on the skyline (see Figure

4.13). For example, the exhibition centres are large footprint, large span buildings with dominant roofscapes rising to a considerable height when compared with the surrounding context. However, as redevelopment will be residential led, it will introduce very different building typologies. Therefore, the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals. The location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape.

### Key Principle UF19:

Preserve or enhance the character, appearance and setting of surrounding conservation areas and listed buildings.

- 4•61 Buildings that are visible on the skyline can be harmful for listed buildings and their settings, conservation areas, historic parks and significant views. Development proposals, including those containing tall buildings, must respect the character and appearance of their surroundings.

### Key Principle UF20:

Preserve or enhance the character, appearance and setting of Brompton Cemetery and its listed buildings.

- 4•62 Brompton Cemetery is a conservation area, the setting of listed buildings and monuments (which are listed in English Heritage's List of Buildings of Special Architectural or Historic Interest), a registered 'park and garden' of special historic interest (Grade I listed) (as described in English Heritage's Register of Parks and Gardens: Cemeteries) and Metropolitan Open Land. The views from Brompton Cemetery are panoramic and open and as a result, even new buildings of only moderate height may be visible. Therefore, any applications for redevelopment will be expected to preserve or enhance the inherent characteristics of



Figure 4.13: Heights of the tallest existing buildings in the OA. \* Heights are expressed in meters Above Ordnance Datum (AOD). The Ordnance Datum is a set level above which all heights are measured. This means that the significant topographical changes across the OA do not effect the measurements.

## Skyline

the cemetery setting whilst also improving the enclosure on the western boundary.

- 4•63 The opportunity to improve the enclosure of the cemetery is highlighted in RBKC's Conservation Area Proposals Statement, which states that *"Formal set-pieces such as the neat and open war graves section contrast with less well defined locations such as the flanked Chelsea Pensioners monument and with recent internments. These latter areas fail to provide sufficient enclosure where it is most needed on the western boundary"*. Therefore, proposals on the eastern edge of the Seagrave Road site should introduce new buildings that enclose, but do not over dominate, the western edge of the cemetery and, as a result, enhance the character of the

conservation area.

- 4•64 Financial contributions will be sought for enhancements to Brompton Cemetery where directly relevant and in scale and kind to any development proposals.



Figure 4.14: One of the views from Brompton Cemetery tested in the Townscape and Visual Analysis supporting evidence document

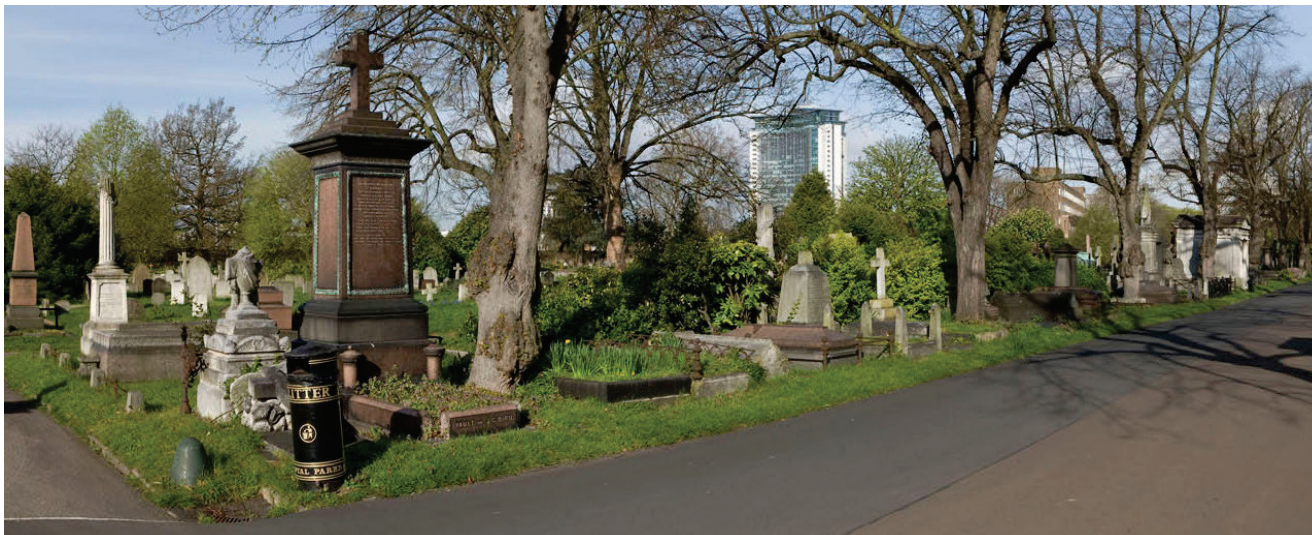


Figure 4.15: One of the views from Brompton Cemetery tested in the Townscape and Visual Analysis supporting evidence document

### Key Principle UF21:

All proposals will be expected to demonstrate that they do not have a negative impact on the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Therefore all applications must be accompanied by a set of verified views from the points identified in that document and a thorough analysis of the impact that proposals will have on them.

Where a scheme has a specific impact, not already covered by the Townscape and Visual Analysis SPD Supporting Evidence Document, further verified views will be sought.

- 4•65 As set out in the Townscape and Visual Analysis SPD Supporting Evidence Document, there are a limited number of exceptional views within the OA's surroundings from which it will not be appropriate for any new building to be visible on the skyline. However, for the majority of the views, the authorities may accept some new visible buildings if acceptable urban design justification is provided. This justification should address how the alignment, spacing, height, bulk, silhouette, massing and design quality of proposals will be combined to enhance the skyline.

# Skyline

4

## Key Principle UF22:

Where tall buildings are visible on the skyline they should enhance legibility by marking the presence of a significant, London-wide public function/destination.

- 4•66 The Empress State Building is visible on the skyline in a significant number of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. It therefore has the potential to work as a successful landmark, signifying the location of the redevelopment within the OA. In light of this, it may be appropriate to locate a new public destination at the base of the Empress State Building to give meaning to its height and presence on the skyline. This relates to the requirement set out in the Culture Strategy (Chapter 8) to create a new significant cultural destination.



Figures 4.16 to 4.18 (right): Examples of the current impact of the Empress State building on important views towards the OA

## Key Principle UF23:

All buildings that are significantly taller than their surroundings will be expected to address the following four design aspirations:

1. slenderness;
2. how the building meets the sky;
3. how the building meets the ground; and
4. articulation of the facade.

## Key Principle UF24:

In any proposal that retains the Empress State Building it should be integrated into an attractive composition of new tall buildings that form a cluster around it.

- 4•67 Tall buildings should be designed to appear slender and their massing should be proportionate to their height. Large slab blocks with continuous flat tops are discouraged. One way of achieving a slender appearance is to reduce the massing or floorplates of tall buildings as they rise. However, this is not always a guarantee of success.
- 4•68 The ways in which tall buildings meet the sky will be of particular importance when considering their impact on the skyline. A distinctive and well designed 'top' can help to give identity to a tall building and therefore avoid anonymity. However, when a tall building is part of a cluster, it is the grouping of the buildings and the way in which they read together, that will be the

# Skyline

primary source of local distinctiveness. Therefore, for a cluster of tall buildings, attention should be paid to the profile of the top of each building within the context of the whole cluster.

4•69 Clusters of tall buildings can be attractive as they can provide context for one another. If a number of tall buildings are proposed, a cluster is preferable to an approach that sees them scattered across the OA with no relation to one another. However, a cluster will only be visually attractive if the tall buildings are designed as a whole composition. Their location relative to one another is therefore as crucial to their potential success as the design of the individual buildings themselves. Whilst the lower levels of the individual taller buildings that form a cluster may be largely solid, it is important that their upper levels are variable, with plenty of sky visible between them. This will avoid a visual merging of the cluster into a 'solid wall' of several buildings each of similar form and height.

4•70 The three dimensional analysis undertaken as part of the Development Capacity Scenarios testing exercise revealed that the most appropriate location for additional tall buildings in the OA is within the vicinity of the Empress State Building. It also showed the potential for new buildings within the vicinity of the Empress State Building to enhance its visual impact on the skyline through variations in height, silhouette, profile and orientation.

4•71 The ways in which tall buildings meet the ground is also an important design consideration. If a tall building is treated as a 'stand alone' building it can present difficulties in achieving active frontages on all sides at ground level. This can be avoided by integrating tall buildings into a street, either with the lower storeys forming part of the street 'terrace' or with the lower levels forming a podium from which the tall element rises. Integrating tall buildings into a street gives the potential for the roof areas of the lower storeys to be used as roof terraces for the tall building's users. Given the emphasis in this SPD on the extension of the existing urban grain, this street based approach is likely to be the most successful for any redevelopment of the OA.

4•72 However, whichever approach is taken tall buildings must appear 'well rooted' and their design must mediate between the large scale of the building itself, and the human scale of the public realm to which it relates. Active ground floor uses are essential. Tall buildings can also impact on the microclimate at street level. Their location and design must successfully mitigate for these effects.

4•73 The visual impact of tall buildings cannot be assessed in terms of bulk and massing alone. They must also be of excellent architectural quality. The facades of tall buildings need to be particularly carefully articulated and animated. This can be achieved through the use of materials, colour, fenestration, reflectiveness and/

or the expression of depth. Blank walls must be avoided. The authorities must be satisfied that any outline planning application for the OA that includes tall buildings as important elements within a robust and credible masterplan also puts in place parameters and design principles that will result in excellent urban design and architecture. In order to ensure that the commitment to high quality can be realised through proactive control of reserved matters, the authorities will make these parameters and design principles a condition of any outline consent.

### Key Principle UF25:

Proposals for tall buildings should indicate how their impact on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunications interference will be mitigated.

4•74 All applications will be expected to include analysis of daylight, sunlight and the overshadowing of surrounding open spaces and should demonstrate that they do not have a detrimental effect.



# Edges

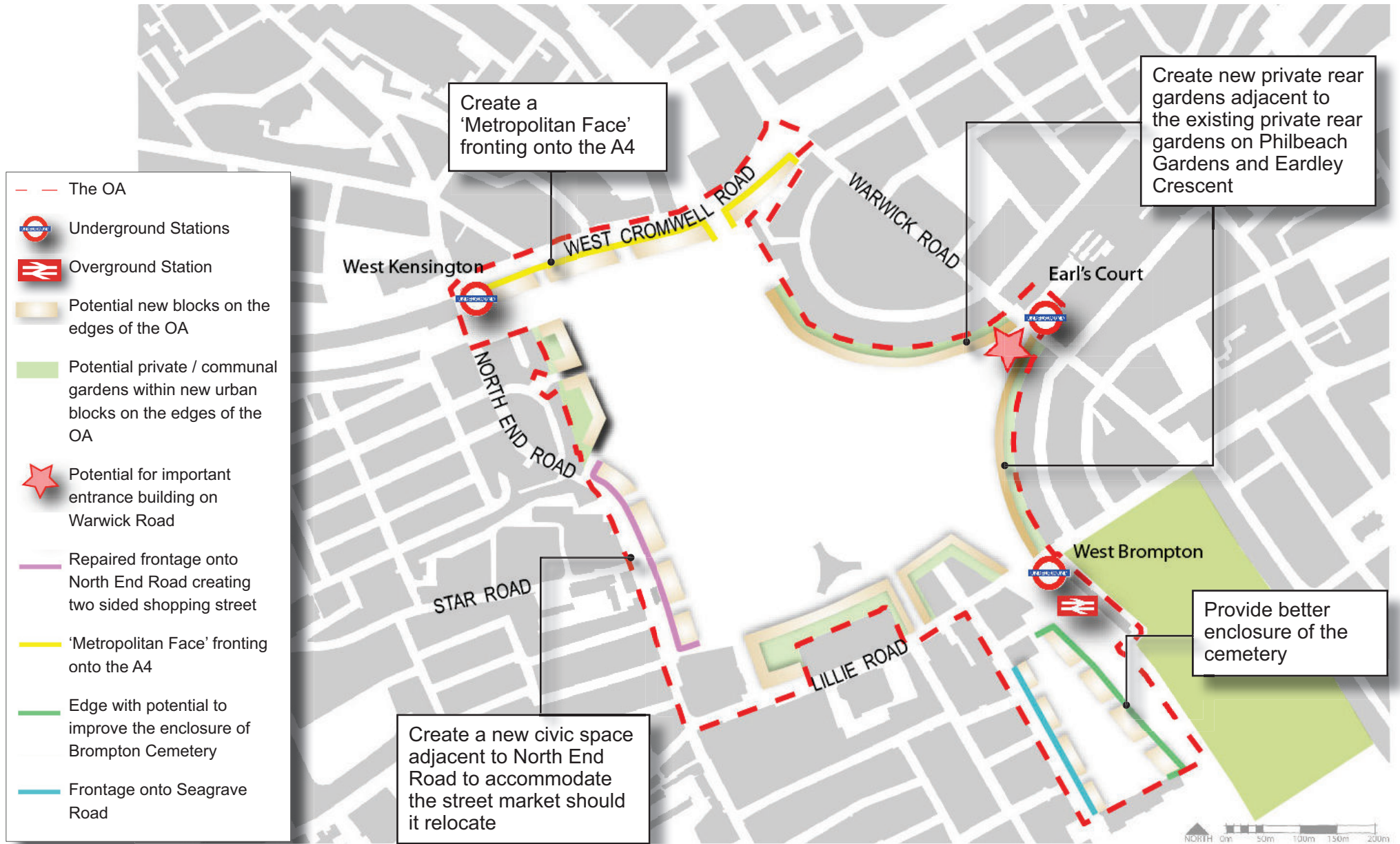


Figure 4.19: Illustrative diagram showing proposals for development on the edges of the OA

# Edges

## Key Objective

Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context.

- 4•75 Development around the edges of the OA will be expected to respond to a number of existing conditions including:
- the heights of adjacent buildings;
  - the existing terraces and mansion blocks that need to be brought into new urban blocks;
  - the widths of existing streets;
  - the existing private rear gardens;
  - the proximity to conservation areas; and
  - the proximity to listed buildings or heritage assets.

## Key Principle UF26:

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.

- 4•76 In the southern part of the OA, the edge conditions along Seagrave Road and the openness of views from the Brompton Cemetery are major influences on acceptable building heights and massing. Currently, this part of Seagrave Road largely comprises of 3 storey buildings rising slightly to a maximum of 5 storeys at the northern end. On the RBKC side of the railway line there is a 5.5 storey building.

- 4•77 There is a strong context to the west of the OA, to which development will be expected to respond. This is created by North End Road and the streets adjoining it. Building heights and typologies in these streets tend to be consistent. Many of these streets are also within conservation areas.

- 4•78 On the eastern edge of the OA the terraces of Philbeach Gardens and Eardley Crescent exhibit consistent scale and building typologies which are characteristic of much of the area further east. However, there are also a number of mansion blocks of a larger scale which front Warwick Road. The majority of the buildings to the east of the OA are included within conservation areas.



Figure 4.20: The existing built edge fronting onto the Seagrave Road car park



Figure 4.21: The existing edge conditions along North End Road

## Edges

4

4•79 Given the strongly defined character that exists to both the western and eastern edges of the OA, any proposed buildings in these locations should not rise significantly higher than the prevailing adjoining heights. Furthermore, in order to help the proposed buildings successfully integrate into their surroundings, they should also reflect the characteristics of nearby streets and buildings.

4•80 In the north of the OA, development will be expected to create a 'Metropolitan Face' which responds to the strategic importance of the A4 as a route into and out of Central London. The built form of the Metropolitan Face should create a strong edge to the A4. This may require some relatively tall elements, including potential 'gateway' landmark building(s) at the main entrance to the OA. However, the elevation onto the A4 should not become an oppressive 'mono-facade'. Instead, it must preserve or enhance the setting of the Baron's Court Conservation Area and respond to local topography and character. Gaps between buildings and profiled facades should be used in order to avoid the creation of a wall of monolithic development.

### Key Principle UF27:

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.

4•81 The treatment of the Empress State Building and any new buildings within its vicinity will be particularly important in terms of their impact on the setting of the terrace of listed houses on Lillie Road. The height and massing of any proposed buildings in this area must take account of the impact they will have on near views as well as their relationship with the attractive composition required in Key Principle UF24.

4•82 Existing building lines create a setting for the public realm, particularly for listed buildings and conservation areas and should therefore be respected. This is particularly important for the terrace of listed buildings on Lillie Road, which could be harmed by new buildings that do not follow the same building line.



Figure 4.22: The scale and building typologies of Philbeach Gardens



Figure 4.23: The edge that the OA presents to the important metropolitan corridor of the A4

## Edges

### Key Principle UF28:

The privacy, daylight and sunlight of all existing and future buildings must be respected.

### Key Principle UF29:

Sensitively incorporate the existing properties that remain on the edges of the OA into new urban blocks.

### Key Principle UF30:

Development within the OA should not prejudice future development of other sites outside its boundary.

4•83 LBHF's UDP Standard S13 (as amended in 2007 and 2011), Protection of Existing Residential Amenities, addresses potential loss of outlook, loss of privacy, noise and disturbance from roof terraces and balconies and aspect. Any application for regeneration within the OA must demonstrate that full regard has been paid to these standards.

4•84 RBKC's Core Strategy (2010) also identifies the importance of residential amenity and Policy CL5 requires all new buildings to ensure that *"the conditions of existing adjoining buildings and amenity spaces are not significantly reduced"*. It also requires *"reasonable visual privacy for occupants of nearby buildings"* and *"that there is no harmful increase in the sense of enclosure to existing buildings"*.

4•85 Existing properties on the edges of the OA and their relationship with any new development should be treated sensitively. Where the back gardens of existing buildings occur on the boundary of the OA, they should be incorporated into new urban blocks. Any proposals for the OA should demonstrate due regard for the access requirements and boundary locations of existing private rear gardens. Either new 'back-to-back' private gardens or semi private communal gardens, which are only accessed by the residents of the new adjoining properties, should be introduced between the new buildings and the existing rear gardens.

NEW PUBLIC  
REALM

NEW PRIVATE  
REAR  
GARDENS OR  
COMMUNAL  
GARDEN

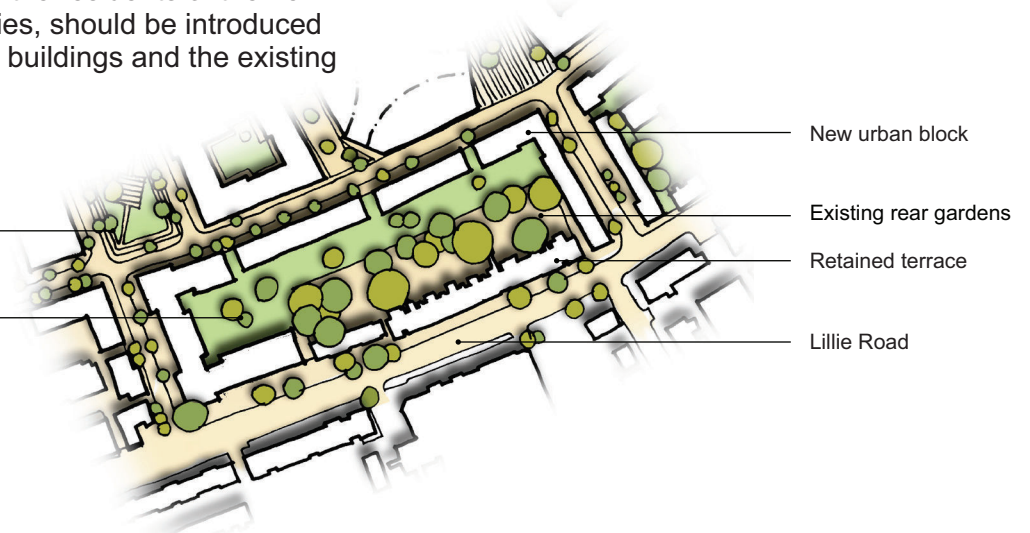


Figure 4.24: Illustrative approach to sensitively incorporating the Lillie Road terrace (made up of listed buildings and buildings of merit) into a new urban block

## Streets

4

### Key Objective

Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

4•86 There are a number of different streets in the OA's surroundings. Although there are differences between them, which make different neighbourhoods identifiable, there are also a number of similarities. In order to integrate the OA into its surrounding context successfully, the design of new streets should also adopt these common features.

### Key Principle UF31:

The widths of the streets should be proportional to the heights of the buildings that frame them. In general, no street should have an 'enclosure ratio' narrower than 1:1. In other words, no buildings should be taller than the width of the street onto which they front.

4•87 In order to design a successful street, it is important that the heights of buildings are proportional to the width of the streets onto which they front. This relationship is known as the 'enclosure ratio', which is usually expressed as:

'building height : street width'.

4•88 Successful enclosure depends upon the type of street being designed. For example, some Secondary Streets should have

generous proportions whilst, in general, all Tertiary Streets should feel more intimate. The following enclosure ratios were found in the OA's surroundings:

- Primary Streets have the most generous proportions, tending to range between 1:1.25 and 1.5.4 (the street is wider than the buildings are tall);
  - Secondary Streets tend to range between 1:1.2 and 1:3.2 (the street is slightly wider than the buildings are tall); and
  - Tertiary Streets have the most intimate proportions, tending to range between 1:0.8 and 1:1.9 (the street width and buildings heights are roughly the same).
- 4•89 As a general rule across the OA, it is considered that any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area and would risk feeling oppressive or 'canyon-like' and/or having restricted daylight/sunlight. Therefore, any street that breaks this rule will require significant urban design justification.
- 4•90 In order to achieve appropriate enclosure ratios, 'shoulder heights' may be used. The shoulder height of a building is the line above which the top storeys are set back, thus reducing their visible impact at street level. A general limit of one storey above shoulder height will be expected across the OA. Any further storeys above shoulder height will need to be justified in relation to street proportions and design. Plant should be included within the overall design of buildings and not simply added to rooftops.

### Key Principle UF32:

The heights of buildings and the widths of streets will be expected to vary according to street type.

- 4•91 In the OA's surroundings, the Character Area Analysis showed that street widths (building front to building front) tend to fall into the following broad range:
- Primary Streets: from 16m to 60m (the majority fall between 16m and 27m);
  - Secondary Streets: from 15m to 24m; and
  - Tertiary Streets: from 6m to 18m (the majority fall between 6m and 9m).
- 4•92 As the cross sections in Figures 4.25 to 4.27 demonstrate, achieving enclosure ratios no narrower than 1:1 need not result in monotonous streets if the heights of the buildings and the widths of the streets vary in response to street type. Streets that are likely to accommodate high levels of movement and activity should be wide, with higher buildings, whilst local streets should be narrower with lower buildings.
- 4•93 Buildings along a whole street, or on either side of the street, do not have to have exactly a same height. A level of variation is possible within the general 1:1 proportion.

# Streets

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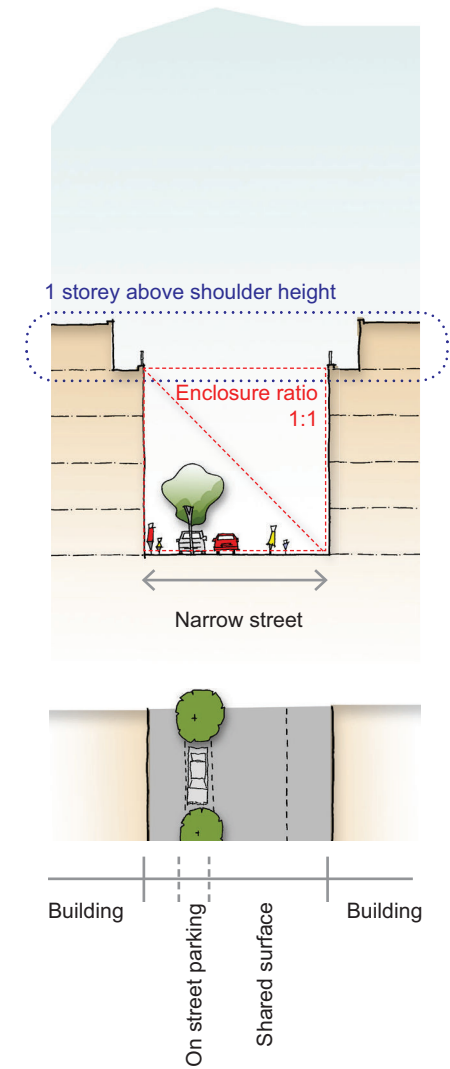
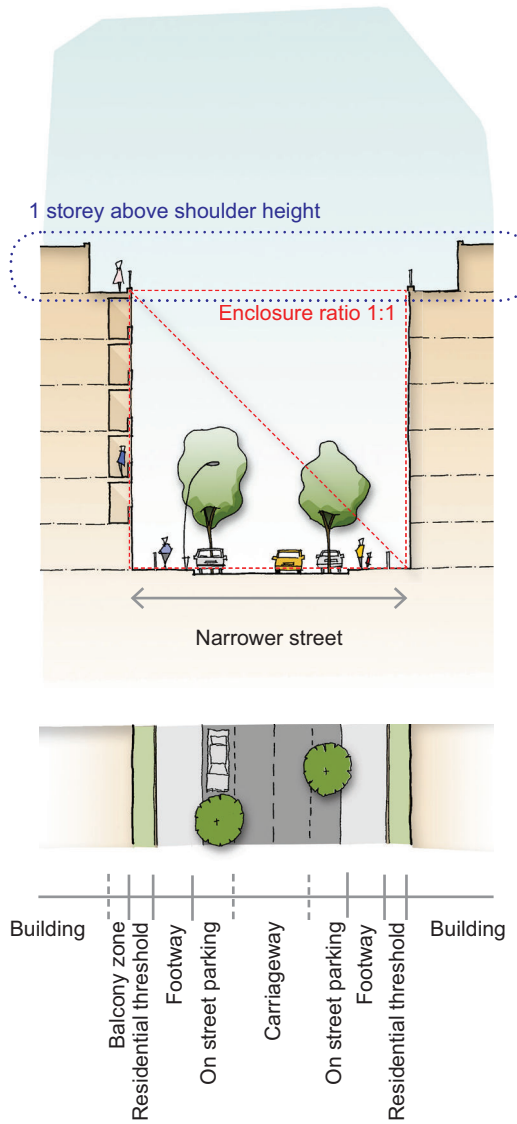
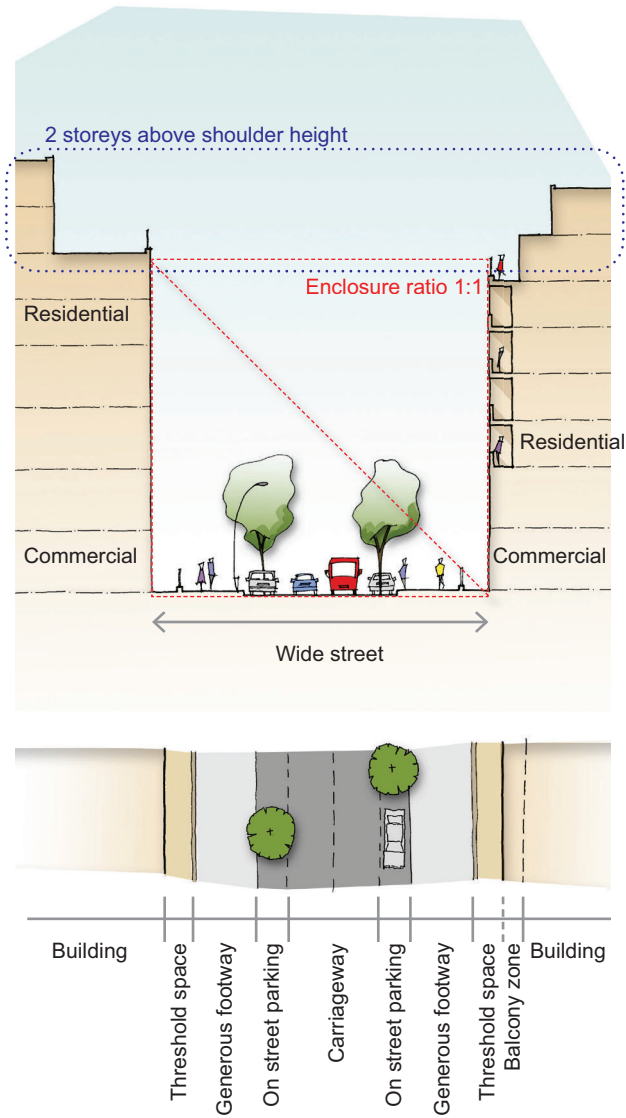


Figure 4.25: An illustration of a wide street with a mix of uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

Figure 4.26: An illustration of a medium width street with only residential uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

Figure 4.27: An illustration of a narrow street with only residential uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

## Streets

4

- 4•94 The importance of appropriate enclosure ratios is applicable to open spaces as well as streets. As outlined in the Character Area Analysis, the existing garden squares in the OA's surroundings tend to be framed by residential buildings that are broadly between 15m and 26m in height (from street level). Using 21st Century floor to ceiling heights, this equates to roughly 5 to 8.5 residential storeys.
- 4•95 The open spaces themselves tend to be between 35m and 65m wide and 50m and 115m long. Their enclosure ratios are generally between 1:3 and 1:7. Figures 4.28 and 4.29 show examples of the enclosure ratios found in local garden squares. For more examples and further analysis, please refer to the Character Area Analysis.
- 4•96 All open spaces proposed for the OA, not just the garden squares, but also those that make up the offer of a 2ha local park, will be expected to meet similar enclosure ratios. They will also be expected have similar dimensions and any buildings fronting onto them will be expected to be similar in height to those identified in the Character Area Analysis. Any open spaces that differ significantly from those found in the surrounding area in terms of spatial dimensions, the heights of surrounding buildings and/or enclosure ratios will require significant urban design justification.

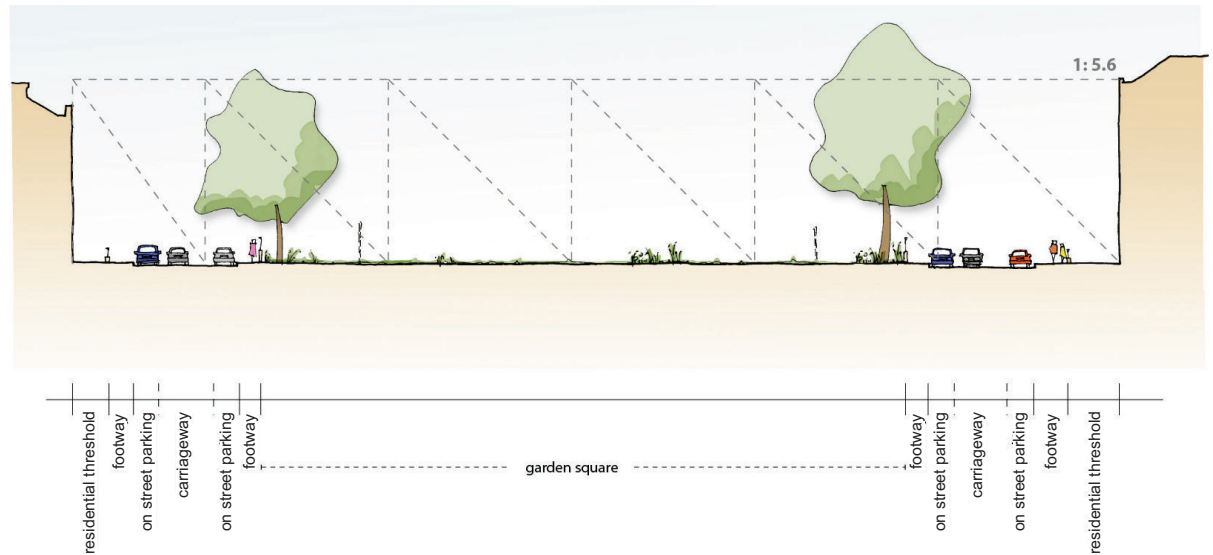


Figure 4.28: Queens Club Gardens enclosure ratio. For more local examples, please refer to the Character Area Analysis

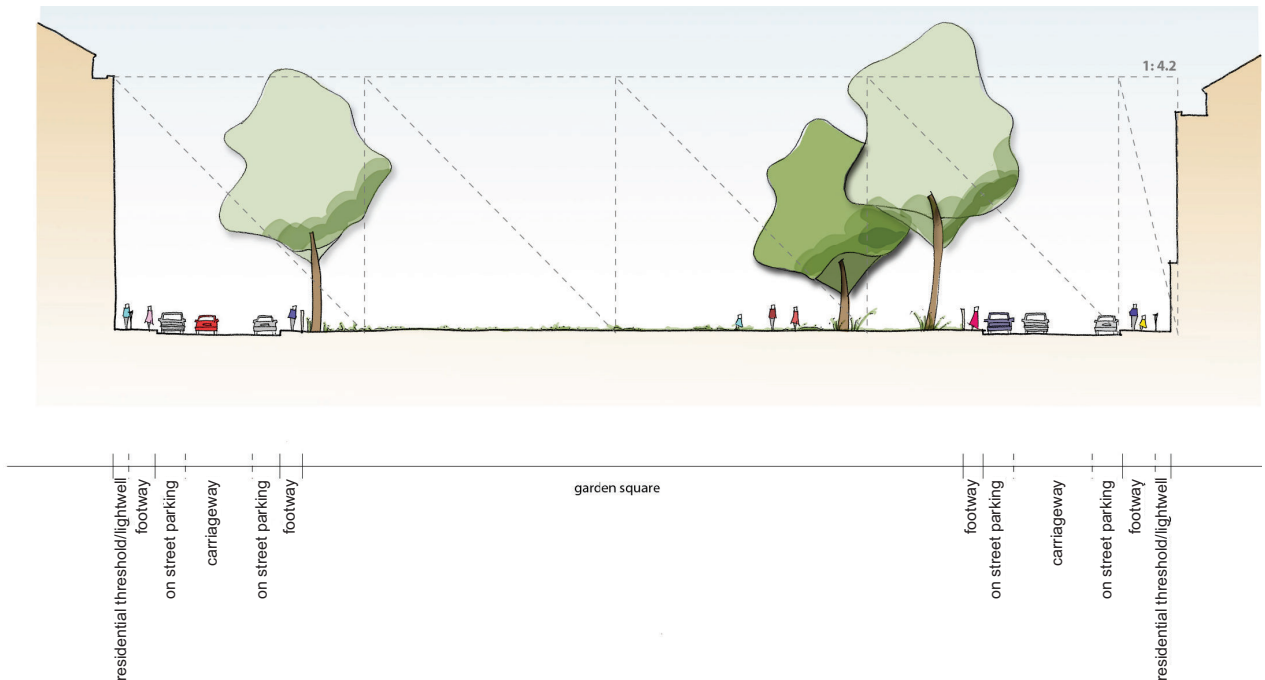


Figure 4.29: Redcliffe Square enclosure ratio. For more local examples, please refer to the Character Area Analysis

## Streets

### Key Principle UF33:

The buildings that frame the streets and open spaces within the OA should create strong, consistent building lines with boundary treatments that are appropriate to the use found within them.

- 4•97 The streets in the OA's surroundings tend to have strong and consistent building lines. They should be replicated within the OA.
- 4•98 For residential buildings, strong building lines should be created on the back edge of footways by formal boundary treatments surrounding small front gardens or 'residential threshold spaces' (see Figure 4.30). This would ensure that residential buildings have sufficient privacy.
- 4•99 Non residential buildings, including shops and offices, should also have strong building lines but need not have threshold spaces. Instead, the building lines could be created by the frontages of the buildings themselves. This would give the shops and businesses a strong street presence and would create the opportunity for appropriate non- residential uses to spill directly into the public realm, provided they do not obstruct pedestrian movement.
- 4•100 Building lines may vary to a degree between terraces or between urban blocks. Any proposals that include variations other than this will be expected to include a full urban design justification.



Figure 4.30: Consistent building line created by residential threshold spaces



Figure 4.31: Consistent building line created by building frontages

### Key Principle UF34:

Arbitrary variations in roofscapes should be avoided. Instead, roof lines should be strong and should demonstrate regular rhythms.

### Key Principle UF35:

Building blocks that are both long and high are not appropriate. Bulk and scale should be broken down by the grid of streets and other articulation.

- 4•101 The roofscape of an urban environment is the pattern created by the articulation of the rooftops. The Character Area Analysis identified that the roofscapes of the Victorian and Edwardian building typologies surrounding the OA are generally consistent. In some cases this means that they are simple, with very little visible articulation above the parapet lines (see Figure 4.32), in other cases they are punctuated by a regular rhythm of architectural details like dormer windows (see Figure 4.33 overleaf). These sorts of patterns should be replicated and reinterpreted within the OA.



Figure 4.32: Simple roofscape with a strong parapet



## Streets

4



Figure 4.33: Consistent roofscape with regular rhythm of dormer windows

- 4•102 Variation in mid terrace should be part of an overall composition and should not be arbitrary. Variations could occur between urban blocks or across streets. Roofscape across the OA should not be monotonous. Instead, they should vary according to land use or street type.
- 4•103 Where other occasional, subtle variations do occur they should signify important public functions or punctuate important parts of the urban grain like key nodes and corners.
- 4•104 Consistency in roofscapes should be applied to shoulder heights as well as rooftops. Wherever possible, plant should be integrated into the design of the main building rather than located conspicuously on rooftops.
- 4•105 Wherever appropriate, any accessible roof spaces should be used as terraces or roof gardens that contribute to amenity space and ecology. Any appropriate roof spaces that are not accessible should be treated as green or brown roofs.

### Key Principle UF36:

All proposals for regeneration within the OA will be expected to demonstrate a comprehensive, holistic approach to street design that treats streets as places where people will want to spend their time and that encourages cyclists and pedestrians.

- 4•106 Any application for the OA will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, 'An Inclusive Environment'.
- 4•107 All reserved matters applications will be expected to include a streetscape strategy.
- 4•108 Streets should not just be routes for movement, but should also be places where people want to dwell. As a result, good, unified street design that avoids all unnecessary street clutter is crucial.
- 4•109 The design of some streets should include regular rhythms of street trees. Street trees play an important role in the perception of a pleasant pedestrian experience. They contribute to street enclosure, reduce the visual impact of taller buildings and parked cars, provide shade and shelter and demarcate the footway. Street trees could also help to integrate the new neighbourhood into its existing context. All tree species selected for the new streets within the OA should be demonstrably similar to those found in the existing context.
- 4•110 All street trees will be expected to allow sufficient headroom for pedestrians and cyclists, avoid 'cluttering' the unobstructed pedestrian zone and ensure that visibility for street users is not compromised.
- 4•111 In order to encourage walking:
- ensure that all footways include an unobstructed zone reserved for pedestrian movement;
  - avoid extensive pedestrianisation as the activity generated by other road users contributes to the enjoyment and safety of pedestrians; and
  - ensure that no footway is has a gradient steeper than a 1:20 or 1:12 over short distances in extreme circumstances (as set out in 'Inclusive Mobility' (2005)).
- 4•112 In order to create cycle friendly streets that encourage cycling:
- ensure that there is direct cycle access to a suitable location near the entrance of all buildings, via clear and legible routes;
  - sign routes to the most important locations;
  - provide ample cycle parking that is convenient, easily accessible, covered, secure and attractive;
  - incorporate safe cycle priority at busy traffic junctions; and
  - use attractive, modern design solutions in order to raise the profile of cycling as a mode of transport.

## Streets

### Key Principle UF37:

Streets should be designed to keep vehicle speeds under 20mph.

4•113 Instead of introducing visually intrusive traffic calming measures, such as speed humps or chicanes that do not reflect the character of the surrounding streets, new streets should be designed from the outset to control vehicle speeds. Design features that naturally reduce vehicle speeds include:

- narrow carriageway widths;
- on-street parking;
- accommodating cyclists in the carriageway rather than in dedicated cycle lanes; and
- introducing changes in surface materials.

### Key Principle UF38:

Ensure that all streets and public open spaces are addressed by the public fronts of buildings.

4•114 Buildings in the OA will be expected to have clearly identified backs and fronts. The backs should be private (for example private rear gardens or servicing areas) and the fronts should be public (for example front doors or shop windows). Urban blocks in the OA should be arranged so that all of the backs are in the centre of the block, facing and protecting

each other and all of the fronts should address the public realm. This will ensure that the public realm is well overlooked and animated, whilst offering sufficient privacy for garden spaces or hiding unsightly activities.

### Key Principle UF39:

Ensure that all streets and public open spaces are overlooked by the 'active frontages' of buildings, comprising frequent windows and entrances.

4•115 'Active frontages' are defined here as those which contain frequent windows and entrances. Ensuring that public spaces are overlooked by active frontages provides 'natural surveillance' and therefore reduces both the incidence and fear of crime. As shown in Figure 4.34 one efficient way to achieve this principle is to ensure that all ground floor residential units have their own front door onto the street. However, this approach would not be suitable for mansion blocks as this typology should feature grand communal entrances. Where communal entrances are used, they must be accompanied by a high frequency of large windows overlooking the street.

4•116 Ground floors may be taller in proportion than the upper floors in order to create well proportioned elevations and allow long term flexibility.



Figure 4.34: A development at Mastmaker Road with individual front doors for every ground floor flat.



Figure 4.35: Mansion blocks at Queens Club Gardens with communal entrances and large, frequent windows overlooking the street.

## Illustrative Development Parcels

4•117 Comprehensive redevelopment of the OA will need to be approached in phases. Each phase must contribute towards the appropriate Key Objectives and Key Principles from this SPD in order to ensure that the new and growing population can access the appropriate services

and infrastructure. The following illustrations show how the Key Objectives and Key Principles could be delivered in different development parcels, and ultimately for the OA as a whole. They should not however, be treated as an illustration of phasing and no application will be assessed against them.

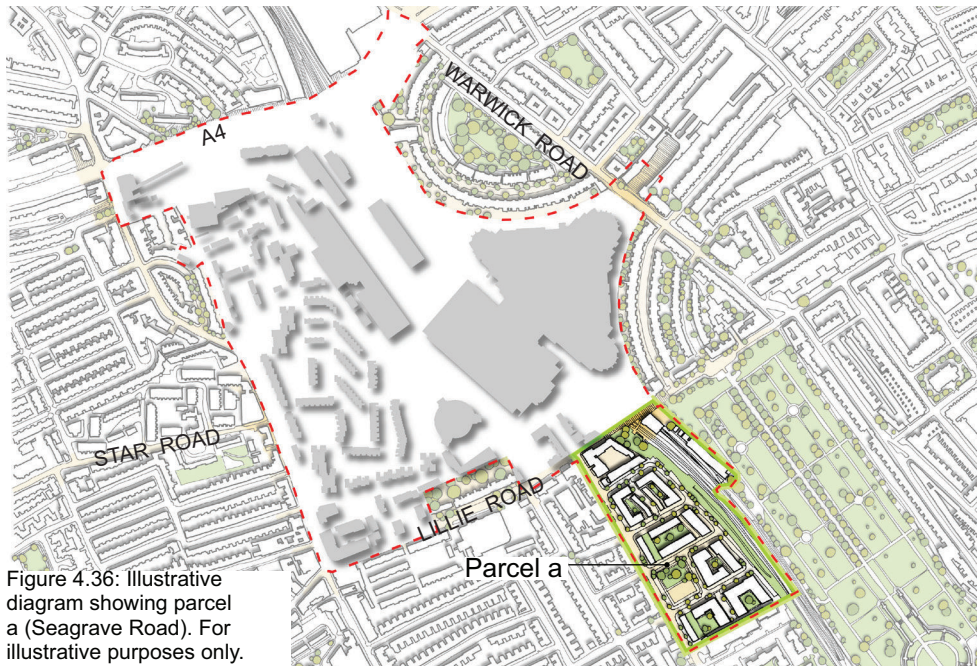


Figure 4.36: Illustrative diagram showing parcel a (Seagrave Road). For illustrative purposes only.

### 4•118 Development Parcel a (Seagrave Road):

- Parcel a has the potential to extend Merrington Road, Hildyard Road and Halford Road into the OA thus extending urban grain in an east-west grid of streets.

- Parcel a must deliver a publicly accessible green open space (possibly in the form of a garden square) within 100m walk of the majority of the residential units and, as set out in Key Principle UF17, proportionate to the needs of the new living and working populations.

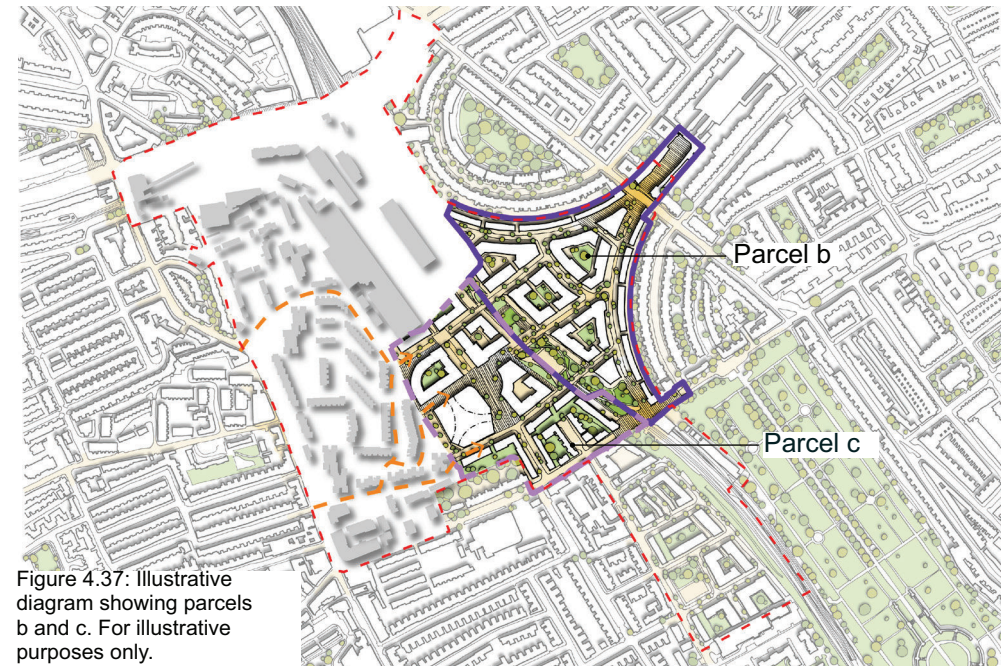


Figure 4.37: Illustrative diagram showing parcels b and c. For illustrative purposes only.

### 4•119 Development Parcels b and c:

- The design of both parcels b and c must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Both parcels b and c have the potential to deliver new north-south connections into the OA from Lillie Road.
- Parcel b has the opportunity to replicate the crescent street form found in the neighbouring areas.
- Parcel c must deliver east west connectivity across the entire OA from North End Road to Warwick Road during an early phase of development.

This may involve creating a connection through the housing estates if they haven't been redeveloped. Contingency plans will be expected to ensure this east-west connectivity is deliverable if comprehensive redevelopment of the OA does not happen.

- As set out in Key Principle UF17, parcels b and c should have proportionate publicly accessible green open space (possibly in the form of a linear park) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.

# Illustrative Development Parcels

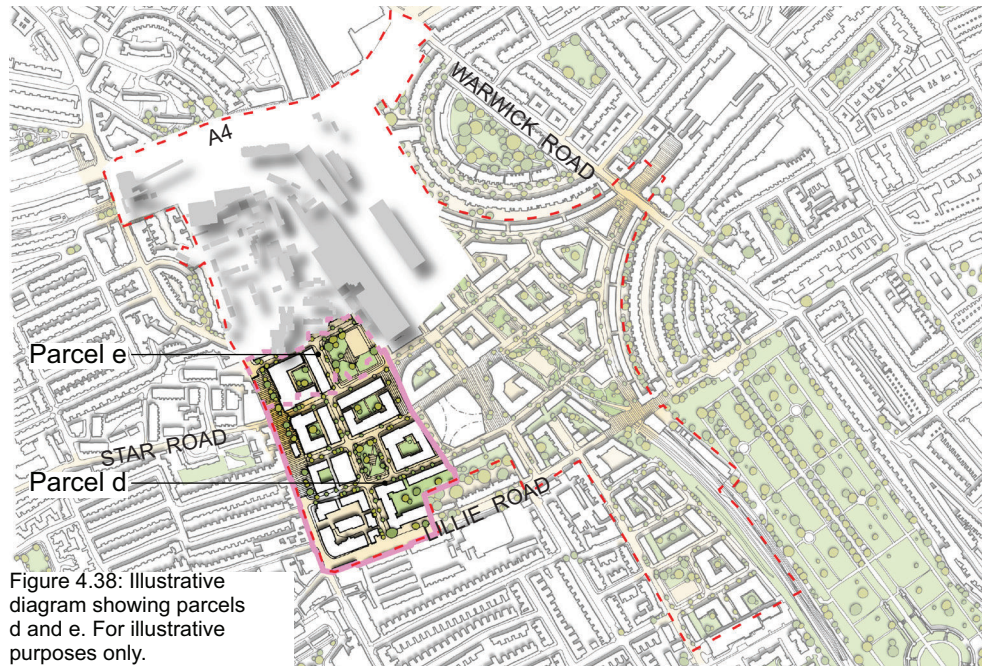


Figure 4.38: Illustrative diagram showing parcels d and e. For illustrative purposes only.

#### 4•120 Development Parcels d and e:

- Parcel d must deliver an east-west connection from Star Road into the OA. As outlined under Key Principle UF4, this is considered to be a particularly significant link and its delivery will be expected as early as possible.
- The design of both parcels d and e must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Parcel d should introduce a north-south connection from Lillie Road.

- Parcel d has the potential to extend Archel Road and Chesson Road into the OA, thus extending urban grain in an east-west grid of streets.
- As set out in Key Principle UF17, parcels d and e should have proportionate publicly accessible green open space (possibly in the form of garden squares) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.

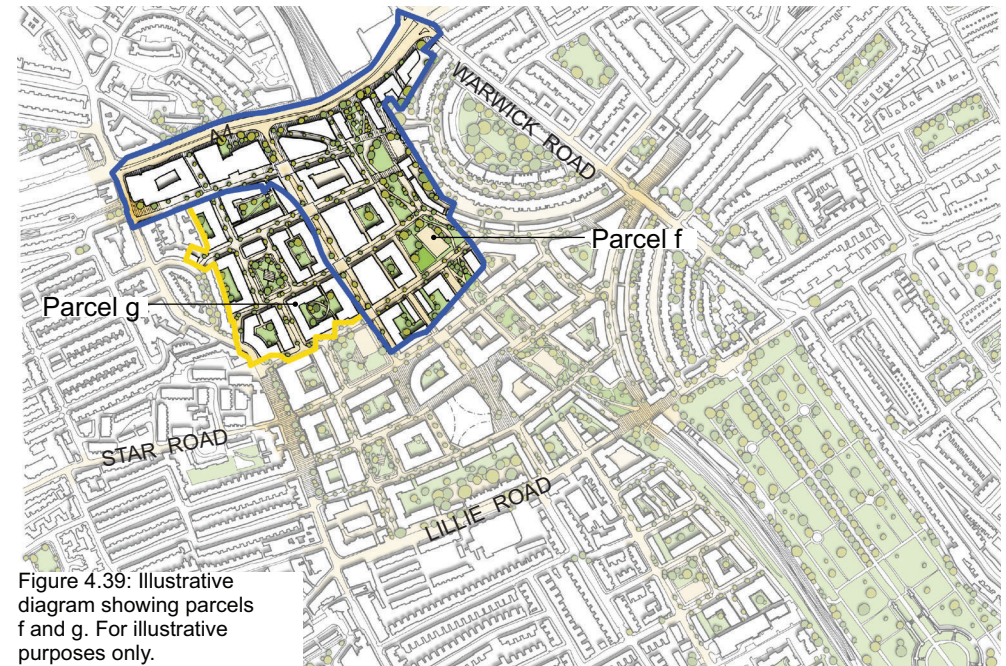


Figure 4.39: Illustrative diagram showing parcels f and g. For illustrative purposes only.

#### 4•121 Development Parcels g and h:

- The design of parcels f, g and h must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Parcel f should deliver a vehicular connection to the A4. Construction access from the A4 into the OA is likely to be required during the earliest phases of development.
- Parcel g should deliver a number of pedestrian and cycle connections from the A4 into the OA.

- Parcel g has the potential to extend Baron's Court Road into the OA thus extending urban grain in an east-west grid of streets.
- Parcel h has the potential to extend Beaumont Crescent into the OA.
- As set out in Key Principle UF17, parcels f, g and h should have proportionate publicly accessible green open space (possibly in the form of a linear park or garden squares) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.



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Figure 4.40: Adelaide Wharf by Olli Hellmann  
([www.oli-hellmann.com](http://www.oli-hellmann.com))

# 05 HOUSING STRATEGY

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## Overview

5

### Key Objective

Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

- 5•1 This chapter sets out the housing requirements in relation to estate regeneration, affordable housing, housing mix, housing size, housing space, amenity space and accessible housing. Policy and guidance on housing density requirements in the area can be found in London Plan Policy 3.4 and the Mayor's draft Housing SPG 2011.

## Context

- 5•2 The area surrounding the OA is typically characterised by Victorian terraced housing and mansion blocks, which are generally owner occupied or privately rented. There are also some post-war housing estates located to the east and north of the OA and some modern purpose built residential premises to the north.
- 5•3 Within the OA, existing housing is primarily located within the West Kensington and Gibbs Green estates. Some of these properties are leasehold or freehold having been purchased under the 'right to buy' initiative. There is also some private residential accommodation located to the south of the OA on Empress Place, Lillie Road and Seagrave Road.



Figure 5.1: Photograph of terraced housing



Figure 5.2: Photograph of mansion blocks

## Policy Context

### 5•4 The Mayor's London Plan (2011):

- 'Optimising Housing Potential' (Policy 3.4);
- 'Quality and Design of Housing Developments' (Policy 3.5);
- 'Large Residential Developments' (Policy 3.7);
- 'Housing Choice' (Policy 3.8);
- 'Mixed and Balanced Communities' (Policy 3.9);
- 'Definition of Affordable Housing' (Policy 3.10);
- 'Affordable Housing Targets' (Policy 3.11);
- 'Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes' (Policy 3.12);
- 'Affordable Housing Thresholds' (Policy 3.13); and
- 'Existing Housing' (Policy 3.14).

### 5•5 LBHF's Core Strategy (2011):

- 'Strategic Policy FRA';
- 'Strategic Site and Housing Regeneration Area 1 – FRA';
- 'Affordability' (Policy H2);
- 'Housing Quality and Density' (Policy H3);
- 'Meeting Housing Needs' (Policy H4); and
- 'Student Accommodation' (Policy H6).

### 5•6 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' (Policy CA7);
- 'Strategic Objective for Diversity of Housing' (CO6);
- 'Housing Targets' (Policy CH1); and
- 'Housing Diversity' (Policy CH2).



Figure 5.3: Photograph of a new housing development at Empire Square, Southwark. Photograph by Ivor Samuels



## Estate Regeneration

5

### Key Principle HO1:

The authorities will require a comprehensive approach to the redevelopment of the OA and LBHF will expect comprehensive redevelopment to deliver estate regeneration.

- 5•7 In 2007, the Government commissioned a study into the 'Future of Social Housing' by Professor John Hills. Many of the findings from this study reflect a national position of residualised social housing with concentrations of deprivation and social problems. Unemployment within the West Kensington and Gibbs Green estates is twice the borough average. Long term unemployment is especially problematic with 40% claiming benefits for longer than 6 months. 12% of the working age population claims Incapacity Benefit compared to a borough average of 6%. Housing Benefits claimants are at around 44% compared to a borough average of 25%. Referrals to both Child and Adult social care are significantly higher than in the rest of the borough. Residents on the estates suffer from a higher standardised mortality rate than the borough average.
- 5•8 Like many residential estates built in the 1960s and 1970s, the estates also suffer from discontinuous internal roads and poor quality open space which is underused and poorly integrated within the surrounding area. The West Kensington Estate in particular, has large areas of underused communal land that is poorly laid out.

- This poor layout discourages pedestrian footfall which reduces natural surveillance, which may increase the occurrence and perception of crime.
- 5•9 Given the development aspirations of adjacent landowners, LBHF have been investigating the potential for the inclusion of the West Kensington and Gibbs Green estates within the wider development proposals. LBHF's Core Strategy (2011), Strategic Site and Housing Regeneration Area – FRA 1 states that *"Regeneration of the West Kensington, Gibbs Green and Registered Provider estates phased over up to 20 years will be considered as part of the comprehensive approach to the opportunity area"*. Annex 1 of the Mayor's London Plan identifies that the OA *"presents a significant opportunity for regeneration comprising estate renewal"* and that *"A comprehensive approach should be taken to planning the future of the exhibition complex, the Transport for London Lillie Bridge Road depot, the local authority housing estates and other sites in the vicinity"*.



Figure 5.4: Photograph of a street within the West Kensington Estate



Figure 5.5: Photograph of garages within the West Kensington Estate

## Estate Regeneration

- 5•10 With the future of the West Kensington and Gibbs Green estates in mind, LBHF is undertaking a review (known as the 'Estates Regeneration Economic Appraisal') of the economic benefits and disbenefits of the following four principle options:
- Minimum intervention;
  - Minimal intervention and in-fill development;
  - Comprehensive redevelopment as a standalone estate redevelopment; and
  - Comprehensive redevelopment as part of a wider Earl's Court masterplan development.
- 5•11 The initial conclusions are that estate redevelopment as part of a wider Earl's Court masterplan development delivers the optimum benefits. LBHF, as landowner and being responsible for the estates as housing authority, has accepted and endorsed the conclusions contained within the Estates Regeneration Economic Appraisal, subject to the outcome of further consultation with local residents and any required consents from the Secretary of State.
- 5•12 One of the supporting evidence documents that accompanies this SPD is a Development Capacity Scenarios study. Scenario 1 in this study looks at a development scenario that does not involve the West Kensington and Gibbs Green estates whereas Scenarios 2 and 3 look at comprehensive redevelopment including the estates. A critique of each

scenario is included in the study, which demonstrates that including the estates in comprehensive redevelopment has far greater benefits in terms of extending the urban grain, increasing public open space and improving connectivity.

- 5•13 The inclusion of the estates as part of a comprehensive phased redevelopment of the OA would provide opportunities for the reprovision of the existing estate housing as part of a wider mixed tenure development. This would foster the creation of more mixed communities, which is a key tenet of Planning Policy Statement 1 on Delivering Sustainable Development. The utilisation of these adjacent sites also provides better opportunities for getting an improved quality of social rented accommodation.
- 5•14 In consideration of the above, LBHF, as a planning authority, is of the opinion that any approach to comprehensive redevelopment of the OA should include the West Kensington and Gibbs Green housing estates. Planning obligations will be put in place to ensure the delivery of estate redevelopment as part of any comprehensive approach to development in the OA.

### Key Principle HO2:

Any planning application involving the redevelopment of the Gibbs Green and West Kensington housing estates will have to demonstrate that the proposals would not result in any net loss of affordable housing measured by floorspace and unit numbers.

- 5•15 The Mayor's London Plan (2011) Policy 3.14B states that the loss of housing, including affordable housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. LBHF will also require that there is no net loss in unit numbers, in order to provide comfort to residents who live in a property within the estates, that they will have the opportunity to remain within the OA.



Figure 5.6 Aerial photograph of the Seagrave Road carpark site

## Estate Regeneration

5

### Key Principle HO3:

Any planning application providing affordable units in order to facilitate the re-provision of housing for the residents of the West Kensington and Gibbs Green estate, should be accompanied by an assessment of need. This should demonstrate that any affordable housing being provided will be sufficient in terms of size and adaptation to cater for the needs of residents on the existing estates who have expressed a desire to remain in the area.

- 5•16 Direct 'like for like' re-provision of the social housing in the Gibbs Green and West Kensington estates would not address current issues of overcrowding and hidden households or necessarily meet the housing needs of existing tenants. LBHF will require any regeneration proposals to provide for the housing needs of the estates' existing tenants and to provide sufficient housing options for those existing leaseholders and freeholders who wish to stay to have the opportunity to purchase an equivalent property (in terms of bedroom numbers) to their existing property. The assessment of need must accompany any planning applications submitted to LBHF. Equality considerations would need to be considered as part of the assessment of need. Separately, any application proposing redevelopment of the estates or re-housing of residents would need to be accompanied by an Equalities Impact Assessment, which would assess the

impact of any proposals against 'protected characteristics' as defined in the Equality Act 2010.

### Key Principle HO4:

25% of all new housing on the Seagrave Road site should be social rented and include a mix suitable to facilitate the re-provision of housing for an identified proportion of residents of the West Kensington and Gibbs Green estates.

- 5•17 LBHF's Core Strategy (2011) Policy on the OA Strategic Site states that "*development proposals for Seagrave Road should provide for the opportunity to deliver approximately 25% of all housing as social rented housing, subject to estate regeneration coming forward, detailed analysis and viability*".
- 5•18 Seagrave Road is currently used as a car park for the Earl's Court Exhibition Centres and is considered suitable for an early phase for redevelopment. It is therefore imperative that a certain quantum of the affordable housing provided on the Seagrave Road site is of a mix that reflects the needs of an identified proportion of the residents of the West Kensington and Gibbs Green estates, having regard to the requirements of Key Principle HO3.
- 5•19 In addition to this, affordable housing will be required to top up to the 40% affordable housing target identified in LBHF's Core Strategy Policy H2, subject to viability.

### Key Principle HO5:

The Phasing Strategy required in Key Principle PS1 (see Phasing and Section 106 Strategy) should demonstrate that the phasing and re-housing for the redevelopment of the West Kensington and Gibbs Green estates minimises disruption to existing residents.

- 5•20 The Phasing strategy should seek to provide certainty and clarity of delivery on a phased basis. The strategy should enable the wider regeneration proposals to commence promptly and continue efficiently, with discreet sections of existing housing capable of being replaced and residents relocated with minimum disruption. As part of any estate regeneration programme, residents should only be expected to move once – from their existing property to a new one.



Figure 5.7: Housing within the West Kensington estate

## Tenure Mix

- 5•21 Policy 3.12A of the Mayor's London Plan (2011) states that *"the maximum reasonable amount of affordable housing should be sought"*, having regard to current and future affordable housing requirements, affordable housing targets, the need to encourage rather than restrain development, the need to provide mixed and balanced communities, the size and type of affordable housing needed in particular locations and the specific circumstances of individual sites.

### Key Principle HO6:

In LBHF, 40% of all new housing in the OA should be affordable, subject to viability. The priority will be the replacement of the existing social rented accommodation to meet the needs of the existing residents of the two housing estates. The remainder of the affordable housing should be intermediate or affordable rented.

- 5•22 LBHF's Core Strategy (2011) Policy H2 states that 40% of residential units on sites with the capacity for ten or more self contained dwellings should be affordable, with a preference for *"all additional affordable housing to be intermediate and affordable rented housing unless a small proportion of new social rented housing is necessary in order to enable proposals for the regeneration of council or housing association estates"*, as is the case in the OA.

### Key Principle HO7:

In RBKC, 50% of all gross external residential floorspace above 800sqm should be affordable and provided on site within RBKC, subject to viability. A minimum of 15% of the affordable housing provision should be intermediate, with the remainder being social rented housing.

- 5•23 RBKC's Core Strategy (2010) states at paragraph 10.3.12 *"Earl's Court must retain the diversity of housing tenure which it currently enjoys. Residential development in Earl's Court must deliver a mix of housing to reflect local and boroughwide need."* The delivery of affordable housing forms part of the Vision for Earl's Court at paragraph 10.2, supported by Policy CP10 and CA7(q). Policy CH2i requires *"developments to provide affordable housing at 50% by floor area on residential floorspace in excess of 800sqm gross external area"*. Where less than 50% is provided it must be demonstrated that this is the maximum reasonable amount of affordable housing through an agreed viability assessment. RBKC Core Strategy (2010) Policy CH2k requires *"affordable housing provision of affordable homes on site where more than 1,200m<sup>2</sup> of gross external residential floor space is proposed, unless exceptional circumstances exist"*. There is therefore an expectation that the affordable housing provision will be on-site within RBKC. RBKC Core Strategy (2010) Policy CH2q

also requires *"that affordable housing includes a minimum of 15% intermediate housing in the Earl's Court ward"*.

- 5•24 The Government has recently introduced a new affordable housing tenure, known as Affordable Rent. This tenure is different to social rented and intermediate housing. It is not captured in RBKC's Core Strategy (2010) as it was introduced following the adoption of the Core Strategy. RBKC has recently adopted an interim policy for calculating Affordable Rent contributions in RBKC. This interim policy is a material consideration in the determination of planning applications and is available from RBKC Housing Department.

### Key Principle HO8:

Intermediate housing should provide for a broad range of affordability and tenure types.

- 5•25 The authorities will expect intermediate products to be targeted at a range of affordabilities, having regard to the requirements of para 3.61 of the Mayor's London Plan (2011), Policy H2 of LBHF's Core Strategy (2011), Policy CO6, Policy CH2r and para 35.3.14 of RBKC's Core Strategy (2010). Any intermediate housing will be expected to cover a variety of intermediate products, including shared equity, key worker, discounted market sale/rent and shared ownership, with a particular focus on products that allow for ownership and access to the property ladder.

## Tenure Mix

5

### Key Principle HO9:

To ensure diversity of housing and the delivery of a balanced community, the affordable housing must be tenure blind in terms of the external appearance of the buildings, entrance arrangements and amenity. Any affordable housing should be distributed by building or by block throughout the OA.

- 5•26 The Mayor's London Plan (2011) Policy 3.5 states that "*Housing developments should be of the highest quality internally, externally and in relation to their context.*" Para 3.76 of the Mayor's London Plan (2011) and para 1.3.13 of the Mayor's draft Housing SPG (2011) state that schemes should be designed so that all affordable housing units have the same external appearance and entrance arrangements as the private housing.
- 5•27 Both LBHF's and RBKC's Core Strategies require affordable housing and market housing to be integrated in any development and to have the same external appearance (RBKC Policy CH2n and LBHF para 9.30). Furthermore, RBKC's Core Strategy (2010) Policy CH2 requires the affordable and market housing to have equivalent amenity in relation to factors including views, daylight, noise and proximity to open space, playspace, community facilities and shops.

### Key Principle HO10:

The authorities will require that any detailed or reserved matters applications for each phase of the development should include an Affordable Housing Plan, which must set out the affordability, location, tenure mix and unit size of any proposed affordable housing within the phase.

- 5•28 In order to deliver Key Principle HO9 and ensure that any redevelopment of the OA delivers mixed and diverse communities, the authorities will expect any detailed or reserved matters applicant to submit an Affordable Housing Plan. This would contain details on the affordability, tenure mix, unit size and spread of different housing tenures through each phase of development. The authorities will look to ensure that as much as possible, affordable tenures are integrated with market tenures, as per the requirements of HO9.

### Key Principle HO11:

The authorities will control the affordability of any affordable housing.

- 5•29 The authorities will consider mechanisms to ensure that the affordability of affordable housing costs are not compromised by excessively high service charges or maintenance rates. Housing should be designed to provide for ease of maintenance for low cost home ownership. Providing buildings or blocks of exclusively affordable homes, as outlined in Key Principle HO9, will help to minimise service charges for residents. Further it will assist with tenancy management and internal building management. This also allows for single decants and importantly enables communities to stay together. Applicants will be expected to provide information on the 'weekly cost to occupier' of the proposed affordable units, including realistic and affordable service charges. For intermediate housing, annual housing costs (including service charge) should be no greater than 40% of net household income.

# Housing Sizes

5•30 The Mayor’s London Plan (2011) Policy 3.8 states that “*Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments*”. LBHF’s Core Strategy (2011) Strategic Objective 2 and Policy H4 place particular emphasis on the need for family sized housing. RBKC’s Core Strategy (2010) Policy CH2a requires “*new residential developments to include a mix of types, tenures and sizes of homes to reflect the varying needs of the borough, taking into account the characteristics of the site and current evidence in relation to housing need*”. Paragraph 35.3.10 sets out indicative house sizes (see below) but acknowledges that it would be unrealistic to expect all housing schemes to comprise dwellings built to these exact ratios.

in more detail in the preceding section on estate regeneration.

5•32 RBKC has a significant shortage of larger social rented properties. Paragraph 35.3.10 of RBKC’s Core Strategy (2010) identifies an ideal mix of 45% 1 and 2 bed and 55% 3 and 4 bed. Development proposals should also consider the needs of extended families.

intermediate housing market. Paragraph 35.3.10 of RBKC’s Core Strategy (2010) identifies an ideal mix as 70% 1 and 2 bed, and 30% 3 and 4 bed. Intermediate products should be offered at the ‘usefully affordable’ point.

## Market Housing Sizes

### Key Principle HO14:

Development proposals within the OA will be expected to provide a range of market housing unit sizes, especially the provision of larger family sized units (3 bedrooms or more), having regard to the London Strategic Housing Market Assessment 2008 and both LBHF and RBKC Core Strategies.

## Intermediate Housing Sizes

### Key Principle HO13:

The intermediate housing mix must have regard to the local and strategic housing need assessments and the advice of the boroughs’ and GLA’s Housing Departments.

5•33 LBHF’s policy for intermediate housing mix is based on the Mayor’s Housing Strategy (2010) (Policy 1.1C) which states that “*...by 2011, 16% of intermediate homes should have three bedrooms or more*”. The split between one bed and two bed intermediate properties is not set within the Mayor’s Housing Strategy (2010), but LBHF will expect a significant proportion of the intermediate properties to be two bed, which reflects the needs and aspirations of people on the H&F Homebuy register.

5•35 The London Strategic Housing Market Assessment 2008 shows the market housing demand to be 39% 1 bed, 47% 2 bed and 14% 3 bed. Para 35.3.10 of RBKC’s Core Strategy (2010) shows the demand for market housing in RBKC over the next 20 years to be 20% 1 and 2 bed units and 80% 3 and 4 bed units. Therefore, on the basis of this evidence, both LBHF and RBKC would expect to see a mix of market unit sizes with a significant quantity of larger family sized units (3 bedrooms or more) and also consider the needs of extended families.

5•34 RBKC has a shortage of intermediate homes, but because of land values, the preference is for smaller properties, as larger homes become ‘unaffordable’ to the

## Social Rented Housing Sizes

### Key Principle HO12:

In LBHF, the social rented housing mix should mirror that identified in the Assessment of Need, produced in accordance with Key Principle HO3. In RBKC, the social rented housing mix should aim for a minimum of 55% 3 and 4 bed with the remainder being 1 and 2 bed.

5•31 In LBHF, the size of the units required to enable the regeneration of existing housing estate properties will be dependent on the assessment of need. This issue is covered

## Alternative Accommodation

5

### Key Principle HO15:

Any application for comprehensive development should provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students.

5•36 In addition to conventional residential accommodation, a variety of other accommodation offers should be provided through any redevelopment proposals, such as student accommodation and Extra Care Housing. This is supported by Policy CH2 of RBKC's Core Strategy (2010), which "*encourages extra care housing, particularly in the south of RBKC*" and by Policies H4 and H6 in LBHF's Core Strategy (2011), which support applications for housing for people who need care and support and applications for student housing in the OA respectively. Any older people's housing should be provided on the same basis of affordable to market housing as set out in Key Principles HO6 And HO7.

## Housing Space Standards

### Key Principle HO16:

All new housing should accord with the standards in the Mayor's London Plan (2011) and the Mayor's draft Housing SPG (2011).

5•37 The Mayor's London Plan (2011) includes minimum space among other design standards for all new housing (Policy 3.5). The Mayor's draft Housing SPG (2011) expounds Policy 3.5 of the Mayor's London Plan (2011) and reflects aspects of the Mayor's Housing Design Guide (2009). Para 35.3.13 of RBKC's Core Strategy (2010) states that the standards in the Mayor of London's Housing Design Guide "*will inform requirements within the Borough*".

5•38 Any development proposals within the OA will need to have regard to the Mayor's draft Housing SPG (2011) standards, including the minimum amount of internal floor area (GIA). Table 3.3 of the Mayor's London Plan (2011) is shown here in Table 5.1. In addition to this, wheelchair accessible dwellings in RBKC will need to meet the minimum floorspace requirements in the RBKC Access Design Guide, 2010.

	Dwelling Type (bedroom/ persons)	Essential GIA (sqm)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b4p	86
	3b6p	95
	4b5p	90
Two storey houses	4b6p	99
	2b4p	83
	3b4p	87
	3b5p	96
	4b5p	100
Three storey houses	4b6p	107
	3b5p	102
	4b5p	106
	4b6p	113

Table 5.1: Minimum internal floor areas as set out in Table 3.3 in the Mayor's London Plan (2011)

5•39 Whilst it is noted that these are minimum standards, there is an expectation that where they are exceeded, the vast majority of dwellings will not be greatly in excess of these standards. There is market demand for exceptionally large dwellings, particularly in Kensington. It is fair that some dwellings are provided for this market. However, the over-riding priority is to provide dwellings of a size that meet the expectations of the vast majority of Londoners, to contribute to addressing the chronic shortage of ordinary-sized housing across London.

## Amenity Space

### Key Principle HO17:

All new homes must be carefully designed and laid out to have satisfactory access to gardens or other outdoor amenity space. Family dwellings at ground or podium levels should have access to private gardens. Balconies may be provided where appropriate subject to design, location and context (e.g. overlooking shared private space).

- 5•40 The Mayor’s draft Housing SPG (2011) standard 4.10.1 sets out a requirement for a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm to be provided for each individual occupant.
- 5•41 The LBHF Unitary Development Plan (2007) requires residential accommodation at ground floor level to provide 36sqm amenity space for family units and 14sqm for non-family units. It is recognised that this standard may not be deliverable in higher density developments such as in this OA, although every effort should be made to achieve it. LBHF’s Core Strategy (2011) Policy H3 requires gardens and shared amenity space to be included within development proposals. RBKC’s Core Strategy (2010) Policy CH2 requires “housing schemes to include outdoor amenity space”.

## Accessible Housing

### Key Principle HO18:

A minimum of 10% of residential units in each borough must be wheelchair accessible.

### Key Principle HO19:

All residential units must be built to Lifetime Homes standards.

- 5•42 Both boroughs’ Core Strategies require 10% of residential units to be wheelchair accessible and all new build dwellings to be built to “Lifetime Homes” standards (Policy CH2 in RBKC’s Core Strategy (2010) and Policy H4 in LBHF’s Core Strategy (2011)).
- 5•43 Within the West Kensington and Gibbs Green housing estates there are a number of disabled residents who live in wheelchair accessible units. Some of these units have been adapted to provide for particular disability needs, but other units have not been adapted because the existing home is not practically capable of adaptation.
- 5•44 Where a continued need exists, or indeed, where there is a new need arising from the estate residents, the priority in terms of accessible housing in LBHF should be the provision of the appropriate amount of wheelchair and adapted units in order to cater for the needs of these existing estate residents.

- 5•45 Beyond catering for the needs of the estate residents, there should be further provision of wheelchair accessible units to top up the overall provision across the scheme so that in total, wheelchair accessible dwellings constructed total at least 10% of all new residential dwellings in each borough. This top-up provision should be spread evenly across tenures, and across all Extra Care units constructed in the OA.
- 5•46 Further advice on achieving Lifetime Homes standards is set out in LBHF’s Access For All SPD and RBKC’s Access Design Guide SPD.



Figure 5.8: Photograph of a new housing development at St. Andrews, Bromley by Bow. Photograph by A&M Photography





# 06 EMPLOYMENT STRATEGY

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## Overview

6

### Key Objective

Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

- 6•1 This Employment Strategy focuses on two aspects. First, it addresses the provision of a suitable quantity and variety of business floorspace, as this is likely to make the greatest contribution to the minimum new jobs target of 7,000. Second, it sets out the authorities' strategy for securing employment and training across all employment sectors.
- 6•2 For the purposes of this SPD, business uses are defined as all those land uses within Class B1 of the Use Classes Order 2010, which covers offices (B1a), research and development (B1b) and light industrial (B1c). In addition to the business sector, jobs will also be created in culture and retail which will 'count' towards the 7,000 jobs total, but are not addressed in this chapter.

## Context

- 6•3 The OA currently contains two significant office buildings. The Empress State Building is the largest and most prominent of these, providing over 40,000sqm (GEA) of floorspace and is currently occupied by the Metropolitan Police. It was originally developed as a hotel in 1961 but subsequently converted to office use and was refurbished and extended by three floors between 2001 and 2003. The second office building is Ashfield House on the northern boundary of the site, which provides 8,600sqm (GEA) of floorspace and is currently occupied by Transport for London. In addition to this, the OA currently accommodates a number of small and ancillary office spaces including Clear Channel advertising on West Cromwell Road, the TfL Lillie Bridge Road Depot, the Earl's Court Exhibition Centres, the Adel Rootstein Ltd light industrial premises on Beaumont Avenue and a number of small light industrial premises on Rickett Street and Roxby Place.

## Policy Context

- 6•4 **The Mayor's London Plan (2011):**
- 'Offices' (Policy 4.2); and
  - 'Improving Opportunities for All' (Policy 4.12).
- 6•5 **LBHF's Core Strategy (2011):**
- 'Planning for the Location of Employment Activities' (Strategic Policy B);
  - 'Strategic Site and Housing Regeneration Area – FRA 1'; and
  - 'Local Economy and Employment' (Policy LE1).
- 6•6 **RBKC's Core Strategy (2010):**
- 'Earl's Court' (Policy CP10 and associated Vision);
  - 'Location of Business Uses' (Policy CF5);
  - 'Earl's Court Exhibition Centre' (Policy CA7); and
  - 'Infrastructure Delivery and Planning Obligations' (Policy C1).

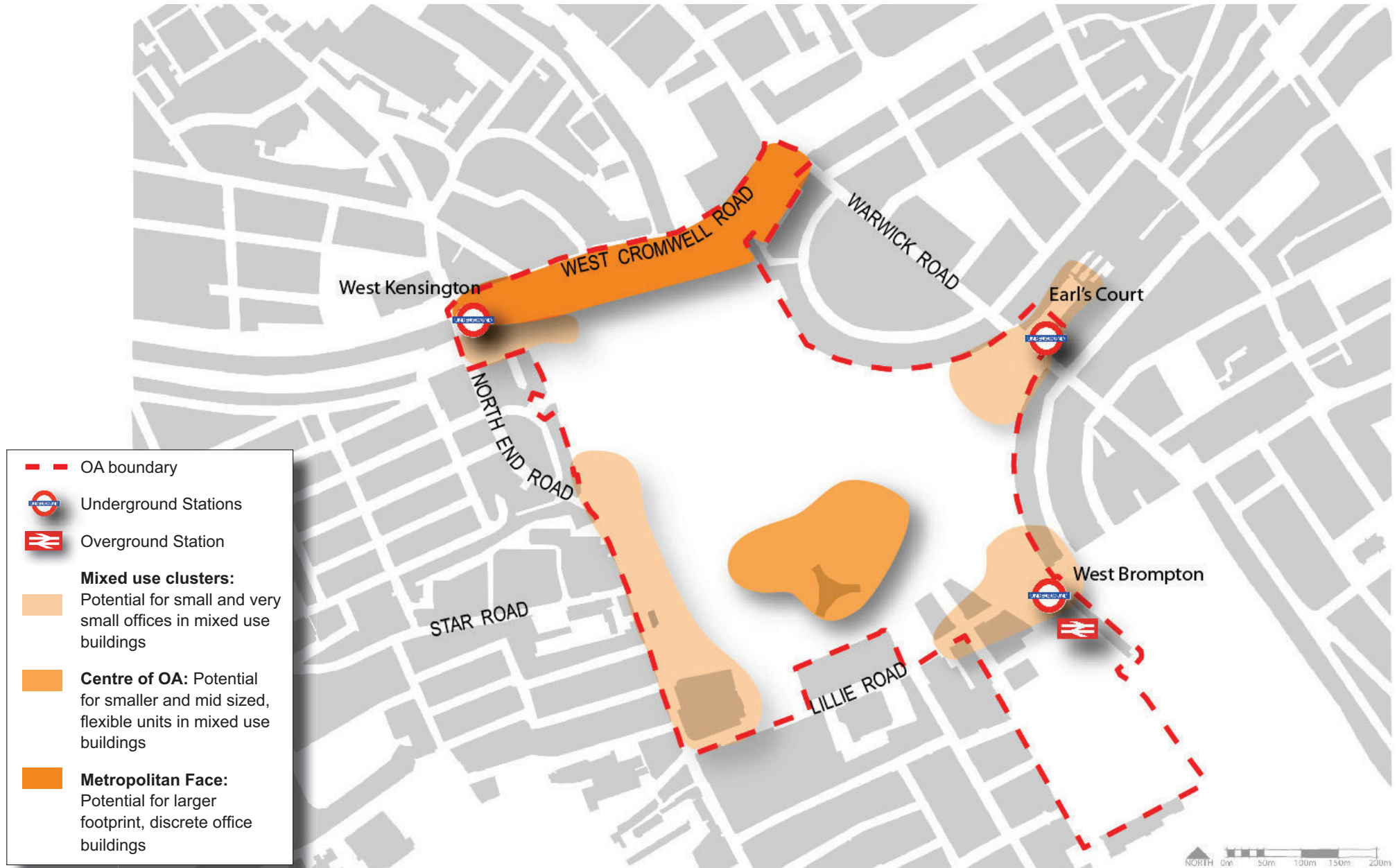


Figure 6.1: Illustrative diagram showing the potential distribution of businesses the OA

# Business Provision

## Existing Businesses

### Key Principle ES1:

Existing business floorspace in the OA should be renewed and modernised or replaced through development proposals to maintain and intensify existing employment provision. Applicants should establish the requirements of existing tenants through consultation and demonstrate how these have been taken into account in their proposals.

- 6•7 Office and light industrial based employment makes a significant contribution to employment provision in the OA. This existing employment base should be retained and expanded through modernisation or replacement of the existing stock. Applicants should consult existing office and light industrial tenants at an early stage to ensure that their requirements are taken into account in development proposals. This should include an assessment of the existing jobs provision and the quantum of business floorspace.

## Future Business Floorspace Provision

### Key Principle ES2:

Proposals in the OA should incorporate additional business floorspace totalling approximately 90,000sqm (GEA) across the OA, primarily to meet local demand in both boroughs.

- 6•8 The Opportunity Area Office Study (2011) was commissioned to determine the scope for business provision in the OA having regard to the policy context and the supply of and demand for office floorspace at the local and sub-regional level. It considered a range of business floorspace provision in conjunction with the initial development capacity scenarios developed for the OA (please see Development Capacity Scenarios supporting evidence paper).
- 6•9 The study identifies a shortfall in the supply of business floorspace at a local level and at the wider sub-regional level, particularly in the central London sub-region. Supply constraints, particularly within Westminster, could mean that demand will be displaced to elsewhere in the sub-region. It is expected that schemes coming forward in the OA will contribute towards meeting the identified shortfalls in supply of business floorspace particularly at the local level and achieving the indicative new employment capacity of in excess of 7,000 new jobs.
- 6•10 The study establishes that additional business floorspace provision totalling

approximately 90,000 sqm (GEA) across the OA will meet the local shortfall and some of the sub-regional shortfall without compromising other key principles in this document or LBHF's or RBKC's Core Strategies.

## Nature and Phasing

### Key Principle ES3:

New business floorspace should be phased so that up to half of the overall quantum is delivered in the early phases of redevelopment in the OA, with the remainder being provided in the later phases. Business floorspace in the early phases will need to incorporate provision for small and medium-sized enterprises. Applicants should have regard to the spatial distribution described below.

- 6•11 It is anticipated that sites in the OA will be developed on a phased basis over at least a twenty year period. The provision of the total amount of additional business floorspace envisaged in Key Principle ES2 too early in this period would risk undermining LBHF's Core Strategy Strategic Policy B. The Opportunity Area Office Study (2011) identified the importance of establishing the OA as a new neighbourhood before it would be attractive for business occupiers in terms of accessibility, amenity and the nature of business accommodation provided. This will take time to establish and is particularly important in terms of attracting larger office

## Business Provision

occupiers, who may be making a choice between a number of areas in London.

- 6•12 Therefore, business floorspace provision in the early phases of development will typically need to be flexible and smaller in scale in order to meet local need, particularly that of small and medium-sized enterprises. This should include small office buildings and business floorspace in mixed-use buildings. This type of provision can be readily integrated with residential, retail, leisure, cultural and community uses, which are anticipated to be the predominant uses in the early phases.
- 6•13 Business floorspace in the early phases should largely be focussed within the vicinity of the Empress State Building. Smaller concentrations of business floorspace might also be found near to transport hubs and on routes through the OA, where this does not conflict with residential uses. Spatial testing has identified that up to half of the business floorspace provision envisaged in Key Principle ES2 could be accommodated in these areas.
- 6•14 The remainder of the business floorspace will be delivered in the later phases and will typically comprise larger units and discrete office buildings. The authorities envisage that this type of accommodation will be focussed in the north of the OA fronting onto West Cromwell Road (A4). The Urban Form Strategy (Chapter 4) refers to this location as the 'Metropolitan Face' of the

OA. It has the potential to offer an attractive and high profile location for larger office occupiers provided that it is integrated into the new neighbourhood created in the OA and benefits from the associated amenities.

### Variety and Adaptability

#### Key Principle ES4:

Development proposals for business floorspace should incorporate variety in the type, size, cost and terms (lease arrangements) of accommodation and be designed to be readily adaptable for use by a range of tenants. Provision of business space suitable for very small, small and medium-sized enterprises and incubator units to meet borough level demand will be expected in the early phases. Later phases should accommodate a variety of sizes of units but could include larger office floorplates over 1,000 sqm.

#### Key Principle ES5:

The authorities will secure the provision of affordable business space for very small, small and medium sized enterprises and incubator units across all phases of development.

- 6•15 Business units will need to be designed to be readily adaptable for use by a range of tenants, including single occupier and

multi-let space at a variety of scales. The Opportunity Area Office Study (2011) identified that typical floor sizes in the order of 1,000 – 2,000sqm are most likely to be appropriate to meet demand arising at a sub-regional level, given the potential range of occupiers, although this may change over time. Provision for local demand will need to be smaller and more flexible, including a range of unit sizes typically below 1,000 sqm.

- 6•16 The early phases of development in both boroughs should provide for very small, small and medium-sized enterprises, including dedicated incubator units with shared central services. The authorities will secure affordable business space within this offer and will secure affordable space within mixed use and larger office proposals, which are likely to be more acceptable in later phases.

# Employment and Training

6

## Protecting Existing Employment

### Key Principle ES6:

Any applications proposing the redevelopment of the OA must, in consultation with the Economic Development Teams of both boroughs, include measures, during and post construction, to protect businesses outside of the OA affected by development.

- 6•17 The hinterland surrounding the OA represents a significant source of existing employment and economic activity. Many of these employers have grown to serve the needs of the Earl's Court Exhibition Centres. In the Earl's Court ward alone there are 117 businesses and a workforce of 1,725 employees providing accommodation and food service activities.
- 6•18 Both boroughs will require steps to be taken to mitigate against the impact development will have on existing local employers brought about by the loss of the Earl's Court Exhibition Centres and the period of construction. This should include sector specific support, improvements to neighbouring trading environments, training and retraining, contributions to commercial centres' management and business engagement and consultation. Proposals must include a strategy demonstrating how the requirements of LBHF and RBKC have been met.

## Local Procurement Opportunities

### Key Principle ES7:

Developers should put in place procedures to ensure small and medium sized local enterprises (local SMEs) have access to tender opportunities for the procurement of goods and services generated by the development both during and after construction, having regard to the councils' Local Procurement Code of Practice.

- 6•19 The authorities will require the developers to champion the benefits of using local businesses in the supply chain and ensuring that a greater proportion of expenditure is retained in the local economy. Local businesses are more likely to employ local labour and will therefore increase the sustainability of the development by reducing travel distances.
- 6•20 The Councils have produced a joint Local Procurement Code of Practice, which requires developers and their contractors to agree policies and procedures with the boroughs' Economic Development teams to ensure that local businesses have access to tender opportunities for the procurement of goods and services.
- 6•21 The Councils will regularly monitor the proportion of local procurement opportunities and will require any developer to submit information about contract tendering activity with local

businesses and its outcomes. Information should be submitted from the developer in respect of contract tendering activity and the outcomes with regard to local businesses.

- 6•22 A financial contribution will be sought toward the costs of facilitating local procurement, which could include the establishment of a local enterprise screening service, brokerage with contractors and owners, periodic 'Meet the Buyer' and business briefing events, the maintenance of a directory of suppliers, support for businesses to become tender ready and performance monitoring. The mechanism for determining the level of contribution is set out in the Local Procurement Code of Practice.



# Employment and Training

## Variety and Adaptability

### Key Principle ES8:

Applications for comprehensive redevelopment will be expected to deliver and any other applications will be expected to contribute towards:

- support and funding of Workplace Coordinators working within the developer’s project team to ensure that local people benefit from employment opportunities throughout the development;
- the provision of a recruitment & employability Construction Training Centre before and during construction; and
- the provision of a post construction standalone Recruitment and Job Shop in a focal point of the development.

6•23 Financial contributions will be sought from developers to fund Workplace Coordinators, in line with the principles of the councils’ joint Employment and Training Code. The postholders will work closely with and be located within the developer’s project team. The Coordinators will work to meet the identified employment needs of key partners, contractors and suppliers and coordinate links with external agencies to provide suitable candidates. The Councils consider this role to be critical in steering job opportunities towards local people and demonstrable practical gains should result from this initiative (i.e. in numbers of residents getting employment in the

development). In addition the Councils see increasing employment opportunities for local people with disabilities, vulnerable groups, young offenders and those furthest from the labour market as equally important and the Workplace Coordinators will play a key role in delivering this.

6•24 Developers will be expected to provide a recruitment and employability Construction Training Centre in the OA before and during construction and a standalone Recruitment and Job Shop post construction, within a focal point of the development. The Recruitment and Job Shop should serve as a highly visible focal point for residents looking to undertake vocational skills training relevant to local job vacancies and obtain work experience and apprenticeship opportunities, as well as to assist employers in recruitment.

### Local Employment Opportunities

#### Key Principle ES9:

Any applicant seeking permission for comprehensive redevelopment should agree to provide a Local Labour, Skills and Employment Strategy and a Local Labour, Skills and Employment Delivery Plan.

6•25 The authorities will seek the provision of a Local Labour, Skills and Employment Strategy and Delivery Plan as part of any planning agreement associated

with any application for comprehensive redevelopment. Both documents would need to be produced by the applicant in close partnership with both RBKC and LBHF Economic Development teams in line with the principles of the Councils’ joint Employment and Training Code, which is available from either of the councils’ Economic Development teams.

6•26 The Strategy would need to incorporate predictions on labour demand, skills requirements, targeted recruitment drives, target-setting with contractors and sub-contractors, mechanisms for monitoring employee and contractor employee residency data, jobs fairs, community and careers events and initiatives to increase employment sustainability for local people. In addition, it will be expected to include details of activity to support re-training of individuals affected by the closure of the exhibition centres, activity to provide professional input to career days, teacher training and work experience for young people from both boroughs.

6•27 The Delivery Plan should focus partnership efforts and incorporate complementary activity. This could include links with Job Centre Plus, local schools and colleges, adult education & learning services and Education Business Partnerships.





# 07 RETAIL STRATEGY

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## Overview

7

### Key Objectives

- New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and
- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

## Context

- 7•1 This chapter sets out the requirements for the location, capacity and type of retail provision in the OA. For the purposes of this SPD, retail uses are defined as all those land uses within Class A of the Use Classes Order 2010, which includes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés), A4 (drinking establishments) and A5 (hot food take-always).
- 7•2 There are four designated shopping centres within the immediate vicinity of the OA. These are Fulham Town Centre and North End Road (West Kensington) Key Local Centre in LBHF and Earl's Court Road Neighbourhood Centre and Old Brompton Road (West) Neighbourhood Centre in RBKC.
- 7•3 Further away from the OA there are several very important and successful higher order centres, such as Shepherd's Bush, Hammersmith, Kensington High Street, and King's Road. In addition to the local convenience function, these centres are also important comparison shopping destinations with a catchment that includes the OA.

## Policy Context

- 7•4 **The Mayor's London Plan (2011):**
- 'Retail and Town Centre Development' (Policy 4.7),
  - 'Supporting a Successful and Diverse Retail Sector' (Policy 4.8), and
  - 'Small Shops' (Policy 4.9).
- 7•5 **LBHF's Core Strategy (2011):**
- 'Hierarchy of Town and Local Centres' (Strategic Policy C), and
  - 'Strategic Site and Housing Regeneration Area - FRA 1'.
- 7•6 **RBKC's Core Strategy (2010):**
- 'Earl's Court' (Policy CP10 and associated Vision),
  - 'Earl's Court Exhibition Centre' (Policy CA7),
  - 'Location of New Shop Uses' (Policy CF1), and
  - 'Retail Development within Town Centres' (Policy CF2).

# Retail



Figure 7.1: Illustrative diagram showing the potential distribution of retail across the OA

## Retail Capacity (Comparison)

7

### Key Principle RS1:

Comparison retail demand generated by the new development should be accommodated within existing surrounding town centres. Any comparison retail that cannot be accommodated within existing surrounding town centres should primarily be provided along North End Road, as an extension to Fulham Town Centre, where the potential for an anchor store should also be explored.

- 7•7 The level of retail capacity deemed appropriate within the OA will be based on the ability of existing centres in the vicinity to soak up the identified need. Any retail proposals for development outside of these centres would need to demonstrate that the level of retail proposed is in accordance with the below capacity figures is for the day to day needs of the OA or is complementary to the cultural facilities, and cannot be accommodated in existing centres. Applicants should demonstrate flexibility in terms of scale and scope when showing what capacity the existing retail centres have to provide for the needs of new development in the OA.
- 7•8 The three authorities commissioned retail consultants, Roger Tym and Partners (RTP), to conduct a Retail Need Assessment for the OA, which reported in December 2010. This assessment considered the scale of existing expenditure and potential expenditure

growth, in order to identify whether any new retail floorspace is needed in the wider Study Area (as shown on Figure 7.2). This Study Area includes several existing centres, such as Hammersmith Town Centre and Fulham Town Centre in LBHF and Earl's Court Road, Fulham Road West, Kensington High Street, South Kensington and Fulham Road East (Brompton Cross) in RBKC.

- 7•9 RTP recognised a “quantitative need for between 34,100 and 38,200sqm gross of A Class (excluding A1 service and A2) floorspace by 2016, increasing to between 62,300 and 71,300sqm gross by 2021” for the entire Study Area. RTP advised that “there is physical capacity for growth in the centres within and outside the Study Area that could be used to absorb the growth identified”, which is consistent with the requirements of Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) and the policy context set out above. RTP also advised that “there is an opportunity for growth within the Opportunity Area through the masterplanning process”.
- 7•10 Any comparison retail proposed within the OA should be steered towards North End Road, where it will act as an extension to Fulham Town Centre. The provision of an anchor store in this location should be explored, which has the potential to draw more of a pedestrian footfall up from the Fulham Broadway end of Fulham Town

Centre and help to invigorate the middle section of North End Road, where the vitality and viability of retail has struggled in recent years.

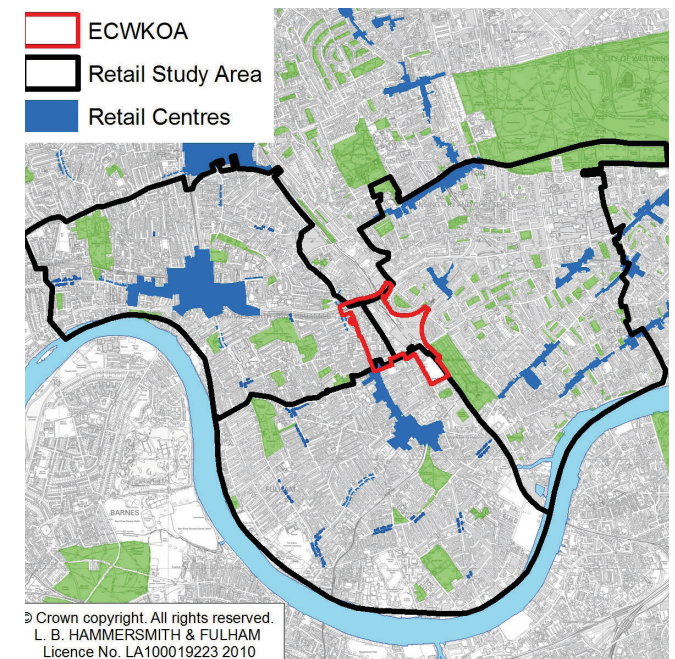


Figure 7.2: Retail Need Assessment Study Area

## Location of Local Needs Retail

### Key Principle RS2:

Retail to meet the day-to-day needs of residents and workers should be accommodated:

- Within and next to Fulham Town Centre;
- Within and next to North End Road (West Kensington) Key Local Centre and around public transport hubs (West Brompton and Earl's Court); and
- a new centre within the OA.

- 7•11 The primary focus for new retail floorspace should be within and adjacent to Fulham Town Centre. Through the regeneration of the OA, there is an opportunity to repair the existing gaps in the non-residential frontage along the eastern edge of North End Road in order to create a rejuvenated, two sided retail street.
- 7•12 Retail should then be steered towards North End Road (West Kensington) Key Local Centre and the areas where the highest levels of pedestrian activity are expected, such as around the Earl's Court (Warwick Road entrance) and West Brompton Underground stations.
- 7•13 It is expected that the new centre within the OA will be of a local scale. The authorities would encourage the new centre to be located within the vicinity of the Empress State Building where it is also expected that the cultural facilities will primarily be located. This centre will therefore also have the potential to complement the new

cultural facilities (please see Chapter 8).

- 7•14 Other non-residential uses such as offices, hotels and cultural and community uses would be appropriate in any of the retail locations identified above.

### Impact of Retail

#### Key Principle RS3:

Applicants must demonstrate that any retail proposed within the OA has a minimal impact on existing centres surrounding the OA.

- 7•15 The location and scale of retail considered appropriate within the OA should be determined through a Retail Impact Assessment, prepared in accordance with PPS4 or successor national policy guidance and Policy 4.7 of the Mayor's London Plan (2011). This must assess the amount of retail development that may be accommodated in particular locations, without having a negative impact on the existing centres in the wider area, and which will allow the existing centres to benefit from a significant proportion of expenditure growth.

### Key Principle RS4:

The provision of retail floorspace should reflect the phasing of the development and be related to the day to day needs of those living and working in the OA at each phase.

- 7•16 New retail should be provided in a way that reflects the phasing of the redevelopment, taking into account the day to day needs of the rising residential and worker population. Too much retail provided too early in the development might harm existing centres. The phasing and timescales of the retail floorspace should be developed accordingly.



Figure 7.3: Retail on North End Road (northern end)

## Retail Controls

7

### Key Principle RS5:

The authorities will control the nature of new retail proposed in the OA by securing a binding Retail Management Plan as part of any planning agreements.

7•17 The authorities will control, through Section 106 agreements and planning conditions, the scale, nature and character of any retail proposed in the OA, in order to ensure that it does not have a detrimental impact on the existing centres and that it responds appropriately to the existing character of the OA and its surroundings. The primary mechanism that the authorities will employ in order to achieve this is to require the applicant to submit a Retail Management Plan, which through a planning agreement, would be a binding document within the terms of which the applicant would be required to operate. The Retail Management Plan will control issues such as:

- phasing,
- unit sizes,
- convenience/comparison split by floorspace,
- limitations on other retail-related uses (A classes),
- range and number of independent shops,
- triggers and sanctions to ensure delivery of an applicant's retail concept,

- prohibition on mezzanines; and
- active frontages.



Figure 7.4: Local retail offer with active frontages

### Key Principle RS6:

The priority in terms of retail typology should be the provision of narrow fronted ground floor units that create a legible streetscape and provide in-built flexibility for expansion and reduction depending on market demands.

7•18 The retail units in the three existing retail centres in the vicinity of the OA primarily consist of ground floor premises within Victorian properties. As a consequence, the unit sizes within these premises tend to be relatively narrow, except where more than one have been combined. These narrow shop fronts create a varied and lively streetscape that is not overly dominated by one or two excessively large retail premises. The authorities wish to see this existing character used as a design precedent for any retail proposed within the OA. In order to create mixed and diverse communities, the upper floors should be predominantly residential, although some may be appropriate for offices. The width of the shop fronts should be reflected in the upper floors, providing vertical emphasis to the buildings.

7•19 The exception to this rule is in the extension of Fulham Town Centre in North End Road, where larger format retail units would be appropriate if commercially viable. Careful attention must be paid to their design to ensure they complement the existing character of the street.

## North End Road Market

### Key Principle RS7:

A number of small units will be secured as affordable shops to provide accommodation for retailers deemed essential for a good retail offer, but that are not able to afford full rents.

- 7•20 Smaller retail units tend to be occupied by independent retailers or 'local' shops, which both Councils encourage through any development proposals. Policy 4.9A of the Mayor's London Plan (2011) para. 7.24 of LBHF's Core Strategy (2011) and Policy CF2 of RBKC's Core Strategy (2010) set out an expectation that affordable retail units should be secured as part of any large scale retail proposals. The authorities will expect an element of affordable retail to form part of any retail offer within the OA, which will be secured through any planning agreement.



Figure 7.5: An independent retailer in the local area

### Key Principle RS8:

Any application for comprehensive redevelopment of the OA should allocate land, with a North End Road address, for the potential relocation of North End Road street market.

- 7•21 North End Road Market currently operates as an on-street market on North End Road in Fulham Town Centre. Although the market currently creates a bustling atmosphere, its on-street location also increases traffic congestion on North End Road and reduces public safety. LBHF's Core Strategy (2011) Policy FRA states that *"relocation (of the market) to an off-street location should be sought, but dialogue should take place with street traders to ensure a logical solution that contributes to the wider regeneration of the area as a whole. The potential regeneration of the Opportunity Area may present new opportunities for relocating the market in the long term"*.
- 7•22 Redevelopment of the OA provides an opportunity to consider relocating the market to within the OA, enhancing its attractiveness and securing its future provision, whilst maintaining its links with North End Road. Space for the relocated market could either take the form of a market square, a wider footway alongside a street or a covered market provided on a major pedestrian thoroughfare through

a building. As part of this relocation, adequate facilities should be provided for the auxiliary needs of the market, such as the storage of temporary stalls, the collection of waste and the needs of delivery vehicles so that they do not clutter streets or inhibit other movement and permeability.

- 7•23 Any decision to relocate the market would be predicated on discussions between LBHF Council and street traders in order to ensure a workable solution. Were the decision to be made to not move the market to this location, the applicants would have the opportunity to put the allocated land to an alternative use. In this instance, LBHF would need to be satisfied that any alternative use would not impact negatively on the vitality and viability of the existing North End Road market.



Figure 7.6: North End Road Market





# 08 CULTURE STRATEGY

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## Overview

8

### Key Objectives

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

- 8•0 This chapter sets out requirements to create a cultural destination consisting of cultural facilities; associated uses, including artists' studios and space for creative industries; public art and hotels.



Figure 8.1: Earl's Court Exhibition Centre 1

## Context

- 8•1 Since the 1880s a variety of culture and entertainment activities, including various shows, exhibitions and a gigantic Ferris wheel, have taken place on the Earl's Court site giving it its cultural 'brand'. In the late 1930s, Earl's Court Exhibition Centre 1 (EC1) was opened to provide over 50,000m<sup>2</sup> of exhibition space. In the early 1990s Earl's Court Exhibition Centre 2 (EC2) was opened. The Earl's Court Exhibition Centres are internationally recognised for hosting significant cultural events, including the Brit Awards, world famous music concerts and various exhibitions / shows, such as the Ideal Home Show.
- 8•2 The Exhibition Centres will host the indoor volleyball during the 2012 Olympic Games, which will further reinforce Earl's Court as an international cultural brand.
- 8•3 The Exhibition Centres make a significant contribution to the local economy, as many shops, restaurants and hotels in the surrounding area benefit from the close proximity to this major visitor attraction.

## Policy Context

- 8•4 The Mayor's **London Plan (2011)**:
- Earl's Court and West Kensington Opportunity Areas; and
  - 'Support for and enhancement of arts, culture, sport and entertainment provision' (Policy 4.6).
- 8•5 **LBHF's Core Strategy (2011)**:
- 'Strategic Policy FRA'; and
  - 'Strategic Site and Housing Regeneration Area – FRA 1'.
- 8•6 **RBKC's Core Strategy (2010)**:
- 'Earl's Court' (Policy CP10 and associated Vision);
  - 'Earl's Court Exhibition Centre' (Policy CA7);
  - 'Creative and Cultural Businesses' (Policy CF6); and
  - 'Arts and Cultural Uses' (Policy CF7b).

# Culture

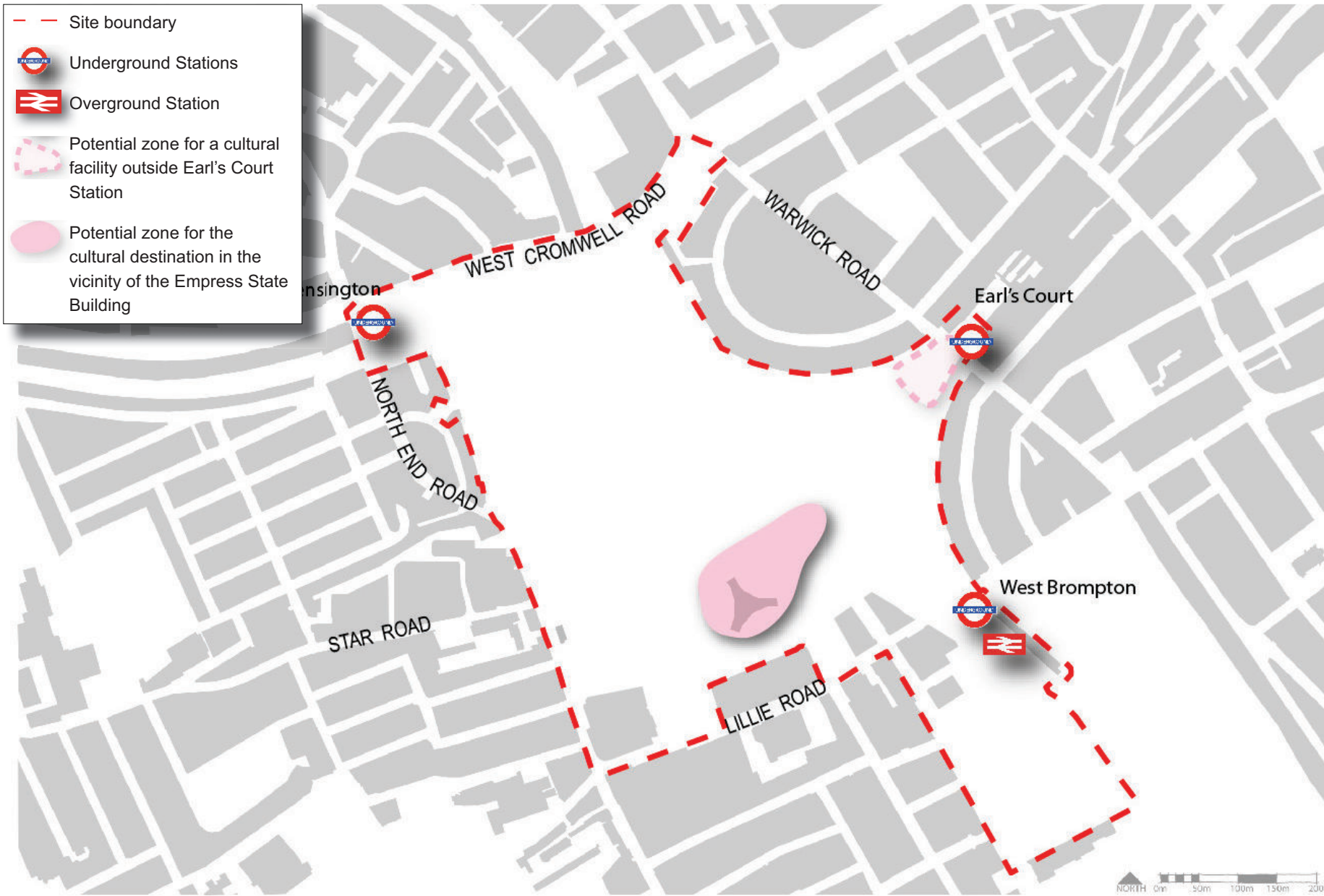


Figure 8.2: Illustrative diagram showing the possible locations of cultural facilities

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## A New Cultural Destination

### Key Principle CS1:

Any redevelopment of the OA that involves the loss of EC1 and/or EC2 should create a new strategic leisure, cultural and visitor destination, providing a range of cultural, artistic and creative facilities.

- 8•7 The aim is to continue Earl's Court's reputation as a cultural destination. The new cultural destination must create an attractive place, with a distinctive cultural identity. Examples of cultural facilities that create successful destinations include: The Kunstmuseum (Stuttgart), Sadler's Wells (Islington), The Lowry Centre (Salford), The Public (West Bromwich), Millennium Square (Bristol) and the Saatchi Gallery in Duke of York's Square (King's Road).
- 8•8 In addition to the cultural uses, the design of buildings and spaces should contribute to this cultural identity. Buildings must be of exceptional architectural quality to mark the location of this important destination. Locating the cultural destination in the vicinity of the Empress State building could also give meaning to the height and presence on the skyline of this existing landmark. This cultural destination should be further enhanced by supporting artistic and creative uses, public art and the use of external space for suitable exhibitions and events. However, the use of external space must not have a negative impact on the residential amenity of new and existing residents in the area.

- 8•9 This cultural destination will benefit residents and visitors, but it will also be important to existing businesses in the surrounding area who currently rely on the existing Earl's Court Exhibition Centres for a lot of their business (as set out in Key Principle ES6 of the Employment Strategy). The cultural destination will therefore need to be delivered in the earliest phases. Shops and services may serve and complement the cultural destination, while providing street level interest. The nature of this retail provision, together with measures to ensure it complements the cultural destination, will be controlled through the Retail Management Plan, as set out in Key Principle RS5.
- 8•10 A written strategy will be required for all planning applications involving the demolition of EC1 and/or EC2, demonstrating how that application proposes to develop the OA into a viable cultural and creative destination. This strategy will need to include details of the location, size, management and capacity of the proposed facilities, together with an assessment of their likely impact on residents and businesses in the wider area. This strategy will also need to include details on the disposition of supporting land uses, including affordable artists' studios, other creative workshop and studio space and details on how the retail strategy will support the cultural destination. Where proposed, planning conditions will be used to require more detailed cultural strategies

that will, among other things, include details on the user / occupier of proposed cultural facilities. The Mayor of London and the boroughs must be engaged during the preparation of the cultural strategies.

### Key Principle CS2:

Redevelopment of the OA will need to provide at least one large cultural facility to form an anchor, together with a number of other such facilities, to form a cultural destination.

- 8•11 An analysis of various cultural venues throughout Great Britain is shown in Table 8.1. With this in mind, the authorities will expect that, to be considered 'large', cultural facilities should have:
- a minimum footprint of 2,500sqm (GEA);
  - a minimum floorspace of 10,000sqm (GIA);
  - a hosting capacity of at least 2,000 visitors; and
  - attract approximately 750,000 visitors per year.
- 8•12 The extent to which one or several attractions anchor the cultural destination will not only depend on the size of the venue(s), but also the offer, location and how the attraction(s) are supported by smaller cultural venues, artists' studios, other creative workshop and studio space and bars / restaurants. Table 8.1 lists examples of smaller cultural facilities, showing that they can occupy relatively

## A New Cultural Destination

small spaces, which is likely to meet a demand for cultural space from local organisations. The extent to which the arts and cultural offer create a destination must therefore be considered in the cultural strategy, as required above.

- 8•13 RBKC Core Strategy Policy CA7d indicates that a cultural facility must be located near to public transport accessibility. As Earl's Court Underground Station is the busiest station in the OA, at least one cultural facility must be located in the same general location. The type, size and offer must be such to sustain a culture facility in this location for the longer term. In this location it will help to create a sense of arrival to the OA from Earl's Court Underground Station. It will also ensure cultural facilities are provided early in the site's development, aiding those existing business that depend on the current footfall from the exhibition centres.
- 8•14 In addition to delivering a cultural destination, financial contributions will also be sought for enhancements to nearby heritage attractions, such as Brompton Cemetery.

### Key Principle CS3:

Redevelopment of the OA will need to provide affordable artists' studios and other creative workshop and studio space.

- 8•15 In addition to the cultural facilities, redevelopment of the OA will need to provide affordable artists' studios and other creative workshop and studio space. The Mayor of London's Cultural Strategy (2012 and beyond) states that 'an important means by which arts and culture have contributed to urban regeneration is through workspace and artist studios'. This strategy makes specific reference to the large and constant demand for artists' studio space in London, quoting one specific provider, ACME, who have a waiting list of more than 3,500 artists. The strategy required under Key Principle CS1 will need to include information on the design, location, size, management and number of artists' studios and other creative workshop and studio space and its affordability.

### Key Principle CS4:

Redevelopment should create opportunities to use art and culture to engage the new and existing communities at various stages and phases throughout the redevelopment.

- 8•16 Culture and art can play an important role in integrating the existing and new communities, whilst also keeping the existing community engaged through the development process. This can happen at various stages during the construction process, such as engagement events with the existing community (explaining aspects of the development process); using art or relevant information to improve the look of the hoardings during demolition and construction; and events where the new and existing community have an opportunity to interact. Applicants should also explore opportunities for vacant buildings to be used to accommodate pop up exhibitions and cultural events; although in some instances planning permission and event licences may be required. The authorities will expect that the strategy required under Key Principle CS1 sets out approaches to delivering this principle, where measures would be secured through planning condition or planning agreement.

## A New Cultural Destination

8

Name	Facilities	Footprint (GEA)	Internal floorspace/capacity	Distance from Public Transport
Earl's Court Exhibition Centre (existing use) - London	Exhibition and assembly space	53,000m <sup>2</sup>	97,000m <sup>2</sup> of exhibition space and meeting rooms for up to 900 visitors. Attracts about 3 million visitors / yr.	50m (Earl's Court Underground Station)
The Lowry Centre – Salford, Manchester	2 theatres, studio space, gallery, conference spaces, bars and restaurants	9,000m <sup>2</sup>	1600m <sup>2</sup> of gallery space, 2700m <sup>2</sup> of conference and meeting space, theatres seating 1,730 and 466 respectively and studio for 180 seats	450m (Harbour City Tram Station)
Commonwealth Institute - London	Exhibition and assembly space	4,500m <sup>2</sup>	10,000m <sup>2</sup> total. Aiming to attract 500,000 people per year.	500m (High Street Kensington Underground Station)
The Public - West Bromwich, Birmingham	Gallery, flexible theatre and conference space, workshops and offices	2,500m <sup>2</sup>	9000m <sup>2</sup> total. Theatre for 249 seats (400 standing), meeting and conference space for an additional 350 visitors	460m (West Bromwich Central Tram Station)
Grand Canal Theatre - Dublin	Theatre, conference facilities. The theatre is integrated into a commercial development	2,400m <sup>2</sup>	2000 capacity auditorium, adjoining 45,000m <sup>2</sup> of office and retail floorspace	500m (Grand Central Dock Railway Station)
Saatchi Gallery – Chelsea, London	Gallery	2,000m <sup>2</sup>	6,224m <sup>2</sup> of flexible gallery, exhibition and meeting space. Attracts about 1 million visitors / yr.	380m (Sloane Square Underground Station)
Institute of Contemporary Arts - London	Gallery, 2 screen cinema, theatre/music venue, bar/café and meeting/conference space	1,900m <sup>2</sup>	2 screen cinema for up to 230 visitors, theatre/music venue for up to 300 standing, 300m <sup>2</sup> of meeting/conference space	200m (Charing Cross Underground Station)
Sadlers Wells – Islington, London	2 auditoriums, 4 meeting/conference spaces, rehearsal studio and a small scale bar/cafe	1,650m <sup>2</sup>	Flexible main auditorium with a capacity of 1,560 all seated with reconfigurations for between 1,000 and 1,800 attendees, smaller auditorium has a capacity of 200 seats. Space for conferences, meetings or lectures for up to 550 visitors (depending on layout)	540m (Angel Underground Station)
Nottingham Contemporary - Nottingham	Four galleries, a performance and film space, meeting rooms, a learning room, Café/Bar	1,500m <sup>2</sup>	3,000m <sup>2</sup> of exhibition space	375m (Nottingham Railway Station)

Table 8.1: Cultural venue case studies

## Public Art

### Key Principle CS5:

High quality public art will be required to enliven public spaces, create distinctive places and contribute to the identity of the cultural destination.

- 8•17 Public art can help to create a sense of place and identity by adding to the character of the townscape. This is particularly important when considering the type of place or identity being created in the cultural destination. However, public art must always be of the highest quality, and be carefully located so it does not restrict pedestrian movement or add to street clutter. The local community should be engaged in the design and location of new public art installations.
- 8•18 Policy 7.5B of the Mayor's London Plan (2011) states that 'Opportunities for the integration of high quality public art should be considered'. Guidance on public art is also provided in the Mayor's Cultural Strategy (2012 and beyond). RBKC's Core Strategy (Policy CR4) 'requires all major development to provide new public art that is of high quality and either incorporated into the external design of new buildings or within the public realm'. Public Art in RBKC would also need to have regard to RBKC's Public Art Supplementary Planning Guidance, 2004.
- 8•19 The civic spaces required under Key Principle UF10, will need to demonstrate how public art is integrated into design of the public realm for the entire OA.

## Hotels

### Key Principle CS6:

Any application for the comprehensive redevelopment of the OA will be expected to include an element of hotel provision. At least 10% of the bedrooms in any hotel development should be wheelchair accessible.

- 8•20 There is a high concentration of hotels within the vicinity of the OA and the one hotel that is located within the OA (295 North End Road). The concentration of hotels is mainly due to the number of visitors attracted by Earl's Court's accessible location and the Exhibition Centres.
- 8•21 Annex 1 of the Mayor's London Plan (2011) requires development in the OA to explore the provision of, amongst other things, hotels. Policy 4.5A of the Mayor's London Plan (2011) 'seeks to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10% should be wheelchair accessible'. Policy 4.5B of the Mayor's London Plan requires development to contribute towards meeting the requirements in Policy 4.5A. RBKC's Core Strategy (2010) Policy CA7e and CF8b identifies the Earl's Court Exhibition Centre Strategic Site as being an appropriate location for new hotels. LBHF's Core Strategy (2011) 'Strategic Site and Housing Regeneration Area - FRA 1' identifies hotels as an appropriate use as part of any comprehensive regeneration of the OA.

- 8•22 There are different hotel markets to be served, including the leisure market, where a spa and pool would be required, the business market, which would need conference facilities and a business centre, and the budget market. Comprehensive redevelopment of the OA is of a sufficient scale to meet the demand from different hotel markets.



Figure 8.3: 'Unfurl', by Eilís O'Connell at Kensington Gate





# 09 SOCIAL & COMMUNITY FACILITIES

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## Overview

9

### Key Objective

Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

- 9•1 This chapter sets out the requirements for the type, quantum and broad locations for the provision of social and community facilities necessary to support the comprehensive redevelopment of the OA, in relation to the provision of:
- Education facilities (nursery, primary and secondary);
  - Health facilities;
  - Sports and leisure facilities;
  - Police facilities; and
  - Community and library facilities.
- 9•2 Please note, that there are other facilities often regarded as social and community uses, such as pubs, chemists and post offices. All these uses are shop uses, falling within the 'A' use classes, and are therefore dealt with as part of the Retail Strategy, see Chapter 7.

## Policy Context

### 9•3 The Mayor's London Plan (2011):

- 'The 2012 Games and their Legacy' (Policy 2.4)
- 'Protection and Enhancement of Social Infrastructure' (Policy 3.16);
- 'Health and Social Care Facilities' (Policy 3.17);
- 'Education Facilities' (Policy 3.18); and
- 'Sports Facilities' (Policy 3.19).

### 9•4 LBHF's Core Strategy (2011):

- 'Strategic Site and Housing Regeneration Area – FRA 1'; and
- 'Supporting Community Facilities and Services' (Policy CF1).

### 9•5 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' Strategic Site' (Policy CA7);
- 'Infrastructure Delivery and Planning Obligations' (Policy C1); and
- 'Social and Community Facilities' (Policy CK1).



# Education

## Key Principle SC1:

Any planning applications within the OA will be assessed against both RBKC and LBHF child yield formulas below in order to provide the relevant educational (nursery, primary and secondary) floorspace and associated fit out costs to cater for the population uplift in the area.

- 9•6 Educational provision in the vicinity of the OA is currently at capacity. Comprehensive redevelopment of the OA would lead to a large increase in population. Some of this population would be of school age and any development would need to cater for their educational needs.
- 9•7 Child yield formulas are used to estimate the possible educational needs resulting from any development. RBKC set out their child yield formula in their Planning Obligations SPD (2010), shown in Table 9.1. In LBHF, the 2004 Wandsworth Housing Survey has been used as the basis for child yield calculations (see Table 9.2). The model has been adapted to reflect LBHF's criteria for the allocation of intermediate housing, which gives priority to couples and single parents with children when allocating accommodation with two or more beds. The methodologies of the boroughs' child yield formulas are consistent with and reflect GLA guidance and advice.
- 9•8 Any planning application submitted for the

redevelopment of the site would have to be assessed against these child yield formulas in order to ascertain the anticipated increase in nursery, primary and secondary school numbers.

- 9•9 The authorities will secure the provision of floorspace to cater for the needs arising from any development, as well as financial contributions towards the fit out of any educational provision. Developers should have regard to Building Bulletin 99 when calculating the quantum of floorspace necessary for a new primary school and Building Bulletin 98 when calculating the quantum of floorspace necessary for a new secondary school. Any primary and secondary school should be located together and should be positioned in an easily accessible location for all new residents living in the OA. The exact location should also be predicated on discussions with both boroughs' education departments, and should be provided within the early phases of development.



Figure 9.1: Hadley Learning Centre, Telford  
Photograph by Dave Morris

Bedrooms	Market/ Intermediate	Social Rented
1	0.01	0.09
2	0.03	0.90
3	0.20	1.80
4+	0.31	3

Table 9.1: RBKC child yield formulas

Bedrooms	Market	Intermediate	Social Rented
1	0.01	0.01	0.07
2	0.11	0.255	0.40
3	0.42	1.135	1.85
4+	0.98	1.44	1.90

Table 9.2: LBHF child yield formulas

# Health

9

## Key Principle SC2:

Any planning application for comprehensive redevelopment of the OA will need to provide a NHS health facility. The size of this facility should be calculated based on the methodology set out in this SPD. The facility should be located in an easily accessible location for all residents living within the OA and should be provided within one of the earlier phases of development.

9•10 Within both boroughs, the primary healthcare provision is currently at full capacity and the increase in population within the OA will give rise to demand for an additional NHS health facility. This should be provided in the form of a single facility within the OA, at an early phase in the development and in a location that would be easily accessible for residents living in both boroughs. If the optimum location for this facility is in one of the later phases, the facility could be moved at that stage, with the original premises being converted to an alternative use. The calculation for the size of this facility is based on the following methodology:

- If the population is under 10,800, applicants will be required to provide a Health Centre. The size of the facility will be calculated based on a need for 150sqm per GP and one GP for every 1,800 residents.
- If the population is over 10,800, applicants will be required to provide an integrated

Primary Care Centre. The size of the facility will be calculated based on a need for 225sqm per GP and one GP for every 1,800 residents.

- Wandsworth's 2004 New Housing Survey should be used as the basis for calculating population yield.
- 9•11 The primary healthcare centre must be fully accessible with a viable street presence and meet the current requirements for the Equality Act 2010. Reference to current NHS guidance for planning new Primary and Social Care Premises is set out in the Department of Health's (DH) Design Guidance including "Facilities for Primary and Community Care Services: Planning and Design manual 1183:0.6 England" published 2011 and "Health Building note (HBN) 00-10 Performance requirements for building elements used in healthcare facilities 8941:0.6 England" published April 2011. If an integrated Primary Care Centre is required it would need to include dental services, space to support the specialist skills that GPs are developing in response to local health and wellbeing needs, outreach facilities and home-based medical support.

## Key Principle SC3:

Any major planning applications in the OA must be accompanied by a Health Impact Assessment.

9•12 An analysis of the health impacts of the proposed developments will need to factor-in the following sectors:

- Acute healthcare;
- Mental healthcare;
- Intermediate healthcare;
- Primary healthcare.

9•13 The Health Impact Assessment would need to consider impacts on minority groups, future trends, emerging Government policy and health reforms and advances in technology and social change which may have an impact on future healthcare delivery, such as demographic shifts to an increasing elderly population. The Health Impact Assessment would need to assess impacts of demolition and construction on the new and existing population.



## Sports and Leisure

### Key Principle SC4:

Any proposals for redevelopment of the OA must provide a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population. These facilities will need to cater for a variety of incomes. A proportion of affordable sports and leisure provision will be secured as part of any planning agreement. The facilities provided should target existing deficiencies in indoor and outdoor sports provision, particularly multi-use outdoor pitches and indoor multi-use sports courts.

- 9•14 Policy 3.20 of the Mayor's London Plan (2011) promotes applications that improve access to sports and leisure provision. Policy CF1 of LBHF's Core Strategy (2011) states that the OA is considered appropriate for major new leisure and recreation facilities. RBKC's Core Strategy (2010) also recognises the importance of access to sports and leisure, stating in para 29.2.4 that planning obligations will be negotiated to ensure access to such facilities.
- 9•15 Any application will be expected to provide a range of sports and leisure facilities to cater for the needs of the future population. These facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. The authorities will secure a proportion of

affordable sports provision. This should take the form of discounted membership fees and discounted non-membership access fees.

- 9•16 Sport England data (Local Sports Profiles Toolkit 2011 et. al.), together with local data, shows there to be existing deficiencies in both indoor and outdoor sports provision, particularly multi-use outdoor pitches and indoor multi-use sports courts. Any applicant would need to consult the borough leisure departments and target these particular deficiencies in their sport and leisure offer.

### Key Principle SC5:

Any application for comprehensive redevelopment of the OA must provide sports facilities that allow at least one sport to be developed to an "elite" standard, in order to retain the legacy of the London 2012 Olympics.

- 9•17 The Mayor's London Plan (2011) recognises the importance of the 2012 Olympic Games to London. Policy 2.4Ch states that *"the Mayor will, and boroughs should take opportunities presented by the 2012 Olympic and Paralympic Games and their legacy to increase participation in sport and physical activity"*. The importance of developing sports infrastructure is recognised in the Mayor's Sports Legacy Plan, 'A Sporting Future for London'.

- 9•18 The Earl's Court Exhibition Centres are to be used during the 2012 Olympics for volleyball. In order to retain the sporting legacy of the site, any application for comprehensive redevelopment should ensure that the sports and leisure provision allows for at least one sport to be developed to an "elite" standard (i.e. it meets regional performance targets for one sport's governing body).



## Police Facilities

9

### Key Principle SC6:

The authorities will secure, through any planning agreement(s):

- A community policing facility and financial contributions towards staffing the facility;
- Closed Circuit Television (CCTV) within the OA; and
- Financial contributions towards the expansion the boroughs' CCTV control centres.

- 9•19 Both Councils' policing facilities are currently at capacity. Any development in the OA will need to contribute towards increasing the policing capacity needed to cater for the new population.
- 9•20 The authorities will require development to deliver a police shop, located within a retail frontage. It should operate a small base from which the police can launch patrols and at which the new community would be able to have day to day contact with the police service. Financial contributions will be sought towards the staffing of this facility.
- 9•21 CCTV will need to be provided by the developer and linked into the borough's CCTV network. Alternatively, a financial contribution will be sought for the boroughs to implement the CCTV. A contribution will also be required to increase staffing of the boroughs' CCTV control centres to cater for the increased demand from the expanded CCTV network.



## Community Space

### Key Principle SC7:

Redevelopment of the OA must provide a community hub of 4,500m<sup>2</sup> GIA. This new community hub should have a library on the ground and possibly first floors, with the remainder of the building providing multi faith space, youth space, children's centre, affordable and flexible office, training and meeting space, adult learning and training space and halls for hire for use by the voluntary sector and residents. Provision must be made available for new community space before any existing community space is demolished.

9•22 The OA is currently adequately served in terms of community space. The Gibbs Green and West Kensington estates each have their own community hall and there are a number of other community halls in the vicinity of the OA. There are two libraries in close proximity to the OA – Baron's Court Library in LBHF and Brompton Library in RBKC. Baron's Court Library has reduced opening hours and Brompton Library has limited capacity to accommodate any additional users and is not an ideal location for a library, given the population increase proposed in the OA.

9•23 Redevelopment of the OA will need to reprovide any lost community floorspace as well as provide additional space to cater for the new population living within the OA. The boroughs have assessed the likely floorspace requirements that

the new population will generate and will expect any proposals for comprehensive redevelopment to provide a community hub, with up to 4,500sqm Gross Internal Area, which combines community facilities. New development will need to ensure that the new community hub is available for hire before either of the existing community spaces are demolished or that temporary spaces of at least equivalent floorspace are provided.

9•24 This new building must be provided within the early phases of development and must be easily accessible to the new community and residents of both boroughs, fronting onto a street with high footfall and designed as a new modern civic building, with a strong visual presence. The building must have active ground floor

uses and should look to provide a variety of different community spaces, such as a library, multi faith space, youth space, children's centre, adult learning and training space, a community café, flexible office and community space and halls for hire. The authorities will require that the spaces provided are affordable and accessible to all and provide for diverse cultural needs.

9•25 This community hub should not only provide a valuable resource for the local community and community groups, but should help new residents of the OA integrate into the existing social fabric. This could be achieved by providing community support, local information and information for new and existing residents on the progress of redevelopment in the OA.







**10 TRANSPORT AND ACCESSIBILITY STRATEGY**

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## Overview

## Context

### Key Objectives

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

10•1 This chapter sets out what improvements to the transport network will be necessary to support development. These include improvements to the public realm to encourage walking, improved cycle facilities and increased capacity on the public transport and road networks. This chapter is informed by a Strategic Transport Study, a review of which can be found on the authorities' websites.

- 10•2 The OA is a transport dominated site with a mix of transport infrastructure adjoining or running through and under it. The local transport facilities play an important role in connecting Earl's Court to the rest of London and the UK as a whole but these connections also create significant local severance across the area particularly for pedestrians and cyclists, which impacts on local quality of life and accessibility to goods, services and employment.
- 10•3 As is the case in most of London there is an extensive pedestrian footway network along existing local streets and roads. However there are some areas where the quality of this network needs improving. This, along with the severance caused by the rail lines and Exhibition Centres, creates a barrier to north-south and particularly east-west pedestrian and cycle movement through the OA. This isolates the OA, reduces the attractiveness of walking and cycling and restricts access to local public transport.
- 10•4 The OA is served by three London Underground stations; Earls Court, West Brompton and West Kensington. These stations provide access to the District and Piccadilly Lines. West Brompton is also served by the Overground network and is a strategic interchange as designated by the Mayor's Transport Strategy providing a key interchange between orbital and radial rail services. The edges of the OA are thus

well served with a high Public Transport Accessibility Level, but the centre has a low score of 2, on a scale of 0 (little or no access) to 6b (most excellent access).

- 10•5 The London Underground lines serving the OA are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly Lines in the AM peak period. Significant increases in capacity are planned and funded for the District and Piccadilly Lines as part of the London Underground upgrades. The District Line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is no definite date for the upgrade of the Piccadilly Line, which would provide a capacity increase of 24%, although it is expected to be complete prior to 2031. Crossrail is planned to open in 2018, which will release capacity on the Central Line, which in turn will draw passengers from the Piccadilly Line, thereby releasing some limited capacity.
- 10•6 All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound Southern trains services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancements.

# Context

In addition, crowding will increase to over three people per square metre on all southbound services to West Brompton.

- 10•7 Significant parts of the highway network are currently operating at capacity with a number of traffic delays at junctions in and around the OA, including at all four corners of the site, during both peak periods as well as the weekend. These are illustrated in Figures 10.4 and 10.5 overleaf.
- 10•8 The A4 and the Earl’s Court One Way System have a key role in the maintaining

the performance of the strategic highway network. This also impacts on the ease and attractiveness of pedestrian and cyclist movement, residential amenity, access to bus services and the townscape of the areas through which they run, including the OA.

- 10•9 The OA currently includes 2,500 car parking spaces. On-street in RBKC there is a mixture of residents’ and pay and display parking with limited spare capacity. In LBHF the available parking for visitors is greater because dual use parking bays are provided.

# Policy Context

- 10•10 **The Mayor’s London Plan (2011):**
  - ‘Strategic Approach’ (Policy 6.1).
- 10•11 **LBHF’s Core Strategy (2011):**
  - ‘Strategic Site and Housing Regeneration Area – FRA 1’; and
  - ‘Transport’ (Policy T1).
- 10•12 **RBKC’s Core Strategy (2010):**
  - ‘Earl’s Court Exhibition Centre’ (Policy CA7);
  - ‘Earl’s Court’ (Policy CP10 and associated Vision);
  - ‘Improving Alternatives to Car Use’ (Policy CT1); and
  - ‘New and Enhanced Rail Infrastructure’ (Policy CT2).

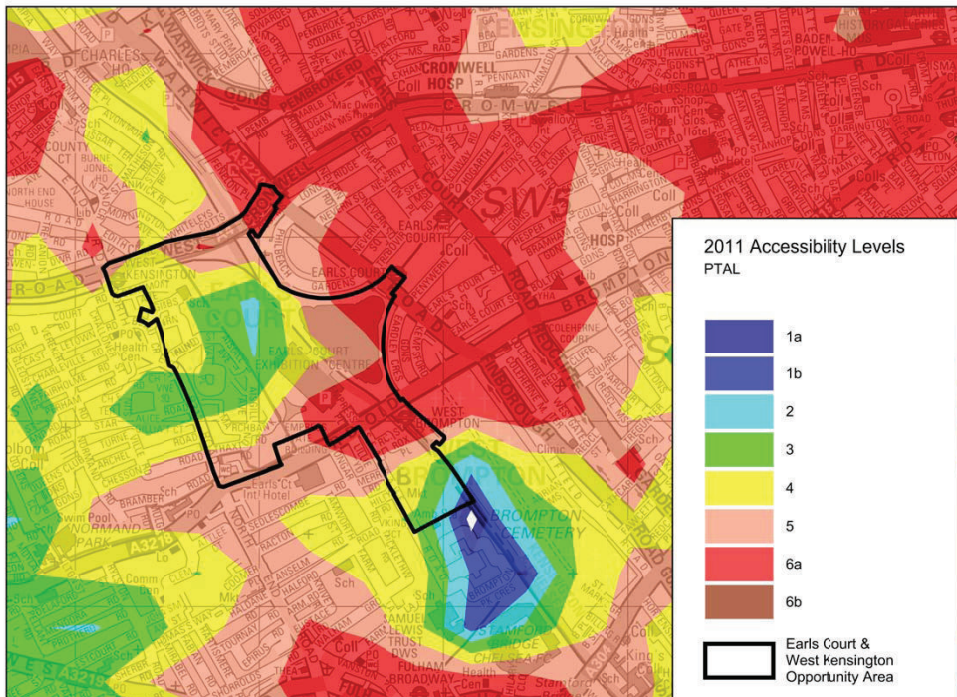


Figure 10.1 Existing public transport accessibility levels (2011)

# Context

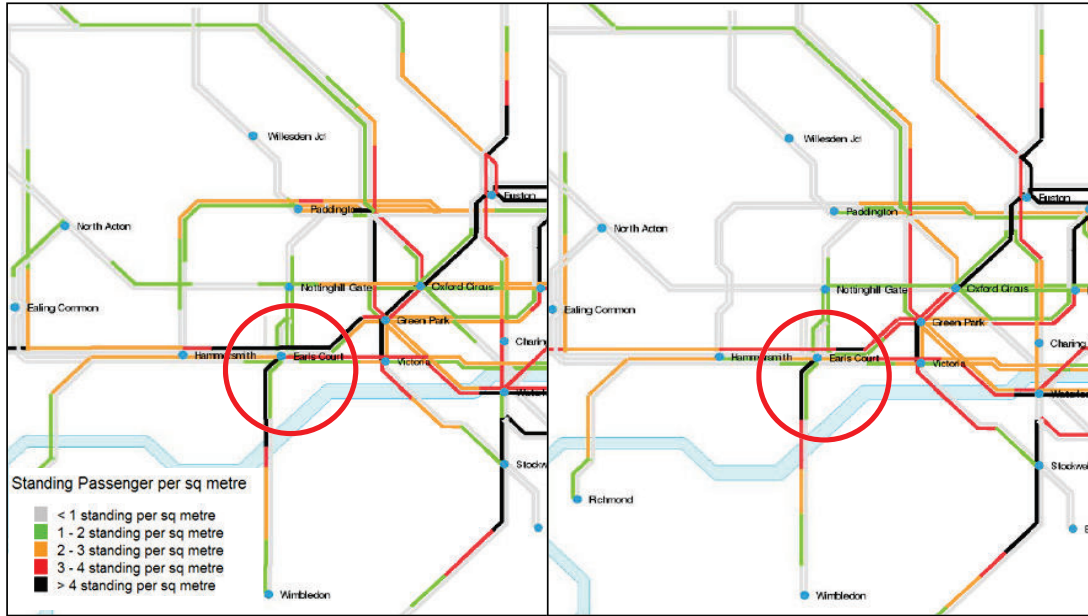


Figure 10.2 Crowding on the London Underground network 2007(left), 2031(right)



Figure 10.3 Crowding on the London Overground and National Rail Network, 2007(left), 2031(right)

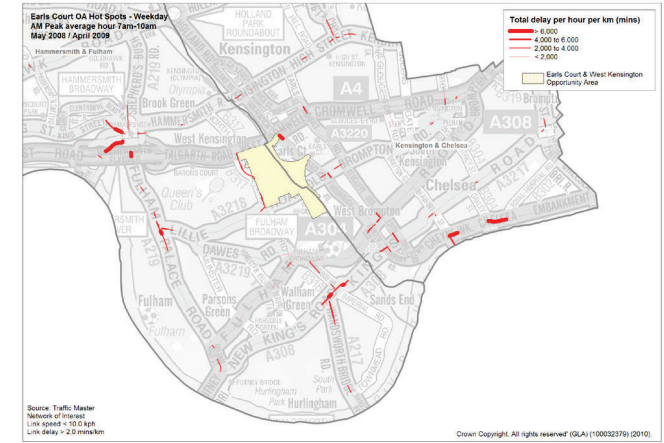


Figure 10.4 traffic delay in the AM peak hour (2008 - 2009)

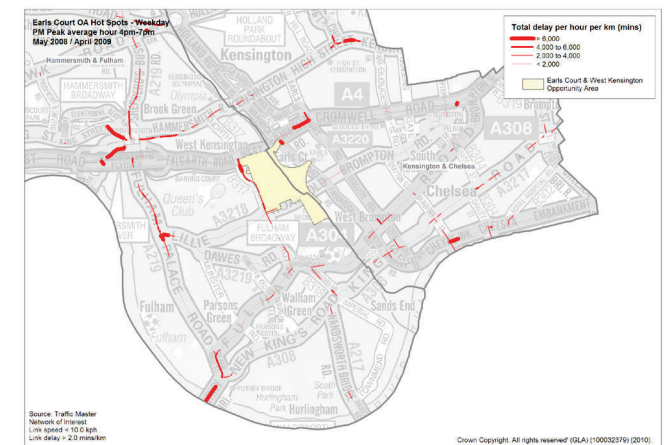


Figure 10.5 traffic delay in the PM peak hour (2008 - 2009)

## Transport Capacity

### Key Principle TRN1:

Any development proposals should demonstrate by way of robust Transport Assessments that the cumulative impact of development on the transport networks is acceptable.

10•13 This chapter sets out the transport impacts of, and interventions and further work required to support a development scenario that includes 5,560 homes and 12,165 jobs.

10•14 Two higher transport scenarios were considered in the first draft of the SPD:

- 8,286 homes and 24,050 jobs; and
- 10,647 homes and 31,895 jobs.

These scenarios were both discounted due to their impacts to the transport networks and not considered further in this draft. The first of these scenarios could not be supported given the increases in vehicle delay on the A4. The second scenario resulted in unacceptable impacts to both the highway and public transport networks.

### Key Principle TRN2:

Development should be supported by robust Transport Assessments that set out phase by phase what the cumulative impact of development will be and how it will be mitigated at each phase.

10•15 Any applications for development in the OA should demonstrate, by way of robust Transport Assessments, that phase by phase the impacts of development are properly mitigated and can be accommodated on the transport networks. Appropriate controls will need to be agreed to ensure development is not implemented until capacity improvements and other mitigations are provided.

## Walking and Cycling

### Walking

#### Key Principle TRN3:

All streets within the OA should be designed and built to adoptable standards and offered to the Highway Authority for adoption.

#### Key Principle TRN4:

All streets within the OA should be accessible to all with appropriate gradients where changes in level are experienced, generous footway widths and accessible crossing facilities. The streets should provide safe and direct north-south and east-west movement for pedestrians and cyclists and integrate well with the surrounding streets.

10•16 Development should provide a coherent network of streets that opens the OA up to pedestrians and cyclists, is accessible to all users and allows quicker access to the public transport network. By doing this Public Transport Accessibility Levels in the centre of the OA will be increased from level 2 (moderate) to 6a (excellent). The neighbourhoods surrounding the OA will also feel more connected with each other and to the new communities within the site itself. Appropriate controls will need to be agreed to ensure development is not implemented until capacity improvements and other mitigations are provided.

## Walking and Cycling

10

- 10•17 All new streets created within the OA should be built to adoptable standards and will be offered for adoption to the Local Highway Authorities. Adopting the streets would ensure that design, construction and future maintenance will be of the highest standards and it will secure public access in perpetuity.
- 10•18 A route for pedestrians and cyclists above the alignment of the West London Line could create an alternative route to Warwick Road, where footfall is already high. Improvements to connections to the north and south of the site at either end of the route should be investigated in order to create links with existing and planned pedestrian and cycle routes in the area. Opportunities for public open space in this location are considered in more detail in the Urban Form Strategy (Chapter 4).

- 10•20 Development will add significantly to footfall in the area, as shown in Figure 10.6. This shows total pedestrian trips, including existing and forecast additional pedestrian movements within and adjacent to the OA. The distribution of pedestrian trips is based on existing movements in the area and identifies the proportion of new trips likely to be made to each of the stations.

### Key Principle TRN6:

New development should fund environmental improvements and deliver wider, clearer and higher quality footways on the existing streets surrounding the OA and contribute towards the A4 improvement scheme.

### Key Principle TRN5:

Development should provide a coherent pedestrian wayfinding strategy in and around the OA .

- 10•19 A coherent wayfinding strategy will be required to encourage walking and cycling within and around the OA. This strategy will need to reflect Transport for London's Legible London standards and utilise all opportunities of providing navigational information to pedestrians, such as bus stops and the Mayor's Cycle Hire Scheme docking stations.

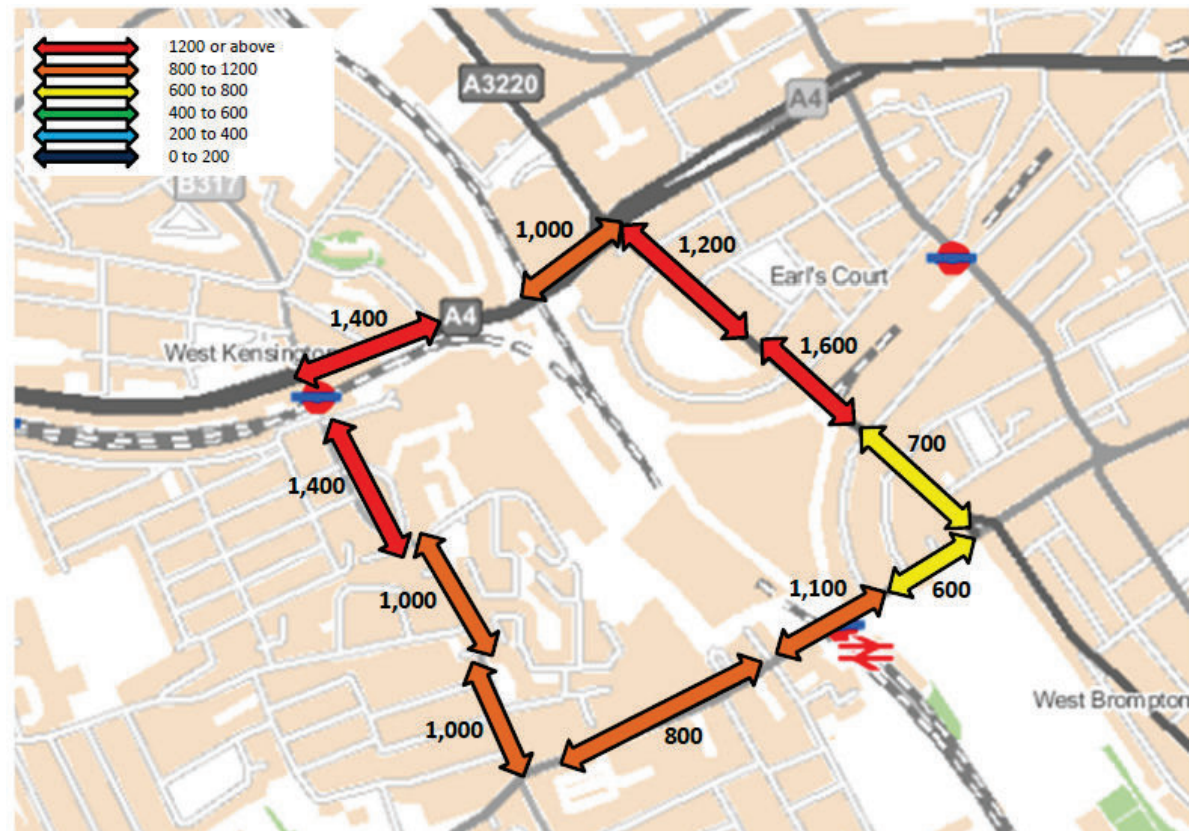


Figure 10.6 Footfall on streets surrounding the OA in 2031, including development footfall

# Walking and Cycling

10•21 There is generally sufficient footway width to accommodate the footfall generated by development on the existing streets. However, the clear footway width (i.e. the footway space available for pedestrians once street furniture has been taken into account) will be insufficient in some locations, either because of narrow footways or excessive and poorly coordinated street furniture. In particular, clear footway widths will need to be increased on North End Road around West Kensington station, around the Earl’s Court station entrance on Warwick Road and around West Brompton station on Old Brompton Road (see Figure 10.7). Rationalisation and removal of street furniture will help increase clear footway width in these locations.

10•22 The detailed design of the internal network of pedestrian routes within the OA should be attractive and convenient for pedestrians as these will need to be designed to relieve the existing footways as far as possible.

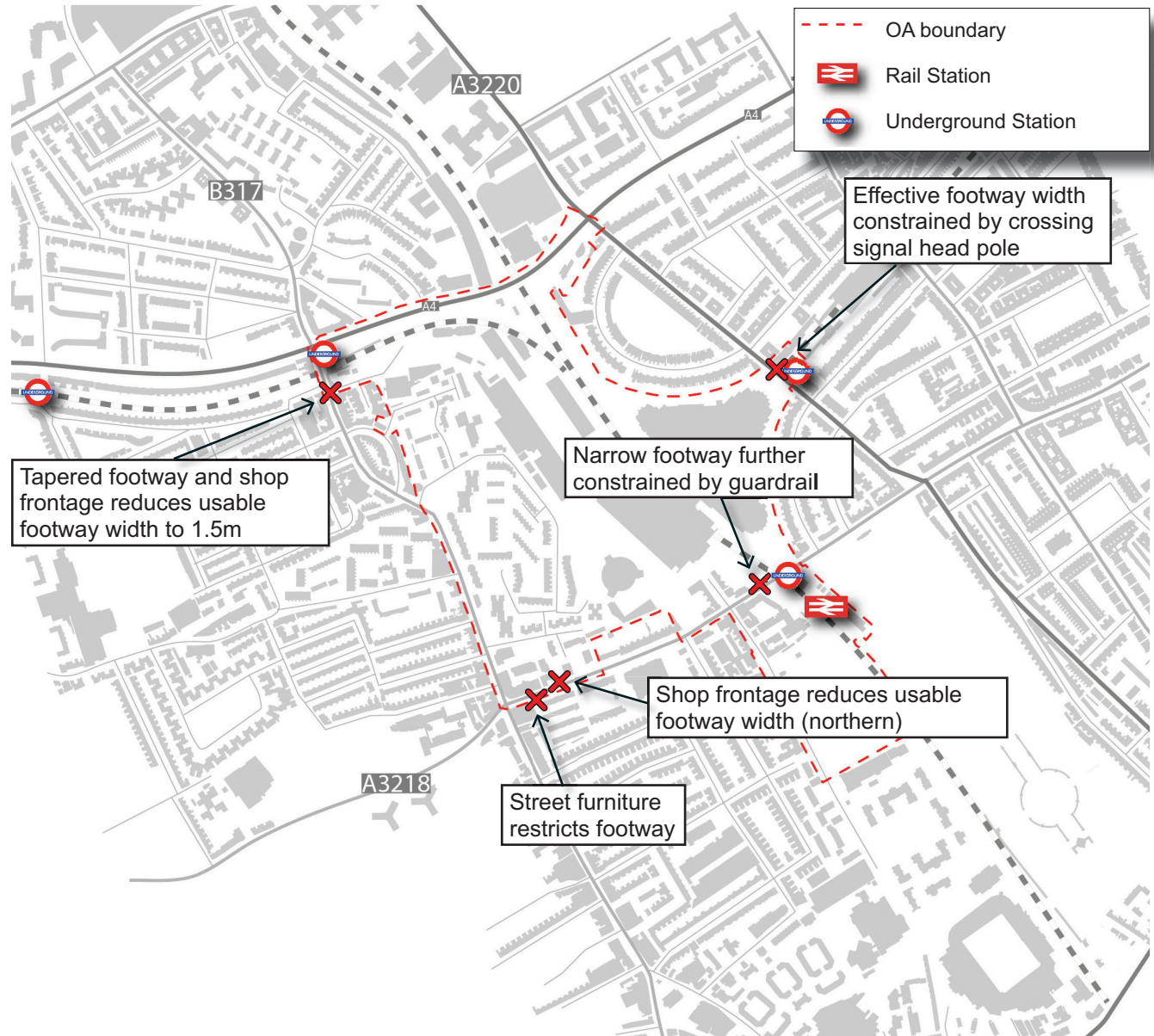


Figure 10.7 Existing locations with sub-standard footway widths on the streets



## Walking and Cycling

10

10•23 The streets surrounding the OA, including North End Road, Warwick Road, Lillie Road, Old Brompton Road, the A4 and Earl's Court Road all require improvements if they are to accommodate higher levels of pedestrian footfall. The development should therefore deliver significant environmental improvements to these streets including repaving and more consistent dropped kerbs. Given the additional footfall added to the A4 by development, contributions will be required towards the A4 improvement scheme, which is being developed by TfL and the boroughs. The treatment of the spaces around the stations will also need to be improved to provide more coherent interchange between transport modes as well as better pedestrian environments.

10•24 Environmental improvements to the Warwick Road entrance at Earl's Court station will also be essential and should include removal of the existing hoardings. The improvements will need to form part of a coherent urban design response that includes links into a new civic space and accommodates the necessary interchange improvements.

### Key Principle TRN7:

New development should deliver new pedestrian crossings and improve existing crossings in order to meet the increased demand from development and significantly improve the pedestrian environment and access into and out of the OA.

10•25 The level of pedestrian footfall set out in Figure 10.6 will also have an impact on pedestrian crossings in the area. The crossing on Old Brompton Road has insufficient width to accommodate the predicted development footfall and will need to be widened. To help relieve the crossing at Warwick Road and reduce congestion within Earl's Court station, new development should refurbish and reopen to the public the existing pedestrian tunnel beneath Warwick Road to allow direct access to the Underground station. A new pedestrian crossing will be necessary on the A4 and should be incorporated into a new junction into the site. The existing crossings on the A4 at North End Road and Warwick Road would be improved by the introduction of straight ahead crossings instead of the staggered arrangements that currently exist. However, such changes, including a crossing at the new A4 junction, are likely to have an impact on traffic capacity and will need to be carefully reviewed to ensure an appropriate balance of users' needs is achieved.



Figure 10.8 Interaction between cyclists and pedestrians



Figure 10.9: Mayor's Cycle Hire Scheme at Soho Square

# Walking and Cycling

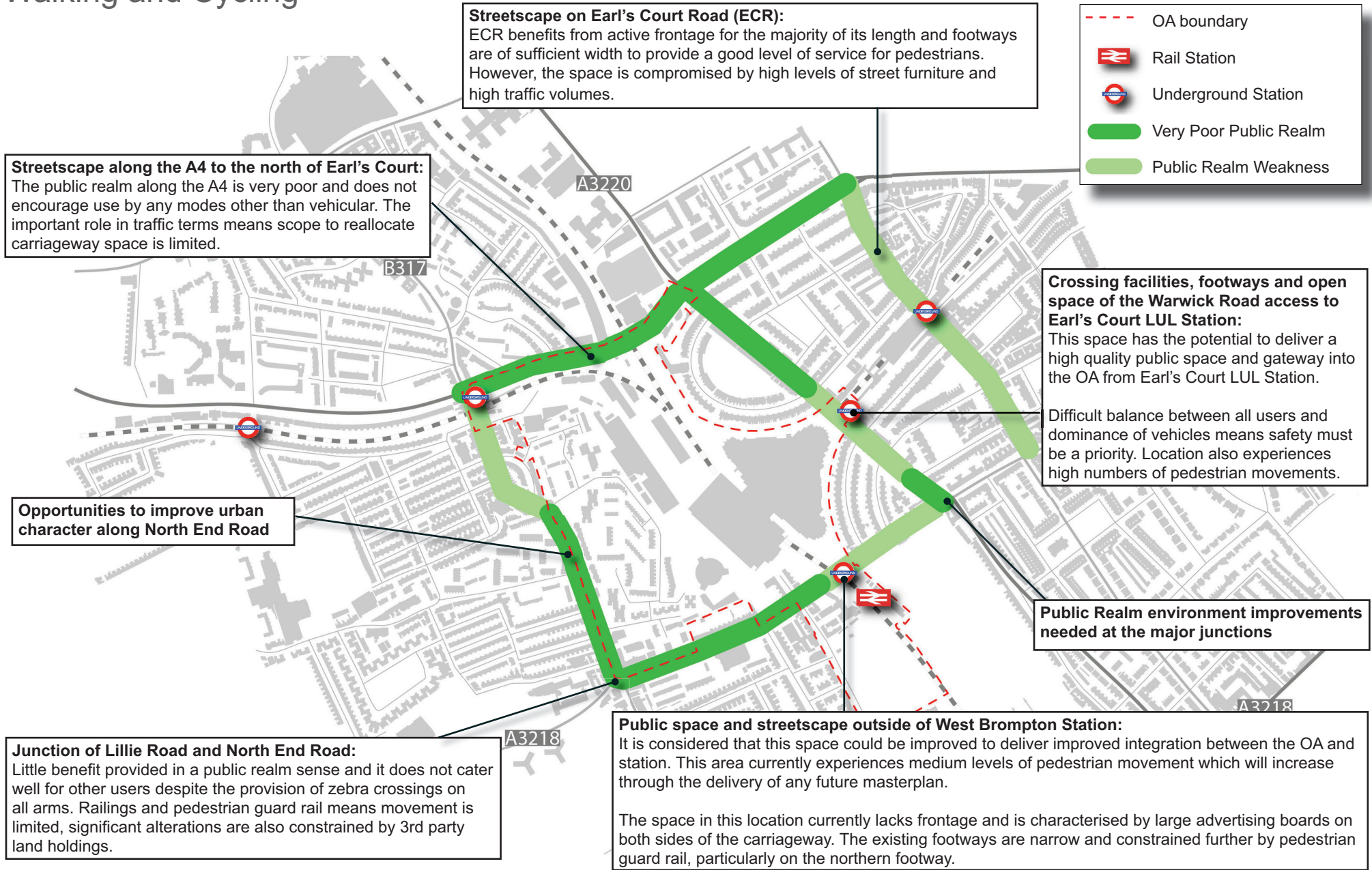


Figure 10.10 Streets surrounding the OA with poor public realm that would need to be resolved (2011)

# Walking and Cycling

## Cycling

- 10•26 If the development proposals are to have an acceptable impact on the surrounding road and public transport networks, cycling should form a key part of the travel choices made by those working and living in the site. Significant investment in cycling facilities, supported by strong Travel Plans, will be vital to achieving higher levels of cycling and are expected to be funded by the development.
- 10•27 The development is forecast to generate around 600 cycle trips in the peak hours. The creation of a new network of cycle friendly streets within the OA will mean that cycling will be safer and more attractive for all. It should be noted that as the local cycling environment is enhanced, cycling will become ever more attractive and therefore these forecasts should be regarded as the minimum that could be expected.

### Key Principle TRN8:

New development should deliver improved onward connections for cyclists into the streets surrounding the OA.

- 10•28 One of the most significant improvements required to accommodate cycle trips is better east-west connectivity. All new streets within the OA should be attractive to cyclists and offer maximum permeability with excellent onward

connections into existing streets. If road closures or one-way streets are proposed within the site these should allow for the passage of cyclists in both directions. Safe and convenient connections north, under the A4 to Warwick Road and south, under Lillie Road, will also need to be investigated. To the east of the site in particular there are several one-way streets that are designed to discourage vehicles from rat running but that also cause significant inconvenience, making cycling less attractive. In order to accommodate the increased demand from development any new development should identify cycle routes based on the likely origin and destination of trips through the area and fund appropriate improvements, such as allowing cycling in both directions in one-way streets and improvements to junctions and crossings, to make those routes as attractive and convenient as possible.

- 10•29 All new streets should be designed to ensure 20mph maximum speeds, which will improve their attractiveness for cyclists and pedestrians by making them safer and reducing traffic noise. More detail on this is set out in the Urban Form Strategy.

### Key Principle TRN9:

New development should deliver increased levels of cycle parking to London Plan and Local Development Plan standards, particularly at key public transport interchanges, and the Mayor's Cycle Hire Scheme should be extended into the OA.

- 10•30 Secure and convenient cycle parking should be provided for residents and workers and sufficient showering and changing facilities should be provided in commercial buildings. Visitor cycle parking on the new streets should be plentiful and located close to areas of demand, such as major entrances to buildings, that benefit from natural surveillance. There is already insufficient cycle parking within the existing streets and at the three Underground stations to meet demand and development will increase this demand. Development should address this problem through additional parking within the OA boundary as well as through a thorough review of opportunities, and funding of new facilities, to increase existing parking levels in the area
- 10•31 The Mayor's Cycle Hire Scheme already extends to the eastern edge of the OA and Phase Three of the Mayor's Cycle Hire Scheme will extend it west, beyond the OA. Docking stations should be provided within the OA with several new docking stations required to meet the likely demand. The cost will be borne by the development.

# Public Transport

## Rail services

### Key Principle TRN10:

New development should deliver physical improvements to all three stations to accommodate the forecast increase in passenger numbers.

### Key Principle TRN11:

Development in the OA should not result in excessive crowding or delay on the London Underground or National Rail and Overground networks, compared to predicted levels in 2031.

10•32 Development will add a significant number of additional trips to the rail networks. The figures below represent all development related trips starting or finishing in the OA by public transport, including buses, although the majority will be made by rail.

Peak Hour	IN	OUT	2-way
AM Development trips	1,500	1,300	2,800
PM Development trips	1,200	1,400	2,600

Table 10.1: Peak hour net additional public transport trips to and from the OA

10•33 The capacity increases set out in paragraph 10.05 are such that this level of additional loading can be accommodated

on the individual lines serving the site. However, due to significant growth in population and employment as well as the demands of development, crowding levels in and around the OA in 2031 are forecast to be at a similar level to today. Crowding on the Wimbledon branch of the District Line is likely to be even higher than it is today and this line will remain the most overcrowded in West London.

10•34 There are a number of currently unfunded proposals that would, if delivered, provide transport benefits to the OA. In particular this includes the provision of longer trains on the London Overground and Southern Services along the West London Line and the proposed Chelsea Hackney Line, which would offer relief to the Wimbledon branch of the District Line. For robustness the Strategic Transport Strategy did not include any additional capacity from these proposals although the principle of each is supported due to the benefit that they would provide to the area.

10•35 A static assessment of the impact of development on all three local stations in 2031 has identified that each would require a significant level of investment to be able to operate at a satisfactory level. All three stations would require an increase in gate line capacity, whilst both West Kensington and particularly West Brompton would require enlarged ticket halls, enhanced stairways and lift access. Detailed requirements for station

improvements are set out below. All of these improvements would need to be funded by development and are subject to London Underground operational agreement.

## Earl's Court Station

### Key Principle TRN12:

New development should provide capacity and environmental improvements to Earl's Court Station, including the reopening of the existing pedestrian tunnel beneath Warwick Road, as part of ensuring the station can accommodate the forecast increase in passenger numbers.

10•36 By 2031 passenger movements into and out of Earl's Court station in the AM and PM peaks will be at least 20% higher than existing movements (2009 figures). Development would add an additional 10% in both peaks.

10•37 The level of additional trips generated by development will put pressure on the existing Warwick Road entrance gate line, which will not be sufficient to cater for demand, and on the eastbound District Line platforms, which will experience an increase in flows along the platform to the Piccadilly Line. The refurbishment and reopening of the existing, but currently unused, pedestrian tunnel under Warwick Road would mitigate these impacts by

# Public Transport

providing a direct link from the OA to the Piccadilly Line avoiding both the eastbound District Line platforms and the Warwick Road station entrance. Alternative improvements to gate line capacity would otherwise have to be identified. The tunnel would need to contain a ticket gate line and will serve as an additional entrance to the station, reducing the burden of additional trips on the current Warwick Road ticket hall and gate line to such an extent that no additional capacity enhancement would be required at the existing gate line. It would also relieve pressure on the eastbound District Line platforms and the stairwells leading down to the Piccadilly Line escalators. There is adequate concourse, platform and staircase capacity to accommodate the predicted levels of demand. Given the listed status of Earl's Court station, changes should be undertaken sensitively and will be subject to Listed Building Consents.

### Key Principle TRN13:

New development should deliver extra capacity at the gate lines, ticket halls and circulation space at West Brompton and West Kensington stations in order to accommodate the development related trips.

## West Kensington Station

10•38 At West Kensington background passenger growth for movements into and out of the station are anticipated to increase by 20-30% to the year 2031 in the AM and PM peaks. A similar scale increase is anticipated to be generated by development. West Kensington station currently has four ticket gates. The predicted background and development growth in demand to 2031 would make five gates necessary and require additional space within the concourse. In order to spread the burden of additional passengers on the existing gate line and concourse, as well as to open up the station to the centre of the OA, a new entrance to the station should be provided at its eastern end. This would remove the requirement for additional gates at the current entrance and better balance pedestrian movement within the station as well as providing a better link into the OA. All staircases and platforms are sufficiently wide to accommodate increased demand.

## West Brompton Station

10•39 By 2031, without development, background passenger growth for movements into and out of West Brompton station are forecast to increase by 50% in the AM peak and 90% in the PM peak. Development will add an additional 30% in both peaks. To accommodate background growth the

number of gates at the station would need to increase from the current three to six. Seven would be required to accommodate development.

10•40 There is insufficient concourse space within the current station arrangement for the volume of passengers forecast, even without development to 2031. Any new development would have to look at a comprehensive reworking of the station to provide more concourse capacity. Options for this station, as well as West Kensington, will need to be assessed to identify how additional space could be released.

10•41 All platforms can adequately accommodate the extra passenger demand forecast above. The existing staircases at the station do not meet London Underground's minimum standards. As West Brompton station is listed any works must be undertaken sensitively and will be subject to Listed Building Consents.

10•42 West Kensington station is locally listed. The physical constraints of both West Kensington and West Brompton stations, especially considering their heritage designations, make these necessary capacity enhancements challenging and any new development should be able to demonstrate clearly how increased capacity will be achieved.

## Public Transport

### Key Principle TRN14:

Step-free access should be provided at West Brompton and West Kensington stations and any new entrance at Earl's Court Station.

- 10•43 To ensure that the OA is developed in a manner that is accessible to all as well as to cater for the significant additional passengers generated by development in the OA, it is a requirement that step-free access is provided to both platforms at West Kensington station and to the southbound District Line platform at West Brompton.
- 10•44 All new station entrances, such as at West Kensington, should be step-free. At Earl's Court station the reopened pedestrian tunnel should be step free at least to the District Line platforms, by providing lifts at the new entrance and extending the current District Line lifts down to the level of the tunnel.

### Key Principle TRN15:

New development should fund platform lengthening to accommodate eight car trains on the West London Line platforms at West Brompton, should investigate creating an additional station entrance and fund its implementation if found feasible following the investigation.

- 10•45 All London Overground and Southern trains consist of four car trains. Network

Rail's London and South East Rail Utilisation Strategy seeks to extend platforms on the West London Line so that they can accommodate eight car trains operated by Southern and six car London Overground trains. This would increase capacity by around 70% and would result in reduced crowding levels on the West London Line which in 2031 with development are otherwise forecast to exceed acceptable levels. Such an increase in capacity would mitigate the impact of development and reduce crowding levels. Though this scheme is currently unfunded, its delivery is a priority for TfL and Network Rail.

- 10•46 This improvement is particularly necessary given the very high levels of crowding experienced on the West London Line and the additional passengers that the development will introduce to the network. The increased line capacity will also increase the number of passengers accessing the station by at least 5% in both peaks. This would further impact upon the station infrastructure at West Brompton and would require at least one additional gate, bringing the total up to eight.
- 10•47 In addition to extending the platforms at West Brompton, creating an additional access to the station would help to reduce the pressure on the ticket hall whilst improving access to the Seagrave Road area of the OA. Development of the OA should provide platform extensions at West Brompton station and should investigate creating an additional station

entrance and fund its implementation if found feasible following the investigation.

### Key Principle TRN16:

New development should deliver significantly enhanced interchange facilities at all three stations.

- 10•48 Interchange facilities need to be improved at all three stations. Currently there are cluttered footways, limited and inconsistent way finding, poor access to bus services at West Brompton and Earl's Court, limited cycle parking and in general a poor pedestrian environment that is dominated by vehicle movements.
- 10•49 The general improvements to the public realm identified as necessary in paragraphs 10.22 to 10.24 will improve the quality of the environment around all three stations. Rationalisation of street furniture will be essential and cycle parking, taxi ranks and bus stops may need to be relocated to the adjoining edges of the site as part of a complete redesign of the spaces so as to provide significantly more space for pedestrian movement without having an adverse impact on access for buses and taxis. Improved crossings and other ways of rebalancing pedestrian needs with those of vehicles will need to be investigated including, for example, the provision of single surface treatments. The design of these will need to be accessible for all and will need to incorporate improved way finding.

# Public Transport

## Bus Services

### Key Principle TRN17:

Additional bus services, routes and stops funded by development will be necessary within and around the OA to accommodate new development trips.

- 10•50 Between now and 2031 local bus demand will change and bus services will need to reflect demand. Development in the OA will need to contribute to additional bus services to ensure that the additional demand generated can be supported on the bus network during peak hours. The effect of highway congestion on bus journey time reliability will need to be considered to ensure that services remain attractive to passengers.
- 10•51 There are a number of locations that have poor bus connectivity to Earl's Court. These include the King's Road, Battersea and Vauxhall, Richmond and south west London. Routes that connect the south of RBKC to the north are currently very limited and new services should help to bridge this gap. Any new routes should help to fill these and other gaps.
- 10•52 There are benefits of both the provision of new and the extension of existing routes to fill the gaps in the network. They will help minimise local capacity problems created by the development as they could

be run through the OA, along a north-south route, which would provide a better range of services for future residents. This is especially important given the poor connections to southbound bus services caused by the splitting of routes on the Earl's Court One Way System. Bus services should be able to travel north-south and east-west but there should be no new connection onto Warwick Road as this link is already well served and impacts on public realm. Any new links here could have significant impacts on the public realm. All changes to bus services as a result of the development will require full mitigation for five years to pay for subsidy of new or additional services until those services become revenue neutral.

- 10•53 Developers will be expected to carry out audits of all the bus stops and associated bus facilities in the area, as part of their Transport Assessment. Applicants will be expected to upgrade these where deficiencies exist to ensure the facilities are fully accessible.
- 10•54 All existing bus stands within the OA should be retained or re-provided on site, and additional space may be required depending on the detailed analysis of bus services undertaken as part of the Transport Assessment submitted in support of development.

## Other Services

### Key Principle TRN18:

Development should include taxi rank and coach parking facilities within the OA

- 10•55 There are currently no TfL Public Carriage Office appointed Taxi Ranks within the OA or its hinterland. Taxi rank and drop off facilities, including for community transport schemes, will need to be provided to support demand from the OA.
- 10•56 There is significant pressure on coach parking facilities in west London. Development should not add to this pressure and therefore sufficient coach parking and drop off facilities will be required within the OA, close to high coach trip generating uses, to meet development demand.

# Road network, car parking and freight

## Road Network

### Key Principle TRN19:

Development traffic cannot be accommodated on the existing road network without significant capacity improvements, which should be clearly identified in development proposals along with appropriate funding mechanisms to ensure improvements are delivered before development demand is introduced.

10•57 Even without development in the OA, traffic levels in the local area are forecast to increase significantly from 2009 to 2031. This is due to both the recent removal of the Western Extension of the Congestion Charging Zone as well as forecast growth in population and employment. The strategic nature of the A4 means it draws significant traffic volumes through the area and is particularly affected by background increases in traffic volumes. In this chapter the '2031 base' refers to forecast traffic levels in 2031 without development. The Strategic Transport Study has assessed the impact of this growth on the road network as well as the additional impacts of OA development. The full extent of the road network that was considered in the local highway modelling is shown in Figure 10.11.

10•58 The strategic transport study estimates that development would increase traffic levels within the OA by around 3% in the AM Peak and 2% in the PM peak. For the local highway network to operate at an acceptable level, this level of growth

would require additional highway capacity improvements and modal shift to walking, cycling or public transport. In particular journey time reliability on the highway network should not be unacceptably impacted by development in the OA.

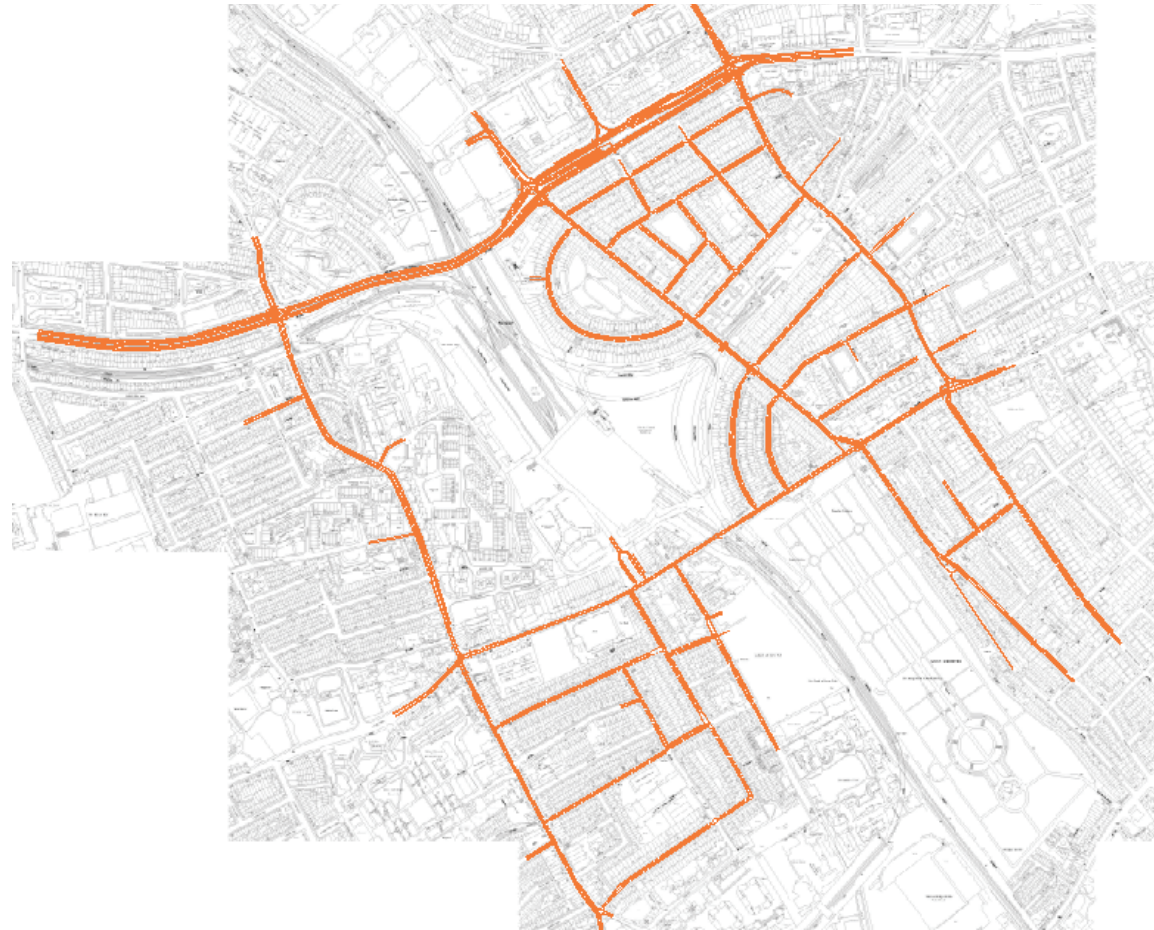


Figure 10.11: The extent of the road network modelled in the transport study



## Road network, car parking and freight

10•59 Development proposals should seek first to mitigate any potentially negative impacts on the highway network by reducing the level of traffic generated rather than through physical interventions to manage traffic. This is considered further in paragraph 10.72. However, in order to ensure a robust assessment was undertaken, the Strategic Transport Study also assessed a number of highway capacity interventions to establish whether they could enable OA development to take place with no reductions in travel demand assumed. The capacity interventions tested included:

- A new north-south route through the site connecting to the A4 and Lillie Road. This would provide access to, and additional road capacity through, the development as well as helping to relieve key routes such as Warwick Road, North End Road, Earl's Court Road and the junctions along the A4 and Lillie Road. A link, or links, such as this are essential to allow development to take place.
- Significant changes to traffic signal phasing to give more 'green light' time to traffic on the roads surrounding the A4. This creates more capacity on the surrounding roads and is possible because the A4 is currently given significant priority.
- Altering the North End Road / Lillie Road junction from a double mini roundabout to a signalised junction, including banning vehicle movements from North End Road

into Lillie Road and vice versa. Any street network within the OA would have to provide alternative turning movements. . This is intended to reduce demand on the junction, creating more capacity for those vehicles still using it.

- Providing a new westbound left turn vehicle movement onto the A4 at the A4/ North End Road junction to run at the same time as the existing right turn eastbound vehicle movement in order to provide additional traffic capacity.
- Alterations to the signal timings at the A4 / Warwick Road junction to accommodate pedestrian crossings in each signal cycle and to remove periods where there are no green signals, which means traffic is given more time to move through the junction.
- Increasing the length of green time at the traffic signals at Old Brompton Road's junctions with Finborough Road and Earl's Court Road, to allow more traffic to pass through the junctions.

10•60 The impact of the capacity improvements set out above is to improve overall network performance, allowing around 15% more traffic to be accommodated. Even with the forecast growth and additional development traffic, average journey times across the local network are comparable to the 2009 base and are significantly improved in comparison to the 2031 base with no capacity improvements.

10•61 However, despite the overall road network performance benefits and the increased capacity primarily brought about by the new link road, this does create some significant variations in performance across the local network. The north-south routes generally experience improved performance and the east-west routes experience decreased performance.

10•62 North End Road, Warwick Road and Earl's Court Road experience reductions in journey time and delay due to the extra road capacity provided by the north-south route and some re-phasing of traffic signal timings. Traffic on these north-south routes moves faster and more smoothly, despite overall increases in traffic flow as some demand flows through the OA. This is demonstrated in Figures 10.12 to 10.15. The figures show a pattern of increasing journey time from the 2009 base to the 2031 base and then a reduction in journey times once the interventions are added. These occur despite the addition of development traffic.

# Road network, car parking and freight

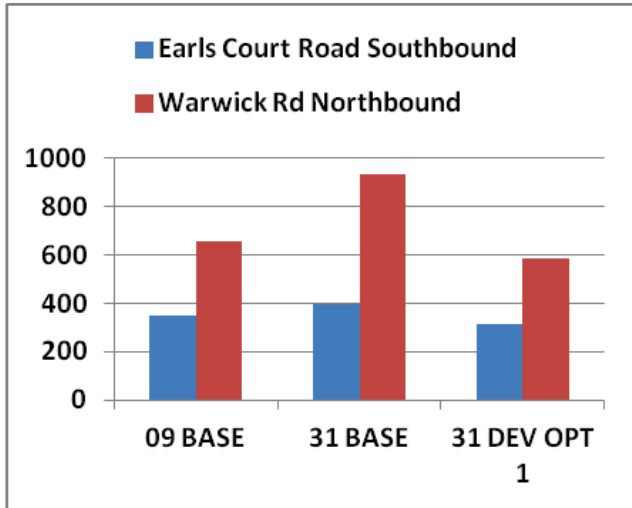


Figure 10.12 Earls Court Road/Warwick Road AM Peak Hour Average Journey Times (measured in seconds)

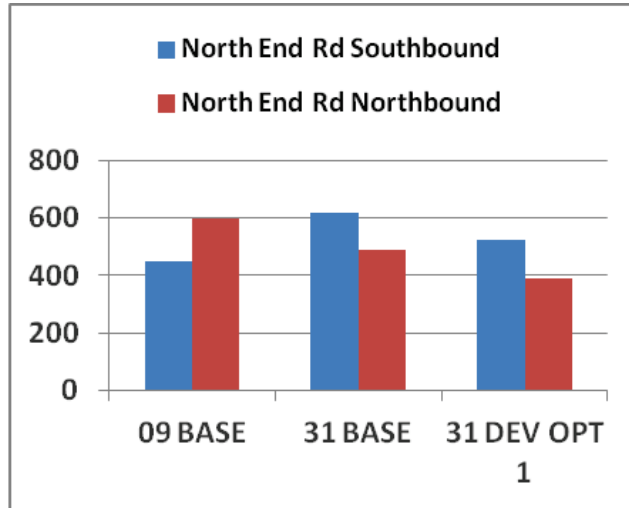


Figure 10.13: North End Road AM Peak Hour Average Journey Times (measured in seconds)

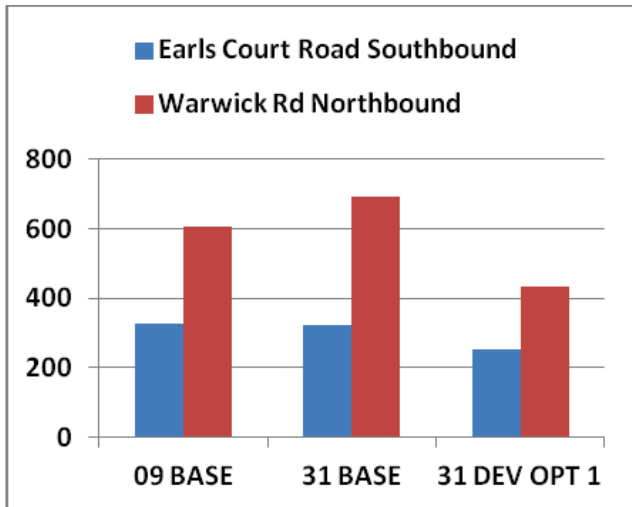


Figure 10.14: Earls Court Road/Warwick Road PM Peak Hour Average Journey Times (measured in seconds)

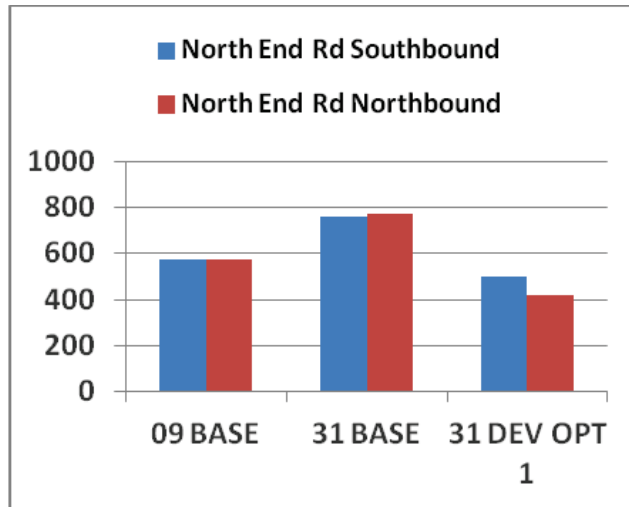


Figure 10.15: North End Road PM Peak Hour Average Journey Times (measured in seconds)

**Key Principle TRN20:**  
Development proposals should include deliverable and funded road network improvements that reduce delays on the A4 to 2012 levels, while not having unacceptable impacts on the surrounding road network.

10•63 In comparison to the impact on the north-south routes, it is clear that development, even with the highway capacity improvements tested in paragraph 10.60, would result in a deterioration of performance in terms of journey time, vehicle delay and queue lengths on the main east-west routes through the area. On the strategically important A4, journey times increase in the AM peak by around 40 seconds westbound and 60 seconds eastbound in comparison to the 2009 base. Eastbound traffic also experiences worsened journey times in comparison to the 2031 base. In the PM peak the overall increases in traffic volume are greater and the journey times therefore increase more significantly. Both directions also see a worsening in comparison to the 2031 base. These delays are due not only to the rebalancing of traffic priority at the junctions as explained above, but also to the introduction of a new junction on the A4.

# Road network, car parking and freight

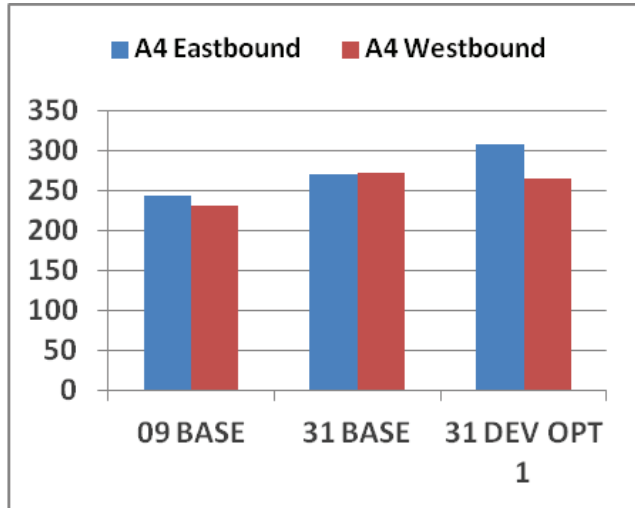


Figure 10.16: A4 Corridor AM Peak Hour Average Journey Times (measured in seconds)

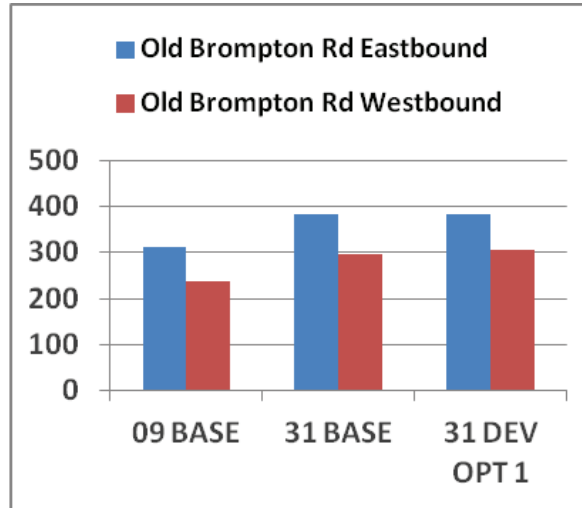


Figure 10.17: Old Brompton AM Peak Hour Average Journey Times (measured in seconds)

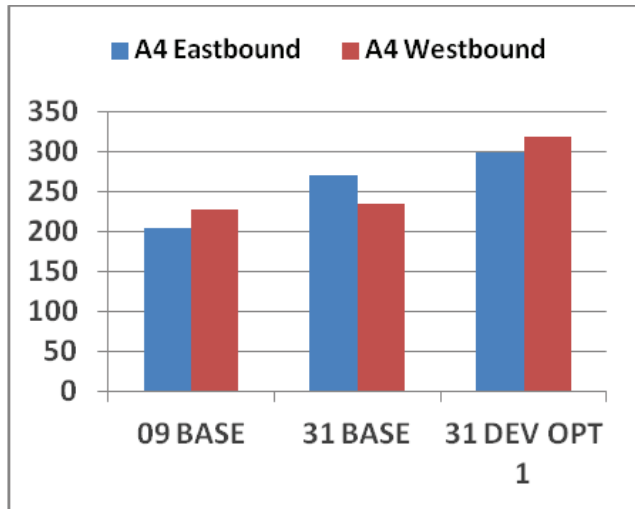


Figure 10.18: A4 Corridor PM Peak Hour Average Journey Times (measured in seconds)

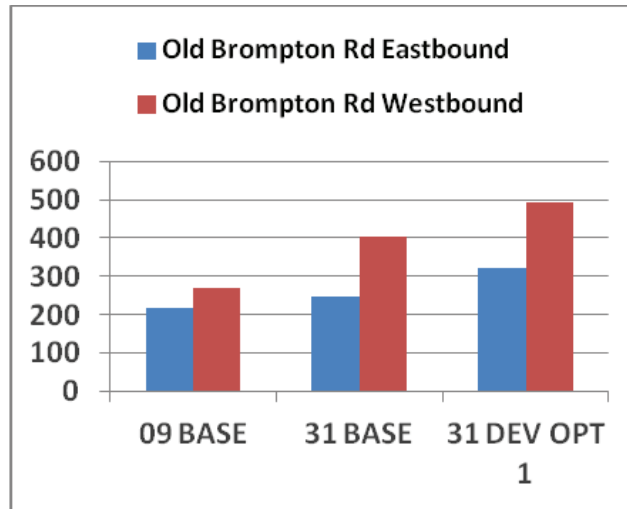


Figure 10.19: Old Brompton PM Peak Hour Average Journey Times (measured in seconds)

10•64 On Old Brompton Road journey times in the AM peak remain broadly unchanged in comparison to the 2031 base, but are increased from the 2009 base. In the PM peak the delays are greater at around 100 seconds eastbound and 210 seconds westbound in comparison to the 2009 base. The increase from the 2031 base is more modest, though still significant, at around 90 seconds in both directions. The greater impact in the PM is due to the larger overall increase in background traffic volume between 2009 and 2031.

10•65 The information outlined above demonstrates that with the interventions tested, development can occur in the OA whilst not impacting on broader network performance, but more locally it would have negative impacts on the A4 and Old Brompton Road. Given that the A4 is a strategic trunk road and part of the Transport for London Road Network (TLRN), such an impact is not acceptable and any development proposals for the OA would need to consider alternative or additional measures to maintain the A4's performance and minimise the impact on Old Brompton Road and would need to demonstrate that this could be achieved through a wide range of mitigation measures within their Transport Assessment. This could include measures such as physical junction improvements, further changes to traffic signal phasing, travel demand management measures and a comprehensive Travel Plan that

## Road network, car parking and freight

will promote a shift in behaviour towards sustainable travel choices. These will all need to be secured and funded by the developer. A detailed assessment of the highway network will need to be undertaken as part of any Transport Assessment.

- 10•66 Improving the capacity of the road network to allow it to accommodate development traffic is essential and some methods of doing that have been set out above after being tested in the Strategic Transport Study. However that assessment did not consider the impact of additional traffic volumes on air quality, residential amenity or on levels of queuing on any new north-south routes within the site. Such impacts are likely to have a negative impact on the environment within and around the OA, will compromise the ease of movement through the site and will create a less pleasant environment for walking and cycling. Given the dual concerns of increased delay on the A4 and the general environmental implications of increased traffic volumes, any development proposals will need to be supported by a comprehensive package of measures to reduce travel demand. This will include parking restraint as set out in paragraph 10.74.

### Key Principle TRN21:

Development should not worsen traffic conditions to unacceptable levels on existing streets and a review of local traffic management arrangements should be undertaken to address this and provide funded mitigations where necessary.

- 10•67 Development has the potential to worsen traffic conditions on existing streets. A review of local traffic management arrangements will be necessary and this should include a funded package of mitigations where necessary.

### The Earl's Court One Way System

#### Key Principle TRN22:

New development should investigate improvements to the Earl's Court One Way System, including to the pedestrian environment and reducing the dominance of vehicles, and should fund a package of measures as identified in the investigation.

- 10•68 This SPD does not seek to achieve significant reductions in traffic on the Earl's Court One Way System via new north-south routes through the OA. An assessment of the potential for using a new north-south route within the site to relieve the Earl's Court One Way System of through traffic, which could allow for two-way operation to be introduced, was undertaken. This found that a north – south route could reduce traffic on Warwick Road by up to 18% and on Earl's Court Road by up to 10%. To achieve this, traffic is diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. Furthermore the level of traffic reduction achieved on the Earl's Court One Way System would not be sufficient to introduce two-way operation.

## Road Network, car parking and freight

This SPD does not therefore seek to achieve significant reductions in traffic on the Earl's Court One Way System via the north-south route through the redevelopment of the OA. However, the alignment of any north-south routes should have regard to RBKC's long term ambition to return Earl's Court One Way System to two way operation.

- 10•69 RBKC will continue to work with TfL to improve the Earl's Court One Way System. This SPD requires significant improvements to the pedestrian environment in and around the Earl's Court One Way System as set out in paragraph 10.23.

### Key Principle TRN23:

All junctions from the OA on to the existing road network and road links across the OA should be assessed to ensure they have no unacceptable impacts on the existing road network in terms of vehicle capacity, road safety and urban design.

- 10•70 New north-south connections through the OA are essential to the development of the OA by providing access to the heart of the site, additional road capacity and relief to existing parallel roads. The connection of a route onto the A4 and connections on Lillie Road should be configured so that the impact on the existing highways is minimised. The exact layout and function of the routes and junctions should be

agreed through the planning application process and must be supported by Road Safety Audits.

- 10•71 An east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, though not for vehicles. A vehicle route from Star Road has been assessed and does not create additional congestion on North End Road. A vehicle access at Warwick Road has the potential to create conflict with pedestrians using Earl's Court station and to compromise the quality of the proposed new public space. If such an access is included in development proposals the road safety and urban design impacts would need to be carefully assessed in a detailed Transport Assessment and it would need to be demonstrated that vehicle access is acceptable.



### Car Parking

#### Key Principle TRN24:

Car parking levels should be minimised in order to restrain car trips, except for parking for car club vehicles, which are encouraged in order to provide an alternative to private car ownership and use.

- 10•72 As set out in paragraph 10.59 development proposals should seek first to mitigate any potentially negative impacts on the highway network by reducing the level of traffic generated rather than through physical interventions to manage traffic. Measures to reduce the volume of car use such as car-free development, the use of car clubs, excellent provision for cyclists and other travel demand management measures will be vital. Clear incentives will need to work with parking restraint in commercial Travel Plans. These will need to work alongside physical improvements to the network.
- 10•73 In general new off-street parking should be minimised and the overall parking requirements for the OA should be considered in the context of total parking, including on- and off-street provision. General public car parks will not be acceptable. In line with the Mayoral priority and borough policies to promote the use of electric vehicles, provision should be made for electric car charging points, both within new buildings and on-street. Some dedicated motorcycle

## Road Network, car parking and freight

parking should be provided. Blue badge parking for residents and visitors should be provided in line with the London Plan and local guidance.

- 10•74 One way of minimising car use is to ensure limited car parking is provided. Given the large scale of the development even relatively constrained parking levels of one car parking space for every 2000m<sup>2</sup> of commercial floorspace and 0.4 spaces per residential unit means 1500 spaces. This level of parking was assumed in the Strategic Transport Study, which as outlined in paragraph 10.65 resulted in some unacceptable impacts on the highway network. In addition further traffic would reduce air quality and general residential amenity. Development in the OA should therefore provide parking at well below 0.4 space per residential unit. Car free development is encouraged with the exception of blue badge and car club parking.

**Key Principle TRN25:**

Development proposals should be supported by an on-street parking strategy.

- 10•75 The likely demand for on-street visitor parking generated by the development has been assessed and is in the order of 200 vehicles. This parking demand is largely from workers within the new commercial uses on site. In order to minimise this, and minimise the impact

of any additional parking demand that remains, development proposals will need to be accompanied by a review of existing controlled parking zones as part of an on-street parking strategy that is compatible with the general objective of reducing traffic. This strategy would consider amendments to existing controlled parking zones and the need for new zones in LBHF. Development would need to fund any necessary alterations.

- 10•76 No new residential units will have eligibility for parking permits issued by RBKC or for existing controlled parking zones in LBHF.

**Freight**

**Key Principle TRN26:**

Development proposals should be supported by substantial measures to minimise the impact of freight, including during the construction period.

- 10•77 An onsite local delivery centre should be investigated as part of the new development. The centre would act as a central collection point for deliveries into the OA that could then be distributed to the local final delivery point by electric vehicle, bicycle or walking. It could also act as a holding point for deliveries for local businesses and residents who are not at home to receive the delivery. This has been proven elsewhere to reduce

deliveries by up to 70%, with resulting savings in emissions and congestion. Such a centre should be able to receive 24 hour deliveries, thereby removing freight vehicles from the highways in peak periods.

- 10•78 Delivery and Servicing Plans and Construction Logistics Plans should be included with any planning applications.
- 10•79 The provision of a freight rail transfer facility for construction materials and the removal of spoil should be investigated as part of the development proposals. If this is not proposed by development the applicant will have to demonstrate why such a facility is not feasible. The facility would reduce the impact of heavy vehicles on the surrounding area and reduce the environmental impact of construction.





# 11 ENERGY STRATEGY

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## Overview

11

### Key Objectives

- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

- 11•1 This chapter sets out requirements to ensure that new development in the OA achieves high environmental standards by reducing carbon dioxide emissions and implementing an energy strategy in accordance with the energy hierarchy, set out in the Mayor's London Plan (2011), of:
1. Be lean (use less energy);
  2. Be clean (supply energy efficiently); and
  3. Be green (use renewable energy).
- 11•2 The final section addresses the requirements of the energy assessment that must accompany any application.

## Context

- 11•3 The Climate Change Act 2008 requires a reduction in carbon dioxide emissions of at least 26% by 2020 and 60% by 2050, against a 1990 baseline. The Government has recently increased this target to 80% by 2050, which will require far more stringent measures to reduce carbon dioxide emissions.
- 11•4 The draft National Planning Policy Framework states that the planning system should aim to “*secure, consistent with the Government's published objectives, radical reductions in greenhouse gas emissions, through the appropriate location and layout of new development, and active support for energy efficiency improvements to existing buildings and the delivery of renewable and low-carbon energy infrastructure*”.
- 11•5 GLA monitoring data shows that in 2008, 43% of carbon dioxide emissions in London were from the workplace, 36% from homes and 21% from transport. Measures to reduce emissions in London are outlined in the Mayor of London's Climate Change Mitigation and Energy Strategy (September 2011). Reducing emissions from workplaces and homes can make a significant reduction in carbon emissions and contribute to meeting London's and the UK's climate mitigation targets.

## Policy Context

- 11•6 **The Mayor's London Plan (2011):**
- 'Climate Change Mitigation' (Policy 5.1);
  - 'Minimising Carbon Dioxide Emissions' (Policy 5.2);
  - 'Sustainable Design and Construction' (Policy 5.3);
  - 'Decentralised Energy Networks' (Policy 5.5);
  - 'Decentralised Energy in Development Proposals' (Policy 5.6);
  - 'Renewable Energy' (Policy 5.7), and
  - 'Overheating and Cooling' (Policy 5.9).
- 11•7 **LBHF's Core Strategy (2011):**
- 'Strategic Site and Housing Regeneration Area – FRA 1'; and
  - 'Reduce Carbon Emissions and Resource Use and adapt to Climate Change Impacts' (Policy CC1).
- 11•8 **RBKC's Core Strategy (2010):**
- 'Earl's Court' (Policy CP10 and associated Vision);
  - 'Earl's Court Exhibition Centre Strategic Site' (Policy CA7); and
  - 'Climate Change' (Policy CE1).

## Using Less Energy

### Key Principle ENE1:

Each phase of development must meet the carbon reduction targets set out in the Mayor's London Plan (2011), with all residential development from 2016 being zero carbon and non-residential development from 2019 being zero carbon.

11•9 There are numerous ways that energy demand from buildings can be reduced (and therefore also reduce carbon dioxide emissions), such as improving insulation, using sustainable building materials, maximising solar gain, natural ventilation, reducing overheating and using energy efficient appliances. The choice of measures depends on many factors, including available technology. Development should not rely on mechanical heating or cooling, such as air conditioning. This document does not specify measures to improve energy efficiency, but requires all new development in the OA to reduce carbon dioxide emissions in accordance with the Mayor's London Plan (2011) targets, as set out in Table 11.1.

Residential buildings:	Improvement on 2010 Building Regulations
2010 - 2013	25 per cent (Code for Sustainable Homes level 4)
2013 - 2016	40 per cent
2016 - 2031	Zero carbon
Non-domestic buildings:	Improvement on 2010 Building Regulations
2010 - 2013	25 per cent
2013 - 2016	40 per cent
2016 – 2019	As per building regulations requirements
2019 - 2031	Zero carbon

Table 11.1: Mayor of London's carbon reduction targets for new residential buildings and non-domestic buildings

11•10 In addition to the Mayor's London Plan (2011) targets, new development in RBKC will be expected to meet the relevant Code for Sustainable Homes or BREEAM standards, as set out in Core Strategy Policy CE1, at the time that detailed planning permission is sought.

## Supplying Energy Efficiently

### Key Principle ENE2:

Redevelopment of the OA must deliver decentralised energy (including associated district heat network) with associated energy centre(s) and infrastructure. The size (capacity), number and location of energy centre(s) must meet the energy needs of each phase of the development, with the potential to meet the needs of the surrounding area.

11•11 Supplying energy efficiently is about reducing reliance on the National Grid and requiring energy to be produced as close to demand as possible. Decentralised energy (DE) means the generation of energy close to the point of demand. This approach enables higher fuel conversion efficiencies and lower electricity distribution losses, particularly losses during the transportation of energy through the National Grid. It also allows heat released during the power generation process to be captured, distributed and used locally, often via a district heating network. District heating networks are fundamental to ensuring these efficiencies are achieved, and will enable low-carbon heat to be distributed and used for space heating and hot water in residential and non-residential buildings in the OA and beyond.

## Supplying Energy Efficiently

- 11•12 The proposed scale of development, high heat demand, proposed mix of land uses and opportunity for laying pipe infrastructure in an integrated manner means development in the OA presents an ideal opportunity to establish DE and associated district heat network. The DE and associated district heat network will not only benefit the OA, but could be extended or connected into DE systems nearby to benefit the surrounding area.
- 11•13 The integration of DE in the OA is supported by a site specific Energy Study (2011) and LBHF's and RBKC's borough-wide heat mapping studies.
- 11•14 Redevelopment of the OA will need to deliver DE and associated district heat network, which must be designed and implemented in accordance with the following criteria:
- a range of fuel types need to be assessed and the reasons for selecting or discounting certain fuel types, including energy from waste (see below), need to be provided;
  - heat and energy will need to be delivered through an Energy Services Company or Multiple Utility Service Company or similar, and dialogue with potential providers needs to commence at an early stage;
  - DE and associated district heat network must be available to supply all buildings on occupation, which may result in one or more energy centres as part of the development or the need for temporary plant;
  - the energy centre(s) must be sufficient in size (capacity) and located centrally to deliver energy to meet the needs of each phase (if several energy centres are provided) or the entire development (if one energy centre is provided) and the surrounding area in the future;
  - pipe infrastructure should be installed in an integrated manner with other service infrastructure and delivered on a phased basis;
  - DE provision and the supporting infrastructure must be future proofed to ensure that the network continues to support a low carbon future;
  - pipe infrastructure must comply with industry standard specifications to facilitate future interconnection of other buildings and/or networks;
  - the location of energy centres must not impact on the residential amenity of new and existing residents, especially considering impacts such as noise, vibration and air pollution; and
  - the type of fuel selected for the DE and associated district heat network should not have unacceptable impacts on air quality and, where possible, renewable fuel sources should be prioritised.

## Renewable Energy

### Key Principle ENE3:

On-site renewable energy will be required to meet any shortfall in achieving the carbon reduction targets. The suitability of renewable energy measures will be assessed having regard to their viability, location, 'whole life' carbon emissions and impacts such as noise, air quality, visual appearance and biodiversity.

11•15 All potential renewable technologies, such as photovoltaic panels, solar thermal, wind, ground and air source heat pumps and biomass fuelled boilers should be assessed for their feasibility in terms of energy generation capacity, 'payback', suitability (building, location and compatibility with DE), 'whole life' carbon emissions and and likely impacts such as noise, air quality and visual appearance. The Government's Feed-in-Tariff and Renewable Heat Incentive provide incentives for renewable energy systems in new developments, which further improve viability by reducing the payback period. The possibility of generating energy from waste using advanced technologies such as anaerobic digestion should also be explored in accordance with RBKC's Core Strategy (2010) Policy CA7g and CE3b as this has the potential to reduce carbon dioxide emissions and provide an integrated waste management solution.

## Energy Assessments

### Key Principle ENE4:

Energy assessments must be submitted with all major planning applications and demonstrate how the targets above are to be met. Energy assessments must also demonstrate the reasons for selecting and discounting certain fuel options and renewable energy technologies.

11•16 The Mayor's London Plan (2011) Policy 5.2C requires "major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy". The energy assessment must show how the energy hierarchy will be implemented to meet the required carbon dioxide emission targets, taking into account the relevant Building Regulations at the time of the planning application. Energy Assessments will need to cover energy demand and carbon dioxide emissions not covered by the Regulations, with the aim of reducing carbon dioxide emissions at each stage of the hierarchy. Energy assessments must also provide detailed information on delivering decentralised energy and renewable energy systems, including all necessary infrastructure (energy centres, heat networks etc). They should also include the relevant Code for Sustainable Homes or BREEAM environmental assessments. Energy assessments must

also demonstrate the reasons for selecting and discounting certain fuel options and renewable energy technologies.

- 11•17 It is expected that DE and the associated district heat network will be a core component in any energy strategy for the OA. The overall reductions in carbon and other emissions that can be achieved will be greater if a renewable fuel source is used. However the use of biomass fuels could increase local emissions of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>), potentially impacting on air quality. The potential emissions from any DE system will need to be assessed as part of an energy assessment submitted with any planning application, and will need to show how any negative impacts will be mitigated.
- 11•18 Energy Assessments will need to set out how the carbon reduction targets will be met within the OA. If the target for achieving zero carbon by 2016 cannot be met on-site, any shortfall will need to be met through 'Allowable Solutions' or financial contributions. Allowable Solutions are a project or scheme which will deliver verifiable carbon savings to meet required on-site targets to achieve zero carbon. However, Allowable Solutions cannot include measures already proposed to achieve the required carbon reduction targets, otherwise known as Carbon Compliance, as this will result in double counting.



# 12 ENVIRONMENTAL STRATEGY

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## Overview

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### Key Objectives

- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

- 12•1 The Government's recently published draft National Planning Policy Statement (July 2011) seeks to *"use the planning system to .... use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy"*. Ensuring that development mitigates and adapts to the impacts of climate change is therefore central to this Environmental Strategy. Climate change mitigation by reducing carbon dioxide emissions is considered in the Energy Strategy. Climate change adaptation

through resilient landscape and effective water management is considered below.

- 12•2 This chapter therefore sets out requirements to ensure that development

in the OA addresses any impact on the environment, including the consideration of construction and demolition, water management, waste, ecology and air and noise/vibration pollution.



Figure 12.1: View looking south, along the railway line from EC2

# Demolition, Excavation and Construction Impacts

## Context

12•3 Given the size and shape of the OA, together with the nature of existing buildings and railway infrastructure, demolition, excavation and construction are likely to be phased over a 20 year period. The impact of these activities, together with associated transport, on existing and new residents will have to be mitigated. These impacts might include:

- Construction traffic, including noise, vibration, emissions, loss of amenity, highway safety, congestion, parking and pedestrian safety;
- Light spill;
- Damage to neighbouring structures, especially heritage and archaeological assets;
- Ground movement;
- Disturbance of unexploded ordnance;
- Creation and exposure of contaminated land leading to pollution of land, air and water;
- Generation of waste;
- Dust and other emissions affecting air quality;
- Energy consumption;
- Noise and vibration; and
- Impacts on ecology.

12•4 Measures to control impacts from noise and vibration, air quality, land contamination, ecology and biodiversity and water conservation are also

considered in the relevant sections of this Environmental Strategy. Mitigating the impact of transport, including the movement of construction waste, is also considered in the Transport Strategy.

## Policy Context

### 12•5 The Mayor's London Plan (2011):

- 'Construction, Excavation and Demolition Waste' (Policy 5.18); and
- 'Sustainable Design and Construction' (Policy 5.3).
- 'Aggregates' (Policy 5.20)

### 12•6 LBHF's Core Strategy (2011):

- 'Waste Management' (Policy CC3); and
- 'Protecting and Enhancing Environmental Quality' (Policy CC4).

### 12•7 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Infrastructure Delivery and Planning Obligations' (Policy C1);
- 'Waste' (Policy CE3);
- 'Air Quality' (Policy CE5); and
- 'Noise and Vibration' (Policy CE6).

12•8 Many of the impacts from demolition, excavation and construction (including air quality, noise, vibration, dust, land contamination and asbestos) are also controlled through other legislation, standards and guidance, such as:

- The control of dust and emissions from construction and demolition; Best Practice Guidance (Mayor of London and London Councils 2006);
- The Construction (Design and Management) Regulations 2007;
- The Control of Asbestos Regulations (2006);
- BS5228: Control of Noise and Vibration on Construction and Open Sites;
- The Site Waste Management Plans Regulation (2008);
- The Definition of Waste: Development Industry Code of Practice, version 2 (CL:AIRE, 2011);
- Control of Pollution Act 1974; and
- Environmental Protection Act 1990.



# Demolition, Excavation and Construction Impacts

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## Mitigating Impacts from Demolition, Excavation and Construction

### Key Principle ENV1:

Demolition and excavation waste, including contaminated waste, should be treated, recycled and reused on-site as much as possible. Where this is not possible, this waste, together with construction materials, should be transported in a sustainable manner, where rail is the preferred transportation method, and disposed of in an approved manner.

- 12•9 The remediation, recycling and reuse of contaminated demolition and excavation waste will need to meet the highest standards of environmental sustainability. Demolition and excavation waste should be remediated, recycled and reused on site. Any on-site demolition, excavation or construction plant must minimise any impacts from noise, vibration, dust and emissions on existing and new residents. An assessment of the environmental impacts of remediation works must be undertaken to determine the most appropriate method.
- 12•10 Any remediation must be in accordance with the seven stage approach outlined in the Land Contamination Strategy, set out under Key Principle ENV14. A 'soil hospital' where soil can be remediated for re-use on-site should be established in the OA. Areas should also be designated for

storing other recycled materials for re-use on-site.

- 12•11 Redevelopment of the OA has the potential to generate many thousands of vehicle movements over a 20 year construction period, especially considering the volume of demolition and excavation waste and construction materials. These vehicle movements are likely to put pressure on the existing traffic network around the OA. Where remediation, recycling and re-use of materials on-site is not feasible, materials should be transported using the most sustainable method. The West London Line runs along the middle of the OA under Earl's Court 2 and is well located to facilitate the transportation of demolition waste and construction materials by rail. In accordance with LBHF Core Strategy Policy CC3 and RBKC Core Strategy Policy CE3d, development proposals should make use of the rail and waterway network for the transportation of construction waste and other waste. The transportation of contaminated materials must also be considered in any construction management plans or site waste management plans produced for the OA.

### Key Principle ENV2:

Construction, demolition and excavation logistics plans must be prepared for every phase of construction and demolition. Access points into the site must be assessed in terms of highway safety, impact on air quality, noise and vibration and also impacts on the new and existing population.

- 12•12 Given the size of the OA and phased approach to construction, it is likely that several vehicle access points will be required during the demolition, excavation and construction period. The number of vehicle access and exit points should be minimised and where required, these should be located where they have the least impact on the traffic network; vehicle, cycle and pedestrian safety; and existing amenity within and surrounding the OA.
- 12•13 Detailed construction, excavation and demolition logistics plans must be submitted to the relevant Local Authority for every phase of development. These will form part of wider construction, excavation and demolition management plans. Construction, excavation and demolition logistics plans must deal with all aspects of construction and demolition vehicle management, including demolition transportation arrangements, delivery schedules, delivery bookings, routing of vehicles and delivery and turning facilities. Swept paths and tracking diagrams will also need to be included in the plans.

## Demolition, Excavation and Construction Impacts

Site access points in predominantly residential areas must be avoided, unless there is no other reasonable alternative in which case any impact on the residential amenity must be minimised. Queuing of construction vehicles on the highway network will not be permitted.

### Key Principle ENV3:

Planning conditions will be used to require Construction Environmental Management Plans (CEMPs) before any demolition, excavation and construction on each phase of development. Developers will need to keep the new and existing population informed of the progress of the demolition and construction and information on all environmental impacts.

12•14 The OA is surrounded by a number of existing noise and air pollution sensitive land uses, including a large number of homes, educational facilities, health facilities, community facilities, shopping and leisure uses. The Council will therefore control the impacts of these at source by requiring CEMPs before any excavation, demolition and construction occurs at each phase.

12•15 The CEMPs must include (although not be restricted to):

- An application for Prior Consent for the Works (Section 61 of the Control of Pollution Act 1974) prepared in

accordance with BS5228;

- Information on the works and the methods by which they are to be carried out;
- The steps proposed to minimise noise resulting from the works;
- The type of plant to be used and its noise characteristics;
- A programme and sequence of works indicating the predicted noise and vibration levels for each activity at specified noise sensitive sites for each phase of the works;
- Where work phases overlap the cumulative noise and vibration impacts shall be predicted;
- Noise monitoring proposals and methodology;
- Measures to inform the existing population on the progress of works and predicted noise levels over a period of time, including site notice boards and weekly resident liaison meetings;
- Traffic and construction logistics, including measures to reduce vehicle movements;
- Safety for highway users, cyclists and pedestrians;
- Minimising lighting and light spill;
- Protection of heritage assets;
- Procedures for dealing with uncovered archaeological sites;
- Site remediation and procedures for dealing with contaminated material;
- Procedures for dealing with unexploded ordnance;

- Measures for the protection of water resources and preventing contaminated runoff;
- Demolition and construction waste management procedures;
- Measures to prevent and control dust and other emissions to air;
- Energy conservation;
- Measures to protection ecological resources;
- Approaches to screening, including the erection of a solid 2.4m high hoarding around the boundary of each phase, with openings for the public to see the progress of the works; and
- Measures for protecting the wider environment, such as noise, air quality and water, from stockpiled contaminated demolition and exaction waste material.

12•16 Local air quality impacts are also likely during the demolition, excavation and construction phases of the development. The CEMP will also need to identify measures to control and monitor air pollution, taking into account the Mayor of London and London Council's guidance document 'The Control of Dust and Emissions from Construction and Demolition'. Due to the extended construction phase and proximity of sensitive receptors, real-time air quality monitoring (including baseline monitoring) will be required, where the authorities will need to agree the location of the monitoring equipment, the site trigger

## Demolition, Excavation and Construction Impacts

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levels and what will happen should an exceedence occur.

- 12•17 There are no designated Archaeological Priority Areas within or adjacent to the OA. However, there is some potential for Roman and earlier archaeology within the OA. The Counter's Creek that ran through the OA also has some topographic, and potentially archaeological, importance. As the OA has archaeological potential, planning conditions will be used to require field evaluations to further understand the archaeological potential of the OA.
- 12•18 Apart from exceptional circumstances (such as work affecting Underground and Railway Lines undertaken during engineering hours or possessions), noisy building works which can be heard at the boundary of the site can only be carried out during the following permitted hours: Monday to Friday (08:00 to 18:00); Saturday (08:00 to 13:00) and at no time on Sundays or Bank Holidays. Any works carried out outside of permitted hours will need to be kept to a minimum, will be strictly controlled by the borough's Environmental Health departments and the surrounding community will need to be given prior notice.
- 12•19 Construction noise and hours of operation are controlled by the borough's environmental health officers through Sections 60 and 61 of the Control of Pollution Act 1974.

- 12•20 The noise level at which construction and demolition becomes significant will be assessed in accordance with Annex E of BS 5228-1: 2009. Significance will be based on absolute facade levels of 70dB LAeqday where existing ambient noise levels, between 08.00 and 18.00, are within the PPG 24 range of noise levels for Noise Exposure Category A and B and 75dB LAeqday where existing ambient noise levels are within the range of noise levels for NEC C and D. The duration criteria of E4 of Annex E will also apply.

### Key Principle ENV4:

Measures will be required at each phase to minimise and control the impact of demolition, excavation and construction on the environment and residents surrounding the OA.

- 12•21 Given the close proximity of new and existing residents to the OA, demolition and construction methods should be selected to minimise their environmental impacts on residents in the surrounding area.
- 12•22 Developers will be required to establish a Community Liaison Group (comprising construction, local authority and community representatives) managed by a Community Liaison Manager.
- 12•23 In accordance with the Site Waste Management Plans Regulations 2008, Site Waste Management Plans (SWMPs) will be required for all developments over £300,000. SWMPs will demonstrate, among other things, how materials will be sourced and used efficiently to minimise waste generation.



# Flood Risk and Sustainable Water Management

## Context

- 12•24 Much of West London, including the OA, is underlain by a shallow aquifer within river terrace deposits along with a deep aquifer within Thanet Sand and Upper Chalk formations. The Environment Agency note that the river terrace deposits underlying the OA constitute a 'Secondary Aquifer' of variable permeability. Records of shallow groundwater levels at the site are unavailable, although groundwater is typically encountered at depths of about 1.5 to 2.0m. A recent report on groundwater levels in the Chalk aquifer (Environment Agency 2007) indicates that the deep aquifer is located about 19m below ground level and the groundwater flows eastwards.
- 12•25 Surface water historically drained into the Counters Creek, located in the general area of the existing railway corridor. Counters Creek was then moved to become a combined sewer located under Warwick Road. Given the substantial level changes across the site, surface water at EC1 and EC2 drains eastwards into the Counters Creek sewer. All other former surface drainage ditches are located in sewers, predominantly flowing westwards across the site towards North End Road.
- 12•26 Sewerage infrastructure within the area is largely Victorian and contained within a combined storm water and foul water sewer system. The Counters Creek sewer is the most significant combined sewer

in the area, serving an area as far north (upstream) as Brent and Camden. In addition to this, an integrated network of sewers and combined sewers traverse the OA. There are issues related to the capacity of this combined sewer in severe storms (see below), which have the potential to affect properties in the area of this combined sewer.

- 12•27 The River Thames is located approximately 1.5km to the south of the OA. Water levels in the Thames in this location are subject to tidal movements, yet fluvial flows are relatively insignificant. Flood defences protect this part of London from the risk of flooding associated with tidal and storm surge events.
- 12•28 A joint Strategic Flood Risk Assessment (SFRA) was carried out for RBKC, published in August 2009 and LBHF, published in June 2010. The SFRA identifies that the majority of the OA in LBHF is located within Flood Zone 3, as defined by the Environment Agency. The area identified as Flood Zone 3 has a high probability of flooding, having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year. A small part of the OA, in the area of North End Road and north of West Brompton station, is identified as Flood Zone 2, having a medium probability of annual flooding. This zone comprises land assessed as

having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year. The remainder of the OA (the exhibition centres) is within Flood Zone 1, having a low probability of annual flooding of less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).

## Policy Context

### 12•29 The Mayor's London Plan (2011):

- 'Climate Change Mitigation' (Policy 5.1),
- 'Urban Greening' (Policy 5.10),
- 'Green Roofs' (Policy 5.12),
- 'Flood Risk Management' (Policy 5.12),
- 'Sustainable Drainage' (Policy 5.13),
- 'Water Quality and Wastewater Infrastructure' (Policy 5.14), and
- 'Water use and Supplies' (Policy 5.15).

### 12•30 LBHF's Core Strategy (2011):

- 'Water and Flooding' (Policy CC2).

### 12•31 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CE1 and associated Vision)
- 'Climate Change' (Policy CE1), and
- 'Flooding' (Policy CE2).

### 12•32 London Draft Water Strategy (2009)

# Flood Risk and Sustainable Water Management

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## Sewer and Surface Water Flooding

### Key Principle ENV5:

Development in the OA will need to ensure that the peak flows entering any combined sewer will either be matched or reduced in comparison to existing peak flows, taking into account the impact of climate change. Developers must consult with and reflect the views of Thames Water and the Environment Agency on the design, capacity, size and construction of the proposed stormwater and sewer network.

- 12•33 The combined sewer network (owned and operated by Thames Water) and in particular the Counters Creek sewer, poses the greatest risk of flooding in the OA. This is mainly due to the vast catchment area and the limited capacity of the sewer, which has the potential to back up during extreme rainfall events. This has occurred on several occasions, most recently in July 2007, when several properties along Counters Creek in LBHF and RBKC reported localised flooding.
- 12•34 Climate change, and in particular the possible increase in storms, has the potential to increase flood risk. The impacts of climate change therefore need to be taken into account when considering the capacity of, and flows entering, the combined sewer network.
- 12•35 Thames Water is preparing a bid to

Ofwat for funding for the Counters Creek Sewer Flood Alleviation Scheme which will increase the capacity of the sewer network. Subject to securing funding from Ofwat and any necessary planning permissions and consents, construction could commence in 2014 with completion likely in 2018. However, the scheme is not yet confirmed. Regardless of the outcome, development must still meet the principles set out above. Thames Water is working with the developer to assess the impact of the development on surface water and foul water drainage.

- 12•36 Where possible, gravity should be used to direct flows into the combined sewer network. If pumps are proposed, these should be carefully maintained to guarantee all year round use, so as to not increase flood risk, and sustainably powered to minimise carbon emissions.

### Flood Risk Assessment, Mitigation and Adaptation

#### Key Principle ENV6:

A Flood Risk Assessment (FRA), including an Exception Test, must be submitted with any major planning applications in the OA as required in accordance with Planning Policy Statement 25.

- 12•37 In accordance with the Government's Planning Policy Statement 25, RBKC and LBHF have both produced

'Sequential Tests', which seek to prioritise development in Flood Zone 1, then Flood Zone 2 and lastly Flood Zone 3. As 60% of LBHF lies within Flood Zones 2 & 3, LBHF's Core Strategy (2011) states that it would be unreasonable to restrict development to the remaining 40%. Development proposals within the RBKC portion of the OA will need to have regard to findings and recommendations contained within the Council's Sequential Test for the Earl's Court Strategic Site allocation, June 2009.

- 12•38 Planning Policy Statement 25 requires planning applications for development proposals of 1 hectare or greater in Flood Zone 1 and all proposals for new development located in Flood Zone 2 and 3 to be accompanied by a FRA. As the OA in LBHF is located with Flood Zone 2 and 3 and the OA in RBKC is larger than 1 hectare a site specific FRA will be required to accompany applications for comprehensive redevelopment. FRAs will also be required for detailed planning applications at each phase. The FRA must identify all potential sources of flood risk within the OA and consider approaches to mitigate any risks identified. The FRA must consider the cumulative impacts of different phases, any impacts on surrounding areas, such as upstream of sewer infrastructure, and the impacts of climate change. The Environment Agency and Thames Water must be consulted on future planning applications

# Flood Risk and Sustainable Water Management

in the OA, including each FRA, and their comments will be taken into account when determining planning applications. Furthermore, as much of the OA is located within Flood Zone 3 and contains land uses classified as “more vulnerable” an exception test is required as part of the planning application.

## Key Principle ENV7:

Self contained basement dwellings will not be permitted in Flood Risk Zone 3. All habitable basement rooms within the OA must be equipped with pumps and non-return valves, and have suitable alternative means of escape.

12•39 In accordance with the Government’s Planning Policy Statement 25, self contained basement dwellings will not be permitted in Flood Zones 3. Decking over the railway and TfL depot will change the ‘ground level’, so development in the OA will need to ensure that any changes in ground level will not increase the risk of flooding, especially where new ‘basement’ dwellings could be created. The Environment Agency does not object in principle to residential units located 600mm above the statutory flood level provided suitable means of escape are provided and non-return valves are installed.

## Water Conservation

### Key Principle ENV8:

Residential development should be designed to limit mains water consumption to 105 litres per person per day or less.

12•40 The London Water Strategy promotes a simple hierarchy for strategic water management of ‘lose less’, ‘use less’ and ‘reclaim more’. The London Plan Policy 5.15B sets out the Mayor’s policy for water consumption, requiring development to minimise the use of mains water by incorporating water saving measures and equipment and designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day. In addition to this, RBKC Core Strategy (2010) Policy CE1 requires development to meet certain Code for Sustainable Homes and BREEAM targets, which include targets for water consumption.

12•41 Given the presence of an aquifer beneath the OA, borehole abstraction should be investigated as a possible source of potable water. Rainwater harvesting should also be integral to building design. Rainwater harvesting measures can range from simple water butts to more complex systems linking buildings. Rainwater can be used for all non-drinkable uses, such as garden watering,

car washing, toilet flushing and clothes washing. Rainwater harvesting must consider the cost and possible carbon emissions from pumping and filtration associated with capture compared with mains water. Gravity fed rainwater harvesting systems are preferred to pumped systems.

12•42 To ensure water efficiency, all water using appliances installed in buildings in the OA (such as washing machines, dishwashers and shower heads) should be water efficient and industry coded as such. Water butts, aerated and spray taps, low-flow and dual flush toilets, vacuum drainage systems and waterless urinals should also be considered. This will be secured through condition or s.106 agreement as appropriate.

## Sustainable Urban Drainage Systems (SUDS)

### Key Principle ENV9:

Development in the OA should aim to reduce the volume of the undeveloped site’s surface water run-off at peak times to Greenfield run-off rates or better. Where possible development should aim to achieve 100% attenuation or at the very least 50% attenuation on site, ensuring that surface water run-off is managed as close to its source as possible in accordance with the drainage hierarchy in the London Plan (Policy 5.13). SUDs must be incorporated into the design of buildings and public realm.

## Flood Risk and Sustainable Water Management

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- 12•43 In addition to floodrisk mitigation measures identified through the FRA and Sequential Test, development must incorporate SUDs to reduce the volume and rate of surface water runoff entering the storm water network.
- 12•44 SUDs, either integrated into open space or buildings, are used to a) ease the rate of surface water entering the stormwater system during intense periods of rain, b) allow surface water to be absorbed into the ground as near to where it falls as possible and c) generally reduce the risk of surface water flooding. SUDs can also improve the quality of stormwater run-off, promote biodiversity and provide amenity to open space.
- 12•45 Large parts of the OA consist of impermeable surfaces and hard standing which contribute to surface water flooding. The impermeable surfaces and hard standing are predominantly found in the area of Earl's Court 1 and 2, where decking is used to support the structure above the railway lines. There is also hard standing around the Empress State Building and the TfL Lillie Road Depot. Redevelopment of the OA must maximise sustainable urban drainage and where decking, hard standing or impermeable surfaces are required, surface water should be managed as close to its origin as possible and drained to areas of the OA where SUDs are provided.
- 12•46 There are numerous SUDs measures that could be implemented across the OA,

including:

- Integrating green space, soft landscaping and planting, which are able to cope with extreme weather conditions, to reduce the impact of overheating, provide shade and attenuate stormwater flows;
  - permeable and semi permeable surface materials (including materials used for pavements, driveways and highway construction);
  - vegetated swales, basins, drainage channels, infiltration trenches and filter drains, retention ponds, wetlands and rain gardens;
  - public and private gardens, green corridors and site wide native planting, including shrubs and trees;
  - green and brown roofs and walls integrated into building design; and
  - attenuation tanks and permeable soak aways.
- 12•47 Green and brown roofs on buildings require an impermeable membrane to ensure that water does not leak through the roof structure. This membrane then supports a layer of substrate and native vegetation. In addition to absorbing rainfall and dissipating stormwater runoff, green and brown roofs and green walls can sometimes improve the thermal performance of buildings and contribute to residential amenity. It is important that green and brown roofs are well maintained by those who manage the building.



Figure 12.2: Photograph of landscaped drainage channels



Figure 12.3: Photograph of swales at Upton



Figure 12.4: Photograph of a green roof



Figure 12.5: Photograph of Xeriscaping

# Waste Management

## Context

12•48 The amount of household waste generated in LBHF has decreased by 18 percent since 2005, whilst the recycling rate has increased from 21 percent to 27 percent. In RBKC, household waste generation (by weight) has decreased by 7 percent since 2005 and the recycling rate has increased from 20 percent to 31 percent. The recycling rates in LBHF and RBKC are higher than many other London Boroughs and greater levels of recycling are anticipated in the medium to long term, as assessed against the Mayor's London Plan (2011) targets.

12•49 Both boroughs' waste transfer, disposal, recycling and processing services are currently provided by the Western Riverside Waste Authority (WRWA). These arrangements will continue due to contractual obligations until 2025. Municipal waste from within the WRWA area that previously went to landfill now goes to a new river fed energy-from-waste incinerator at Belvedere, Bexley. Co-mingled dry recycled material is now processed within the WRWA area, following the recent opening of a new facility at Smugglers Way, Wandsworth.

12•50 The Waste Management Strategy for London (2010) sets the following targets:

- achieve zero municipal waste direct to landfill by 2025;
- reduce the amount of household waste by 20 percent by 2031;
- recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031; and
- reuse and recycle 95 per cent of construction, excavation and demolition waste by 2020.

12•51 There are currently no dedicated waste or recycling handling facilities within the OA. All commercial waste generated by The Earl's Court Exhibition Centres is currently collected by a private contractor and disposed of under separate arrangements.

## Policy Context

12•52 **The Mayor's London Plan (2011):**

- 'Waste Self-Sufficiency' (Policy 5.16), and
- 'Waste Capacity' (Policy 5.17).

12•53 **LBHF's Core Strategy (2011):**

- 'Waste Management (Policy CC3).

12•54 **RBKC's Core Strategy (2010):**

- 'Earl's Court' (Policy CP10 and associated Vision),
- 'Earl's Court Exhibition Centre Strategic Site' (Policy CA7), and
- 'Waste' (Policy CE3).

12•55 **Waste Strategy for England (2007)**

12•56 **Waste Management Strategy for London (2010)**



# Waste Management

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## Waste Collection and Management Systems

### Key Principle ENV10:

Redevelopment of the OA must deliver sustainable waste collection and management systems, taking into account industry best practice.

- 12•57 To deliver sustainable waste collection and management systems, development in the OA must accord with LBHF's 'Storage of Refuse and Recyclables' SPD and RBKC's 'Wastescape Design Guide' and incorporate the following principles:
- Maximise recycling and waste diversion at source (e.g. in kitchens);
  - Integrate with existing waste collection systems and infrastructure in LBHF and RBKC;
  - Be cost effective;
  - Accommodate green waste diversion and composting;
  - Provide sufficient size and easily accessible refuse and recycling storage areas;
  - Minimise refuse vehicle movements;
  - Ensure that the highway network can accommodate refuse vehicles;
  - Ensure that on-street street parking does not obstruct refuse vehicles; and
  - Provide easily accessible bulky waste collection areas.

- 12•58 The authorities consider that a combination of standard bin stores and a chute-based suction system (Envac) would be most suited to development in the OA.
- 12•59 In accordance with the Site Waste Management Plans Regulations 2008, Site Waste Management Plans must be prepared and implemented for development in the OA. The Site Waste Management Plan must be prepared in accordance with Defra Guidance and will be secured via any Section 106 agreement.

## Centralised Waste Facility

### Key Principle ENV11:

At least one centralised waste management facility must be provided in the OA.

- 12•60 At least one centralised, on-site, waste management facility must be provided in the OA to manage the collection, sorting and storage of waste (including bulky items). This facility must be large enough to accommodate waste generated from the development at each phase and contribute to meeting the borough's waste apportionment targets. This facility should not impact on new or existing residential amenity, in terms of air quality and noise. Location, mitigation measures and/or a suitable buffer will therefore be required between any waste facility and sensitive land uses, such as residential dwellings. This facility will also be subject to the requirements in the Air Quality and Noise / Vibration sections of this Environmental Strategy. A centralised facility would ideally be located underground on the periphery of the OA and have good vehicular access to the strategic road network. Development proposals should also explore and where deemed appropriate use the waste facility to generate energy from waste.

# Waste Management

## Encouraging Waste Minimisation, Reuse and Recycling

### Key Principle ENV12:

In addition to regulatory approaches, redevelopment in the OA should contribute towards reducing, reusing and recycling waste through non-regulatory and education based approaches.

- 12•61 In addition to regulated waste collection and management systems there are numerous non-regulatory and education based approaches to reduce, reuse and recycle waste, that should be implemented in the OA.
- 12•62 Cupboards with integrated waste sorting facilities should be installed in every kitchen to encourage the separation of waste from recyclables. All kitchens, and other points of waste disposal, should also provide information on what can and cannot be recycled. Information should also be provided on waste reduction, such as buying loose fruit and vegetables to minimise packaging; using reusable bags and lunch boxes to reduce the use of plastic bags; buying goods in bulk, such as washing up liquid; insisting on 'no junkmail'; using taps or home filtered water rather than bottled water; buying products from recycled materials and composting garden waste.

- 12•63 Waste minimisation measures should be promoted by on-site waste management arrangements and approaches to changing behaviour in consultation with LBHF and RBKC waste and recycling officers.

## Composting

### Key Principle ENV13:

Redevelopment of the OA should provide green waste and kitchen waste collection to support a community led composting scheme.

- 12•64 Composting can be undertaken on a small scale domestic basis or community wide composting could be delivered through green and kitchen waste collection and disposal. Developers in the OA should set up a community led composting scheme, taking into account the guidance of the Community Composting Network (CCN).



# Land Contamination and Remediation

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## Context

- 12•65 A rich history of industrial land uses and practices has resulted in the potential contamination of land within the OA. These land uses include a former coal and goods depot, railway sidings, a brewery, laundries, an in-filled canal and some works and factories that included chemical and fuel storage. Adjacent to the OA, potentially contaminative uses include a former brickfield (in-filled with unknown material), a rifle range and a hospital. Current potentially contaminative uses include the TfL depot, laundries, dry cleaners and a mannequin manufacturer. Nearby off-site potential sources include a petrol station.
- 12•66 The portion of the OA within LBHF and some parts within RBKC are therefore identified as potentially contaminated (under Part IIA of the Environmental Protection Act 1990) due to the probable risks associated with the past and present uses of the site.
- 12•67 Land within the OA must be suitable for use prior to development and all potential contamination must be identified, assessed and remediation must be implemented. Remediation should be sustainable and not adversely impact the environment.

## Policy Context

- 12•68 **The Mayor's London Plan (2011):**
- 'Contaminated Land' (Policy 5.21).
- 12•69 **LBHF's Core Strategy (2011):**
- 'Protecting and Enhancing Environmental Quality' (Policy CC4).
- 12•70 **RBKC's Core Strategy (2010):**
- 'Earl's Court' (Policy CP10 and associated Vision).
- 12•71 **RBKC's Unitary Development Plan (2002) Saved Policies:**
- 'Require additional information for developments on contaminated land' (Policy PU3), and
  - 'Ensure appropriate protection for future users of contaminated land' (Policy PU4).
- 12•72 **Guide to help developers meet planning requirements, 2004** (various boroughs including RBKC but excluding LBHF), which is to be updated in 2011.
- 12•73 **LBHF Draft Guidance for Developers of Land where Contaminated Land may be an Issue (2011)**
- 12•74 Land contamination is also controlled through other legislation, such as:
- Part IIA of the Environmental Protection Act 1990;
  - Contaminated Land (England)

Regulations 2006;

- Defra Circular 01/2006 Contaminated Land Statutory Guidance;
  - Environmental Permitting (England and Wales) Regulations 2010;
  - The Hazardous Waste (England and Wales) Regulations 2005;
  - The Environmental Damage (Prevention and Remediation) Regulations 2009; and
  - Building Regulations 1991 (Building Act 1984).
- 12•75 **Guidance also exists to aid developers, environmental consultants and local authorities in addressing potentially contaminated land, including:**
- CLR 11: Model procedures for the management of Contaminated Land (Defra, 2004);
  - BS10175, The Investigation of Potentially Contaminated Land Sites;
  - The Definition of Waste: Development Industry Code of Practice, version 2 (CL:AIRE, 2011);
  - Assessing risks posed by hazardous ground gases to buildings (CIRIA 665, 2007); and
  - The VOCs Handbook. Investigating, assessing and managing risks from inhalation of Volatile Organic Compounds (VOCs) at land affected by contamination (Ciria 682, 2009).

# Land Contamination and Remediation

## Assessment and Sustainable Remediation

### Key Principle ENV14:

Construction in the OA shall only begin once any potential land contamination has been identified, assessed and remediated in accordance with the stages below.

12•76 Potentially contaminated land should be identified, assessed and remediated in accordance with the following seven stages:

- Preliminary Risk Assessment: This assessment should comprise of a desk top study which includes details of past and present uses at the site and the surrounding area to identify any potential sources of contamination. This should include a search of Council planning records. Any pollutants associated with these sources should be identified along with their potential related risks. It should then be determined what sensitive receptors are likely to be present at the development site such as humans, ecological receptors or building materials. Any pathway from potential on-site sources to off site sensitive receptors should also be identified. A conceptual site model should be produced to demonstrate where any pathway connects any of these sources to the sensitive receptors. This Source-Pathway-Receptor connection is known as a pollutant linkage.

- Site Investigation Scheme: This scheme is based upon the preliminary risk assessment and should set out how the site investigation will be carried out, how the sources of pollution identified in the conceptual site model will be targeted and determine the existence of the pathway to the identified receptors.
- Site Investigation: This investigation should follow the approved scheme and be undertaken using current guidance and methods. The results of the investigation must be clearly presented, compared against recognised and approved standards and interpreted so that it is clear for both Councils to see where remediation action is required.
- Risk Assessment: The results of the site investigation should be assessed to determine the degree and nature of any contamination on the site and the risks posed by any contamination to human health, controlled waters and the wider environment. The conceptual site model should be revised with the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages.
- Remediation Strategy: A detailed method statement for any required remediation works identified through the risk assessment should be produced with the aim of breaking any pollutant linkages.
- Verification: A report should be produced

which validates and verifies that all of the works outlined in the remediation strategy have been undertaken as agreed. This would include details such as analytical results confirming successful in-situ remediation or importation or clean top-soil cover, the proper placement of gas membranes and waste transfer tickets demonstrating a duty of care in handling any off site transfer of excavated soil.

- On-going monitoring: If during development, contamination not previously identified is found to be present at the site, the Council should be immediately informed and no further development (unless agreed in writing by the Council) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is agreed in writing by the Council. There may also be situations in which confirmation that remediation has been successfully achieved or abated is necessary and monitoring past the completion of development is required. The scope of any monitoring should be agreed in writing by the Council. These works should then be reported to and agreed in writing by the Council, when it is demonstrated that no residual adverse risks exist.

## Land Contamination and Remediation

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**Key Principle ENV15:**

The remediation strategy will need to demonstrate that measures with the least environmental impact have been selected, especially considering transport and on-site treatment.

12•77 During the investigation, remediation, validation and on-going monitoring of potentially contaminated land, works with the least environmental impact should be selected. Environmental impacts should include carbon emissions, transportation of waste, air pollution, water pollution and noise and vibration from the works. In particular, an assessment of the environmental impacts of remediation works must be undertaken to determine the most appropriate method. The removal of contaminated land off-site should be considered the last option after more sustainable methods such as in-situ and on-site remediation. The phased approach to this development provides an opportunity to locate stockpiles of material for re-use on-site, near the soil hospitals where this material would be treated. Any in-situ remediation which may alter the hydrogeology of the site should be assessed to ensure it does not adversely impact surface water drainage and groundwater flow in the area.



# Air Quality

## Context

12•78 LBHF and RBKC are both designated as Air Quality Management Areas (AQMA). This designation is due to levels of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) in both boroughs that breach the Government's air quality objectives. Vehicles using Talgarth Road/ West Cromwell Road (A4), Warwick Road, North End Road and Lillie Road are one of the main sources of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions affecting the OA. Buildings are also responsible for a significant amount of local emissions, especially NO<sub>2</sub> from gas boilers. Figures 12.6 and 12.7 show the predicted annual mean levels of PM<sub>10</sub> and NO<sub>2</sub> in 2008 respectively, using data from the London Atmospheric Emissions Inventory 2008 (<http://data.london.gov.uk/laei-2008>). Figure 12.8 shows the number of days per year (in 2010) that PM<sub>10</sub> exceeded the Government's objectives.

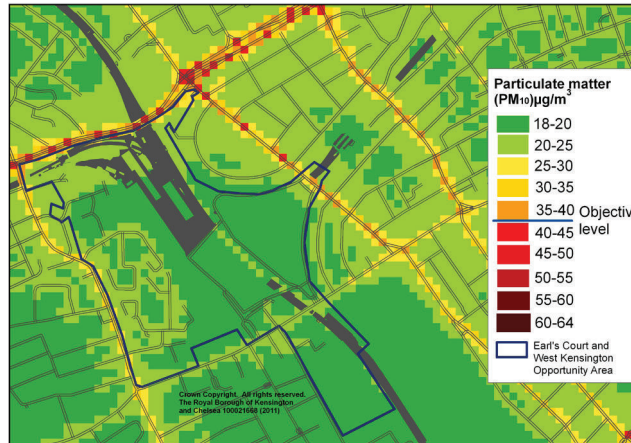


Figure 12.6 Predicted annual mean levels of PM<sub>10</sub> for 2008 with the Government objective level shown as a blue line

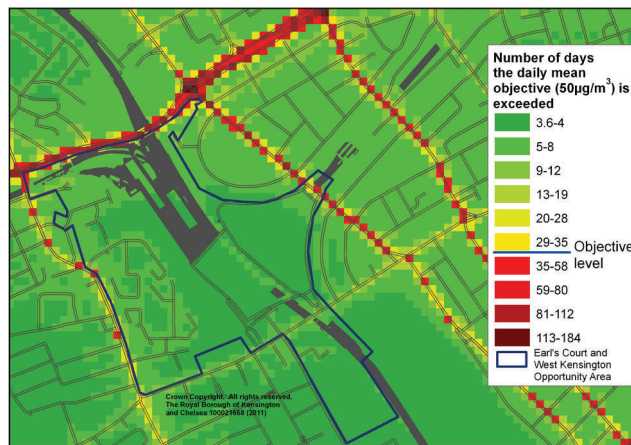


Figure 12.8 Predicted number of days, exceeding the PM<sub>10</sub> Government objective level, in 2008 with the objective shown as a blue line

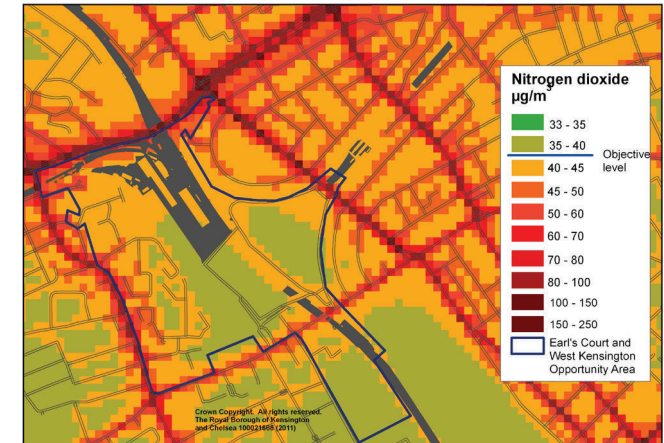


Figure 12.7 Predicted annual mean levels of NO<sub>2</sub> for 2008 with the Government objective level shown as a blue line

## Policy Context

### 12•79 The Mayor's London Plan (2011):

- 'Improving Air Quality' (Policy 7.14)

### 12•80 LBHF's Core Strategy (2011):

- 'Protecting and Enhancing Environmental Quality' Policy CC4.

### 12•81 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision)
- 'Air Quality' (Policy CE5).

### 12•82 RBKC Air Quality SPD (2009) and Air Quality Management Progress Report (updated annually)

# Air Quality

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## Improving Air Quality

### Key Principle ENV16:

Redevelopment in the OA should be at least air quality neutral against existing levels and should include mitigation measures to improve air quality in accordance with the Mayor's Air Quality Strategy and local air quality action plans.

12•83 A Low Emission Strategy (LES), incorporating an air quality assessment which compares current and future emissions, will be required to assess the current and future air quality within the OA. The LES also needs to consider the potential air quality impacts, including health impacts on residents and other sensitive receptors, following each phase of development in the OA.

12•84 The LES will need to propose measures to ensure that development is air quality neutral at each phase and where appropriate, set out measures to improve air quality (see possible mitigation measures below) in accordance with the Mayor of London's Air Quality Strategy and local air quality action plans. It may also be necessary to implement design solutions to minimise exposure to poor air quality, such as locating less sensitive uses in areas of poor air quality and/ or incorporating appropriate mitigation measures.

12•85 The adoption of energy efficient building design and integration of low / zero carbon heat technologies (such as Combined Heat and Power (CHP) systems, heat networks, photovoltaics, heat pumps etc) can help to reduce NO<sub>2</sub> emissions from domestic and commercial gas boilers. However, some renewable technologies, such as biofuelled CHP plants and biomass energy systems, can potentially increase local emissions of NO<sub>2</sub> and PM<sub>10</sub>, possibly impacting on air quality. The LES will therefore need to demonstrate how the impacts from any proposed installations are mitigated.

12•86 In addition to the Mayor of London's Air Quality Strategy (2010), both boroughs have air quality action plans setting out measures to reduce emissions, improve local air quality and work towards meeting Government objectives. There are a number of mitigation measures, both regulatory and non-regulatory, that can help to reduce the impact of development on air quality. The LES will need to consider the feasibility of each of the following (but not limited to) mitigation measures;

- locate non-residential and/or mixed use buildings along the Talgarth Road/ West Cromwell Road (A4) and ensure residential buildings along heavily trafficked roads are recessed or incorporate further mitigation measures listed below;

- incorporate significant tree planting, planted areas or other green landscaping as barriers along major roads;
- limit emissions from heating and cooling of buildings by using passive heating and cooling designs and the use of low emission low/zero carbon technologies and where necessary use abatement technology;
- limit the ratio of off-street car parking to new dwellings in accordance with the Transport and Accessibility Strategy (Chapter 10) thus encouraging a low level of car ownership;
- require 20% of car parking spaces to provide electric vehicle charging facilities to encourage the uptake and use of these vehicles;
- implement 20mph zones and shared surface treatments on certain roads to reduce through traffic; and
- encourage walking and cycling by improving connectivity through the OA, improving access to public transport and requiring a green travel plan.

# Noise and Vibration

## Context

12•87 The main sources of noise and vibration in the OA are from road traffic, London Underground trains, West London Line trains (including freight trains) and aircraft on the Heathrow flight paths. The use of the TfL Lillie Road Depot for emergency track repairs and events at the Exhibition Centres also causes noise and vibration although these two sources of noise will be discontinued with redevelopment of the OA.

## Policy Context

### 12•88 The Mayor's London Plan (2011):

- 'Reducing Noise and Enhancing Soundscapes' (Policy 7.15).

### 12•89 LBHF's Core Strategy (2011):

- 'Protecting and Enhancing Environmental Quality' (Policy CC4).

### 12•90 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision); and
- 'Noise and Vibration' (Policy CE60).

### 12•91 Sounder City – The Mayors Ambient Noise Strategy

### 12•92 RBKC Noise SPD (2009)

12•93 Noise and vibration is generally controlled through environmental protection legislation and British Standard Codes of Practice, including:

- World Health Organisation: Guidelines for Community Noise (1999);
- BS 8233:1999 (Sound Insulation and Noise Reduction for Buildings – Code of Practice);
- BRE/ Ciri 'Sound Control For Homes'
- BS 4142: 1997 - Rating industrial noise affecting mixed residential and industrial areas;
- BS 6472:2008 'Guide to Evaluation of human exposure to vibration in buildings (1Hz to 80Hz)';
- Building Bulletin 93 (BB93): Acoustic design of schools;
- Approved Document E - Resistance to the passage of sound;
- Control of Pollution Act 1974; and
- BS Code of Practice BS 5228 for noise vibration control on construction sites.





# Noise and Vibration

## Mitigating Noise and Vibration

### Key Principle ENV17:

Development must be designed and constructed to mitigate and adequately control noise and vibration. Noise and vibration sensitive land uses must also be located away from sources of noise and vibration, unless mitigation measures reduce the noise and vibration to acceptable levels.

12•94 In addition to the existing sources of noise and vibration, several proposed land uses in the OA have the potential to generate noise or vibration. These include new cultural facilities, bars and restaurants, road traffic, delivery vehicles and building services plant. Noise and vibration associated with the construction and demolition process is also a concern for the existing population, especially given the scale of development, phasing and the long term duration of construction. This is further considered in the section on 'Demolition, Excavation and Construction Impacts'.

12•95 Planning applications in the OA must be accompanied by a noise impact assessment, prepared in consultation with authority Environmental Health Officers. This assessment will need to identify existing and potential sources of noise and vibration and the potential impacts and mitigation measures for

the existing and new population. Noise sensitive land uses, such as residential dwellings, schools and hospitals, are those sensitive to existing sources of noise. The noise impact assessment will also need to determine the Peak Particle Velocity (PPV) and Vibration Dose Value (VDV) levels to establish the impact of traffic, including the impact of freight and passenger trains using the West London Line and District Line on buildings and general amenity.

12•96 In accordance with National and European legislation, the Department for Environment, Food and Rural Affairs (Defra) is currently implementing a requirement to prepare Noise Action Plans (NAPs) that address and improve noise within the noisiest areas. The London Agglomeration NAP (March 2010) identified roads adjacent to the OA, including West Cromwell Road and Warwick Road, as containing "1st priority" locations for further investigation of traffic noise levels. The Highway Authority, in consultation with Environmental Health, must give consideration to how traffic noise in these 1st Priority Locations can be minimised through the use of appropriate mitigation measures. Given the scale of the proposed development, its location bounded by four major roads and the likely impact of road traffic noise from the development, the NAP shall be required to include the major development proposals within the OA. Applicants will

need to work closely with the Highway Authority and Environmental Health Departments to ensure that development proposals contribute to the production and implementation of the Defra NAP.

### Residential Noise Standards

12•97 All new housing should be designed to ensure that the internal noise levels are 'good' in accordance with BS8233, where individual noise events should not normally exceed 45 dB LAMax at night in bedrooms. Acoustically attenuated passive or mechanical ventilation should be installed as necessary. The location, design and internal layout of residential accommodation should ensure that living areas are located away from primary noise sources. Buildings should also be laid out so that alike rooms are above each other (i.e. bedrooms over bedrooms) and avoid stairs / common parts next to noise sensitive rooms.

12•98 Developments should be constructed so that the impact of vibration from existing road, rail and industrial / commercial premises (e.g. gyms) falls into the category of 'Low Probability of adverse comment' as defined in BS6472. Private and communal gardens should be designed where practicable so that the steady noise level does not exceed the upper limit as cited in BS8233.

# Noise and Vibration

## Industrial and Commercial Noise Standards

- 12•99 All developments and/or associated plant should be designed to ensure the existing ambient background noise levels at the nearest noise sensitive premises are not increased (i.e. that the rated level is at least 10dB (A) below the measured background level). Assessment shall be in accordance with the detailed requirements of the RBKC Noise SPD in both boroughs.
- 12•100 Commercial servicing areas should be located away from residential areas and/or enclosed where possible. Delivery, goods handling operations and collection times will need approval as part of a servicing management plan to be secured by condition of planning permission. Noise from these activities shall be assessed as per section 6.3 of the RBKC Noise SPD in both boroughs.

## Entertainment Noise Standards

- 12•101 Any development that provides music or entertainment (e.g. restaurants, pubs, clubs, and retail outlets) must be designed and constructed to ensure that the activities are inaudible at any noise sensitive premises, especially residential premises. Noise from these uses shall be assessed as per chapter 8.0 of the RBKC Noise SPD in both boroughs.

## School Noise Standards

- 12•102 New educational facilities or improvements to existing facilities should be done so in accordance with Part E of the Building Regulations 2003 and Building Bulletin 93: Acoustic Design for Schools.

## Ecology and Biodiversity

12

### Context

12•103 Ecology and biodiversity within the OA is predominantly found in a semi-natural green corridor running along the West London Line. There are two Sites of Nature Conservation Importance (SNCI) within this corridor (both Borough Grade I), and a further 12 SNCI's within 1km of the OA (all Local) including Brompton Cemetery. The 'Earl's Court and West Kensington OA – Ecological Aspirations report', which supports this SPD, sets out details on the ecological value of these SNCIs, including details of species found within 1km of the OA.

### Policy Context

#### 12•104 **The Mayor's London Plan (2011):**

- 'Urban Greening' (Policy 5.10),
- 'Green Roofs and Development Site Environs' (Policy 5.11), and
- 'Biodiversity and Access to Nature' (Policy 7.19).

#### 12•105 **LBHF's Core Strategy (2011):**

- 'Improving and Protecting Parks and Open Spaces' (Policy OS1).

#### 12•106 **RBKC's Core Strategy (2010):**

- 'Earl's Court' (Policy CP10 and associated Vision); and
- 'Biodiversity' (Policy CE4).

#### 12•107 **LBHF Draft Biodiversity Action Plan and RBKC Biodiversity Action Plan.**

#### 12•108 **London Biodiversity Action Plan.**

#### 12•109 **Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011), DEFRA.**

#### 12•110 **LBHF Parks Strategy.**

12•111 Paragraphs 98 and 99 of Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 also provides information on Biodiversity Action Plans and the consideration of protected species in the planning system. Natural England has also produced guidance on likely impacts of development proposals on protected species.



## Ecology and Biodiversity

### Protect and Enhance Ecology and Biodiversity

#### Key Principle ENV18:

Development will be expected to protect and enhance ecology and biodiversity within and adjacent to the OA with no net loss of species or habitat by:

- Protecting and enhancing the Sites of Nature Conservation Importance (SNCI) adjacent to the northbound West London Line platform at West Brompton Station;
- Replacing other Sites of Nature Conservation Importance to a significantly higher standard within the OA;
- Ensuring that there is no net loss (in area) of Sites of Nature Conservation Importance;
- Creating further habitats through the provision of open space, landscaping and tree planting focussing on priority native habitats suitable to the area (acid grassland, woodland and freshwater habitats);
- Ensuring that all green open space is connected to form a network of green spaces, with a focus on north-south connectivity;
- Delivering Sustainable Urban Drainage systems in the form of swales, rain gardens, ponds and surface drainage systems to provide habitat diversity;
- Requiring, where feasible, for all buildings to include green and brown roofs, together with some green walls, to encourage biodiversity habitats, facilitate migration,

improve insulation, reduce the impact of the urban heat island effect, help regulate building temperatures and attenuate stormwater flows;

- Minimising light pollution to areas sensitive to bats and other wildlife.

#### Key Principle ENV19:

Major planning applications in the OA must be accompanied by an Ecological Impact Assessment, including an ecological survey and ecological enhancement strategy. An ecological management plan will also be required through any Section 106 agreement.

- 12•112 Owing to its important habitat and SNCI designation, development will need to protect the ecological habitat immediately to the west of the West London Line northbound platform. This area is managed by the Local Agenda 21 Forum in partnership with Network Rail. If access to West Brompton Station is improved, proposals will need to be designed to incorporate this ecological feature. It contains a natural pond with water flowing from the exposed river gravels sitting on clay, which have allowed for a luxuriant growth of great reedmace (*Typha latifolia*), with smaller amounts of water plantain (*Alisma plantago-aquatica*) and floating sweet-grass (*Glyceria fluitans*). Also found in the area are *Ranunculus lingua* and

*Scrophularia auriculata*, which are not found elsewhere in LBHF. There have also been sightings of *Bufo bufo* (the common toad) and *Acheta domesticus* (the common cricket) and has an extensive habitat for *Lucanus Cervus* (stag beetles). This area was botanically surveyed by LBHF biodiversity officers in June 2010 when 99 native vascular plants were identified on one day.

- 12•113 The OA contains some valuable areas for ecology and biodiversity, especially along the railway lines. However, an important component of this framework is that development improves east-west connectivity by decking over the railway lines. The proposed decking over the West London Line and District Line provides publicly accessible green open space in the form of a linear park. The nature of this linear park, and open space in general, is set out in the Urban Form Strategy (Chapter 4). It is imperative that in addition to the space to be provided for recreational purposes in the linear park, additional space is provided to accommodate the re-provision of SNCIs affected by decking over the railway lines. In order to justify the potential disruption and relocation, the new ecological and biodiversity areas must provide significantly better habitats than currently exist in the OA and these must be provided on-site.

## Ecology and Biodiversity

12

- 12•114 In addition to this, other elements of the development must be designed to improve the ecology and biodiversity value of the OA, and protect SNCIs adjoining the OA, such as through the provision of native species of street trees, landscaping, green and brown roofs/walls and Sustainable Urban Drainage systems (swales and open water courses). The OA is also well located to attract protected species such as Great Crested Newts and bats roosting in trees or under old arches and measures to encourage these species should be considered. Significant piles of dead wood from large logs may also be ideal habitat for *Lucanus cervus* (the stag beetle).
- 12•115 Major planning applications in the OA must be accompanied by an Ecological Impact Assessment, including consideration of the impact of development on adjoining SNCI and an ecological enhancement strategy. An ecological management plan will be secured through any Section 106 agreement. These documents will need to reflect LBHF (Draft), RBKC and London Biodiversity Action Plans (BAPs), which identify local habitats that are important in both boroughs and the borough's strategy to improve ecology and biodiversity.

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Figure 12.9: The vegetation and semi-natural refuge that runs alongside the West London and District Lines



# 13 PHASING & SECTION 106 STRATEGY

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## Overview

13

### Key Objectives

- Ensure a comprehensive approach to redevelopment of the OA; and
- Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.

13•1 This chapter identifies the planning obligations that would need to be secured and the phases at which these should be delivered, where known, in order that any redevelopment proposals would deliver the Key Objectives and Key Principles that have been identified within the individual topic based chapters of this SPD. The list is not exhaustive but would form a starting point for negotiations and priority setting by the authorities.

13•2 The authorities will ensure that the development is carried out and delivered in accordance with the relevant London Plan and Core Strategy policies and insofar as may be appropriate, taking into account other material considerations, the Key Objectives and Key Principles of this SPD, which have been drafted with the need for flexibility in mind such that they can be applied to any application coming forward in the OA.

13•3 In order to achieve this, the council will require the following:

**1:** the appropriate contributions (either in kind or financial);

**2:** the appropriate mitigation measures to address any attendant impacts of the proposals; and

**3:** the relevant contribution or mitigation measures, secured within the relevant phase of the development.

## Policy Context

### 13•4 The Mayor's London Plan (2011)

- 'Annex One' (Opportunity and Intensification Areas)';
- 'Planning Obligations' (Policy 8.2); and
- 'Community Infrastructure Levy' (Policy 8.3).

### 13•5 LBHF's Core Strategy (2011)

- 'Strategic Site and Housing Regeneration Area - FRA 1'; and
- 'Delivery and Monitoring'.

### 13•6 RBKC's Core Strategy (2010)

- 'Earls Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' (Policy CA7); and
- 'Infrastructure Delivery and Planning Obligations' (Policy C1).

### Mayoral Community Infrastructure Levy

13•7 The Mayor has prepared draft proposals for a levy on development proposals within Greater London in order to fund infrastructure requirements including Crossrail. The levy comes into effect on 1st April 2012 and will be a material consideration when determining planning applications

## Key Principles

### Key Principle PS1:

Planning obligations will be secured to ensure the delivery of a comprehensive and acceptable phased approach to any redevelopment of the OA.

13•8 The authorities will require a comprehensive approach to redevelopment of the OA. This reflects the requirements of the site specific policies in the Mayor's London Plan (2011), LBHF's Core Strategy (2011) and RBKC's Core Strategy (2010). The use of appropriate planning obligations will be sought to ensure the delivery of a comprehensive and acceptable phased approach to any redevelopment in order that the Phasing and Section 106 Strategy Key Objectives can be met.

## Key Principles

13

### Key Principle PS2:

Any application for the comprehensive redevelopment of the OA should include a phasing strategy which would need to demonstrate that the proposed redevelopment together with re-provision of the existing housing would be carried out with the minimum disruption to existing residents.

- 13•9 This strategy would need to demonstrate that the proposals would achieve an orderly and satisfactory development of the site and would need to set out how the appropriate land uses and infrastructure requirements are included at each relevant phase.

### Key Principle PS3:

Any planning agreement would need to ensure that each phase of development is self-sufficient in terms of its planning contributions towards environmental improvements, infrastructure and land uses.

- 13•12 Any planning agreement needs to be structured in such a way so that were development to stop, the authorities would have secured the necessary contributions in order to deliver the infrastructure and land uses directly required for the needs of the development at the time. The authorities will also look to secure the provision of temporary facilities where relevant. In some circumstances, the

authorities will expect the infrastructure or land use to increase incrementally with development. This is particularly true of publicly accessible open space, play space (UF17) and affordable housing (HO9) and any planning agreement would need to tie down the delivery of these.

### Key Principle PS4:

Any planning agreement would need to include triggers requiring the delivery of/contributions towards necessary infrastructure to coincide with development/occupation. It should also include contingency plans should the comprehensive redevelopment of the OA not be completed as envisaged at the time any planning permission is granted.

- 13•10 It is important that the OA is provided with the necessary infrastructure and land uses to support the needs of the new community. If delivered too early, these facilities are likely to be underused and therefore waste public and private assets. If delivered too late, the existing facilities in the vicinity of the OA could have an undue burden placed on them, hindering their ability to operate. The authorities will therefore require any planning agreement to include a number of triggers which ensure that infrastructure and land uses are delivered at the right time in order to support the growing needs of the population.

- 13•11 Contingency plans may be required for the delivery of infrastructure and land uses where relevant. The authorities for example, consider east-west connectivity across the OA to be key to the wider delivery of comprehensive redevelopment and will therefore look to secure its delivery as early as possible (see para 4.15). The authorities may therefore require a contingency plan to be put in place to ensure the delivery of an east-west route through the OA should comprehensive redevelopment of the OA not proceed in the way envisaged in the Phasing Strategy required in Key Principle PS2.

# Urban Form Strategy

## Key Objectives

- Maximise connectivity;
- Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces;
- Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;
- Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context;
- Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape; and
- Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

## List of planning obligations arising from the SPD:

### 13•13 Public Open Space;

- public open space (including a contiguous park of 2 hectares), delivered incrementally on a phased basis attendant to the increase in the living and working populations (**Key Principle UF12**); and

- equipped play facilities that meet the locational standards set out in the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008) and that are of a size that adequately caters for children in their catchments (**Key Principle UF16**).

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Photo by A&M Photography



Photo by David Millington Photography Ltd



Photo by Joe Miles

Figures 13.1 to 13.6: Precedent images for open spaces

## Housing Strategy

13

### Key Objective

Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

#### List of planning obligations arising from the SPD:

##### 13•14 Estate Regeneration:

- any development proposals involving the regeneration of the West Kensington and Gibbs Green estates to ensure that they would not result in the net loss of any affordable housing both in terms of floorspace and numbers of units (**Key Principle H02**);
- any affordable housing provided to facilitate the re-provision of housing for the residents of the estates to demonstrate that it would address the housing needs in the individual phases of the development (**Key Principle H03**);
- the social rented housing provision on the Seagrave Road car park site to provide a mix which would facilitate the re-provision of housing for an identified proportion of the residents of the estates (**Key Principle H04**); and
- a Phasing Strategy which demonstrates minimal disruption to existing residents when redeveloping the OA (**Key Principles H05 and PS2**).

##### 13•15 Tenure Mix:

- the appropriate levels and mix of affordable housing in LBHF (**Key Principle H06**) and RBKC (**Key Principle H07**); and
- measures to control the affordability and management of affordable housing within the OA (**Key Principles H010 and H011**).



Figure 13.7: Photograph of a new housing development at River Gauche, Paris. Photograph by Urban Exposure

## Employment Strategy

### Key Objective

Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

#### List of planning obligations arising from the SPD:

##### 13•16 Business Provision:

- affordable business space suitable for very small, small and medium sized enterprises and incubator units (**Key Principle ES5**).

##### 13•17 Employment and Training:

- contributions towards sector specific support for business affected by the closure of the Earl's Court Exhibition Centres (**Key Principle ES6**);
- procedures and financial contributions towards cost of facilitating local procurement (**Key Principle ES7**);
- support and funding of Workplace Coordinators to ensure local people benefit from employment opportunities (**Key Principle ES8**);
- a Construction Training Centre to be provided pre and during construction (**Key Principle ES8**);
- provision of a Recruitment and Job Shop (**Key Principle ES8**);
- a Local Labour, Skills and Employment Strategy (**Key Principle ES9**); and
- a Local Labour, Skills and Employment Delivery Plan (**Key Principle ES9**).

## Retail Strategy

### Key Objectives

- New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and
- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

### List of planning obligations arising from the SPD:

#### 13•18 Retail Controls:

- a Retail Management Plan which controls issues such as phasing, size of retail units, convenience /comparison split by floorspace, limitations on other retail related uses (A Classes), range and number of independent shops, prohibition on mezzanine floors and active frontages (**Key Principle RS5**);
- affordable shops (**Key Principle RS7**); and
- the allocation of land, with a North End

Road address, for the potential relocation of North End Road street market (**Key Principle RS8**).



Figure 13.8: Retail in the area surrounding the OA

## Culture Strategy

### Key Objectives

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

### List of planning obligations arising from the SPD:

#### 13•19 A New Cultural Destination:

- cultural facilities, including affordable workshop/studio space, to be provided within early development phases (**Key Principles CS1, CS2 and CS3**);
- contributions towards the enhancement of Brompton Cemetery (**Key Principle CS1**); and
- affordable artists studios (**Key Principle CS3**).

#### 13•20 Public Art:

- public art (**Key Principle CS5**).

## Social & Community Facilities

13

### Key Objective

Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

#### List of planning obligations arising from the SPD:

##### 13•21 Education:

- contributions (in kind and financial) towards the relevant nursery, primary and secondary education provision. The primary and secondary school should be co-located and provided within the early phases of development (**Key Principle SC1**).

##### 13•22 Health:

- a health facility, to be provided within early development phases (**Key Principle SC2**); and
- financial contributions towards health provision (**RBKC Core Strategy Policies CA7 and C1**).

##### 13•23 Sports and Leisure:

- affordable sports and leisure provision (**Key Principle SC4**).

##### 13•24 Police Facilities:

- a community policing facility and financial contributions towards staffing the facility (**Key Principle SC6**); and
- financial contributions towards CCTV and expanding capacity in the boroughs' CCTV control centres (**Key Principle SC6**).

##### 13•25 Community Space:

- a community hub to be provided within early development phases (**Key Principle SC7**); and
- social and community floorspace in the Earl's Court Strategic Site (**RBKC Core Strategy Policies CA7 and C1**).



Figures 13.9 and 13.10: Photographs by Dave Morris

# Transport & Accessibility Strategy

## Key Objectives

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

13•26 It should be noted that redevelopment within the OA is likely to be delivered in phases over a period of many years. The delivery of development will need to be coordinated with capacity improvements to public transport and the road network. Development proposals must be supported by a robust Transport Assessment that sets out clearly demand by phase, including construction traffic, and sets that against the available transport capacity. A series of interim assessments of impact will need to be made so that the cumulative impacts of development phases are understood and to ensure that development is

brought forward only when sufficient transport improvements are in place to accommodate it. The delivery of development will need to be controlled via planning obligations to ensure that development is only implemented once appropriate transport improvements are in place.

13•27 Any changes to the road network, London Underground and Network Rail facilities and London Buses are subject to detailed design and operational agreement by the relevant organisations.

### List of planning obligations arising from the SPD:

#### 13•28 Walking and Cycling:

- all streets to be built to adoptable standards and offered for adoption to the relevant Highway Authority (**Key Principle TRN3**);
- a comprehensive wayfinding strategy in line with TfL's Legible London standards (**Key Principle TRN5**);
- significant streetscape and footway capacity improvements on the roads surrounding the OA— in particular North End Road, Warwick Road, Old Brompton Road / Lillie Road, West Cromwell Road (A4 improvement scheme) and Earl's Court Road (**Key Principle TRN6**);
- improved pedestrian crossings on Lillie Road at West Brompton station, on Warwick Road at Earl's Court station,

at West Cromwell Road's junctions with North End Road and Warwick Road and any potential crossing at the proposed new A4 junction (**Key Principle TRN7**);

- new pedestrian and cycle connections north under the A4 West Cromwell Road and south under Lillie Road, if required following investigation as part of the Transport Assessment(s) (**Key Principle TRN7 and TRN8**);
- improved east west cycle connectivity and linkages into the OA as identified within Transport Assessment(s) (**Key Principle TRN8**);
- cycle parking in the OA, on the surrounding streets and at all local stations (**Key Principle TRN9**); and
- an extension of the Mayor's cycle hire scheme into the OA (**Key Principle TRN9**).



Figure 13.11: The London Underground



## Transport & Accessibility Strategy

13

### 13•29 Public Transport:

- reopening of the pedestrian tunnel under Warwick Road, including step-free access and/or increases to gateline capacity at the Warwick Road entrance to Earl's Court Station (**Key Principle TRN12**);
- a new station entrance to the eastern end of West Kensington Station, including step-free access and/or increased gateline capacity at the current entrance (**Key Principles TRN13 and TRN14**);
- improved gateline capacity at West Brompton Station (**Key Principle TRN 13**);
- increased concourse space at West Brompton Station (**Key Principle TRN13**);
- implementation of improvements to stairways at West Brompton Station, subject to investigation of feasibility and heritage concerns (**Key Principle TRN13**);
- step-free access to all platforms at West Kensington Station (**Key Principle TRN 14**);
- step-free access to the south-bound District Line platform at West Brompton station (**Key Principle TRN 14**);
- platform lengthening at West Brompton Station to allow for eight car trains, including any associated station improvements to ensure sufficient capacity to accommodate any additional passengers (**Key Principle TRN15**);
- improvements to the public realm and interchange facilities at each of the three

local stations (**Key Principle TRN16**);

- measures to provide increased bus capacity including provision of bus route enhancements (**Key Principle TRN17**);
- improvements to bus stops and other facilities, including re-provision of bus stands (**Key Principle TRN17**); and
- taxi ranks and coach parking and drop off facilities (**Key Principle TRN18**).

### 13•30 Road Network, Car Parking and Freight;

- north-south connectivity through the OA to provide extra road capacity (**Key Principle TRN19**);
- a new access onto the A4 West Cromwell Road (**Key Principle TRN19**);
- a study to identify and then funding to implement any necessary signal changes on the surrounding road network (**Key Principle TRN19**);
- reconfiguration of the North End Road and Lillie Road junction and the provision of alternative routes through the site to relieve traffic congestion (**Key Principle TRN19**);
- other new site accesses, as agreed with the Highway Authorities (**Key Principle TRN19**);
- a review of local traffic management arrangements and mitigations where appropriate to address 'rat running' issues (**Key Principle TRN21**);
- investigation of improvements to the Earl's

Court One Way System, including to the pedestrian environment, and funding of identified measures (**Key Principle TRN 22**);

- car club bays (**Key Principle TRN24**);
- electric vehicle charging points (**Key Principle TRN24**);
- Travel Plans for all uses (**Key Principle TRN24**);
- all new residential units to be Permit-free (**Key Principle TRN25**);
- on-street parking an a review of existing CPZs and mitigations, including extension or amendments to existing zones or new zones (**Key Principle TRN25**);
- consolidated local delivery and servicing centres for freight and domestic deliveries (**Key Principle TRN26**);
- a rail freight transfer facility for construction materials and spoil removal subject to feasibility analysis as part of the Transport Assessments (**Key Principle TRN26**);
- Delivery and Servicing Plans (**Key Principle TRN26**); and
- Construction Logistics Plans for each relevant phase of development (**Key Principle TRN26**).

## Energy Strategy

### Key Objectives

- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

#### List of planning obligations arising from the SPD:

##### 13•31 Supplying Energy Efficiently:

- decentralised energy (including associated heat network), associated energy centres and infrastructure, including the provision of an energy centre in the first phase of the development (**Key Principle ENE2**).

## Environmental Strategy

### Key Objectives

- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

#### List of planning obligations arising from the SPD:

##### 13•32 Demolition, Excavation and Construction Impacts:

- construction, demolition and excavation logistics plans (**Key Principle ENV2**).

##### 13•33 Waste Management:

- at least one centralised waste management facility (**Key Principle ENV8**);and
- a Site Waste Management Plan prepared in accordance with Defra Guidance (**Key Principle ENV11**).

##### 13•34 Ecology and Biodiversity:

- an ecological management plan (**Key Principle ENV19**).



Figure 13.12: Site of Nature Conservation Importance, viewed from Seagrave Road car park.

# Core Strategy

Local Development Framework  
October 2011



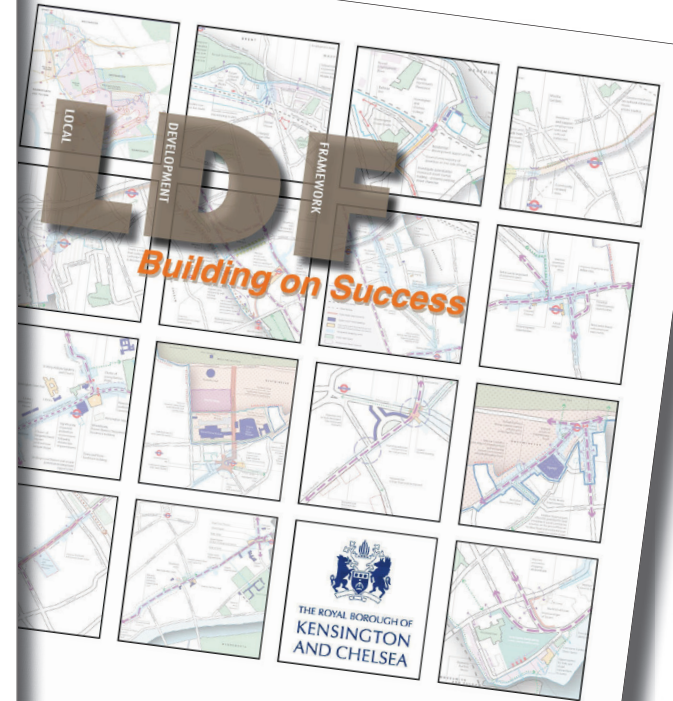
[www.lbhf.gov.uk/ldf](http://www.lbhf.gov.uk/ldf)  
Hammersmith & Fulham Council



# THE LONDON PLAN

SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON  
JULY 2011

MAYOR OF LONDON



**Core Strategy**  
for the Royal Borough of Kensington and Chelsea  
with a Focus on North Kensington  
Development Plan Document

Adopted: 8th December 2010

# POLICY CONTEXT APPENDIX

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## Policy context

- A•1 This appendix sets out the regional (London wide) and local policy context specific to the OA.
- A•2 In addition to these OA specific planning policies, there are also theme based national, regional and local planning policies which apply to any redevelopment of the OA. The Mayor of London has other theme based Supplementary Planning Guidance (such as the The London Plan Housing SPG (2005), the Interim Housing SPG (2010) and the Housing SPG EiP draft (2010)) and both boroughs also have theme based Supplementary Planning Documents (such as Noise / Air Quality

SPDs in RBKC) which also apply to redevelopment of the OA.

## Regional Policy

### The Mayor’s London Plan July 2011

- A•3 Table A1.1 in Annex 1 of the London Plan (2011) identifies Earl’s Court and West Kensington as an Opportunity Area to deliver the following:

Ref	Location	Area (ha)	Indicative employment capacity	Minimum new homes	OAPF Progress	Strategic policy directions
8	Earl’s Court and West Kensington	36	7,000	4,000	2	The Area presents a significant opportunity for regeneration comprising estate renewal and housing and employment growth. A comprehensive approach should be taken to planning the future of the exhibition complex, the Transport for London Lillie Bridge Road depot, the local authority housing estates and other sites in the vicinity. 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. The Mayor is working with the boroughs and landowners to develop a planning framework for the area. This, informed by a transport study, will determine the optimum development capacity for the area which is likely to be significantly higher than the minimum figures shown here. Earl’s Court has good public transport facilities and these should be further enhanced, together with comprehensive highway and streetscape improvements. Earl’s Court already benefits from a strong identity, distinctive townscape and a range of heritage assets, all of which should be upheld and promoted through the regeneration and growth of the area.

Figure A.1: Identification of the OA as set out in Table A1.1 in Annex 1 of the London Plan (July 2011)

## Regional Policy

- A•4 Policy 2.13 of the Mayor's London Plan (2011) sets out the Mayor's role in relation to Opportunity Areas, what development proposals within Opportunity Areas should achieve and what local authorities should produce in their LDFs.

### **POLICY 2.13 OPPORTUNITY AREAS AND INTENSIFICATION AREAS**

#### **Strategic**

- A Within the opportunity and intensification areas shown in Map 2.4 [of the London Plan], the Mayor will:
- provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realize these areas' growth potential in the terms of Annex 1, recognising that there are different models for carrying these forward; or
  - build on frameworks already developed; and
  - ensure that his agencies (including Transport for London) work collaboratively and with others to identify those opportunity and intensification areas that require public investment and intervention to achieve their growth potential.
  - encourage boroughs to progress and implement planning frameworks to realise the potential of intensification areas in the terms of Annex 1, and will provide strategic support where necessary.

#### **Planning decisions**

- B Development proposals within opportunity areas and intensification areas should:
- support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks
  - seek to optimize residential and non residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses
  - contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks
  - realize scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking
  - support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.

#### **LDF preparation**

- C Within LDFs boroughs should develop more detailed policies and proposals for opportunity areas and intensification areas.

Figure A.2 (right): Policy 2.13 of the London Plan (2011): Opportunity Areas and Intensification Areas

## Local Policy

### LBHF Core Strategy (2011)

- A•5 LBHF's Core Strategy Strategic Site and Housing Estate Regeneration Area – FRA 1 sets out LBHF's strategic policy in relation to the part of the OA in LBHF.

#### Earl's Court West Kensington Opportunity Area strategic site and housing regeneration area (Earl's Court Exhibition Centre 2 and Seagrave Road car park, Lillie Bridge Depot, West Kensington and Gibbs Green states, and adjacent land).

Earl's Court and West Kensington Opportunity Area	
Indicative minimum homes	Indicative new jobs
1,500 in H+F	5,000-6,000 in H+F
2,000 in H+F and RBKC	7,000 in H+F and RBKC

Owner: Private, TfL, Network Rail, Council, RSL and private owners. The Earl's Court & West Kensington Opportunity Area covers development sites within both the London Borough of Hammersmith & Fulham and the Royal Borough of Kensington & Chelsea.

There should be a phased comprehensive mixed use residential led masterplan for the Opportunity Area that provides housing, employment, hotels, leisure, offices and associated facilities, including retail to cater for day to day needs and cultural facilities. This should include a major arts, leisure or entertainment activity that will be major visitor attractor and create significant new employment opportunities. New local educational, health and community facilities, and new public and private open space should be provided.

Regeneration of the West Kensington, Gibbs Green and Registered Provider estates phased over up to 20 years will be considered as part of the comprehensive approach to the opportunity area. All existing local residents should have the opportunity to be rehoused within the opportunity area or within its vicinity if proposals affect their homes.

There should be a substantial overall net increase in housing. 40% of all new housing in the opportunity area (within H&F) should be affordable in accordance with Policy H2 Affordability. With any proposals to replace existing social rented housing, the existing quantity should not be reduced but it should be redistributed across the opportunity area. Overall, new residential should have a mix of tenures, dwelling sizes and types, including family housing; and be provided in densities and layouts that are compatible with high quality living environments for a mixed and balanced community.

The part of the area north of Lillie Road should be designed as a vibrant world class new quarter in inner West London linking well with its physical and commercial surroundings, especially to the west and east. If the TfL depot has to remain it should be decked over provided that achieves planning benefits and is viable within an acceptable scheme. Building design should be of the highest quality. There may be some scope for tall buildings no higher than, and close to, the existing Empress State building, however, any tall buildings would need to be justified by a full urban design analysis.

Figure A.3 (right): 'Strategic Site and Housing Estate Regeneration Area – FRA 1' in LBHF's Core Strategy (2011)

## Local Policy

A

The Seagrave Road car park must be considered as part of the comprehensive approach to the opportunity area. It should be primarily for residential purposes with supporting facilities, including public open space. Other employment based uses may be appropriate as part of a comprehensive development scheme for the site. The feasibility to provide direct access from Seagrave Road and the site as whole to West Brompton station should be considered. Development proposals for Seagrave Road should provide for the opportunity to deliver approximately 25% of all housing as social rented housing subject to estate regeneration coming forward, detailed analysis and viability. This will provide opportunities for tenants on local housing estates to be re-housed into better accommodation and to facilitate regeneration on those estates.

Overall, the design, layout, massing and density of development must take account of and respect the local context and setting, local conservation areas, and local views. However, development should also recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. For the Seagrave Road site, the design must also take account of views from the Listed Brompton Cemetery, and local nature conservation.

On site street patterns and connections must be designed with regard to improving traffic, pedestrian and cycling circulation in the surrounding area and on primary routes in Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea. Development must improve pedestrian connections from the sites and the surrounding area to public transport facilities, particularly Earl's Court.

The acceptable overall quantity of development will depend on a range of factors, especially urban design considerations, the provision of satisfactory residential standards and environmental conditions, and evidence to support non-residential uses; and, in addition, it must not exceed what is compatible with a transport capacity and the identification of deliverable improvements in the transport infrastructure. Development must also take account of the capacity of the physical infrastructure, particularly for sewerage and surface water. Any development proposals will need to address the flood risk potential as the site lies in a High/Medium Residual Risk area.

All development must incorporate high levels of environmental performance by the use of low and zero carbon technologies, including combined heat and power, the establishment of a decentralized energy network and the installation of renewable energy systems

Development must have regard to guidance set out in the Earls Court/West Kensington Opportunity Area Supplementary Planning Document.

Figure A.3b (right): 'Strategic Site and Housing Estate Regeneration Area – FRA 1' in LBHF's Core Strategy (2011) (contd.)



## Local Policy

A

### RBKC Core Strategy (2010)

- A•6 The part of the OA within RBKC falls within the Earl's Court Exhibition Centre Strategic Site, which is identified within Policy CA7 (Chapter 26) of RBKC's Core Strategy (2010).

#### Policy CA 7

##### Earl's Court Exhibition Centre

##### Allocation for Earl's Court Exhibition Centre

The Council allocates development on the site to deliver, in terms of:-

##### Land use allocation:

- a. a minimum of 500 homes within the Royal Borough, which could be increased, in particular if (b) to (e) below are provided within LBHF as part of the masterplanning process conducted in the preparation of the SPD;
- b. a minimum of 10,000m<sup>2</sup> (108,000 ft<sup>2</sup>) of office floor space;
- c. retail and other uses within the A Class of the Use Classes Order 1987 (as amended) to serve the day-to-day needs of the new development;
- d. a significant cultural facility 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;
- e. other non-residential uses required to deliver a sustainable and balanced mixed-use development, such as hotel and leisure uses;
- f. social and community uses;
- g. on-site waste management facilities to handle waste arising from the new uses of the site (including recycling facilities and/or anaerobic digestion), which may be provided within LBHF as part of the masterplanning process conducted in the preparation of the SPD but must benefit development in the Royal Borough;
- h. low or carbon neutral developments and a Combined Cooling, Heating and Power (CCHP) plant or similar, of a suitable size to serve the site with the potential to contribute to the heat and energy demand of the wider community as part of a district heat and energy network, which may be provided within LBHF as part of the masterplanning process conducted in the preparation of the SPD but must benefit development in the Royal Borough;

Figure A.4 (right): Policy CA7 - 'Earl's Court Exhibition Centre' in RBKC's Core Strategy (2010)

## Local Policy

A

### **Principles:**

- i. a new urban quarter which links well with its surroundings, especially to the west and east;
- j. a design of the road network and connections with the surrounding area that 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;
- k. an open urban square, fronting onto Warwick Road, with land uses that provide positive active edges to the building frontages

### **Infrastructure and Planning Obligations:**

- l. social and community facilities;
- m. additional new public open space, including considering opportunities to create biodiversity;
- n. securing highway contributions including the investigation, in consultation with TfL and the Boroughs, into returning the Earl's Court one-way system two way working; implementation of those measures identified during the investigation commensurate to the development proposal; 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;
- o. improvements to tube, bus and rail access, including interchange from the West London Line to the underground network and the extension of bus services into the site;
- p. improved pedestrian links from and through the site and the surrounding area to public transport facilities and improved cycle links to enhance north/south cycle accessibility;
- q. affordable housing as part of residential requirement;
- r. educational facilities;
- s. other contributions as identified in the Planning Obligations Supplementary Planning Document and site specific Supplementary Planning Document.

Figure A.4b (right): Policy CA7 - 'Earl's Court Exhibition Centre' in RBKC's Core Strategy (2010) (contd.)



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 Supplementary Planning Document

## Consultation Summary Report

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# 1. Introduction

## 1.1 Overview

This report summarises the outcome of consultation on the Earl's Court West Kensington Opportunity Area (OA) Revised Draft Supplementary Planning Document (SPD). The six week statutory consultation period ran from Friday 11 November to 5pm on Friday 23 December, although representations made after this date were accepted.

1.2 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.

A summary of all previous consultation on the emerging SPD is set out in the Statement of Consultation February 2012. A summary of the consultation on the initial Issues and Opportunities Leaflet (Oct / Nov 2010) is set out in the Preliminary Consultation Report 2011. A summary of the consultation on the first draft SPD (Mar / April 2011) is set out in the Consultation Summary Report November 2011.

## 1.3 Consultation Status

Consultation on the Revised Draft SPD is 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).

## 1.4 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.

1.5 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.

## **1.6 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.

- 1.7 The West Kensington and Gibbs Green housing estates lie to the west of the Earl's Court Exhibition Centres 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.





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

## **2. Method of Consultation**

### **2.1 Overview**

Several consultation techniques were used to engage the public and interested parties to encourage feedback, in accordance with both boroughs' Statement of Community Involvement, namely;

- Consultation letter distributed to surrounding properties
- Consultation letter mail-out to interested parties
- Public Notice in local newspapers
- SPD Distribution to interested parties (both hardcopy and CD formats)
- Availability of the SPD for inspection at several public locations
- 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 two workshop events with the Earl's Court Society.

Further details of the various consultation techniques are provided below:

### **2.2 Consultation Letter**

Approximately 45,000 individually addressed letters were sent to:

- Statutory consultees
- all individuals and groups on the RBKC and LBHF Local Development Framework database;
- to nearly all properties within 650 metres of the OA
- Some special interest groups were also sent a letter and;
- those who commented through the March/ April consultation.

The letter introduced the Revised Draft SPD and invited comments.

### **2.3 Public Notice**

A public notice was placed in the Kensington and Chelsea and the Hammersmith and Fulham Chronicle on Friday 11 November 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.

### **2.4 SPD Distribution**

A hardcopy and/or CD of the Revised Draft SPD and all supporting information was sent to statutory organisations and other selected interested parties. The Revised Draft SPD was also sent to people or organisations who requested copies. Copies of the draft SPD were also made available for inspection, during normal office hours, at the following locations:

- Duty Planning Office, Hammersmith Town Hall Extension
- Planning Information Office, Kensington and Chelsea Town Hall
- Housing Office, Clem Atlee Estate
- Hammersmith Library

- Barons Court Library
  - Brompton Library
  - Kensington Central Library
  - Chelsea Library
  - Fulham Library
  - Earls Court Exhibition Centre and;
  - Greater London Authority, City Hall.
- 2.5 The Revised 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 Revised SPD and consultation letter) 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).
- 2.6 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 Revised Draft SPD.
- 2.7 Contact Phone Numbers**  
Dedicated consultation phone numbers (one for LBHF and one for RBKC) were publicised in the consultation letter, public notice and LBHF and RBKC websites, allowing members of the public to speak directly to the SPD team during office hours.
- 2.8 Presentations**  
The SPD team also made presentations to organisations who requested them. Presentations were given to the joint Design Review Panel, The Earls Court Society and to Gibbs Green and West Kensington Estate Residents Steering Board.
- 2.9 Planning Workshop**  
In response to requests from the Earl's Court Society (ECS), RBKC held two public workshop events to discuss the content of the Revised Draft SPD. Planning officers were responsible for the workshop programme. The ECS arranged the venue, catering and invitations. Both events were held in St. Cuthberts Church Hall, off Philbeach Gardens.
- 2.10 The first workshop was held on the 29 November 2011, where nearly 100 people attended to discuss the various chapters of the SPD (excluding Transport). The event started with short introductions from the Chair of the ECS, Earl's Court Ward Councillor and RBKC Planning Officer. In groups, participants were then shown the Key Objectives and Key Principles of a particular chapter of the Revised Draft SPD and asked to highlight which text they supported and which text they would change.
- 2.12 The second workshop was held on the 30 November 2011, where nearly 40 people attended to discuss Transport. As the Transport Study had not been

finalised in preparing the first draft SPD, this workshop began with short presentations by TfL on the Transport Study and RBKC on the Transport and Accessibility chapter of the SPD. This was followed by questions and answers. Then, as with the first workshop, participants were shown the Key Objectives and Key Principles in the Revised Draft SPD and asked to highlight which text they supported and which text they would change.

- 2.13 The findings of both workshops were written up by RBKC Planning Officers. These were then sent to the ECS to inform their comments on the Revised Draft SPD.

### **3. Consultation Objectives**

- 3.1 Consultation on the Revised Draft SPD had five key objectives to:

i) set out the changes in response to the 1<sup>st</sup> round of consultation held in March- April and to invite further comment on the revisions.

ii) consult on the completed Transport Study, Edges Study, Townscape & Visual Analysis, Office Study, Decentralised Energy Feasibility Study and the Estates Regeneration Economic Appraisal and additional work around the Development Capacity Scenarios, which did not form part of the Draft SPD in the first round of consultation

iii) refine key issues associated with redevelopment of the Opportunity Area and surrounding area.

iv) engage the public and interested parties in drafting the SPD prior to adoption by encouraging comments and feedback.

v) identify what changes and improvements should be made to the Revised Draft SPD.

## **4.0 Consultation Findings**

### **4.0.1 Overview**

335 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 3788 separate comments. Each comment was assigned to a specific chapter, section and/or key principle of the Revised Draft SPD.

The authorities also received a petition, with comments and signatures from 235 people, seeking the protection of the Earl's Court Exhibition Centres. RBKC responded to this petition in accordance with their standard procedures. The prayer of the petition and individual comments were also considered as part of the wider consultation on the Revised Draft SPD, as summarised below.

4.0.2 The SPD team has considered and responded to each comment and this is set out in the detailed consultation schedules, which will be published separately. These schedules 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.

4.0.3 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. The following summaries also identify where comments have led to changes being made to the SPD.

## **4.1 Introduction Chapter**

### **4.1.1 Overview**

A total of 28 comments were received on the introduction and 2 comments were received on the policy context (Appendix 1) summarised under the following topics:

- Status of the Document;
- Purpose of the Document;
- Structure of the Document; and
- Supporting Documentation.

4.1.2 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 (from Appendix 1 of the SPD) has been combined with the summary of comments on the introduction as there was much overlap and repetition of comments on both chapters.

#### **4.1.3 Status of the Document**

A number of consultees questioned the weight that should be afforded to the SPD both at the time on consultation of the revised draft Joint SPD and at adoption. An amendment has been made in the final SPD to reflect the weight that the document would have post adoption. A number of consultees asked for clarity around which documents the SPD provides supplementary guidance to. Additional text has been inserted into the SPD providing additional clarity.

- 4.1.4 In terms of the Policy Context in Appendix 1, one respondent requested changes to RBKC Core Strategy to ensure that the social and community uses (Policy CA7f) are not all located within LBHF and a clear commitment that development in the Thames to White City corridor will be refused if it cannot be accommodated on the transport network. No change is required as Policy CA7(f) already requires that social and community uses are located in RBKC because these cannot be 'traded' through RBKC Core Strategy Policy CA7(a). The Core Strategy cannot be revised through the SPD. RBKC Core Strategy already controls the impact of development on the transport network within the section titled 'Better Travel Choices'. The revised draft SPD (Key Principle TRN1) also requires development proposals to demonstrate that the impact of development on the transport network is acceptable.

#### **4.1.5 Purpose of the Document**

A number of consultees questioned whether it was appropriate for the SPD to have been produced in response to Capco's development proposals. In response to this, the text has been removed from the SPD. At the request of a consultee, text has been inserted into the SPD stating that the SPD is not intended to eliminate or constrain development in accordance with the relevant Development Plan Documents and that with this in mind, the SPD has been drafted with sufficient flexibility such that it can be applied to any development proposals coming forward in the OA.

- 4.1.6 One consultee requested an extension to the OA boundary. It was clarified that as the boundary to the OA is set within LBHF's Core Strategy, it would not be possible to make a boundary alteration. One consultee identified an error on information around land ownership within the OA. An amendment has been made to the SPD to reflect this change. Consultees were generally supportive of the identification of Key Principle HO1 in the introduction.

#### **4.1.7 Structure of the Document**

A number of respondents requested that the document provide an Executive Summary. The authorities consider that the Vision and Objectives (chapter 3) provide a succinct summary of the document, as these provide the vision for OA and the Key Objectives to achieve that vision taken from each chapter. It was considered that given the broad nature of topics covered in the SPD, it would not be possible to write an executive summary for the document, but that the titles for each chapter

should clearly signpost the parts of the document that would be of interest to interested parties.

#### **4.1.8 Supporting Documentation**

One consultee requested clarification that the illustrative images set out in the Development Capacity Scenarios supporting evidence paper should not fix a design form. This text has been added to the SPD. Another consultee identified that neither the Transport Study Review or Viability Summary supporting evidence papers were listed as supporting documents to the SPD, but were available for viewing and comment during the consultation period. This was an oversight and the two documents have been added to the final SPD.

## **4.2 Site Context Chapter**

### **4.2.1 Overview**

A total of 33 comments were received on the Site Context Chapter. They can be summarised under the following topic headings:

- Urban Form and Heritage Assets
- Transport and Accessibility
- Open Space
- Land Use
- Housing
- Retail

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

### **4.2.2 Urban Form and Heritage Assets**

The Hammersmith and Fulham Historic Buildings Group commented that they were pleased to see that the map showing the Conservation Areas in and around the OA had been brought forward in the second draft of the SPD. However, there was a general feeling amongst respondents that heritage assets were still not afforded appropriate significance by the SPD. Officers therefore decided to move this plan, the associated text and the text on the Historical Development of the area even further forward in the document, towards the beginning of the Site Context chapter. This revision means that the section on Heritage Assets now directly follows the section Urban Form, which it was felt also addressed English Heritage's request for the recognition of the significant surrounding heritage assets to be added to the Urban Form section of the Site Context chapter.

4.2.3 The Hammersmith and Fulham Historic Buildings Group were also keen to ensure that there was some cross-referencing to Conservation Area Profiles and Planning Policy Statement 5 (Planning for the Historic Environment) in the SPD. Friends of Brompton Cemetery also expressed a desire to see a reference to Planning Policy Statement 5. Officers agreed that the SPD would benefit from reference to both Conservation Area

profiles and Planning Policy Statement 5 and therefore added it to the Site Context Chapter.

4.2.4 The Kensington Society requested that the Edwardes Square/Scarsdale & Abingdon Conservation Area be shown on the map of conservation areas. Officers agreed and added it. Another respondent noted that the Whiteleys Cottages were not shown on this plan as locally listed. Officers have rectified this omission.

4.2.5 In terms of Urban Form, a number of respondents agreed with the authorities' observation that the OA is severed from its surroundings by the railway lines and exhibition centres. However, it was requested that reference should also be made to the severance caused by the volume and speed of traffic on Warwick Road. Whilst Officers agree that Warwick Road does inhibit pedestrian movement, it does not prevent connectivity in the same way that the railway lines or exhibition centres do, and therefore it was decided that no change to the SPD was necessary.

#### **4.2.6 Transport and Accessibility**

One respondent requested a clearer indication of the date that the upgrades on the Piccadilly line would be completed and raised concerns that they will not address the existing capacity problems at Earl's Court station, especially at peak times. Officers considered these concerns, but came to the conclusion that the SPD did not need to be revised in light of them. In response to the first request, as there is currently no fixed date for the completion of the Piccadilly Line upgrade, this cannot be added to the SPD. In response to the second concern, Officers pointed out that the upgrade will provide an approximate 25% increase in line capacity through enabling more trains per hour and providing higher capacity rolling stock.

4.2.7 A couple of respondents raised concerns that the boundary roads on the edges of the OA are already at maximum capacity and that the junctions between them are some of the most polluted in the Capital. Officers reviewed the SPD in light of these comments, but remain satisfied that the issues they raise are addressed appropriately already.

#### **4.2.8 Open Space**

Comments received from the Open Spaces Society highlighted the importance of communicating the existing deficiency of publicly accessible open space in and around the OA. Having reviewed the SPD, Officers came to the conclusion that this is already clear and therefore, the authorities do not feel that any change is necessary. They also raised some concerns about the clarity and extent of the map that shows the open space deficiency in the SPD. Officers remain convinced that this is a useful illustrative tool that shows the problem at a glance, but added a new annotation to show the railway lines, in order to ensure that they are not confused with the area of open space deficiency.

#### **4.2.9 Land Use**



In terms of land use, the Metropolitan Police Authority & Metropolitan Police Services highlighted the fact that the OA includes the Empress State Building which currently functions as their operational headquarters. They requested that the SPD support the retention of policing at this location. Officers considered this request, but came to the conclusion that it would be too prescriptive for the SPD to specify any particular future use or occupier for the Empress State Building. Officers did point out however, that the SPD does require any office floorspace lost through a change of use at the Empress State building to be reprovided elsewhere in the OA (Key Principle ES1) and that any developer would be expected to establish and provide for the requirements of existing tenants.

#### **4.2.10 Housing**

Capco suggested that the Housing section of the Site Context chapter would benefit from additional information relating to current high house prices and lack of affordability in the area. Officers considered this suggestion, but concluded that, as information on house prices and affordability can quickly become outdated, it would not be added to the SPD.

#### **4.2.11 Retail**

One respondent requested that the Tesco supermarket near the north eastern edge of the OA should be shown in the figure that identifies local retail centres. Officers agreed that, although it is not a retail centre, as the supermarket provides convenience shopping for the local population it should be added to the map.

### **4.3 Vision and Objectives**

#### **4.3.1 Overview**

A total of 50 comments were received on the Vision and Objectives chapter. They can be summarised under the following topic headings:

- Vision and Key Objectives; and
- Illustrative Masterplan Images

A summary of the key issues and themes raised by respondents are set out below.

#### **4.3.2 Vision and Key Objectives**

The largest number of comments received on the Vision and Key Objectives were in relation to the sensitivity of the OA's location and the need to respond appropriately to local conservation areas. A significant number of respondents wished to see the Skyline Key Objective changed from requiring "no negative impacts" to requiring "positive impacts". This sentiment was also reflected in another respondent's objection to the use of the phrase "avoid any unacceptable impact". The authorities reviewed the current wording of the SPD and came to the conclusion that it is adequate as it reflects the statutory duties expected of the planning

officers who will review any application that is submitted. Officers also pointed out that in many cases the requirements set out in the SPD will improve the current situation.

- 4.3.3 English Heritage welcomed the text in the vision about heritage, but considered the term “local heritage assets” to be confusing. As a result, Officers removed the word “local”.
- 4.3.4 A significant number of respondents also raised concerns about the likely impacts of demolition, excavation and construction on local people. One respondent required legal limits to be set on the extents of such disruption, another required explicit reference to ensuring that development does not adversely affect the lives of those residents next to the OA especially with regards to potential night time working in connection with the working next to and above the railway lines. Although the SPD cannot refer to predefined legal limits, Officers agreed to revise the Key Objective on demolition, excavation and construction in order to provide greater protection to the existing population.
- 4.3.5 A smaller number of comments were received raising concerns that the vision does not place sufficient emphasis on the importance of alleviating traffic congestion in the area. Officers reviewed these concerns, but remain satisfied that the Vision and Key Objectives, along with all of the further information set out in the Transport and Accessibility Strategy (Chapter 10) are adequate in this regard.
- 4.3.6 References to open space and play space in the Vision were welcomed by Natural England. However, other respondents wished to see explicit reference to the accessibility of open spaces and others required reference to a larger open space (eg. 6ha). In response, Officers added a new clause to the Vision setting out that all public open spaces, play spaces, streets and buildings must be inclusive and accessible. However, it was not felt that the vision was the appropriate location to set out specific requirements for the quantum of open space. This is addressed in the Urban Form Strategy (Chapter 04), which the authorities consider to be adequate in this regard.
- 4.3.7 The need to protect the existing ecological areas was also raised by one respondent. Officers pointed out that this is addressed in the Environmental Strategy (Chapter 12), in particular Key Principle ENV18.
- 4.3.8 Some respondents raised concerns about density. One commented that the proposed increase in density was inappropriate, whilst another questioned why no specific mention of densities is made in the SPD. In response, Officers pointed out that, as both boroughs’ Core Strategies rely on the Mayor’s London Plan for setting the appropriate density range it was not felt necessary to replicate this in the SPD. However, in order to clarify this a new sentence was added to the housing Strategy in the SPD signposting the relevant policies in the London Plan.

4.3.9 Some respondents also raised concerns that the quality of architecture and materiality is not addressed in the vision. It was felt that this should be included in order to ensure that the development integrates sensitively into its surroundings. Officers reviewed these concerns, but came to the conclusion that the vision is adequate in this regard, as it sets out the aspiration for an environment that is of “high quality throughout, adopting the best of typical West London character and complimenting it with the best of contemporary design”.

4.3.10 NHS Kensington and Chelsea requested specific reference to health as a motivating factor or a across-cutting theme in the Vision. However, Officers felt that, as improvements to health and wellbeing cannot be secured directly through the planning system, but rather as a knock-on benefit of the delivery of all the key principles set out in the SPD, it did not need to be added to the vision which is intended only to deal with the tangible benefits that the planning system can deliver.

4.3.11 One respondent questioned the assumption that “many people will choose to both live and work in the area” as they felt that the mix of retail and office space may well create an ‘inward’ rather than an ‘internal’ job market. Having reviewed this concern, Officers remain convinced that the key Principles contained within the Employment Strategy (Chapter 06) are adequate to ensure the delivery of employment for local people. However, the authorities also recognise that there will undoubtedly be jobs that fulfil a more strategic role, but it is beyond the scope of planning to control who has access to the jobs created by development.

4.3.12 One respondent queried what is meant by the terms “world class” and “aspirational”. In order to avoid ambiguity the term “aspirational” was removed from the Vision. However, Officers decided that “world class”, which the authorities define as “the best of what we know” is adequate and should remain in the SPD.

4.3.13 A number of individual comments raising concerns about some of the specific Key Objectives were also received. Amongst these were a request for a specific reference to a swimming pool, a request for specific internal dimensions for any cultural facility and a Health Impact Assessment. As it was felt that the Vision and Objectives was not the most appropriate location to deal with such specific concerns, Officers responded to these comments by suggesting that respondents refer to specific chapters in the SPD.

#### **4.3.14 Illustrative Masterplan Images**

Capco raised the concern that it must be made explicit that all masterplan images in the SPD are for illustrative purposes only. In response, the text “for illustrative purposes only” was added to all captions.

- 4.3.15 The Metropolitan Police Authority & Metropolitan Police Services requested that the Land Use Strategy diagram should be amended to ensure that the Empress State building remains in office use. In response, Officers pointed out that this diagram is for illustrative purposes only and that later in the document, Key Principle ES1 states that the existing business floorspace in the OA should be renewed and modernised or replaced. Furthermore, although the authorities do not wish to be prescriptive about what use the Empress State building should be put to, any floorspace lost through a change of use would need to be reprovided elsewhere in the OA (Key Principle ES1) and any developer would be expected to establish and provide for the requirements of existing tenants.
- 4.3.16 In response to the illustrative masterplan drawing itself, one respondent raised concerns about the “staggered” north-south road as they were concerned that this could become a rat-run rather than a clear through-run that would relieve the Warwick Road. Another respondent expressed a desire to see a straight north south route. In response, Officers emphasised that the masterplan images are for illustrative purposes only and therefore demonstrate just one way in which north-south connectivity could be delivered. Officers remain convinced that there is value in showing a broken up north-south connection in this illustrative material as it demonstrates one way in which proposals could respond to the pattern of streets identified in the surrounding area, as required in Key Principle UF3. The SPD does not seek to achieve significant reductions in traffic on Warwick road (see paragraph 10.68 in the Transport and Accessibility Strategy).
- 4.3.17 One respondent also raised concerns about potential increase in noise and nuisance from additional vehicles running along the two linking roads shown behind Philbeach Gardens and Eardley Crescent. Again, it was highlighted that this masterplan image is for illustrative purposes only and that any proposals would be subject to the Key Principles set out in the rest of the SPD.
- 4.3.18 In response to the illustrative land use plans, concerns were raised about the co-location of residential and non residential land uses causing potential negative impacts in terms of noise and other nuisance. However, in light of Urban Design best practice, Officers came to the conclusion that the illustrative masterplan images must show mixed use development with residential and non-residential land uses located close to each other. In response to another query about the illustrative land use plans, some community uses were added.

## **4.4 Urban Form Strategy**

### **4.4.1 Overview**

A total of 376 comments were received on the Urban Form Strategy. They can be summarised under the following topic headings:

- Urban Grain and Connectivity
- Public Open Space
- Skyline
- Edges
- Streets
- Phasing

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

#### **4.4.2 Urban Grain and Connectivity**

Support was expressed for the authorities' ambition to overcome the existing severance in the OA. The emphasis that the SPD places on the delivery of a new east–west link connecting the two boroughs was welcomed by a number of respondents. However, a number of others felt similar emphasis should be placed on a new north–south connection. In particular, a number of concerns were raised about the illustrative masterplan drawings which show the north-south connections as more broken up than the east -west connections. Respondents were concerned that without a direct north-south link, congestion on the Earl's Court One Way System (ECOWS) will not be alleviated.

4.4.3 Officers reviewed the SPD in light of these concerns, but came to the conclusion that no significant changes were necessary. It was felt that there was sufficient emphasis on the need for north-south connectivity in Key Principle UF1. Furthermore, it was highlighted that the masterplan images are for illustrative purposes only, and therefore demonstrate just one way in which north-south connectivity could be delivered. Officers remain convinced that there is value in showing a broken up north-south connection in this illustrative material as it demonstrates one way in which proposals could respond to the pattern of streets identified in the surrounding area, as required in Key Principle UF3. In terms of alleviating the ECOWS, the SPD does not seek to achieve significant reductions in traffic on these roads (see paragraph 10.68 in the Transport and Accessibility Strategy).

4.4.4 Some concerns were raised about vehicular traffic rat running across the area. A new clause was added to paragraph 4.19 in order to make it clear that this should be avoided.

4.4.5 In terms of access to the OA, a small number of specific concerns were raised in relation to Cluny Mews and potential increased congestion at the junction of the A4 and Warwick Road. In response to these concerns, Officers pointed out that as Cluny Mews is the only potential point of access into the small area in the north eastern corner of the OA it was felt that reference to it must remain in the SPD. However, it was also explained that, as a result of topographical changes across the OA and the sensitive setting of St. Cuthbert's Church, it is unlikely that any access from Cluny Mews would serve the wider site.

- 4.4.6 Concerns were also raised about the potential for access into the OA from Warwick Road outside the entrance to Earl's Court Station. Some respondents were clearly worried that this could cause conflict between vehicles and pedestrians. Other respondents were worried that access in this location could lead to an increase in traffic levels on Warwick Road. In response to these concerns, Officers pointed out that the SPD does not require *vehicular* access into the OA this location, the potential access shown could be for pedestrians and cyclists only. Furthermore, Paragraph 10.71 in the Transport chapter states that if a vehicular connection were to be introduced in this location, "the road safety and urban design impacts would need to be carefully assessed... and it would need to be demonstrated that vehicular access is acceptable". In response to concerns about increased congestion on Warwick Road, respondents were referred to Key Principle TRN23 in the Transport and Accessibility Strategy which states that "all junctions from the OA onto the existing road network... should be assessed to ensure they have no unacceptable impacts on the existing road network in terms of vehicle capacity, road safety and urban design".
- 4.4.7 Support was expressed for Key Principle UF5 which encourages the creation of new publicly accessible garden squares in the OA that are inspired by the existing pattern of garden squares in the surrounding area. It was noted by respondents that the size of such spaces should reflect those in the local urban grain and be large enough to provide for a range of recreational needs. This is reflected in the SPD.
- 4.4.8 Some support was received for Key Principle UF6 which seeks to ensure that views of special local landmarks around the OA are retained or improved through redevelopment of the site.
- 4.4.9 Although it is not *required* by the SPD, decking over the railway lines to create connectivity across the site is encouraged. However, some respondents questioned the economic viability of doing so. The comments received in relation to this, along with officer responses and any amendments to the SPD are discussed in more detail below along with the comments received in relation to the suggestion of creating a linear park on top of the deck.

#### **4.4.10 Public Open Space**

The importance of the provision of new public open space within the OA was noted by a substantial number of respondents as a result of concerns about the current open space deficiency in the area, the need for recreation provision and the potential for open space to improve both air quality and land values.

- 4.4.11 A large number of respondents expressed a desire for a large, consolidated, public open space to be created within the OA. In light of this there was some support for Key Principle UF12 which requires a new 2 hectare local park. Amongst this support was the RBKC Play Partnership

who observed that the “new 2 hectare linear park can be a very valuable resource for the area... The park is large enough to accommodate different types of play for all ages” and Natural England who commented that “the provision of a new accessible local park is welcomed and supported at a minimum of 2 hectares”. However, a number of other respondents requested an increase in the quantum of open space required. For example, the Earl’s Court Society suggested a 5 - 6 ha local park would be more appropriate. Officers considered these suggestions, but came to the conclusion that the open space requirements set out in the SPD are robust. The 2 ha requirement meets the size guidelines for a local park set out in table 7.2 of the Mayor’s London Plan. Furthermore, it is important to note that this is not the only open space requirement in the SPD. In order to meet Key Principles UF13, UF14 and UF15 it is highly likely that any comprehensive regeneration proposals will need to include more than 2ha of publicly accessible green open space. In response to a number of respondents who requested that the open space requirements should be consolidated into one large open space, Officers felt that this would not guarantee the appropriate level of accessibility for all residents. Furthermore, it was felt that one large consolidated open space would prevent the delivery of other urban form aspirations such as the delivery of a fine urban grain and greater connectivity across the site.

4.4.12 The SPD goes on to suggest (but not require) that the 2ha local park could be delivered as a series of contiguous open spaces forming a linear park on top of a deck over the railway. Some respondents expressed support for this approach and recognised the benefits that it could bring. Indeed one comment suggested that the SPD should discourage any alternative approach. However, a number of other respondents challenged whether it would be the most efficient, viable and/or accessible form that the new local park could take. A number of respondents also raised concerns that a linear park may not be wide enough to accommodate the desired variety of functions and that it could be over enclosed or overshadowed by tall buildings. A small number of questions were asked about whether sufficient planting and wildlife habitats/biodiversity could be created on top of a deck structure.

4.4.13 Officers reviewed all of the comments received in relation to the possibility of a linear park and came to the conclusion that no significant changes to the SPD were necessary. First and foremost, the SPD does not require a linear park, but rather suggests that if the 2 ha local park were delivered in this form it would not prevent the delivery of any of the other Urban Form aspirations. In terms of the width of a linear park, paragraph 4.49 already states that any proposal will be expected to include open spaces that are wide enough to accommodate games courts and sports pitches, even if this results in a local park that is greater than 2ha. Officers have been advised, and remain convinced that sufficient planting can be introduced on top of a deck structure.

- 4.4.14 Support was received for all of the other Key Principles in the Public Space section of the Urban Form Chapter.
- 4.4.15 In terms of the requirements for play spaces, support was noted for Key Principle UF16, particularly the requirement for play spaces catering for differing age groups to be co-located where appropriate in order to make supervision more practical for families. The RBKC Play Partnership also noted that “providing for the 5-14 age range is crucial and is well reflected in Key Principles UF13-16.” Support was also noted for the SPD’s commitment to the provision of a variety of play spaces, both naturalistic and equipped, and for the requirement for a play strategy to be submitted with any application.
- 4.4.16 A number of respondents raised concerns that there is no provision for youth space in the SPD. In response, Officers added it to the community facilities expected under Key Principle SC6 chapter 9 of the SPD.
- 4.4.17 With regard to disabled access to public open spaces and play spaces, the Hammersmith and Fulham Disability Forum requested additional references to the need for all public open spaces to be inclusive and accessible and the need for open spaces and play spaces to serve the needs of disabled children. Officers considered these requests and came to the conclusion that the SPD needs to encourage inclusive accessibility in all regards, not just in relation to public open space. Therefore, the Vision and Objectives chapter was revised to make this explicit. A further clause was also added to paragraph 4.55 in the Urban Form Strategy setting out the expectation that any proposals for open space and/or play space must consider the needs of disabled children and children with other special needs.

#### **4.4.18 Skyline**

A large number of comments expressing reservation or objection were received in relation to the impact that any new development will have on the local townscape and skyline. Respondents were clearly keen to ensure that new buildings will not be too tall and/or out of context with the surrounding area, with many questioning the need or strongly objecting to any new tall buildings on the site which would exceed what is seen as the prevailing Victorian/Edwardian storey heights.

- 4.4.19 Of particular concern to many respondents was the potential impact on Brompton Cemetery, which is clearly valued by many as a local amenity as well as a working cemetery, conservation area and the setting of listed buildings. Particular objections were expressed to the aspiration, as established in the Conservation Area Proposals Statement for the cemetery (1999), to improve the enclosure along its western edge. Respondents argued that this is not desirable as it could restrict the panoramic views from the cemetery and disturb the peaceful environment that it currently offers. Others acknowledged that it could be achieved, but that it would have to be approached in a very sensitive manner that is



consistent with the enclosure found around the other edges of the cemetery.

- 4.4.20 Further concerns were raised about the impact on the townscape and skyline of other surrounding conservation areas. It was requested by one respondent that as well as identifying the importance of conservation areas, longer distance views (particularly those identified in the RBKC Building Heights SPD) should also be preserved or enhanced.
- 4.4.21 All comments, reservations and objections received in relation to the impact of any new development on local conservation areas and heritage assets were considered. However, Officers came to the conclusion that the SPD, along with the Townscape and Visual Analysis SPD Supporting Evidence Document, establishes a sufficiently robust framework against which the impact of any application could be assessed and therefore no significant changes were required. It was however, was decided that a new sentence about the importance of local views as well as local conservation areas should be added to the introduction to the Urban Form chapter.
- 4.4.22 Some support was expressed for Key Principle UF21 which seeks to ensure that there are no negative impacts on any of the views identified by the authorities in the Townscape and Visual Analysis SPD Supporting Evidence document. However, other respondents questioned whether Key Principles UF19, UF20 and UF21 should seek to ensure that development has “positive impacts” rather than seeking to avoid any “negative” ones. However, as the current wording of these Key Principles reflects the statutory duty of the Officers who will be responsible for assessing any application that is submitted, it was decided that no change was necessary. Capco expressed concern that, whilst they acknowledge that there are clearly buildings and spaces of interest in and around the OA, it is too prescriptive to set out a list of townscape and views to be protected. Officers considered this, but came to the conclusion that, as the views listed in the Townscape and Visual Analysis SPD Supporting Evidence Document have been identified as the most significant in the OA's surroundings, it remains an absolute requirement of the SPD that these should be analysed as part of any application(s) submitted.
- 4.4.23 A number of respondents questioned why the SPD does not set a specific cap on the number of storeys or the building heights that would be acceptable for new development. This was reflected in English Heritage's comments. Whilst they welcomed the intention behind the Key Principles in the SPD that seek to control the location, distribution and design of tall buildings, they also expressed concerns that the approach taken is not sufficiently plan led and recommended that the authorities should develop a more specific vision of the impact that scale could on the surrounding environment. In contrast however, the DRP suggested that SPD should not be too prescriptive in this regard and that it should be left to the developer to make the case for tall buildings. Officers considered these

views and came to the conclusion that it would be too prescriptive for a strategic planning document like the SPD to establish specific building heights. Officers therefore remain convinced that the framework of Key Objectives and Key Principles established in the SPD is sufficiently robust to assess any proposal against.

- 4.4.24 There was some support for the authorities' aspiration to cluster new tall buildings close to the Empress State building but a larger number of respondents opposed it. Some saw the Empress State Building's 'stand alone' status as an attractive feature and others suggested that, rather than reducing the visual impact of the Empress State building, integrating it into a cluster would actually result in it appearing more dominant on the skyline. The Design Review Panel (DRP) raised concerns that a cluster of tall buildings could coalesce into an amorphous and bulky silhouette when viewed from a distance and suggested that the SPD should emphasise the importance of ensuring that the upper parts of tall buildings are variable, with plenty of sky visible between them. A small number of respondents requested clarification on what was meant by the "London wide public function" that the authorities feel a cluster of tall buildings could mark. Capco felt that a cluster of tall buildings could simply mark the presence of the OA itself and therefore reference to a "London wide public function" is unnecessary.
- 4.4.25 The authorities remain convinced that a cluster of tall buildings in the vicinity of the Empress State building could be successful and the wording of the SPD in relation to this issue has been clarified. Further wording has also been added to reflect the concerns raised by the DRP and make it clear that any cluster of tall buildings should not coalesce into an amorphous wall of development. Those respondents who asked for clarification of the London –wide public function were referred to the Culture Strategy in chapter 8 of the SPD which requires "a new strategic leisure, cultural and visitor destination" in the OA.
- 4.4.26 Support was noted for the guidance set out in relation to the design of tall buildings, particularly in Key Principle UF24. This included support from the DRP who made a number of recommendations to strengthen it. In response, the text guiding the design of tall buildings in the SPD has been reordered and in some cases rewritten to ensure that it achieves the authorities' aspirations. Capco expressed concern that this guidance may be too prescriptive, but in light of the DRP's comments, Officers came to the conclusion that this was not the case.
- 4.4.27 A number of respondents indicated that they were in agreement with or expressed strong support for the guidance in paragraph 4.59 which states that "the location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape".

4.4.28 More general responses to the potential for tall buildings in the OA questioned whether high rise residential buildings are aspirational, or whether they are essentially undesirable both socially and aesthetically. Some respondents suggested that high rise living is not suitable for families. Officers considered these concerns, but pointed out that there are many tall buildings in London that are aspirational, including the tower at Tarbard Square in Bermondsey, Ontario Tower at Docklands, The Barbican Towers, Knightsbridge Barracks Tower and Shearsmith House.

4.4.29 General concerns were raised that tall buildings within the OA could result in a loss of sunlight for existing residents. In response, Officers pointed out that Key Principle UF28 requires the privacy, daylight and sunlight of existing and future buildings to be respected. This was changed to read “all” existing and future buildings so that it is clear that it does not only apply to buildings on the edges of the OA.

#### **4.4.30 Edges**

A large number of comments received raised concerns that buildings proposed for the edges of the OA would be too high and would overshadow existing streets or properties and could result in a loss of sunlight, daylight and privacy for existing residents. In response, Officers pointed out that Key Principle UF28 in the SPD requires the privacy, daylight and sunlight of existing and future buildings to be respected.

4.4.31 Respondents were also clearly concerned that new development should integrate well into the existing scale of the surrounding context, particularly in relation to the existing Victorian residential buildings on the OA’s edges. Having reviewed these comments, Officers felt that the Key Objective Key Principles established and in the Edges section of the Urban Form Strategy formed a sufficiently robust framework against any application could be assessed.

4.4.32 Strong support was expressed for Key Principle UF29 and the guidance that follows it in which ‘back to back’ rear gardens are encouraged. A small number of respondents requested specific dimensions for rear gardens. Other respondents raised concerns that the security of and access arrangements to existing rear gardens should be retained. Although specific dimensions were considered too prescriptive for the SPD, the text was revised to clarify the boundary and access requirements.

4.4.33 The DRP expressed support for the SPD’s suggestion that predominantly commercial buildings should be located along the West Cromwell Road frontage. They also highlighted the possibility that a very tall building could be located here. However, this is in contrast to the views of English Heritage who registered reservations about the suggestion that relatively tall elements could be located on this edge of the OA. Officers remain convinced that while there is no potential for a very tall element on the West Cromwell Road frontage, some relatively tall buildings could be located here. Any building in this location will be subject to all of the

relevant Key Principles in the SPD, including Key Principle UF21 which requires it to have no negative impact on any of the views identified in the Townscape and Visual Analysis and Key Principle UF27 which requires development to preserve or enhance the character, setting and appearance of any listed buildings or conservation areas around the edges of the OA.

#### **4.4.34 Streets**

Some respondents were concerned about the potential over enclosure, and therefore overshadowing, of streets and open spaces within the OA. Some respondents, including the DRP, welcomed the emphasis on a street enclosure ratios in the SPD. The DRP also accepted that this must allow for some variation to avoid monotony and to create delight and suggested that guidelines should be kept to a minimum where the usual criteria for good design can be applied. Capco raised concerns that the SPD is too prescriptive in terms of widths and ratios of both streets and open spaces. Having considered all of the comments received on street ratios, Officers came to the conclusion that the guidance in the SPD is not too prescriptive, and that there is sufficient flexibility thanks to the clause in paragraph 4.90 that reads “any street that breaks this rule will require significant urban design justification”.

4.4.35 Key Principles UF34 and UF35, which seek to ensure an appropriate roofscape for any redevelopment were welcomed by a small number of respondents including English Heritage.

4.4.36 Some respondents questioned the general approach taken in the SPD that, where appropriate, cyclists should be accommodated within the carriageway rather than in dedicated cycle lanes. These respondents raised concerns about potential conflict between cyclists and motor vehicles. It should be noted that the SPD neither requires nor precludes the use of cycle lanes. As current Urban Design best practice is to accommodate cyclists within the carriageway rather than cycle lanes Officers decided that no change of approach was required. However, in order to alleviate concerns in this regard, reference to “cycle friendly streets” was added to paragraph 4.112 of the SPD.

#### **4.4.37 Phasing**

The DRP felt that, as it is almost impossible to predict phasing sequences, the SPD should concentrate on defining illustrative development ‘parcels’ rather than sequential phases. The SPD was amended in line with this comment. Concerns were raised by another respondent that the north-south connection was not shown during a sufficiently early phase of development. This was addressed by removing any reference to sequential phasing and referring instead to “illustrative development parcels” that could come forward in any suitable order. Capco felt that the phasing details were too prescriptive for an SPD and that it could prove inflexible. Again, this was addressed by removing any reference to

sequential phasing and referring instead to “illustrative development parcels”.

4.4.38 Another respondent raised concerns that future phases may get delayed or indeed may never happen. This respondent recognised that the benefits of redevelopment will only be to the best advantage of residents once comprehensive regeneration is complete. Chapter 13 on Phasing and Section 106 has been amended to introduce two new Key Principles that deal with this issue in more detail. Another respondent questioned whether it is essential to demolish the existing housing estates in order to deliver the Urban Form aspirations. Officers have given full consideration to this issue throughout the entire process of producing the SPD and Development Capacity Scenarios and feel that comprehensive redevelopment has the potential to deliver optimum benefits.

#### **4.4.39 Other Comments**

Some respondents expressed a belief that the SPD gives insufficient attention to heritage assets in and around the OA and requested that they should be given greater emphasis. This has been addressed by giving greater prominence to the Heritage Assets section of the Site Context chapter (Chapter 02).

4.4.40 A large number of comments raised concerns that the use of materials is not addressed in the SPD and that it should be a requirement that all materials reflect those found in the existing context. Similarly, a number of respondents also raised concerns that the SPD does not seek to control or guide the architectural quality or design of any new buildings. Some respondents made specific reference to the design of any building that is intended to replace the existing façade of Earl’s Court 1 (EC1), either hoping to see the existing frontage retained or expressing a preference for a new building inspired by the existing Art Deco façade. Officers considered all of these comments, but felt that including specific requirements for materials or architectural styles would be too prescriptive for a strategic planning document like the SPD. Each application that is submitted will be considered on its own merits in regard to such detailed issues.

4.4.41 The Hammersmith and Fulham Disability Forum expressed support for the references made to selected access standards in the SPD, but noted that these are not comprehensive and requested further reference to acceptable gradients, step free routes and sufficient evacuation lifts in new buildings. Officers considered these issues but came to the conclusion that they are too detailed for inclusion in a strategic planning document like the SPD. As they can all be found in other documents like Building Regulations, it was not considered necessary to repeat them in the SPD at the risk of unnecessarily lengthening the document.

## **4.5 Housing Strategy**

### **4.5.1 Overview**

A total of 2,135 comments were received on the Housing Strategy, summarised under the following topics.

- Estate Regeneration
- Housing Density
- Tenure and Housing Mix
- Amenity Space
- Accessible Housing

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

### **4.5.2 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.

4.5.3 There was 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. The majority of comments received were submitted as standard letters, which outlined the key areas of concern as being the disruption to residents, density, lack of additional social rented housing, case for estate regeneration and lack of mention of residents' plans to take over the estates. A number of consultees recognised the benefits that estate regeneration could bring in terms of creating more mixed and balanced communities.

4.5.4 The greatest area of concern was in relation to the case for estate regeneration. Consultees questioned the validity of the Estates Regeneration Economic Appraisal which was produced in support of the revised draft joint SPD. Consultees also questioned whether the existing deprivation of the estates and the poor quality environment within the estates were legitimate reasons to consider redeveloping the estates. A number of consultees felt that the use of the word 'regeneration' was inaccurate when what was in fact being talked about was 'redevelopment'. In these instances, the wording has been altered from 'regeneration' to 'redevelopment'.

### **4.5.5 Residential Density**

Many consultees raised concerns about the lack of clarity in the SPD on the issue of density. Consultees wished to see the SPD revised to be explicit on what an acceptable density would be for development in the OA. In response, the SPD has been amended to include a sentence in the introduction to the housing chapter, signposting the relevant policy in the London Plan. A number of consultees raised concerns about the density

of development proposed, although these comments appeared to relate more to the planning applications than the illustrative drawings in the SPD.

#### **4.5.6 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. Consultees were generally keen to see a mix of tenures across the OA. One consultee consider that text should be added stating that the entrance arrangements to residential properties should be tenure blind. This has been added to Key Principle HO9. There were also many comments expressing a desire for more affordable family housing and larger residential units, particularly units for those with extended families and amendments have been made to the SPD to require developers to consider this. 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 was also raised.

#### **4.5.7 Amenity Space**

Many respondents voiced strong opinions on the need for quality communal and private amenity space associated with new housing. 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.

#### **4.5.8 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.

### **4.6 Employment Strategy**

#### **4.6.1 Overview**

A total of 46 comments were received on the Economic Development Strategy, summarised under the following topics:

- Business provision
- Employment and training

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

#### **4.6.2 Business Provision**

Consultees were generally supportive of the strategy for business provision. Generally, consultees that wished to see changes to the text,

wanted to see a greater clarity on the delivery of business space. The key areas of concern are set out below.

- 4.6.3 A couple of consultees were worried by the possible loss of the Empress State building and sought amendments to the SPD to put in place restrictions on the use of the building. The SPD does not look to retain the Empress State building in business use; however Key Principle ES1 does require developers to establish the needs of existing tenants reprovide for these needs in development proposals. A related concern was that new business floorspace provided in the OA might at a later date be allowed to change to residential and it was clarified that planning conditions would be put in place to prevent this.
- 4.6.4 A number of consultees were concerned by the potential impact of new business floorspace on existing provision in the hinterland of the Opportunity Area. A few respondees wanted greater clarity on the type of jobs that would be created in terms of employment skills. Officers clarified that at this stage, it would be difficult to say, but that a range of jobs targeted an different skill levels would be expected.
- 4.6.5 One consultee felt that 7,000 additional jobs should be a maximum rather than a minimum. Officers responded that this would allow developers to provide employment significantly below that figure and that job creation is a key objective for all three authorities.
- 4.6.6 There was concern about the demolition of the existing business centres and the impact that this could have on surrounding businesses, which officers felt was already covered by Key Principle ES6 and the Culture Strategy.
- 4.6.7 Some consultees wanted a greater degree of surety about the number of jobs that would be for local people and suggested defining a catchment and proportion of jobs that would be allocated for local people. It was clarified that such control would be beyond the realms of planning but that the authorities felt that Key Principles ES7-ES9 set a framework which would ensure that as much as possible would be done in order to get local people access to employment. a request was put in for live-work units but officers felt that given their chequered history, it would be wrong for the SPD to explicitly require their provision, but that the SPD does not preclude their provision.
- 4.6.8 One consultee felt that there should be greater flexibility in terms of the phasing of business floorspace provision. However, the authorities felt that no change was necessary as the authorities felt strongly that no more than half of the business floorspace should be provided in early phases in order to protect the viability of other business centres in West London.

#### **4.6.9 Employment and Training**



Consultees were generally receptive to the employment and training section of the Business Strategy. The key areas of concern are set out below.

4.6.10 One consultee felt that special consideration should be given to the training needs of people affected by the closure of the Earl's court Exhibition Centres. This has been added to the text under Key Principle ES9. One consultee wanted the SPD to include additional detail on partnership working and target setting. this is dealt with in the boroughs' joint Employment and Training Code, which is referenced in the SPD. It was not felt necessary to replicate this detailed guidance in the SPD. Additional detail was also requested on the types of courses that would be provided at the construction training centre and recruitment and jobs shop, which was also considered to be far too detailed a topic to cover in the SPD and would be a result instead of more detailed discussions closer to the delivery of any facility, between the developer and the council's economic development teams. It was requested that employment opportunities should be targeted at young offenders. This has been added to the text under Key Principle ES8.

## **4.7 Retail Strategy**

### **4.7.1 Overview**

A total of 38 comments were received on the Retail Strategy, summarised under the following topics:

- Impact on existing businesses;
- Comparison retail; and
- North End Road Market.

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

### **4.7.2 Impact on Existing Businesses**

By far the greatest amount of responses related to the impact of new retail on the vitality and viability of existing centres. Officers considered that generally the fears of respondees would be allayed by the Key Principles in the Retail Strategy, which require the submission of a Retail Impact Assessment by any developer (RS3) and look to control the nature of new retail through a Retail Management Plan (RS6).

### **4.7.3 Comparison Retail**

Generally, consultees were supportive of the strategy for comparison retail within the OA. There was some concern that new comparison retail might undermine existing retail centres, particularly the northern parts of Fulham Town Centre. Officers felt that comparison retail along North End Road would strengthen the northern parts of Fulham Town Centre, through increased footfall and therefore no change was proposed to the SPD. Conversely, there was concern that not enough comparison retail within the OA was being provided for. It was felt that there should be greater

flexibility without crass distinctions between convenience and comparison. The authorities felt it important to be explicit that comparison retail should remain to be focussed on North End Road and therefore no change was proposed to the SPD. Consultees questioned why the SPD had not identified the need for an anchor store. Figure 7.1 had identified the need for an anchor store but this had not been replicated in the text. In response to consultees the text has been amended in order that developers explore the potential for an anchor store on North End Road under Key Principle RS1.

#### **4.7.4 North End Road Market**

There was concern about the proposals to relocate North End Road Market; however, there was also an acknowledgement that the market is failing in its current location and something has to be done to improve its viability. Consultees wished to see an audit undertaken of the needs of existing market traders and this to be taken account of when designing the new market.

## **4.8 Culture Strategy**

### **4.8.1 Overview**

A total of 217 comments were received on the Culture Strategy summarised under the following topics:

- A New Cultural Destination
- Public Art
- Hotels

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

### **4.8.2 A New Cultural Destination**

A significant number of comments, many of which submitted as part of a petition, wanted the exhibition centres to be protected. Respondents highlighted: the importance of the exhibition centres in shaping Earl's Court as a cultural destination; the contribution that these make to the local economy; and considered that Earl's Court 1 should be listed. In addition to this, the exhibition industry stated that there is still demand for this type and size of exhibition space in Earl's Court, and would like the SPD to include requirements for affordable exhibition space.

4.8.3 No changes are proposed, as the SPD already requires development to 'create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court brand'. The SPD considers that this cultural destination, together with consideration for existing businesses through the Employment Strategy (Key Principle ES6), will benefit the local economy. English Heritage have already considered the heritage value of the Earl's Court 1 and decided to give it 'immunity from listing' until 2014. The list of case studies in the SPD has been reviewed. As the London Plan and borough core strategies require a

residential led, mixed use development, the replacement of equivalent exhibition space as the existing exhibition centres in one facility is considered unreasonable, especially considering the large supply of exhibition space in London. There is some inconsistency between para 8.11 and table 8.1, which will be corrected. Event and exhibition providers can recover the cost of venue hire from ticket sales, whereas smaller creative businesses and sole traders require affordable studio and workshop space to set up businesses.

#### **4.8.4 Public Art and Hotels**

Very few comments were received on public art, although the SPD has been revised in response to a comment requiring community involvement in public art. The SPD has also been revised in response to a comment requiring the consideration of hotel provision to meet a range of markets, such as leisure, tourism and business. In response to a comment about the accessibility of hotel rooms, the SPD has been revised to be explicit that this means 'wheelchair' accessibility, in accordance with the London.

## **4.9 Social and Community Facilities Strategy**

### **4.9.1 Overview**

A total of 86 comments were received on the Economic Development Strategy, summarised under the following topics:

- General;
- Education;
- Health;
- Sports and Leisure;
- Police Facilities; and
- Community Space.

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

### **4.9.2 General**

Generally, consultees were pleased with the requirements set out in the Social and Community Facilities Strategy. There was a degree of concern that the exact quantum of development coming forward is unknown and that it would therefore be difficult to say what sort of provision would need to be made. It was clarified that although this would be the case, facilities such as schools and health centres would increase in size in relation to the population, whereas facilities like the community hub have a fixed capacity. Generally it was felt that the wording of the key principles could be strengthened and the key principles have been amended in order to reflect this request.

### **4.9.3 Education**

The greatest concern was the lack of capacity in existing educational infrastructure and the pressure that development might place on these facilities. The SPD requires development to provide the necessary

floorspace and fit outs costs to cater for the needs arising from any development in the OA and therefore, no amendment to the SPD was necessary. It acknowledgment of this existing deficit in capacity, some consultees felt that development should provide educational capacity not just to cater for the needs of development, but also to address the existing deficit in capacity. It was clarified that this would go beyond the Community Infrastructure Levy regulations and that deficit in capacity is a matter for the borough's education department, not any potential developer of the OA.

#### **4.9.4 Health**

Generally the provision of a new health facility was welcomed by consultees. There was a degree of concern that the existing facility at 82 Lillie Road would be lost through development proposals. Although in the OA, it is not proposed that the facility at 82 Lillie Road would be redeveloped. Were proposals to come forward that sought to redevelop the facility at 82 Lillie Road, the health facility would need to be reprovided in a location near to the existing facility. In relation to the new health facility, one consultee was concerned that the new facility might be run by a private provider and would not be affordable. In order to clarify the key principle, it has been stated that the health facility being sought is a NHS health facility. Further clarity was requested in relation to what sort of facilities an integrated primary care centre would provide. This clarity has been added to the text below Key Principle SC2. The PCT requested that a new key principle be added relating to the need for any developer to submit a Health Impact Assessment. This has been added to the SPD, along with text relating to what sort of issues this Health Impact Assessment should cover.

#### **4.9.5 Sports and Leisure**

The provision of affordable sports provision was welcomed. Some consultees wanted clarity over the affordability, requesting that access be provided to the facility free of charge. It was stated that the affordability of the facility would be a matter for detailed Section 106 discussions and therefore could not be set out in the SPD. A number of consultees expressed a desire for the new leisure centre to provide a swimming pool. It was clarified that the authorities considered swimming pool provision in the area to be adequate, but that the SPD would not preclude the provision of a swimming pool and that were one to be provided, the authorities would look to provide affordable access to it. A number of consultees also requested greater clarity over what sort of outdoor space for youths the SPD requires. It was felt that the requirements as set out under Key Principle SC3, along with Key Principle UF16 in the Urban Form Strategy, would be sufficient hooks off which to look to secure outdoor spaces for youths.

#### **4.9.6 Police Facilities**

The Metropolitan Police requested that the wording of the key principle be changed from 'police shop' to 'community policing facility' in order that the

wording be future proofed. This change has been made. A further request was made to add a new bullet to Key Principle SC5, safeguarding the use of the Empress State building for policing. Officers do not wish to prescribe the use of the Empress State building, but as per the requirements of Key Principle ES1, the needs of the Metropolitan Police would need to be taken account of through development proposals, were there any plans to change the use of the Empress State building in future. Other consultees welcomed the requirements in relation to closed circuit television.

#### **4.9.11 Community Space**

Generally consultees welcomed the requirement for a that the community hub would be too big and difficult to lease. The size of the facility was based on evidence provided by the borough's voluntary and third sector departments and therefore, no change to the SPD is proposed. Concerns were raised that the loss of the existing community spaces on the West Kensington and Gibbs Green estates does not appear to have been considered. In order to rectify this, officers have inserted text within the key principle and commentary requiring the provision of temporary or permanent facilities of at least equivalent size, before the existing facilities on the estates can be redeveloped. A number of additional uses were requested to be provided in the community hub - space for worship, a children's centre and space for youths. All three have now been added to the key principle and commentary. One consultee wanted it clarified that as well as being accessible to all it should be clarified that the facility should be designed so as to provide for diverse cultural needs. This has now been reflected in the commentary.

## **4.10 Transport and Accessibility Strategy**

### **4.10.1 Overview**

A total of 345 comments were received on the Transport and Accessibility Strategy from 82 respondents, summarised under the following topics.

- Transport Capacity;
- Walking and Cycling;
- Public Transport; and
- 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.

### **4.10.2 Transport Capacity**

A number of respondents questioned whether the Strategic Transport Study had included the cumulative impacts of development outside of the Opportunity Area, in particular those along Warwick Road. The study was underpinned by the London Transportation Studies model and its assumptions for areas where there are significant development proposals were checked. The model assumes growth in excess of that likely to be generated by the developments referred to. Key Principle TRN1 was

amended to include reference to the need to assess the cumulative impact of development on the transport networks.

#### **4.10.3 Walking and Cycling**

Many respondents raised the issue of poor pedestrian accessibility within and immediately surrounding the Opportunity Area. The SPD was amended to include a general requirement to improve connections to the north and south of the site. Narrow footways and pedestrian safety issues on surrounding roads were raised, especially associated with pedestrian crossings. Improvement to existing and provision of new pedestrian facilities were suggested by many respondents, including many who commented on the need to improve pedestrian crossing facilities at the A4 / Warwick Road junction. Many respondents requested more detail and responses to problems at particular locations. The SPD is not the appropriate location for detailed discussion of crossings or junctions.

4.10.4 Many respondents referred to the need for cycle lanes on the streets. The SPD supports a broader approach to cycle safety within the site whereby all streets are designed to ensure traffic speeds are minimised and walking and cycling prioritised. The SPD is not the appropriate location to set out the detailed design of streets or detailed amendments to existing streets to improve cycle safety.

4.10.5 Some respondents were generally supportive of the key principles with respect of walking and cycling and welcomed the overall approach to walking and cycling set out in the SPD.

#### **4.10.6 Public Transport**

A large number of respondents raised the issue of public transport capacity and the impact the redevelopment of the Opportunity Area will have on existing London Underground and rail services in particular. 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 and felt that conditions could become dangerous within the stations if additional passengers are added. There was some support for the key principles in regard to the improvements proposed at the stations but many comments sought more detail and more extensive improvements, with some seeking an additional station within the Opportunity Area. Additional text has been added to require a second access to West Brompton station should such an access be feasible following investigation. Crowding and capacity has been assessed at the stations and is covered extensively in the Strategic Transport Study, which informs the findings of the SPD. The mitigation measures set out are sufficient to accommodate background growth and demand from development.

4.10.7 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 and a reference to community transport schemes has been added.

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

A significant number of 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 development and were sceptical of the improvements set out in the SPD. Some respondents also suggest there was a need for a major overhaul of the road network and suggested the introduction of a traffic by pass along the route of the West London Line or introducing two-way working on the Earl's Court One Way System. The SPD sets out the findings of the Strategic Transport Study, namely that background and development traffic can be accommodated on the highway network but that there are some localised increases in congestion and delay that are unacceptable. It is for development proposals to demonstrate how these concerns can be overcome.

4.10.9 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 and to ensure there is no overspill parking demand on local streets.

### **4.11 Energy Strategy**

#### **4.11.1 Overview**

A total of 8 comments were received on the Energy Strategy.

4.11.2 One respondent considered that the SPD should exceed the environmental performance targets, which are already set in higher order planning policy. In response to one comment, the SPD has been amended to ensure that energy assessments consider the 'whole life' carbon emissions. EH require that buildings in conservation areas are given preference for benefiting from excess energy from the decentralised energy system. As the OA is bounded by 19 conservation areas, this is very likely. However, the SPD shouldn't prioritise buildings, as this should be considered in terms of demand for heat and energy and nature of any existing supply.

4.11.3 Several comments by Capital and Counties requested flexibility in the Key Principles. The authorities' consider that the SPD has been drafted to reflect the policies in the London Plan and borough Core Strategies.

## **4.12 Environment Strategy**

### **4.12.1 Overview**

A total of 142 comments were received on the Environmental Strategy summarised under the following topics:

- Demolition, Excavation and Construction Impacts;
- Flood Risk and Sustainable Water Management;
- Waste Management;
- Land Contamination and Remediation;
- Air Quality;
- Noise and Vibration; and
- Ecology and Biodiversity.

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

### **4.12.2 Demolition, Excavation and Construction Impacts**

A significant proportion of the respondents raised concerns that the demolition, excavation and construction would impact on existing residents, in terms of air quality, noise and vibration and construction traffic. Several respondents were also concerned about night time and weekend working, especially as some night time working will be required over the live railway lines. The SPD contains a number of Key Principles protecting new and existing residents from the impacts of demolition, excavation and construction. However, this will be made explicit in the Key Objective and several of the Key Principles will be revised to give the surrounding community greater protection from all impacts. The SPD will also be revised to ensure that when evening and weekend work is required, it is kept to a minimum, controlled by the boroughs environmental health and the surrounding community are given prior notice.

4.12.3 This section of the SPD has also been revised to include consideration of the archaeological value of the OA, as requested by English Heritage.

### **4.12.4 Flood Risk and Sustainable Water Management**

A number of respondents were concerned that development would increase the risk of flooding, especially given the limited capacity in the Counters Creek Sewer. The SPD already contains a number of Key Principles (ENV5 to ENV9) to ensure suitable flood risk assessment and flood risk mitigation to accommodate development, although this section will be revised to define the flood zones (in para 12.28) and include requirements to maintain green / brown roofs (12.47). In response to comments from the Environment Agency (EA) and Thames Water (TW), the SPD will also be revised to require development to: consider the impact of climate change (ENV5 and para 12.34), require developers to consult with the EA and TW (ENV5), promote gravity in place of mechanical pumps (para 12.36), clarify requirements for flood risk assessments in accordance with PPS25 (ENV6 and para 12.38) and



amend ENV9 to prioritise meeting Greenfield run-off rates or better in accordance with the London Plan's drainage hierarchy.

#### **4.12.5 Waste Management**

There were minimal comments on the requirements for waste management, although para 12.60 has been revised to ensure that this does not impact on residential amenity.

#### **4.12.6 Land Contamination and Remediation**

There were no key issues or themes emerging from the consultation on land contamination.

#### **4.12.7 Air Quality**

Many respondents commented on the poor air quality within and surrounding the OA, mainly caused from the traffic on the surrounding roads. Respondents requested requirements to improve air quality. The impact of construction traffic is considered within 'the Demolition, Excavation and Construction section'. In accordance with the London Plan, the SPD requires development to be air quality 'neutral' or improved which includes consideration of traffic pollution. The SPD cannot exceed requirements in higher order policy. Para 12.83 has been revised to ensure that the Low Emission Strategy compares current and future emissions. The SPD also sets out a number of ways in which the impacts of traffic can minimise air pollution, such as providing electronic charging points, limiting on site car parking and promoting sustainable travel plans.

4.12.8 In response to one comment, figures 12.6 to 12.8 have also been revised to include a wider area and the source of air emission data has been included in 12.78.

#### **4.12.9 Noise and Vibration**

Respondents, especially from surrounding areas, expressed strong concern at the potential impact of noise and vibration from demolition, excavation and construction, especially over a long period of time. This is considered under 'demolition, excavation and construction', which has been revised to offer greater protection to the new and existing population. In response to one comment, para 12.95 has been revised to define 'noise sensitive uses'.

#### **4.12.10 Ecology and Biodiversity**

Several respondents required development to specifically protect the existing Site of Nature Conservation Importance (SNCI) along the west side of West Brompton Station, which is consistent with Key Principle ENV18. In response to several comments the SPD will be revised to explicitly protect the biodiversity of adjoining SNCIs, namely Brompton Cemetery. In response to a comment from Natural England, ENV19 has been revised to ensure that the Ecological Impact Assessment includes an ecological survey.

## **4.13 Phasing and Section 106 Strategy**

### **4.13.1 Overview**

A total of 17 comments were received on the Phasing and Section 106 Strategy, summarised under the following topics:

- General;
- Phasing; and
- Section 106 contributions.

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

### **4.13.2 General**

Generally there was strong endorsement for the requirements outlined in the Phasing and Section 106 Strategy. One consultee suggested that an additional key objective be added requiring development to minimise damage to existing community life, health and environment whilst promoting shared facilities and community cohesion. It was considered that these issues were dealt with under other key objectives in the SPD and that the objective did not appear to relate to phasing or Section 106 requirements. A request was put in that additional text should be added clarifying that in addition to the key objectives and key principles in the SPD, development would need to accord with the boroughs' Core Strategies and the Mayor's London Plan. This additional text has been added.

### **4.13.3 Phasing**

It was generally felt that greater detail should be provided around the authorities' strategy towards phasing. A number of consultees felt that it should be clarified that a mix of land uses should be provided at all phases. It was clarified that the authorities would not expect all land uses to be provided as part of every phase; however phases would need to be self sufficient in terms of their planning contributions towards environmental improvements, infrastructure and land uses and that this would be clarified through the addition of a new key principle (PS3). Some consultees wished to control development such that contributions at each phase should be honoured before each subsequent phase can commence. The authorities concurred that clarification on this was necessary and that a new key principle (PS4) would be added setting out that triggers would be used to restrict how much development/occupation could take place before certain infrastructure and land uses have been provided. In addition, recognising the current economic climate, consultees felt that there would also be clarity on the phasing and plans put in place in case that the phasing is modified in future. New wording has been added to the new key principle PS4 stating that contingency plans should be provided should the comprehensive redevelopment of the OA not be completed as envisaged at the time any permission is granted.

#### **4.13.4 Section 106 Contributions**

It was recognised that the long list of contributions in the Phasing and Section 106 Strategy reflects the Section 106 asks set out in the other chapters of the SPD. Changes have been made to the long list in the Section 106 chapter to reflect changes made elsewhere in the document. One consultee was concerned that there appeared to be a huge amount of commitments in the long list of Section 106 asks, but no idea of whether they are attainable. It was clarified that the SPD is supported by a viability summary, which demonstrates that there would be a substantial Section 106 pot and that the exact Section 106 package would be dependent on discussions between any developer and the authorities but that the authorities will ensure that as much as possible is done in order to ensure that each of the Section 106 asks outlined in this SPD are addressed.

### **4.14.1 General Comments**

#### **4.14.1 Overview**

A total of 143 general comments were received and summarised below. A significant number of these comments were in support of the revised draft SPD and several comments objected to the contents of the revised draft SPD.

4.14.2 A number of respondents raised concerns about the increased number of people living and working in the OA, would have on the environment, transport network and social infrastructure. The SPD already contains a number of Key Principles to control the impact of development on the environment (Energy Strategy and Environmental Strategy), transport network (Transport and Accessibility Strategy) and social infrastructure (Social and Community Facilities). Any requirements in the SPD must be related to the impact of that development.

4.14.3 The Vision of the SPD has been revised to include specific reference to making public space and buildings 'inclusive for all', as required by several comments.

4.14.4 English Heritage raised a number of comments on the revised draft SPD which are considered under the chapters and supporting documents. In terms of general comments, EH were generally supportive of the progress made, although required the document to better control the impact of development on the setting of adjoining heritage assets. UF19 and UF20 have been revised in response to this.

4.14.5 Several comments questioned how the comments on the first draft SPD have informed the production of the revised draft SPD. This is addressed in para 1.1 of the SPD, which states that 'A Statement of Consultation, showing how comments made on [the first] draft have been taken into account in this revised draft, is published alongside this SPD'.

- 4.14.6 A number of respondents questioned whether an Area Action Plan (AAP) should have been produced instead of a Supplementary Planning Document (SPD). The authorities have considered that an AAP is not necessary as up to date strategic policies for the Opportunity Area are already set out in the London Plan and Borough Core Strategies.
- 4.14.7 As with the Introduction, a number of respondents questioned the weight that could be afforded to the SPD should planning applications be determined in advance of the adoption of the SPD. As such, several respondents requested that any planning applications in the OA are postponed until the SPD is adopted. The authorities cannot control when planning applications or revisions to planning applications are submitted. Furthermore, the authorities cannot require planning applications to be withdrawn and cannot unreasonably delay determination of planning applications.

## **SPD SUPPORTING DOCUMENTATION**

### **4.15 Sustainability Appraisal**

#### **4.15.1 Overview**

A total of 9 comments were received on the Sustainability Appraisal. In response to comments by English Heritage, the SA, and in particular paragraphs 2.2.3 and 2.2.4, will be revised to highlight the importance of the heritage value of the surrounding area, including the heritage value of Brompton Cemetery and listed buildings.

4.15.2 English Heritage and the Hammersmith and Fulham Historic Buildings Group request that the SA refers to PPS5, including consideration of designated and undesignated heritage assets, and includes consideration of Parks and Gardens of Historic Interest (Brompton Cemetery) or archaeology, which have been incorporated in the final SA.

4.15.3 In response to a comment by the Hammersmith and Fulham Historic Buildings Group, Sustainability Objective 9 will be revised to 'optimising development' instead of 'maximising development'.

4.15.4 In response to comments by English Heritage and the Hammersmith and Fulham Historic Buildings Group, Table 3 will also be revised to clarify that new development has the potential to conflict with enhancing and respecting the character and appearance of heritage assets and their settings.

4.15.5 English Heritage raises concerns that the SA tests the 'worse case' scenario and by doing so removes the opportunity of testing the sustainability of less intensive development. The SA will be revised to clarify that the SPD is a framework against which planning applications will be determined. The SA therefore tests the Key Principles of the SPD, not a development quantum, against the Sustainability Objectives.

4.15.6 English Heritage raises concerns that the SA is unwilling to develop solutions to areas of incompatibility identified between SA Objectives. These areas of conflict will be clarified under table 6. Reference will also be made to the need for these conflicts to be resolved in the SPD and required mitigation measures to resolve these conflicts are set out in table 9.

4.15.7 Finally, English Heritage states regret that the SPD does not use various development scenarios to identify where tall buildings could be located, in order to resolve the potential conflict between new development and heritage assets. Alternatively, EH request that the SA requires a tall building strategy in accordance with the CABE/EH guidance on tall buildings. As stated, the SPD is a framework to assess various development proposals. The SPD contains a number of Key Principles to control the impact of development on heritage assets and this will be

revised to specifically control the setting of heritage assets surrounding the OA. The SPD will also now include reference to the CABE/EH Guidance on tall Buildings. The SA will be revised to require a Design and Access Statement with planning applications that thoroughly assess the impact of the proposal within the OA on heritage assets (listed buildings and structures, conservation areas and registered parks and gardens) surrounding the SA.

## **4.16 Equalities Impact Assessment**

4.16.1 A total of 3 comments were received on the Equalities Impact Assessment (EQIA).

4.16.2 One consultee felt that the EQIA had not fully considered the needs of those who need supported housing, Mental Health users, the homeless, refugees and those that cannot aspire to be on the property ladder. Officers considered that the SPD has a positive impact on the need for supported housing (HO15), the needs of Mental Health users (HO15, ES8, SC2 and SC6), the homeless (HO6, HO7, HO15, ES8 and SC6), refugees (HO6, HO7, HO15, ES8 and SC6) and those that cannot aspire to be on the property ladder (HO6 and HO7).

4.16.3 One consultee noted that the previous draft of the EQIA had identified a need for greater detail in the SPD on access for disabled people. The relevant London Plan policy has been added to the policy context for the Urban Form Strategy in the SPD. New text has also been added to the 'Outcomes and Recommendations' section of the EQIA setting out what actions have been undertaken to address deficiencies identified in the SPD as part of the previous EQIA.

4.16.4 One consultee felt that the EQIA was not being critical enough, particularly in relation to the impacts of estate redevelopment. In response to this, the EQIA has been revisited and redrafted where necessary, to reflect any potential negative impacts of estate redevelopment on protected characteristics.

## **4.17 Character Area Analysis**

### **4.17.1 Overview**

A total of 7 comments were made in relation to the Character Area Analysis SPD Supporting Evidence Document. A summary of the key issues and themes raised by respondents in relation to the vision and objectives are set out below.

4.17.2 The majority of the comments received were from English Heritage, who recommended that the document should place more emphasis on the impact of surrounding heritage assets. They were concerned that because heritage assets are presented as the final consideration for each character area they may not have been given sufficient weight, but rather

treated as secondary to the urban design observations. Officers pointed out that this was not the case. Heritage and Urban Design considerations were given equal weight in the drafting of the document. They went on to request that the Conservation Area Proposal Statements/Character Profiles for conservation areas were given more prominence and that conservation staff at both boroughs were consulted in order to strengthen the information in the Character Area Analysis. Officers reviewed these concerns, but felt that it was unnecessary to restate information that can already be found in the existing conservation area documents. It was however decided that a new paragraph should be added to the Heritage Assets section of the Site Context Chapter (Chapter 02) in the main body of the SPD to make it clear that there are Character Profiles or Conservation Area Proposals Statements available for most of the surrounding conservation areas and that any proposals for the OA will be expected to pay due regard to them.

- 4.17.3 English Heritage also questioned how the parameters for each of the character areas were arrived at. In response, a new set of paragraphs have been added to the introduction of the Character Area Analysis SPD Supporting Evidence Document describing the reasons why the boundaries between each character area were established.

## **4.18 Townscape and Visual Analysis**

### **4.18.1 Overview**

A total of 26 comments were received on the Townscape and Visual Analysis from 2 respondents, summarised under the following topics.

- The Setting of St Cuthbert's Church in Philbeach Gardens Conservation Area;
- The Setting of conservation areas; and
- The Setting of Brompton Cemetery (Grade 1 listed Registered Park).

24 of the 26 comments were received from English Heritage and such this report will refer directly to English Heritage comments in summary in the whole. A summary of the key issues and themes raised by respondents in relation to these topics is set out below.

### **4.18.2 The Setting of St Cuthbert's Church in Philbeach Gardens Conservation Area**

The respondents raised concern of the appearance in views containing St Cuthbert's Church, of any proposals that may come forward as a result of the SPD in particular that no new development should be seen behind St Cuthbert's church hall and the Main Church building as viewed in views 15 and 16. Respondents also further raised concern regards any development or proposals on the OA wrapping around the extents of the Church and Church hall thereby over enclosing the Church.

- 4.18.3 To preserve and or enhance the setting of the Church (a listed building) , the wording in the guidelines will be changed to strengthen protection for

the setting of the church to include closes that ensure that buildings which rise behind the roofline of Philbeach crescent which could rival the dominance of the listed church and harm its setting if placed in close proximity must be set well away from the church and leave a substantial view of sky between them.

#### **4.18.4 The Setting of Conservation Areas**

English Heritage refer in majority in their comments to their English guidance document 'The Setting of Heritage Assets (October, 2011)' which contains their recommended methodology for the application of PPS 5 in relation to impacts such as new development within views from conservation areas. In accordance with their Setting Guidance, English Heritage consider that the current methodology for the Townscape and Visual Analysis report (TVA) would benefit from looking more closely at the contribution of the views from the relevant conservation areas and Registered Parks and Gardens of Historic Interest to the significance of those conservation areas and parks and gardens..

4.18.5 Furthermore English Heritage consider that many of the guideline paragraphs in the Townscape and Visual Analysis require strengthening for compliance with PPS 5.

4.18.6 The methodology employed for considering the impact on each view from Conservation areas and Registered Parks and Gardens of Historic Interest includes an assessment of the aesthetic and historic significance of the view. Conservation Area Proposals Statements from both Borough's were drawn on to support the assessments. We believe the methodology is consistent with PPS5. The resulting guidelines are based on a thorough assessment of the significance of the view and the appropriate level of protection required for the historic asset. Therefore the wording does not need to be changed.

#### **4.18.7 The Setting on Brompton Cemetery**

English Heritage raised concerns that there was very minimal analysis of the listed monuments within Brompton Cemetery in relation to the views contained in the TVA. they considered that where individual listed monuments and structures are identifiable within the view they should form part of the analysis of significance. Character or conservation area appraisals and management plans prepared by RBKC and the Royal Parks can be instrumental in undertaking this work and there is no evidence that these have been drawn upon. They also highlighted the fact that a further 21 monuments have been recommended for inclusion on the statutory list as either Grade II or Grade II\*.

4.18.8 English Heritage also highlighted concerns of proposed enclosure of the cemetery. They do not consider that a sense of enclosure is essential for the western side of the cemetery. They accept that the western side of the cemetery will be enclosed by development but are of the opinion that the level of enclosure does not necessitate additional buildings that would be



visible in several views from the cemetery (view 31, 32, 35, S18 and S19). However they assert there may be a case for improving the existing views if the improved integration of the Empress Building into the surrounding townscape could be achieved.

4.18.9 With the removal of EC1 there is an opportunity to improve the setting of the cemetery in this view and to improve the backdrop to the western arcade and bell tower. Lower buildings on the site of EC1 could be less intrusive in the skyline and could restore the prominence of the bell tower in the horizon view. Any visible new buildings beyond the cemetery boundary could enhance the view if they were to incorporate slender and vertical proportions in response to the many vertical elements within the cemetery. Gaps between buildings and glimpses of sky between them will also be necessary to break up the massing particularly where positioned close to the Empress State Building. The Royal Borough of Kensington and Chelsea's Conservation Area proposals Statement for Brompton Cemetery draws attention to the weak enclosure of the west side of the cemetery. The guidelines do not need to be changed.

## **4.19 Edges**

### **4.19.1 Overview**

A total of 5 comments were received on the Edges Study 3 respondents, all relating to effects of the SPD proposals on Cluny Mews. A summary of the key issues and themes raised by respondents in relation to Cluny Mews are as follows:

### **4.19.2 Heights**

All 3 respondents raised concerns related to the heights of any developments permitted through the SPD on the site currently occupied by the Qatar Airways Building, the Adshel Building and the Advertising Hoardings.

4.19.3 The respondents referred to previous planning applications for developments on this part of the OA being limited to heights respecting the heights of the terraced properties on Philbeach Gardens. All 3 respondents suggest new proposals should allow for buildings no higher than those of adjacent existing neighbouring buildings.

4.19.4 One of the respondents suggests a further sectional study through this part of the OA is undertaken to demonstrate the relationship of existing buildings on the edge of the OA to Cluny Mews and Philbeach Gardens. A section through this part of the OA has been included in the Edges study.

### **4.19.5 Edge/Boundary Setback**

The respondents raised concerns of any building being built on the edge of the OA suggesting that any new development should be set back from the boundary of the OA and neighbouring properties to maintain or not harm the current amenity enjoyed by existing neighbouring properties.

4.19.6 The SPD supports an approach to proposals on the OA along the edges to respond appropriately to existing edge conditions and that new buildings on and near the edge of the OA are sensitively integrated into and enhance the existing context. This is covered in Principle UF26, UF27, UF28 and UF29 of the Chapter 04 of the SPD.

## **4.20 Development Capacity Scenarios**

### **4.20.1 Overview**

A total of 7 comments were made in relation to the Development Capacity Scenarios SPD Supporting Evidence Document. A summary of the key issues and themes raised by respondents in relation to the vision and objectives are set out below.

### **4.20.2 General Comments**

In general, the comments received were fairly specific, pointing out particular aspects of individual drawings that respondents wished to query. For example, one respondent asked which of the plans showing potential development heights for each of the scenarios was the authorities' preference. Another respondent highlighted concern about the potential heights that these drawings indicate in the Cluny Mews area of the OA. One comment requested a reference to green infrastructure in relation to "station squares" and another queried why trees were shown along the edge of the railway line adjacent to Seagrave Road in Scenarios 1 to 3 but not in the "Alternative Scenario". Officers considered all of the specific responses, but considered that, as the introduction to the Development Capacity Scenarios SPD Supporting Document makes it clear that none of these illustrative Masterplan drawings present a conclusive or final solution for the development of the OA, there was no need to change them.

4.20.3 Capco raised concern that the Development Capacity Scenarios should only be treated as supporting the SPD, and should not be seen as setting specific design solutions, an overall cap or maximum limit on development or a particular land use mix and quantum. The authorities clarified this by amending the text in both the introduction within the Development Capacity Scenarios SPD Supporting Evidence Document and in the introduction to the main body of the SPD. This should also help to alleviate the sort of confusion about the nature of the illustrative drawings that were raised in the more specific comments outlined earlier.

4.20.4 In error, only Scenario 3 was referred to as "previously published". This should have been the case for Scenarios 1 and 2 as well. This was queried by one respondent, and as a result the document has been amended so that Scenarios 1 to 3 each have the heading "As published in 1st draft of SPD".

## **4.21 Estates Regeneration Economic Appraisal**

### **4.21.1 Overview**

A total of 48 comments were received on the Estates Regeneration Economic Appraisal, summarised under the following topics:

- General;
- Evidence process;
- Current condition of the estates
- Estate Regeneration options; and
- Estate management.

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

### **4.21.2 General**

Only one consultee made comments on the Estate Regeneration Economic Appraisal. The consultee was of the opinion that the study was fundamentally flawed. The reasons behind this are set out below. The consultee also felt that the study had not been completed and that it would need to be finalised and reconsulted on before the production of the final SPD. It was clarified that the Appraisal had been completed and that no further round of consultation would be necessary. There was a concern that the proposals were to move all existing residents from the estates to the Seagrave Road site and that the current problems with socio-economic deprivation would merely be shifted to a different location. It was clarified that the proposals are that only 25% of the Seagrave Road site is used for estate re-housing and that the other re-housing would occur as part of a phased approach to the main site.

4.21.3 Separately, points were made in relation to job loss and creation in relation to the proposed comprehensive approach to development of the OA. These points are covered in the Employment Strategy section of this report.

### **4.21.4 Evidence Process**

The consultee was concerned that no consultation had been undertaken with the estates' residents. It was clarified that various consultations had been undertaken by both the council's planning and housing departments, with the estates' residents over the past two years. The consultee felt that minimal data had been provided about the existing estates. Officers considered that the evidence on the existing estates produced in support of the Appraisal was sufficiently detailed. The consultee considered that some of the wording within the Appraisal was confusing and misleading, such as using the word 'regeneration' when what is meant is 'demolition'. In response, officers have revised the Appraisal so that 'regeneration' has been amended to 'redevelopment'. The consultee criticised the lack of consideration of phasing. It was clarified that phasing was considered as part of the Appraisal, but that phasing would also need to form part of any consideration by the housing authority around the inclusion of the estates

within any approach to comprehensive redevelopment. There was also a concern that a lot of the data within the Appraisal had not been sourced. It was clarified that the data within the Appraisal has either come from Lower Super Output Area Census data or data within the West Kensington and Gibbs Green Estates Profiles document, whilst was provided separately to the consultee.

#### **4.21.5 Current Condition of the Estates**

The consultee criticised the assertion that discontinuous internal roads are a poor design solution, with reference to the DCLG/Department of Transport "Manual for Streets" and also questioned whether many of the streets within the estates are discontinuous and why those that are, cannot be redesigned to connect with existing streets. Officers clarified that although there is no explicit statement in the Manual for Streets that "discontinuous streets are in all cases a poor design solution", it is implied throughout the document that a well connected, permeable network of streets is preferable. Officers clarified those roads that were considered to be discontinuous and also what is meant by the term discontinuous, as well as clarifying that deliberate breaks that exist on the streets to prevent rat running are not considered to make roads discontinuous, as long as connectivity for pedestrians is still possible. The consultee also criticised the assertion that the estates have poor quality open space, given that there is no evidence of their vandalism. Officers clarified that the statement concerning 'poor quality urban space' refers to the role of open space in the urban grain and layout of the estates rather than any vandalism or dumping. The consultee considered that the existing housing stock is of good quality and should not be used as justification for the demolition of the estates. Officers considered that the current housing stock was not being considered as one of the reasons for demolition; however, ongoing management costs were a consideration, which is covered in the 'Estate Management' section below.

#### **4.21.6 Estate Regeneration Options**

The consultee generally felt that the five options in the Appraisal had been poorly thought through. The consultee objected to the fact that option 1 did not consider any physical improvements to the estates. Officers clarified that both options 1 and 2 do consider infill development, as well as the ongoing management costs, which would include the physical upkeep of the estates. The consultee felt that option 2 made unsubstantiated claims about the viability of infill development. It was clarified that the Appraisal is supported by various development appraisals and cost models and that as a result, the claims about the viability of infill development are substantiated. The consultee considered that it is unclear what is being proposed within options 3a and 3b, particularly in relation to what any comprehensive regeneration of the estates on a standalone basis would look like. It was clarified that the exercise undertaken was a density analysis looking at viability, rather than an engineered design solution. The consultee objected to the large uplift in market housing in options 3a, 3b and 4 on the grounds that market housing would be unaffordable to many

in the borough. It was clarified that financial constraints had to be considered. It was clarified that option 4 would provide 24% affordable housing, providing 1,824 units, which could easily provide for the needs of existing estate residents as well as providing additional affordable housing to meet the needs of those on low and medium incomes. It was also clarified that although not affordable to many, market housing also contributes towards meeting housing need.

#### **4.21.7 Estate Management**

The consultee felt that the management and maintenance costs had been poorly thought through and the solution settled upon appears the most expensive. Officers clarified that management and maintenance costs had been assessed in relation to each option and formed part of the assessment. It was also clarified that although the current housing stock was not being considered as one of the reasons for demolition, ongoing management costs were a consideration as it was recognised that as the estates aged over time, management and maintenance costs would rise. The consultee stated that the problems of over and under occupancy identified in the appraisal could be overcome by better estate management. It was acknowledged that effective estate management can address issues of overcrowding and under-occupancy; however, it was clarified that the focus of the Appraisal was on the net additional economic benefits to the two boroughs associated with the inclusion or otherwise of the estates within the redevelopment options for the Opportunity Area. The consultee continually made the point that nowhere in the Appraisal has it considered options for community ownership of the estates. It was clarified that options 1 and 2 consider the potential for improvements and infill that could be undertaken as part of a community transfer.

## **4.22 Strategic Transport Study Review**

### **4.22.1 Overview**

A total of 11 comments were received on the Strategic Transport Study Review document from 1 respondent. These comments are distinct from those received on the Transport and Accessibility chapter, which are covered in a separate summary report. The comments are summarised under the following topics:

- Walk and Cycle Trips;
- Earls Court Station; and
- Piccadilly Line.

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

### **4.22.2 Walk and Cycle Trips**

The number of forecast walk and cycle trips generated by OA development was questioned. It was felt that the numbers presented were an overestimate as the majority of people entering or leaving the OA would use public transport and that there would be relatively few cycle trips

owing to the high levels of traffic present on the local road network. The forecast level of future walk and cycle trips to and from the OA outlined in the Strategic Transport Study Review document are however representative of existing travel patterns and moreover, could be expected to be even higher given current trends showing increasing levels of walking and cycling as well as the impact of measures to encourage more walking and cycling as set out in the SPD document.

#### **4.22.3 Earls Court Station**

Several comments outlined concerns that Earls Court station would be unable to cope with OA development and that it could even become dangerous if development went ahead. Key areas of concern were potential overcrowding on the District line platforms, too few lifts and escalators leading to the Piccadilly line platforms to cope with demand, including from people with luggage and the 'pinch point' at the top of the escalators leading from the District line down to the Piccadilly line. The analysis carried out as part of the Strategic Transport Study considered the impact of development on Earl's Court Station for the busiest peak hour and established that, with the interventions proposed in the SPD it would still be able to operate at an acceptable level with OA development. The proposed intervention of an additional station entrance from within the OA site using a tunnel under Warwick Road was shown to reduce congestion on the District line platforms.

#### **4.22.4 Piccadilly Line**

Away from Earls Court Station, there were a number of comments on the wider impact of OA development on the Piccadilly Line. Several comments referred to current levels of congestion both on the line itself and at other stations towards central London, namely Gloucester Road and South Kensington. References were also made to services to Heathrow airport and the passenger demand this generated. The strategic transport study found that with the Piccadilly line upgrade, which is expected to increase line capacity by around 25% and is programmed to be in place prior to OA development, the level of crowding on the line was not forecast to be worse than current levels even with the addition of OA development.

#### **4.22.5 Phasing**

The DRP felt that, as it is almost impossible to predict phasing sequences, the SPD should concentrate on defining illustrative development 'parcels' rather than sequential phases. The SPD was amended in line with this comment. Concerns were raised by another respondent that the north-south connection was not shown during a sufficiently early phase of development. This was addressed by removing any reference to sequential phasing and referring instead to "illustrative development parcels" that could come forward in any suitable order. Capco felt that the phasing details were too prescriptive for an SPD and that it could prove inflexible. Again, this was addressed by removing any reference to sequential phasing and referring instead to "illustrative development parcels".

4.22.6 Another respondent raised concerns that future phases may get delayed or indeed may never happen. This respondent recognised that the benefits of redevelopment will only be to the best advantage of residents once comprehensive regeneration is complete. Chapter 13 on Phasing and Section 106 has been amended to introduce two new Key Principles that deal with this issue in more detail. Another respondent questioned whether it is essential to demolish the existing housing estates in order to deliver the Urban Form aspirations. Officers have given full consideration to this issue throughout the entire process of producing the SPD and Development Capacity Scenarios and feel that comprehensive redevelopment has the potential to deliver optimum benefits.

#### **4.22.7 Other Comments**

Some respondents expressed a belief that the SPD gives insufficient attention to heritage assets in and around the OA and requested that they should be given greater emphasis. This has been addressed by giving greater prominence to the Heritage Assets section of the Site Context chapter (Chapter 02).

4.22.8 A large number of comments raised concerns that the use of materials is not addressed in the SPD and that it should be a requirement that all materials reflect those found in the existing context. Similarly, a number of respondents also raised concerns that the SPD does not seek to control or guide the architectural quality or design of any new buildings. Some respondents made specific reference to the design of any building that is intended to replace the existing façade of Earl's Court 1 (EC1), either hoping to see the existing frontage retained or expressing a preference for a new building inspired by the existing Art Deco façade. Officers considered all of these comments, but felt that including specific requirements for materials or architectural styles would be too prescriptive for a strategic planning document like the SPD. Each application that is submitted will be considered on its own merits in regard to such detailed issues.

4.22.9 The Hammersmith and Fulham Disability Forum expressed support for the references made to selected access standards in the SPD, but noted that these are not comprehensive and requested further reference to acceptable gradients, step free routes and sufficient evacuation lifts in new buildings. Officers considered these issues but came to the conclusion that they are too detailed for inclusion in a strategic planning document like the SPD. As they can all be found in other documents like Building Regulations, it was not considered necessary to repeat them in the SPD at the risk of unnecessarily lengthening the document.

### **4.23 Viability Summary**

4.23.1 A total of 3 comments were received on the Viability Summary.

4.23.2 One consultee criticised the assumptions set out in the Viability Summary report. The authorities consider the Viability Summary to be accurate in relation to the three development capacity scenarios set out in the Development Capacity Scenarios supporting evidence paper. The authorities have added text to the introduction of the SPD clarifying that the Viability Summary was accurate at the point at which it was undertaken in 2011, but that any applicant would need to undertake their own viability assessment in support of any planning applications. One consultee also wished to have reference to them contributing towards the production of the viability summary removed, which has been undertaken. One consultee was concerned that the Viability Summary was showing that development would fail to underwrite the costs of necessary infrastructure and affordable housing. Officers clarified that the Viability Summary concludes that some of the scenarios are viable.

## **4. 24 Ecological Aspirations Report**

### **4.24.1 Overview**

A total of 3 comments were received on the Ecological Aspirations Report. All of which submitted by Natural England.

4.24.2 In response to these comments, the report will be revised to clarify that Counters Creek is now cultivated and no longer creates a wetland / soak away and specifically refer to 'living' roofs, which include 'green' and 'brown' roofs. NE welcomes the benefits of Green Infrastructure in Appendix 4, such as alleviation of heat island effects, health and well being.



## **Introduction**

### **Acknowledgements**

#### **Project Team**

##### **LBHF**

[Chris Bainbridge](#)

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[Allison Flight](#)

[Deborah Lee Sang](#)

[Brendon Roberts](#)

[Penelope Tollitt](#)

[Chris Turner](#)

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[Chris Porter](#)

[Camiilla Ween](#)

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## Foreword

The Earl's Court and West Kensington Opportunity Area is one of the few remaining large development sites, close to central London, which has the potential to bring economic opportunity, new homes and new jobs on a grand scale.

The area has gone through significant change over the years. A collection of orchards and brickfields were replaced by a transport depot and coal yard. Then the area grew to become an internationally recognised exhibition venue, as well as home to over 1,500 people and an important element in London's transport infrastructure.

Over recent years the London Borough of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea and the Greater London Authority have come together to investigate the potential for the redevelopment of the Earl's Court Exhibition Centres. No one underestimates the contribution that the exhibition centres have made to the local economy; however, redevelopment could continue the Earl's Court 'brand' by creating a new vibrant cultural destination, as part of a new mixed use quarter which will provide new benefits to the local community, such as new businesses, shopping and employment opportunities.

Looking beyond the exhibition centres, in Hammersmith and Fulham the site of the Transport for London depot and the West Kensington and Gibbs Green housing estates offer huge potential for a comprehensive approach to redevelopment. This approach provides opportunities to re-house residents in better accommodation and build thousands of new homes, many of which will be affordable to those on low and middle incomes.

New infrastructure will be necessary to support the new population, including new roads, buses and improvements to the local stations, as well as a range of social and community facilities.

We have the chance to create a truly inspiring new urban quarter through the redevelopment of the Earl's Court and West Kensington Opportunity Area. Comprehensive redevelopment of the area presents a fantastic opportunity to improve connections between communities that are currently severed by the railway infrastructure and exhibition centres.

The challenge to developers is to create buildings and spaces which will stand the test of time. The area is surrounded by nineteen conservation areas, several important listed buildings and Brompton Cemetery, a Grade 1 listed historic park and Garden. We want to develop a quarter worthy of this setting.

This planning framework is a major step towards creating a successful new place in Earl's Court where people want to live, work and visit. We have therefore been careful to place people at the centre of its creation. The input and careful consideration of many local residents and businesses has been invaluable. We hope that you, like us, are excited about what this area will be like in the future.

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**Deleted:** 1.0 - We are asking for comments on this revised draft Joint Supplementary Planning Document (hereafter referred to as SPD). It provides guidance which would carry considerable weight when assessing planning applications in the Earl's Court and West Kensington Opportunity Area (hereafter referred to as the OA).¶

¶  
1.1 - The first draft of the SPD was issued for public consultation between the 11th March 2011 and 26th April 2011. A Statement of Consultation, showing how comments made on that draft have been taken into account in this revised draft, is published alongside this SPD. ¶

¶  
1.2 - Please send any comments on this revised SPD:¶  
<#>by email to: earlscourtspdconsultation@lbhf.gov.uk; and ¶

<#>by post to: The Earl's Court and West Kensington Opportunity Area Project Team, Planning Division, Environment Services Department, London Borough of Hammersmith and Fulham, 5th Floor, Hammersmith Town Hall Extension, King Street, Hammersmith, London, W6 9JU.¶

¶  
1.3 - Please submit your comments by **5pm Friday 23 December 2011** and make it clear in your written comments which Key Objective, Key Principle, Chapter, Paragraph, Table or Figure you are commenting on. When making any representations you may request to be notified at a specified address of the adoption of the SPD.¶

¶  
1.4 - Copies of this revised SPD, together with all supporting documents including the representations made on the first draft SPD and how the issues raised in these representations have been addressed in the revised draft SPD will be available to view at:¶  
<#>Earl's Court Exhibition Centre, Warwick Road, London, SW5 9TA.¶

¶  
1.5 - The following websites: ¶  
<#>The London Borough of Hammersmith and Fulham's (LBHF) - www.lbhf.gov.uk/earlscourtspd;¶  
<#>The Royal Borough of Kensington and Chelsea's (RBKC) - www.rbkc.gov.uk/earlscourtspd; and¶  
<#>The Greater London Authority's (GLA) - www.london.gov.uk.¶

¶  
1.6 - Authority and Housing offices:¶  
<#>The Duty Planner Office, First Floor, Hammersmith Town Hall Extension, King Street, Hammersmith, London, W6 9JU (9am to 5pm Monday to Thursday and 9am to 5pm on Friday);¶  
<#>Housing Office, Fulham To (... [1])

Stephen Greenhalgh  
Leader, the London Borough of Hammersmith and Fulham

Sir Merrick Cockell  
Leader, the Royal Borough of Kensington and Chelsea

▼ This document will be made available in large copy print, audio cassette, Braille, or languages other than English upon request. If you require the document in one of these formats, please see the contact details above.

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Figure 1.1: (Page 03) View of the OA from the ARK building, Hammersmith

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### Status of this Document

1.1. This document is a Supplementary Planning Document (hereafter referred to as SPD), providing supplementary detail to policies contained within the London Borough of Hammersmith and Fulham's (hereafter referred to as 'LBHF'), Core Strategy (2011) and the Royal Borough of Kensington and Chelsea's (hereafter referred to as 'RBKC'), Core Strategy (2010). It also provides supplementary detail to the Mayor of London's London Plan (2011) in the form of Supplementary Planning Guidance (hereafter referred to as SPG)<sup>1</sup>. The SPD should be read in conjunction with the Mayor's London Plan, the borough Core Strategies and other relevant Development Plan Documents and SPDs.

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1.2. This SPD is a material consideration for the determination of any planning applications submitted within the OA.

Deleted: 1.11 - This revised draft SPD builds on the first draft SPD, published for consultation in March 2011, and where appropriate reflects the comments made.

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Deleted: the Town and Country Planning Act 1990 (as amended),

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Deleted: a Statement of SPD Matters, which are available for comment during the consultation period.¶

1.3. This SPD has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), the Planning and Compulsory Purchase Act 2004 (as amended), the Greater London Authority Acts 1999 and 2007 and Planning Policy Statement 12: Local Spatial Planning. This document is supported by a Sustainability Appraisal, an Equality Impact Assessment, a Statement of Consultation, an Adoption Statement and the Consultation Summary Report.

Figure 1.2: Aerial photograph of the OA

Deleted: 1.13 - Once this second round of consultation ends, the authorities will consider the comments raised and where appropriate revise the SPD. Once this has been completed, it is the authorities' intention to adopt the final document as a SPD to RBKC's and LBHF's Core Strategies and as a SPG to the Mayor of London's Spatial Development Strategy for London (the Mayor's London Plan). ¶

<sup>1</sup> Please note that the Mayor of London is unable to endorse this planning framework as an SPG to the London Plan during the Mayoral pre-election period. Should the Mayor subsequently choose to adopt this document as an SPG to the London plan, this document will need to be revised to include the Mayor of London's signature and logo and reference to the document being 'subject to endorsement by the Mayor' and this paragraph will be removed.

## Purpose of this Document

1.4 This document has been produced in partnership between LBHF, RBKC and the Greater London Authority (hereafter referred to as 'GLA'), (the 'authorities').

The overall objectives of this 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 planning applications in the OA;
- establish and provide guidance for masterplanning within the OA;
- bring forward partnership working in redeveloping the OA and maximise public and private resources in regeneration; and
- engage all interested stakeholders as early as possible in the development process.

1.5 Figure 1.3 illustrates the agreed boundary of the OA. The OA is identified by description in Annex I of the London Plan (2011) which states that "the area presents a significant opportunity for regeneration comprising estate renewal and housing and employment growth".

1.6 Capital and Counties (Capco) own the freehold for Seagrave Road car park, are joint owner of the Empress State Building and have a lease on the Earl's Court Exhibition Centres. Transport for London (TfL), who own the freehold to the Lillie Bridge Depot and the land upon which the exhibition halls sit (subject to long leases to Capco), are actively collaborating with adjacent landowners to include their land within the wider redevelopment proposals, as are LBHF, who own the freehold for the West Kensington and Gibbs Green housing estates.

1.7 It is recognised that, more than ever in this current time of economic uncertainty, flexibility will be needed to achieve the authorities' strategic vision of comprehensive redevelopment, as reflected in Key Principles HO1 and PS1. 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. The SPD has been drafted with this flexibility in mind, such that it can be applied to any application coming forward in the OA.

Figure 1.3: Major Land Owners in the OA

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Deleted: This SPD has been prepared in response to the development aspirations of one of the major landowners within the OA, Capital and Counties (Capco), where the redevelopment of their landholdings has the potential to be a catalyst for regeneration of the wider OA in LBHF.

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¶

1.17 Capco own the freehold for both Seagrave Road car park and the Empress State Building and have a lease on the Earl's Court Exhibition Centres. After the 2012 Olympics the Earl's Court Exhibition Centres and the Seagrave Road car park sites are likely to be redeveloped. Transport for London (TfL), who own the freehold to the Lillie Bridge Depot and the land upon which the exhibition halls sit (subject to long leases to Capco), are actively collaborating with adjacent landowners to include their land within the wider redevelopment proposals. ¶

¶

1.18 LBHF own the freehold for the West Kensington and Gibbs Green housing estates. LBHF is undertaking a review of the economic benefits and disbenefits of estate regeneration (known as the 'Estates Regeneration Economic Appraisal') and its initial conclusions are that estate regeneration as part of a wider masterplan, delivers optimum benefits. LBHF, as landowner and being responsible for the estates as housing authority, has accepted and endorsed the conclusions contained within the Estates Regeneration Economic Appraisal, subject to the outcome of further consultation with local residents and any required consents from the Secretary of State. ¶

¶

1.19 The authorities (in their capacity as planning authorities) previously consulted on this draft SPD which contained three development capacity scenarios. One of these scenarios looked at a development scenario not involving the West Kensington and Gibbs Green estates whereas the other two looked at a comprehensive scenario including the estates. The authorities, having considered the representations received from the previous consultation and the initial conclusions drawn from the economic review, in so far as they are rel (... [2]

## Policy Context

1.8 The entire site is identified in the London Plan as an Opportunity Area. In addition, the Core Strategies for LBHF and RBKC both contain planning policies specific to development in the OA. Together, these policies require a minimum of 7,000 jobs and 4,000 homes in a comprehensive residential led mixed use development that includes offices, retail, social and community facilities and a significant cultural destination. These policies also require improved east-west connectivity through the OA and development to uphold and promote the distinctive townscape and range of heritage assets in the area. The policies are reproduced in full in the Appendix.

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1.9 In addition to these OA specific planning policies, there are also theme based national, regional and local planning policies which apply to any redevelopment of the OA. The Mayor of London has other theme based Supplementary Planning Guidance (such as the Mayor's draft Housing SPG (2011)). These documents include guidance on applying the Mayor's density matrix to large sites. Both boroughs also have theme based Supplementary Planning Documents (such as Noise / Air Quality SPDs in RBKC) which also apply to redevelopment of the OA.

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Deleted: (such as the London Plan Housing SPG (2005), the Interim Housing SPG (2010) and the Housing SPG EIP draft (2010))

## Structure of the Document

1.10 This SPD comprises of the following chapters:

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1.11 **1: INTRODUCTION.** Introduces the SPD, setting out its status and purpose and the timetable for its adoption.

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1.12 **2: SITE CONTEXT.** Sets the scene for the OA as it is today, by describing the spatial, social and historical context for the area.

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1.13 **3: VISION AND OBJECTIVES.** Sets out the Vision and Key Objectives to guide development in the OA.

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1.14 **4: URBAN FORM STRATEGY.** Establishes the Key Objectives for the urban form of the OA and provides Key Principles setting out how they could be achieved.

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1.15 **5: HOUSING STRATEGY.** Sets out the requirements for housing provision in the OA, in particular in terms of any estate regeneration proposals, tenure mix and unit size mix.

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1.16 **6: EMPLOYMENT STRATEGY.** Sets out the requirements for office provision and local job creation and training in the OA.

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1.17 **7: RETAIL STRATEGY.** Sets out the requirements for retail provision within the OA.

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1.18 **8: CULTURE STRATEGY.** Sets out the requirements to create a cultural destination that retains Earl's Court's cultural 'brand'.

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1.19 **9: SOCIAL AND COMMUNITY FACILITIES STRATEGY.** Sets out the requirements for the provision of social and community facilities, such as education (secondary, primary and nursery), health, leisure and sports provision, policing facilities, library provision and community meeting spaces.

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1.20 **10: TRANSPORT AND ACCESSIBILITY STRATEGY.** Sets out the necessary improvements to the transport infrastructure to accommodate development, including walking, cycling, public transport and traffic.

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1.21 **11: ENERGY STRATEGY.** Sets out requirements for development to reduce carbon dioxide emissions and deliver energy sustainability.

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1.22 **12: ENVIRONMENTAL STRATEGY.** Outlines requirements relating to climate change, flood risk and water management, land contamination, waste, demolition and construction, land contamination, air pollution, noise pollution and ecology.

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1.23 **13: PHASING AND SECTION 106 STRATEGY.** Sets out the required contributions from development and when, where known, these contributions should be delivered.

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1.24 **POLICY CONTEXT APPENDIX.** Provides the current planning policy context in relation to the OA, as set out in the Mayor's London Plan (2011), RBKC's Core Strategy (2010) and LBHF's Core Strategy (2011).

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1.25 Chapters 4 to 12 all follow a similar structure, based on the following diagram:

#### WHAT?

Redevelopment of the OA will be expected to meet each of the Key Objectives described in the SPD. Under each Key Objective there is also a number of Key Principles that will be used to assess development proposals in the OA.

#### WHY?

Each Key Objective and Key Principle has regard to the existing **policy context**, detailed **character and context assessment**, up to date **evidence base** and ongoing **consultation findings**.

#### HOW?

Under each Key Principle, the SPD then describes how it is to be delivered in development proposals.

Figure 1.4: Structure of the SPD chapters

## **SPD Timetable and Supporting Documentation**

1.26 Figure 1.5 summarises the timetable and key consultation stages in the preparation of this SPD. It also shows what supporting evidence has informed its production. A number of supporting evidence documents have been produced in order to inform this SPD. These can be found on the three authorities' websites and should be read alongside this SPD. A summary of each document is provided below:

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1.27 **SUSTAINABILITY APPRAISAL.** Assesses the potential impacts of the document on a range of environmental, social and economic criteria.

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1.28 **EQUALITY IMPACT ASSESSMENT.** Assesses the potential impacts of the document on a number of identified minority groups.

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1.29 **STATEMENT OF CONSULTATION.** A statement setting out those consulted by the authorities in connection with the preparation of the SPD, how the consultations were carried out, a summary of the main issues raised in those consultations ("the Consultation Summary Report") and how the representations have been addressed in the SPD ("the Consultation Responses Schedule")

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1.30 **CONSULTATION SUMMARY REPORT.** Provides a summary of the comments raised during consultation on the revised draft of the SPD.

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1.31 **CONSULTATION RESPONSES SCHEDULE.** Sets out the comments received during consultation on the revised draft of the SPD and the officers' responses to these comments.

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1.32 **CHARACTER AREA ANALYSIS.** Is a study of the local urban character of the OA and its surroundings.

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1.33 **TOWNSCAPE AND VISUAL ANALYSIS.** Is a study of the physical fabric of the area and townscape through the analysis of existing views towards the OA from observation points around the OA. The analysis assesses the setting of existing

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Conservation Areas' skylines through an eye level visual assessment that identifies the key attributes and features in each view.

1.34 **EDGES STUDY.** Is a study of the existing OA boundary edge conditions between the OA and properties which share its boundary.

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1.35 **DEVELOPMENT CAPACITY SCENARIOS.** Sets out the three development capacity scenarios that were published in the first draft of the SPD. An illustrative Masterplan is provided for each and they are tested against the revised Key Objectives. They are followed by an alternative illustrative masterplan solution demonstrating a different approach to urban design that has the potential to meet all of the Key Objectives. Any masterplan images in this, or any other SPD document, do not and will not fix a design form and layout for the OA.

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1.36 **EARL'S COURT AND WEST KENSINGTON OPPORTUNITY AREA OFFICE STUDY (2011).** Explores the potential for office floorspace within the OA.

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1.37 **EARL'S COURT AND WEST KENSINGTON OPPORTUNITY AREA RETAIL NEED ASSESSMENT (2010).** Provides an assessment of retail need in the OA, looking specifically at retail capacity.

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1.38 **EARL'S COURT AND WEST KENSINGTON OPPORTUNITY AREA ECOLOGICAL ASPIRATIONS STUDY (2010).** Assesses the ecological and habitat value of the OA and sets out several aspirations to protect and enhance ecology and habitat diversity in the OA.

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1.39 **DECENTRALISED ENERGY FEASIBILITY STUDY (2011).** This sets out the potential for decentralised energy in the OA and sets out the strategic framework for the development of a site-wide, low carbon, decentralised energy scheme in the OA.

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1.40 **ESTATES REGENERATION ECONOMIC APPRAISAL (2011).** Provides a summary of the four options for intervention on the West Kensington and Gibbs Green estates.

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1.41 **TRANSPORT STUDY REVIEW (2011).** This Summary Report outlines the findings of the Earl's Court & West Kensington Strategic Transport Study (ECTS) and the independent review carried out by, and on behalf of TfL, LBHF and RBKC. The purpose of the review is to ensure that the ECTS and underlying analysis is acceptable to inform the SPD.

1.42 **VIABILITY REVIEW (2011).** Is a review that assessed the three development capacity scenarios (see para 1.47) above and assesses the viability of development at these three densities. The study was only accurate at the time it was undertaken in 2011 and any applications for development would need to be accompanied by their own viability assessments.

Figure 1.5: SPD timetable and supporting documentation

1.0 We are asking for comments on this revised draft Joint Supplementary Planning Document (hereafter referred to as SPD). It provides guidance which would carry considerable weight when assessing planning applications in the Earl's Court and West Kensington Opportunity Area (hereafter referred to as the OA).

1.1 The first draft of the SPD was issued for public consultation between the 11th March 2011 and 26th April 2011. A Statement of Consultation, showing how comments made on that draft have been taken into account in this revised draft, is published alongside this SPD.

1.2 Please send any comments on this revised SPD:  
by email to: [earlscourtspdconsultation@lbhf.gov.uk](mailto:earlscourtspdconsultation@lbhf.gov.uk); and  
by post to: The Earl's Court and West Kensington Opportunity Area Project Team, Planning Division, Environment Services Department, London Borough of Hammersmith and Fulham, 5th Floor, Hammersmith Town Hall Extension, King Street, Hammersmith, London, W6 9JU.

1.3 Please submit your comments by **5pm Friday 23 December 2011** and make it clear in your written comments which Key Objective, Key Principle, Chapter, Paragraph, Table or Figure you are commenting on. When making any representations you may request to be notified at a specified address of the adoption of the SPD.

1.4 Copies of this revised SPD, together with all supporting documents including the representations made on the first draft SPD and how the issues raised in these representations have been addressed in the revised draft SPD will be available to view at: Earl's Court Exhibition Centre, Warwick Road, London, SW5 9TA.

1.5 The following websites:

The London Borough of Hammersmith and Fulham's (LBHF) - [www.lbhf.gov.uk/earlscourtspd](http://www.lbhf.gov.uk/earlscourtspd);

The Royal Borough of Kensington and Chelsea's (RBKC) - [www.rbkc.gov.uk/earlscourtspd](http://www.rbkc.gov.uk/earlscourtspd);  
and

The Greater London Authority's (GLA) - [www.london.gov.uk](http://www.london.gov.uk).

1.6 Authority and Housing offices:

The Duty Planner Office, First Floor, Hammersmith Town Hall Extension, King Street, Hammersmith, London, W6 9JU (9am to 5pm Monday to Thursday and 9am to 5pm on Friday);

Housing Office, Fulham Town Hall, Fulham Broadway, London, SW6 1ET (9am to 5pm Monday to Friday);

Planning Information Office, Kensington and Chelsea Town Hall, Hornton Street, W8 7NX (8.30am to 5pm Monday to Friday); and

Greater London Authority, City Hall, The Queens Walk, More London, London SE1 2AA (9am to 5pm Monday to Friday).

1.7 Local Libraries:

Hammersmith Library, Shepherds Bush Road, London, W6 7AT (Sunday 11am to 5pm, Monday 10am to 8pm, Tuesday 10am to 8pm, Wednesday 10am to 8pm, Thursday 10am to 8pm, Friday 10am to 5pm and Saturday 10am to 5pm);

Barons Court Library, North End Road Crescent, London, W14 8TG (Monday 10am to 5pm, Tuesday 10am to 8pm, Wednesday 10am to 5pm, Thursday 10am to 8pm, Friday 10am to 5pm and Saturday 10am to 5pm);

Brompton Library, 210 Old Brompton Road, London, SW5 0BS (Monday 9:30am to 8pm, Tuesday 9:30am to 8pm, Wednesday 9:30am to 5pm, Thursday 9:30am to 8pm, Friday 9:30am to 5pm and Saturday 9:30am to 5pm),

Kensington Central Library, Phillimore Walk, London, W8 7RX (Monday 9:30am to 8pm, Tuesday 9:30am to 8pm, Wednesday 9:30am to 5pm, Thursday 9:30am to 8pm, Friday 9:30am to 5pm and Saturday 9.30am to 5pm);

Chelsea Library, Chelsea Old Town Hall, King's Road, London, SW3 5EZ (Monday 9:30am to 8pm, Tuesday 9:30am to 8pm, Wednesday 9:30am to 5pm, Thursday 9:30am to 8pm, Friday 9:30am to 5pm, Saturday 9:30am to 5pm and Sunday 1pm to 5pm); and

Fulham Library, 568 Fulham Road, Fulham SW6 5NX (Sunday 11am to 5pm, Monday 10am to 8pm, Tuesday 10am to 8pm, Wednesday 10am to 8pm, Thursday 10am to 8pm, Friday 10am to 5pm and Saturday 10am to 5pm).

1.8 All comments received within the consultation period will be considered in the preparation of the final SPD, which the authorities will look to adopt in 2012. A statement will be prepared summarising the main issues raised in the consultation and how these issues have informed the final SPD. If you would like more information please call 0208 753 3317 for LBHF enquiries and 0207 361 2092 for RBKC enquiries.

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Sarah Parsons (sp59)

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1.17 Capco own the freehold for both Seagrave Road car park and the Empress State Building and have a lease on the Earl's Court Exhibition Centres. After the 2012 Olympics the Earl's Court Exhibition Centres and the Seagrave Road car park sites are likely to be redeveloped. Transport for London (TfL), who own the freehold to the Lillie Bridge Depot and the land upon which the exhibition halls sit (subject to long leases to Capco), are actively collaborating with adjacent landowners to include their land within the wider redevelopment proposals.

1.18 LBHF own the freehold for the West Kensington and Gibbs Green housing estates. LBHF is undertaking a review of the economic benefits and disbenefits of estate regeneration (known as the 'Estates Regeneration Economic Appraisal') and its initial conclusions are that estate regeneration as part of a wider masterplan, delivers optimum benefits. LBHF, as landowner and being responsible for the estates as housing authority, has accepted and endorsed the conclusions contained within the Estates Regeneration Economic Appraisal, subject to the outcome of further

consultation with local residents and any required consents from the Secretary of State.

1.19 The authorities (in their capacity as planning authorities) previously consulted on this draft SPD which contained three development capacity scenarios. One of these scenarios looked at a development scenario not involving the West Kensington and Gibbs Green estates whereas the other two looked at a comprehensive scenario including the estates. The authorities, having considered the representations received from the previous consultation and the initial conclusions drawn from the economic review, in so far as they are relevant to planning, have prepared this draft SPD. The authorities' preference is that estate regeneration should form part of a comprehensive redevelopment and, accordingly, Key Principle HO1 has been drafted to reflect this. LBHF considers that this key principle is in accordance with, and provides further detail to, the OA site policies set out in Annex 1 of the the Mayor's London Plan (2011) and LBHF's Core Strategy (2011) 'Strategic Policy - FRA' and 'Strategic Site and Housing Estate Regeneration Area - FRA 1'. The authorities now wish to seek views on this key principle, as well as the rest of the SPD. Following the consultation period, the authorities will consider any representations and decide whether it is in the proper planning interests of the boroughs and London to adopt this key principle.

## **Site Context**

### **Overview**

2.0 This chapter gives a broad overview of the physical, economic and social nature of the OA today. It is intended to provide the background information that will be needed to understand the rest of this SPD. This chapter is structured around four broad themes:

- strategic context;
- existing urban form and topographical conditions;
- existing land uses; and
- heritage assets.

2.1 The OA 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). The OA boundary is defined by Warwick Road and the West London Line to the east, West Cromwell Road (A4) to the north, North End Road to the west and Old Brompton Road/Lillie Road to the south.

2.2 The Seagrave Road car park is a parcel of land within the OA situated south of Lillie Road bounded by Seagrave Road and the West London Line. 27.8ha of the site is contained within LBHF and the remaining 9.4ha is contained within RBKC comprising the Earl's Court 1 Exhibition Centre, some vacant land along the railway and some buildings associated with Clear Channel advertising.



## **Strategic Context**

2.3 Figures 2.1 and 2.2 show the strategic context of the OA. The A4, along the north of the OA, is identified in the London Plan (2011) as the 'western wedge'. The Mayor of London has aspirations that this wedge will develop into an important commercial corridor, linking London's largest airport (Heathrow) and the two important commercial centres of The City and the West End.

2.4 The White City Opportunity Area, Park Royal Opportunity Area and Kensal Opportunity Area, all north of the OA, are likely to undergo significant regeneration or redevelopment over the next twenty years.

Figure 2.1: The OA Strategic Context

Figure 2.2: The OA Strategic Context

## Urban Form

2.5 The OA is dominated by the Empress State Building and Earl's Court Exhibition Centres, which are major landmarks on the West London skyline. It is made up of large, impermeable land holdings that lack connections into the surrounding area. The built form, whilst mixed in terms of age and type, is characteristically different from that found in the surrounding areas. For example, many of the buildings in the OA are stand alone structures with large footprints, which create a very different environment from that created by the terraces and mansion blocks found in the surrounding area. This is illustrated in the plan in figure 2.4.

2.6 Furthermore, there are a number of significant barriers to movement within the OA. For example, the West London Line, which runs along the boundary between LBHF and RBKC, forms a physical barrier to movement from east to west and the A4 stops pedestrians who wish to pass from north to south.

2.7 The OA is surrounded by significant heritage assets, including 19 conservation areas, numerous listed buildings and Brompton Cemetery, which is a conservation area, the setting of listed buildings and monuments, a registered 'park and garden' of special historic interest (Grade I listed) and Metropolitan Open Land. For further detail, please see page 39

2.8 Figure 2.3 illustrates the boundary of the OA and the current land ownerships within it. Capco own the freehold for both Seagrave Road car park and the Empress State Building and have a lease on the Earl's Court Exhibition Centres. After the 2012 Olympics the Earl's Court Exhibition Centres and the Seagrave Road car park sites are likely to be redeveloped. Transport for London (TfL) and LBHF are currently discussing the possibility of including land within their ownership within the redevelopment site.

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Figure 2.3: Major Land Owners in the OA

Figure 2.4: Urban structure of the OA and its Surroundings

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## Heritage Assets

2.9 There are 19 conservation areas in and around the OA. One of these is Brompton Cemetery. It forms the setting of listed buildings, a registered 'park and garden' of special historic interest (Grade I listed) and is Metropolitan Open Land.

2.10 There are Character Profiles or Conservation Area Proposals Statements available for each of these conservation areas (with the exceptions of Walham Green, Turneville/Chesson and The Billings). These describe the special interest, character and appearance of each area and in many cases they also include constructive design guidelines to help to preserve or enhance them. Therefore, proposals for the OA will be expected to demonstrate due regard to these documents. Furthermore, in light of the significant heritage assets surrounding the OA, particular attention must be paid to Planning Policy Statement 5: Planning for the Historic Environment (2010).

2.11 The conservation areas in and around the OA are:

- A Philbeach Conservation Area;
- B Nevern Square Conservation Area;
- C Earl's Court Square Conservation Area;
- D Earl's Court Village Conservation Area;
- E Courtfield Conservation Area;
- F Brompton Cemetery;
- G The Boltons Conservation Area;
- H The Billings Conservation Area;
- J Sedlescombe Conservation Area;
- K Walham Grove Conservation Area;
- L The Walham Green Conservation Area
- M Barons Court Conservation Area;
- N Queens Club Conservation Area;
- O Turneville/ Chesson Conservation Area;
- P Olympia and Avonmore Conservation Area;
- Q Dorcas Estate Conservation Area;
- R Fitzgeorge and Fitzjames Conservation Area;
- S The Gunter Estate Conservation Area; and

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T The Edwardes Square/Scarsdale & Abingdon Conservation Area.

[Figure 2.5: Brompton Cemetery](#)

[Figure 2.6: The Boltons](#)

[Figure 2.7: Queens Club Gardens](#)

[Figure 2.8: Surrounding conservation areas, listed buildings and Brompton Cemetery monuments](#)

## **Historical Development**

### **Earl's Court's Origins**

2.12 The OA and its surroundings were once significant landholdings held by notable families such as the De Veres, the Copes, the Rich family and the Edwardes family. The name 'Earl's Court' has been in use since land ownership passed to the Rich family in 1614. The members of this family included the Earls of Warwick and Holland and their estate was governed from a manorial courthouse in the area.

2.13 The area had rural beginnings, as it once comprised of market gardens, brickfields, potteries and nurseries. Housing and other development commenced around the 1770s, following the development of Chelsea to the south.

2.14 The Counter's Creek was one of the tributaries running into the River Thames from Kensal Green. Its alignment ran along what is now the West London Line. Since medieval times it functioned as a natural border, with few early crossings.

### **Early Development & Enterprises**

2.15 One of the first development initiatives was the transformation of the Counter's Creek into Kensington Canal in 1828. However, by the time it was complete the canal was already obsolete as the train had become the preferred mode of transporting freight. The West London Railway was developed in 1844, connecting the area with Clapham Junction. It had a chequered early history, closing due to insufficient patronage after 6 months, only to be re-opened solely to transport coal in 1845, then re-opening as a passenger service in 1863.

2.16 Brompton Cemetery was also an early development in the area. Its grounds were laid out in the 1830s and consecrated in 1840. It features a domed chapel at its southern end, reached by long colonnades and catacombs. The Cemetery was designed to give the feel of a large open air cathedral. It occupies 16.5 hectares of space and is owned and managed by The Royal Parks. It contains a number of Listed Monuments.

2.17 A significant tide of mostly residential development occurred between the 1860s and mid 1890s, which saw some 60 acres of land being redeveloped. Lillie

Road and Fulham Palace Road represented the western edge of this new development in 1893.

2.18 Residential development in the Earl's Court area was supported by the arrival of rail transport during this time. The District Line was the first to arrive, with West Brompton Station opening in 1866, Earl's Court Station in 1871 and Fulham North End Station in 1874 (later to be re-named West Kensington Station). The Piccadilly Line opened in 1906 at Earl's Court. The OA has long been the site of a rail depot and repair sheds (since the 1870s) and the distinctive crescent form of development at Philbeach Gardens and Eardley Crescent were informed by the curving rail tracks of the District and Piccadilly lines.

Figure 2.9: Map of the OA and its surroundings in the 1840s

Figure 2.10: Map of the OA and its surroundings in the 1870s

Figure 2.11: Map of the OA and its surroundings in the 1890s

### **The Exhibition Centres**

2.19 Exhibitions and shows have taken place on the Earl's Court site since the 1880s. These were largely in the form of travelling shows. Temporary halls were built to accommodate them, and these were demolished and rebuilt in 1894 as the Empress Hall and the Empress Theatre.

2.20 Of note from these early exhibitions was the Earl's Court gigantic wheel, erected in 1895. At 300 feet high it was almost as big as the London Eye is today and its 40 wooden cabins carried 1,200 passengers at a time. Although it was widely popular it was demolished 12 years later.

2.21 Earl's Court Exhibition Centre 1 was completed in 1937. It was designed by American architect Charles Howard Crane, and was Europe's biggest structure by volume spanning 250 feet. Its distinctive art deco facade fronted onto a generous forecourt at Warwick Road and still forms a recognisable feature today.

2.22 In 1991 Earl's Court Exhibition Centre 2 was completed. This facility is physically linked with Earl's Court Exhibition Centre 1 and is situated on part of the former Lillie Bridge.

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[Figure 2.12: The view along Longridge Road showing the Earl's Court gigantic wheel in 1895](#)

[Figure 2.13: Earl's Court 1 \(EC1\) today](#)

[Figure 2.14: Earl's Court 2 \(EC2\) today](#)

### **Twentieth Century Development**

[2.23 The Twentieth Century saw the influence of the motorcar on development as well as the effect of the opening of Heathrow Airport on connections between the western periphery of London and its centre.](#)

[2.24 Lillie Road replaced Star Road and Greyhound Road as the main thoroughfare across Fulham when motorised buses were introduced in 1906. In 1957 West Cromwell Road Bridge was built, linking Talgarth Road with West Cromwell Road and creating a stronger connection between Central London and West London. This was strengthened further in 1961 with the construction of the Hammersmith Flyover.](#)

[2.25 The Empress State Building was completed in 1961, originally designed as a hotel. The building was renovated in 2003 and another three floors were added.](#)

[2.26 The Gibbs Green estate was built in 1961 and the West Kensington estate was built between 1972 and 1974.](#)

## **Transport and Accessibility**

2.27 The OA is a transport dominated site with a mix of transport infrastructure adjoining or running through and under it. These include the strategically important West Cromwell Road, which runs along the northern edge of the area and the Earl's Court One Way System (ECOWS) which borders the area on the east (both are part of the Transport for London Road Network (TLRN)). Below street level the West London Line (part of the London Overground Network) runs through the site, separating communities in Hammersmith and Fulham from those in Kensington and Chelsea, whilst around this are the London Underground District and Piccadilly lines.

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2.28 The local transport facilities play an important role in connecting Earl's Court to the rest of London and the UK as a whole but at a local level they do create significant severance, which impacts on local quality of life and accessibility to goods, services and employment.

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2.29 As is the case in most of London there is an extensive pedestrian footway network along existing local streets and roads. However there are some areas where the quality of this network discourages walking, with poor maintenance, excessive street clutter, inconvenient pedestrian crossings and an inappropriate balance between the needs of pedestrians and vehicles. This, along with the severance caused by the West London Line, the District line and the Earl's Court Exhibition Centres, creates a barrier to north-south and particularly east-west pedestrian and cycle movement through the OA. This isolates the OA, reduces the attractiveness of walking and cycling and restricts access to local public transport. West Cromwell Road, running along the north side of the site, creates severance between the OA and the residential areas to the north.

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2.30 Once off the busiest primary roads the majority of streets surrounding the OA represent a safe and attractive environment for pedestrians and cyclists, although the system of one-way local roads, designed to discourage vehicles from rat running, does cause inconvenience for cyclists and cycle parking facilities are inadequate.

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2.31 The OA is served by three London Underground stations; Earls Court, West Brompton and West Kensington. These stations provide access to the District and Piccadilly lines. West Brompton is also served by the Overground network. The edges of the OA are thus well served with a high Public Transport Accessibility Level (PTAL), but the centre has a low PTAL of just 2.

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2.32 The London Underground lines serving the OA are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly lines in the AM peak. Significant increases in capacity are planned and funded for the District and Piccadilly lines as part of the London Underground upgrades. The District line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is no definite date for the upgrade of the Piccadilly line, which would provide a capacity increase of 25%, although it is expected to be complete prior to 2031. Crossrail is planned to open in 2018, which will release capacity on the Central line, which in turn will draw passengers from the Piccadilly line, thereby releasing some limited capacity.

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2.33 All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancements. In addition crowding will increase to over three people per square metre on all southbound services to West Brompton.

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2.34 All the boundary roads carry very high levels of traffic and operate at, or near, capacity in the peak periods. The dominant traffic flows are east-west on West Cromwell Road (around 6,000 vehicles in the peak periods) and north-south on the ECOWS (around 2,000 southbound and 1,000 – 1,500 northbound). The majority of traffic signals in the area operate on the SCOOT system to better optimise junction capacity, although, given the dominance of east-west traffic on the local road network, priority is given to this movement at the junctions along West Cromwell Road.

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2.35 There are a significant number of traffic delay hotspots in and around the OA, including at all four corners of the site, during both peak periods as well as the weekend. This is particularly apparent at the West Cromwell Road junctions with Warwick Road and North End Road, the whole length of which is subject to delays. Delay is generally highest during the PM peak period, particularly on West Cromwell Road between the Warwick Road and Earl's Court Road junctions.

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2.36 Both West Cromwell Road and the ECOWS have negative impacts on the ease and attractiveness of pedestrian and cyclist movement, residential amenity, access to bus services and the townscape of the areas through which they run, including the OA.

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2.37 The existing site includes 2,500 car parking spaces, primarily for the use of exhibitors and visitors to the Exhibition Centre although some public parking also takes place. On-street in Kensington and Chelsea there is a mixture of residents' and pay and display parking with limited spare capacity. In Hammersmith and Fulham the available parking for visitors is greater because dual use parking bays are provided.

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Figure 2.15: Public Transport Infrastructure in and around the OA

## Topographical and Environmental Conditions

2.38 The OA has some very distinctive changes in ground levels, often as a result of the railway infrastructure. There is a significant change in ground level from the east of the OA to the west in order to provide clearance over the West London Line. The ground level is highest under Earl's Court Exhibition Centre 1 where the Wimbledon Branch of the District Line passes underground. There is also a significant drop in level along the northern edge of the OA, from the A4 flyover in the north east to the traffic junction in the north west. The Ealing Broadway and Richmond branches of the District Line are contained within a steep cutting that runs alongside the northern boundary of the OA.

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Figure 2.16: Diagram Indicating the changes in topography across the site

2.39 Much of the OA is located in an area of high flood risk (Flood Zone 3), as identified by the Environment Agency, and the area is susceptible to sewer/stormwater and potentially surface water flooding. Figure 2.17 illustrates the flood risk zones in the area.

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2.40 The OA is also within an Air Quality Management Area and currently includes some areas of poor air quality which are predominantly located along the roads surrounding the OA.

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Figure 2.17: Flood Risk Zones in and around the OA

## Building Heights

2.41 There are three significant tall buildings within the OA; the 31 storey Empress State Building; Earl's Court 1 which is a maximum height of 63m AOD; and Earl's Court 2. These are located on the eastern side of the OA. Buildings of these heights are atypical in the immediate surroundings.

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2.42 Other buildings with significant height in the OA are dispersed more widely. Ashfield House to the north and the four council blocks on the west rise to between 9 and 11 storeys. The heights across the rest of the site are between 2 and 6 storeys and are more closely related to those prevailing in the surrounding area (figure 2.8).

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2.43 In the surrounding area, building heights are related to building typology. The important residential typologies found around the OA include town houses, terraced town houses, mansion blocks, mews houses and infill blocks.

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Figure 2.18: Building heights in the OA and its surroundings

## Open Space

2.44 There is an identifiable pattern of open space in the OA's surroundings. This consists of:

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- formal **garden squares**, which are usually lined on one or two sides by buildings and are predominantly 'semi private' (accessible only to those who contribute to their upkeep). However, they do provide important public visual amenity;
- **Communal gardens** which are usually located between two terraces and shared by the residents of the terraces that define them. As either end of the communal gardens are left open to the street, they also provide public visual amenity; and
- **Private rear gardens** relating to specific dwellings and accessible only to their inhabitants.

2.45 These contribute to the urban structure of the area, creating a rich rhythm of terraced buildings and open spaces.

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2.46 Of further note is the Counter's Creek, one of London's 'lost rivers'. This former natural stream was first artificially channelled in 1827, when it started to become an integral part of London's sewerage infrastructure, and is now fully culverted.

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Figure 2.19: Open spaces in and around the OA

2.47 Within the OA there is one identified area of biodiversity importance; a semi-natural green corridor running alongside the West London Line (more or less on the boundary between LBHF and RBKC). It has been classified as a Site of Nature Conservation Importance (Grade 1) in LBHF, although some of the corridor straddles the boundary into RBKC.

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2.48 Figure 2.20 shows the sites of nature conservation importance in the vicinity of the OA.

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2.49 Figure 2.21 illustrates that there is significant deficiency of publicly accessible open space within the OA itself.

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Figure 2.20: Sites of Borough and Local Importance in and around the OA

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Figure 2.21: Open Space distribution in and around the OA

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2.50 In terms of existing public provision, Normand Park, which is located to the south west of the OA, provides two hectares of public open space. To the south east of the OA is Brompton Cemetery. Whilst this is publicly accessible, it cannot be regarded as recreational open space in the usual sense and is therefore not considered to contribute to combating open space deficiency. Within the OA itself are several small pockets of publicly accessible open space, which are used for leisure and some children's play. These spaces are small, fragmented and are of a poor quality as they are incidental space left over following the design of the estates in the 1970s. The Core Strategies for both local authorities identify much of the OA as deficient in publicly accessible open space, as shown in Figure 2.21. This deficiency reflects the lack of a large publicly accessible local park in this area.

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2.51 Existing play provision is limited to the western extremities of the OA. Facilities for under 5s in the area are generally poor, consisting primarily of provision on housing estates, with the exception of the playspace in Normand Park. Two of these play spaces are on the West Kensington and Gibbs Green estates, which would be lost if estate redevelopment were to occur. Play provision for 5-11s is generally good. Two of the play spaces are on the West Kensington and Gibbs Green estates, which would be lost of estate redevelopment were to occur. The provision for over 12s is good, consisting of the play spaces at Normand Park and two basketball courts on the West Kensington and Gibbs Green estates, which would again be lost if estate redevelopment were to occur. Of all the 8 play spaces in the vicinity of the OA only the play spaces at Normand Park and Alice Gilliat can be considered genuinely public, with the other six contained within housing estates.

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Table 2.1: The play spaces that serve and are accessible to the OA

## Land Use

2.52 Figure 2.22 shows the current ground floor land uses in and around the OA.

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2.53 The 31 storey Empress State Building is situated immediately to the west of Earl's Court 2 and is the tallest building within the OA and indeed in much of West London. The building is currently occupied by the Metropolitan Police. To the north of Earl's Court Exhibition Centre 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 OA.

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2.54 The West Kensington and Gibbs Green housing estates lie to the west of the Earl's Court Exhibition Centres and the TfL Lillie Bridge Depot. The larger West Kensington estate, containing 604 properties, was built between 1972 and 1974 and includes several slab blocks of 9, 10 and 11 storeys along with low rise flats, maisonettes and terraced houses. The smaller Gibbs Green estate features 98 properties built in 1961 comprising 7 medium-rise blocks. The estates have poorly arranged internal roads and irregular placement of buildings surrounded by poorly utilised open space, particularly on the West Kensington estate. On-street and forecourt parking spaces dominate the streetscape of the estates. The overall proportion of social rented housing on the estates is 78 percent.

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2.55 To the south of the OA is the Seagrave Road car park, which is a parcel of land situated adjacent to the West London Line. It covers an area of 2.9ha featuring a small number of temporary and semi-permanent utility structures.

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2.56 There are a number of other smaller and/or ancillary land uses within the OA, namely:

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- Gibbs Green school, which was previously a primary school but is currently being used to temporarily house Queensmill Special School;
- private residential houses, flats and maisonettes on Empress Place, Lillie Road and Seagrave Road;
- Registered Provider properties located around the West Kensington and Gibbs Green estates;
- a range of A1–A5 uses along Lillie Road, North End Road, Old Brompton Road and Seagrave Road, some with converted residential flats on the upper floors;
- a hotel, community centre and telephone exchange north of Lillie Road;
- a small area of commercial and light industrial uses to the south of Lillie Road;

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- a bus turning and waiting facility on Lillie Road immediately adjacent to Earl's Court2 and the Empress State Building; and
- the Clear Channel buildings and hoardings, plus laundry and mannequin- making facilities located south of West Cromwell Road.

| Figure 2.22: Ground floor land uses in the OA and its surroundings

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## Housing

2.57 The area surrounding the OA is typically characterised by Victorian terraced housing and Edwardian mansion blocks, which are generally owner occupied or privately rented. There are also some post-war housing estates located to the east and north of the OA and some modern, purpose built residential premises to the north.

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2.58 Within the OA, existing housing is primarily located within the West Kensington and Gibbs Green estates. Some properties are now leasehold or freehold having been purchased under the 'right to buy' scheme. Some private residential accommodation is also located to the south of the OA, on Empress Place, Lillie Road and Seagrave Road.

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2.59 The West Kensington Estate was built between 1972 and 1974 and contains 604 dwellings. This consists of 463 flats and 141 terraced houses. 476 of the dwellings are socially rented, 89 are leasehold and 39 are freehold. The majority of dwellings are a mix of 1 and 2 bedroom flats, along with some larger 3 and 4 bedroom maisonettes and houses.

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2.60 The Gibbs Green Estate was built in 1961 and contains 98 flats and maisonettes. 42 of these dwellings are leasehold. The remaining 56 dwellings are socially rented. All of the dwellings are 2 and 3 bedroom units.

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2.61 In addition to the estate properties, a number of Housing Associations own property within the OA. Family Mosaic owns 42 homes in Dieppe Close, Lerry Close and Thaxton Road; London and Quadrant own 9 properties in Aisgill Avenue and Marchbank Road; and Shepherds Bush Housing Association own 7 properties in Garsdale Terrace. All of the Housing Association properties in the Opportunity Area are social rented.

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2.62 Altogether, social rented housing comprises 78% of the total number of properties on the estates and Housing Association land. The rest of the properties (22%) have been bought by residents under the 'right to buy' scheme.

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2.63 Table 2.2 shows the existing housing provision on the West Kensington and Gibbs Green Estates, along with other Housing Association provision in the area. Table 2.3 shows the tenure profile of the estates compared to other geographies.

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Table 2.2: Housing Size and Tenure within the existing estates and Registered Provider properties  
Source: West Kensington and Gibbs Green Estate Profile July 2010

Table 2.3: Comparison of tenure profile  
Source: West Kensington and Gibbs Green Estate Profile July 2010 for Estate Data. Census 2001 for all other geographies.

Figure 2.23: Photograph of a housing block within the West Kensington Estate

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Figure 2.24: Photograph of a housing block within the Gibbs Green Estate

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## Social and Community Facilities

### Education

2.64 Figure 2.15 shows the locations of nursery, primary and secondary education provision within the vicinity of the OA. The former Gibbs Green primary school is located within the OA. This is currently being used as accommodation by a special school. There is an independent nursery to the south of the estates called the Kiddi Karu Nursery. LBHF's Infrastructure Study 2010 shows that current primary and nursery school provision in the area is at capacity.

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### Health

2.65 Figure 2.26 shows the locations of hospitals, health centres and GP facilities within the vicinity of the OA. Within the OA itself there is a GP facility located at 82 Lillie Road which provides 10 consulting rooms. As part of NHS Hammersmith and Fulham's Estate Strategy, a new Centre for Health has opened on North End Road opposite the OA. This facility provides 1,200sqm of health floorspace and 10 consulting rooms and has been provided in order to facilitate the relocation of other GP facilities in the borough rather than increasing healthcare capacity in order to meet the needs of any regeneration proposals in the area.

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Figure 2.25: The locations of nursery, primary and secondary education provision within the vicinity of the OA

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Figure 2.26: The locations of hospitals, health centres and GP facilities within the vicinity of the OA

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## Retail

Figure 2.27: Retail centres in the vicinity of the OA

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2.66 Figure 2.27 shows that there are three shopping areas within the vicinity of the OA. The largest of these is Fulham Town Centre, which is designated as a Major Town Centre in the London Plan (2011) and extends to within the OA boundary. To the east of the OA is Earl's Court Road, designated in RBKC's Core Strategy (2010) as a Neighbourhood Centre and in the London Plan (2011) as a District Centre. To the north-west of the OA is the North End Road (West Kensington) Key Local Shopping Centre. To the north-west of the OA is the North End Road (West Kensington) Key Local Shopping Centre and to the east of the OA is Old Brompton (West) Neighbourhood Centre.

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2.67 Fulham Town Centre is situated at the southern end of North End Road and extends from Lillie Road to Fulham Broadway. Its main activity shopping (including the busy North End Road Market) and services for the local Fulham community. The centre has traffic congestion and car parking problems and has suffered from competition with surrounding centres (including Kensington High Street and Putney) and out of centre stores in Cromwell Road (Waitrose), Townmead Road (Sainsbury's) and Warwick Road (Tesco's). It has lost not only elements of its retail business, particularly at the northern end of the centre, but also recreation and entertainment uses. Despite this situation, the centre has managed to attract a number of new retailers, food and drink establishments and cinemas and continues to provide an important focus for many residents.

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2.68 Earl's Court Road is designated as a Neighbourhood Centre within RBKC's adopted Core Strategy (2010); a designation which recognises its scale and its primary function of serving the day-to-day needs of local people and those visiting the Exhibition Centres. It remains a vibrant centre providing a diverse range of shops, restaurants, cafes and pubs. However, the centre has an 8.9% vacancy rate, which is higher than some other centres in the borough.

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2.69 The North End Road (West Kensington) Key Local Shopping Centre also has a local function, providing a range of convenience shops and other services. In 2008, 54% of the uses within the centre fell within the A1 Use Class and there was a 12% vacancy rate. There is also some out of centre retail along the west side of North End Road, linking Fulham Town Centre with North End Road (West Kensington).

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2.70 Old Brompton Road (West) is designated as a Neighbourhood Centre within RBKC's Core Strategy (2010). This centre is predominantly linear, running along Old Brompton Road between the junctions of Warwick Road and Earl's Court Road. The centre caters for local need, although it also provides a specialist comparison role in the form of DIY and interior design shops. The centre is generally attractive, with well kept shopfronts, wide pavements and limited street clutter. However, there is currently a 10% vacancy rate.

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2.71 Further away from the OA there are several very important and successful higher order centres, such as Shepherd's Bush (including Westfield), Hammersmith, Kensington High Street, Notting Hill and King's Road. In addition to the local convenience function, these centres are also important comparison shopping destinations with a catchment that includes the OA.

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## Socio-Economic Conditions

2.72 In 2007 most of the OA fell within the 30 percent most deprived areas in England as indicated by the Index of Multiple Deprivation (figure 2.28). The North End and Fulham Broadway wards are both ranked within the 10 percent most deprived wards in England with respect to income levels and barriers to housing and services. In particular, the Gibbs Green and West Kensington estates are both in the 10 percent most deprived neighbourhoods in LBHF, experiencing the highest levels of income and employment deprivation and very significant housing and services deprivation.

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2.73 Neighbourhoods within the Earl's Court Ward by comparison are significantly less deprived on average, although this represents one of the lower income wards in RBKC outside of North Kensington.

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2.74 The OA also suffers from higher unemployment than surrounding areas, with 22 percent of residents on the Gibbs Green Estate and 28 percent of residents on the West Kensington Estate claiming welfare benefits, compared to a LBHF average of 14 percent. There are also more long-term unemployed residents, with approximately 40 percent of unemployed residents claiming benefits for a period longer than 6 months compared to the LBHF average of 30 percent.

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2.75 With regard to health, the residents of the Gibbs Green and West Kensington estates suffer from below average health outcomes and the area generally suffers from health deprivation.

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2.76 Educational attainment on the West Kensington and Gibbs Green estates is significantly lower than the ward averages, with almost one third of adult residents having no qualification at all. LBHF audits of the Gibbs Green and West Kensington estates show that in 2008, 30 percent of the working age population had no educational qualifications and only 31 percent in the Gibbs Green Estate and 20 percent in the West Kensington Estate had university level qualifications (level 4 and 5 qualifications).

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Figure 2.28: Index of Multiple Deprivation ranking in and around the OA

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## Culture

2.77. The culture, leisure and entertainment value of the OA is provided within the Earl's Court Exhibition Centres One and Two. Over the years the Exhibition Centres have hosted numerous nationally and internationally renowned events / shows (such as the Motor Show, London Boat Show, Royal Agricultural Show, 'Crufts', the Royal Tournament, Ideal Home Show, BRIT Awards), musicians / bands (such as Take That, Pink Floyd, The Rolling Stones, Madonna, Queen, David Bowie, Kylie Minogue, and many more) and opera (such as Carmen and Aida). The Exhibition Centres will host the indoor volleyball during the 2012 Olympic Games.

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2.78. Earl's Court Exhibition Centre 1 has an exhibition area of approximately 40,000m<sup>2</sup>, with a maximum capacity of 30,000 people. Earl's Court Exhibition Centre 2 has an exhibition area of approximately 17,000m<sup>2</sup>, with a maximum capacity of 12,000 people. The two centres also provide additional smaller exhibition, meeting and conference space in separate accommodation within the buildings.

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2.79. The Exhibition Centres attract approximately 3 million visitors and 30,000 exhibitors each year. This major attraction makes a significant contribution to the local community, benefiting local hotels, restaurants, bars, taxi firms and local business who have adapted to cater for the needs of the exhibition centres.

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2.80. Figure 2.19 shows the location of hotels in and around the OA. There is a high concentration of hotels within the vicinity of the OA and one hotel located within the OA itself at 295 North End Road.

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Figure 2.29: Existing hotel provision in and around the OA

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**Deleted:** Figure 2.20: (Left) Brompton Cemetery

¶  
2.62 · There are 18 conservation areas in and around the OA. One of these is Brompton Cemetery. It forms the setting of listed buildings, a registered 'park and garden' of special historic interest (Grade I listed) and is Metropolitan Open Land. .

¶  
2.63 · The conservation areas in the area surrounding the OA are:

A · Philbeach Conservation Area;

B · Nevern Square Conservation Area;

C · Earl's Court Square Conservation Area;

D · Earl's Court Village Conservation Area;

E · Courtfield Conservation Area;

F · Brompton Cemetery;

G · The Boltons Conservation Area;

H · The Billings Conservation Area;

J · Sedlescombe Conservation Area;

K · Walham Grove Conservation Area;

L · The Walham Green Conservation Area

M · Barons Court Conservation Area;

N · Queens Club Conservation Area;

O · Turneville/ Chesson Conservation Area;

P · Olympia and Avonmore Conservation Area;

Q · Dorcas Estate Conservation Area;

R · Fitzgeorge and Fitzjames Conservation Area; and

S · The Gunter Estate Conservation Area.

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Figure 2.21: Surrounding conservation areas and listed buildings

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Figure 2.20: (Left) Brompton Cemetery

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- H The Billings Conservation Area;
- J Sedlescombe Conservation Area;
- K Walham Grove Conservation Area;
- L The Walham Green Conservation Area
- M Barons Court Conservation Area;
- N Queens Club Conservation Area;
- O Turneville/ Chesson Conservation Area;
- P Olympia and Avonmore Conservation Area;
- Q Dorcas Estate Conservation Area;
- R Fitzgeorge and Fitzjames Conservation Area; and
- S The Gunter Estate Conservation Area.

Figure 2.21: Surrounding conservation areas and listed buildings

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## Historical Development

### Earl’s Court’s Origins

2.64 The OA and its surroundings were once significant landholdings held by notable families such as the De Veres, the Copes, the Rich family and the Edwardes family. The name ‘Earl’s Court’ has been in use since land ownership passed to the Rich family in 1614. The members of this family included the Earls of Warwick and Holland and their estate was governed from a manorial courthouse in the area.

2.65 The area had rural beginnings, as it once comprised of market gardens, brickfields, potteries and nurseries. Housing and other development commenced around the 1770s, following the development of Chelsea to the south.

2.66 The Counter's Creek was one of the tributaries running into the River Thames from Kensal Green. Its alignment ran along what is now the West London Line. Since medieval times it functioned as a natural border, with few early crossings.

### **Early Development & Enterprises**

2.67 One of the first development initiatives was the transformation of the Counter's Creek into Kensington Canal in 1828. However, by the time it was complete the canal was already obsolete as the train had become the preferred mode of transporting freight. The West London Railway was developed in 1844, connecting the area with Clapham Junction. It had a chequered early history, closing due to insufficient patronage after 6 months, only to be re-opened solely to transport coal in 1845, then re-opening as a passenger service in 1863.

2.68 Brompton Cemetery was also an early development in the area. Its grounds were laid out in the 1830s and consecrated in 1840. It features a domed chapel at its southern end, reached by long colonnades and catacombs. The Cemetery was designed to give the feel of a large open air cathedral. It occupies 16.5 hectares of space and is owned and managed by The Royal Parks. It contains a number of Listed Monuments.

2.69 A significant tide of mostly residential development occurred between the 1860s and mid 1890s, which saw some 60 acres of land being redeveloped. Lillie Road and Fulham Palace Road represented the western edge of this new development in 1893.

2.70 Residential development in the Earl's Court area was supported by the arrival of rail transport during this time. The District Line was the first to arrive, with West Brompton Station opening in 1866, Earl's Court Station in 1871 and Fulham North End Station in 1874 (later to be re-named West Kensington Station). The Piccadilly Line opened in 1906 at Earl's Court. The OA has long been the site of a rail depot and repair sheds (since the 1870s) and the distinctive crescent form of development at Philbeach Gardens and Eardley Crescent were informed by the curving rail tracks of the District and Piccadilly lines.

Figure 2.22: Map of the OA and its surroundings in the 1840s

Figure 2.23: Map of the OA and its surroundings in the 1870s

Figure 2.24: Map of the OA and its surroundings in the 1890s

### **The Exhibition Centres**

2.71 Exhibitions and shows have taken place on the Earl's Court site since the 1880s. These were largely in the form of travelling shows. Temporary halls were built to accommodate them, and these were demolished and rebuilt in 1894 as the Empress Hall and the Empress Theatre.

2.72 Of note from these early exhibitions was the Earl's Court gigantic wheel, erected in 1895. At 300 feet high it was almost as big as the London Eye is today and its 40 wooden

cabins carried 1,200 passengers at a time. Although it was widely popular it was demolished 12 years later.

2.73 Earl's Court Exhibition Centre 1 was completed in 1937. It was designed by American architect Charles Howard Crane, and was Europe's biggest structure by volume spanning 250 feet. Its distinctive art deco facade fronted onto a generous forecourt at Warwick Road and still forms a recognisable feature today.

2.74 In 1991 Earl's Court Exhibition Centre 2 was completed. This facility is physically linked with Earl's Court Exhibition Centre 1 and is situated on part of the former Lillie Bridge.

Figure 2.25: The view along Longbridge road showing the Earl's Court gigantic wheel in 1895

Figure 2.26: Earl's Court 1 (EC1) today

Figure 2.27: Earl's Court 2 (EC2) today

### **Twentieth Century Development**

2.75 The Twentieth Century saw the influence of the motorcar on development as well as the effect of the opening of Heathrow Airport on connections between the western periphery of London and its centre.

2.76 Lillie Road replaced Star Road and Greyhound Road as the main thoroughfare across Fulham when motorised buses were introduced in 1906. In 1957 West Cromwell Road Bridge was built, linking Talgarth Road with West Cromwell Road and creating a stronger connection between Central London and West London. This was strengthened further in 1961 with the construction of the Hammersmith Flyover.

2.77 The Empress State Building was completed in 1961, originally designed as a hotel. The building was renovated in 2003 and another three floors were added.

2.78 The Gibbs Green estate was built in 1961 and the West Kensington estate was built between 1972 and 1974.

## Vision and Objectives

### Vision

3.1 This vision reflects and is based on the aspirations for the OA of LBHF, RBKC and the Mayor of London, as established by both boroughs' Core Strategies and the Mayor's London Plan. It is not intended to exclude any acceptable development options which would accord with the London Plan and the Core Strategies. The vision has been drafted with this in mind and would apply to any application coming forward in the OA.

#### "West London's New Urban Quarter"

**Deleted:** This vision reflects the aspirations for the OA of LBHF, RBKC and the Mayor of London, as established by both boroughs' Core Strategies and the Mayor's London Plan.¶

3.2 "Residential led regeneration of the OA will result in a world class, environmentally sustainable new urban quarter that people will want to live in, work in and visit. The new community will be mixed and diverse, with quality housing provided to meet a range of incomes and contribute to the Capital's needs and potential for growth.

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3.3 The new urban quarter will capture the spirit of this part of London by continuing the legacy of the Earl's Court 'brand' with a new cultural destination that will continue to draw visitors from across the Capital.

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3.4 It will be integrated into the existing urban fabric and character of the surrounding area, respecting the heritage assets and the pattern of streets, buildings and open spaces. The environment created will be of high quality throughout, adopting the best of typical West London character and complementing it with the best of contemporary design. It will provide safe, stimulating, well managed neighbourhoods that are attractive, exciting and served by a first class, well connected network of streets and open spaces that encourage walking and cycling. For the first time in the OA, the two neighbouring boroughs will be connected through improved east-west connections.

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3.5 The redevelopment of the area will incorporate sensitively designed, publicly accessible, green, open spaces, including a number of garden squares. They will offer a range of opportunities for both formal and informal play and recreation as well

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as enhancing the ecological value of the area. All public open spaces, play spaces, streets and buildings will be inclusive and accessible.

~~3.6~~ There will be a substantial increase in the number of homes in the area, with new housing for sale and rent at a range of prices and affordability. The Gibbs Green and West Kensington estates will be regenerated, with existing residents benefiting from greater housing choice, and higher quality, more suitable homes, designed with their needs in mind. All existing residents will be able to continue living in the area if they choose to do so, and the existing community will be enriched with a more varied, balanced and sustainable socio-economic mix.

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~~3.7~~ Many people will choose to both live and work in the area, reducing the need for commuting and the subsequent demand on the public transport and road networks. Improvements to the road and public transport networks will be made to ensure that the impacts of development are minimised.

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~~3.8~~ The new urban quarter will make the most of its enviable location on the A4, equidistant between London's largest international airport at Heathrow, and London's economic heart in the West End and the City. As a result it will become an attractive and high profile location for both large and small businesses, from start-ups to established institutions.

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~~3.9~~ Regeneration will have overwhelmingly positive effects in the surrounding area, increasing the economic health of local businesses, town and local centres and contributing to local employment and community needs, with a high proportion of the new jobs created being filled by local people.

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~~3.10~~ The economic health of this part of North End Road will be revived with new shops, restaurants and services opening on its eastern side to create a two sided shopping street. Other retail and services to meet the day to day needs of new residents and workers will cluster around the existing tube stations on the edges of the OA and in a new centre within it. This new retail will complement rather than compete with existing retail centres, through careful management.

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~~3.11~~ The new urban quarter will provide a number of community facilities to support the new living and working populations. This will include a new community hub with space to accommodate a range of multi functional community uses. The

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*new quarter will also be supported by a new primary and secondary school, a health centre, affordable sports and leisure facilities and police infrastructure.*

*3.12 Outstanding environmental performance will be achieved by the use of low and zero carbon technologies, including renewable energy sources, a district heat network and combined heat and power. Sustainable approaches to mitigating waste, water management and controlling noise and air quality will also be introduced.”*

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## Key Objectives

### 3.13 Urban Form

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- Establish an **urban grain** within the OA that is inspired by the surrounding pattern of streets and open spaces;
- Maximise **connectivity**;
- Provide good quality **public open space** that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;
- Ensure that new buildings on the **edges** of the OA are sensitively integrated into and enhance the existing context;
- Ensure that no new buildings visible on the **skyline** have a negative impact on the quality and character of the surrounding townscape; and
- Design well proportioned **streets** that respond to those in the surrounding area and encourage walking and cycling.

### 3.14 Housing

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- Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

### 3.15 Employment

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- Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

### 3.16 Retail

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- New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and
- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

### 3.17 Culture

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- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

### 3.18 Social and Community facilities

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- Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

### 3.19 Transport

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- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

### 3.20 Energy

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- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

### 3.21 Environment

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- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;

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- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

### 3.22 Section 106 and Phasing Strategy

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- Ensure a comprehensive approach to redevelopment of the OA; and
- Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.

Figure 3.1: Illustrative diagram showing the main urban form aspirations that could be delivered as part of comprehensive regeneration of the OA. For illustrative purposes only.

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Figure 3.2: Illustrative diagram illustrating different land uses that could be delivered as part of comprehensive regeneration of the OA. For illustrative purposes only.

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Figure 3.3: Illustrative masterplan showing one possible way in which the Vision and Key Objectives could be achieved in the OA. More explanation of this illustrative masterplan can be found in the Development Capacity Scenarios SPD Supporting Document. For illustrative purposes only.

Figure 3.4: Illustrative masterplan showing one possible arrangement of ground floor land uses. For illustrative purposes only.

Figure 3.5: Illustrative masterplan showing one possible arrangement of upper floor land uses. For illustrative purposes only.

## Urban Form

### Overview

#### Key Objectives

- **Maximise connectivity;**
- **Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces;**
- **Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;**
- **Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context;**
- **Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape; and**
- **Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.**

4.0 This Urban Form Strategy establishes a spatial framework, based on six Key Objectives (left) to deliver a quality new urban quarter.

4.1 The Key Principles are set out under each Key Objective and are followed by diagrams and photographs to suggest how they could be achieved. At the end of this chapter there is also guidance on how the OA could be divided into a number of different illustrative development parcels, each delivering the appropriate Key Objectives.

4.2 This Urban Form Strategy is supported by the following SPD Supporting Evidence Documents:

- Character Area Analysis;
- Townscape and Visual Analysis;
- Edges Study; and
- Development Capacity Scenarios.

**Deleted:** how each Key Objective could be delivered in a phased manner, including brief descriptions of the contingencies that would be necessary in order to deliver each objective during the appropriate phase. ¶

## Context

4.3 The OA itself is dominated by the Empress State Building, the Earl's Court Exhibition Centres and railway infrastructure. The surrounding area consists of a much more finely grained urban structure with a number of formal garden squares, communal gardens and private rear gardens. The predominant residential building typologies around the OA include town houses, terraced town houses, mansion blocks, mews houses and infill blocks.

4.4 Within the OA there are a number of significant barriers to movement, particularly the West London Line which runs along the boundary between LBHF and RBKC and prevents east-west connectivity between the boroughs. The OA also features some very distinctive topographical conditions formed by the railway infrastructure.

4.5 In and around the OA a significant deficiency of publicly accessible open space has been identified.

4.6 There are 19 conservation areas in and around the OA, including Brompton Cemetery. There are also a number of sensitive long distance views, particularly those identified in the RBKC Building Heights SPD, which may be effected by development in the OA. Any development will be required to respect the character and appearance of its surroundings, and all heritage assets.

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## Policy Context

### 4.7 The Mayor's London Plan (2011):

- 'Quality and design of housing developments' (Policy 3.5);
- 'Children and Young People's Play and Informal Recreation Facilities' (Policy 3.6);
- 'Large residential developments' (Policy 3.7);
- 'Building London's neighbourhoods and communities' (Policy 7.1);
- ['An Inclusive Environment' \(Policy 7.2\):](#)
- ['Designing Out Crime' \(Policy 7.3\):](#)
- 'Local Character' (Policy 7.4);
- 'Public Realm' (Policy 7.5);
- Location and design of tall and large buildings' (Policy 7.7);
- 'Heritage assets and archaeology' (Policy 7.8);
- 'Heritage-led regeneration' (Policy 7.9);
- 'Implementing the London View Management Framework' (Policy 7.12); and
- 'Protecting Local Open Space and Addressing Local Deficiency' (Policy 7.18).

### 4.8 LBHF's Core Strategy (2011):

- 'Built Environment' (Policy BE1);
- 'Strategic Site and Housing Estate Regeneration Area - FRA 1'; and
- 'Improving and Protecting Parks and Open Spaces' (Policy OS1).

### 4.9 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' (Policy CA7);
- 'Biodiversity' (Policy CE4);
- 'Context and Character' (Policy CL1);
- 'New Buildings, Extensions and Modifications to Existing Buildings' (Policy CL2);
- 'Heritage Assets - Conservation Areas and Historic Spaces' (Policy CL3);
- 'Heritage assets – Listed Buildings, Scheduled Ancient Monuments and Archaeology' (Policy CL4);
- 'Amenity' (Policy CL5);

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- 'Street Network' (Policy CR1);
- 'Three-dimensional Street Form' (Policy CR2);
- 'Street and Outdoor Life' (Policy CR3);
- 'Streetscape' (Policy CR4);
- 'Parks, Gardens, Open Spaces and Waterways' (Policy CR5);
- 'Trees and landscape' (Policy CR6); and
- 'Servicing' (Policy CR7).

4.10 RBKC's **'Building Height in the Royal Borough' SPD**

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4.11 English Heritage's and CABE's Guidance on Tall Buildings (2007).

4.12 English Heritage's 'The Setting of Heritage Assets' (2011).

**Connectivity and Urban Grain**

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Figure 4.1: Illustrative diagram showing the potential to establish maximum connectivity and a suitable urban grain within the OA

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**Key Objective**

Maximise connectivity.

4.13 At present, the OA can be thought of as an 'island' in the urban fabric. It is so disconnected that there is no way for people to move across it directly between the two boroughs. Severance is caused by the railway lines, the Exhibition Centres and the changes in ground level that currently exist across the OA.

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**Key Objective**

Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces.

4.14 It is easier for people to find their way around an area when the design of streets responds directly to their role in a well defined street hierarchy. There is already a well defined street hierarchy surrounding the OA (see Figure 4.2) into which the new streets will be expected to integrate.

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**Key Principle UF1:**

Introduce a number of new east-west and north-south connections across the OA that overcome the existing severance.

**Key Principle UF2:**

Create east-west connectivity between Warwick Road and North End Road at an early phase of development.

4.15 Overcoming the existing severance is one of the fundamental aims of regeneration in the OA. Figures 4.36 to 4.39 suggest an approach to parcelling up the development in a manner that could achieve east-west connectivity in an early phase.

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4.16 Even if comprehensive regeneration of the entire OA never happens, the authorities will expect east-west connectivity to be delivered. Therefore, any

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application for development within the OA will be expected to contain contingency plans that demonstrate how this can be achieved if later phases are not progressed.

**Key Principle UF3:**

Establish a clear and well defined network of streets providing a variety of environments and a choice of routes. The urban grain of new streets should be inspired by the street types and patterns identified in the best of the surrounding context.

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4.17 Proposals that replicate the distinctive street alignments found in the OA's surroundings are encouraged.

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4.18 The existing street hierarchy can be categorised into Primary, Secondary and Tertiary Streets. Primary Streets define neighbourhoods and connect them with the wider city. Secondary Streets form the majority of the urban grain and subdivide the neighbourhoods into urban blocks. Tertiary Streets create extra local connections.

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4.19 The Primary Streets that currently surround the OA should be sufficient to define the new neighbourhood and connect it with the wider city. Therefore, in order to establish a suitable urban grain in the OA, no new Primary Streets will be expected. However, in traffic capacity terms some streets may become more dominant than others and should be designed accordingly, with due care being taken to avoid the creation of new vehicular 'rat runs'. A number of new Secondary and Tertiary Streets should be provided.

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4.20 New Secondary Streets should form a permeable, generally orthogonal grid (i.e. a grid that is based on right angles and perpendicular streets). The existing street patterns in the surrounding area tend to have a number of strong, orthogonal east-west connections and fewer, often more broken up, north-south connections.

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4.21 New Tertiary Streets should ensure that the urban grain is fine. They should prioritise very local movement, particularly by pedestrians and cyclists and should contribute to informal play provision.

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Figure 4.2: The existing street hierarchy in and around the OA

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**Key Principle UF4:**

Where appropriate, extend existing streets into and through the OA.

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4.22 There are a number of existing streets that could be extended into and through the OA as part of comprehensive regeneration including:

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- Archel Road;
- Chesson Road;
- Baron's Court Road;
- Merrington Road;
- Halford Road;
- Hildyard Road;
- Beaumont Crescent;
- Beaumont Avenue; and
- Star Road.

4.23 If these existing streets are extended, care should be taken to respect existing dimensions, building heights and enclosure ratios.

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4.24 The direct extension of Star Road into the OA is considered particularly important as it has the greatest potential to connect the new neighbourhood to the wider context in the west. This connection must therefore be delivered and it must be delivered in the earliest phase possible.

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4.25 Extending the urban grain should exploit all opportunities to strengthen connections between the OA and Fulham Town Centre, ensuring that activity levels are focused on North End Road and do not take footfall away from existing shops and businesses.

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**Key Principle UF5:**

Extend the existing pattern of garden squares found around the OA into the new neighbourhood and use their most successful features as design precedent for new publicly accessible green open spaces.

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4.26 New garden squares in the OA should take the existing squares in the surrounding area as their design precedents. Design features may therefore include: active streets (accommodating vehicles, pedestrians and cyclists) defining all four edges of the garden squares;

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- garden squares framed by predominantly residential buildings;
- visually permeable boundary treatments (such as hedges or railings) used to ensure garden squares offer visual amenity to the surrounding streets;
- a grand sense of scale created by substantial mature trees; and
- the inclusion of games courts, like the tennis courts at Queens Club Gardens.

4.27 Contemporary garden squares that adopt the most positive characteristics of the traditional garden squares, but also meet 21st Century demands are encouraged.

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In order to meet contemporary demands, new publicly accessible green open spaces should differ from existing garden squares in the following ways:

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- they should be publicly accessible to everyone;
- there should be no private rear gardens backing onto publicly accessible spaces;
- they may spill out into shared surface streets around their edges in order to become a more active part of the public realm; and
- mature trees are encouraged, and could be used to create shade, but they should not leave open spaces dark and/or overshadowed.

Figure 4.3: Aerial photograph highlighting existing garden squares in the OA's immediate surroundings

**Key Principle UF6:**

Retain and/or improve views of special existing local landmarks.

4.28 There are three views of special local landmarks (St. Andrew's Church St. Cuthbert's Church and St. Luke's Church) that the authorities are keen to retain and improve (see Figure 4.4). This will both aid legibility and knit the new development into its existing context. The heights of the buildings that frame the views of these landmarks should not undermine their status as wayfinding markers.

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Figure 4.4: Illustrative diagram of the views of the special existing landmarks that the authorities have identified

**Key Principle UF7:**

Create new view compositions in the OA that complement those identified in the surrounding area and aid navigation and way finding.

4.29 The Character Area Analysis [SPD Supporting Evidence document](#) identifies a number of successful view compositions and landmark buildings that create distinct places and assist with wayfinding. This includes a number of well enclosed long views (see Figure 4.5) and a number of views deflected off corner buildings (see Figure 4.6). Creating new view compositions like these within the OA will not only help to integrate the new development into its surroundings, it will also help people to find their way around, as well as adding to the visual interest.

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Figure 4.5: An example of a well enclosed long view, looking down Redcliffe Gardens to a 'view terminating' building

Figure 4.6: An example of a deflected view, looking down the gently curving Hogarth Road to the corner building on Knaresborough Place

#### Key Principle UF8:

Introduce a deck structure over the railway lines in order to enable an acceptable number of east-west connections to be made. If this proves not to be viable, a series of bridges over the railway lines could be acceptable.

4.30 Achieving the authorities' connectivity aspirations will require either decking or bridging over the West London Line and the District [Line](#) of the London Underground.

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4.31 Bridging over the railway lines in a number of discrete locations would result in the majority of the railway lines remaining exposed. This could result in intrusive noise levels in the new development.

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4.332 Alternatively, east-west connectivity could be achieved by introducing more extensive decking over the entire railway. The deck could be used for either buildings or for the creation of open space. Either way, its long term structural integrity must be guaranteed. Any open space created on top of the deck must exploit the opportunity to create new, direct north-south connections.

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4.33 [Whether the top of a deck is used for open space or buildings](#), it must not compromise connectivity. [Any open space should be permeable](#), and there should be new routes created around and across it that are accessible for all road users. [The creation of 'dead ends'](#) should be avoided.

4.34 At present, the land adjacent to the railway line carries significant biodiversity value. If it is decked over, this must be replaced and enhanced through an open

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space strategy. Please refer to the Environmental Strategy (Chapter 12) for further detail.

4.35 Whether the railway line is decked over or bridged over, tangible links with the past could be created by tracing its alignment (which is also the alignment of the now culverted Counters Creek) and leaving parts of the railway line exposed.

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Figure 4.7: The railway line, looking south from EC2

Figure 4.8: The railway line at the West Kensington platforms

**Key Principle UF9:**

Increase pedestrian connectivity from the A4 into the OA.

4.36 At present, the A4 has a very hostile pedestrian environment. As part of comprehensive regeneration, this should be improved with high quality planting and landscaping and other streetscape improvements. The new buildings that front onto the A4 should not create an oppressive 'mono-elevation'.

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4.37 Only one vehicular connection from the OA to the A4 is expected. However, this should be complemented by additional pedestrian routes from the footway along the southern edge of the A4 into the OA in order to increase visual as well as physical permeability. Such routes must be well overlooked and should include entrances to buildings.

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Figure 4.9: Poor quality public realm on the A4 edge of the OA

## Public Open Space

Figure 4.10: Illustrative diagram showing the potential distribution of open space throughout the OA  
**[KEY AMMENDED]**

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### Key Objective

Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities.

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4.38 As set out in the Site Context Chapter, much of the OA and its surroundings are deficient in publicly accessible open space. There is also limited access to play facilities. Although Brompton Cemetery is large, it does not contribute sufficiently to formal recreation provision to combat the open space deficiency. Of all the surrounding garden squares, only Redcliffe Square is publicly accessible.

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4.39 There are a number of Sites of Nature Conservation Importance (SNCI) in the OA. Please see Figure 4.11.

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Figure 4.11: Existing Sites of Nature Conservation Importance in the OA

### Key Principle UF10:

High quality civic spaces should be well integrated into the proposed urban grain especially in those locations that are expected to have high levels of movement and activity and where appropriate ground floor land uses are proposed.

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4.40 The opportunity to improve the public realm outside each of the existing underground stations and to provide welcoming civic spaces at the 'gateways' into the OA should be explored. The Culture Strategy (Chapter 8) also requires civic spaces to be provided in relation to the new cultural destination.

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4.41 Retail, cafe, culture and community uses should be located on the ground floor around civic spaces to provide them with life and activity.

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4.42 As set out in the transport chapter, civic spaces outside underground stations will be expected to enhance the potential for transport interchange.

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4.43 Of particular significance is the potential for a new pedestrian focused civic space outside Earl's Court Station, as established in RBKC's core strategy. This

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"open urban square" will need to accommodate the significant changes in level that occur in this location whilst maintaining a comfortable gradient for pedestrians. Introducing a welcoming sense of arrival and vibrant, lively public functions in this location could contribute to the continuation of the 'Earl's Court Brand'.

**Key Principle UF11:**

New public open spaces within the OA will be expected to provide for a mix of different leisure pursuits including sports pitches, children's play, court games, passive recreation, community gardening and nature conservation.

4.44 Open space is an important community resource, which creates opportunities for leisure, recreation, play, ecology, natural drainage and improves visual aesthetics. It is key to many issues such as health and biodiversity. The provision of playing pitches, courts and play spaces will help to combat obesity, particularly in children. Some of the open space should also consist of space for community gardening in line with Policy 7.22 of the Mayor's London Plan (2011).

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4.45 Management arrangements will be secured to enable public open spaces to be used at all reasonable times by all members of the public.

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4.46 The open spaces within the OA will also be expected to meet the requirements established in the Environment Strategy in relation to nature conservation, biodiversity, and Sustainable Urban Drainage Systems (SUDS).

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Ecological spaces should be provided in addition to the publicly accessible green open space and recreation quotas set out in this SPD.

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**Key Principle UF12:**

Any proposal for comprehensive regeneration will be expected to include a publicly accessible local park of at least 2 hectares, either as one discrete park or as a series of contiguous smaller spaces that meet the criteria set out in Table 7.2 of the Mayor's London Plan (2011).

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4.47 Existing green spaces surrounding the OA tend to be small and well integrated into the very permeable urban grain. A wholly contained and undissected two hectare open space would not necessarily complement this. Therefore, proposals for a series of contiguous publicly accessible green open spaces that combine to make the offer of linear 2ha local park are encouraged. There are many advantages to this 'linear park' approach including the potential to:

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- improve north-south connectivity for pedestrians and cyclists;

- maximise doorstep access to open space and the aesthetic benefits that parks afford;
- accommodate a diverse range of recreational activities;
- ensure that permeability is not compromised, even if the open spaces are locked at night;
- communicate the historical legacy of the OA by tracing the course of the culverted Counters Creek; and
- ensure that development provides diverse publicly accessible green open space in every phase.

4.48. Furthermore, a linear park approach has considerable potential ecological benefits. Although decking over the railway line may involve the loss of a SNCI, this loss can be mitigated if that deck is used to create a continuous biodiversity habitat. As such, a linear park on the deck over the railway would address Policy CE4 of RBKC's Core Strategy (2010) which states that the council will "require that development proposals create opportunities to extend or link Green Corridors".

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4.49. The land area of SNCI lost by any decking should be reprovided in addition to the 2ha recreational open space.

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4.50. Any proposal for a 'linear park' must include publicly accessible green open spaces that are wide enough to accommodate a range of functions, including full size games courts and sports pitches. It is therefore possible that if a proposal comes forward including a linear park, land take greater than 2ha will be required in order to ensure the park is fully functional.

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4.51. Locating publicly accessible open spaces next to uncovered railway lines may result in unacceptable noise levels and risks to personal safety and should therefore be avoided.

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**Key Principle UF13:**

As far as possible, all residential properties should be within 100m walking distance of a publicly accessible green open space.

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**Key Principle UF14:**

Any regeneration proposal should provide a minimum of 10m<sup>2</sup> of publicly accessible green open space per child.

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**Key Principle UF15:**

Any regeneration proposal should provide a minimum of 10m<sup>2</sup> of dedicated play space per child.

4.52 There is no guidance at either regional or local level that sets out what overall quantity of public open space should be provided by a development of this size. The Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008) sets out standards for access to play. Standard B.2 within this SPG states that "a minimum of 10sqm of dedicated playspace per child (existing and new provision) is recommended as a basis for assessing existing and future provision". It is considered that this provides a useful aggregation for the calculation of the overall quantity of public open space provision. Children under the age of five from houses with private gardens must not be discounted when assessing the publicly accessible green open space required by Key Principle UF14.

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4.53 Any quantum of publicly accessible green open space that is required over and above the 2ha local park should be provided in the form of garden squares that observe the design criteria set out under Key Principle UF5.

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4.54 Key Principle UF15 is also based on the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008). Children under the age of five from houses with private gardens may be discounted when assessing dedicated play space requirements.

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4.55 LBHF and RBKC are both densely developed and highly urbanised. In areas such as this, it is essential that redevelopment opportunities incorporate the provision of safe, stimulating play facilities.

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Figure 4.12: Community gardening at Normand Park

**Key Principle UF16:**

Development in the OA will be expected to provide play facilities for all ages to address the local deficiency. Both naturalistic and equipped play will be expected, and provision for differing age groups should be co-located where appropriate in order to make supervision more practical for families. The authorities will secure the provision of equipped play that meets the location standards set out in Table 4.1 and that is of a size that adequately caters for children within its catchment.

4.56 Given the current deficiency in play provision, the scale of development proposed in the OA and the likely uplift in numbers of young people, play space must

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be provided on-site to meet the needs of all ages. Therefore, a Play Strategy must be submitted with any application for the OA and any subsequent detailed applications must show the location of play areas and how these address the deficiency. Any proposals for open space and/or play space must consider the needs of disabled children and children with other special needs.

4.57. All 'pocket parks' (small areas of open space distributed throughout the public realm) should provide play space for under 5s. Some of the larger open spaces should provide play spaces for 5-11s and the 2 ha local park should provide play facilities for all ages including 12+. The maximum distance that each of these age groups should be expected to walk to access a play space are set out in Table 4.1.

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Table 4.1: The standards for play set out in The Mayor of London's SPG on Providing for Children and Young People's Play and Informal Recreation (2008)

**Key Principle UF17:**

A phasing strategy that demonstrates how all of the publicly accessible green open space requirements will be met must be submitted with any application. It is expected that it will be delivered incrementally so that each phase has proportionate publicly accessible green open space to accommodate the increasing living and working populations.

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**Key Principle UF18:**

All open spaces should be built to and managed to Green Flag Award standards.

4.58. The Green Flag Award scheme provides benchmark national standard for parks and green spaces in the UK.

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## Skyline

### Key Objective

Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape.

4.59 Development within the OA will create a new skyline that should enhance the existing context.

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4.60 At present, there are several buildings in the OA which are significantly taller than those in the surrounding area and therefore have an impact on the skyline (see Figure 4.13). For example, the exhibition centres are large footprint, large span buildings with dominant roofscapes rising to a considerable height when compared with the surrounding context. However, as redevelopment will be residential led, it will introduce very different building typologies. Therefore, the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals. The location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape.

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Figure 4.13: Heights of the tallest existing buildings in the OA. \* Heights are expressed in meters Above Ordnance Datum (AOD). The Ordnance Datum is a set level above which all heights are measured. This means that the significant topographical changes across the OA do not effect the measurements.

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### Key Principle UF19:

Preserve or enhance the character, appearance and setting of surrounding conservation areas and listed buildings.

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4.61 Buildings that are visible on the skyline can be harmful for listed buildings and their settings, conservation areas, historic parks and significant views. Development proposals, including those containing tall buildings, must respect the character and appearance of their surroundings.

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### Key Principle UF20:

Preserve or enhance the character and appearance and setting of Brompton Cemetery and its listed buildings.

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4.62 Brompton Cemetery is a conservation area, the setting of listed buildings and monuments (which are listed in English Heritage's List of Buildings of Special Architectural or Historic Interest), a registered 'park and garden' of special historic interest (Grade I listed) (as described in English Heritage's Register of

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Parks and Gardens: Cemeteries and Metropolitan Open Land. The views from Brompton Cemetery are panoramic and open and as a result, even new buildings of only moderate height may be visible. Therefore, any applications for redevelopment will be expected to preserve or enhance the inherent characteristics of the cemetery setting whilst also improving the enclosure on the western boundary.

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4.63. The opportunity to improve the enclosure of the cemetery is highlighted in RBKC's Conservation Area Proposals Statement which states that "Formal set-pieces such as the neat and open war graves section contrast with less well defined locations such as the flanked Chelsea Pensioners monument and with recent internments. These latter areas fail to provide sufficient enclosure where it is most needed on the western boundary". Therefore, proposals on the eastern edge of the Seagrave Road site should introduce new buildings that enclose, but do not over dominate, the western edge of the cemetery and as a result, enhance the character of the conservation area.

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4.64. Financial contributions will be sought for enhancements to Brompton Cemetery where directly relevant and in scale and kind to any development proposals.

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Figure 4.14: One of the views from Brompton Cemetery tested in the Townscape and Visual Analysis supporting evidence document

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Figure 4.15: One of the views from Brompton Cemetery tested in the Townscape and Visual Analysis supporting evidence document

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### Key Principle UF21:

All proposals will be expected to demonstrate that they do not have a negative impact on the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Therefore all applications must be accompanied by a set of verified views from the points identified in that document and a thorough analysis of the impact that proposals will have on them.

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Where a scheme has a specific impact, not already covered by the Townscape and Visual Analysis SPD Supporting Evidence Document, further verified views will be sought.

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4.65. As set out in the Townscape Townscape and Visual Analysis SPD Supporting Evidence Document, there are a limited number of exceptional views within the OA's

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surroundings from which it will not be appropriate for any new building to be visible on the skyline. However, for the majority of the views, the authorities may accept some new visible buildings if acceptable urban design justification is provided. This justification should address how the alignment, spacing, height, bulk, silhouette, massing and design quality of proposals will be combined to enhance the skyline.

**Key Principle UF22:**

Where tall buildings are visible on the skyline they should enhance legibility by marking the presence of a significant, London-wide public function/destination.

4.66 The Empress State Building is visible on the skyline in a significant number of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. It therefore has the potential to work as a successful landmark, signifying the location of the redevelopment within the OA. In light of this, it may be appropriate to locate a new public destination at the base of the Empress State Building to give meaning to its height and presence on the skyline. This relates to the requirement set out in the Culture Strategy (Chapter 8) to create a new significant cultural destination.

Figures 4.16 to 4.18: Examples of the current impact of the Empress State building on important views towards the OA

**Key Principle UF23:**

All buildings that are significantly taller than their surroundings will be expected to address the following four design aspirations:

1. slenderness;
2. how the building meets the sky;
3. how the building meets the ground; and
4. articulation of the facade.

**Key Principle UF24:**

In any proposal that retains the Empress State Building it should be integrated into an attractive composition of new tall buildings that form a cluster around it.

4.67 Tall buildings should be designed to appear slender and their massing should be proportionate to their height. Large slab blocks with continuous flat tops are discouraged. One way of achieving a slender appearance is to reduce the massing or floorplates of tall buildings as they rise. However, this is not always a guarantee of success.

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**Key Principle UF23:** ¶  
Where tall buildings are visible on the skyline they should enhance legibility by marking the presence of a significant, London-wide public function/destination. ¶

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**Deleted:** . Furthermore, three dimensional analysis of the Development Capacity Scenarios reveals that the most appropriate location for additional tall buildings within the OA is within the vicinity of the Empress State Building.

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locate new buildings of increasing heights close to the Empress State Building in response to its existing status; and¶  
create an inviting composition of taller buildings around the Empress State Building.

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4.67 The first of these bullets contributes to the aspiration set out in the Culture Strategy (Chapter 8) to create a new significant cultural destination within the vicinity of the Empress State Building. The latter recognises that, through variations in height, silhouette, profile and orientation, new buildings within the vicinity of the Empress State Building have the potential to enhance its visual impact on the skyline. All taller buildings within a composition around the Empress State Building should have slender profiles to reduce their visual impact and to allow glimpses of sky between them. ¶

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**Deleted:** The massing of tall buildings should diminish as they get taller. ¶

4.68 The ways in which tall buildings meet the sky will be of particular importance when considering their impact on the skyline. A distinctive and well designed 'top' can help to give identity to a tall building and therefore avoid anonymity. However, when a tall building is part of a cluster, it is the grouping of the buildings and the way in which they read together, that will be the primary source of local distinctiveness. Therefore, for a cluster of tall buildings, attention should be paid to the profile of the top of each building within the context of the whole cluster.

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4.69 Clusters of tall buildings can be attractive as they can provide context for one another. If a number of tall buildings are proposed, a cluster is preferable to an approach that sees them scattered across the OA with no relation to one another. However, a cluster will only be visually attractive if the tall buildings are designed as a whole composition. Their location relative to one another is therefore as crucial to their potential success as the design of the individual buildings themselves. Whilst the lower levels of the individual taller buildings that form a cluster may be largely solid, it is important that their upper levels are variable, with plenty of sky visible between them. This will avoid a visual merging of the cluster into a 'solid wall' of several buildings each of similar form and height.

4.70 The three dimensional analysis undertaken as part of the Development Capacity Scenarios testing exercise revealed that the most appropriate location for additional tall buildings in the OA is within the vicinity of the Empress State Building. It also showed the potential for new buildings within the vicinity of the Empress State Building to enhance its visual impact on the skyline through variations in height, silhouette, profile and orientation.

4.71 The ways in which tall buildings meet the ground is also an important design consideration. If a tall building is treated as a 'stand alone' building it can present difficulties in achieving active frontages on all sides at ground level. This can be avoided by integrating tall buildings into a street, either with the lower storeys forming part of the street 'terrace' or with the lower levels forming a podium from which the tall element rises. Integrating tall buildings into a street gives the potential for the roof areas of the lower storeys to be used as roof terraces for the tall building's users. Given the emphasis in this SPD on the extension of the existing urban grain, this street based approach is likely to be the most successful for any redevelopment of the OA.

4.72 However, whichever approach is taken tall buildings must appear 'well rooted' and their design must mediate between the large scale of the building itself, and the

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human scale of the public realm to which it relates. Active ground floor uses are essential. Tall buildings can also impact on the microclimate at street level. Their location and design must successfully mitigate for these effects.

4.73 The visual impact of tall buildings cannot be assessed in terms of bulk and massing alone. They must also be of excellent architectural quality. The facades of tall buildings need to be particularly carefully articulated and animated. This can be achieved through the use of materials, colour, fenestration, reflectiveness and/or the expression of depth. Blank walls must be avoided. The authorities must be satisfied that any outline planning application for the OA that includes tall buildings as important elements within a robust and credible masterplan also puts in place parameters and design principles that will result in excellent urban design and architecture. In order to ensure that the commitment to high quality can be realised through proactive control of reserved matters, the authorities will make these parameters and design principles a condition of any outline consent.

**Key Principle UF25:**

Proposals for tall buildings should indicate how their impact on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunications interference will be mitigated.

4.74 All applications will be expected to include analysis of daylight, sunlight and the overshadowing of surrounding open spaces and should demonstrate that they do not have a detrimental effect.

**Deleted:** Where appropriate, the tops of tall buildings should be distinctive in order to meet the wayfinding requirements set out under Key Principle UF23. ¶

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4.70 The approach taken to the design of the ways in which tall buildings meet the ground offers the opportunity to ensure that they appear 'well rooted'. Not only will a base with a solid appearance help to achieve this, it will also help to emphasise the desired reduction in massing as the building gets taller. The bases of tall buildings also have the potential to ensure that a successful 'sense of human scale' is achieved. They must have active frontages. ¶

¶  
4.71 When considering the impact of tall buildings on the skyline, their bases will be considered particularly important in terms of local streetscape and near views. ¶

¶  
4.72 The lower storeys of a tall building may: ¶  
<#>be architecturally articulated in different ways to the rest of the building; and/or¶  
<#>be permeable at street level; and/or¶  
<#>use canopies and/or podiums.¶

¶  
4.73 Where they are proposed in the OA, podiums should: ¶  
<#>reduce the impact of tall buildings on the public realm and ensure that they have a human scale;¶  
<#>provide active frontages onto the public realm;¶  
<#>accommodate a varied mix of uses;¶  
<#>explore the opportunity to create accessible amenity on the roof of the podium; and¶  
<#>help to mitigate any microclimate effects created by the tall buildings.¶

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## Edges

Figure 4.19: Illustrative diagram showing proposals for development on the edges of the OA

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### Key Objective

Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context.

4.75 Development around the edges of the OA will be expected to respond to a number of existing conditions including:

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- the heights of adjacent buildings;
- the existing terraces and mansion blocks that need to be brought into new urban blocks;
- the widths of existing streets;
- the existing private rear gardens;
- the proximity to conservation areas; and
- the proximity to listed buildings or heritage assets.

### Key Principle UF26:

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.

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4.76 In the southern part of the OA, the edge conditions along Seagrave Road and the openness of views from the Brompton Cemetery are major influences on acceptable building heights and massing. Currently, this part of Seagrave Road largely comprises of 3 storey buildings rising slightly to a maximum of 5 storeys at the northern end. On the RBKC side of the railway line there is a 5.5 storey building.

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Figure 4.20: The existing built edge fronting onto the Seagrave Road car park

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4.77 There is a strong context to the west of the OA, to which development will be expected to respond. This is created by North End Road and the streets adjoining it. Building heights and typologies in these streets tend to be consistent. Many of these streets are also within conservation areas.

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4.78 On the eastern edge of the OA the terraces of Philbeach Gardens and Eardley Crescent exhibit consistent scale and building typologies which are characteristic of much of the area further east. However, there are also a number of mansion blocks of a larger scale which front Warwick Road. The majority of the buildings to the east of the OA are included within conservation areas.

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Figure 4.21: The existing edge conditions along North End Road

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4.79 Given the strongly defined character that exists to both the western and eastern edges of the OA, any proposed buildings in these locations should not rise significantly higher than the prevailing adjoining heights. Furthermore, in order to help the proposed buildings successfully integrate into their surroundings, they should also reflect the characteristics of nearby streets and buildings.

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Figure 4.22: The scale and building typologies of Philbeach Gardens

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4.80 In the north of the OA, development will be expected to create a 'Metropolitan Face' which responds to the strategic importance of the A4 as a route into and out of Central London. The built form of the Metropolitan Face should create a strong edge to the A4. This may require some relatively tall elements, including potential 'gateway' landmark building(s) at the main entrance to the OA. However, the elevation onto the A4 should not become an oppressive 'mono-facade'. Instead, it must preserve or enhance the setting of the Baron's Court Conservation Area and respond to local topography and character. Gaps between buildings and profiled facades should be used in order to avoid the creation of a wall of monolithic development.

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Figure 4.23: The edge that the OA presents to the important metropolitan corridor of the A4

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**Key Principle UF27:**

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.

4.81 The treatment of the Empress State Building and any new buildings within its vicinity will be particularly important in terms of their impact on the setting of the terrace of listed houses on Lillie Road. The height and massing of any proposed buildings in this area must take account of the impact they will have on near views as well as their relationship with the attractive composition required in Key Principle UF24.

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4.82 Existing building lines create a setting for the public realm, particularly for listed buildings and conservation areas and should therefore be respected. This is

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particularly important for the terrace of listed buildings on Lillie Road, which could be harmed by new buildings that do not follow the same building line.

**Key Principle UF28:**

The privacy, daylight and sunlight of all existing and future buildings must be respected.

4.83 LBHF's UDP Standard S13 (as amended in 2007 and 2011), Protection of Existing Residential Amenities, addresses potential loss of outlook, loss of privacy, noise and disturbance from roof terraces and balconies and aspect. Any application for regeneration within the OA must demonstrate that full regard has been paid to these standards.

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4.84 RBKC's Core Strategy (2010) also identifies the importance of residential amenity and Policy CL5 requires all new buildings to ensure that "the conditions of existing adjoining buildings and amenity spaces are not significantly reduced". It also requires "reasonable visual privacy for occupants of nearby buildings" and "that there is no harmful increase in the sense of enclosure to existing buildings".

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**Key Principle UF29:**

Sensitively incorporate the existing buildings that remain on the edges of the OA into new urban blocks.

4.85 Existing properties on the edges of the OA and their relationship with any new development should be treated sensitively. Where the back gardens of existing buildings occur on the boundary of the OA, they should be incorporated into new urban blocks. Any proposals for the OA should demonstrate due regard for the access requirements and boundary locations of existing private rear gardens. Either new 'back-to-back' private gardens or semi private communal gardens, which are only accessed by the residents of the new adjoining properties, should be introduced between the new and existing buildings.

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Figure 4.24: Illustrative approach to sensitively incorporating the Lillie Road terrace (made up of listed buildings and buildings of merit) into a new urban block

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**Key Principle UF30:**

Development within the OA should not prejudice future development of other sites outside its boundary.



## Streets

### Key Objective

Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

4.86 There are a number of different streets in the OA's surroundings. Although there are differences between them, which make different neighbourhoods identifiable, there are also a number of similarities. In order to integrate the OA into its surrounding context successfully, the design of new streets should also adopt these common features.

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### Key Principle UF31:

The widths of the streets should be proportional to the heights of the buildings that frame them. In general, no street should have an 'enclosure ratio' narrower than 1:1. In other words, no buildings should be taller than the width of the street onto which they front.

4.87 In order to design a successful street, it is important that the heights of buildings are proportional to the width of the streets onto which they front. This relationship is known as the 'enclosure ratio', which is usually expressed as:

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'building height : street width'.

4.88 Successful enclosure depends upon the type of street being designed. For example, some Secondary Streets should have generous proportions whilst, in general, all Tertiary Streets should feel more intimate. The following enclosure ratios were found in the OA's surroundings:

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- Primary Streets have the most generous proportions, tending to range between 1:1.25 and 1.5.4 (the street is wider than the buildings are tall);
- Secondary Streets tend to range between 1:1.2 and 1:3.2 (the street is slightly wider than the buildings are tall); and
- Tertiary Streets have the most intimate proportions, tending to range between 1:0.8 and 1:1.9 (the street width and buildings heights are roughly the same).

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4.89 As a general rule across the OA, it is considered that any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area and would risk feeling oppressive or 'canyon-like' and/or having restricted daylight/sunlight.

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Therefore, any street that breaks this rule will require significant urban design justification.

4.90 In order to achieve appropriate enclosure ratios, 'shoulder heights' may be used. The shoulder height of a building is the line above which the top storeys are set back, thus reducing their visible impact at street level. A general limit of one storey above shoulder height will be expected across the OA. Any further storeys above shoulder height will need to be justified in relation to street proportions and design. Plant should be included within the overall design of buildings and not simply added to rooftops.

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**Key Principle UF32:**

The heights of buildings and the widths of streets will be expected to vary according to street type.

4.91 In the OA's surroundings, the Character Area Analysis showed that street widths (building front to building front) tend to fall into the following broad range:

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- Primary Streets: from 16m to 60m (the majority fall between 16m and 27m);
- Secondary Streets: from 15m to 24m; and
- Tertiary Streets: from 6m to 18m (the majority fall between 6m and 9m).

4.92 As the cross sections in Figures 4.25 to 4.27 demonstrate, achieving enclosure ratios no narrower than 1:1 need not result in monotonous streets if the heights of the buildings and the widths of the streets vary in response to street type. Streets that are likely to accommodate high levels of movement and activity should be wide, with higher buildings, whilst local streets should be narrower with lower buildings.

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4.93 Buildings along a whole street, or on either side of the street, do not have to have exactly a same height. A level of variation is possible within the general 1:1 proportion.

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Figure 4.25: An illustration of a wide street with a mix of uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

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Figure 4.26: An illustration of a medium width street with only residential uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

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Figure 4.27: An illustration of a narrow street with only residential uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

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4.94 The importance of appropriate enclosure ratios is applicable to open spaces as well as streets. As outlined in the Character Area Analysis, the existing garden squares in the OA's surroundings tend to be framed by residential buildings that are broadly between 15m and 26m in height (from street level). Using 21st Century floor to ceiling heights, this equates to roughly 5 to 8.5 residential storeys.

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4.95 The open spaces themselves tend to be between 35m and 65m wide and 50m and 115m long. Their enclosure ratios are generally between 1:3 and 1:7.

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Figures 4.28 and 4.29 show examples of the enclosure ratios found in local garden squares. For more examples and further analysis, please refer to the Character Area Analysis.

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4.96 All open spaces proposed for the OA, not just the garden squares, but also those that make up the offer of a 2ha local park, will be expected to meet similar enclosure ratios. They will also be expected have similar dimensions and any buildings fronting onto them will be expected to be similar in height to those identified in the Character Area Analysis. Any open spaces that differ significantly from those found in the surrounding area in terms of spatial dimensions, the heights of surrounding buildings and/or enclosure ratios will require full urban design justification.

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Figure 4.28: Queens Club Gardens enclosure ratio. For more local examples, please refer to the Character Area Analysis

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Figure 4.29: Redcliffe Square enclosure ratio. For more local examples, please refer to the Character Area Analysis

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#### Key Principle UF33:

The buildings that frame the streets and open spaces within the OA should create strong, consistent building lines with boundary treatments that are appropriate to the use found within them.

4.97 The streets in the OA's surroundings tend to have strong and consistent building lines. They should be replicated within the OA.

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4.98 For residential buildings, strong building lines should be created on the back edge of footways by formal boundary treatments surrounding small front gardens or 'residential threshold spaces' (see Figure 4.31). This would ensure that residential buildings have sufficient privacy.

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4.99 Non residential buildings, including shops and offices, should also have strong building lines but need not have threshold spaces. Instead, the building lines could be created by the frontages of the buildings themselves. This would give the shops and businesses a strong street presence and would create the opportunity for appropriate non- residential uses to spill directly into the public realm, provided they do not obstruct pedestrian movement.

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4.100 Building lines may vary to a degree between terraces or between urban blocks. Any proposals that include variations other than this will be expected to include a full urban design justification.

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Figure 4.30: Consistent building line created by residential threshold spaces

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Figure 4.31: Consistent building line created by building frontages

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**Key Principle UF34:**

Arbitrary variations in roofscapes should be avoided. Instead, rooflines should be strong and should demonstrate regular rhythms.

**Key Principle UF35:**

Building blocks that are both long and high are not appropriate. Bulk and scale should be broken down by the grid of streets and other articulation.

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4.101 The roofscape of an urban environment is the pattern created by the articulation of the rooftops. The Character Area Analysis identified that the roofscapes of the Victorian and Edwardian building typologies surrounding the OA are generally consistent. In some cases this means that they are simple, with very little visible articulation above the parapet lines (see Figure 4.32), in other cases they are punctuated by a regular rhythm of architectural details like dormer windows (see Figure 4.33 overleaf). These sorts of patterns should be replicated and reinterpreted within the OA.

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Figure 4.32: Simple roofscape with a strong parapet

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Figure 4.33: Consistent roofscape with regular rhythm of dormer windows

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4.102 Variation in mid terrace should be part of an overall composition and should not be arbitrary. Variations could occur between urban blocks or across streets. Roofscape across the OA should not be monotonous. Instead, they should vary according to land use or street type.

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4.103 Where other occasional, subtle variations do occur they should signify important public functions or punctuate important parts of the urban grain like key nodes and corners.

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4.104 Consistency in roofscapes should be applied to shoulder heights as well as rooftops. Wherever possible, plant should be integrated into the design of the main building rather than located conspicuously on rooftops.

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4.105 Wherever appropriate, any accessible roof spaces should be used as terraces or roof gardens that contribute to amenity space and ecology. Any appropriate roof spaces that are not accessible should be treated as green or brown roofs.

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**Key Principle UF36:**

All proposals for regeneration within the OA will be expected to demonstrate a comprehensive, holistic approach to street design that treats streets as places where people will want to spend their time and that encourages cyclists and pedestrians.

4.106 Any application for the OA will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, 'An Inclusive Environment'.

4.107 All reserved matters applications will be expected to include a streetscape strategy.

4.108 Streets should not just be routes for movement, but should also be places where people want to dwell. As a result, good, unified street design that avoids all unnecessary street clutter is crucial.

4.109 The design of some streets should include regular rhythms of street trees. Street trees play an important role in the perception of a pleasant pedestrian experience. They contribute to street enclosure, reduce the visual impact of taller buildings and parked cars, provide shade and shelter and demarcate the footway. Street trees could also help to integrate the new neighbourhood into its existing context. All tree species selected for the new streets within the OA should be demonstrably similar to those found in the existing context.

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4.110 All street trees will be expected to allow sufficient headroom for pedestrians and cyclists, avoid 'cluttering' the unobstructed pedestrian zone and ensure that visibility for street users is not compromised.

4.111 In order to encourage walking:

- ensure that all footways include an unobstructed zone reserved for pedestrian movement;
- avoid extensive pedestrianisation as the activity generated by other road users contributes to the enjoyment and safety of pedestrians; and
- ensure that no footway is has a gradient steeper than a 1:20 or 1:12 over short distances in extreme circumstances (as set out in 'Inclusive Mobility' (2005)).

4.112 In order to create cycle friendly streets that encourage cycling:

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- ensure that there is direct cycle access to a suitable location near the entrance of all buildings, via clear and legible routes;
- sign routes to the most important locations;
- provide ample cycle parking that is convenient, easily accessible, covered, secure and attractive;
- incorporate safe cycle priority at busy traffic junctions; and
- use attractive, modern design solutions in order to raise the profile of cycling as a mode of transport.

**Key Principle UF37:**

Streets should be designed to keep vehicle speeds under 20mph.

4.113 Instead of introducing visually intrusive traffic calming measures, such as speed humps or chicanes that do not reflect the character of the surrounding streets, new streets should be designed from the outset to control vehicle speeds. Design features that naturally reduce vehicle speeds include:

- narrow carriageway widths;
- on-street parking;
- accommodating cyclists in the carriageway rather than in dedicated cycle lanes; and
- introducing changes in surface materials.

**Key Principle UF38:**

Ensure that all streets and public open spaces are fronted onto by the public fronts of buildings.

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4.114 Buildings in the OA will be expected to have clearly identified backs and fronts. The backs should be private (for example private rear gardens or servicing areas) and the fronts should be public (for example front doors or shop windows). Urban blocks in the OA should be arranged so that all of the backs are in the centre of the block, facing and protecting each other and all of the fronts should address the public realm. This will ensure that the public realm is well overlooked and animated, whilst offering sufficient privacy for garden spaces or hiding unsightly activities.

**Deleted:** 4.114 · In order to achieve this, all urban blocks within the OA should have clear differentiation between their public fronts and private backs. As in the surrounding context, public fronts should address the public realm whilst private backs should be absorbed into the centre of urban blocks and should be made up of private or communal gardens and service streets.¶

**Key Principle UF39:**

Ensure that all streets and public open spaces are overlooked by the 'active frontages' of buildings, comprising frequent windows and entrances.

4.115 'Active frontages' are defined here as those which contain frequent windows and entrances. Ensuring that public spaces are overlooked by active frontages provides 'natural surveillance' and therefore reduces both the incidence and fear of crime. As shown in Figure 4.34 one efficient way to achieve this principle is to ensure that all ground floor residential units have their own front door onto the street. However, this approach would not be suitable for mansion blocks as this typology should feature grand communal entrances. Where communal entrances are used, they must be accompanied by a high frequency of large windows overlooking the street.

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4.116 Ground floors may be taller in proportion than the upper floors in order to create well proportioned elevations and allow long term flexibility.

Figure 4.34: A development at Mastmaker Road with individual front doors for every ground floor flat.

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Figure 4.35: Mansion blocks at Queens Club Gardens with communal entrances and large, frequent windows overlooking the street.

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## Illustrative Development Parcels

4.117 Comprehensive redevelopment of the OA will need to be approached in phases. Each phase must contribute towards the appropriate Key Objectives and Key Principles from this SPD in order to ensure that the new and growing population can access the appropriate services and infrastructure. The following illustrations show how the Key Objectives and Key Principles could be delivered in different development parcels, and ultimately for the OA as a whole. They should not however, be treated as an illustration of phasing and no application will be assessed against them.

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Figure 4.36: Illustrative diagram showing parcel a (Seagrave Road). For illustrative purposes only.

### 4.118 Development Parcel a (Seagrave Road)

- Parcel a has the potential to extend Merrington Road, Hildyard Road and Halford Road into the OA thus extending urban grain in an east-west grid of streets.
- Parcel a must deliver a publicly accessible green open space (possibly in the form of a garden square) within 100m walk of the majority of the residential units and, as set out in Key Principle UF17, proportionate to the needs of the new living and working populations.

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Figure 4.37: Illustrative diagram showing parcels b and c. For illustrative purposes only.

### 4.119 Development Parcels b and c:

- The design of both parcels b and c must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Both parcels b and c have the potential to deliver new north-south connections into the OA from Lillie Road.
- Parcel b has the opportunity to replicate the crescent street form found in the neighbouring areas.
- Parcel c must deliver east west connectivity across the entire OA from North End Road to Warwick Road during an early phase of development. This may involve creating a connection through the housing estates if they haven't been redeveloped. Contingency plans will be expected to ensure this east-west connectivity is deliverable if comprehensive redevelopment of the OA does not happen.
- As set out in Key Principle UF17, parcels b and c should have proportionate publicly accessible green open space (possibly in the form of a linear park) to accommodate the new living and working populations. This should be distributed

**Deleted: <#>Phase 1 has the potential to extend Merrington Road, Hildyard Road and Halford Road into the OA. ¶**  
**<#>Phase 1 must deliver a publicly accessible garden square within 100m walk of the majority of the residential units. ¶**  
**<#>The design of Phase 2 must include the potential for an orthogonal east-west street grid to be delivered across the OA in later phases. ¶**  
**<#>Phase 2 has the opportunity to replicate the neighbouring crescent street form. ¶**  
**<#>Phase 2b must deliver east west connectivity across the entire OA. This may involve creating a connection through the housing estates. ¶**  
**<#>Both phases 2 and 2b have the potential to deliver new north-south connections into the OA from Lillie Road.¶**  
**<#>Phases 2 and 2b should deliver no less than 0.5 Ha of the contiguous public green open space(s) that could create the offer of a 2ha local park.¶**

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in a manner that ensures the majority of residential units are within a 100m walk from it.

Figure 4.38: Illustrative diagram showing parcels d and e. For illustrative purposes only.

#### 4.120 Development Parcels d and e

- Parcel d must deliver an east-west connection from Star Road into the OA. As outlined under Key Principle UF4, this is considered to be a particularly significant link and its delivery will be expected as early as possible.
- The design of both parcels d and e must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Parcel d should introduce a north-south connection from Lillie Road.
- Parcel d has the potential to extend Archel Road and Chesson Road into the OA, thus extending urban grain in an east-west grid of streets.
- As set out in Key Principle UF17, parcels d and e should have proportionate publicly accessible green open space (possibly in the form of garden squares) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.

Figure 4.39: Illustrative diagram showing parcels f and g. For illustrative purposes only.

#### 4.121 Development Parcels g and h :

- The design of parcels f, g and h must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Parcel f should deliver a vehicular connection to the A4. Construction access from the A4 into the OA is likely to be required during the earliest phases of development.
- Parcel g should deliver a number of pedestrian and cycle connections from the A4 into the OA.
- Parcel g has the potential to extend Baron's Court Road into the OA thus extending urban grain in an east-west grid of streets.
- Parcel h has the potential to extend Beaumont Crescent into the OA.
- As set out in Key Principle UF17, parcels f, g and h should have proportionate publicly accessible green open space (possibly in the form of a linear park or garden squares) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.

**Deleted:** <#>Phase 3 must deliver an east-west connection from Star Road across the OA. As mentioned previously, this is considered to be a particularly significant link and delivery of it will be expected as early as possible.¶

<#>Phase 3 also has the potential for other east-west connections and the potential to introduce a north-south connection from Lillie Road.¶

<#>Phase 3 also has the potential to extend Archel Road and Chesson Road into the OA, thus extending urban grain in an east-west grid of streets.¶

<#>Both phases 3 and 3b must deliver new publicly accessible garden squares in order to ensure that the maximum number of residential units are within 100m walk of an open space.¶

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**Deleted:** <#>Phase 4 should deliver a vehicular connection to the A4. Construction access from the A4 into the OA is likely to be required during earlier phases. ¶

Phase 4b has the potential to deliver a number of pedestrian and cycle connections from the A4 into the OA.¶

Phase 4b has the potential to extend Baron's Court Road into the OA.¶

If a linear park is proposed to deliver the offer of a 2ha local park, it must be completed during phase 4b. ¶

Both phases 4 and 4b have the potential to continue the development of a grid of streets with an east-west emphasis.¶

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## Housing Strategy

### Overview

#### Key Objective

Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

5.1 This chapter sets out the housing requirements in relation to estate regeneration, affordable housing, housing mix, housing size, housing space, amenity space and accessible housing. [Policy and guidance on housing density requirements in the area can be found in London Plan Policy 3.4 and the Mayor's draft Housing SPG 2011.](#)

### Context

5.2 The area surrounding the OA is typically characterised by Victorian terraced housing and mansion blocks, which are generally owner occupied or privately rented. There are also some post-war housing estates located to the east and north of the OA and some modern purpose built residential premises to the north.

5.3 Within the OA, existing housing is primarily located within the West Kensington and Gibbs Green estates. Some of these properties are leasehold or freehold having been purchased under the 'right to buy' initiative. There is also some private residential accommodation located to the south of the OA on Empress Place, Lillie Road and Seagrave Road.

Figure 5.1: Photograph of terraced housing.

Figure 5.2: Photograph of terraced housing.

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Deleted: There is no Key Principle in the Housing Strategy relating to housing density as this is already dealt with by Policy 3.4 in the Mayor's London Plan. The acceptable density of any proposals would be assessed against this policy, which states that taking into account local context and character, the design principles and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2 (of the London Plan). ¶

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## Policy Context

### 5.4 The Mayor's London Plan (2011):

- ['Optimising Housing Potential' \(Policy 3.4\);](#)
- 'Quality and Design of Housing Developments' (Policy 3.5);
- ['Large Residential Developments' \(Policy 3.7\);](#)
- 'Housing Choice' (Policy 3.8);
- 'Mixed and Balanced Communities' (Policy 3.9);
- 'Definition of Affordable Housing' (Policy 3.10);
- 'Affordable Housing Targets' (Policy 3.11);
- 'Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes' (Policy 3.12);
- 'Affordable Housing Thresholds' (Policy 3.13); and
- 'Existing Housing' (Policy 3.14).

### 5.5 LBHF's Core Strategy (2011):

- 'Strategic Policy FRA';
- 'Strategic Site and Housing Regeneration Area 1 – FRA';
- 'Affordability' (Policy H2);
- 'Housing Quality and Density' (Policy H3);
- 'Meeting Housing Needs' (Policy H4); and
- 'Student Accommodation' (Policy H6).

### 5.6 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' (Policy CA7);
- 'Strategic Objective for Diversity of Housing' (CO6);
- 'Housing Targets' (Policy CH1); and
- 'Housing Diversity' (Policy CH2).

Figure 5.3: Photograph of a new housing development at Empire Square, Southwark. Photograph by Ivor Samuels

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## Estate Regeneration

### Key Principle HO1:

The authorities will require a comprehensive approach to the redevelopment of the OA and LBHF will expect comprehensive redevelopment to deliver estate regeneration.

5.7 In 2007, the Government commissioned a study into the 'Future of Social Housing' by Professor John Hills. Many of the findings from this study reflect a national position of residualised social housing with concentrations of deprivation and social problems. Unemployment within the West Kensington and Gibbs Green estates is twice the borough average. Long term unemployment is especially problematic with 40% claiming benefits for longer than 6 months. 12% of the working age population claims Incapacity Benefit compared to a borough average of 6%. Housing Benefits claimants are at around 44% compared to a borough average of 25%. Referrals to both Child and Adult social care are significantly higher than in the rest of the borough. Residents on the estates suffer from a higher standardised mortality rate than the borough average.

5.8 Like many residential estates built in the 1960s and 1970s, the estates also suffer from discontinuous internal roads and poor quality open space which is underused and poorly integrated within the surrounding area. The West Kensington Estate in particular, has large areas of underused communal land that is poorly laid out. This poor layout discourages pedestrian footfall which reduces natural surveillance, which may increase the occurrence and perception of crime.

5.9 Given the development aspirations of adjacent landowners, LBHF have been investigating the potential for the inclusion of the West Kensington and Gibbs Green estates within the wider development proposals. LBHF's Core Strategy (2011), Strategic Site and Housing Regeneration Area – FRA 1 states that "*Regeneration of the West Kensington, Gibbs Green and Registered Provider estates phased over up to 20 years will be considered as part of the comprehensive approach to the opportunity area*". Annex 1 of the Mayor's London Plan identifies that the OA "*presents a significant opportunity for regeneration comprising estate renewal*" and that "*A comprehensive approach should be taken to planning the future of the exhibition complex, the Transport for London Lillie Bridge Road depot, the local authority housing estates and other sites in the vicinity*".

Figure 5.4: Photograph of a street within the West Kensington Estate

Figure 5.5: Photograph of garages within the West Kensington Estate

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5.10 With the future of the West Kensington and Gibbs Green estates in mind, LBHF is undertaking a review (known as the 'Estates Regeneration Economic Appraisal') of the economic benefits and disbenefits of the following four principle options:

- Minimum intervention;
- Minimal intervention and in-fill development;
- Comprehensive redevelopment as a standalone estate redevelopment; and
- Comprehensive redevelopment as part of a wider Earl's Court masterplan development.

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5.11 The initial conclusions are that estate redevelopment as part of a wider Earl's Court masterplan development delivers the optimum benefits. LBHF, as landowner and being responsible for the estates as housing authority, has accepted and endorsed the conclusions contained within the Estates Regeneration Economic Appraisal, subject to the outcome of further consultation with local residents and any required consents from the Secretary of State.

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5.12 One of the supporting evidence documents that accompanies this SPD is a Development Capacity Scenarios study. Scenario 1 in this study looks at a development scenario that does not involve the West Kensington and Gibbs Green estates whereas Scenarios 2 and 3 look at comprehensive redevelopment including the estates. A critique of each scenario is included in the study, which demonstrates that including the estates in comprehensive redevelopment has far greater benefits in terms of extending the urban grain, increasing public open space and improving connectivity.

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5.13 The inclusion of the estates as part of a comprehensive phased redevelopment of the OA would provide opportunities for the re-provision of the existing estate housing as part of a wider mixed tenure development. This would foster the creation of more mixed communities, which is a key tenet of Planning Policy Statement 1 on Delivering Sustainable Development. The utilisation of these adjacent sites also provides better opportunities for getting an improved quality of social rented accommodation.

5.14 In consideration of the above, LBHF, as a planning authority, is of the opinion that any approach to comprehensive redevelopment of the OA should include the West Kensington and Gibbs Green housing estates. Planning obligations will be put in place to ensure the delivery of estate redevelopment as part of any comprehensive approach to development in the OA.

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**Key Principle HO2:**

Any planning application involving the redevelopment of the Gibbs Green and West Kensington housing estates will have to demonstrate that the proposals would not result in any net loss of affordable housing measured by floorspace and unit numbers.

5.15 The Mayor's London Plan (2011) Policy 3.14B states that the loss of housing, including affordable housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. LBHF will also require that there is no net loss in unit numbers, in order to provide comfort to residents who live in a property within the estates, that they will have the opportunity to remain within the OA.

Figure 5.6: Aerial photograph of the Seagrave Road carpark site

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**Key Principle HO3:**

Any planning application providing affordable units in order to facilitate the reprovision of housing for the residents of the West Kensington and Gibbs Green estate, should be accompanied by an assessment of need. This should demonstrate that any affordable housing being provided will be sufficient in terms of size and adaptation to cater for the needs of residents on the existing estates who have expressed a desire to remain in the area.

5.16 Direct 'like for like' reprovision of the social housing in the Gibbs Green and West Kensington estates would not address current issues of overcrowding and hidden households or necessarily meet the housing needs of existing tenants. LBHF will require any regeneration proposals to provide for the housing needs of the estates' existing tenants and to provide sufficient housing options for those existing leaseholders and freeholders who wish to stay to have the opportunity to purchase an equivalent property (in terms of bedroom numbers) to their existing property. The assessment of need must accompany any planning applications submitted to LBHF.

Equality considerations would need to be considered as part of the assessment of need. Separately, any application proposing redevelopment of the estates or re-housing of residents would need to be accompanied by an Equalities Impact Assessment, which would assess the impact of any proposals against 'protected characteristics' as defined in the Equality Act 2010.

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**Key Principle HO4:**

25% of all new housing on the Seagrave Road site should be social rented and include a mix suitable to facilitate the re-provision of housing for an identified proportion of residents of the West Kensington and Gibbs Green estates.

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¶

5.17 LBHF's Core Strategy (2011) Policy on the OA Strategic Site states that "development proposals for Seagrave Road should provide for the opportunity to deliver approximately 25% of all housing as social rented housing, subject to estate regeneration coming forward, detailed analysis and viability".

5.18 Seagrave Road is currently used as a car park for the Earl's Court Exhibition Centres and is considered suitable for an early phase for redevelopment. It is therefore imperative that a certain quantum of the affordable housing provided on the Seagrave Road site is of a mix that reflects the needs of an identified proportion of the residents of the West Kensington and Gibbs Green estates, having regard to the requirements of Key Principle HO3.

5.19 In addition to this, affordable housing will be required to top up to the 40% affordable housing target identified in LBHF's Core Strategy Policy H2, subject to viability.

**Key Principle HO5:**

The Phasing Strategy required in Key Principle PS1 (see Phasing and Section 106 Strategy) should demonstrate that the phasing and re-housing for the redevelopment of the West Kensington and Gibbs Green estates minimises disruption to existing residents.

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5.20 The Phasing strategy should seek to provide certainty and clarity of delivery on a phased basis. The strategy should enable the wider regeneration proposals to commence promptly and continue efficiently, with discreet sections of existing housing capable of being replaced and residents relocated with minimum disruption. As part of any estate regeneration programme, residents should only be expected to move once – from their existing property to a new one.

Figure 5Z: Housing within the West Kensington estate

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## Tenure Mix

5.21 Policy 3.12A of the Mayor's London Plan (2011) states that *"the maximum reasonable amount of affordable housing should be sought"*, having regard to current and future affordable housing requirements, affordable housing targets, the need to encourage rather than restrain development, the need to provide mixed and balanced communities, the size and type of affordable housing needed in particular locations and the specific circumstances of individual sites.

### **Key Principle HO6:**

In LBHF, 40% of all new housing in the OA should be affordable, subject to viability. The priority will be the replacement of the existing social rented accommodation to meet the needs of the existing residents of the two housing estates. The remainder of the affordable housing should be intermediate or affordable rented.

5.22 LBHF's Core Strategy (2011) Policy H2 states that 40% of residential units on sites with the capacity for ten or more self contained dwellings should be affordable, with a preference for *"all additional affordable housing to be intermediate and affordable rented housing unless a small proportion of new social rented housing is necessary in order to enable proposals for the regeneration of council or housing association estates"*, as is the case in the OA.

### **Key Principle HO7:**

In RBKC, 50% of all gross external residential floorspace above 800sqm should be affordable and provided on site within RBKC, subject to viability. A minimum of 15% of the affordable housing provision should be intermediate, with the remainder being social rented housing.

5.23 RBKC's Core Strategy (2010) states at paragraph 10.3.12 *"Earl's Court must retain the diversity of housing tenure which it currently enjoys. Residential development in Earl's Court must deliver a mix of housing to reflect local and boroughwide need."* The delivery of affordable housing forms part of the Vision for Earl's Court at paragraph 10.2, supported by Policy CP10 and CA7(q). Policy CH2i requires *"developments to provide affordable housing at 50% by floor area on residential floorspace in excess of 800sqm gross external area"*. Where less than 50% is provided it must be demonstrated that this is the maximum reasonable amount of affordable housing through an agreed viability assessment. RBKC Core Strategy (2010) Policy CH2k requires *"affordable housing provision of affordable homes on site where more than 1,200m<sup>2</sup> of gross external residential floor space is proposed, unless exceptional circumstances exist"*. There is therefore an expectation that the affordable housing provision will be on-site within RBKC. RBKC Core

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Strategy (2010) Policy CH2q also requires "that affordable housing includes a minimum of 15% intermediate housing in the Earl's Court ward".

5.24 The Government has recently introduced a new affordable housing tenure, known as Affordable Rent. This tenure is different to social rented and intermediate housing. It is not captured in RBKC's Core Strategy (2010) as it was introduced following the adoption of the Core Strategy. RBKC has recently adopted an interim policy for calculating Affordable Rent contributions in RBKC. This interim policy is a material consideration in the determination of planning applications and is available from RBKC Housing Department.

**Deleted:** RBKC are currently preparing an interim policy on Affordable Rent that, if adopted, will be a material consideration in the determination of planning applications.¶

**Key Principle HO8:**

Intermediate housing should provide for a broad range of affordability and tenure types.

5.25 The authorities will expect intermediate products to be targeted at a range of affordabilities, having regard to the requirements of para 3.61 of the Mayor's London Plan (2011), Policy H2 of LBHF's Core Strategy (2011), Policy CO6, Policy CH2r and para 35.3.14 of RBKC's Core Strategy (2010). Any intermediate housing will be expected to cover a variety of intermediate products, including shared equity, key worker, discounted market sale/rent and shared ownership, with a particular focus on products that allow for ownership and access to the property ladder.

**Key Principle HO9:**

To ensure diversity of housing and the delivery of a balanced community, the affordable housing must be tenure blind in terms of the external appearance of the buildings, entrance arrangements and amenity. Any affordable housing should be distributed by building or by block throughout the OA.

5.26 The Mayor's London Plan (2011) Policy 3.5 states that "*Housing developments should be of the highest quality internally, externally and in relation to their context.*" Para 3.76 of the Mayor's London Plan (2011) and para 1.3.13 of the [Mayor's draft Housing SPG \(2011\)](#), state that schemes should be designed so that all affordable housing units have the same external appearance and entrance arrangements as the private housing.

Deleted: Mayor's Housing SPG EiP draft (2010)

5.27 Both LBHF's and RBKC's Core Strategies require affordable housing and market housing to be integrated in any development and to have the same external appearance (RBKC Policy CH2n and LBHF para 9.30). Furthermore, RBKC's Core Strategy (2010) Policy CH2 requires the affordable and market housing to have equivalent amenity in relation to factors including views, daylight, noise and proximity to open space, playspace, community facilities and shops.

**Key Principle HO10:**

The authorities will require that any detailed or reserved matters applications for each phase of the development should include an Affordable Housing Plan, which must set out the affordability, location, tenure mix and unit size of any proposed affordable housing within the phase.

5.28 In order to deliver Key Principle HO9 and ensure that any redevelopment of the OA delivers mixed and diverse communities, the authorities will expect any detailed or reserved matters applicant to submit an Affordable Housing Plan. This would contain details on the affordability, tenure mix, unit size and spread of different housing tenures through each phase of development. The authorities will look to ensure that as much as possible, affordable tenures are integrated with market tenures, as per the requirements of HO9.

**Key Principle HO11:**

The authorities will control the affordability of any affordable housing.

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5.29 The authorities will consider mechanisms to ensure that the affordability of affordable housing costs are not compromised by excessively high service charges or maintenance rates. Housing should be designed to provide for ease of maintenance for low cost home ownership. Providing buildings or blocks of exclusively affordable homes, as outlined in Key Principle HO9, will help to minimise service charges for residents. Further it will assist with tenancy management and internal building management. This also allows for single decants and importantly enables communities to stay together. Applicants will be expected to provide information on the 'weekly cost to occupier' of the proposed affordable units, including realistic and affordable service charges. For intermediate housing, annual housing costs (including service charge) should be no greater than 40% of net household income.

## Housing Sizes

5.30 The Mayor's London Plan (2011) Policy 3.8 states that "Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments". LBHF's Core Strategy (2011) Strategic Objective 2 and Policy H4 place particular emphasis on the need for family sized housing. RBKC's Core Strategy (2010) Policy CH2a requires "new residential developments to include a mix of types, tenures and sizes of homes to reflect the varying needs of the borough, taking into account the characteristics of the site and current evidence in relation to housing need". Paragraph 35.3.10 sets out indicative house sizes (see below) but acknowledges that it would be unrealistic to expect all housing schemes to comprise dwellings built to these exact ratios.

## Social Rented Housing Sizes

### Key Principle HO12:

In LBHF, the social rented housing mix should mirror that identified in the Assessment of Need, produced in accordance with Key Principle HO3. In RBKC, the social rented housing mix should aim for a minimum of 55% 3 and 4 bed with the remainder being 1 and 2 bed.

5.31 In LBHF, the size of the units required to enable the regeneration of existing housing estate properties will be dependent on the assessment of need. This issue is covered in more detail in the preceding section on estate regeneration.

5.32 RBKC has a significant shortage of larger social rented properties. Paragraph 35.3.10 of RBKC's Core Strategy (2010) identifies an ideal mix of 45% 1 and 2 bed and 55% 3 and 4 bed. Development proposals should also consider the needs of extended families.

**Deleted:** Development proposals should also consider the needs of extended families. ¶

## Intermediate Housing Sizes

### Key Principle HO13:

The intermediate housing mix must have regard to the local and strategic housing need assessments and the advice of the boroughs' and GLA's Housing Departments.

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5.33 LBHF's policy for intermediate housing mix is based on the Mayor's Housing Strategy (2010) (Policy 1.1C) which states that "...by 2011, 16% of intermediate homes should have three bedrooms or more". The split between one bed and two bed intermediate properties is not set within the Mayor's Housing Strategy (2010), but LBHF will expect a significant proportion of the intermediate properties to be two bed, which reflects the needs and aspirations of people on the H&F Homebuy register.

5.34 RBKC has a shortage of intermediate homes, but because of land values, the preference is for smaller properties, as larger homes become 'unaffordable' to the intermediate housing market. Paragraph 35.3.10 of RBKC's Core Strategy (2010) identifies an ideal mix as 70% 1 and 2 bed, and 30% 3 and 4 bed. Intermediate products should be offered at the 'usefully affordable' point.

### Market Housing Sizes

#### Key Principle HO14:

Development proposals within the OA will be expected to provide a range of market housing unit sizes, especially the provision of larger family sized units (3 bedrooms or more), having regard to the London Strategic Housing Market Assessment 2008 and both LBHF and RBKC Core Strategies.

5.35 The London Strategic Housing Market Assessment 2008 shows the market housing demand to be 39% 1 bed, 47% 2 bed and 14% 3 bed. Para 35.3.10 of RBKC's Core Strategy (2010) shows the demand for market housing in RBKC over the next 20 years to be 20% 1 and 2 bed units and 80% 3 and 4 bed units. Therefore, on the basis of this evidence, both LBHF and RBKC would expect to see a mix of market unit sizes with a significant quantity of larger family sized units (3 bedrooms or more) and also consider the needs of extended families.

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## Alternative Accommodation

### **Key Principle HO15:**

Any application for comprehensive development should provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students.

5.36 In addition to conventional residential accommodation, a variety of other accommodation offers should be provided through any redevelopment proposals, such as student accommodation and Extra Care Housing. This is supported by Policy CH2 of RBKC's Core Strategy (2010), which "*encourages extra care housing, particularly in the south of RBKC*" and by Policies H4 and H6 in LBHF's Core Strategy (2011), which support applications for housing for people who need care and support and applications for student housing in the OA respectively. Any older people's housing should be provided on the same basis of affordable to market housing as set out in Key Principles HO6 And HO7.

## Housing Space Standards

### Key Principle HO16:

All new housing should accord with the standards in the Mayor's London Plan (2011) and the [Mayor's draft Housing SPG \(2011\)](#).

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5.37 The Mayor's London Plan (2011) includes minimum space among other design standards for all new housing (Policy 3.5). [The Mayor's draft Housing SPG \(2011\)](#), expounds Policy 3.5 of the Mayor's London Plan (2011) and reflects aspects of the Mayor's Housing Design Guide (2009). Para 35.3.13 of RBKC's Core Strategy (2010) states that the standards in the Mayor of London's Housing Design Guide "will inform requirements within the Borough".

Deleted: The Mayor's Housing SPG EiP draft (2010)

5.38 Any development proposals within the OA will need to have regard to the [Mayor's draft Housing SPG \(2011\)](#) standards, including the minimum amount of internal floor area (GIA). Table 3.3 of the Mayor's London Plan (2011) is shown here in Table 5.1. In addition to this, wheelchair accessible dwellings in RBKC will need to meet the minimum floorspace requirements in the RBKC Access Design Guide, 2010.

Deleted: Mayor's Housing SPG EiP draft (2010)

Table 5.1: Minimum internal floor areas as set out in Table 3.3 in the Mayor's London Plan (2011)

5.39 Whilst it is noted that these are minimum standards, there is an expectation that where they are exceeded, the vast majority of dwellings will not be greatly in excess of these standards. There is market demand for exceptionally large dwellings, particularly in Kensington. It is fair that some dwellings are provided for this market. However, the over-riding priority is to provide dwellings of a size that meet the expectations of the vast majority of Londoners, to contribute to addressing the chronic shortage of ordinary-sized housing across London.



## Amenity Space

### Key Principle HO17:

All new homes must be carefully designed and laid out to have satisfactory access to gardens or other outdoor amenity space. Family dwellings at ground or podium levels should have access to private gardens. Balconies may be provided where appropriate subject to design, location and context (e.g. overlooking shared private space).

5.40 The Mayor's draft Housing SPG (2011), standard 4.10.1 sets out a requirement for a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm to be provided for each individual occupant.

Deleted: The Mayor's Housing SPG EIP draft (2010)

5.41 The LBHF Unitary Development Plan (2007) requires residential accommodation at ground floor level to provide 36sqm amenity space for family units and 14sqm for non-family units. It is recognised that this standard may not be deliverable in higher density developments such as in this OA, although every effort should be made to achieve it. LBHF's Core Strategy (2011) Policy H3 requires gardens and shared amenity space to be included within development proposals. RBKC's Core Strategy (2010) Policy CH2 requires "housing schemes to include outdoor amenity space".

## Accessible Housing

### Key Principle HO18:

10% of residential units in each borough must be wheelchair accessible.

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### Key Principle HO19:

All residential units must be built to Lifetime Homes standards.

5.42 Both boroughs' Core Strategies require 10% of residential units to be wheelchair accessible and all new build dwellings to be built to "Lifetime Homes" standards (Policy CH2 in RBKC's Core Strategy (2010) and Policy H4 in LBHF's Core Strategy (2011)).

5.43 Within the West Kensington and Gibbs Green housing estates there are a number of disabled residents who live in wheelchair accessible units. Some of these units have been adapted to provide for particular disability needs, but other units have not been adapted because the existing home is not practically capable of adaptation.

5.44 Where a continued need exists, or indeed, where there is a new need arising from the estate residents, the priority in terms of accessible housing in LBHF should be the provision of the appropriate amount of wheelchair and adapted units in order to cater for the needs of these existing estate residents.

5.45 Beyond catering for the needs of the estate residents, there should be further provision of wheelchair accessible units to top up the overall provision across the scheme so that in total, wheelchair accessible dwellings constructed total at least 10% of all new residential dwellings in each borough. This top-up provision should be spread evenly across tenures, and across all Extra Care units constructed in the OA.

5.46 Further advice on achieving Lifetime Homes standards is set out in LBHF's Access For All SPD and RBKC's Access Design Guide SPD.

Figure 5.8: Photograph of a new housing development at St. Andrews, Bromley by Bow. Photograph by A&M Photography

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## **Employment Strategy**

### **Overview**

#### **Key Objective**

**Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.**

6.1 This Employment Strategy focuses on two aspects. First, it addresses the provision of a suitable quantity and variety of business floorspace, as this is likely to make the greatest contribution to the minimum new jobs target of 7,000. Second, it sets out the authorities' strategy for securing employment and training across all employment sectors.

6.2 For the purposes of this SPD, business uses are defined as all those land uses within Class B1 of the Use Classes Order 2010, which covers offices (B1a), research and development (B1b) and light industrial (B1c). In addition to the business sector, jobs will also be created in culture and retail which will 'count' towards the 7,000 jobs total, but are not addressed in this chapter.

### **Context**

6.3 The OA currently contains two significant office buildings. The Empress State Building is the largest and most prominent of these, providing over 40,000sqm (GEA) of floorspace and is currently occupied by the Metropolitan Police. It was originally developed as a hotel in 1961 but subsequently converted to office use and was refurbished and extended by three floors between 2001 and 2003. The second office building is Ashfield House on the northern boundary of the site, which provides 8,600sqm (GEA) of floorspace and is currently occupied by Transport for London. In addition to this, the OA currently accommodates a number of small and ancillary office spaces including Clear Channel advertising on West Cromwell Road, the TfL Lillie Bridge Road Depot, the Earl's Court Exhibition Centres, the Adel Rootstein Ltd light industrial premises on Beaumont Avenue and a number of small light industrial premises on Rickett Street and Roxby Place.

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## **Policy Context**

### **6.4 The Mayor's London Plan (2011):**

'Offices' (Policy 4.2); and  
'Improving Opportunities for All' (Policy 4.12).

### **6.5 LBHF's Core Strategy (2011):**

'Planning for the Location of Employment Activities' (Strategic Policy B);  
'Strategic Site and Housing Regeneration Area – FRA 1'; and  
'Local Economy and Employment' (Policy LE1).

### **6.6 RBKC's Core Strategy (2010):**

'Earl's Court' (Policy CP10 and associated Vision);  
'Location of Business Uses' (Policy CF5);  
'Earl's Court Exhibition Centre' (Policy CA7); and  
'Infrastructure Delivery and Planning Obligations' (Policy C1).

Figure 6.1: Illustrative diagram showing the potential distribution of businesses the OA

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## Business Provision

### Existing Businesses

#### Key Principle ES1:

Existing business floorspace in the OA should be renewed and modernised or replaced through development proposals to maintain and intensify existing employment provision. Applicants should establish the requirements of existing tenants through consultation and demonstrate how these have been taken into account in their proposals.

6.7 Office and light industrial based employment makes a significant contribution to employment provision in the OA. This existing employment base should be retained and expanded through modernisation or replacement of the existing stock. Applicants should consult existing office and light industrial tenants at an early stage to ensure that their requirements are taken into account in development proposals. This should include an assessment of the existing jobs provision and the quantum of business floorspace.

### Future Business Floorspace Provision

#### Key Principle ES2:

Proposals in the OA should incorporate additional business floorspace totalling approximately 90,000sqm (GEA) across the OA, primarily to meet local demand in both boroughs.

6.8 The Opportunity Area Office Study (2011) was commissioned to determine the scope for business provision in the OA having regard to the policy context and the supply of and demand for office floorspace at the local and sub-regional level. It considered a range of business floorspace provision in conjunction with the initial development capacity scenarios developed for the OA (please see Development Capacity Scenarios supporting evidence paper).

6.9 The study identifies a shortfall in the supply of business floorspace at a local level and at the wider sub-regional level, particularly in the central London sub-region. Supply constraints, particularly within Westminster, could mean that demand will be displaced to elsewhere in the sub-region. It is expected that schemes coming forward in the OA will contribute towards meeting the identified shortfalls in supply of

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business floorspace particularly at the local level and achieving the indicative new employment capacity of in excess of 7,000 new jobs.

6.10 The study establishes that additional business floorspace provision totalling approximately 90,000 sqm (GEA) across the OA will meet the local shortfall and some of the sub-regional shortfall without compromising other key principles in this document or LBHF's or RBKC's Core Strategies.

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## Nature and Phasing

### Key Principle ES3:

New business floorspace should be phased so that up to half of the overall quantum is delivered in the early phases of redevelopment in the OA, with the remainder being provided in the later phases. Business floorspace in the early phases will need to incorporate provision for small and medium-sized enterprises. Applicants should have regard to the spatial distribution described below.

6.11 It is anticipated that sites in the OA will be developed on a phased basis over at least a twenty year period. The provision of the total amount of additional business floorspace envisaged in Key Principle ES2 too early in this period would risk undermining LBHF's Core Strategy Strategic Policy B. The Opportunity Area Office Study (2011) identified the importance of establishing the OA as a new neighbourhood before it would be attractive for business occupiers in terms of accessibility, amenity and the nature of business accommodation provided. This will take time to establish and is particularly important in terms of attracting larger office occupiers, who may be making a choice between a number of areas in London.

6.12 Therefore, business floorspace provision in the early phases of development will typically need to be flexible and smaller in scale in order to meet local need, particularly that of small and medium-sized enterprises. This should include small office buildings and business floorspace in mixed-use buildings. This type of provision can be readily integrated with residential, retail, leisure, cultural and community uses, which are anticipated to be the predominant uses in the early phases.

6.13 Business floorspace in the early phases should largely be focussed within the vicinity of the Empress State Building. Smaller concentrations of business floorspace might also be found near to transport hubs and on routes through the OA, where this does not conflict with residential uses. Spatial testing has identified that up to half of

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the business floorspace provision envisaged in Key Principle ES2 could be accommodated in these areas.

6.14 The remainder of the business floorspace will be delivered in the later phases and will typically comprise larger units and discrete office buildings. The authorities envisage that this type of accommodation will be focussed in the north of the OA fronting onto West Cromwell Road (A4). The Urban Form Strategy (Chapter 4) refers to this location as the 'Metropolitan Face' of the OA. It has the potential to offer an attractive and high profile location for larger office occupiers provided that it is integrated into the new neighbourhood created in the OA and benefits from the associated amenities.

### **Variety and Adaptability**

#### **Key Principle ES4:**

Development proposals for business floorspace should incorporate variety in the type, size, cost and terms (lease arrangements) of accommodation and be designed to be readily adaptable for use by a range of tenants. Provision of business space suitable for very small, small and medium-sized enterprises and incubator units to meet borough level demand will be expected in the early phases. Later phases should accommodate a variety of sizes of units but could include larger office floorplates over 1,000 sqm.

#### **Key Principle ES5:**

The authorities will secure the provision of affordable business space for very small, small and medium sized enterprises and incubator units across all phases of development.

6.15 Business units will need to be designed to be readily adaptable for use by a range of tenants, including single occupier and multi-let space at a variety of scales. The Opportunity Area Office Study (2011) identified that typical floor sizes in the order of 1,000 – 2,000sqm are most likely to be appropriate to meet demand arising at a sub-regional level, given the potential range of occupiers, although this may change over time. Provision for local demand will need to be smaller and more flexible, including a range of unit sizes typically below 1,000 sqm.

6.16 The early phases of development in both boroughs should provide for very small, small and medium-sized enterprises, including dedicated incubator units with shared central services. The authorities will secure affordable business space within this offer and will secure affordable space within mixed use and larger office proposals, which are likely to be more acceptable in later phases.

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## Employment and Training

### Protecting Existing Employment

#### **Key Principle ES6:**

Any applications proposing the redevelopment of the OA must, in consultation with the Economic Development Teams of both boroughs, include measures, during and post construction, to protect businesses outside of the OA affected by development.

6.17 The hinterland surrounding the OA represents a significant source of existing employment and economic activity. Many of these employers have grown to serve the needs of the Earl's Court Exhibition Centres. In the Earl's Court ward alone there are 117 businesses and a workforce of 1,725 employees providing accommodation and food service activities.

6.18 Both boroughs will require steps to be taken to mitigate against the impact development will have on existing local employers brought about by the loss of the Earl's Court Exhibition Centres and the period of construction. This should include sector specific support, improvements to neighbouring trading environments, training and retraining, contributions to commercial centres' management and business engagement and consultation. Proposals must include a strategy demonstrating how the requirements of LBHF and RBKC have been met.

### Local Procurement Opportunities

#### **Key Principle ES7:**

Developers should put in place procedures to ensure small and medium sized local enterprises (local SMEs) have access to tender opportunities for the procurement of goods and services generated by the development both during and after construction, having regard to the councils' Local Procurement Code of Practice.

6.19 The authorities will require the developers to champion the benefits of using local businesses in the supply chain and ensuring that a greater proportion of expenditure is retained in the local economy. Local businesses are more likely to employ local labour and will therefore increase the sustainability of the development by reducing travel distances.

6.20 The Councils have produced a joint Local Procurement Code of Practice, which requires developers and their contractors to agree policies and procedures

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with the boroughs' Economic Development teams to ensure that local businesses have access to tender opportunities for the procurement of goods and services.

6.21 The Councils will regularly monitor the proportion of local procurement opportunities and will require any developer to submit information about contract tendering activity with local businesses and its outcomes. Information should be submitted from the developer in respect of contract tendering activity and the outcomes with regard to local businesses.

6.22 A financial contribution will be sought toward the costs of facilitating local procurement, which could include the establishment of a local enterprise screening service, brokerage with contractors and owners, periodic 'Meet the Buyer' and business briefing events, the maintenance of a directory of suppliers, support for businesses to become tender ready and performance monitoring. The mechanism for determining the level of contribution is set out in the Local Procurement Code of Practice.

### Variety and Adaptability

#### **Key Principle ES8:**

Applications for comprehensive redevelopment will be expected to deliver and any other applications will be expected to contribute towards:

- support and funding of Workplace Coordinators working within the developer's project team to ensure that local people benefit from employment opportunities throughout the development;
- the provision of a recruitment & employability Construction Training Centre before and during construction; and
- the provision of a post construction standalone Recruitment and Job Shop in a focal point of the development.

6.23 Financial contributions will be sought from developers to fund Workplace Coordinators, in line with the principles of the councils' joint Employment and Training Code. The postholders will work closely with and be located within the developer's project team. The Coordinators will work to meet the identified employment needs of key partners, contractors and suppliers and coordinate links with external agencies to provide suitable candidates. The Councils consider this role to be critical in steering job opportunities towards local people and demonstrable practical gains should result from this initiative (i.e. in numbers of residents getting employment in the development). In addition the Councils see increasing

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employment opportunities for local people with disabilities, vulnerable groups, [young offenders](#) and those furthest from the labour market as equally important and the Workplace Coordinators will play a key role in delivering this.

6.24 Developers will be expected to provide a recruitment and employability Construction Training Centre in the OA before and during construction and a standalone Recruitment and Job Shop post construction, within a focal point of the development. The Recruitment and Job Shop should serve as a highly visible focal point for residents looking to undertake vocational skills training relevant to local job vacancies and obtain work experience and apprenticeship opportunities, as well as to assist employers in recruitment.

### Local Employment Opportunities

#### Key Principle ES9:

Any applicant seeking permission for comprehensive redevelopment should agree to provide a Local Labour, Skills and Employment Strategy and a Local Labour, Skills and Employment Delivery Plan.

6.25 The authorities will seek the provision of a Local Labour, Skills and Employment Strategy and Delivery Plan as part of any planning agreement associated with any application for comprehensive redevelopment. Both documents would need to be produced by the applicant in close partnership with both RBKC and LBHF Economic Development teams in line with the principles of the Councils' joint Employment and Training Code, which is available from either of the councils' Economic Development teams.

6.26 The Strategy would need to incorporate predictions on labour demand, skills requirements, targeted recruitment drives, target-setting with contractors and sub-contractors, mechanisms for monitoring employee and contractor employee residency data, jobs fairs, community and careers events and initiatives to increase employment sustainability for local people. In addition, it will be expected to include details of activity [to support re-training of individuals affected by the closure of the exhibition centres, activity](#), to provide professional input to career days, teacher training and work experience for young people from both boroughs.

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6.27 The Delivery Plan should focus partnership efforts and incorporate complementary activity. This could include links with Job Centre Plus, local schools

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and colleges, adult education & learning services and Education Business Partnerships.

## **Retail Strategy**

### **Overview**

#### **Key Objectives**

New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and

Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

### **Context**

7.1 This chapter sets out the requirements for the location, capacity and type of retail provision in the OA. For the purposes of this SPD, retail uses are defined as all those land uses within Class A of the Use Classes Order 2010, which includes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés), A4 (drinking establishments) and A5 (hot food take-always).

7.2 There are four designated shopping centres within the immediate vicinity of the OA. These are Fulham Town Centre and North End Road (West Kensington) Key Local Centre in LBHF and Earl's Court Road Neighbourhood Centre and Old Brompton Road (West) Neighbourhood Centre in RBKC.

7.3 Further away from the OA there are several very important and successful higher order centres, such as Shepherd's Bush, Hammersmith, Kensington High Street, and King's Road. In addition to the local convenience function, these centres are also important comparison shopping destinations with a catchment that includes the OA.

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## **Policy Context**

### **7.4 The Mayor's London Plan (2011):**

'Retail and Town Centre Development' (Policy 4.7),  
'Supporting a Successful and Diverse Retail Sector' (Policy 4.8), and  
'Small Shops' (Policy 4.9).

### **7.5 LBHF's Core Strategy (2011):**

- 'Hierarchy of Town and Local Centres' (Strategic Policy C), and
- 'Strategic Site and Housing Regeneration Area - FRA 1'.

### **7.6 RBKC's Core Strategy (2010):**

- 'Earl's Court' (Policy CP10 and associated Vision),
- 'Earl's Court Exhibition Centre' (Policy CA7),
- 'Location of New Shop Uses' (Policy CF1), and
- 'Retail Development within Town Centres' (Policy CF2).

Figure 7.1: Illustrative diagram showing the potential distribution of retail across the OA

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## Retail Capacity (Comparison)

### Key Principle RS1:

Comparison retail demand generated by the new development should be accommodated within existing surrounding town centres. Any comparison retail that cannot be accommodated within existing surrounding town centres should primarily be provided along North End Road, as an extension to Fulham Town Centre, where the potential for an anchor store should also be explored.

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7.7 The level of retail capacity deemed appropriate within the OA will be based on the ability of existing centres in the vicinity to soak up the identified need. Any retail proposals for development outside of these centres would need to demonstrate that the level of retail proposed is in accordance with the below capacity figures is for the day to day needs of the OA or is complementary to the cultural facilities, and cannot be accommodated in existing centres. Applicants should demonstrate flexibility in terms of scale and scope when showing what capacity the existing retail centres have to provide for the needs of new development in the OA.

7.8 The three authorities commissioned retail consultants, Roger Tym and Partners (RTP), to conduct a Retail Need Assessment for the OA, which reported in December 2010. This assessment considered the scale of existing expenditure and potential expenditure growth, in order to identify whether any new retail floorspace is needed in the wider Study Area (as shown on Figure 7.2). This Study Area includes several existing centres, such as Hammersmith Town Centre and Fulham Town Centre in LBHF and Earl's Court Road, Fulham Road West, Kensington High Street, South Kensington and Fulham Road East (Brompton Cross) in RBKC.

7.9 RTP recognised a "quantitative need for between 34,100 and 38,200sqm gross of A Class (excluding A1 service and A2) floorspace by 2016, increasing to between 62,300 and 71,300sqm gross by 2021" for the entire Study Area. RTP advised that "there is physical capacity for growth in the centres within and outside the Study Area that could be used to absorb the growth identified", which is consistent with the requirements of Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) and the policy context set out above. RTP also advised that "there is an opportunity for growth within the Opportunity Area through the masterplanning process".

7.10 Any comparison retail proposed within the OA should be steered towards North End Road, where it will act as an extension to Fulham Town Centre. The

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provision of an anchor store in this location should be explored, which has the potential to draw more of a pedestrian footfall up from the Fulham Broadway end of Fulham Town Centre and help to invigorate the middle section of North End Road, where the vitality and viability of retail has struggled in recent years.

Figure 7.2: Retail Need Assessment Study Area

## Location of Local Needs Retail

### Key Principle RS2:

Retail to meet the day-to-day needs of residents and workers should be accommodated:

- Within and next to Fulham Town Centre;
- Within and next to North End Road (West Kensington) Key Local Centre and around public transport hubs (West Brompton and Earl's Court); and
- a new centre within the OA.

7.11 The primary focus for new retail floorspace should be within and adjacent to Fulham Town Centre. Through the regeneration of the OA, there is an opportunity to repair the existing gaps in the non-residential frontage along the eastern edge of North End Road in order to create a rejuvenated, two sided retail street.

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7.12 Retail should then be steered towards North End Road (West Kensington) Key Local Centre and the areas where the highest levels of pedestrian activity are expected, such as around the Earl's Court (Warwick Road entrance) and West Brompton Underground stations.

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7.13 It is expected that the new centre within the OA will be of a local scale. The authorities would encourage the new centre to be located within the vicinity of the Empress State Building where it is also expected that the cultural facilities will primarily be located. This centre will therefore also have the potential to complement the new cultural facilities (please see Chapter 8).

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7.14 Other non-residential uses such as offices, hotels and cultural and community uses would be appropriate in any of the retail locations identified above.

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## Impact of Retail

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**Key Principle RS3:**

Applicants must demonstrate that any retail proposed within the OA has a minimal impact on existing centres surrounding the OA.

7.15 The location and scale of retail considered appropriate within the OA should be determined through a Retail Impact Assessment, prepared in accordance with PPS4 or successor national policy guidance and Policy 4.7 of the Mayor's London Plan (2011). This must assess the amount of retail development that may be accommodated in particular locations, without having a negative impact on the existing centres in the wider area, and which will allow the existing centres to benefit from a significant proportion of expenditure growth.

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**Key Principle RS4:**

The provision of retail floorspace should reflect the phasing of the development and be related to the day to day needs of those living and working in the OA at each phase.

7.16 New retail should be provided in a way that reflects the phasing of the redevelopment, taking into account the day to day needs of the rising residential and worker population. Too much retail provided too early in the development might harm existing centres. The phasing and timescales of the retail floorspace should be developed accordingly.

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Figure 7.3: Retail on North End Road (northern end)

## Retail Controls

### Key Principle RS5:

The authorities will control the nature of new retail proposed in the OA by securing a binding Retail Management Plan as part of any planning agreements.

7.17 The authorities will control, through Section 106 agreements and planning conditions, the scale, nature and character of any retail proposed in the OA, in order to ensure that it does not have a detrimental impact on the existing centres and that it responds appropriately to the existing character of the OA and its surroundings. The primary mechanism that the authorities will employ in order to achieve this is to require the applicant to submit a Retail Management Plan, which through a planning agreement, would be a binding document within the terms of which the applicant would be required to operate. The Retail Management Plan will control issues such as:

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- phasing,
- unit sizes,
- convenience/comparison split by floorspace,
- limitations on other retail-related uses (A classes),
- range and number of independent shops,
- triggers and sanctions to ensure delivery of an applicant's retail concept,
- prohibition on mezzanines; and
- active frontages.

Figure 7.4: Local retail offer with active frontages

### Key Principle RS6:

The priority in terms of retail typology should be the provision of narrow fronted ground floor units that create a legible streetscape and provide in-built flexibility for expansion and reduction depending on market demands.

7.18 The retail units in the three existing retail centres in the vicinity of the OA primarily consist of ground floor premises within Victorian properties. As a consequence, the unit sizes within these premises tend to be relatively narrow, except where more than one have been combined. These narrow shop fronts create a varied and lively streetscape that is not overly dominated by one or two excessively large retail premises. The authorities wish to see this existing character used as a design precedent for any retail proposed within the OA. In order to create mixed and diverse communities, the upper floors should be predominantly residential, although

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some may be appropriate for offices. The width of the shop fronts should be reflected in the upper floors, providing vertical emphasis to the buildings.

7.19 The exception to this rule is in the extension of Fulham Town Centre in North End Road, where larger format retail units would be appropriate if commercially viable. Careful attention must be paid to their design to ensure they complement the existing character of the street.

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**Key Principle RS7:**

A number of small units will be secured as affordable shops to provide accommodation for retailers deemed essential for a good retail offer, but that are not able to afford full rents.

7.20 Smaller retail units tend to be occupied by independent retailers or 'local' shops, which both Councils encourage through any development proposals. Policy 4.9A of the Mayor's London Plan (2011) para. 7.24 of LBHF's Core Strategy (2011) and Policy CF2 of RBKC's Core Strategy (2010) set out an expectation that affordable retail units should be secured as part of any large scale retail proposals. The authorities will expect an element of affordable retail to form part of any retail offer within the OA, which will be secured through any planning agreement.

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Figure 7.5: An independent retailer in the local area

## North End Road Market

### Key Principle RS8:

Any application for comprehensive redevelopment of the OA should allocate land, with a North End Road address, for the potential relocation of North End Road street market.

7.21 North End Road Market currently operates as an on-street market on North End Road in Fulham Town Centre. Although the market currently creates a bustling atmosphere, its on-street location also increases traffic congestion on North End Road and reduces public safety. LBHF's Core Strategy (2011) Policy FRA states that *"relocation (of the market) to an off-street location should be sought, but dialogue should take place with street traders to ensure a logical solution that contributes to the wider regeneration of the area as a whole. The potential regeneration of the Opportunity Area may present new opportunities for relocating the market in the long term"*.

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7.22 Redevelopment of the OA provides an opportunity to consider relocating the market to within the OA, enhancing its attractiveness and securing its future provision, whilst maintaining its links with North End Road. Space for the relocated market could either take the form of a market square, a wider footway alongside a street or a covered market provided on a major pedestrian thoroughfare through a building. As part of this relocation, adequate facilities should be provided for the auxiliary needs of the market, such as the storage of temporary stalls, the collection of waste and the needs of delivery vehicles so that they do not clutter streets or inhibit other movement and permeability.

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7.23 Any decision to relocate the market would be predicated on discussions between LBHF Council and street traders in order to ensure a workable solution. Were the decision to be made to not move the market to this location, the applicants would have the opportunity to put the allocated land to an alternative use. In this instance, LBHF would need to be satisfied that any alternative use would not impact negatively on the vitality and viability of the existing North End Road market.

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Figure 7.6: North End Road Market

## **Culture Strategy**

### **Overview**

#### **Key Objectives**

Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and

Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

8.0 This chapter sets out requirements to create a cultural destination ~~consisting~~ of cultural facilities; associated uses, including artists' studios and space for creative industries; public art and hotels.

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Figure 8.1: Earl's Court Exhibition Centre 1

### **Context**

8.1 Since the 1880s a variety of culture and entertainment activities, including various shows, exhibitions and a gigantic Ferris wheel, have taken place on the Earl's Court site giving it its cultural 'brand'. In the late 1930s, Earl's Court Exhibition Centre 1 (EC1) was opened to provide over 50,000m<sup>2</sup> of exhibition space. In the early 1990s Earl's Court Exhibition Centre 2 (EC2) was opened. The Earl's Court Exhibition Centres are internationally recognised for hosting significant cultural events, including the Brit Awards, world famous music concerts and various exhibitions / shows, such as the Ideal Home Show.

8.2 The Exhibition Centres will host the indoor volleyball during the 2012 Olympic Games, which will further reinforce Earl's Court as an international cultural brand.

8.3 The Exhibition Centres make a significant contribution to the local economy, as many shops, restaurants and hotels in the surrounding area benefit from the close proximity to this major visitor attraction.

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## **Policy Context**

### **8.4 The Mayor's London Plan (2011):**

Earl's Court and West Kensington Opportunity Areas; and

'Support for and enhancement of arts, culture, sport and entertainment provision' (Policy 4.6).

### **8.5 LBHF's Core Strategy (2011):**

'Strategic Policy FRA'; and

'Strategic Site and Housing Regeneration Area – FRA 1'.

### **8.6 RBKC's Core Strategy (2010):**

'Earl's Court' (Policy CP10 and associated Vision);

'Earl's Court Exhibition Centre' (Policy CA7);

'Creative and Cultural Businesses' (Policy CF6); and

'Arts and Cultural Uses' (Policy CF7b).

Figure 8.2: Illustrative diagram showing the possible locations of cultural facilities

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## A New Cultural Destination

### Key Principle CS1:

Any redevelopment of the OA that involves the loss of EC1 and/or EC2 should create a new strategic leisure, cultural and visitor destination, providing a range of cultural, artistic and creative facilities.

8.7 The aim is to continue Earl's Court's reputation as a cultural destination. The new cultural destination must create an attractive place, with a distinctive cultural identity. Examples of cultural facilities that create successful destinations include: The Kunstmuseum (Stuttgart), Sadler's Wells (Islington), The Lowry Centre (Salford), The Public (West Bromwich), Millennium Square (Bristol) and the Saatchi Gallery in Duke of York's Square (King's Road).

8.8 In addition to the cultural uses, the design of buildings and spaces should contribute to this cultural identity. Buildings must be of exceptional architectural quality to mark the location of this important destination. Locating the cultural destination in the vicinity of the Empress State Building could also give meaning to the height and presence on the skyline of this existing landmark. This cultural destination should be further enhanced by supporting artistic and creative uses, public art and the use of external space for suitable exhibitions and events. However, the use of external space must not have a negative impact on the residential amenity of new and existing residents in the area.

8.9 This cultural destination will benefit residents and visitors, but it will also be important to existing businesses in the surrounding area who currently rely on the existing Earl's Court Exhibition Centres for a lot of their business (as set out in Key Principle ES6 of the Employment Strategy). The cultural destination will therefore need to be delivered in the earliest phases. Shops and services may serve and complement the cultural destination, while providing street level interest. The nature of this retail provision, together with measures to ensure it complements the cultural destination, will be controlled through the Retail Management Plan, as set out in Key Principle RS5.

8.10 A written strategy will be required for all planning applications involving the demolition of EC1 and/or EC2, demonstrating how that application proposes to develop the OA into a viable cultural and creative destination. This strategy will need to include details of the location, size, management and capacity of the proposed facilities, together with an assessment of their likely impact on residents and

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businesses in the wider area. This strategy will also need to include details on the disposition of supporting land uses, including affordable artists' studios, other creative workshop and studio space and details on how the retail strategy will support the cultural destination. Where proposed, planning conditions will be used to require more detailed cultural strategies that will, among other things, include details on the user / occupier of proposed cultural facilities. The Mayor of London and the boroughs must be engaged during the preparation of the cultural strategies.

**Key Principle CS2:**

Redevelopment of the OA will need to provide at least one large cultural facility to form an anchor, together with a number of other such facilities, to form a cultural destination.

8.11 An analysis of various cultural venues throughout Great Britain is shown in Table 8.1. With this in mind, the authorities will expect that, to be considered 'large', cultural facilities should have:

- a minimum footprint of 2,500sqm (GEA);
- a minimum floorspace of 10,000sqm (GIA);
- a hosting capacity of at least 2,000 visitors; and
- attract approximately 750,000 visitors per year.

**Deleted:** the British Isles (as shown in Table 8.1) suggests that large cultural facilities have:¶

8.12 The extent to which one or several attractions anchor the cultural destination will not only depend on the size of the venue(s), but also the offer, location and how the attraction(s) are supported by smaller cultural venues, artists' studios, other creative workshop and studio space and bars / restaurants. Table 8.1 lists examples of smaller cultural facilities, showing that they can occupy relatively small spaces, which is likely to meet a demand for cultural space from local organisations. The extent to which the arts and cultural offer create a destination must therefore be considered in the cultural strategy, as required above.

**Deleted:** There is also an opportunity to provide a number of additional cultural facilities to support and complement the larger cultural facility or facilities.

8.13 RBKC Core Strategy Policy CA7d indicates that a cultural facility must be located near to public transport accessibility. As Earl's Court Underground Station is the busiest station in the OA, at least one cultural facility must be located in the same general location. The type, size and offer must be such to sustain a culture facility in this location for the longer term. In this location it will help to create a sense of arrival to the OA from Earl's Court Underground Station. It will also ensure cultural facilities are provided early in the site's development, aiding those existing business that depend on the current footfall from the exhibition centres.

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8.14 In addition to delivering a cultural destination, financial contributions will also be sought for enhancements to nearby heritage attractions, such as Brompton Cemetery.

**Key Principle CS3:**

Redevelopment of the OA will need to provide affordable artists' studios and other creative workshop and studio space.

8.15 In addition to the cultural facilities, redevelopment of the OA will need to provide affordable artists' studios and other creative workshop and studio space. The Mayor of London's Cultural Strategy (2012 and beyond) states that 'an important means by which arts and culture have contributed to urban regeneration is through workspace and artist studios'. This strategy makes specific reference to the large and constant demand for artists' studio space in London, quoting one specific provider, ACME, who have a waiting list of more than 3,500 artists. The strategy required under Key Principle CS1 will need to include information on the design, location, size, management and number of artists' studios and other creative workshop and studio space and its affordability.

**Key Principle CS4:**

Redevelopment should create opportunities to use art and culture to engage the new and existing communities at various stages and phases throughout the redevelopment.

8.16 Culture and art can play an important role in integrating the existing and new communities, whilst also keeping the existing community engaged through the development process. This can happen at various stages during the construction process, such as engagement events with the existing community (explaining aspects of the development process); using art or relevant information to improve the look of the hoardings during demolition and construction; and events where the new and existing community have an opportunity to interact. Applicants should also explore opportunities for vacant buildings to be used to accommodate pop up exhibitions and cultural events; although in some instances planning permission and event licences may be required. The authorities will expect that the strategy required under Key Principle CS1 sets out approaches to delivering this principle, where measures would be secured through planning condition or planning agreement.

Table 8.1: Cultural Venue case studies

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## Public Art

### Key Principle CS5:

High quality public art will be required to enliven public spaces, create distinctive places and contribute to the identity of the cultural destination.

8.17 Public art can help to create a sense of place and identity by adding to the character of the townscape. This is particularly important when considering the type of place or identity being created in the cultural destination. However, public art must always be of the highest quality, and be carefully located so it does not restrict pedestrian movement or add to street clutter. The local community should be engaged in the design and location of new public art installations.

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8.18 Policy 7.5B of the Mayor's London Plan (2011) states that 'Opportunities for the integration of high quality public art should be considered'. Guidance on public art is also provided in the Mayor's Cultural Strategy (2012 and beyond). RBKC's Core Strategy (Policy CR4) 'requires all major development to provide new public art that is of high quality and either incorporated into the external design of new buildings or within the public realm'. Public Art in RBKC would also need to have regard to RBKC's Public Art Supplementary Planning Guidance, 2004.

8.19 The civic spaces required under Key Principle UF10, will need to demonstrate how public art is integrated into design of the public realm for the entire OA.

Figure 8.3: The Silver Bean in Chicago. Photograph by Tim Weston

Figure 8.4: 'Unfurl', by Ellis O'Connell at Kensington Gate

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## Hotels

### **Key Principle CS6:**

Any application for the comprehensive redevelopment of the OA will be expected to include an element of hotel provision. At least 10% of the bedrooms in any hotel development should be wheelchair accessible.

8.20 There is a high concentration of hotels within the vicinity of the OA and the one hotel that is located within the OA (295 North End Road). The concentration of hotels is mainly due to the number of visitors attracted by Earl's Court's accessible location and the Exhibition Centres.

8.21 Annex 1 of the Mayor's London Plan (2011) requires development in the OA to explore the provision of, amongst other things, hotels. Policy 4.5A of the Mayor's London Plan (2011) 'seeks to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10% should be wheelchair accessible'. Policy 4.5B of the Mayor's London Plan requires development to contribute towards meeting the requirements in Policy 4.5A. RBKC's Core Strategy (2010) Policy CA7e and CF8b identifies the Earl's Court Exhibition Centre Strategic Site as being an appropriate location for new hotels. LBHF's Core Strategy (2011) 'Strategic Site and Housing Regeneration Area - FRA 1' identifies hotels as an appropriate use as part of any comprehensive regeneration of the OA.

8.22 There are different hotel markets to be served, including the leisure market, where a spa and pool would be required, the business market, which would need conference facilities and a business centre, and the budget market. Comprehensive redevelopment of the OA is of a sufficient scale to meet the demand from different hotel markets.

## **Social and Community Facilities**

### **Overview**

#### **Key Objective**

Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

9.1 This chapter sets out the requirements for the type, quantum and broad locations for the provision of social and community facilities necessary to support the comprehensive redevelopment of the OA, in relation to the provision of:

- Education facilities (nursery, primary and secondary);
- Health facilities;
- Sports and leisure facilities;
- Police facilities; and
- Community and library facilities.

9.2 Please note, that there are other facilities often regarded as social and community uses, such as pubs, chemists and post offices. All these uses are shop uses, falling within the 'A' use classes, and are therefore dealt with as part of the Retail Strategy, see Chapter 7.

## **Policy Context**

### **9.3 The Mayor's London Plan (2011):**

- 'The 2012 Games and their Legacy' (Policy 2.4)
- 'Protection and Enhancement of Social Infrastructure' (Policy 3.16);
- 'Health and Social Care Facilities' (Policy 3.17);
- 'Education Facilities' (Policy 3.18); and
- 'Sports Facilities' (Policy 3.19).

### **9.4 LBHF's Core Strategy (2011):**

- 'Strategic Site and Housing Regeneration Area – FRA 1'; and
- 'Supporting Community Facilities and Services' (Policy CF1).

### **9.5 RBKC's Core Strategy (2010):**

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' Strategic Site' (Policy CA7);
- 'Infrastructure Delivery and Planning Obligations' (Policy C1): and
- 'Social and Community Facilities' (Policy CK1).

## Education

### Key Principle SC1:

Any planning applications within the OA will be assessed against both RBKC and LBHF child yield formulas below in order to provide the relevant educational (nursery, primary and secondary) floorspace and associated fit out costs to cater for the population uplift in the area.

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9.6 Educational provision in the vicinity of the OA is currently at capacity. Comprehensive redevelopment of the OA would lead to a large increase in population. Some of this population would be of school age and any development would need to cater for their educational needs.

9.7 Child yield formulas are used to estimate the possible educational needs resulting from any development. RBKC set out their child yield formula in their Planning Obligations SPD (2010), shown in Table 9.1. In LBHF, the 2004 Wandsworth Housing Survey has been used as the basis for child yield calculations (see Table 9.2). The model has been adapted to reflect LBHF's criteria for the allocation of intermediate housing, which gives priority to couples and single parents with children when allocating accommodation with two or more beds. [The methodologies of the boroughs' child yield formulas are consistent with and reflect GLA guidance and advice.](#)

9.8 Any planning application submitted for the redevelopment of the site would have to be assessed against these child yield formulas in order to ascertain the anticipated increase in nursery, primary and secondary school numbers.

9.9 The authorities will secure the provision of floorspace to cater for the needs arising from any development, as well as financial contributions towards the fit out of any educational provision. Developers should have regard to Building Bulletin 99 when calculating the quantum of floorspace necessary for a new primary school and Building Bulletin 98 when calculating the quantum of floorspace necessary for a new secondary school. Any primary and secondary school should be located together and should be positioned in an easily accessible location for all new residents living in the OA. The exact location should also be predicated on discussions with both borough's education departments, and should be provided within the early phases of development.

Figure 9.1: Hadley Learning Centre, Telford Photograph by Dave Morris

Table 9.1: RBKC child yield formulas

Table 9.2: LBHF child yield formulas

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## Health

### Key Principle SC2:

Any planning application for comprehensive redevelopment of the OA will need to provide a NHS health facility. The size of this facility should be calculated based on the methodology set out in this SPD. The facility should be located in an easily accessible location for all residents living within the OA and should be provided within one of the earlier phases of development.

9.10 Within both boroughs, the primary healthcare provision is currently at full capacity and the increase in population within the OA will give rise to demand for an additional NHS health facility. This should be provided in the form of a single facility within the OA, at an early phase in the development and in a location that would be easily accessible for residents living in both boroughs. If the optimum location for this facility is in one of the later phases, the facility could be moved at that stage, with the original premises being converted to an alternative use. The calculation for the size of this facility is based on the following methodology:

- If the population is under 10,800, applicants will be required to provide a Health Centre. The size of the facility will be calculated based on a need for 150sqm per GP and one GP for every 1,800 residents.
- If the population is over 10,800, applicants will be required to provide an integrated Primary Care Centre. The size of the facility will be calculated based on a need for 225sqm per GP and one GP for every 1,800 residents.
- Wandsworth's 2004 New Housing Survey should be used as the basis for calculating population yield.

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9.11 The primary healthcare centre must be fully accessible with a viable street presence and meet the current requirements for the Equality Act 2010. Reference to current NHS guidance for planning new Primary and Social Care Premises is set out in the Department of Health's (DH) Design Guidance including "Facilities for Primary and Community Care Services: Planning and Design manual 1183:0.6 England" published 2011 and "Health Building note (HBN) 00-10 Performance requirements for building elements used in healthcare facilities 8941:0.6 England" published April 2011. If an integrated Primary Care Centre is required it would need to include dental services, space to support the specialist skills that GPs are developing in response to local health and wellbeing needs, outreach facilities and home-based medical support.

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### Key Principle SC3:

Any major planning applications in the OA must be accompanied by a Health Impact Assessment.

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9.12 An analysis of the health impacts of the proposed developments will need to factor-in the following sectors:

Acute healthcare;

Mental healthcare;

Intermediate healthcare;

Primary healthcare.

9.13 The Health Impact Assessment would need to consider impacts on minority groups, future trends, emerging Government policy and health reforms and advances in technology and social change which may have an impact on future healthcare delivery, such as demographic shifts to an increasing elderly population. The Health Impact Assessment would need to assess impacts of demolition and construction on the new and existing population.



## Sports and Leisure

### Key Principle SC4:

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Any proposals for redevelopment of the OA must provide a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population. These facilities will need to cater for a variety of incomes. A proportion of affordable sports and leisure provision will be secured as part of any planning agreement. The facilities provided should target existing deficiencies in indoor and outdoor sports provision, particularly multi-use outdoor pitches and indoor multi-use sports courts.

9.14 Policy 3.20 of the Mayor's London Plan (2011) promotes applications that improve access to sports and leisure provision. Policy CF1 of LBHF's Core Strategy (2011) states that the OA is considered appropriate for major new leisure and recreation facilities. RBKC's Core Strategy (2010) also recognises the importance of access to sports and leisure, stating in para 29.2.4 that planning obligations will be negotiated to ensure access to such facilities.

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9.15 Any application will be expected to provide a range of sports and leisure facilities to cater for the needs of the future population. These facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. The authorities will secure a proportion of affordable sports provision. This should take the form of discounted membership fees and discounted non-membership access fees.

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9.16 Sport England data (Local Sports Profiles Toolkit 2011 et. al.), together with local data, shows there to be existing deficiencies in both indoor and outdoor sports provision, particularly multi-use outdoor pitches and indoor multi-use sports courts. Any applicant would need to consult the borough leisure departments and target these particular deficiencies in their sport and leisure offer.

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### Key Principle SC5:

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Any application for comprehensive redevelopment of the OA must provide sports facilities that allow at least one sport to be developed to an "elite" standard, in order to retain the legacy of the London 2012 Olympics.

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9.17 The Mayor's London Plan (2011) recognises the importance of the 2012 Olympic Games to London. Policy 2.4Ch states that "the Mayor will, and boroughs should take opportunities presented by the 2012 Olympic and Paralympic Games and their legacy to increase participation in sport and physical activity". The

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importance of developing sports infrastructure is recognised in the Mayor's Sports Legacy Plan, 'A Sporting Future for London'.

9.18 The Earl's Court Exhibition Centres are to be used during the 2012 Olympics for volleyball. In order to retain the sporting legacy of the site, any application for comprehensive redevelopment should ensure that the sports and leisure provision allows for at least one sport to be developed to an "elite" standard (i.e. it meets regional performance targets for one sport's governing body).

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## Police Facilities

### Key Principle SC6:

The authorities will secure, through any planning agreement(s):

- A community policing facility and financial contributions towards staffing the facility;
- Closed Circuit Television (CCTV) within the OA; and
- Financial contributions towards the expansion the boroughs' CCTV control centres.

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9.19 Both Councils' policing facilities are currently at capacity. Any development in the OA will need to contribute towards increasing the policing capacity needed to cater for the new population.

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9.20 The authorities will require development to deliver a police shop, located within a retail frontage. It should operate a small base from which the police can launch patrols and at which the new community would be able to have day to day contact with the police service. Financial contributions will be sought towards the staffing of this facility.

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9.21 CCTV will need to be provided by the developer and linked into the borough's CCTV network. Alternatively, a financial contribution will be sought for the boroughs to implement the CCTV. A contribution will also be required to increase staffing of the boroughs' CCTV control centres to cater for the increased demand from the expanded CCTV network.

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## Community Space

### Key Principle SC7:

Redevelopment of the OA must provide a community hub of 4,500m<sup>2</sup> GIA. This new community hub should have a library on the ground and possibly first floors, with the remainder of the building providing multi faith space, youth space, children's centre, affordable and flexible office, training and meeting space, adult learning and training space and halls for hire for use by the voluntary sector and residents. Provision must be made available for new community space before any existing community space is demolished.

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9.22 The OA is currently adequately served in terms of community space. The Gibbs Green and West Kensington estates each have their own community hall and there are a number of other community halls in the vicinity of the OA. There are two libraries in close proximity to the OA – Baron's Court Library in LBHF and Brompton Library in RBKC. Baron's Court Library has reduced opening hours and Brompton Library has limited capacity to accommodate any additional users and is not an ideal location for a library, given the population increase proposed in the OA.

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9.23 Redevelopment of the OA will need to reprovide any lost community floorspace as well as provide additional space to cater for the new population living within the OA. The boroughs have assessed the likely floorspace requirements that the new population will generate and will expect any proposals for comprehensive redevelopment to provide a community hub, with up to 4,500sqm Gross Internal Area, which combines community facilities. New development will need to ensure that the new community hub is available for hire before either of the existing community spaces are demolished or that temporary spaces of at least equivalent floorspace are provided.

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9.24 This new building must be provided within the early phases of development and must be easily accessible to the new community and residents of both boroughs, fronting onto a street with high footfall and designed as a new modern civic building, with a strong visual presence. The building must have active ground floor uses and should look to provide a variety of different community spaces, such as a library, multi faith space, youth space, children's centre, adult learning and training space, a community café, flexible office and community space and halls for hire. The authorities will require that the spaces provided are affordable and accessible to all and provide for diverse cultural needs.

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9.25 This community hub should not only provide a valuable resource for the local community and community groups, but should help new residents of the OA integrate into the existing social fabric. This could be achieved by providing community support, local information and information for new and existing residents on the progress of redevelopment in the OA.

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## **Transport and Accessibility Strategy**

### **Overview**

#### **Key Objectives**

Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;

Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and

Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

10.1 This chapter sets out what improvements to the transport network will be necessary to support development. These include improvements to the public realm to encourage walking, improved cycle facilities and increased capacity on the public transport and road networks. This chapter is informed by a Strategic Transport Study, a review of which can be found on the authorities' websites.

### **Context**

10.2 The OA is a transport dominated site with a mix of transport infrastructure adjoining or running through and under it. The local transport facilities play an important role in connecting Earl's Court to the rest of London and the UK as a whole but these connections also create significant local severance across the area particularly for pedestrians and cyclists, which impacts on local quality of life and accessibility to goods, services and employment.

10.3 As is the case in most of London there is an extensive pedestrian footway network along existing local streets and roads. However there are some areas where the quality of this network needs improving. This, along with the severance caused by the rail lines and Exhibition Centres, creates a barrier to north-south and particularly east-west pedestrian and cycle movement through the OA. This isolates the OA, reduces the attractiveness of walking and cycling and restricts access to local public transport.

10.4 The OA is served by three London Underground stations; Earls Court, West Brompton and West Kensington. These stations provide access to the District and

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Piccadilly Lines. West Brompton is also served by the Overground network and is a strategic interchange as designated by the Mayor's Transport Strategy providing a key interchange between orbital and radial rail services. The edges of the OA are thus well served with a high Public Transport Accessibility Level, but the centre has a low score of 2, on a scale of 0 (little or no access) to 6b (most excellent access).

10.5 The London Underground lines serving the OA are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly Lines in the AM peak period. Significant increases in capacity are planned and funded for the District and Piccadilly Lines as part of the London Underground upgrades. The District Line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is no definite date for the upgrade of the Piccadilly Line, which would provide a capacity increase of 24%, although it is expected to be complete prior to 2031. Crossrail is planned to open in 2018, which will release capacity on the Central Line, which in turn will draw passengers from the Piccadilly Line, thereby releasing some limited capacity.

10.6 All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound Southern trains services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancements. In addition, crowding will increase to over three people per square metre on all southbound services to West Brompton.

10.7 Significant parts of the highway network are currently operating at capacity with a number of traffic delays at junctions in and around the OA, including at all four corners of the site, during both peak periods as well as the weekend. These are illustrated in Figures 10.4 and 10.5 overleaf.

10.8 The A4 and the Earl's Court One Way System have a key role in the maintaining the performance of the strategic highway network. This also impacts on the ease and attractiveness of pedestrian and cyclist movement, residential amenity, access to bus services and the townscape of the areas through which they run, including the OA.

10.9 The OA currently includes 2,500 car parking spaces. On-street in RBKC there is a mixture of residents' and pay and display parking with limited spare capacity. In LBHF the available parking for visitors is greater because dual use parking bays are provided.

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## Policy Context

### 10.10 The Mayor's London Plan (2011):

- 'Strategic Approach' (Policy 6.1).

### 10.11 LBHF's Core Strategy (2011):

- 'Strategic Site and Housing Regeneration Area – FRA 1'; and
- 'Transport' (Policy T1).

### 10.12 RBKC's Core Strategy (2010):

- 'Earl's Court Exhibition Centre' (Policy CA7);
- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Improving Alternatives to Car Use' (Policy CT1); and
- 'New and Enhanced Rail Infrastructure' (Policy CT2).

Figure 10.2 Crowding on the London Underground network 2007(left), 2031(right)

Figure 10.3 Crowding on the London Overground and National Rail Network, 2007(left), 2031(right)

Figure 10.4 traffic delay in the AM peak hour (2008 - 2009)

Figure 10.5 traffic delay in the PM peak hour (2008 - 2009)

## Transport Capacity

### **Key Principle TRN1:**

Any development proposals should demonstrate by way of robust Transport Assessments that the cumulative impacts of development on the transport networks is acceptable.

10.13 This chapter sets out the transport impacts of, and interventions and further work required to support a development scenario that includes 5,560 homes and 12,165 jobs.

10.14 Two higher transport scenarios were considered in the first draft of the SPD:

- 8,286 homes and 24,050 jobs; and
- 10,647 homes and 31,895 jobs.

These scenarios were both discounted due to their impacts to the transport networks and not considered further in this draft. The first of these scenarios could not be supported given the increases in vehicle delay on the A4. The second scenario resulted in unacceptable impacts to both the highway and public transport networks.

### **Key Principle TRN2:**

Development should be supported by robust Transport Assessments that set out phase by phase what the cumulative impact of development will be and how it will be mitigated at each phase.

10.15 Any applications for development in the OA should demonstrate, by way of robust Transport Assessments, that phase by phase the impacts of development are properly mitigated and can be accommodated on the transport networks. Appropriate controls will need to be agreed to ensure development is not implemented until capacity improvements and other mitigations are provided.

## Walking and Cycling

### Walking

#### **Key Principle TRN3:**

All streets within the OA should be designed and built to adoptable standards and offered to the Highway Authority for adoption.

#### **Key Principle TRN4:**

All streets within the OA should be accessible to all with appropriate gradients where changes in level are experienced, generous footway widths and accessible crossing facilities. The streets should provide safe and direct north-south and east-west movement for pedestrians and cyclists and integrate well with the surrounding streets.

10.16 Development should provide a coherent network of streets that opens the OA up to pedestrians and cyclists, is accessible to all users and allows quicker access to the public transport network. By doing this Public Transport Accessibility Levels in the centre of the OA will be increased from level 2 (moderate) to 6a (excellent). The neighbourhoods surrounding the OA will also feel more connected with each other and to the new communities within the site itself. Appropriate controls will need to be agreed to ensure development is not implemented until capacity improvements and other mitigations are provided.

10.17 All new streets created within the OA should be built to adoptable standards and will be offered for adoption to the Local Highway Authorities. Adopting the streets would ensure that design, construction and future maintenance will be of the highest standards and it will secure public access in perpetuity.

10.18 A route for pedestrians and cyclists above the alignment of the West London Line could create an alternative route to Warwick Road, where footfall is already high. Improvements to connections to the north and south of the site at either end of the route should be investigated in order to create links with existing and planned pedestrian and cycle routes in the area. Opportunities for public open space in this location are considered in more detail in the Urban Form Strategy (Chapter 4).

#### **Key Principle TRN5:**

Development should provide a coherent pedestrian wayfinding strategy in and around the OA .

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10.19 A coherent wayfinding strategy will be required to encourage walking and cycling within and around the OA. This strategy will need to reflect Transport for London's Legible London standards and utilise all opportunities of providing navigational information to pedestrians, such as bus stops and the Mayor's Cycle Hire Scheme docking stations.

**Key Principle TRN6:**

New development should fund environmental improvements and deliver wider, clearer and higher quality footways on the existing streets surrounding the OA and contribute towards the A4 improvement scheme.

10.20 Development will add significantly to footfall in the area, as shown in Figure 10.6. This shows total pedestrian trips, including existing and forecast additional pedestrian movements within and adjacent to the OA. The distribution of pedestrian trips is based on existing movements in the area and identifies the proportion of new trips likely to be made to each of the stations.

Figure 10.6 Footfall on streets surrounding the OA in 2031, including development footfall

10.21 There is generally sufficient footway width to accommodate the footfall generated by development on the existing streets. However, the clear footway width (i.e. the footway space available for pedestrians once street furniture has been taken into account) will be insufficient in some locations, either because of narrow footways or excessive and poorly coordinated street furniture. In particular, clear footway widths will need to be increased on North End Road around West Kensington station, around the Earl's Court station entrance on Warwick Road and around West Brompton station on Old Brompton Road (see Figure 10.7). Rationalisation and removal of street furniture will help increase clear footway width in these locations.

10.22 The detailed design of the internal network of pedestrian routes within the OA should be attractive and convenient for pedestrians as these will need to be designed to relieve the existing footways as far as possible.

Figure 10.7 Existing locations with sub-standard footway widths on the streets

10.23 The streets surrounding the OA, including North End Road, Warwick Road, Lillie Road, Old Brompton Road, the A4 and Earl's Court Road all require improvements if they are to accommodate higher levels of pedestrian footfall. The development should therefore deliver significant environmental improvements to these streets including repaving and more consistent dropped kerbs. Given the additional footfall added to the A4 by development, contributions will be required towards the A4 improvement scheme, which is being developed by TfL and the boroughs. The treatment of the spaces around the stations will also need to be

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improved to provide more coherent interchange between transport modes as well as better pedestrian environments.

10.24 Environmental improvements to the Warwick Road entrance at Earl's Court station will also be essential and should include removal of the existing hoardings. The improvements will need to form part of a coherent urban design response that includes links into a new civic space and accommodates the necessary interchange improvements.

**Key Principle TRN7:**

New development should deliver new pedestrian crossings and improve existing crossings in order to meet the increase demand from development and significantly improve the pedestrian environment and access into and out of the OA.

10.25 The level of pedestrian footfall set out in Figure 10.6 will also have an impact on pedestrian crossings in the area. The crossing on Old Brompton Road has insufficient width to accommodate the predicted development footfall and will need to be widened. To help relieve the crossing at Warwick Road and reduce congestion within Earl's Court station, new development should refurbish and reopen to the public the existing pedestrian tunnel beneath Warwick Road to allow direct access to the Underground station. A new pedestrian crossing will be necessary on the A4 and should be incorporated into a new junction into the site. The existing crossings on the A4 at North End Road and Warwick Road would be improved by the introduction of straight ahead crossings instead of the staggered arrangements that currently exist. However, such changes, including a crossing at the new A4 junction, are likely to have an impact on traffic capacity and will need to be carefully reviewed to ensure an appropriate balance of users' needs is achieved.

Figure 10.8 Interaction between cyclists and pedestrians

Figure 10.9: Mayor's Cycle Hire Scheme at Soho Square

Figure 10.10 Streets surrounding the OA with poor public realm that would need to be resolved (2011)

## Cycling

10.26 If the development proposals are to have an acceptable impact on the surrounding road and public transport networks, cycling should form a key part of the travel choices made by those working and living in the site. Significant investment in cycling facilities, supported by strong Travel Plans, will be vital to achieving higher levels of cycling and are expected to be funded by the development.

10.27 The development is forecast to generate around 600 cycle trips in the peak hours. The creation of a new network of cycle friendly streets within the OA will mean that cycling will be safer and more attractive for all. It should be noted that as the local cycling environment is enhanced, cycling will become ever more attractive and

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therefore these forecasts should be regarded as the minimum that could be expected.

**Key Principle TRN8:**

New development should deliver improved onward connections for cyclists into the streets surrounding the OA.

10.28 One of the most significant improvements required to accommodate cycle trips is better east-west connectivity. All new streets within the OA should be attractive to cyclists and offer maximum permeability with excellent onward connections into existing streets. If road closures or one-way streets are proposed within the site these should allow for the passage of cyclists in both directions. Safe and convenient connections north, under the A4 to Warwick Road and south, under Lillie Road, will also need to be investigated. To the east of the site in particular there are several one-way streets that are designed to discourage vehicles from rat running but that also cause significant inconvenience, making cycling less attractive. In order to accommodate the increased demand from development any new development should identify cycle routes based on the likely origin and destination of trips through the area and fund appropriate improvements, such as allowing cycling in both directions in one-way streets and improvements to junctions and crossings, to make those routes as attractive and convenient as possible.

10.29 All new streets should be designed to ensure 20mph maximum speeds, which will improve their attractiveness for cyclists and pedestrians by making them safer and reducing traffic noise. More detail on this is set out in the Urban Form Strategy.

**Key Principle TRN9:**

New development should deliver increased levels of cycle parking to London Plan and Local Development Plan standards, particularly at key public transport interchanges, and the Mayor's Cycle Hire Scheme should be extended into the OA.

10.30 Secure and convenient cycle parking should be provided for residents and workers and sufficient showering and changing facilities should be provided in commercial buildings. Visitor cycle parking on the new streets should be plentiful and located close to areas of demand, such as major entrances to buildings, that benefit from natural surveillance. There is already insufficient cycle parking within the existing streets and at the three Underground stations to meet demand and development will increase this demand. Development should address this problem through additional parking within the OA boundary as well as through a thorough review of opportunities, and funding of new facilities, to increase existing parking levels in the area

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10.31 The Mayor's Cycle Hire Scheme already extends to the eastern edge of the OA and Phase Three of the Mayor's Cycle Hire Scheme will extend it west, beyond the OA. Docking stations should be provided within the OA with several new docking stations required to meet the likely demand. The cost will be borne by the development.

## Public Transport

### Rail services

#### Key Principle TRN10:

New development should deliver physical improvements to all three stations to accommodate the forecast increase in passenger numbers.

#### Key Principle TRN11:

Development in the OA should not result in excessive crowding or delay on the London Underground or National Rail and Overground networks, compared to predicted levels in 2031.

10.32 Development will add a significant number of additional trips to the rail networks. The figures below represent all development related trips starting or finishing in the OA by public transport, including buses, although the majority will be made by rail.

Table 10.1: Peak hour net additional public transport trips to and from the OA

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10.33 The capacity increases set out in paragraph 10.05 are such that this level of additional loading can be accommodated on the individual lines serving the site. However, due to significant growth in population and employment as well as the demands of development, crowding levels in and around the OA in 2031 are forecast to be at a similar level to today. Crowding on the Wimbledon branch of the District Line is likely to be even higher than it is today and this line will remain the most overcrowded in West London.

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10.34 There are a number of currently unfunded proposals that would, if delivered, provide transport benefits to the OA. In particular this includes the provision of longer trains on the London Overground and Southern Services along the West London Line and the proposed Chelsea Hackney Line, which would offer relief to the Wimbledon branch of the District Line. For robustness the Strategic Transport Strategy did not include any additional capacity from these proposals although the principle of each is supported due to the benefit that they would provide to the area.

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10.35 A static assessment of the impact of development on all three local stations in 2031 has identified that each would require a significant level of investment to be able to operate at a satisfactory level. All three stations would require an increase in gate line capacity, whilst both West Kensington and particularly West Brompton would require enlarged ticket halls, enhanced stairways and lift access. Detailed

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requirements for station improvements are set out below. All of these improvements would need to be funded by development and are subject to London Underground operational agreement.

### Earl's Court Station

#### **Key Principle TRN12:**

New development should provide capacity and environmental improvements to Earl's Court Station, including the reopening of the existing pedestrian tunnel beneath Warwick Road, as part of ensuring the station can accommodate the forecast increase in passenger numbers.

10.36 By 2031 passenger movements into and out of Earl's Court station in the AM and PM peaks will be at least 20% higher than existing movements (2009 figures). Development would add an additional 10% in both peaks.

10.37 The level of additional trips generated by development will put pressure on the existing Warwick Road entrance gate line, which will not be sufficient to cater for demand, and on the eastbound District Line platforms, which will experience an increase in flows along the platform to the Piccadilly Line. The refurbishment and reopening of the existing, but currently unused, pedestrian tunnel under Warwick Road would mitigate these impacts by providing a direct link from the OA to the Piccadilly Line avoiding both the eastbound District Line platforms and the Warwick Road station entrance. Alternative improvements to gate line capacity would otherwise have to be identified. The tunnel would need to contain a ticket gate line and will serve as an additional entrance to the station, reducing the burden of additional trips on the current Warwick Road ticket hall and gate line to such an extent that no additional capacity enhancement would be required at the existing gate line. It would also relieve pressure on the eastbound District Line platforms and the stairwells leading down to the Piccadilly Line escalators. There is adequate concourse, platform and staircase capacity to accommodate the predicted levels of demand. Given the listed status of Earl's Court station, changes should be undertaken sensitively and will be subject to Listed Building Consents.

#### **Key Principle TRN13:**

New development should deliver extra capacity at the gate lines, ticket halls and circulation space at West Brompton and West Kensington stations in order to accommodate the development related trips.

### West Kensington Station

10.38 At West Kensington background passenger growth for movements into and out of the station are anticipated to increase by 20-30% to the year 2031 in the AM and PM peaks. A similar scale increase is anticipated to be generated by

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development. West Kensington station currently has four ticket gates. The predicted background and development growth in demand to 2031 would make five gates necessary and require additional space within the concourse. In order to spread the burden of additional passengers on the existing gate line and concourse, as well as to open up the station to the centre of the OA, a new entrance to the station should be provided at its eastern end. This would remove the requirement for additional gates at the current entrance and better balance pedestrian movement within the station as well as providing a better link into the OA. All staircases and platforms are sufficiently wide to accommodate increased demand.

### West Brompton Station

10.39 By 2031, without development, background passenger growth for movements into and out of West Brompton station are forecast to increase by 50% in the AM peak and 90% in the PM peak. Development will add an additional 30% in both peaks. To accommodate background growth the number of gates at the station would need to increase from the current three to six. Seven would be required to accommodate development.

10.40 There is insufficient concourse space within the current station arrangement for the volume of passengers forecast, even without development to 2031. Any new development would have to look at a comprehensive reworking of the station to provide more concourse capacity. Options for this station, as well as West Kensington, will need to be assessed to identify how additional space could be released.

10.41 All platforms can adequately accommodate the extra passenger demand forecast above. The existing staircases at the station do not meet London Underground's minimum standards. As West Brompton station is listed any works must be undertaken sensitively and will be subject to Listed Building Consents.

10.42 West Kensington station is locally listed. The physical constraints of both West Kensington and West Brompton stations, especially considering their heritage designations, make these necessary capacity enhancements challenging and any new development should be able to demonstrate clearly how increased capacity will be achieved.

**Deleted:** At West Brompton much of the Underground station, including the staircases, is listed and changes should be undertaken sensitively.¶

**Deleted:** The physical constraints of both West Kensington and West Brompton stations, as well as the heritage considerations at West Brompton, make these necessary capacity enhancements challenging and any new development should be able to demonstrate clearly how increased capacity will be achieved.

#### **Key Principle TRN14:**

Step-free access should be provided at West Brompton and West Kensington stations and any new entrance at Earl's Court Station.

10.43 To ensure that the OA is developed in a manner that is accessible to all as well as to cater for the significant additional passengers generated by development in

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the OA, it is a requirement that step-free access is provided to both platforms at West Kensington station and to the southbound District Line platform at West Brompton.

10.44 All new station entrances, such as at West Kensington, should be step-free. At Earl's Court station the reopened pedestrian tunnel should be step free at least to the District Line platforms, by providing lifts at the new entrance and extending the current District Line lifts down to the level of the tunnel.

**Key Principle TRN15:**

New development should fund platform lengthening to accommodate eight car trains on the West London Line platforms at West Brompton, should investigate creating an additional station entrance and fund its implementation if found feasible following the investigation.

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10.45 All London Overground and Southern trains consist of four car trains. Network Rail's London and South East Rail Utilisation Strategy seeks to extend platforms on the West London Line so that they can accommodate eight car trains operated by Southern and six car London Overground trains. This would increase capacity by around 70% and would result in reduced crowding levels on the West London Line which in 2031 with development are otherwise forecast to exceed acceptable levels. Such an increase in capacity would mitigate the impact of development and reduce crowding levels. Though this scheme is currently unfunded, its delivery is a priority for TfL and Network Rail.

10.46 This improvement is particularly necessary given the very high levels of crowding experienced on the West London Line and the additional passengers that the development will introduce to the network. The increased line capacity will also increase the number of passengers accessing the station by at least 5% in both peaks. This would further impact upon the station infrastructure at West Brompton and would require at least one additional gate, bringing the total up to eight.

10.47 In addition to extending the platforms at West Brompton, creating an additional access to the station would help to reduce the pressure on the ticket hall whilst improving access to the Seagrave Road area of the OA. Development of the OA should provide platform extensions at West Brompton station and should investigate creating an additional station entrance and fund its implementation if found feasible following the investigation.

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**Key Principle TRN16:**

New development should deliver significantly enhanced interchange facilities at all three stations.

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10.48 Interchange facilities need to be improved at all three stations. Currently there are cluttered footways, limited and inconsistent way finding, poor access to bus services at West Brompton and Earl's Court, limited cycle parking and in general a poor pedestrian environment that is dominated by vehicle movements.

10.49 The general improvements to the public realm identified as necessary in paragraphs 10.22 to 10.24 will improve the quality of the environment around all three stations. Rationalisation of street furniture will be essential and cycle parking, taxi ranks and bus stops may need to be relocated to the adjoining edges of the site as part of a complete redesign of the spaces so as to provide significantly more space for pedestrian movement without having an adverse impact on access for buses and taxis. Improved crossings and other ways of rebalancing pedestrian needs with those of vehicles will need to be investigated including, for example, the provision of single surface treatments. The design of these will need to be accessible for all and will need to incorporate improved way finding.

### **Bus Services**

#### **Key Principle TRN17:**

Additional bus services, routes and stops funded by development will be necessary within and around the OA to accommodate new development trips.

10.50 Between now and 2031 local bus demand will change and bus services will need to reflect demand. Development in the OA will need to contribute to additional bus services to ensure that the additional demand generated can be supported on the bus network during peak hours. The effect of highway congestion on bus journey time reliability will need to be considered to ensure that services remain attractive to passengers.

10.51 There are a number of locations that have poor bus connectivity to Earl's Court. These include the King's Road, Battersea and Vauxhall, Richmond and south west London. Routes that connect the south of RBKC to the north are currently very limited and new services should help to bridge this gap. Any new routes should help to fill these and other gaps.

10.52 There are benefits of both the provision of new and the extension of existing routes to fill the gaps in the network. They will help minimise local capacity problems created by the development as they could be run through the OA, along a north-south route, which would provide a better range of services for future residents. This is especially important given the poor connections to southbound bus services caused by the splitting of routes on the Earl's Court One Way System. Bus services

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should be able to travel north-south and east-west but there should be no new connection onto Warwick Road as this link is already well served and impacts on public realm. Any new links here could have significant impacts on the public realm. All changes to bus services as a result of the development will require full mitigation for five years to pay for subsidy of new or additional services, until those services become revenue neutral.

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10.53 Developers will be expected to carry out audits of all the bus stops and associated bus facilities in the area, as part of their Transport Assessment. Applicants will be expected to upgrade these where deficiencies exist to ensure the facilities are fully accessible..

10.54 All existing bus stands within the OA should be retained or re-provided on site, and additional space may be required depending on the detailed analysis of bus services undertaken as part of the Transport Assessment submitted in support of development.

### Other Services

#### Key Principle TRN18:

Development should include taxi rank and coach parking facilities within the OA

10.55 There are currently no TfL Public Carriage Office appointed Taxi Ranks within the OA or its hinterland. Taxi rank and drop off facilities including for community transport schemes, will need to be provided to support demand from the OA.

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10.56 There is significant pressure on coach parking facilities in west London. Development should not add to this pressure and therefore sufficient coach parking and drop off facilities will be required within the OA, close to high coach trip generating uses, to meet development demand.

## Road network, car parking and freight

### Road Network

#### **Key Principle TRN19:**

Development traffic cannot be accommodated on the existing road network without significant capacity improvements, which should be clearly identified in development proposals along with appropriate funding mechanisms to ensure improvements are delivered before development demand is introduced.

10.57 Even without development in the OA, traffic levels in the local area are forecast to increase significantly from 2009 to 2031. This is due to both the recent removal of the Western Extension of the Congestion Charging Zone as well as forecast growth in population and employment. The strategic nature of the A4 means it draws significant traffic volumes through the area and is particularly affected by background increases in traffic volumes. In this chapter the '2031 base' refers to forecast traffic levels in 2031 without development. The Strategic Transport Study has assessed the impact of this growth on the road network as well as the additional impacts of OA development. The full extent of the road network that was considered in the local highway modelling is shown in Figure 10.11.

10.58 The strategic transport study estimates that development would increase traffic levels within the OA by around 3% in the AM Peak and 2% in the PM peak. For the local highway network to operate at an acceptable level, this level of growth would require additional highway capacity improvements and modal shift to walking, cycling or public transport. In particular journey time reliability on the highway network should not be unacceptably impacted by development in the OA.

Figure 10.11: The extent of the road network modelled in the transport study

10.59 Development proposals should seek first to mitigate any potentially negative impacts on the highway network by reducing the level of traffic generated rather than through physical interventions to manage traffic. This is considered further in paragraph 10.72. However, in order to ensure a robust assessment was undertaken, the Strategic Transport Study also assessed a number of highway capacity interventions to establish whether they could enable OA development to take place with no reductions in travel demand assumed. The capacity interventions tested included:

- A new north-south route through the site connecting to the A4 and Lillie Road. This would provide access to, and additional road capacity through, the development as well as helping to relieve key routes such as Warwick Road, North End Road, Earl's Court Road and the junctions along the A4 and Lillie

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- Road. A link, or links, such as this are essential to allow development to take place.
- Significant changes to traffic signal phasing to give more 'green light' time to traffic on the roads surrounding the A4. This creates more capacity on the surrounding roads and is possible because the A4 is currently given significant priority.
  - Altering the North End Road / Lillie Road junction from a double mini roundabout to a signalised junction, including banning vehicle movements from North End Road into Lillie Road and vice versa. Any street network within the OA would have to provide alternative turning movements. . This is intended to reduce demand on the junction, creating more capacity for those vehicles still using it.
  - Providing a new westbound left turn vehicle movement onto the A4 at the A4/ North End Road junction to run at the same time as the existing right turn eastbound vehicle movement in order to provide additional traffic capacity.
  - Alterations to the signal timings at the A4 / Warwick Road junction to accommodate pedestrian crossings in each signal cycle and to remove periods where there are no green signals, which means traffic is given more time to move through the junction.
  - Increasing the length of green time at the traffic signals at Old Brompton Road's junctions with Finborough Road and Earl's Court Road, to allow more traffic to pass through the junctions.

10.60 The impact of the capacity improvements set out above is to improve overall network performance, allowing around 15% more traffic to be accommodated. Even with the forecast growth and additional development traffic, average journey times across the local network are comparable to the 2009 base and are significantly improved in comparison to the 2031 base with no capacity improvements.

10.61 However, despite the overall road network performance benefits and the increased capacity primarily brought about by the new link road, this does create some significant variations in performance across the local network. The north-south routes generally experience improved performance and the east-west routes experience decreased performance.

10.62 North End Road, Warwick Road and Earl's Court Road experience reductions in journey time and delay due to the extra road capacity provided by the north-south route and some re-phasing of traffic signal timings. Traffic on these north-south routes moves faster and more smoothly, despite overall increases in traffic flow as some demand flows through the OA. This is demonstrated in Figures 10.12 to 10.15. The figures show a pattern of increasing journey time from the 2009 base to the 2031

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base and then a reduction in journey times once the interventions are added. These occur despite the addition of development traffic.

Figure 10.12 Earl's Court Road/Warwick Road AM Peak Hour Average Journey Times (measured in seconds)

Figure 10.13: North End Road AM Peak Hour Average Journey Times (measured in seconds)

Figure 10.14: Earls Court Road/Warwick Road PM Peak Hour Average Journey Times (measured in seconds)

Figure 10.15: North End Road PM Peak Hour Average Journey Times (measured in seconds)

**Key Principle TRN20:**

Development proposals should include deliverable and funded road network improvements that reduce delays on the A4 to 2012 levels, while not having unacceptable impacts on the surrounding road network.

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10.63 In comparison to the impact on the north-south routes, it is clear that development, even with the highway capacity improvements tested in paragraph 10.60, would result in a deterioration of performance in terms of journey time, vehicle delay and queue lengths on the main east-west routes through the area. On the strategically important A4, journey times increase in the AM peak by around 40 seconds westbound and 60 seconds eastbound in comparison to the 2009 base. Eastbound traffic also experiences worsened journey times in comparison to the 2031 base. In the PM peak the overall increases in traffic volume are greater and the journey times therefore increase more significantly. Both directions also see a worsening in comparison to the 2031 base. These delays are due not only to the rebalancing of traffic priority at the junctions as explained above, but also to the introduction of a new junction on the A4.

Figure 10.16: A4 Corridor AM Peak Hour Average Journey Times (measured in seconds)

Figure 10.17: Old Brompton AM Peak Hour Average Journey Times (measured in seconds)

Figure 10.18: A4 Corridor PM Peak Hour Average Journey Times (measured in seconds)

Figure 10.19: Old Brompton PM Peak Hour Average Journey Times (measured in seconds)

10.64 On Old Brompton Road journey times in the AM peak remain broadly unchanged in comparison to the 2031 base, but are increased from the 2009 base. In the PM peak the delays are greater at around 100 seconds eastbound and 210 seconds westbound in comparison to the 2009 base. The increase from the 2031 base is more modest, though still significant, at around 90 seconds in both directions. The greater impact in the PM is due to the larger overall increase in background traffic volume between 2009 and 2031.

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10.65 The information outlined above demonstrates that with the interventions tested, development can occur in the OA whilst not impacting on broader network performance, but more locally it would have negative impacts on the A4 and Old Brompton Road. Given that the A4 is a strategic trunk road and part of the Transport for London Road Network (TLRN), such an impact is not acceptable and any development proposals for the OA would need to consider alternative or additional measures to maintain the A4's performance and minimise the impact on Old Brompton Road and would need to demonstrate that this could be achieved through a wide range of mitigation measures within their Transport Assessment. This could include measures such as physical junction improvements, further changes to traffic signal phasing, travel demand management measures and a comprehensive Travel Plan that will promote a shift in behaviour towards sustainable travel choices. These will all need to be secured and funded by the developer. A detailed assessment of the highway network will need to be undertaken as part of any Transport Assessment.

10.66 Improving the capacity of the road network to allow it to accommodate development traffic is essential and some methods of doing that have been set out above after being tested in the Strategic Transport Study. However that assessment did not consider the impact of additional traffic volumes on air quality, residential amenity or on levels of queuing on any new north-south routes within the site. Such impacts are likely to have a negative impact on the environment within and around the OA, will compromise the ease of movement through the site and will create a less pleasant environment for walking and cycling. Given the dual concerns of increased delay on the A4 and the general environmental implications of increased traffic volumes, any development proposals will need to be supported by a comprehensive package of measures to reduce travel demand. This will include parking restraint as set out in paragraph 10.74.

**Key Principle TRN21:**

Development should not worsen traffic conditions to unacceptable levels on existing streets and a review of local traffic management arrangements should be undertaken to address this and provide funded mitigations where necessary.

10.67 Development has the potential to worsen traffic conditions on existing streets. A review of local traffic management arrangements will be necessary and this should include a funded package of mitigations where necessary.

**The Earl's Court One Way System**

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**Key Principle TRN22:**

New development should investigate improvements to the Earl's Court One Way System, including to the pedestrian environment, minimise the impact on Old Brompton Road and should fund a package of measures as identified in the investigation.

10.68 This SPD does not seek to achieve significant reductions in traffic on the Earl's Court One Way System via new north-south routes through the OA. An assessment of the potential for using a new north-south route within the site to relieve the Earl's Court One Way System of through traffic, which could allow for two-way operation to be introduced, was undertaken. This found that a north-south route could reduce traffic on Warwick Road by up to 18% and on Earl's Court Road by up to 10%. To achieve this, traffic is diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. Furthermore the level of traffic reduction achieved on the Earl's Court One Way System would not be sufficient to introduce two-way operation. This SPD does not therefore seek to achieve significant reductions in traffic on the Earl's Court One Way System via the north-south route through the redevelopment of the OA. However, the alignment of any north-south routes should have regard to RBKC's long term ambition to return Earl's Court One Way System to two way operation.

10.69 RBKC will continue to work with TfL to improve the Earl's Court One Way System. This SPD requires significant improvements to the pedestrian environment in and around the Earl's Court One Way System as set out in paragraph 10.23.

**Key Principle TRN23:**

All junctions from the OA on to the existing road network and road links across the OA should be assessed to ensure they have no unacceptable impacts on the existing road network in terms of vehicle capacity, road safety and urban design.

10.70 New north-south connections through the OA are essential to the development of the OA by providing access to the heart of the site, additional road capacity and relief to existing parallel roads. The connection of a route onto the A4 and connections on Lillie Road should be configured so that the impact on the existing highways is minimised. The exact layout and function of the routes and junctions should be agreed through the planning application process and must be supported by Road Safety Audits.

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10.71 An east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, though not for vehicles. A vehicle route from Star Road has been assessed and does not create additional congestion on North End Road. A vehicle access at Warwick Road has the potential to create conflict with pedestrians using Earl's Court station and to compromise the quality of the proposed new public space. If such an access is included in development proposals the road safety and urban design impacts would need to be carefully assessed in a detailed Transport Assessment and it would need to be demonstrated that vehicle access is acceptable.

## Car Parking

### Key Principle TRN24:

Car parking levels should be minimised in order to restrain car trips, except for parking for car club vehicles, which are encouraged in order to provide an alternative to private car ownership and use.

10.72 As set out in paragraph 10.59 development proposals should seek first to mitigate any potentially negative impacts on the highway network by reducing the level of traffic generated rather than through physical interventions to manage traffic. Measures to reduce the volume of car use such as car-free development, the use of car clubs, excellent provision for cyclists and other travel demand management measures will be vital. Clear incentives will need to work with parking restraint in commercial Travel Plans. These will need to work alongside physical improvements to the network.

10.73 In general new off-street parking should be minimised and the overall parking requirements for the OA should be considered in the context of total parking, including on- and off-street provision. General public car parks will not be acceptable. In line with the Mayoral priority and borough policies to promote the use of electric vehicles, provision should be made for electric car charging points, both within new buildings and on-street. Some dedicated motorcycle parking should be provided. Blue badge parking for residents and visitors should be provided in line with the London Plan and local guidance.

10.74 One way of minimising car use is to ensure limited car parking is provided. Given the large scale of the development even relatively constrained parking levels of one car parking space for every 2000m<sup>2</sup> of commercial floorspace and 0.4 spaces per residential unit means 1500 spaces. This level of parking was assumed in the Strategic Transport Study, which as outlined in paragraph 10.65

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resulted in some unacceptable impacts on the highway network. In addition further traffic would reduce air quality and general residential amenity. Development in the OA should therefore provide parking at well below 0.4 space per residential unit. Car free development is encouraged with the exception of blue badge and car club parking.

**Key Principle TRN25:**

Development proposals should be supported by an on-street parking strategy.

10.75 The likely demand for on-street visitor parking generated by the development has been assessed and is in the order of 200 vehicles. This parking demand is largely from workers within the new commercial uses on site. In order to minimise this, and minimise the impact of any additional parking demand that remains, development proposals will need to be accompanied by a review of existing controlled parking zones as part of an on-street parking strategy that is compatible with the general objective of reducing traffic. This strategy would consider amendments to existing controlled parking zones and the need for new zones in LBHF. Development would need to fund any necessary alterations.

10.75 No new residential units will have eligibility for parking permits issued by RBKC or for existing controlled parking zones in LBHF.

**Freight**

**Key Principle TRN26:**

Development proposals should be supported by substantial measures to minimise the impact of freight, including during the construction period.

10.77 An onsite local delivery centre should be investigated as part of the new development. The centre would act as a central collection point for deliveries into the OA that could then be distributed to the local final delivery point by electric vehicle, bicycle or walking. It could also act as a holding point for deliveries for local businesses and residents who are not at home to receive the delivery. This has been proven elsewhere to reduce deliveries by up to 70%, with resulting savings in emissions and congestion. Such a centre should be able to receive 24 hour deliveries, thereby removing freight vehicles from the highways in peak periods.

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10.78 Delivery and Servicing Plans and Construction Logistics Plans should be included with any planning applications.

10.79 The provision of a freight rail transfer facility for construction materials and the removal of spoil should be investigated as part of the development proposals. If this is not proposed by development the applicant will have to demonstrate why such a facility is not feasible. The facility would reduce the impact of heavy vehicles on the surrounding area and reduce the environmental impact of construction.

## **Energy Strategy**

### **Overview**

#### **Key Objectives**

All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and

All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

10.1 This chapter sets out what improvements to the transport network will be necessary to support development. These include improvements to the public realm to encourage walking, improved cycle facilities and increased capacity on the public transport and road networks. This chapter is informed by a Strategic Transport Study, a review of which can be found on the authorities' websites.

11.1 This chapter sets out requirements to ensure that new development in the OA achieves high environmental standards by reducing carbon dioxide emissions and implementing an energy strategy, in accordance with the energy hierarchy, set out in the Mayor's London Plan (2011), of:

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1. Be lean (use less energy);
2. Be clean (supply energy efficiently); and
3. Be green (use renewable energy).

11.2 The final section addresses the requirements of the energy assessment that must accompany any application.

### **Context**

11.3 The Climate Change Act 2008 requires a reduction in carbon dioxide emissions of at least 26% by 2020 and 60% by 2050, against a 1990 baseline. The Government has recently increased this target to 80% by 2050, which will require far more stringent measures to reduce carbon dioxide emissions.

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11.4 The draft National Planning Policy Framework states that the planning system should aim to "secure, consistent with the Government's published objectives, radical

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*reductions in greenhouse gas emissions, through the appropriate location and layout of new development, and active support for energy efficiency improvements to existing buildings and the delivery of renewable and low-carbon energy infrastructure”.*

11.5 GLA monitoring data shows that in 2008, 43% of carbon dioxide emissions in London were from the workplace, 36% from homes and 21% from transport. Measures to reduce emissions in London are outlined in the Mayor of London's Climate Change Mitigation and Energy Strategy (September 2011). Reducing emissions from workplaces and homes can make a significant reduction in carbon emissions and contribute to meeting London's and the UK's climate mitigation targets.

## **Policy Context**

### **11.6 The Mayor's London Plan (2011):**

'Climate Change Mitigation' (Policy 5.1);  
'Minimising Carbon Dioxide Emissions' (Policy 5.2);  
'Sustainable Design and Construction' (Policy 5.3);  
'Decentralised Energy Networks' (Policy 5.5),;  
'Decentralised Energy in Development Proposals' (Policy 5.6);  
'Renewable Energy' (Policy 5.7), and  
'Overheating and Cooling' (Policy 5.8).

### **11.7 LBHF's Core Strategy (2011):**

'Strategic Site and Housing Regeneration Area – FRA 1'; and  
'Reduce Carbon Emissions and Resource Use and adapt to Climate Change Impacts' (Policy CC1).

### **11.8 RBKC's Core Strategy (2010):**

'Earl's Court' (Policy CP10 and associated Vision);  
'Earl's Court Exhibition Centre Strategic Site' (Policy CA7); and  
'Climate Change' (Policy CE1).

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## Using Less Energy

### **Key Principle ENE1:**

Each phase of development must meet the carbon reduction targets set out in the Mayor's London Plan (2011), with all residential development from 2016 being zero carbon and non-residential development from 2019 being zero carbon.

11.9 There are numerous ways that energy demand from buildings can be reduced (and therefore also reduce carbon dioxide emissions), such as improving insulation, using sustainable building materials, maximising solar gain, natural ventilation, reducing overheating and using energy efficient appliances. The choice of measures depends on many factors, including available technology. Development should not rely on mechanical heating or cooling, such as air conditioning. This document does not specify measures to improve energy efficiency, but requires all new development in the OA to reduce carbon dioxide emissions in accordance with the Mayor's London Plan (2011) targets, as set out in Table 11.1.

Table 11.1: Mayor of London's carbon reduction targets for new residential buildings and non-domestic buildings

11.10 In addition to the Mayor's London Plan (2011) targets, new development in RBKC will be expected to meet the relevant Code for Sustainable Homes or BREEAM standards, as set out in Core Strategy Policy CE1, at the time that detailed planning permission is sought.



## Supplying Energy Efficiently

### **Key Principle ENE2:**

Redevelopment of the OA must deliver decentralised energy (including associated district heat network) with associated energy centre(s) and infrastructure. The size (capacity), number and location of energy centre(s) must meet the energy needs of each phase of the development, with the potential to meet the needs of the surrounding area.

11.11 Supplying energy efficiently is about reducing reliance on the National Grid and requiring energy to be produced as close to demand as possible. Decentralised energy (DE) means the generation of energy close to the point of demand. This approach enables higher fuel conversion efficiencies and lower electricity distribution losses, particularly losses during the transportation of energy through the National Grid. It also allows heat released during the power generation process to be captured, distributed and used locally, often via a district heating network. District heating networks are fundamental to ensuring these efficiencies are achieved, and will enable low-carbon heat to be distributed and used for space heating and hot water in residential and non-residential buildings in the OA and beyond.

11.12 The proposed scale of development, high heat demand, proposed mix of land uses and opportunity for laying pipe infrastructure in an integrated manner means development in the OA presents an ideal opportunity to establish DE and associated district heat network. The DE and associated district heat network will not only benefit the OA, but could be extended or connected into DE systems nearby to benefit the surrounding area.

11.13 The integration of DE in the OA is supported by a site specific Energy Study (2011) and LBHF's and RBKC's borough-wide heat mapping studies.

11.14 Redevelopment of the OA will need to deliver DE and associated district heat network, which must be designed and implemented in accordance with the following criteria:

- a range of fuel types need to be assessed and the reasons for selecting or discounting certain fuel types, including energy from waste (see below), need to be provided;
- heat and energy will need to be delivered through an Energy Services Company or Multiple Utility Service Company or similar, and dialogue with potential providers needs to commence at an early stage;
- DE and associated district heat network must be available to supply all buildings on occupation, which may result in one or more energy centres as part of the development or the need for temporary plant;

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- the energy centre(s) must be sufficient in size (capacity) and located centrally to deliver energy to meet the needs of each phase (if several energy centres are provided) or the entire development (if one energy centre is provided) and the surrounding area in the future;
- pipe infrastructure should be installed in an integrated manner with other service infrastructure and delivered on a phased basis;
- DE provision and the supporting infrastructure must be future proofed to ensure that the network continues to support a low carbon future;
- pipe infrastructure must comply with industry standard specifications to facilitate future interconnection of other buildings and/or networks;
- the location of energy centres must not impact on the residential amenity of new and existing residents, especially considering impacts such as noise, vibration and air pollution; and
- and
- the type of fuel selected for the DE and associated district heat network should not have unacceptable impacts on air quality and, where possible, renewable fuel sources should be prioritised.

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## Renewable Energy

### **Key Principle ENE3:**

On-site renewable energy will be required to meet any shortfall in achieving the carbon reduction targets. The suitability of renewable energy measures will be assessed having regard to their viability, location, whole life' carbon emissions and impacts such as noise, air quality, visual appearance and biodiversity.

11.15 All potential renewable technologies, such as photovoltaic panels, solar thermal, wind, ground and air source heat pumps and biomass fuelled boilers should be assessed for their feasibility in terms of energy generation capacity, 'payback', suitability (building, location and compatibility with DE), whole life' carbon emissions and likely impacts such as noise, air quality and visual appearance. The Government's Feed-in-Tariff and Renewable Heat Incentive provide incentives for renewable energy systems in new developments, which further improve viability by reducing the payback period. The possibility of generating energy from waste using advanced technologies such as anaerobic digestion should also be explored in accordance with RBKC's Core Strategy (2010) Policy CA7g and CE3b as this has the potential to reduce carbon dioxide emissions and provide an integrated waste management solution.

## Energy Assessments

### **Key Principle ENE4:**

Energy assessments must be submitted with all major planning applications and demonstrate how the targets above are to be met. Energy assessments must also demonstrate the reasons for selecting and discounting certain fuel options and renewable energy technologies.

11.16 The Mayor's London Plan (2011) Policy 5.2C requires "major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy". The energy assessment must show how the energy hierarchy will be implemented to meet the required carbon dioxide emission targets, taking into account the relevant Building Regulations at the time of the planning application. Energy Assessments will need to cover energy demand and carbon dioxide emissions not covered by the Regulations, with the aim of reducing carbon dioxide emissions at each stage of the hierarchy. Energy assessments must also provide detailed information on delivering decentralised energy and renewable energy systems, including all necessary infrastructure (energy centres, heat networks etc). They should also include the relevant Code for Sustainable Homes or BREEAM environmental assessments. Energy assessments must also demonstrate the reasons for selecting and discounting certain fuel options and renewable energy technologies.

11.17 It is expected that DE and the associated district heat network will be a core component in any energy strategy for the OA. The overall reductions in carbon and other emissions that can be achieved will be greater if a renewable fuel source is used. However the use of biomass fuels could increase local emissions of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>), potentially impacting on air quality. The potential emissions from any DE system will need to be assessed as part of an energy assessment submitted with any planning application, and will need to show how any negative impacts will be mitigated.

11.18 Energy Assessments will need to set out how the carbon reduction targets will be met within the OA. If the target for achieving zero carbon by 2016 cannot be met on-site, any shortfall will need to be met through 'Allowable Solutions' or financial contributions. Allowable Solutions are a project or scheme which will deliver verifiable carbon savings to meet required on-site targets to achieve zero carbon. However, Allowable Solutions cannot include measures already proposed to achieve the required carbon reduction targets, otherwise known as Carbon Compliance, as this will result in double counting.

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## Environmental Strategy

### Overview

#### Key Objectives

Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land:

Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;

Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;

Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and

Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

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12.1 The Government's recently published draft National Planning Policy Statement (July 2011) seeks to "use the planning system to .... use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy". Ensuring that development mitigates and adapts to the impacts of climate change is therefore central to this Environmental Strategy. Climate change mitigation by reducing carbon dioxide emissions is considered in the Energy Strategy. Climate change adaptation through resilient landscape and effective water management is considered below.

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12.2 This chapter therefore sets out requirements to ensure that development in the OA addresses any impact on the environment, including the consideration of construction and demolition, water management, waste, ecology and air and noise/vibration pollution.

Figure 12.1: View looking south, along the railway line from EC2

### Context

12.3 Given the size and shape of the OA, together with the nature of existing buildings and railway infrastructure, demolition, excavation and construction are likely to be phased over a 20 year period. The impact of these activities, together with

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associated transport, on existing and new residents will have to be mitigated. These impacts might include:

- Construction traffic, including noise, vibration, emissions, loss of amenity, highway safety, congestion, parking and pedestrian safety;
- Light spill;
- Damage to neighbouring structures, especially heritage and archaeological assets;
- Ground movement;
- Disturbance of unexploded ordnance;
- Creation and exposure of contaminated land leading to pollution of land, air and water;
- Generation of waste;
- Dust and other emissions affecting air quality;
- Energy consumption;
- Noise and vibration; and
- Impacts on ecology.

12.4 Measures to control impacts from noise and vibration, air quality, land contamination, ecology and biodiversity and water conservation are also considered in the relevant sections of this Environmental Strategy. Mitigating the impact of transport, including the movement of construction waste, is also considered in the Transport Strategy.

## Policy Context

### 12.5 The Mayor's London Plan (2011):

- 'Construction, Excavation and Demolition Waste' (Policy 5.18); and
- 'Sustainable Design and Construction' (Policy 5.3)
- 'Aggregates' (Policy 5.20)

### 12.6 LBHF's Core Strategy (2011):

- 'Waste Management' (Policy CC3); and
- 'Protecting and Enhancing Environmental Quality' (Policy CC4).

### 12.7 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Infrastructure Delivery and Planning Obligations' (Policy C1);
- 'Waste' (Policy CE3);
- 'Air Quality' (Policy CE5); and
- 'Noise and Vibration' (Policy CE6).

12.8 Many of the impacts from demolition, excavation and construction (including air quality, noise, vibration, dust, land contamination and asbestos) are also controlled through other legislation, standards and guidance, such as:

- The control of dust and emissions from construction and demolition; Best Practice Guidance (Mayor of London and London Councils 2006);
- The Construction (Design and Management) Regulations 2007;
- The Control of Asbestos Regulations (2006);
- BS5228: Control of Noise and Vibration on Construction and Open Sites;
- The Site Waste Management Plans Regulation (2008);
- The Definition of Waste: Development Industry Code of Practice, version 2 (CL:AIRE, 2011);
- Control of Pollution Act 1974; and
- Environmental Protection Act 1990.

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## Demolition, Excavation and Construction Impacts

### Mitigating Impacts from Demolition, Excavation and Construction

#### Key Principle ENV1:

Demolition and excavation waste, including contaminated waste, should be treated, recycled and reused on-site as much as possible. Where this is not possible, this waste, together with construction materials, transported in a sustainable manner, where rail is the preferred transportation method, and disposed of in an approved manner.

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12.9 The remediation, recycling and reuse of contaminated demolition and excavation waste will need to meet the highest standards of environmental sustainability. Demolition and excavation waste should be remediated, recycled and reused on site. Any on-site demolition, excavation or construction plant must minimise any impacts from noise, vibration, dust and emissions on existing and new residents. An assessment of the environmental impacts of remediation works must be undertaken to determine the most appropriate method.

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12.10 Any remediation must be in accordance with the seven stage approach outlined in the Land Contamination Strategy, set out under Key Principle ENV14. A 'soil hospital' where soil can be remediated for re-use on-site should be established in the OA. Areas should also be designated for storing other recycled materials for re-use on-site.

12.11 Redevelopment of the OA has the potential to generate many thousands of vehicle movements over a 20 year construction period, especially considering the volume of demolition and excavation waste and construction materials. These vehicle movements are likely to put pressure on the existing traffic network around the OA. Where remediation, recycling and re-use of materials on-site is not feasible, materials should be transported using the most sustainable method. The West London Line runs along the middle of the OA under Earl's Court 2 and is well located to facilitate the transportation of demolition waste and construction materials by rail. In accordance with LBHF Core Strategy Policy CC3 and RBKC Core Strategy Policy CE3d, development proposals should make use of the rail and waterway network for the transportation of construction waste and other waste. The transportation of contaminated materials must also be considered in any construction management plans or site waste management plans produced for the OA.



**Key Principle ENV2:**

Construction, demolition and excavation logistics plans must be prepared for every phase of construction and demolition. Access points into the site must be assessed in terms of highway safety, impact on air quality, noise and vibration and also impacts on the new and existing population.

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12.12 Given the size of the OA and phased approach to construction, it is likely that several vehicle access points will be required during the demolition, excavation and construction period. The number of vehicle access and exit points should be minimised and where required, these should be located where they have the least impact on the traffic network; vehicle, cycle and pedestrian safety; and existing amenity within and surrounding the OA.

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12.13 Detailed construction, excavation and demolition logistics plans must be submitted to the relevant Local Authority for every phase of development. These will form part of wider construction, excavation and demolition management plans. Construction, excavation and demolition logistics plans must deal with all aspects of construction and demolition vehicle management, including demolition transportation arrangements, delivery schedules, delivery bookings, routing of vehicles and delivery and turning facilities. Swept paths and tracking diagrams will also need to be included in the plans. Site access points in predominantly residential areas must be avoided, unless there is no other reasonable alternative in which case any impact on the residential amenity must be minimised. Queuing of construction vehicles on the highway network will not be permitted.

**Key Principle ENV3:**

Planning conditions will be used to require Construction Environmental Management Plans (CEMPs) before any demolition, excavation and construction on each phase of development. Developers will need to keep the new and existing population informed of the progress of the demolition and construction and information on all environmental impacts.

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12.14 The OA is surrounded by a number of existing noise and air pollution sensitive land uses, including a large number of homes, educational facilities, health facilities, community facilities, shopping and leisure uses. The Council will therefore control the impacts of these at source by requiring CEMPs before any excavation, demolition and construction occurs at each phase.

12.15 The CEMPs must include (although not be restricted to):

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- An application for Prior Consent for the Works (Section 61 of the Control of Pollution Act 1974) prepared in accordance with BS5228;
- Information on the works and the methods by which they are to be carried out;
- The steps proposed to minimise noise resulting from the works;
- The type of plant to be used and its noise characteristics;
- A programme and sequence of works indicating the predicted noise and vibration levels for each activity at specified noise sensitive sites for each phase of the works;
- Where work phases overlap the cumulative noise and vibration impacts shall be predicted;
- Noise monitoring proposals and methodology;
- Measures to inform the existing population on the progress of works and predicted noise levels over a period of time, including site notice boards and weekly resident liaison meetings;
- Traffic and construction logistics, including measures to reduce vehicle movements;
- Safety for highway users, cyclists and pedestrians;
- Minimising lighting and light spill;
- Protection of heritage assets;
- Procedures for dealing with uncovered archaeological sites;
- Site remediation and procedures for dealing with contaminated material;
- Procedures for dealing with unexploded ordnance;
- Measures for the protection of water resources and preventing contaminated runoff;
- Demolition and construction waste management procedures;
- Measures to prevent and control dust and other emissions to air;
- Energy conservation;
- Measures to protection ecological resources;
- Approaches to screening, including the erection of a solid 2.4m high hoarding around the boundary of each phase, with openings for the public to see the progress of the works; and
- Measures for protecting the wider environment, such as noise, air quality and water, from stockpiled contaminated demolition and exaction waste material.

12.16 Local air quality impacts are also likely during the demolition, excavation and construction phases of the development. The CEMP will also need to identify measures to control and monitor air pollution, taking into account the Mayor of London and London Council's guidance document 'The Control of Dust and Emissions from Construction and Demolition'. Due to the extended construction

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phase and proximity of sensitive receptors, real-time air quality monitoring (including baseline monitoring) will be required, where the authorities will need to agree the location of the monitoring equipment, the site trigger levels and what will happen should an exceedance occur.

12.17 There are no designated Archaeological Priority Areas within or adjacent to the OA. However, there is some potential for Roman and earlier archaeology within the OA. The Counter's Creek that ran through the OA also has some topographic, and potentially archaeological, importance. As the OA has archaeological potential, planning conditions will be used to require field evaluations to further understand the archaeological potential of the OA.

12.18 Apart from exceptional circumstances (such as work affecting Underground and Railway Lines undertaken during engineering hours or possessions), noisy building works which can be heard at the boundary of the site can only be carried out during the following permitted hours: Monday to Friday (08:00 to 18:00); Saturday (08:00 to 13:00) and at no time on Sundays or Bank Holidays. Any works carried out outside of permitted hours will need to be kept to a minimum, will be strictly controlled by the borough's Environmental Health departments and the surrounding community will need to be given prior notice.

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12.19 Construction noise and hours of operation are controlled by the borough's environmental health officers through Sections 60 and 61 of the Control of Pollution Act 1974.

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12.20 The noise level at which construction and demolition becomes significant will be assessed in accordance with Annex E of BS 5228-1: 2009. Significance will be based on absolute facade levels of 70dB(A)eqday where existing ambient noise levels, between 08.00 and 18.00, are within the PPG 24 range of noise levels for Noise Exposure Category A and B and 75dB(A)eqday where existing ambient noise levels are within the range of noise levels for NEC C and D. The duration criteria of E4 of Annex E will also apply.

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**Key Principle ENV4:**

Measures will be required at each phase to minimise and control the impact of demolition, excavation and construction on the environment and residents surrounding the OA.

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12.21 Given the close proximity of new and existing residents to the OA, demolition and construction methods should be selected to minimise their environmental impacts on residents in the surrounding area.

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12.22 Developers will be required to establish a Community Liaison Group (comprising construction, local authority and community representatives) managed by a Community Liaison Manager.

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12.23 In accordance with the Site Waste Management Plans Regulations 2008, Site Waste Management Plans (SWMPs) will be required for all developments over £300,000. SWMPs will demonstrate, among other things, how materials will be sourced and used efficiently to minimise waste generation.

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## Flood Risk and Sustainable Water Management

### Context

12.24 Much of West London, including the OA, is underlain by a shallow aquifer within river terrace deposits along with a deep aquifer within Thanet Sand and Upper Chalk formations. The Environment Agency note that the river terrace deposits underlying the OA constitute a 'Secondary Aquifer' of variable permeability. Records of shallow groundwater levels at the site are unavailable, although groundwater is typically encountered at depths of about 1.5 to 2.0m. A recent report on groundwater levels in the Chalk aquifer (Environment Agency 2007) indicates that the deep aquifer is located about 19m below ground level and the groundwater flows eastwards.

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12.25 Surface water historically drained into the Counters Creek, located in the general area of the existing railway corridor. Counters Creek was then moved to become a combined sewer located under Warwick Road. Given the substantial level changes across the site, surface water at EC1 and EC2 drains eastwards into the Counters Creek sewer. All other former surface drainage ditches are located in sewers, predominantly flowing westwards across the site towards North End Road.

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12.26 Sewerage infrastructure within the area is largely Victorian and contained within a combined storm water and foul water sewer system. The Counters Creek sewer is the most significant combined sewer in the area, serving an area as far north (upstream) as Brent and Camden. In addition to this, an integrated network of sewers and combined sewers traverse the OA. There are issues related to the capacity of this combined sewer in severe storms (see below), which have the potential to affect properties in the area of this combined sewer.

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12.27 The River Thames is located approximately 1.5km to the south of the OA. Water levels in the Thames in this location are subject to tidal movements, yet fluvial flows are relatively insignificant. Flood defences protect this part of London from the risk of flooding associated with tidal and storm surge events.

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12.28 A joint Strategic Flood Risk Assessment (SFRA) was carried out for RBKC, published in August 2009 and LBHF published in June 2010. The SFRA identifies that the majority of the OA in LBHF is located within Flood Zone 3, as defined by the Environment Agency. The area identified as Flood Zone 3 has a high probability of flooding, having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

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small part of the OA, in the area of North End Road and north of West Brompton station, is identified as Flood Zone 2, having a medium probability of annual flooding. his zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year. The remainder of the OA (the exhibition centres) is within Flood Zone 1 1, having a low probability of annual flooding of less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).

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## Policy Context

### 12.29 The Mayor's London Plan (2011):

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- 'Climate Change Mitigation' (Policy 5.1),
- 'Urban Greening' (Policy 5.10),
- 'Green Roofs' (Policy 5.12),
- 'Flood Risk Management' (Policy 5.12),
- 'Sustainable Drainage' (Policy 5.13),
- 'Water Quality and Wastewater Infrastructure' (Policy 5.14), and
- 'Water use and Supplies' (Policy 5.15).

### 12.30 LBHF's Core Strategy (2011):

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- 'Water and Flooding' (Policy CC2).

### 12.31 RBKC's Core Strategy (2010):

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- 'Earl's Court' (Policy CE1 and associated Vision)
- 'Climate Change' (Policy CE1), and
- 'Flooding' (Policy CE2).

### 12.32 London Draft Water Strategy (2009)

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## Sewer and Surface Water Flooding

### Key Principle ENV5:

Development in the OA will need to ensure that the peak flows entering any combined sewer will either be matched or reduced in comparison to existing peak flows, taking into account the impact of climate change. Developers must consult with and reflect the views of Thames Water and the Environment Agency on the design, capacity, size and construction of the proposed stormwater and sewer network.

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12.33 The combined sewer network (owned and operated by Thames Water) and in particular the Counters Creek sewer, poses the greatest risk of flooding in the OA. This is mainly due to the vast catchment area and the limited capacity of the sewer, which has the potential to back up during extreme rainfall events. This has occurred on several occasions, most recently in July 2007, when several properties along Counters Creek in LBHF and RBKC reported localised flooding.

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12.34 Climate change, and in particular the possible increase in storms, has the potential to increase flood risk. The impacts of climate change therefore need to be taken into account when considering the capacity of, and flows entering, the combined sewer network.

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12.35 Thames Water is preparing a bid to Ofwat for funding for the Counters Creek Sewer Flood Alleviation Scheme which will increase the capacity sewer network. Subject to securing funding from Ofwat and any necessary planning permissions and consents, construction could commence in 2014 with completion likely in 2018. However, the scheme is not yet confirmed. Regardless of the outcome, development must still meet the principles set out above. Thames Water is working with the developer to assess the impact of the development on surface water and foul water drainage.

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12.36 Where possible, gravity should be used to direct flows into the combined sewer network. If pumps are proposed, these should be carefully maintained to guarantee all year round use, so as to not increase flood risk, and sustainably powered to minimise carbon emissions.

### Flood Risk Assessment, Mitigation and Adaptation

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### Key Principle ENV6:

A Flood Risk Assessment (FRA), including an Exception Test, must be submitted with any major planning applications in the OA as required in accordance with Planning Policy Statement 25.

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12.37 In accordance with the Government's Planning Policy Statement 25, RBKC and LBHF have both produced 'Sequential Tests', which seek to prioritise development in Flood Zone 1, then Flood Zone 2 and lastly Flood Zone 3. As 60% of LBHF lies within Flood Zones 2 & 3, LBHF's Core Strategy (2011) states that it would be unreasonable to restrict development to the remaining 40%. Development proposals within the RBKC portion of the OA will need to have regard to findings and recommendations contained within the Council's Sequential Test for the Earl's Court Strategic Site allocation, June 2009.

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12.38 Planning Policy Statement 25 requires planning applications for development proposals of 1 hectare or greater in Flood Zone 1 and all proposals for new development located in Flood Zone 2 and 3 to be accompanied by a FRA. As the OA in LBHF is located with Flood Zone 2 and 3 and the OA in RBKC, is larger than 1 hectare a site specific FRA will be required to accompany applications for comprehensive redevelopment. FRAs will also be required for detailed planning applications at each phase. The FRA must identify all potential sources of flood risk within the OA, and consider approaches to mitigate any risks identified. The FRA must consider the cumulative impacts of different phases, any impacts on surrounding areas, such as upstream of sewer infrastructure, and the impacts of climate change, and consider approaches to mitigate any risks identified. The Environment Agency and Thames Water must be consulted on future planning applications in the OA, including each FRA, and their comments will be taken into account when determining planning applications. Furthermore, as much of the OA is located within Flood Risk Zone 3 and contains land uses classified as "more vulnerable" an exception test is required as part of the planning application.

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#### Key Principle ENV7:

Self contained basement dwellings will not be permitted in Flood Risk Zone 3. All habitable basement rooms within the OA must be equipped with pumps and non-return valves, and have suitable alternative means of escape.

12.39 In accordance with the Government's Planning Policy Statement 25, self contained basement dwellings will not be permitted in Flood Zones 3. Decking over the railway and TfL depot will change the 'ground level', so development in the OA will need to ensure that any changes in ground level will not increase the risk of flooding, especially where new 'basement' dwellings could be created. The Environment Agency does not object in principle to residential units located 600mm above the statutory flood level provided suitable means of escape are provided and no-return valves are installed.

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## Water Conservation

### Key Principle ENV8:

Residential development should be designed to limit mains water consumption to 105 litres per person per day or less.

12.40 The London Water Strategy promotes a simple hierarchy for strategic water management of 'lose less', 'use less' and 'reclaim more'. The London Plan Policy 5.15B sets out the Mayor's policy for water consumption, requiring development to minimise the use of mains water by incorporating water saving measures and equipment and designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day. In addition to this, RBKC Core Strategy (2010) Policy CE1 requires development to meet certain Code for Sustainable Homes and BREEAM targets, which include targets for water consumption.

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12.41 Given the presence of an aquifer beneath the OA, borehole abstraction should be investigated as a possible source of potable water. Rainwater harvesting should also be integral to building design. Rainwater harvesting measures can range from simple water butts to more complex systems linking buildings. Rainwater can be used for all non-drinkable uses, such as garden watering, car washing, toilet flushing and clothes washing. Rainwater harvesting must consider the cost and possible carbon emissions from pumping and filtration associated with capture compared with mains water. Gravity fed rainwater harvesting systems are preferred to pumped systems.

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12.42 To ensure water efficiency, all water using appliances installed in buildings in the OA (such as washing machines, dishwashers and shower heads) should be water efficient and industry coded as such. Water butts, aerated and spray taps, low-flow and dual flush toilets, vacuum drainage systems and waterless urinals should also be considered. This will be secured through condition or s.106 agreement as appropriate.

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## Sustainable Urban Drainage Systems (SUDS)

### Key Principle ENV9:

Development in the OA should aim to reduce the volume of the undeveloped site's surface water run-off at peak times to Greenfield run-off rates or better. Where possible development should aim to achieve 100% attenuation, or at the very least 50% attenuation on site, ensuring that surface water run-off is managed as close to

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its source as possible in accordance with the drainage hierarchy in the London Plan (Policy 5.13), SUDs must be incorporated into the design of buildings and public realm.

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12.43 In addition to floodrisk mitigation measures identified through the FRA and Sequential Test, development must incorporate SUDs to reduce the volume and rate of surface water runoff entering the storm water network.

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12.44 SUDs, either integrated into open space or buildings, are used to a) ease the rate of surface water entering the stormwater system during intense periods of rain, b) allow surface water to be absorbed into the ground as near to where it falls as possible and c) generally reduce the risk of surface water flooding. SUDs can also improve the quality of stormwater run-off, promote biodiversity and provide amenity to open space.

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12.45 Large parts of the OA consist of impermeable surfaces and hard standing which contribute to surface water flooding. The impermeable surfaces and hard standing are predominantly found in the area of Earl's Court 1 and 2, where decking is used to support the structure above the railway lines. There is also hard standing around the Empress State Building and the TfL Lillie Road Depot. Redevelopment of the OA must maximise sustainable urban drainage and where decking, hard standing or impermeable surfaces are required, surface water should be managed as close to its origin as possible and drained to areas of the OA where SUDs are provided.

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12.46 There are numerous SUDs measures that could be implemented across the OA, including:

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- Integrating green space, soft landscaping and planting, which are able to cope with extreme weather conditions, to reduce the impact of overheating, provide shade and attenuate stormwater flows;
- permeable and semi permeable surface materials (including materials used for pavements, driveways and highway construction);
- vegetated swales, basins, drainage channels, infiltration trenches and filter drains, retention ponds, wetlands and rain gardens;
- public and private gardens, green corridors and site wide native planting, including shrubs and trees;
- green and brown roofs and walls integrated into building design; and
- attenuation tanks and permeable soak aways.

12.47 Green and brown roofs on buildings require an impermeable membrane to ensure that water does not leak through the roof structure. This membrane then

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supports a layer of substrate and native vegetation. In addition to absorbing rainfall and dissipating stormwater runoff, green and brown roofs and green walls can sometimes improve the thermal performance of buildings and contribute to residential amenity. It is important that green and brown roofs are well maintained by those who manage the building.

Figure 12.2: Photograph of landscaped drainage channels

Figure 12.3: Photograph of a green roof

Figure 12.4: Photograph of swales at Upton

Figure 12.5: Photograph of Xeriscaping

## Waste Management

### Context

12.48 The amount of household waste generated in LBHF has decreased by 18 percent since 2005, whilst the recycling rate has increased from 21 percent to 27 percent. In RBKC, household waste generation (by weight) has decreased by 7 percent since 2005 and the recycling rate has increased from 20 percent to 31 percent. The recycling rates in LBHF and RBKC are higher than many other London Boroughs and greater levels of recycling are anticipated in the medium to long term, as assessed against the Mayor's London Plan (2011) targets.

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12.49 Both boroughs' waste transfer, disposal, recycling and processing services are currently provided by the Western Riverside Waste Authority (WRWA). These arrangements will continue due to contractual obligations until 2025. Municipal waste from within the WRWA area that previously went to landfill now goes to a new river fed energy-from-waste incinerator at Belvedere, Bexley. Co-mingled dry recycled material is now processed within the WRWA area, following the recent opening of a new facility at Smugglers Way, Wandsworth.

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12.50 The Waste Management Strategy for London (2010) sets the following targets:

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- achieve zero municipal waste direct to landfill by 2025;
- reduce the amount of household waste by 20 percent by 2031;
- recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031; and
- reuse and recycle 95 per cent of construction, excavation and demolition waste by 2020.

12.51 There are currently no dedicated waste or recycling handling facilities within the OA. All commercial waste generated by The Earl's Court Exhibition Centres is currently collected by a private contractor and disposed of under separate arrangements.

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**Policy Context**

**12.52 The Mayor's London Plan (2011):**

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- 'Waste Self-Sufficiency' (Policy 5.16), and
- 'Waste Capacity' (Policy 5.17).

**12.53 LBHF's Core Strategy (2011):**

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- 'Waste Management (Policy CC3).

**12.54 RBKC's Core Strategy (2010):**

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- 'Earl's Court' (Policy CP10 and associated Vision),
- 'Earl's Court Exhibition Centre Strategic Site' (Policy CA7), and
- 'Waste' (Policy CE3).

**12.55 Waste Strategy for England (2007)**

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**12.56 Waste Management Strategy for London (2010)**

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## Waste Collection and Management Systems

### Key Principle ENV10:

Redevelopment of the OA must deliver sustainable waste collection and management systems, taking into account industry best practice.

12.57 To deliver sustainable waste collection and management systems, development in the OA must accord with LBHF's 'Storage of Refuse and Recyclables' SPD and RBKC's 'Wastescape Design Guide' and incorporate the following principles:

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- Maximise recycling and waste diversion at source (e.g. in kitchens);
- Integrate with existing waste collection systems and infrastructure in LBHF and RBKC;
- Be cost effective;
- Accommodate green waste diversion and composting;
- Provide sufficient size and easily accessible refuse and recycling storage areas;
- Minimise refuse vehicle movements;
- Ensure that the highway network can accommodate refuse vehicles;
- Ensure that on-street street parking does not obstruct refuse vehicles; and
- Provide easily accessible bulky waste collection areas.

12.58 The authorities consider that a combination of standard bin stores and a chute-based suction system (Envac) would be most suited to development in the OA.

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12.59 In accordance with the Site Waste Management Plans Regulations 2008, Site Waste Management Plans must be prepared and implemented for development in the OA. The Site Waste Management Plan must be prepared in accordance with Defra Guidance and will be secured via any Section 106 agreement.

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## Centralised Waste Facility

### Key Principle ENV11:

At least one centralised waste management facility must be provided in the OA.

12.60 At least one centralised, on-site, waste management facility must be provided in the OA to manage the collection, sorting and storage of waste (including bulky items). This facility must be large enough to accommodate waste generated from the development at each phase and contribute to meeting the borough's waste

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apportionment targets. This facility should not impact on new or existing residential amenity, in terms of air quality and noise. Location, mitigation measures and/or a suitable buffer will therefore be required between any waste facility and sensitive land uses, such as residential dwellings. This facility will also be subject to the requirements in the Air Quality and Noise / Vibration sections of this Environmental Strategy. A centralised facility would ideally be located underground on the periphery of the OA and have good vehicular access to the strategic road network. Development proposals should also explore and where deemed appropriate use the waste facility to generate energy from waste.

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### Encouraging Waste Minimisation, Reuse and Recycling

#### Key Principle ENV12:

In addition to regulatory approaches, redevelopment in the OA should contribute towards reducing, reusing and recycling waste through non-regulatory and education based approaches.

12.61 In addition to regulated waste collection and management systems there are numerous non-regulatory and education based approaches to reduce, reuse and recycle waste, that should be implemented in the OA.

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12.62 Cupboards with integrated waste sorting facilities should be installed in every kitchen to encourage the separation of waste from recyclables. All kitchens, and other points of waste disposal, should also provide information on what can and cannot be recycled. Information should also be provided on waste reduction, such as buying loose fruit and vegetables to minimise packaging; using reusable bags and lunch boxes to reduce the use of plastic bags; buying goods in bulk, such as washing up liquid; insisting on 'no junkmail'; using taps or home filtered water rather than bottled water; buying products from recycled materials and composting garden waste.

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12.63 Waste minimisation measures should be promoted by on-site waste management arrangements and approaches to changing behaviour in consultation with LBHF and RBKC waste and recycling officers.

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### Composting

#### Key Principle ENV13:

Redevelopment of the OA should provide green waste and kitchen waste collection to support a community led composting scheme.

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| 12.64 Composting can be undertaken on a small scale domestic basis or community wide composting could be delivered through green and kitchen waste collection and disposal. Developers in the OA should set up a community led composting scheme, taking into account the guidance of the Community Composting Network (CCN).

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## Land Contamination and Remediation

### Context

12.65 A rich history of industrial land uses and practices has resulted in the potential contamination of land within the OA. These land uses include a former coal and goods depot, railway sidings, a brewery, laundries, an infilled canal and some works and factories that included chemical and fuel storage. Adjacent to the OA, potentially contaminative uses include a former brickfield (infilled with unknown material), a rifle range and a hospital. Current potentially contaminative uses include the TfL depot, laundries, dry cleaners and a mannequin manufacturer. Nearby off-site potential sources include a petrol station.

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12.66 The portion of the OA within LBHF and some parts within RBKC are therefore identified as potentially contaminated (under Part IIA of the Environmental Protection Act 1990) due to the probable risks associated with the past and present uses of the site.

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12.67 Land within the OA must be suitable for use prior to development and all potential contamination must be identified, assessed and remediation must be implemented. Remediation should be sustainable and not adversely impact the environment.

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### Policy Context

12.68 **The Mayor's London Plan (2011):**

- 'Contaminated Land' (Policy 5.21).

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12.69 **LBHF's Core Strategy (2011):**

- 'Protecting and Enhancing Environmental Quality' (Policy CC4).

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12.70 **RBKC's Core Strategy (2010):**

- 'Earl's Court' (Policy CP10 and associated Vision).

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12.71 **RBKC's Unitary Development Plan (2002) Saved Policies:**

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- 'Require additional information for developments on contaminated land' (Policy PU3), and
- 'Ensure appropriate protection for future users of contaminated land' (Policy PU4).

**12.72 Guide to help developers meet planning requirements, 2004** (various boroughs including RBKC but excluding LBHF), which is to be updated in 2011.

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**12.73 LBHF Draft Guidance for Developers of Land where Contaminated Land may be an Issue (2011)**

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**12.74** Land contamination is also controlled through other legislation, such as:

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- Part IIA of the Environmental Protection Act 1990;
- Contaminated Land (England) Regulations 2006;
- Defra Circular 01/2006 Contaminated Land Statutory Guidance;
- Environmental Permitting (England and Wales) Regulations 2010;
- The Hazardous Waste (England and Wales) Regulations 2005;
- The Environmental Damage (Prevention and Remediation) Regulations 2009; and
- Building Regulations 1991 (Building Act 1984).

**12.75 Guidance also exists to aid developers, environmental consultants and local authorities in addressing potentially contaminated land, including:**

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CLR 11: Model procedures for the management of Contaminated Land (Defra, 2004);

BS10175, The Investigation of Potentially Contaminated Land Sites;

The Definition of Waste: Development Industry Code of Practice, version 2 (CL:AIRE, 2011);

Assessing risks posed by hazardous ground gases to buildings (CIRIA 665, 2007); and

The VOCs Handbook. Investigating, assessing and managing risks from inhalation of Volatile Organic Compounds (VOCs) at land affected by contamination (Ciria 682, 2009).

## Assessment and Sustainable Remediation

### Key Principle ENV14:

Construction in the OA shall only begin once any potential land contamination has been identified, assessed and remediated in accordance with the stages below.

12.76 Potentially contaminated land should be identified, assessed and remediated in accordance with the following seven stages:

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- Preliminary Risk Assessment: This assessment should comprise of a desk top study which includes details of past and present uses at the site and the surrounding area to identify any potential sources of contamination. This should include a search of Council planning records. Any pollutants associated with these sources should be identified along with their potential related risks. It should then be determined what sensitive receptors are likely to be present at the development site such as humans, ecological receptors or building materials. Any pathway from potential on-site sources to off site sensitive receptors should also be identified. A conceptual site model should be produced to demonstrate where any pathway connects any of these sources to the sensitive receptors. This Source-Pathway-Receptor connection is known as a pollutant linkage.
- Site Investigation Scheme: This scheme is based upon the preliminary risk assessment and should set out how the site investigation will be carried out, how the sources of pollution identified in the conceptual site model will be targeted and determine the existence of the pathway to the identified receptors.
- Site Investigation: This investigation should follow the approved scheme and be undertaken using current guidance and methods. The results of the investigation must be clearly presented, compared against recognised and approved standards and interpreted so that it is clear for both Councils to see where remediation action is required.
- Risk Assessment: The results of the site investigation should be assessed to determine the degree and nature of any contamination on the site and the risks posed by any contamination to human health, controlled waters and the wider environment. The conceptual site model should be revised with the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages.
- Remediation Strategy: A detailed method statement for any required remediation works identified through the risk assessment should be produced with the aim of breaking any pollutant linkages.
- Verification: A report should be produced which validates and verifies that all of the works outlined in the remediation strategy have been undertaken as agreed. This would include details such as analytical results confirming successful in-situ remediation or importation or clean top-soil cover, the proper placement of gas

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membranes and waste transfer tickets demonstrating a duty of care in handling any off site transfer of excavated soil.

- On-going monitoring: If during development, contamination not previously identified is found to be present at the site, the Council should be immediately informed and no further development (unless agreed in writing by the Council) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is agreed in writing by the Council. There may also be situations in which confirmation that remediation has been successfully achieved or abated is necessary and monitoring past the completion of development is required. The scope of any monitoring should be agreed in writing by the Council. These works should then be reported to and agreed in writing by the Council, when it is demonstrated that no residual adverse risks exist.

**Key Principle ENV15:**

The remediation strategy will need to demonstrate that measures with the least environmental impact have been selected, especially considering transport and on-site treatment.

12.77 During the investigation, remediation, validation and on-going monitoring of potentially contaminated land, works with the least environmental impact should be selected. Environmental impacts should include carbon emissions, transportation of waste, air pollution, water pollution and noise and vibration from the works. In particular, an assessment of the environmental impacts of remediation works must be undertaken to determine the most appropriate method. The removal of contaminated land off-site should be considered the last option after more sustainable methods such as in-situ and on-site remediation. The phased approach to this development provides an opportunity to locate stockpiles of material for re-use on-site, near the soil hospitals where this material would be treated. Any in-situ remediation which may alter the hydrogeology of the site should be assessed to ensure it does not adversely impact surface water drainage and groundwater flow in the area.

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## Air Quality

### Context

12.78 LBHF and RBKC are both designated as Air Quality Management Areas (AQMA). This designation is due to levels of nitrogen dioxide (NO2) and particulate matter (PM10) in both boroughs that breach the Government's air quality objectives. Vehicles using Talgarth Road/West Cromwell Road (A4), Warwick Road, North End Road and Lillie Road are one of the main sources of NO2, PM10 and PM2.5 emissions affecting the OA. Buildings are also responsible for a significant amount of local emissions, especially NO2 from gas boilers. Figures 12.6 and 12.7 show the predicted annual mean levels of PM10 and NO2 in 2008 respectively, using data from the London Atmospheric Emissions Inventory 2008 (<http://data.london.gov.uk/laei-2008>). Figure 12.8 shows the number of days per year (in 2010) that PM10 exceeded the Government's objectives.

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Figure 12.6: Predicted annual mean levels of PM10 in 2008, with the Government's objectives shown in a blue line  
Figure 12.7: Predicted annual mean levels of NO2 in 2008, with the Government's objectives shown in a blue line  
Figure 12.8: Number of days per year (in 2010) that PM10 exceeds the governments objectives, which are shown in a blue line

### Policy Context

#### 12.79 The Mayor's London Plan (2011):

- 'Improving Air Quality' (Policy 7.14)

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#### 12.80 LBHF's Core Strategy (2011):

- 'Protecting and Enhancing Environmental Quality' Policy CC4.

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#### 12.81 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision)
- 'Air Quality' (Policy CE5).

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#### 12.82 RBKC Air Quality SPD (2009) and Air Quality Management Progress Report (updated annually)

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## Improving Air Quality

### Key Principle ENV16:

Redevelopment in the OA ~~should~~ be ~~at least~~ air quality neutral against existing levels and should include mitigation measures to improve air quality in accordance with the Mayor's Air Quality Strategy and local air quality action plans.

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12.83 A Low Emission Strategy (LES), incorporating an air quality assessment, ~~which compares current and future emissions,~~ will be required to assess the current and future air quality within the OA. The LES also needs to consider the potential air quality impacts, including health impacts on residents and other sensitive receptors, following each phase of development in the OA.

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12.84 The LES will need to propose measures to ensure that development is air quality neutral at each phase and where appropriate, set out measures to improve air quality (see possible mitigation measures below) in accordance with the Mayor of London's Air Quality Strategy and local air quality action plans. It may also be necessary to implement design solutions to minimise exposure to poor air quality, such as locating less sensitive uses in areas of poor air quality and/or incorporating appropriate mitigation measures.

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12.85 The adoption of energy efficient building design and integration of low / zero carbon heat technologies (such as Combined Heat and Power (CHP) systems, heat networks, photovoltaics, heat pumps etc) can help to reduce NO2 emissions from domestic and commercial gas boilers. However, some renewable technologies such as biofuelled CHP plants and biomass energy systems can potentially increase local emissions of NO2 and PM10, possibly impacting on air quality. The LES will therefore need to demonstrate how the impacts from any proposed installations are mitigated.

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12.86 In addition to the Mayor of London's Air Quality Strategy (2010), both boroughs have air quality action plans setting out measures to reduce emissions, improve local air quality and work towards meeting Government objectives. There are a number of mitigation measures, both regulatory and non-regulatory, that can help to reduce the impact of development on air quality. The LES will need to consider the feasibility of each of the following (but not limited to) mitigation measures;

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- locate non-residential and/or mixed use buildings along the Talgarth Road/West Cromwell Road (A4) and ensure residential buildings along heavily trafficked roads are recessed or incorporate further mitigation measures listed below;
- incorporate significant tree planting, planted areas or other green landscaping as barriers along major roads;
- limit emissions from heating and cooling of buildings by using passive heating and cooling designs and the use of low emission low/zero carbon technologies and where necessary use abatement technology;
- limit the ratio of off-street car parking to new dwellings in accordance with the Transport and Accessibility Strategy (Chapter 10) thus encouraging a low level of car ownership;
- require 20% of car parking spaces to provide electric vehicle charging facilities to encourage the uptake and use of these vehicles;
- implement 20mph zones and shared surface treatments on certain roads to reduce through traffic; and
- encourage walking and cycling by improving connectivity through the OA, improving access to public transport and requiring a green travel plan.

## Noise and Vibration

### Context

12.87 The main sources of noise and vibration in the OA are from road traffic, London Underground trains, West London Line trains (including freight trains) and aircraft on the Heathrow flight paths. The use of the TfL Lillie Road Depot for emergency track repairs and events at the Exhibition Centres also causes noise and vibration although these two sources of noise will be discontinued with redevelopment of the OA.

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### Policy Context

#### 12.88 The Mayor's London Plan (2011):

- 'Reducing Noise and Enhancing Soundscapes' (Policy 7.15).

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#### 12.89 LBHF's Core Strategy (2011):

- 'Protecting and Enhancing Environmental Quality' (Policy CC4).

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#### 12.90 RBKC's Core Strategy (2010):

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- 'Earl's Court' (Policy CP10 and associated Vision); and
- 'Noise and Vibration' (Policy CE60).

**12.91 Sounder City – The Mayors Ambient Noise Strategy**

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**12.92 RBKC Noise SPD (2009)**

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12.90 Noise and vibration is generally controlled through environmental protection legislation and British Standard Codes of Practice, including:

- World Health Organisation: Guidelines for Community Noise (1999);
- BS 8233:1999 (Sound Insulation and Noise Reduction for Buildings – Code of Practice);
- BRE/ Ciri 'Sound Control For Homes'
- BS 4142: 1997 - Rating industrial noise affecting mixed residential and industrial areas;
- BS 6472:2008 'Guide to Evaluation of human exposure to vibration in buildings (1Hz to 80Hz)';
- Building Bulletin 93 (BB93): Acoustic design of schools;
- Approved Document E - Resistance to the passage of sound;
- Control of Pollution Act 1974; and
- BS Code of Practice BS 5228 for noise vibration control on construction sites .



Mitigating Noise and Vibration

**Key Principle ENV17:**

Development must be designed and constructed to mitigate and adequately control noise and vibration. Noise and vibration sensitive land uses must also be located away from sources of noise and vibration, unless mitigation measures reduce the noise and vibration to acceptable levels.

12.93 In addition to the existing sources of noise and vibration, several proposed land uses in the OA have the potential to generate noise or vibration. These include new cultural facilities, bars and restaurants, road traffic, delivery vehicles and building services plant. Noise and vibration associated with the construction and demolition process is also a concern for the existing population, especially given the scale of development, phasing and the long term duration of construction. This is further considered in the section on 'Demolition, Excavation and Construction Impacts'.

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12.95 Planning applications in the OA must be accompanied by a noise impact assessment, prepared in consultation with authority Environmental Health Officers. This assessment will need to identify existing and potential sources of noise and vibration and the potential impacts and mitigation measures for the existing and new population. Noise sensitive land uses, such as residential dwellings, schools and hospitals, are those sensitive to existing sources of noise. The noise impact assessment will also need to determine the Peak Particle Velocity (PPV) and Vibration Dose Value (VDV) levels to establish the impact of traffic, including the impact of freight and passenger trains using the West London Line and District Line on buildings and general amenity.

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12.96 In accordance with National and European legislation, the Department for Environment, Food and Rural Affairs (Defra) is currently implementing a requirement to prepare Noise Action Plans (NAPs) that address and improve noise within the noisiest areas. The London Agglomeration NAP (March 2010) identified roads adjacent to the OA, including West Cromwell Road and Warwick Road, as containing "1st priority" locations for further investigation of traffic noise levels. The Highway Authority, in consultation with Environmental Health, must give consideration to how traffic noise in these 1<sup>st</sup> Priority Locations can be minimised through the use of appropriate mitigation measures. Given the scale of the proposed development, its location bounded by four major roads, including West Cromwell Road, and the likely impact of road traffic noise from the development, the NAP shall be required to include the major development proposals within the OA. Applicants will need to work closely with the Highway Authority and Environmental Health Departments to ensure

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that development proposals contribute to the production and implementation of the [Defra](#) NAP.

### Residential Noise Standards

12.97 All new housing should be designed to ensure that the internal noise levels are 'good' in accordance with BS8233, where individual noise events should not normally exceed 45 dB LAMax at night in bedrooms. Acoustically attenuated passive or mechanical ventilation should be installed as necessary. The location, design and internal layout of residential accommodation should ensure that living areas are located away from primary noise sources. Buildings should also be laid out so that alike rooms are above each other (i.e. bedrooms over bedrooms) and avoid stairs / common parts next to noise sensitive rooms.

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12.98 Developments should be constructed so that the impact of vibration from existing road, rail and industrial / commercial premises (e.g. gyms) falls into the category of 'Low Probability of adverse comment' as defined in BS6472. Private and communal gardens should be designed where practicable so that the steady noise level does not exceed the upper limit as cited in BS8233.

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### Industrial and Commercial Noise Standards

12.99 All developments and/or associated plant should be designed to ensure the existing ambient background noise levels at the nearest noise sensitive premises are not increased (i.e. that the rated level is at least 10dB (A) below the measured background level). Assessment shall be in accordance with [the detailed requirements of the RBKC Noise SPD in both boroughs.](#)

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12.100 Commercial servicing areas should be located away from residential areas and/or enclosed where possible. Delivery, goods handling operations and collection times will need approval as part of a servicing management plan to be secured by condition of planning permission. [Noise from these activities shall be assessed as per section 6.3 of the RBKC Noise SPD in both boroughs.](#)

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### Entertainment Noise Standards

12.101 Any development that provides music or entertainment (e.g. restaurants, pubs, clubs, and retail outlets) must be designed and constructed to ensure that the activities are inaudible at any noise sensitive premises, especially residential premises. Noise from these uses shall be assessed as per chapter 8.0 of the RBKC Noise SPD in both boroughs.

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### School Noise Standards

12.102 New educational facilities or improvements to existing facilities should be done so in accordance with Part E of the Building Regulations 2003 and Building Bulletin 93: Acoustic Design for Schools.

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## Ecology and Biodiversity

### Context

12.103 Ecology and biodiversity within the OA is predominantly found in a semi-natural green corridor running along the West London Line. There are two Sites of Nature Conservation Importance (SNCI) within this corridor (both Borough Grade I), and a further 12 SNCIs within 1km of the OA (all Local) including Brompton Cemetery. The 'Earl's Court and West Kensington OA – Ecological Aspirations report', which supports this SPD, sets out details on the ecological value of these SNCIs, including details of species found within 1km of the OA.

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### Policy Context

#### 12.104 The Mayor's London Plan (2011):

- 'Urban Greening' (Policy 5.10),
- 'Green Roofs and Development Site Environs' (Policy 5.11), and
- 'Biodiversity and Access to Nature' (Policy 7.19).

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#### 12.105 LBHF's Core Strategy (2011):

- 'Improving and Protecting Parks and Open Spaces' (Policy OS1).

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#### 12.106 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision); and
- 'Biodiversity' (Policy CE4).

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#### 12.107 LBHF Draft Biodiversity Action Plan and RBKC Biodiversity Action Plan.

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#### 12.108 London Biodiversity Action Plan.

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#### 12.109 Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011), DEFRA.

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#### 12.110 LBHF Parks Strategy.

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12.111 Paragraphs 98 and 99 of Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 also provides information on Biodiversity Action Plans and the consideration of protected species in the planning system. Natural England has also produced guidance on likely impacts of development proposals on protected species.

## Protect and Enhance Ecology and Biodiversity

### Key Principle ENV18:

Development will be expected to protect and enhance ecology and biodiversity within and adjacent to the OA with no net loss of species or habitat by:

- Protecting and enhancing the Sites of Nature Conservation Importance (SNCI) adjacent to the northbound West London Line platform at West Brompton Station;
- Replacing other Sites of Nature Conservation Importance to a significantly higher standard within the OA;
- Ensuring that there is no net loss (in area) of Sites of Nature Conservation Importance;
- Creating further habitats through the provision of open space, landscaping and tree planting focussing on priority native habitats suitable to the area (acid grassland, woodland and freshwater habitats);
- Ensuring that all green open space is connected to form a network of green spaces, with a focus on north-south connectivity;
- Delivering Sustainable Urban Drainage systems in the form of swales, rain gardens, ponds and surface drainage systems to provide habitat diversity;
- Requiring, where feasible, for all buildings to include green and brown roofs, together with some green walls, to encourage biodiversity habitats, facilitate migration, improve insulation, reduce the impact of the urban heat island effect, help regulate building temperatures and attenuate stormwater flows;
- Minimising light pollution to areas sensitive to bats and other wildlife.

### Key Principle ENV19:

Major planning applications in the OA must be accompanied by an Ecological Impact Assessment, including an ecological survey and ecological enhancement strategy. An ecological management plan will also be required through any Section 106 agreement.

12.112, . . . . Owing to its important habitat and SNCI designation, development will need to protect the ecological habitat immediately to the west of the West London Line northbound platform. This area is managed by the Local Agenda 21 Forum in partnership with Network Rail. If access to West Brompton Station is improved, proposals will need to be designed to incorporate this ecological feature. It contains a natural pond with water flowing from the exposed river gravels sitting on clay, which

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have allowed for a luxuriant growth of great reedmace (*Typha latifolia*), with smaller amounts of water plantain (*Alisma plantago-aquatica*) and floating sweet-grass (*Glyceria fluitans*). Also found in the area are *Ranunculus lingua* and *Scrophularia auriculata*, which are not found elsewhere in LBHF. There have also been sightings of *Bufo bufo* (the common toad) and *Acheta domesticus* (the common cricket) and has an extensive habitat for *Lucanus Cervus* (stag beetles). This area was botanically surveyed by LBHF biodiversity officers in June 2010 and when 99 native vascular plants were identified on one day.

12.113 The OA contains some valuable areas for ecology and biodiversity, especially along the railway lines. However, an important component of this framework is that development improves east-west connectivity by decking over the railway lines. The proposed decking over the West London Line and District Line provides publicly accessible green open space in the form of a linear park. The nature of this linear park, and open space in general, is set out in the Urban Form Strategy (Chapter 4). It is imperative that in addition to the space to be provided for recreational purposes in the linear park, additional space is provided to accommodate the re-provision of SNCIs affected by decking over the railway lines. In order to justify the potential disruption and relocation, the new ecological and biodiversity areas must provide significantly better habitats than currently exist in the OA and these must be provided on-site.

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12.114 In addition to this, other elements of the development must be designed to improve the ecology and biodiversity value of the OA, and protect SNCIs adjoining the OA, such as through the provision of native species of street trees, landscaping, green and brown roofs/walls and Sustainable Urban Drainage systems (swales and open water courses). The OA is also well located to attract protected species such as Great Crested Newts and bats roosting in trees or under old arches and measures to encourage these species should be considered. Significant piles of dead wood from large logs may also be ideal habitat for *Lucanus cervus*, (the stag beetle).

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12.115 Major planning applications in the OA must be accompanied by an Ecological Impact Assessment, including consideration of the impact of development on adjoining SNCI and an ecological enhancement strategy. An ecological management plan will be secured through any Section 106 agreement. These documents will need to reflect LBHF (Draft), RBKC and London Biodiversity Action Plans (BAPs), which identify local habitats that are important in both boroughs and the borough's strategy to improve ecology and biodiversity.

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Figure 12.9: The vegetation and semi-natural refuge that runs alongside the West London and District Lines

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## **Phasing and Section 106 Strategy**

### **Overview**

#### **Key Objectives**

Ensure a comprehensive approach to redevelopment of the OA; and

Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.

13.1 This chapter identifies the planning obligations that would need to be secured and the phases at which these should be delivered, where known, in order that any redevelopment proposals would deliver the Key Objectives and Key Principles that have been identified within the individual topic based chapters of this SPD. The list is not exhaustive but would form a starting point for negotiations and priority setting by the authorities.

13.2 The authorities will ensure that the development is carried out and delivered in accordance with the relevant London Plan and Core Strategy policies and insofar as may be appropriate, taking into account other material considerations, the Key Objectives and Key Principles of this SPD, which have been drafted with the need for flexibility in mind such that they can be applied to any application coming forward in the OA.

13.3 In order to achieve this, the council will require the following:

- 1: the appropriate contributions (either in kind or financial);
- 2: the appropriate mitigation measures to address any attendant impacts of the proposals; and
- 3: the relevant contribution or mitigation measures, secured within the relevant phase of the development.

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## Policy Context

### 13.4 The Mayor's London Plan (2011)

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- 'Annex One' (Opportunity and Intensification Areas)';
- 'Planning Obligations' (Policy 8.2); and
- 'Community Infrastructure Levy' (Policy 8.3).

### 13.5 LBHF's Core Strategy (2011)

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- 'Strategic Site and Housing Regeneration Area - FRA 1'; and
- 'Delivery and Monitoring'.

### 13.6 RBKC's Core Strategy (2010)

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- 'Earls Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' (Policy CA7); and
- 'Infrastructure Delivery and Planning Obligations' (Policy C1).

## Mayoral Community Infrastructure Levy

13.7 The Mayor has prepared draft proposals for a levy on development proposals within Greater London in order to fund infrastructure requirements including Crossrail. The levy comes into effect on 1st April 2012 and will be a material consideration when determining planning applications

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Deleted: 13.7 - The Mayor published his draft charging schedule for the Community Infrastructure Levy (CIL) in August 2010 for consultation. The responses to this draft are due to be heard at the CIL Examination in Public in late November 2011.¶



## **Key Principles**

### **Key Principle PS1:**

Planning obligations will be secured to ensure the delivery of a comprehensive and **acceptable** phased approach to any redevelopment of the OA.

**13.9** The authorities will require a comprehensive approach to redevelopment of the OA. This reflects the requirements of the site specific policies in the Mayor's London Plan (2011), LBHF's Core Strategy (2011) and RBKC's Core Strategy (2010). The use of appropriate planning obligations will be sought to ensure the delivery of a comprehensive and **acceptable** phased approach to any redevelopment in order that the Phasing and Section 106 Strategy Key Objectives can be met.

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### **Key Principle PS2:**

Any application for the comprehensive redevelopment of the OA should include a phasing strategy which would need to demonstrate that the proposed redevelopment together with re-provision of the existing housing would be carried out with the minimum disruption to existing residents.

**13.10** This strategy would need to demonstrate that the proposals would achieve an orderly and satisfactory development of the site and would need to set out how the appropriate land uses and infrastructure requirements are included at each relevant phase.

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### **Key Principle PS3:**

Any planning agreement would need to ensure that each phase of development is self sufficient in terms of its planning contributions towards environmental improvements, infrastructure and land uses.

**13.11** Any planning agreement needs to be structured in such a way so that were development to stop, the authorities would have secured the necessary contributions in order to deliver the infrastructure and land uses directly required for the needs of the development at the time. The authorities will also look to secure the provision of temporary facilities where relevant. In some circumstances, the authorities will expect the infrastructure or land use to increase incrementally with development. This is particularly true of publicly accessible open space, play space (UF17) and affordable housing (HO9) and any planning agreement would need to tie down the delivery of these.

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**Key Principle PS4:**

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Any planning agreement would need to include triggers requiring the delivery of/contributions towards necessary infrastructure to coincide with development/occupation. It should also include contingency plans should the comprehensive redevelopment of the OA not be completed as envisaged at the time any planning permission is granted.

13.12 It is important that the OA is provided with the necessary infrastructure and land uses to support the needs of the new community. If delivered too early, these facilities are likely to be underused and therefore waste public and private assets. If delivered too late, the existing facilities in the vicinity of the OA could have an undue burden placed on them, hindering their ability to operate. The authorities will therefore require any planning agreement to include a number of triggers which ensure that infrastructure and land uses are delivered at the right time in order to support the growing needs of the population.

13.13 Contingency plans may be required for the delivery of infrastructure and land uses where relevant. The authorities for example, consider east-west connectivity across the OA to be key to the wider delivery of comprehensive redevelopment and will therefore look to secure its delivery as early as possible (see para 4.15). The authorities may therefore require a contingency plan to be put in place to ensure the delivery of an east-west route through the OA should comprehensive redevelopment of the OA not proceed in the way envisaged in the Phasing Strategy required in Key Principle PS2.

## Urban Form Strategy

### Key Objectives

#### Maximise connectivity;

Establish an **urban grain** within the OA that is inspired by the surrounding pattern of streets and open spaces;

Provide good quality **public open space** that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;

Ensure that new buildings on the **edges** of the OA are sensitively integrated into and enhance the existing context;

Ensure that no new buildings visible on the **skyline** have a negative impact on the quality and character of the surrounding townscape; and

Design well proportioned **streets** that respond to those in the surrounding area and encourage walking and cycling.

### List of planning obligations arising from the SPD:

#### 13.14 Public Open Space;

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- public open space (including a contiguous park of 2 hectares), delivered incrementally on a phased basis attendant to the increase in the living and working populations (**Key Principle UF12**); and
- equipped play facilities that meet the locational standards set out in the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008) and that are of a size that adequately caters for children in their catchments (**Key Principle UF16**).

Figures 13.1 to 13.6: Precedent images for open spaces

## Housing Strategy

### Key Objective

Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

### List of planning obligations arising from the SPD:

#### 13.15 Estate Regeneration:

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- any development proposals involving the regeneration of the West Kensington and Gibbs Green estates to ensure that they would not result in the net loss of any affordable housing both in terms of floorspace and numbers of units (**Key Principle H02**);
- any affordable housing provided to facilitate the reprovision of housing for the residents of the estates to demonstrate that it would address the housing needs in the individual phases of the development (**Key Principle H03**);
- the social rented housing provision on the Seagrave Road car park site to provide a mix which would facilitate the reprovision of housing for an identified proportion of the residents of the estates (**Key Principle H04**); and
- a Phasing Strategy which demonstrates minimal disruption to existing residents when redeveloping the OA (**Key Principles H05 and PS2**).

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#### 13.16 Tenure Mix:

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- the appropriate levels and mix of affordable housing in LBHF (**Key Principle H06**) and RBKC (**Key Principle H07**); and
- measures to control the affordability and management of affordable housing within the OA (**Key Principles H010 and H011**).

Figure 13.7: Photograph of a new housing development at River Gauche, Paris. Photograph by Urban Exposure

## Employment Strategy

### Key Objective

Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

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List of planning obligations arising from the SPD:

**13.17 Business Provision:**

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- affordable business space suitable for very small, small and medium sized enterprises and incubator units (**Key Principle ES5**).

**13.18 Employment and Training:**

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- contributions towards sector specific support for business affected by the closure of the Earl's Court Exhibition Centres (**Key Principle ES6**);
- procedures and financial contributions towards cost of facilitating local procurement (**Key Principle ES7**);
- support and funding of Workplace Coordinators to ensure local people benefit from employment opportunities (**Key Principle ES8**);
- a Construction Training Centre to be provided pre and during construction (**Key Principle ES8**);
- provision of a Recruitment and Job Shop (**Key Principle ES8**);
- a Local Labour, Skills and Employment Strategy (**Key Principle ES9**); and
- a Local Labour, Skills and Employment Delivery Plan (**Key Principle ES9**).

## Retail Strategy

### Key Objectives

New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and

Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

### List of planning obligations arising from the SPD:

#### 13.19 Retail Controls:

- a Retail Management Plan which controls issues such as phasing, size of retail units, convenience /comparison split by floorspace, limitations on other retail related uses (A Classes), range and number of independent shops, prohibition on mezzanine floors and active frontages (**Key Principle RS5**);
- affordable shops (**Key Principle RS7**); and
- the allocation of land, with a North End Road address, for the potential relocation of North End Road street market (**Key Principle RS8**).

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Figure 13.8: Retail in the area surrounding the OA

## Culture Strategy

### Key Objectives

Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and

Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

### List of planning obligations arising from the SPD:

#### 13.20 A New Cultural Destination:

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- cultural facilities, including affordable workshop/studio space, to be provided within early development phases (**Key Principles CS1, CS2 and CS3**);
- contributions towards the enhancement of Brompton Cemetery (**Key Principle CS1**); and
- affordable artists studios (**Key Principle CS3**).

#### 13.21 Public Art:

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- public art (**Key Principle CS5**).

## Social & Community Facilities

### Key Objective

Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

#### List of planning obligations arising from the SPD:

##### 13.22 Education:

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- contributions (in kind and financial) towards the relevant nursery, primary and secondary education provision. The primary and secondary school should be co-located and provided within the early phases of development (**Key Principle SC1**).

##### 13.23 Health:

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- a health facility, to be provided within early development phases (**Key Principle SC2**); and
- financial contributions towards health provision (**RBKC Core Strategy Policies CA7 and C1**).

##### 13.24 Sports and Leisure:

Deleted: 20

- affordable sports and leisure provision (**Key Principle SC4**).

Deleted: SC3

##### 13.25 Police Facilities:

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- a community policing facility and financial contributions towards staffing the facility (**Key Principle SC6**); and
- financial contributions towards CCTV and expanding capacity in the boroughs' CCTV control centres (**Key Principle SC6**).

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##### 13.26 Community Space:

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- a community hub to be provided within early development phases (**Key Principle SC7**); and
- social and community floorspace in the Earl's Court Strategic Site (**RBKC Core Strategy Policies CA7 and C1**).

Deleted: SC6

Figures 13.9 and 13.10: Photographs by Dave Morris

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## Transport & Accessibility Strategy

### Key Objectives

Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;

Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and

Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

13.27 It should be noted that redevelopment within the OA is likely to be delivered in phases over a period of many years. The delivery of development will need to be coordinated with capacity improvements to public transport and the road network. Development proposals must be supported by a robust Transport Assessment that sets out clearly demand by phase, including construction traffic, and sets that against the available transport capacity. A series of interim assessments of impact will need to be made so that the cumulative impacts of development phases are understood and to ensure that development is brought forward only when sufficient transport improvements are in place to accommodate it. The delivery of development will need to be controlled via planning obligations to ensure that development is only implemented once appropriate transport improvements are in place.

Deleted: 23

13.28 Any changes to the road network, London Underground and Network Rail facilities and London Buses are subject to detailed design and operational agreement by the relevant organisations.

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### List of planning obligations arising from the SPD:

#### 13.29 Walking and Cycling:

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- all streets to be built to adoptable standards and offered for adoption to the relevant Highway Authority (**Key Principle TRN3**);
- a comprehensive wayfinding strategy in line with TfL's Legible London standards (**Key Principle TRN5**);
- significant streetscape and footway capacity improvements on the roads surrounding the OA– in particular North End Road, Warwick Road, Old Brompton

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- Road / Lillie Road, West Cromwell Road (A4 improvement scheme) and Earl's Court Road (**Key Principle TRN6**);
- improved pedestrian crossings on Lillie Road at West Brompton station, on Warwick Road at Earl's Court station, at West Cromwell Road's junctions with North End Road and Warwick Road and any potential crossing at the proposed new A4 junction (**Key Principle TRN7**);
  - new pedestrian and cycle connections north under the A4 West Cromwell Road and south under Lillie Road, if required following investigation as part of the Transport Assessment(s) (**Key Principle TRN7 and TRN8**);
  - improved east west cycle connectivity and linkages into the OA as identified within Transport Assessment(s) (**Key Principle TRN8**);
  - cycle parking in the OA, on the surrounding streets and at all local stations (**Key Principle TRN9**); and
  - an extension of the Mayor's cycle hire scheme into the OA (**Key Principle TRN9**).

Figure 13.11: The London Underground

### 13.30 Public Transport:

Deleted: 26

- reopening of the pedestrian tunnel under Warwick Road, including step-free access and/or increases to gateline capacity at the Warwick Road entrance to Earl's Court Station (**Key Principle TRN12**);
- a new station entrance to the eastern end of West Kensington Station, including step-free access and/or increased gateline capacity at the current entrance (**Key Principles TRN13 and TRN14**);
- improved gateline capacity at West Brompton Station (**Key Principle TRN 13**);
- increased concourse space at West Brompton Station (**Key Principle TRN13**);
- implementation of improvements to stairways at West Brompton Station, subject to investigation of feasibility and heritage concerns (**Key Principle TRN13**);
- step-free access to all platforms at West Kensington Station (**Key Principle TRN 14**);
- step-free access to the south-bound District Line platform at West Brompton station (**Key Principle TRN 14**);
- platform lengthening at West Brompton Station to allow for eight car trains, including any associated station improvements to ensure sufficient capacity to accommodate any additional passengers (**Key Principle TRN15**);
- improvements to the public realm and interchange facilities at each of the three local stations (**Key Principle TRN16**);

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- measures to provide increased bus capacity including provision of bus route enhancements (**Key Principle TRN17**);
- improvements to bus stops and other facilities, including re-provision of bus stands (**Key Principle TRN17**); and
- taxi ranks and coach parking and drop off facilities (**Key Principle TRN18**).

**13.31 Road Network, Car Parking and Freight;**

Deleted: 27

- north-south connectivity through the OA to provide extra road capacity (**Key Principle TRN19**);
- a new access onto the A4 West Cromwell Road (**Key Principle TRN19**);
- a study to identify and then funding to implement any necessary signal changes on the surrounding road network (**Key Principle TRN19**);
- reconfiguration of the North End Road and Lillie Road junction and the provision of alternative routes through the site to relieve traffic congestion (**Key Principle TRN19**);
- other new site accesses, as agreed with the Highway Authorities (**Key Principle TRN19**);
- a review of local traffic management arrangements and mitigations where appropriate to address 'rat running' issues (**Key Principle TRN21**);
- investigation of improvements to the Earl's Court One Way System, including to the pedestrian environment, and funding of identified measures (**Key Principle TRN 22**);
- car club bays (**Key Principle TRN24**);
- electric vehicle charging points (**Key Principle TRN24**);
- Travel Plans for all uses (**Key Principle TRN24**);
- all new residential units to be Permit-free (**Key Principle TRN25**);
- on-street parking and a review of existing CPZs and mitigations, including extension or amendments to existing zones or new zones (**Key Principle TRN25**);
- consolidated local delivery and servicing centres for freight and domestic deliveries (**Key Principle TRN26**);
- a rail freight transfer facility for construction materials and spoil removal subject to feasibility analysis as part of the Transport Assessments (**Key Principle TRN26**);
- Delivery and Servicing Plans (**Key Principle TRN26**); and
- Construction Logistics Plans for each relevant phase of development (**Key Principle TRN26**).

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## Energy Strategy

### Key Objectives

All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and

All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

### List of planning obligations arising from the SPD:

#### 13.32 Supplying Energy Efficiently:

- decentralised energy (including associated heat network), associated energy centres and infrastructure, including the provision of an energy centre in the first phase of the development (**Key Principle ENE2**).

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## Environmental Strategy

### Key Objectives

Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;

Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;

Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;

Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and

Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

**Deleted:** Minimise the impacts of demolition, excavation and construction on the surrounding community and sustainably remediate contaminated land;¶

### List of planning obligations arising from the SPD:

#### 13.33 Demolition, Excavation and Construction Impacts:

- construction, demolition and excavation logistics plans (**Key Principle ENV2**).

**Deleted:** 29

#### 13.34 Waste Management:

- at least one centralised waste management facility (**Key Principle ENV8**);and
- a Site Waste Management Plan prepared in accordance with Defra Guidance (**Key Principle ENV11**).

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#### 13.35 Ecology and Biodiversity:

- an ecological management plan (**Key Principle ENV19**).

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[Figure 13.12: Site of Nature Conservation Importance, viewed from Seagrave Road car park.](#)

# EQUALITY IMPACT ASSESSMENT

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## Equality Impact Assessment - Earl's Court and West Kensington Opportunity Area Supplementary Planning Document

March 2012

Overall Information	Details of Full Equalities Impact Assessment
Financial Year and Quarter	2011-2012, Q4
Name and details of policy, strategy, function, project, activity, or programme	<p>The Earl's Court West Kensington Opportunity Area (the 'Opportunity Area') Supplementary Planning Document (SPD) sets out detailed planning guidance on how the area should be redeveloped.</p> <p>The document is prepared as a Supplementary Planning Document (SPD) to supplement policies in LBHF's Core Strategy (2011) and the RBKC Core Strategy (2010) and Supplementary Planning Guidance (SPG) to supplement policies in the London Plan (2011).</p>
Name of Service Department	<p><b>LBHF:</b> Thomas Cardis, Earl's Court Project Team, Environment Services, London Borough of Hammersmith and Fulham, King Street.</p> <p><b>RBKC:</b> Brendon Roberts, Strategic Developments, Planning and Borough Development, RBKC Town Hall, Hornton Street</p>
Date of completion of final EIA	<b>March 2012</b>



<b>Section 02</b>	<b>Scoping of Full EIA</b>
<b>Plan for completion</b>	<p>The Opportunity Area SPD is of high public interest and therefore a full EIA is necessary.</p> <p><b>Timing:</b> The EIA supports and informs the drafting of the SPD,</p> <p><b>Resources:</b> Officer Time, census data and other statistics as listed throughout, feedback from preliminary issue-based consultation and first and second consultation on the SPD.</p> <p><b>Lead Officer:</b> Thomas Cardis</p>
<b>What is the policy, strategy, function, project, activity, or programme looking to achieve?</b>	<p><b>Objectives</b> The SPD sets out detailed planning guidance on how the Opportunity Area should be redeveloped on a comprehensive basis. The objectives of the SPD are:</p> <p><b>Urban Form</b></p> <ul style="list-style-type: none"> <li>• Maximise <b>connectivity</b>;</li> <li>• Establish an <b>urban grain</b> within the OA that is inspired by the surrounding pattern of streets and open spaces;</li> <li>• Provide good quality <b>public open space</b> that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;</li> <li>• Ensure that new buildings on the <b>edges</b> of the OA are sensitively integrated into and enhance the existing context;</li> <li>• Ensure that no new buildings visible on the <b>skyline</b> have a negative impact on the quality and character of the surrounding townscape; and</li> <li>• Design well proportioned <b>streets</b> that respond to those in the surrounding area and encourage walking and cycling.</li> </ul> <p><b>Housing</b></p> <ul style="list-style-type: none"> <li>• Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.</li> </ul> <p><b>Employment</b></p> <ul style="list-style-type: none"> <li>• Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.</li> </ul>

**Retail**

- New 'comparison' retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd's Bush, Kensington High Street and King's Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and
- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

**Culture**

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor's London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl's Court 'brand'.

**Social and Community facilities**

- Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

**Transport**

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

**Energy**

- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

**Environment**

- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

**Section 106 and Phasing Strategy**

- Ensure a comprehensive approach to redevelopment of the OA; and
- Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.

**Assessment of Objectives**

The SPD objectives are assessed against the nine protected characteristics, with an overall guide to findings in the chapters given below:

<p><b>Age</b></p>	<p>+/-</p>	<p><b>H</b></p>	<p>Where age is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds). Those under 18 are not protected under Age at present under the Act. Therefore, the impact on children and young people is assessed under Children’s Rights.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment accommodating all age groups. All housing is proposed to be built to lifetimes homes standards and 10% of all housing will be built to wheelchair homes standards. There will be a substantial improvement in general accessibility throughout the OA with barriers to accessibility removed and footways and crossings built to accommodate all age groups. There will be accessibility improvements at the three nearby London Underground Stations. All new infrastructure including health and community facilities will accommodate all age groups.</p>
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				There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.
	<b>Disability</b>	+/-	<b>H</b>	<p>A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p> <p>Redevelopment of the OA in accordance with the Urban Form Strategy objectives requires designing buildings and places so that they are accessible to all. All housing is proposed to be built to lifetimes homes standards and 10% of all housing will be built to wheelchair homes standards. There will be a substantial improvement in general accessibility throughout the OA with barriers to accessibility removed and all footways and crossings built to accommodate people with disabilities. Accessibility improvements are proposed at the three nearby London Underground Stations. All new social and community facilities will be designed to accommodate those with disabilities.</p> <p>There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.</p>
	<b>Gender reassignment</b>	<b>N/A</b>	<b>N/A</b>	<p>Gender reassignment is the process of transitioning from one gender to another.</p> <p>The SPD objectives have not so far emerged as relevant to this protected characteristic because it is not seeking to provide a service (e.g. land use for a health or care service for those transitioning).</p>
	<b>Marriage &amp; Civil Partnership</b>	<b>N/A</b>	<b>N/A</b>	<p>Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.</p> <p>The law does not require service providers to take into account the impact of what they do on married people and civil partners. The SPD objectives have not so far emerged as relevant to this protected characteristic because it is not aiming to put in place a service for married people or civil partners (e.g. land use for a registrars service).</p>
	<b>Pregnancy and</b>	+/-	<b>L-H</b>	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the

	<b>maternity</b>			<p>employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p> <p>Redevelopment of the OA in accordance with the Urban Form Strategy requires designing buildings and places so that they are accessible to all. In accordance with the Housing Strategy, a wide range of affordable and accessible housing will be provided including for families. There will be a substantial improvement in general accessibility throughout the OA with barriers to accessibility removed and all footways and crossings built to safely and conveniently accommodate prams, buggies and young children which will positively impact on pregnant women and parents with babies and children. This will positively impact on pregnant women and women with babies and children, because it will make it easier for them to get about the OA There will also be accessibility improvements at the three nearby London Underground Stations. New social and community facilities including health facilities, nurseries and community facilities will also serve the OA.</p> <p>There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.</p>	
	<b>Race</b>	+/-	<b>L-H</b>	<p>Race refers to the protected characteristic of race. It refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment capable of accommodating all racial groups and ethnic minorities. In accordance with the Housing Strategy a wide range of housing typologies and tenures will be provided covering a broad range of affordability. 43% of the population on the West Kensington and Gibbs Green Estates come from minority backgrounds. Any estate regeneration is therefore likely to have a particularly strong impact on these minorities. Estate regeneration provides all residents with the opportunity to remain in the area in high quality new affordable housing if they so wish. A lively cultural quarter will also be established accommodating a wide range of arts and cultural activities. Education, health and community facilities, open space and play space will be available and usable by all. Local employment opportunities will also be created for all.</p>	

			There are negative impacts in relation to the disruption caused by the potential redevelopment of the estates. This is set out in detail in the assessment of the Housing Strategy below.
<b>Religion/belief (including non-belief)</b>	<b>+</b>	<b>L-H</b>	<p>Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment accommodating all religious groups. All social and community infrastructure will be available for use by faith and special interest groups and the community hub will be required to include multi-faith space. Public open space and green space will also be available for formal and informal events.</p>
<b>Sex</b>	<b>+</b>	<b>L-H</b>	<p>Sex means a man or a woman.</p> <p>Redevelopment of the OA in accordance with the SPD objectives will deliver an integrated, inclusive urban environment, with some chapters being more relevant to this protected characteristic than others</p>
<b>Sexual Orientation</b>	<b>N/A</b>	<b>N/A</b>	<p>Sexual orientation means whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.</p> <p>The SPD objectives have not emerged as relevant to this protected characteristic because it is not seeking to provide a service (e.g. land use for a service for lesbian, gay, bisexual, or heterosexual people).</p>

**Human Rights**

It is not considered that the Objectives will have an impact on Human Rights

**Children's Rights**

As given throughout, there are a number of ways in which the SPD will impact positively on Children's Rights

<b>Section 03</b>	<b>Assessment of relevant data and/or undertake research</b>
<b>Documents and data reviewed</b>	<p>The following documents and data have been used to help inform this Equality Impact Assessment:</p> <p><b>LBHF Single Equality Scheme</b>  The Single Equality Scheme simplifies how we meet our requirements for all, including groups protected by discrimination law. Officers have given careful consideration to the statutory codes in relation to race, gender, and disability in preparing the scheme, as well as to the duties that were expected to arise from the Equality Act 2010, and most of the provisions which came into force on 01 October 2010 (see below).</p> <p>The Single Equality Scheme objectives are based on the same Community Strategy objectives as the Spatial vision of the LBHF Core Strategy in terms of creating a borough of opportunity for all, including promoting home ownership and regenerating the most deprived parts of the borough. The ECWKOA SPD works to these same broad objectives.</p> <p><b>RBKC commitment to Diversity and Equality</b>  RBKC is no longer employing an Equality Scheme approach and are instead developing a more targeted approach which aims to be transparent, responsive, specific and outcome focused.</p> <p>.</p> <p><b>Public Sector Equality Duty</b>  The public sector equality duty (PSED) states that in the exercise of our functions, we must have due regard to the need to:</p> <ul style="list-style-type: none"> <li>▪ Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act;</li> <li>▪ Advance equality of opportunity between people who share a protected characteristic and those who do not; and</li> <li>▪ Foster good relations between people who share a protected characteristic and those who do not.</li> </ul> <p>Having due regard for advancing equality involves:</p> <ul style="list-style-type: none"> <li>▪ Removing or minimising disadvantages suffered by people due to their protected characteristics;</li> <li>▪ Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and</li> <li>▪ Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low</li> </ul> <p>The Act states that meeting different needs involves taking steps to take account of groups with protected characteristics. It describes fostering good relations as tackling prejudice and promoting understanding between</p>

people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

### **LBHF Community Strategy**

The Community Strategy was produced in 2007 and sets the framework of objectives used for both the LBHF Core Strategy and the Single Equality scheme. The Strategy was developed with local partners from across the public, private, voluntary and community sectors and was subject to public consultation. As partners in delivering local services the aim of the Council through the community strategy is to combine opportunity, with social responsibility and social justice to assist the vast majority of people in the borough to help themselves whilst supporting the most vulnerable in the community. The Community Strategy is therefore considered to be consistent with the statutory codes in relation to race, gender, disability etc.

### **RBKC Community Strategy**

The Community Strategy was produced in 2008 and contains a suite of documents, which includes The Future of Our Community – Community Strategy (a set of long-term ambitions and some specific aims and objectives that will help achieve these ambitions), A Picture of Our Community (some facts and figures which support the ambitions, aims and objectives captured in the community strategy) and Improving Our Community (identification of which partner/s who will take the lead in achieving these and how, a set of measures to show progress and a public report clearly showing what has been achieved). The Community Strategy states that “the borough contains one of the most diverse populations in London. The community strategy recognises this and aims to respond to the needs and ambitions of all residents in the borough”.

### **RBKC Local Development Framework – Equalities Impact Analysis of the Core Strategy and North Kensington Plan**

This EqIA examines the emerging Royal Borough of Kensington and Chelsea Local Development Framework (LDF). Although the LDF consist of several Development Plan Documents the EqIA will focus upon the Core Strategy and North Kensington Plan as it provides the vision and strategy for the borough and the core policies needed for that vision to be achieved. The EqIA concludes that the Core Strategy planning policies have taken into account a great number of equality issues, which affect the population of the Borough, through this Equalities Impact Analysis, the Core Strategy policies will be reviewed through annual monitoring to ensure that the policies have no negative effect upon equality groups, and provide a flexible framework to adapt to the changing needs of the Royal Borough.

### **Demographic Information Available**

The OA’s residential population is approximately 1,900, with the vast majority of residents (1,500) living in the West Kensington Estate and a much smaller number (206) in the Gibbs Green Estate. The remaining residents live in converted flats on North End Road and Lillie Road, and in converted houses, flats and maisonettes between Old Brompton Road and the Seagrave Road Car Park. There are 660 residential units in the West Kensington and 110 residential units in the Gibbs Green Estate, and an average of just over 2 people per household. The West Kensington Estate is the fifth largest estate in LBHF.



**Age**

In terms of demographics, 24 percent of residents within the Gibbs Green and West Kensington Estates are under the age of 15, compared to 15 percent overall across LBHF and RBKC and 19 percent across Greater London. Across the North End and Fulham Broadway wards the most populous age group is between 18 and 34, making up 44 percent of the population. Breaking this demographic down further, the 30 to 44 age group comprise the single biggest age group (28 percent) within the surrounding wards of Earls Court, North End and Fulham Broadway. The 20 to 29 age group is the second largest at ward level comprising 26 percent of the residential population. This figure is 5 percent above the LBHF and the RBKC average, and 9 percent above the London average.

**Sex**

Female residents make up 52 percent of the residential population, in line with figures for LBHF and RBKC and 1 percent above the comparative figure for Greater London. The OA has an overall density of 19 people per hectare, well below the LBHF average of 105 persons per household although this is to be expected considering there are no residents within the RBKC part of the ECWKO and there is a substantial amount of non-residential use within the OA.

**Race**

The ethnic composition of OA residents is varied with a high proportion of foreign born residents. There are a high proportion of people of black and black British ethnicity with 27 percent of residents in the West Kensington Estate and 17 percent of residents within the Gibbs Green estate identifying themselves within this group. At the ward level, the ethnic composition is broadly in line with that of RBKC and LBHF, although the proportion of residents from a non-white background was slightly lower than that for Greater London. Overall, 'British and Irish white' and 'other white' is the biggest ethnic group in the Earls Court, North End and Fulham Broadway wards, although there is also considerable diversity within the white ethnic group. 23 percent of residents in Earls Court and adjacent wards are of non-British and non-Irish backgrounds, compared with 15 percent in LBHF, 25 percent in RBKC and 8 percent in Greater London.

Overall, population has grown consistently over the past 20 years in both LBHF and RBKC, although the GLA estimates there will be a steady but gradually declining rate of growth in the population of both LBHF and RBKC up to 2031. However, LBHF is expected to grow at a faster average annual rate over this period and accordingly its population is forecast to surpass RBKC's population in the short to medium term. By 2031, the population is estimated to reach 209,400 in LBHF and 187,900 in RBKC, with a total of 8,804,000 residents in Greater London.

**Gender Reassignment and Lesbian, Gay, Bisexual and Heterosexual People**

Official statistics, such as census data are not collected on LBG and heterosexual people and so are not available with regards to sexual orientation within London Borough of Hammersmith and Fulham or the Royal Borough of Kensington and Chelsea. However, the ONS's most recent research indicates that 1.5% of the adult population identify as lesbian, gay, or bisexual. This figure, taken proportionately across all equality strands is the basis for our

assessment on LGB people.

The 2001 census recorded 568 people (or 1.1% of couples), aged 16 and over, living as same sex couples in Hammersmith and Fulham. In 2009 there were 49 civil partnerships in this borough. Data on heterosexuality as such is also not collated although given the estimated numbers of LGBT people, it appears that the majority of the population is heterosexual. Data on transgendered or transitioning people was not available for either borough.

### **Disability**

It is estimated that there are more than 10 million disabled people in the UK (Source: LBHF Access for All 2006) and more than 800,000 disabled people in London (Source: London Plan SPD: Planning for Equality 2007). This presents a significant challenge to ensure that new development makes provision for people with disabilities.

The proportions of people stating they have a limiting long term illness in the 2001 Census was 13.6 per cent in RBKC. Census data for H&F shows that in 2001, 14.66% of its population stated that they had a limiting long-term illness. Benefit data on the numbers and proportions of people claiming benefits for reasons of health, disability and incapacity can also provide an insight into these characteristics of a population. At May 2010, 6.6 per cent of the population of Hammersmith and Fulham were claiming incapacity benefits, compared with 5.3 per cent in RBKC. Based on the last census the predicted rate (2009) of disability in RBKC for all ages was 11% and 14% for residents of working age.

The H&F Single Equalities Scheme (SES) indicates that 15% of residents in Hammersmith and Fulham have a disability. Additionally, 9 percent of respondents to the preliminary SPD consultation carried out in October/November 2010 identified themselves as disabled (there were 1075 responses from a broad catchment within a 650m radius of the OA), although 9 percent of respondents to the preliminary SPD consultation carried out in October/November 2010 identified themselves as disabled (there were 1075 responses from a broad catchment within a 650m radius of the OA).

Due consideration of draft replacement London Plan (2010) policies 3A.14 (Protecting London's Diverse Population) and 4B.5: Inclusive Design set out the relevant London guidance to ensure appropriate provision is made for people with disabilities. LBHF and RBKC have also given consideration to the need to make the OA accessible for all disabled people.

### **Pregnancy and maternity**

The General Fertility Rate (GFR) (which denotes the number of live births per 1000 women aged 15-44) was 63.6 in Hammersmith and Fulham and 57.8 in Kensington and Chelsea in 2010, both lower than the London average of 72.1. The GFR for both Hammersmith and Fulham and Kensington and Chelsea are also both below the England average of 65.5.\*

**Religion and Belief including Non-Belief\*\***

	Popn 2001	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religions	No religion	not stated
<b>Hammersmith &amp; Fulham</b>	165,242	63.65%	0.77%	1.09%	0.79%	6.85%	0.19%	0.43%	17.64%	8.59%
<b>Kensington &amp; Chelsea</b>	158,919	61.96%	1.16%	1.00%	2.23%	8.41%	0.20%	0.57%	15.25%	9.20%

**Marriage\*\***

	Population 2001 over 16 years	Single (never married)	Married	Re-married	Separated (but still legally married)	Divorced	Widowed
<b>Hammersmith &amp; Fulham</b>	138,016	54.72%	26.00%	3.02%	2.81%	7.84%	5.60%
<b>Kensington &amp; Chelsea</b>	134,125	49.27%	28.78%	4.15%	2.93%	9.27%	5.59%

\*ONS 2010, birth registrations in the United Kingdom by area of usual residence of mother.

\*\*Census 2001 Key Statistics - Urban area summary results for local authorities KS07 Religion Coverage: England and Wales Description: Urban area summary results for local authorities

<b>Section 04</b>	<b>Assess or undertake consultation</b>
<b>Consultation</b>	<p><b>SPD Consultation</b></p> <p>Three separate stages of consultation have informed the drafting of the SPD. A preliminary consultation exercise was undertaken in late 2010 to inform the public and interested parties of the proposals for redevelopment and to determine and clarify issues. The second stage of consultation on the draft SPD was carried out between March and May 2011 and provided feedback on objectives and key principles of the SPD, along with general feedback on redevelopment of the Opportunity Area. The third stage of consultation was undertaken in November-December 2011 and provided further feedback on the objectives and key principles, along with general feedback on redevelopment of the Opportunity Area.</p>

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

### **Consultation Leaflet and Questionnaire**

In late October and early November 2010, a consultation leaflet and questionnaire entitled 'Earls Court and West Kensington Opportunity Area Joint Planning Framework – consultation leaflet' was distributed to all addresses within a 650m radius of the boundary of the OA within both LBHF and RBKC. A copy of the leaflet and questionnaire is provided in Appendix 1 to this report, and the area the consultation leaflet was distributed to is shown in Figure 2 below:

Copies of the leaflet and questionnaire were also available from the Baron's Court and Fulham Broadway libraries and the Earl's Court Exhibition Centre. The questionnaire was also published on both LBHF's and RBKC's websites and the consultation was also advertised in a media release and newspaper article. A total of 35,000 leaflets were distributed.

### **Questionnaire Responses and Analysis**

1075 completed questionnaires were received by the return deadline of Friday 12<sup>th</sup> November 2010. The vast majority of questionnaires (95%) were received from residents living within or near the OA. Of the 1075 completed questionnaires, 163 (15%) were received online.

Questionnaire data was collated by Abacus Data Entry Ltd and provided in spreadsheet format, and the statistical analysis of questionnaire data was carried out in Excel. The responses to the questions were presented in pie-graph form and discussed, and the results summarised by topic area. Written comments received were also collated and categorised by topic area in Excel and are appended. Discernible trends from the written comments have been summarised, although overall the written comments showed few clear trends.

### **Consultation Objectives**

Public consultation is not a statutory requirement during the preliminary stages of drafting an SPD. However, public consultation at an early stage ensures key issues are identified and community aspirations are considered in the drafting of the SPD:

This consultation exercise therefore had three key objectives:

1. To introduce and inform the community on the potential redevelopment of the OA;
2. Identify the key issues affecting the OA and the surrounding area;
3. Identify what changes the community would like to see through redevelopment of the OA.

With respect to Objectives 2 and 3, the questionnaire sought to find out what aspects of the OA and surrounding area respondents 'like' or 'would change' in relation to four topics, namely:

- Housing;

- Traffic, transport and movement;
- Economic, community and leisure facilities; and
- Urban design and architecture.

A number of specific questions were asked on each topic. For example, with respect to housing, respondents were asked whether they 'like' or 'would change' the current sense of community, the quality of existing housing and the range of housing types.

### **Respondent Profile**

The questionnaire asked respondents to provide demographic information, namely gender, age group, relationship to the OA (ie. resident or otherwise) and physical health. These questions helped establish in broad terms the respondent profile.

#### *-Gender*

569 (53%) of the 1075 questionnaire respondents were female, and 490 (46%) of respondents were male. 1% of respondents did not specify their gender.

#### *-Age Group*

The majority of respondents were in the 30 to 59 age group, with 650 (60%) in this group. The second largest was the 60 to 74 age group, with 232 (21%) in this group. The number of respondents within other age groups was insignificant by comparison. This may be significant in terms of developing the SPD, because the numbers of people under 15 are high (24% in Gibbs Green and West Kensington Estates). The numbers aged 18-34 are also high (44% in North End and Fulham Broadway wards).

#### *-Relationship to the OA*

Respondents were asked to state their relationship to the OA as:

- a resident;
- a local business employee;
- a visitor; or
- other.

Of the 1075 respondents to the questionnaire, 994 (95%) identified themselves as residents (note: this does not refer to residents of the OA itself, but rather residents within the wider LBHF and RBKC distribution catchment). Of the remainder, only 29 of the respondents were visitors (2%) and only four respondents (<1%) identified themselves as employees of local businesses.

#### *-Disabilities*

A total of 955 respondents (91%) stated that they did not have any disability, with 94 (9%) stating that they did have a

disability.

A small majority of the 1075 respondents were female, and the most represented age group in the survey was the 30 to 59 group followed by the 60 to 74 group, which collectively made up 81% of all respondents. Young people (younger than 16) were barely represented at all. The vast majority of respondents were residents (95%) and very few employees of local businesses responded. 9% of respondents have some form of disability although there was a significant non-response to this question amongst adults. There was no question asked on ethnicity.

### **Housing**

The strongest response to the housing questions was with regard to the current sense of community, with 46% of respondents stating they like the current sense of community in the area compared to 25% who would change the sense of community. Responses to questions regarding the quality and range of housing were less clear and there was no strong preference for change. A total of 72 comments were made specifically with regard to housing covering a vast array of issues and opinions, and there was a variety of views expressed regarding the provision of affordable housing and private housing.

### **Traffic, Transport and Movement**

Residents place high value on current opportunities to access London Underground services, West London Line services and bus services throughout the area, with the majority of respondents to these questions liking current opportunities for access. There is considerable dissatisfaction however at the amount of traffic in the area along with the impact of vehicles on the pedestrian environment, with 64% and 52% of respondents respectively wanting change in this respect. 47% of respondents would also like the cycle network and cycling facilities changed, although only 39% want change in terms of being able to walk through the area.

A total of 215 comments were received with respect to traffic, transport and movement. 148 comments were received with respect to roads, 27 with respect to public transport, 29 with respect to cycling, and 11 with respect to parking. In keeping with the questionnaire response, there were many comments expressing strong views about the current state of the roads, the high volume of traffic and the impact of traffic on the area. The large number of comments coupled with the questionnaire response on this topic was one of the more conclusive findings of the consultation.

### **Economy, Community and Leisure Facilities**

Community, health and leisure facilities and services in the area appear to be highly valued. This is particularly the case with respect to local libraries and health and dental facilities, with 49% and 50% respectively liking the current provision of services. North End Road Market is clearly a highly valued part of the area's retail offer with 54% of respondents liking it in its current form.

Respondents appear less satisfied with the current provision of community space and open space for recreation and children's play, with 43% and 35% respectively wanting change. Attitudes towards local job opportunities and business accommodation appear ambivalent with no clear outcome in response to these questions. This was also the case with

respect to school spaces. The cultural reputation of Exhibition Centres is clearly valued in the area, with only 20% of respondents wanting to see change in terms of their reputation. Overall, there was a large 'no response' to questions in this section.

202 comments were received with respect to economic, community and leisure facilities, 89 comments were received on social and community issues, 65 with respect to retail, 20 with respect to safety, 12 with respect to crime, 8 with respect to leisure facilities and 6 with respect to jobs. Many comments highlighted the current lack of open space and green space and the need for greater provision. Many comments were also received regarding the area's retail offer, and it is clear that although the North End Road Market is valued there is also a strong desire for it to be upgraded. Overall, comments were wide ranging with regard to economic, community and leisure facilities and there were few discernible trends.

### **Urban Design and Architecture**

Overall respondents generally like the current built environment within and surrounding the OA, including both existing buildings (40%) and the street layout (44%), although a fair proportion would also like change to the built environment and street layout (30% and 28% respectively).

A total of 193 comments were received with respect to urban design and architecture, 107 comments were received with respect to urban design, 75 with respect to the Earls Court Exhibition Centre and 10 with respect to the Empress State Building. There were many comments expressing opposition to more tall buildings in the area. The Earls Court Exhibition Centre is clearly valued with many comments both acknowledging its value and stating a desire for it to be retained. The small number of comments made with respect to the Empress State Building were largely in favour of it being retained.

### **Environment and Public Health**

Although there were no specific questions with regard to the environment and public health, there were many comments received on these and other related topics. A total of 26 comments were received with respect to public health, 14 with respect to pollution and construction impacts, 9 with respect to air quality, 6 with respect to green design, 5 with respect to run down environment, 5 with respect to waste, 2 with respect to water and 1 with respect to wildlife.

Most comments highlighted the run down state of the area and various poor environmental aspects, and the need for these to be addressed in any redevelopment.

### **Draft SPD Consultation – March to May 2011**

Consultation on the Draft SPD ran from Friday 11 March 2011 to 5pm on Tuesday 26 April 2011, although representations made after this date were accepted.

### Consultation Status

Consultation on the draft SPD was undertaken 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).

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.

### 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.

### **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 2011	14:30 to 18:30	The Westminster Suite, Earls Court Exhibition Centre, Warwick Road, SW5 9TA	14
Monday 21 March 2011	17:00 to 21:00	St Cuthberts Church Hall, 51 Philbeach Gardens, SW5 9EB	50
Saturday 26 March 2011	11:00 to 15:00	Holiday Inn Express, 295 North End Road, W14 9NS	18
Tuesday 29 March 2011	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,

### **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.

### **Consultation Outcome**

Hundreds of written responses were received on the Draft SPD from a wide range of respondents including MPs, 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 then 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.

The SPD team considered and responded to each comment and the comments and responses are set out in a detailed consultation schedule which has been published separately. A consultation summary report has also been prepared that summarises comments by SPD chapter and identifies themes and trends, especially where large numbers of comments were received on specific issues, and highlights where there was particular interest in certain topics. The consultation schedule and consultation summary report should be referred to for in-depth analysis of comments and officer responses, and is available from both RBKC and LBHF, and is also published on both local authority websites. The consultation responses have assisted in the redrafting of the SPD.

### **Revised Draft SPD Consultation November-December 2011**

Consultation on the Revised Draft SPD ran from Friday 11 November 2011 to 5pm on Friday 23 December 2011, although representations made after this date were accepted.

### **Consultation Status**

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) is programmed to take place for a 6 week period starting from Friday 11 November and ending at 5pm on Friday 23 December 2011.

### **Overview**

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

- Consultation letter delivered to 40,000 properties and mailed out to interested parties;
- Public notice in local newspapers;
- SPD Distribution to interested parties (both hardcopy and CD formats);
- Availability of the SPD for inspection at several public locations;
- 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
- Workshops with the Earl's Court Society and a presentation to estate residents.

Further details of the various consultation techniques are provided below:

### **Consultation Letter**

1,900 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 and a further 40,000 letters were distributed to properties within 600 metres of the Opportunity Area and within the Opportunity Area itself. The letter introduced the draft SPD and invited comments.

### **Public Notice**

A public notice was placed in the Kensington and Chelsea Chronicle and the Hammersmith and Fulham Chronicle on Friday 11 November 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.

### **SPD Distribution**

A hardcopy and/or CD of the revised draft SPD and all supporting information was sent to statutory organisations and

other selected interested parties. The revised draft SPD was also sent to people or organisations who requested copies.

Copies of the revised 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 revised 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 letter) 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).

#### **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.

#### **Workshops and Presentation**

In RBKC and as with the first round of consultation, the Earl's Court Society also requested, and offered to host, two planning workshops. The workshops were held in the St. Cuthbert's Church hall on the 29 November 2011, where general planning issues were discussed, and the 30 November 2011 where transport related issues were discussed. Nearly 100 residents from the local area attended the first workshop and nearly 40 people from the local area attended the second workshop. RBKC Council Planning Officers introduced the revised draft SPD and described how it would be used as a material planning consideration when determining planning applications in the Opportunity Area.

	<p>Attendees were asked “what elements of the Key Objectives and Key Principles they supported and which elements they would change” under each of the headings of the SPD. A summary of 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 revised draft SPD.</p> <p>In LBHF, officers presented the SPD to residents of the West Kensington and Gibbs Green estates in an event organised by Planning Aid. Officers can an overview of the chapters covered in the SPD, with a particular focus on the issues concerning estate redevelopment and encouraged residents of the estates to consider the key principles and key objectives in the SPD and send through any comments in response to the consultation.</p> <p><b>Consultation Outcome</b></p> <p>The authorities received hundreds of responses from a wide range of respondents including MPs, 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 3,817 separate comments. Each comment was then assigned to a specific chapter, section and/or key principle of the revised draft SPD.</p> <p>The SPD team considered and responded to each comment and the comments and responses are set out in a detailed consultation schedule which has been published separately. A consultation summary report has also been prepared that summarises comments by SPD chapter and identifies themes and trends, especially where large numbers of comments were received on specific issues, and highlights where there was particular interest in certain topics. The consultation schedule and consultation summary report should be referred to for in-depth analysis of comments and officer responses, and is available from both RBKC and LBHF, and is also published on both local authority websites. The consultation responses have assisted in the finalising of the SPD and tracked copies of each of the SPD chapters have been published separately, showing where the SPD has been revised in relation to comments made as part of the consultation on the revised draft SPD.</p>
<b>Assessment</b>	<p>Both consultation processes highlighted a number of issues in relation to equality strands. The key concern related to the potential redevelopment of the estates and the impact that this might have on the residents in terms of disruption as part of the construction and re-housing process. This is dealt with in Key Principle HO5, which requires any applicant’s phasing strategy to demonstrate mechanisms that will be deployed in order to minimise the impact of construction and disruption of re-housing on existing residents.</p> <p>Consultation highlighted the importance to the community of social infrastructure and health facilities, and the current lack of open space, green space and play space for children. This is addressed through policies: UF14, UF15, UF16, and UF18 (children and open / play space). It is also addressed through policy HO17 in terms of housing, and in policy SC4 in terms of sport and access to space for sport.</p> <p>Residents clearly place high value on current opportunities to access public transport services although there are still</p>

barriers to access at many locations. This will be partly addressed through policies TRN1, TRN2, which seek to determine which level of impact is acceptable. Policies TRN4, TRN5, TRN6, TRN7, TRN7 seek to deliver better footways and space on footways, and wayfinding for pedestrians. Policies TRN16, TRN10, TRN11, TRN12 seek to deliver better transport infrastructure. There is also considerable dissatisfaction at the amount of traffic in the area along with the impact of vehicles on the pedestrian environment, and many respondents would also like the cycle network and cycling facilities improved. This is addressed through policies TRN8 and TRN9. Accessibility issues around safety when crossing roads was also raised as an issue affecting specific age groups and those with disabilities. Para 10.74 of the Transport and Accessibility Strategy relates to the specific needs of Blue Badge holders. Safety is addressed through policy UF37, which aims to keep speed under 20mph through street design.

Section 05	Assessment of Impact and Outcomes									
<b>Assessment</b>	<p>This section assesses the Key Principles of the nine policy areas in the SPD against the nine protected characteristics. The seven policy areas of the SPD assessed are:</p> <ul style="list-style-type: none"> <li>▪ Urban Form;</li> <li>▪ Housing;</li> <li>▪ Transport and Accessibility;</li> <li>▪ Employment;</li> <li>▪ Retail;</li> <li>▪ Culture;</li> <li>▪ Social and Community Facilities</li> <li>▪ Environment; and</li> <li>▪ Energy;</li> </ul> <p>Each SPD policy area has been given a score which indicates whether it has a positive (+) or negative (-) impact on the nine protected groups, and also whether this is of low, medium or high relevance to each group. In some cases, for example where this is broadly indicated under Assessment of Objectives at the outset of this document, the policies contained within the SPD may not be applicable (N/A).</p>									
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4" style="text-align: center; padding: 5px;"><b>URBAN FORM STRATEGY</b></th> </tr> </thead> <tbody> <tr> <td style="width: 15%; padding: 5px;"><b>Age</b></td> <td style="width: 5%; padding: 5px; text-align: center;">+</td> <td style="width: 5%; padding: 5px;"><b>H</b></td> <td style="padding: 5px;">                     Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment that cater for people of all ages. The Key Objective of maximising connectivity seeks to ensure it is easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that are readily accessible to pedestrians and wheelchair users. It also promotes a layout that avoids clutter and creates safe and readily usable streets for all. The UFS also encourages streets as ‘places for people’ accommodating all users. 4.107 of UF36 will support this, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups with reduced mobility such as older people. Key Principles relating to open space seek to ensure that children can easily go out and play ensuring that at least 90% of all new residential buildings are no more than 100m away from an open space. UF37 seeks to use street design to keep speeds down, which will improve safety for older and younger people who may be more vulnerable than other pedestrians                 </td> </tr> </tbody> </table>			<b>URBAN FORM STRATEGY</b>				<b>Age</b>	+	<b>H</b>
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<b>Age</b>	+	<b>H</b>	Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment that cater for people of all ages. The Key Objective of maximising connectivity seeks to ensure it is easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that are readily accessible to pedestrians and wheelchair users. It also promotes a layout that avoids clutter and creates safe and readily usable streets for all. The UFS also encourages streets as ‘places for people’ accommodating all users. 4.107 of UF36 will support this, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups with reduced mobility such as older people. Key Principles relating to open space seek to ensure that children can easily go out and play ensuring that at least 90% of all new residential buildings are no more than 100m away from an open space. UF37 seeks to use street design to keep speeds down, which will improve safety for older and younger people who may be more vulnerable than other pedestrians							



	<b>Disability</b>	<b>+</b>	<b>H</b>	<p>Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment that has removed barriers for people with disabilities.</p> <p>Key Principles within the UFS promote movement for all people, and seek to ensure it is easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that are readily accessible, which will be of high relevance to disabled people. It also promotes a layout that avoids clutter and creates safe and readily usable streets for all. The UFS also encourages streets as 'places for people' accommodating all users. 4.107 of UF36 will be of direct benefit to disabled people, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2. UF37 seeks to use street design to keep speeds down, which will improve safety for disabled people with mobility impairments who are likely to be more vulnerable than other pedestrians</p>
	<b>Gender reassignment</b>	<b>N/A</b>	<b>N/A</b>	The UFS has not so far emerged as relevant people who have transitioned or are, transitioning and so is not relevant to this protected characteristic.
	<b>Marriage &amp; Civil Partnership</b>	<b>N/A</b>	<b>N/A</b>	The UFS is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
	<b>Pregnancy and maternity</b>	<b>+</b>	<b>H</b>	The UFS objective of maximising connectivity and related key principles promotes movement for all people, and seeks to ensure it's easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that is readily accessible to pedestrians and suitable for buggies and prams. 4.107 of UF36 will support this, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups with reduced mobility such as pregnant women. It also promotes a layout that avoids clutter and creates safe and easily accessible streets. Further, policies UF14, UF15, UF16, UF18 seek to provide play space and ensure dwellings are in specified proximity of these, which will be benefit to mothers with small infants as social spaces, and if they have other children, places for those children to play
	<b>Race</b>	<b>+</b>	<b>H</b>	<p>Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment accommodating and responding to the needs of all racial groups.</p> <p>Key principles UF1, 2, 3 and 4 of the UFS will reduce severance by better connecting communities through a new street network and blends the OA into the surrounding area by extending the existing street network. Key Principle UF3 Also proposes street environment that will encourage people to interact. Key Principles UF10 and UF11</p>

			require a variety of open and green spaces potentially meeting the needs of all groups and ethnicities are proposed. Further key principles promote vibrancy and activity at all times of day promoting interaction and a cultural destination and related uses at the heart of the site.
<b>Religion/belief (including non-belief)</b>	<b>+</b>	<b>M</b>	<p>Redevelopment of the OA in accordance with the UFS will deliver an integrated, inclusive urban environment accommodating a broad range of religious, faith and special interest groups.</p> <p>Key principles UF1, 2, 3 and 4 of the UFS seek to reduce severance by better connecting communities through a new street network and blends the OA into the surrounding area by extending the existing street network. Key Principle UF3 Also proposes street environment that will encourage people to interact. Key Principles UF10 and UF11 require a variety of open and green spaces potentially meeting the needs of all groups and ethnicities are proposed. Further key principles promote vibrancy and activity at all times of day promoting interaction and a cultural destination and related uses at the heart of the site.</p>
<b>Sex</b>	<b>+</b>	<b>H</b>	The UFS objective of maximising connectivity and related key principles promotes movement for all people, and seeks to ensure it is easy for people to navigate their way around the OA with promotion of a street hierarchy and network of open spaces that is readily accessible to pedestrians and suitable for buggies and prams, which will benefit men and women as parents. It also promotes a layout that avoids clutter and creates safe and easily accessible streets. 4.107 of UF36 will support this, as applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups who require aspects such as level access, including parents with buggies and prams. Further, policies UF14, UF15, UF16, UF18 seek to provide play space and ensure dwellings are in specified proximity of these, which will be benefit to mothers with small infants as social spaces, and if they have other children, places for those children to play
<b>Sexual Orientation</b>	<b>N/A</b>	<b>N/A</b>	The UFS is not seeking to deliver a service for lesbian, gay, bisexual, or heterosexual people and so is not relevant to this protected characteristic.

### Human Rights

It is not considered that the Urban Form Strategy will affect human rights.

### Children's Rights

It is considered that UF14, UF15, UF16, and UF18 will impact positively on Children's Rights, by addressing the issue of open / play space. In particular, these policies will help consider their best interests, their right to development, rights for disabled children, the right to leisure. 4.107 of UF36 will support children's movement about the built environment, as

applications will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, and accessibility for disabled people can have benefits for other groups with reduced mobility such as children, who may find barriers such as steps more difficult to navigate than adults. UF37, while not being specifically relevant to Children's Rights, will have a positive impact on children by reducing speeds and thereby increasing child safety.

**HOUSING STRATEGY**

Policy HO3 requires that an assessment of housing need would have to be carried out with any planning application to provide affordable housing in order to facilitate the re-provision of housing for the residents of the West Kensington and Gibbs Green estates. As this will depend on the market and need at the time, this has not been assessed below as it is not possible to do so at this time.

Policy HO4 requires 25% of all new housing on Seagrove Road site to be social rented. It is not yet possible to know which groups would be housed here, as it is too early in the process. Therefore, it has not been assessed here.

<p><b>Age</b></p>	<p>-</p>	<p><b>H</b></p>	<p>During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns were:</p> <ul style="list-style-type: none"> <li>• that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents;</li> <li>• that as part of the previous consultation strong opposition was raised 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;</li> <li>• that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation;</li> <li>• that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and 'discontinuous roads';</li> <li>• that the SPD relies on a fundamentally flawed 'Estates Regeneration Economic Appraisal'; and</li> <li>• that the SPD wrongly implies we are not a mixed and balanced community and uses this as another justification for demolition.</li> </ul> <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is</p>
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			<p>known from the profile of the estates and surrounding North End ward that there are substantial numbers of elderly residents who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and re-housing of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on older people, to whom the disruption caused by having to move home would be greater as a result of physical and mental stress, in terms of the removal process. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist elderly residents with the re-housing process.</p> <p>Key principles HO12 and HO14 require minimum proportions of family units, which will benefit younger people with children. Key Principle HO17 requires new homes to be carefully designed and laid out to have satisfactory access to outdoor amenity space. Family dwellings at ground level should have access to private open space. This will benefit younger people with families.</p>		
		+	L-H	Key Principle HO18 requires a minimum of 10% of residential units across both boroughs to be wheelchair accessible and Key Principle HO19 requires all residential units to be built to lifetime home standards.	
			+	L	Key Principle HO10 requires affordable housing as part of all applications for comprehensive development, which may be of more relevance to younger people who have built up less capital.
			+	L	Key principle HO8 sets our intermediate housing requirements and this may improve accommodation options for all age groups as it will set out a range of tenure types, which may be more suitable to those who have, or who have not yet, built up more capital due their age and length of time working to acquire capital.
			+	H	Key Principle HO15 specifically requires any comprehensive development to provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students which will be relevant to older and younger people.
		<b>Disability</b>	-	H	During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns

		+	H	<p>were:</p> <ul style="list-style-type: none"> <li>• that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents;</li> <li>• that as part of the previous consultation strong opposition was raised 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;</li> <li>• that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation;</li> <li>• that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and ‘discontinuous roads’;</li> <li>• that the SPD relies on a fundamentally flawed ‘Estates Regeneration Economic Appraisal’; and</li> <li>• that the SPD wrongly implies we are not a mixed and balanced community and uses this as another justification for demolition.</li> </ul> <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is known from the profile of the estates and surrounding North End ward that there are a proportion of disabled residents who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and decant of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on disabled people, who would be likely to find the removal process more stressful. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist disabled residents with the re-housing process.</p> <p>The Housing Strategy requires a minimum of 10% of residential units across both boroughs to be wheelchair accessible. It also states if estate regeneration were to occur priority should be the provision of wheelchair and adaptable accommodation to</p>
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				<p>meet needs arising from the Gibbs Green and West Kensington Housing Estates. Any top up provision should be spread evenly across tenures and across all extra care units. If estate regeneration were not to occur, the accessible units should be spread evenly across all tenures and all extra care units.</p> <p>Key Principle HO18 requires that a minimum of 10% of all new units are wheelchair accessible.</p> <p><b>+</b> <b>H</b> Key Principle HO15 specifically requires any comprehensive development to provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students. This may include disabled people.</p> <p><b>+</b> <b>H</b> Key Principle HO19 requires all residential units to be built to Lifetime Homes standards, which will be relevant to people who may become disabled as they get older and help them to stay in their own home for longer.</p>
	<b>Gender reassignment</b>	<b>N/A</b>	<b>N/A</b>	The Housing Strategy has not so far emerged as relevant to people who have transitioned or are transitioning.
	<b>Marriage and Civil Partnership</b>	<b>N/A</b>	<b>N/A</b>	The Housing Strategy is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
	<b>Pregnancy and maternity</b>	<b>-</b>	<b>H</b>	<p>During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns were:</p> <ul style="list-style-type: none"> <li>• that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents;</li> <li>• that as part of the previous consultation strong opposition was raised 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;</li> <li>• that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation;</li> <li>• that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and 'discontinuous roads';</li> <li>• that the SPD relies on a fundamentally flawed 'Estates Regeneration Economic Appraisal'; and</li> <li>• that the SPD wrongly implies we are not a mixed and balanced community and</li> </ul>

				<p>uses this as another justification for demolition.</p> <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is known from the profile of the estates and surrounding North End ward that there are substantial numbers of those that are pregnant or with babies and small children, who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and decant of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on those that are pregnant or with babies and small children, who would be likely to find the removal process more stressful and might also be more greatly impacted on through any nearby construction, in terms of noise disturbance. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist those that are pregnant or with babies and small children with the re-housing process. Special consideration would also need to be given to the construction impacts on those that are pregnant or with babies and small children.</p> <p>Key Principle HO19 of The Housing Strategy proposes all houses to be lifetime homes standards. This requires high standards of accessibility for all residential dwellings suitable for pregnant women and parents with babies and small children.</p>
	<b>Race</b>	-	<b>H</b>	<p>During the consultation on the revised draft SPD, 201 letters of objection were received from residents of the estates and surrounding streets. The key concerns were:</p> <ul style="list-style-type: none"> <li>• that development would unnecessarily destroy decent, well-loved homes and wreck a well-functioning community, damaging family ties, disrupting social networks and worrying elderly residents;</li> <li>• that as part of the previous consultation strong opposition was raised 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;</li> <li>• that the SPD portrays the community negatively by unfairly focusing exclusively on deprivation;</li> </ul>

				<ul style="list-style-type: none"> <li>• that the SPD uses spurious grounds to justify demolition such as the poverty of the occupants and ‘discontinuous roads’;</li> <li>• that the SPD relies on a fundamentally flawed ‘Estates Regeneration Economic Appraisal’; and</li> <li>• that the SPD wrongly implies we are not a mixed and balanced community and uses this as another justification for demolition.</li> </ul> <p>For the residents that raised these issues, it is clear that development in accordance with Key Principle HO1 of the SPD, which would lead to the re-housing of a large number of residents, would be considered to have a negative impact. The consultees have not identified if they fall within a particular protected characteristic; however it is known from the profile of the estates and surrounding North End ward that there are substantial numbers of ethnic minority residents who would be particularly impacted on by a comprehensive approach being taken to redevelopment of the OA that includes the West Kensington and Gibbs Green estates.</p> <p>Key Principle HO5 requires developers to demonstrate that the phasing and decant of the West Kensington and Gibbs Green estates will have minimal disruption to existing residents. Despite there being this requirement, it is recognised that any approach to decant of the estates would cause disruption to existing residents, which could have a particularly strong impact on ethnic minority groups, who would be likely to find the removal process stressful. The Phasing Strategy required under Key Principle HO5 will need to set out measures that not only minimise the impacts of re-housing, but also set in place measures that assist ethnic minority groups with the re-housing process.</p> <p>Key Principle HO2 requires all existing residents of the estates to be accommodated in new housing in the area if they desire along with no net loss in affordable housing. The Housing Strategy also requires the affordable housing mix to have regard to local need and strategic housing needs assessment. Affordable housing will also be tenure blind helping to achieve an integrated and balanced community.</p> <p>Key Principles HO6 and HO7 require the provision of affordable housing within LBHF and RBKC. Key Principle HO8 seeks to ensure a broad range of affordability within the intermediate housing tenure and Key Principle HO9 seeks to ensure that the affordable housing is spread evenly across the Opportunity Area, mixed with any market housing.</p> <p>The Housing Strategy also requires any comprehensive development to provide alternative housing types catering specifically for the needs of the elderly, vulnerable</p>
		+	L	
		+	L	
		+	L	



			groups and students.
<b>Sex</b>	<b>+</b>	<b>H</b>	Key principles HO12 and HO14 require minimum proportions of family units, which will benefit younger men and women with children. Key Principle HO17 requires new homes to be carefully designed and laid out to have satisfactory access to outdoor amenity space. Family dwellings at ground level should have access to private open space. This will benefit younger men and women with families.  Key Principle HO10 requires affordable housing as part of all applications for comprehensive development, which may be of more relevance to younger men and women who have built up less capital, and those who have one income, or whose combined income is not high.
<b>Sexual Orientation</b>	<b>N/A</b>	<b>N/A</b>	The Housing Strategy has not so far emerged as relevant to lesbian, gay, bisexual, or heterosexual people.
<b>Religion/belief (including non-belief)</b>	<b>N/A</b>	<b>N/A</b>	The Housing Strategy has not so far emerged as relevant to religious belief and non-belief.

### Human Rights

The SPD requires a phasing strategy to be submitted (Key Principle PS2) and this phasing strategy would need to demonstrate minimal disruption to estate residents (Key Principle HO5). Separately, the council's housing department would need to consult with estate residents before deciding to include the estates within any wider development proposals.

### Children's Rights

The Housing Strategy will have negative impacts in relation to estate redevelopment, where children would be likely to find the upheaval of any phased re-housing of residents more difficult. The Housing Strategy will have positive impacts through ensuring amenity space and private space is provided in conjunction with new housing, and ensuring accessibility for all. These key principles will help consider their best interests, their right to development, rights for disabled children and the right to leisure.

### TRANSPORT AND ACCESS STRATEGY

<b>Age</b>	<b>+</b>	<b>H</b>	Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved, crossings and footway widths improved and accessibility improvements for all. TRN6 requires environmental improvements and wider and clearer footways on streets surrounding the OA, which will assist movement and
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			accessibility for all. These will be of benefit to older people and those with small children, who may have limited mobility in comparison to other age groups. Key Principles TRN10, TRN11, and TRN12 require physical, accessibility, and other significant improvements to all three LUL stations (West Kensington, Earls Court and West Brompton) including re-opening a pedestrian tunnel. Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station, which will be of particular assistance to parents with babies and young children. TRN17 requires additional bus stops and coach parking, which may benefit all age groups in getting about.
<b>Disability</b>	<b>+</b>	<b>H</b>	Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved and crossings and footway widths improved. TRN4 and TRN6 requires the width and quality of the pedestrian environment to be improved on streets around the OA including crossings, and TRN7 and TRN22 require better pedestrian crossing, and the installation of new ones, all of which will better connect streets and improve legibility for disabled people with mobility impairment. Key Principle TRN10 requires accessibility improvements to all three LUL stations (West Kensington, Earls Court and West Brompton) and Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station. TRN24 requires blue badge parking for residents and visitors (in line with London Plan and local guidance), which is of benefit to disabled people.
<b>Gender reassignment</b>	<b>N/A</b>	<b>N/A</b>	The Transport and Access Strategy has not so far emerged as relevant to people who have transitioned or are transitioning.
<b>Marriage and Civil Partnership</b>	<b>N/A</b>	<b>N/A</b>	The Transport and Access Strategy is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
<b>Pregnancy and maternity</b>	<b>+</b>	<b>H</b>	Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved, crossings and footway widths improved and accessibility improvements for all. TRN6 requires environmental improvements and wider and clearer footways on streets surrounding the OA, which will assist movement and accessibility for pregnant women and those with small infants. Key Principles TRN10, TRN11, and TRN12 require physical, accessibility, and significant other improvements to all three LUL stations (West Kensington, Earls Court and West Brompton), including reopening a pedestrian tunnel, which will make moving about this area much easier for this group. Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station. which will be of particular assistance to pregnant women and those with babies and young children.
<b>Race</b>	<b>N/A</b>	<b>N/A</b>	The Transport and Accessibility Strategy has not so far emerged as relevant to race.
<b>Religion/belief</b>	<b>N/A</b>	<b>N/A</b>	Redevelopment of the OA in accordance with the Transport and Access Strategy will

<b>ef (including non-belief)</b>			<p>deliver an integrated, inclusive urban environment accommodating a broad range of religious, faith and special interest groups.</p> <p>The range of connectivity and accessibility improvements will reduce severance and better connect segregated communities through a new street network and blend the OA into the surrounding area by extending the existing street network</p>
<b>Sex</b>	<b>+</b>	<b>H</b>	<p>Key Principles TRN3 and TRN4 require north-south and east-west pedestrian movement to be improved, crossings and footway widths improved and accessibility improvements for all. TRN6 requires environmental improvements and wider and clearer footways on streets surrounding the OA, which will assist movement and accessibility for all. These will be of benefit to parents with small children, who may have limited mobility in comparison to other age groups. Key Principles TRN10, TRN11, and TRN12 require physical, accessibility, and other significant improvements to all three LUL stations (West Kensington, Earls Court and West Brompton) including re-opening a pedestrian tunnel. Key Principle TRN14 requires step-free access at West Brompton and West Kensington Station and any new entrance at Earl's Court Station, which will be of particular assistance to parents with babies and young children.</p>
<b>Sexual Orientation</b>	<b>N/A</b>	<b>N/A</b>	<p>The Transport and Access Strategy has not so far emerged as relevant to this protected characteristic</p>

### Human Rights

The Transport and Access Strategy is not expected to impact on human rights

### Children's Rights

The Transport and Accessibility Strategy will impact positively on Children's Rights in particular by ensuring connectivity and accessibility to open space and play space, safer and more accessible streets and safer access to schools and other educational facilities

### EMPLOYMENT STRATEGY

<b>Age</b>	<b>+</b>	<b>L to H</b>	<p>Key Principles ES4 and ES5 require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development. As such, these may be of relevance to Age in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage. As such it may be of various levels of relevance to different Age groups.</p>
	<b>+</b>	<b>H</b>	<p>Key Principle ES9 requires a local labour, skills and employment strategy and delivery plan that encourages full participation of the local labour force in employment. 6.62 of</p>

			the SPD outlines the expectation for opportunities for young people.
<b>Disability</b>	+	<b>L to H</b>	Key Principles ES4 and ES5 require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development. As such, these may be of relevance to Disability in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage. As such it may be of various levels of relevance to disabled people.
	+	<b>L to H</b>	Key Principle ES8 requires funding for workplace coordinators to encourage full participation of the local labour force in employment. Disabled people face particular barriers in gaining access to employment, and the strategy encourages employment across all groups (see para 6.23).
<b>Gender reassignment</b>	+	<b>L</b>	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as particularly relevant people who have transitioned or are transitioning, although this group does have workplace protection and the overall aims and benefits may have a positive impact.
<b>Marriage and Civil Partnership</b>	+	<b>L</b>	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as relevant to married people or people who are civil partners although this group does have workplace protection and the overall aims and benefits may have a positive impact.
<b>Pregnancy maternity</b>	+	<b>L</b>	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The key objective and all related key principles of the Employment Strategy will encourage participation in the workforce by pregnant women and child caregivers and so the overall aims and benefits may have a positive impact.
<b>Race</b>	+	<b>L to H</b>	The OA and surrounding area features a diverse range of shops, businesses and office based activities, many of which are owned or managed by local residents from a diverse range of ethnicities. As such, Key Principles ES4 and ES5, which require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development are likely to be of benefit to a wide range of race groups. These may be of relevance to race groups in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage.
	+	<b>H</b>	The Key Objective of the Employment Strategy is to increase employment opportunities for local people by creating a minimum of 7000 new jobs and improving access to training initiatives and apprenticeships. Development proposals for office floorspace to incorporate variety in the type, size, cost and terms (lease agreements)

			<p>and be designed to be readily adaptable for use by a range of tenants. Provision of office space for small and very small businesses and incubator units should meet borough level demand. Key Principle ES1 requires existing floorspace to be renewed and modernised to maintain and intensify existing employment provision.</p> <p>Key Principle ES8 requires funding for workplace coordinators to encourage full participation of the local labour force in employment.</p>
<b>Religion/belief (including non-belief)</b>	+	L	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as relevant to married people or people who are civil partners although this group does have workplace protection and the overall aims and benefits may have a positive impact.
<b>Sex</b>			Both boroughs have large numbers of households occupied by single people of working age. RBKC has the third highest proportion in England and Wales at 33.5 per cent. Hammersmith and Fulham is ranked eighth in England and Wales at 27.4 per cent. Around a fifth of households in RBKC and Hammersmith and Fulham are households with dependent children. Of these households, Hammersmith and Fulham is the borough with higher numbers of lone parents, two percent higher than RBKC which has similar proportions to Westminster. Based on 2011 census data, this equates to 9% that are male lone parents and 91% that are female lone parents in H&F. All are lower than the London average but London is comparatively high to England.
	+	H	As such, Key Principle EDS9 is of relevance to men and women but particularly to women, as it requires a local labour, skills and employment strategy and delivery plan that encourages full participation of the local labour force in employment.
	+	L to H	<p>Key Principle ES8 requires funding for workplace coordinators to encourage full participation of the local labour force in employment.</p> <p>Key Principles ES4 and ES5 require adaptable, affordable space for very small, small, and medium sized enterprises across all phases of development. As such, these may be of relevance to Sex in terms of those who lease the spaces, or receive a service from it, although it will not be possible to determine that this at this stage. As such it may be of various levels of relevance to men and women.</p>
<b>Sexual Orientation</b>	+	L	The Employment Strategy is focussed on providing jobs for local people and is inclusive by nature. The Employment Strategy has not so far emerged as relevant to lesbian, gay, bisexual, or heterosexual people although this group does have workplace protection and the overall aims and benefits may have a positive impact

**Human Rights**

The Employment Strategy is not expected to impact on human rights

**Children's Rights**

The Employment Strategy is not expected to impact on Children's Rights

**RETAIL STRATEGY**

Aside from issues to do with Accessibility (UFS and TRN policies), and RS8 (below), the policies of the Retail Strategy have not emerged as particularly relevant to any group in particular. Key Principles RS2, RS4 require that retail is 'day to day', and RS3 requires retail to have a minimum impact on surrounding and residents. RS5 sets out that S106 processes will control the scale, nature and character of the retail in this area. RS7 sets aside a number of small affordable units for essential retailers, which may be of benefit to one or more groups, though it is too early to determine which these are

<b>Age</b>	<b>+</b>	<b>L</b>	RS8 provides for keeping North End Market. Given the high numbers of young people in this area, this will be overall of low relevance as it will still be there but keeping it will be positive.
<b>Disability</b>	<b>+</b>	<b>H</b>	The Retail Strategy, in accordance with the objectives of the UFS and the Transport and Accessibility Strategy stipulates that any new retail offer must be accessible to all, which will be of high relevance to disabled people with limited mobility.
<b>Gender reassignment</b>	<b>N/A</b>	<b>N/A</b>	The Retail Strategy has not so far emerged as relevant to people who have transitioned or are transitioning and so is not relevant to this protected characteristic.
<b>Marriage and Civil Partnership</b>	<b>N/A</b>	<b>N/A</b>	The Retail Strategy is not seeking to deliver a service for married people or people who are civil partners and so is not relevant to this protected characteristic.
<b>Pregnancy maternity</b>	<b>+</b>	<b>H</b>	The Retail Strategy, in accordance with the objectives of the UFS and the Transport and Accessibility Strategy stipulates that any new retail offer must be accessible to all., which will be of high relevance to pregnant women and those with small infants who may have limited mobility
<b>Race</b>	<b>+/-</b>	<b>H</b>	The first key objective of the Retail Strategy partly relates to extending Fulham Town Centre north along North End Road, which features an ethnically diverse mix of shops and businesses. The second key objective of the Retail Strategy is to meet the day to day needs of the new resident and worker population. This objective is inclusive by nature and does not discriminate against race.  Key Principle RS8 and relates to the North End Road Market and the requirement that it be relocated and upgraded and/or maintained. It currently features a diverse ethnic mix of both traders and shoppers and the retail strategy seeks to preserve this

			diversity. Any decision to move the market would need to undergo a separate EQIA, which would need to examine any potential impacts on market traders in more detail. Nevertheless, it is recognised that any approach to the relocation of the market would cause disruption to market traders, which could have a particularly strong impact on ethnic minority groups.
<b>Religion/belief (including non-belief)</b>	<b>+</b>	<b>M</b>	The Retail Strategy has not so far emerged as relevant to religious belief and non-belief.
<b>Sex</b>	<b>+</b>	<b>H</b>	The Retail Strategy, in accordance with the objectives of the UFS and the Transport and Accessibility Strategy stipulates that any new retail offer must be accessible to all., which will be of high relevance to parents with young children and small infants who may have limited mobility
<b>Sexual Orientation</b>	<b>N/A</b>	<b>N/A</b>	The Retail Strategy has not so far emerged as relevant to this protected characteristic

#### Human Rights

The Retail Strategy is not expected to impact upon human rights. Any decision to move the market would need to undergo a separate EQIA, which would need to examine any potential impacts on market traders in more detail.

#### Children's Rights

The Retail Strategy is not expected to impact upon children's rights

#### CULTURE STRATEGY

Any comprehensive redevelopment will need at least one cultural facility (CS1 and CS2). CS3 provides for affordable artists' studios which may have a benefit across any of the groups below, but it is not possible to be more specific at this stage as it depends on who applies for those at the time.

<b>Age</b>	<b>+</b>	<b>H</b>	A key objective of the Culture Strategy is to create a lively cultural destination with a variety of culture, arts and creative facilities that continues the 'Earl's Court' brand. The objective is inclusive by nature and will accommodate all age groups.
<b>Disability</b>	<b>+</b>	<b>H</b>	Access to new cultural destinations and facilities will be in accordance with the key principles of the UFS and Transport and Access Strategy with regard to accessibility and will provide access for all. CS10 stipulates that at least 10% of hotel bedrooms should be accessible. These will have a positive impact on disabled people with limited mobility
<b>Gender reassignment</b>	<b>N/A</b>	<b>N/A</b>	The Culture Strategy has not so far emerged as relevant to people who have transitioned or are transitioning.

<b>nt</b>			
<b>Marriage and Civil Partnership</b>	<b>N/A</b>	<b>N/A</b>	The Culture Strategy is not seeking to deliver a service for married people or civil partners and so is not relevant to this protected characteristic
<b>Pregnancy and maternity</b>	<b>+</b>	<b>M</b>	Access to new cultural destinations and facilities will be in accordance with the key principles of the UFS and Transport and Access Strategy with regard to accessibility and will provide access for all. These will have a positive impact on pregnant women and those with small infants as moving around will be made easier.
<b>Race</b>	<b>+</b>	<b>M</b>	A key objective of the Culture Strategy is to create a lively cultural destination with a variety of culture, arts and creative facilities that continues the 'Earl's Court' brand. The Culture Strategy is inclusive by nature and will allow various cultural and religious groups within and surrounding the Opportunity Area to express themselves.  Key Principle CS1 requires a new cultural destination that provides a range of cultural, artistic and creative facilities which will be inclusive of all races and cultures.
<b>Religion/belief (including non-belief)</b>	<b>+</b>	<b>M</b>	A key objective of the Culture Strategy is to create a lively cultural destination with a variety of culture, arts and creative facilities that continues the 'Earl's Court' brand. The Culture Strategy is inclusive in keeping with the key objective and will allow cultural and religious groups within and surrounding the Opportunity Area to express themselves.
<b>Sex</b>	<b>+</b>	<b>L</b>	During consultation and development, no aspects of the Culture Strategy have been identified as of relevance to men or to women in particular. It is considered that the Culture Strategy is inclusive by nature in keeping with the key objective of creating a lively cultural destination with a variety of culture, arts and creative facilities.
<b>Sexual Orientation</b>	<b>+</b>	<b>L</b>	During consultation and development, no aspects of the Culture Strategy have been identified as of relevance to sexual orientation. It is considered that the Culture Strategy is inclusive by nature in accordance with the key objective

#### **Human Rights**

The Culture Strategy is not expected to impact upon human rights

#### **Children's Rights**

The Culture Strategy is expected to positively impact upon children's rights, particularly Key Principles CS1, CS2 and CS4 which will provide opportunities and encourage children to become involved in artistic and cultural activities, upholding their rights to education, leisure, and the arts.

### **SOCIAL AND COMMUNITY FACILITIES STRATEGY**



	<b>Age</b>	-	<b>M</b>	The relocation of estate residents may mean that despite new facilities being provided within the OA, they may need to travel further to their new social and community facilities than they are to their existing social and community facilities. This would particularly impact on elderly residents.
	<b>Disability</b>	+	<b>M</b>	Key Principle SC2 requires redevelopment to provide an accessible health facility to be located in an easily accessible location for all residents within the OA. All health and community facilities are expected to be accessible to all in keeping with the UFS and Transport and Access Strategies. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
		+/-	<b>M</b>	The relocation of estate residents may mean that despite new facilities being provided within the OA, they may need to travel further to their new social and community facilities than they are to their existing social and community facilities. This would particularly impact on those with disabilities. The SPD requires all social and community facilities to be fully accessible and this may result in an improvement to disabled residents access to social and community facilities.
	<b>Gender reassignment</b>	+	<b>L</b>	The Social and Community Facilities Strategy requires at SC2 that a health facility is provided, which may have a positive impact on those who are or who have transitioned, albeit that those who are transitioning are likely to require specialist services which are already provided in (west) London. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
	<b>Marriage and Civil Partnership</b>	N/A	N/A	The Social and Community Facilities Strategy is not seeking to deliver a service for married people or civil partners and so is not relevant to this protected characteristic
	<b>Pregnancy and maternity</b>	+	<b>M</b>	Key Principle SC2 requires redevelopment to provide a health facility to be located in an easily accessible location for all residents within the OA, which would benefit expectant and post natal women. All health and community facilities are expected to be accessible to all in keeping with the UFS and Transport and Access Strategy. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and community facilities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
-		<b>M</b>	The relocation of estate residents may mean that despite new facilities being provided	

				within the OA, they may need to travel further to their new social and community facilities than they are to their existing social and community facilities. This would particularly impact on those who are pregnant or with babies or small children.
	<b>Religion/belief (including non-belief)</b>	<b>+</b>	<b>M</b>	Key Principle SC6 requires development to provide a community hub of 4,500m2 GIA. This new community hub should have a library on the ground and possibly first floors, with the remainder of the building providing affordable and flexible office, training and meeting space, adult learning and training space and halls for hire for use by the voluntary sector and residents. the facility would be available for use by all religious groups, which has been further clarified in the final SPD. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
	<b>Race</b>	<b>+</b>	<b>M</b>	<p>The Key Objective of the Social and Community Facilities Strategy is to provide social and community facilities that support the new residential and worker population.</p> <p>Publicly accessible open space needs to fulfil a variety of functions to cater for a range of groups and uses, including the provision of playing pitches, children's play, court games passive recreation and nature conservation.</p> <p>Key Principle SC3 requires redevelopment to provide a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population catering for a variety of incomes (including those from lower socio-economic groups such as minority ethnic groups). A proportion of affordable sports and leisure provision will need to be secured in this respect.</p> <p>Key Principle SC6 requires development to provide a community hub of 4,500m2 GIA. This new community hub should have a library on the ground and possibly first floors, with the remainder of the building providing affordable and flexible office, training and meeting space, adult learning and training space and halls for hire for use by the voluntary sector and residents.</p> <p>Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.</p>
	<b>Sex</b>	<b>+</b>	<b>H</b>	The Social and Communities Facilities Strategy is inclusive by nature and gender neutral. Key Principle SC3 requires any applications in the OA to submit a Health

			Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.
<b>Sexual Orientation</b>	<b>+</b>	<b>L</b>	The Social and Community Facilities Strategy requires at SC2 that a health facility is provided, which may have a positive impact on lesbian, gay, bisexual, heterosexual people in terms of their health, although there is already (for example) sexual health services provided in (west) London. Key Principle SC3 requires any applications in the OA to submit a Health Impact Assessment, which would be required to assess specific impacts on minority groups. All social and communities sought within the Social and Community Facilities Strategy will be required to be accessible to all.

**Human Rights**

The Social and Communities Facilities Strategy is expected to positively impact upon human rights (Article 2 of Protocol 2: right to education)

**Children’s Rights**

The Social and Communities Facilities Strategy is expected to positively impact upon children’s rights. Key Principle SC1 requires any redevelopment to be assessed against both RBKC and LBHF child yield formulas and the outcomes should be used in order to provide the relevant educational (nursery, primary and secondary) capacity in order to cater for the future child population. This may involve both expansion of existing facilities or provision of new education facilities. This will uphold their right to education. The relocation of estate residents may mean that despite new educational facilities being provided within the OA, they may need to travel further to their new educational facility than they are to their existing educational facility.

The UFS requires the overall quantity of public open green open space to have regard to the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation. Ideally all residential properties should be within 100m of an area of publically accessible green open space. Key Principle SIS8 also requires publically accessible green open space to fulfil a number of functions including the provision of playing pitches, children’s play, court games, passive recreation and nature conservation. These will uphold their rights to health and leisure.

<b>ENERGY STRATEGY AND ENVIRONMENT STRATEGY*</b>			
<b>Age</b>	<b>+</b>	<b>M</b>	The Energy Strategy requires implementation of a decentralised energy system and associated heat network to be implemented for the development and an energy centre established during phase 1 of development. The energy centre (or centres) need to meet the needs of subsequent phases of development with the potential to meet the

			<p>needs of the surrounding area in the future. The heat network will be connected to all households regardless of tenure.</p> <p>Sustainability measures including home energy efficiency measures, waste minimisation, site remediation, measures to encourage biodiversity and mitigate flood risk will all be implemented across the site on a tenure blind basis.</p>
<b>Disability</b>	<b>+</b>	<b>L</b>	Green spaces and sites of nature conservation will be accessible to all where practically possible.
<b>Gender reassignment</b>	<b>N/A</b>	<b>N/A</b>	Neither the Energy Strategy or Environment Strategy have so far emerged as relevant people who have transitioned or are transitioning
<b>Marriage and Civil Partnership</b>	<b>N/A</b>	<b>N/A</b>	Neither the Energy Strategy or Environment Strategy are seeking to deliver a service for married people or civil partners and so is not relevant to this protected characteristic
<b>Pregnancy maternity</b>	<b>N/A</b>	<b>N/A</b>	Neither the Energy Strategy or Environment Strategy have so far emerged as relevant to this protected characteristic
<b>Religion/belief</b>	<b>N/A</b>	<b>N/A</b>	The Energy Strategy and Environment Strategy have not so far emerged as relevant to this protected characteristic
<b>Race</b>	<b>+</b>	<b>M</b>	<p>All measures in the Energy Strategy and Environment Strategy are inclusive by nature.</p> <p>Key Principle ENE2 of the Energy Strategy requires implementation of a decentralised energy system and associated heat network and an energy centre established during phase 1 of development. The energy centre (or centres) need to meet the needs of subsequent phases of development with the potential to meet the needs of the surrounding area in the future. The heat network will be connected to all households regardless of tenure.</p> <p>Sustainability measures including home energy efficiency measures, waste minimisation, site remediation, measures to encourage biodiversity and mitigate flood risk will all be implemented across the site on a tenure blind basis.</p>
<b>Sex</b>	<b>+</b>	<b>M</b>	<p>All measures in the Energy Strategy and Environment Strategy are inclusive by nature.</p> <p>Key Principle ENE2 of the Energy Strategy requires implementation of a decentralised energy system and associated heat network and an energy centre established during phase 1 of development. The energy centre (or centres) need to meet the needs of subsequent phases of development with the potential to meet the needs of the surrounding area in the future. The heat network will be connected to all households regardless of tenure.</p>

				Sustainability measures including home energy efficiency measures, waste minimisation, site remediation, measures to encourage biodiversity and mitigate flood risk will all be implemented across the site on a tenure blind basis.
	<b>Sexual Orientation</b>	<b>N/A</b>	<b>N/A</b>	The Energy Strategy and Environment Strategy have not so far emerged as relevant to this protected characteristic
<p><b>Human Rights</b> The Energy Strategy and Environment Strategy are not expected to impact upon human rights.</p> <p><b>Children's Rights</b> The Energy Strategy and Environment Strategy are not expected to impact upon children's rights.</p> <p>*Although the Energy Strategy and Environment Strategy appear separately in the SPD they are considered together in the EIA to avoid repetition in assessment</p>				

<b>Section 06</b>	<b>Reducing any Adverse Impacts</b>
<b>Outcome of Assessment</b>	<p data-bbox="584 312 2051 408"><b>Outcome and Recommendations</b></p> <p data-bbox="584 312 2051 408">The previous draft of the EQIA identified a number of outcomes and recommendations that should be considered when finalising the SPD. These are set out below and followed by a description of how the revising of the SPD has tried to address these recommendations.</p> <ul data-bbox="636 448 2051 611" style="list-style-type: none"> <li data-bbox="636 448 2051 611">▪ The Urban Form Strategy promotes movement for all people however Key Principles in relation to Connectivity and Streets could go further and require specific measures to ensure the OA is accessible to those with disabilities, including elderly people, blind people and wheelchair users. The application of the UFS would also positively impact on those with small children and who have caring responsibilities. This is more likely to be women than men.</li> </ul> <p data-bbox="680 651 2029 746"><i>ACTION: The SPD now references Policy 7.2 of the Mayor’s London Plan (An Inclusive Environment) in the Policy Context for the Urban Form Strategy. This is covered by a higher order policy and it is not felt necessary to replicate this high order policy as a new Key Principle in the SPD.</i></p> <ul data-bbox="636 786 2051 1018" style="list-style-type: none"> <li data-bbox="636 786 2051 1018">▪ Although many Key Principles of the Urban Form Strategy relate to aspects of secure by design, there is no key principle that underpins it and requires it to be incorporated into the design of buildings and public space. Policy 7.3 of the London Plan ‘Designing out Crime’ requires Boroughs to seek to create safe, secure and appropriately accessible environments where crime and disorder and fear of crime so not undermine quality of life or community cohesion. It is therefore recommended that a key principle or set of key principles are included within the Urban Form Strategy to ensure safety and security for all people is fundamental to the redevelopment of the OA.</li> </ul> <p data-bbox="680 1058 2029 1153"><i>ACTION: Policy 7.3 has now been referenced in the Policy Context Section for the Urban Form Strategy. This is covered by a higher order policy and it is not felt necessary to replicate this high order policy as a new Key Principle in the SPD.</i></p> <ul data-bbox="636 1193 2051 1329" style="list-style-type: none"> <li data-bbox="636 1193 2051 1329">▪ The Retail Strategy incorporates a number of Key Principles that will positively impact on all equality strands. In addition to Key Principle RS8, there is a need to protect and further promote the vibrant mix of retailers and traders associated with any upgrade of the North End Road Market, and to ensure local ethnic and minority groups are fully represented and diversity is encouraged.</li> </ul> <p data-bbox="680 1361 2051 1457"><i>ACTION: Any decision to move the market would need to undergo a separate EQIA, which would need to consider any impacts on ethnic and minority groups. No change to the SPD is therefore proposed, which is simply asking any developer to allocate land for the market’s potential relocation.</i></p>

- The Cultural Strategy could better target local ethnic minority groups whose needs should be assessed as part of any consultation on the SPD.

**ACTION:** No change to the SPD proposed. The SPD is only seeking to allocate land for the use as cultural facilities. The occupation of these facilities would be dealt with as part of any detailed planning application and the SPD cannot restrict the occupancy of any cultural facilities at this stage.

- The Social and Community Facilities Strategy is inclusive of all races and ethnic groups, however health, education, and community facilities should be designed to accommodate the specific needs of identified local groups along with the needs of future residents.

**ACTION:** The health and education facilities sought in the SPD would be run by the council and PCT respectively and both have a statutory duty to meet the specific needs of the borough's residents. The supporting text for Key Principle SC6 identifies that the premises should be accessible to all. The Key Principle has also been amended to specify that space should be provided for multi-faith groups.

- Aside from identifying the need to provide social and community facilities (e.g. schools, community facilities, primary care facilities and open space), it is unclear what measures in the Social and Community Facilities Strategy are proposed to encourage the establishment of community organisations and strengthen existing organisations. A needs assessment of community groups within the OA and surrounding areas is recommended. This should identify requirements in terms of necessary support structures and facilities to enable them to establish and flourish within the OA.

**ACTION:** Further text has been added to Key Principle SC6 stating that provision must be made of new community space before any existing community space is demolished. The SPD can only require developers to mitigate against the impacts of their development. The SPD cannot require any developer to provide for the existing needs of surrounding community facilities.

- Childhood obesity has been identified as an issue in primary school children within London and although there is clear guidance on play space and open space within both the Urban Form Strategy and Social and Community Facilities Strategy, it is unclear the extent to which playing fields and open space suitable for active recreation will be accommodated in the proposed 2ha green space. Further investigation and accommodation of active recreation areas needs to be specified.

**ACTION:** Key Principle SC4 requires affordable access to any sports and leisure provision. Key Principle UF11 requires development to deliver public open spaces that provide for a range of different leisure pursuits, including sports pitches, children's play and court games. Given that the 2 ha open space would be the most significant open space required of any development, it is anticipated that this space would

	<p>need to provide for a wide variety of leisure pursuits.</p> <ul style="list-style-type: none"> <li>Community facilities should be provided so they are accessible to groups of all faiths and beliefs, and the provision of a multi-faith facility should be investigated.</li> </ul> <p><b>ACTION:</b> Key Principle SC6 has been amended to include the provision of multi-faith space.</p>
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Section 07	Action Plan				
<b>Action Plan</b>	<p>The below table identifies that issues and actions identified in the previous draft of the EQIA and the final column identifies whether these actions were undertaken and the outcomes of these actions.</p>				



	be specifically assessed and addressed through the SPD.	specific age groups in the statutory consultation exercise to ensure as much feedback is received as possible.		late 2011.	March-April 2011 consultation. HAFAD were again asked if they wished to have the SPD presented during the November-December consultation, but declined. HAFAD sent representations through on the SPD, which were considered along with all other representations.

Section 08	Agreement, Publication and Monitoring		
<b>Chief Officer sign-off</b>	For LBHF: <b>Name: Nigel Pallace</b> Position: Director Transportation and Technical Services <b>Email: <a href="mailto:nigel.pallace@lbhf.gov.uk">nigel.pallace@lbhf.gov.uk</a></b>  Telephone No: 020 8753 300	For RBKC: <b>Name: Jonathan Bore</b> Position: Executive Director for Planning and Borough Development <b>Email: <a href="mailto:jonathan.bore@rbkc.gov.uk">jonathan.bore@rbkc.gov.uk</a></b>  Telephone No: 020 7361 2075	For GLA: <b>Name: Colin Wilson</b> Position: Senior Strategic Planning Manager <b>Email: <a href="mailto:colin.wilson@london.gov.uk">colin.wilson@london.gov.uk</a></b>  Telephone No: 020 7983 4783
<b>Key Decision Report</b>	<p>RBKC: Equalities Impact Assessment considered on [TO ADD] by the Cabinet Member for Planning as part of the Key Decision Report for the adoption of the SPD.</p> <p>LBHF: Date of report to Full Council: 19<sup>th</sup> March 2012. Resolution for adoption to be considered at Cabinet / Full Council.</p> <p>Confirmation that key equalities issues found here have been included: Yes</p>		
<b>Opportunities Manager</b>	(When EIAs have been determined to be of high relevance) Name: Carly Fry Position: Opportunities Manager Email: <a href="mailto:PEIA@lbhf.gov.uk">PEIA@lbhf.gov.uk</a> Telephone No: 020 8753 3430 Date: 07 February 2012		



**London Borough of Hammersmith and Fulham**

# **Proposed Estates Regeneration: Economic Appraisal - Response to Comments**

Report

3rd February 2012

## London Borough of Hammersmith and Fulham

# Proposed Estates Regeneration: Economic Appraisal - Response to Comments

## Report

**3rd February 2012**

Reviewed and approved by: Signature(s):	
Name(s):	Graham Russell
Job Title(s):	Partner Director
Date:	3 February 2012

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## 1 Introduction

AMION Consulting, in conjunction with Jones Lang LaSalle (JLL), prepared an Economic Appraisal Report to assist the London Borough of Hammersmith and Fulham in considering the possible inclusion of the West Kensington and Gibbs Green estates within a comprehensive phased scheme of regeneration for the Earl's Court and West Kensington Opportunity Area. The Economic Appraisal was an accompanying document to the revised Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document (November, 2011).

This report sets out a response to the comments from West Kensington & Gibbs Green Community Homes and the West Kensington & Gibbs Green Tenants and Residents Associations (WK & GG Community Homes and WK & GG TRAs) on the Economic Appraisal report. The response within this report is focused on the concluding comments from the WK & GG Community Homes and WK & GG TRAs, which state that the Economic Appraisal suffers from:

- “a lack of detail and evidence for its conclusions, which appear to be based on a plethora of subjective opinions masquerading as ‘facts’;
- an obvious ignorance of the character of the estates and the published aspirations of their occupants;
- a lack of transparency about how the figures are arrived at and a failure to properly define ambiguous terms;
- an irrational justification for demolition based on spurious grounds; and
- a failure to fairly and properly assesses the residents’ community transfer option.”

Each of these comments is dealt with in turn below. A full response to all of the comments received from the WK & GG Community Homes and WK & GG TRAs has been submitted separately.

In considering the comments from WK & GG Community Homes and WK & GG TRAs, the purpose and scope of the Economic Appraisal should be borne in mind. It is not intended to be an assessment of the impacts of the redevelopment on the two estates alone. Rather, its focus is on assessing the **economic** costs and benefits to the boroughs of Hammersmith and Fulham and Kensington and Chelsea of the inclusion or not of the estates within the proposed comprehensive regeneration scheme for the Opportunity Area.

## 2 Response to comments

### 2.1 Lack of detail and evidence

The Economic Appraisal is based upon a thorough review and analysis. It comprises a clear and logical assessment of the gross and net additional impacts of five alternative options, drawing on a range of evidence including socio-economic data, economic and financial modeling and market assessments. The report has been produced in line with HM Treasury's Green Book,

which indicates that all spending proposals should be accompanied by a proportionate and well structured appraisal.

An assessment of phasing, demand and viability in relation to each option has been carried out as part of the Economic Appraisal. In addition, appropriate management and maintenance of the stock forms part of each of the options appraised. The management and maintenance costs of the options have been considered and are included within the assessment of the net present value.

The assessment of the net additional benefits includes specific consideration of leakage, displacement, multiplier and deadweight effects for each of the options and has been informed by various analyses, as well as recognised data sources and guidance (for example, the Department for Business Innovation and Skills' guidance on assessing additionality). In doing so, for example, the potential for permanent job losses under each of the alternative options has also been considered (through the assessment of displacement and deadweight).

## 2.2 Ignorance of the estates and aspirations of occupants

The Economic Appraisal was informed by a number of site visits and various contextual analyses, including socio-economic data, market assessments and development appraisals. The condition of the estates was considered as part of the Economic Appraisal. For example, it informed the analysis of future costs.

The results of the Council's consultations were also reviewed as part of the Economic Appraisal. The Council has been consulting extensively with residents of the estates over the past two years in order to understand the issues and concerns that they may have over the inclusion of the estates as part of comprehensive redevelopment of the Earl's Court and West Kensington Opportunity Area.

The Economic Appraisal has had regard to the various proposals (including those of local residents) for the area.

## 2.3 Lack of transparency

The Economic Appraisal presents the key assumptions and results of the analyses. Technical terms, such as those associated with additionality, are defined in the document. The additionality assumptions are explicitly identified so that the gross to net additional adjustment is clear.

The Report was informed by socio-economic analysis which was based on published Lower Layer Super Output Area data, together with information contained in a Council document (West Kensington and Gibbs Green Estates profiles).

## 2.4 Irrational justification for demolition

The Economic Appraisal indicates that there is a rationale for 'regeneration'. Many regeneration schemes involve redevelopment. Therefore the use of the word regeneration is

considered appropriate. Demolition of the estates would only be undertaken as part of a phased re-provision of homes and hence regeneration.

The identification of the comprehensive redevelopment scheme for the Opportunity Area as the best option is based on a clear analysis of the economic case. The Economic Appraisal does not seek to justify the regeneration of the estates purely on the grounds of poor physical and/or social condition. Rather, the Appraisal assesses the overall net additional benefits to the two boroughs of the inclusion or not of the estates within the proposed comprehensive regeneration scheme for the Opportunity Area.

The Council acknowledges that Decent Homes Funds have been spent on the estates and this is accounted for in estimates of future maintenance and management costs. This is one of a range of considerations included within the Economic Appraisal.

The comprehensive redevelopment of the Opportunity Area, which will be facilitated by the inclusion of the estates, will generate significant net additional economic benefits to the two Boroughs of Hammersmith and Fulham and Kensington and Chelsea which local residents can benefit from.

## 2.5 Failure to assess residents' community transfer option

Options 1 and 2 included the potential for improvements and infill development, such as those proposed under the residents' community transfer. It is also understood that the Council has indicated that it would be willing to pursue options for local ownership following redevelopment.

The Economic Appraisal has had regard to the various proposals for the area, including those of local residents. Its focus was on the net additional benefits to the two boroughs of the inclusion or not of the estates within the proposed comprehensive regeneration scheme for the overall Earl's Court and West Kensington Opportunity Area.

## 3 Conclusion

The Estate Regeneration Economic Appraisal study has been completed. It has assessed the additional economic costs and benefits for the two boroughs of Hammersmith and Fulham and Kensington and Chelsea of five options (including a reference case) for the estates and the wider Earl's Court and West Kensington Opportunity Area.

The Estate Regeneration Economic Appraisal is not considered to be 'fundamentally flawed'. It has appraised a variety of options for the estates ranging from minimal intervention through to comprehensive regeneration as part of the Earl's Court and West Kensington Opportunity Area. The Economic Appraisal included analysis of the gross and net additional impacts associated with each option. It has informed the Council's decision about the inclusion of the estates within the proposed comprehensive regeneration scheme for the Earl's Court and West Kensington Opportunity Area. It has also been used to inform the current consultation document about whether or not to enter into a land sale agreement involving the West Kensington and Gibbs Green Estates.



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## **SPECIAL MOTION NO. 1 – BORIS/BARCLAYS BANK BIKES**

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Standing in the names of:

- (i) Councillor Lisa Homan
- (ii) Councillor Andrew Jones

“This Council believes that its reported £2 million contribution towards the Boris/Barclays Bank Bikes schemes is a terrible waste of money and determines NOT to contribute a single penny of LBHF money towards the Boris/Barclays Bank Bikes scheme. We urge the London Mayor to find private sector funding to make this scheme work and deliver value for money.

The Council believes it is a priority to cut all council taxes and this money could better be used to do that or be put towards other local priorities such as reversing the cuts to police sergeants, paying off debt, or improving other local services and facilities in line with residents’ wishes.”

# Agenda Item 6.2

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## SPECIAL MOTION NO. 2 – TOWN HALL DEVELOPMENTS

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Standing in the names of:

- (i) Councillor Michael Cartwright
- (ii) Councillor Stephen Cowan

“This Council regrets the severe impact on our residents following the Conservative Administration’s decision to declare to property speculators that Hammersmith and Fulham is *“Open for businesses.”*

It further notes the failure of the London Mayor to police the London Plan.”