

Planning and Development Control Committee

Agenda

Wednesday 26 November 2025 at 7.00 pm

145 King Street (Ground Floor), Hammersmith, W6 9XY

Watch the meeting live: youtube.com/hammersmithandfulham

MEMBERSHIP

Administration:	Opposition
Councillor Nikos Souslous (Chair) Councillor Nicole Trehy (Vice-Chair) Councillor Ross Melton Councillor Patrick Walsh Councillor Callum Nimmo Councillor Lydia Paynter	Councillor Alex Karmel Councillor Adrian Pascu-Tulbure

CONTACT OFFICER: Charles Francis
Governance and Scrutiny
Tel: 07776 672945
E-mail: charles.francis@lbhf.gov.uk

Public Notice

This meeting is open to the public and press but spaces are limited. If you'd like to attend please contact: charles.francis@lbhf.gov.uk. The building has disabled access.

Should exempt information need to be discussed the committee will pass a resolution requiring members of the press and public to leave.

For details on how to register to speak at the meeting, please see overleaf.
Deadline to register to speak is 4pm on Friday 21st November 2025.

For queries concerning a specific application, please contact the relevant case officer.

PUBLIC SPEAKING AT PLANNING AND DEVELOPMENT CONTROL COMMITTEE

Who can speak?

Only the applicant or their agent and people who have commented on the application as part of the planning department consultation process in support or against will be permitted to speak at the meeting. They must have been registered to speak before addressing the committee. Ward Councillors may sometimes wish to speak at meetings even though they are not part of the committee. They can represent the views of their constituents. The Chair will not normally allow comments to be made by other people attending the meeting or for substitutes to be made at the meeting.

Do I need to register to speak?

All speakers, except Ward Councillors, must register at least two working days before the meeting. For example, if the committee is on Wednesday, requests to speak must be made by 4pm on the preceding Friday. Requests received after this time will not be allowed.

Registration is by email only. Requests should be sent to speakingatplanning@lbhf.gov.uk with your name, address and telephone number and the application you wish to speak to as well as the capacity in which you are attending.

How long is provided for speakers?

Those speaking in support or against an application will be allowed three minutes each. Where more than one person wishes to speak for or against an application, a total of five minutes will be allocated to those speaking for and those speaking against. The speakers will need to decide whether to appoint a spokesperson or split the time between them. The Chair will say when the speaking time is almost finished to allow time to round up. The speakers cannot question councillors, officers or other speakers and must limit their comments to planning related issues.

At the meeting

Please arrive 15 minutes before the meeting starts and make yourself known to the Committee Co-ordinator who will explain the procedure.

What materials can be presented to committee?

To enable speakers to best use the time allocated to them in presenting the key issues they want the committee to consider, no new materials or letters or computer presentations will be permitted to be presented to the committee.

What happens to my petition or deputation?

Written petitions made on a planning application are incorporated into the officer report to the Committee. Petitioners, as members of the public, are welcome to attend meetings but are not permitted to speak unless registered as a supporter or objector to an application. Deputation requests are not accepted on applications for planning permission.

Planning and Development Control Committee Agenda

26 November 2025

<u>Item</u>	<u>Pages</u>
1. APOLOGIES FOR ABSENCE	
2. DECLARATION OF INTERESTS If a Councillor has a disclosable pecuniary interest in a particular item, whether or not it is entered in the Authority's register of interests, or any other significant interest which they consider should be declared in the public interest, they should declare the existence and, unless it is a sensitive interest as defined in the Member Code of Conduct, the nature of the interest at the commencement of the consideration of that 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 disclosable pecuniary interest or other significant 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. Where Members of the public are not allowed to be in attendance and speak, then the Councillor with a disclosable pecuniary interest should withdraw from the meeting whilst the matter is under consideration. Councillors who have declared other significant interests should also withdraw from the meeting if they consider their continued participation in the matter would not be reasonable in the circumstances and may give rise to a perception of a conflict of interest. Councillors are not obliged to withdraw from the meeting where a dispensation to that effect has been obtained from the Standards Committee.	
3. MINUTES	5 - 9
To approve the minutes of the meeting held on 11 November 2025 as an accurate record.	
4. LAND BOUNDED BY NORTH END ROAD, BEAUMONT AVENUE, WEST CROMWELL ROAD, WEST LONDON RAILWAY LINE, LILLIE ROAD, LAND COMPRISING THE EMPRESS STATE BUILDING, AISGILL AVENUE, THE FORMER GIBBS GREEN SCHOOL AND PROPERTIES FRONTING DIEPPE CLOSE, LONDON, SW6 / W14, WEST KENSINGTON, 2024/01942/COMB	10 - 460

London Borough of Hammersmith & Fulham



Planning and Development Control Committee Minutes

Tuesday 11 November 2025

PRESENT

Committee members: Councillors Nikos Souslous (Chair), Nicole Trehy (Vice-Chair), Patrick Walsh, Callum Nimmo, Lydia Paynter, Adrian Pascu-Tulbure and Alex Karmel

Officers:

Matt Butler (Assistant Director of Development Management)
Allan Jones (Team Leader Urban Design and Heritage)
Neil Egerton (Team Leader)
Roy Asagba-Power (Team Leader)
Sian Brown (Principal Planning Officer)
Catherine Patterson (Principal Transport Planner)
Gareth Doherty (Senior Transport Planner)
Mrinalini Rajaratnam (Chief Solicitor Planning and Property)
Charles Francis (Clerk)

1. APOLOGIES FOR ABSENCE

Apologies for absence were provided by Councillor Ross Melton.

2. DECLARATION OF INTERESTS

In relation to Item 5 (Chivas House, 72 Chancellors Road) Councillor Callum Nimmo declared the applicant had attended his ward surgery and shown him a presentation on the application. He explained he had not expressed a view on the application. He confirmed he would consider the application with an open mind and on its merits. He participated in the meeting and voted on the item.

3. MINUTES

The minutes of the previous meeting held on 14 October 2025 were agreed as an accurate record.

4. 50 BROOK GREEN, LONDON W6 7BJ, BROOK GREEN, 2025/00492/VAR

An addendum was circulated prior to the meeting that modified the report.

Sian Brown provided a presentation. As there were no objectors, the Applicant waived his right to speak.

The Committee voted on the officer recommendations for approval as amended by the Addendum as follows:

Recommendation 1:

FOR	Unanimous
AGAINST:	0
NOT VOTING:	0

Recommendation 2:

FOR:	Unanimous
AGAINST:	0
NOT VOTING:	0

RESOLVED

1. That the Director of Planning and Property be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed in the report as amended by the Addendum.
2. That the Director of Planning and Property, after consultation with the Assistant Director of Legal Services and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or proposed conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.

5. CHIVAS HOUSE, 72 CHANCELLORS ROAD, LONDON W6 9RS, HAMMERSMITH BROADWAY, 2024/03249/FUL

In relation to Item 5 (Chivas House, 72 Chancellors Road) Councillor Callum Nimmo declared the applicant had attended his ward surgery and shown him a presentation on the application. He explained he had not expressed a view on the application. He confirmed he would consider the application with an open mind and on its merits. He participated in the meeting and voted on the item.

An addendum was circulated prior to the meeting that modified the report.

Sian Brown provided a presentation. The Applicant spoke in support of the application.

The Committee voted on the officer recommendations for approval as amended by the Addendum as follows:

Recommendation 1:

FOR	Unanimous
AGAINST:	0
NOT VOTING:	0

Recommendation 2:

FOR:	Unanimous
AGAINST:	0
NOT VOTING:	0

RESOLVED

1. That the Director of Planning and Property be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed in the report as amended by the Addendum.
2. That the Director of Planning and Property, after consultation with the Assistant Director of Legal Services and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or proposed conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.

6. 316 WANDSWORTH BRIDGE ROAD, LONDON SW6 2TZ, PALACE AND HURLINGHAM, 2025/00023/FUL

An addendum was circulated prior to the meeting that modified the report.

Roy Asagba-Power provided a presentation. As there were no objectors, the Agent waived his right to speak.

During discussions, Councillor Alex Karmel proposed a new condition to prevent the conversion of the commercial unit (Class E use) permitted on the ground floor into additional residential units under permitted development rights without applying for planning permission. This was to enable the cumulative impact of the scheme to be considered by the officers. Authority to be granted to the officers to secure this by the appropriate wording.

This was seconded by Councillor Adrian Pascu-Tulbure. The Committee voted on the new Condition as follows:

FOR	5
AGAINST:	2
NOT VOTING:	0

The new Condition was carried.

The Committee then voted on the officer recommendations for approval as amended by the Addendum and the committee as follows:

Recommendation 1:

FOR	Unanimous
AGAINST:	0
NOT VOTING:	0

Recommendation 2:

FOR:	Unanimous
AGAINST:	0
NOT VOTING:	0

RESOLVED

1. That the Director of Planning and Property be authorised to grant planning permission subject to the conditions listed in the report as amended by the Addendum and added at committee.
2. That the Director of Planning and Property, after consultation with the Assistant Director of Legal Services and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.

Addendum

Meeting started: 7.00 pm
Meeting ended: 8.45 pm

Chair

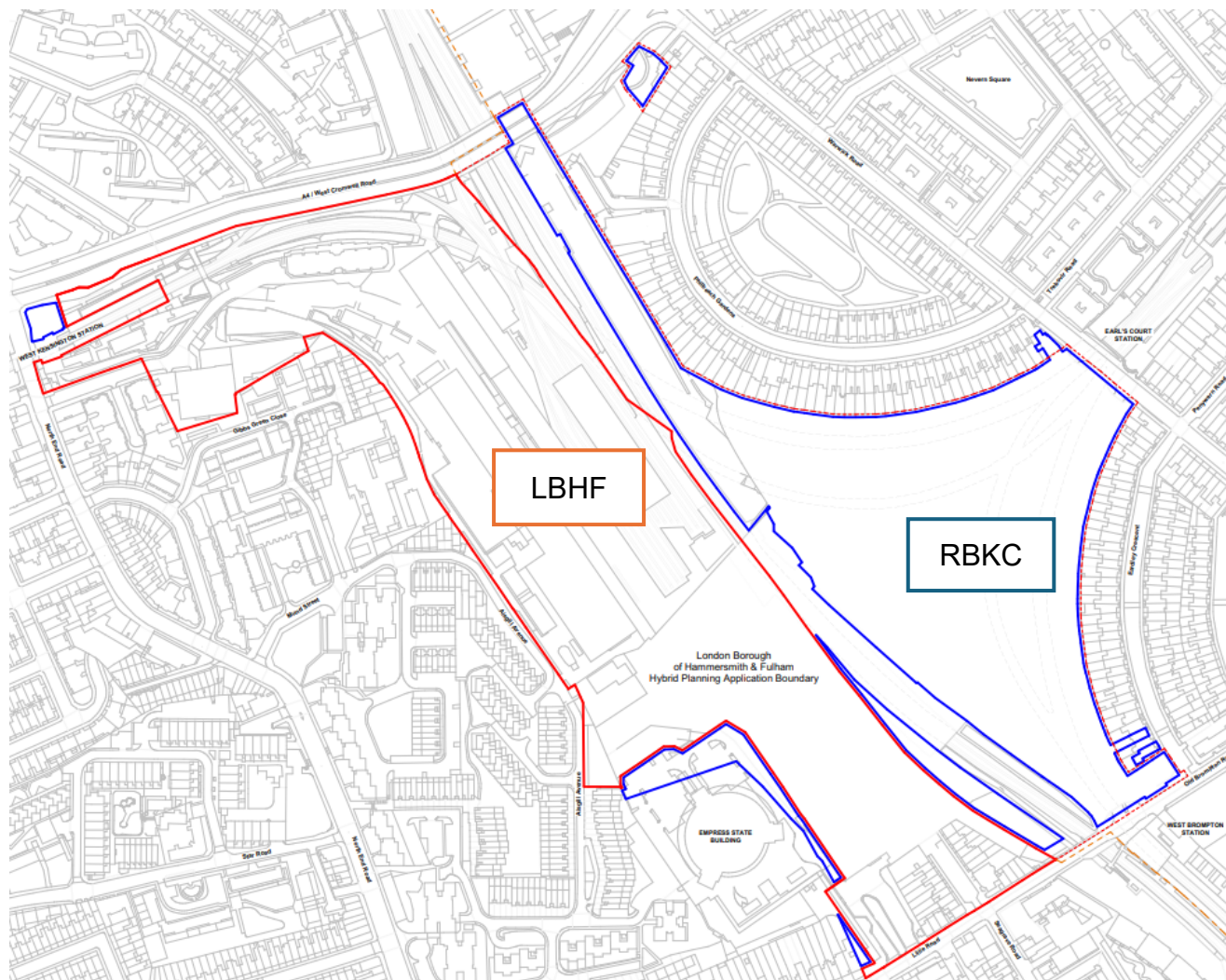
Contact officer: Charles Francis
Committee Co-ordinator
Governance and Scrutiny
Tel 07776 672945
E-mail: charles.francis@lbhf.gov.uk

Agenda Item 4

Ward: West Kensington

Site Address:

Land bounded by North End Road, Beaumont Avenue, West Cromwell Road, West London Railway Line, Lillie Road, land comprising the Empress State Building, Aisgill Avenue, the former Gibbs Green School and properties fronting Dieppe Close, London, SW6 / W14



For identification purposes only - do not scale.

Reg. No:
2024/01942/COMB

Case Officer:
John Sanchez

Date Valid:
17.09.2024

Conservation Area:
Baron's Court

Committee Date:
26.11.2025

Applicant:

Earls Court Partnership Limited
C/o Agent

Description:

Hybrid planning application (part in detail and part in outline) for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed-use development above and below ground level and all associated and ancillary works and structures including temporary development, highway and infrastructure works and structures, comprising:

Outline proposals for up to 373,000sqm GEA of mixed use floorspace for residential use (Use Class C3) (up to 2,044 homes) and non-residential uses comprising hotel (Use Class C1), older persons housing (Use Class C2), office and/or research and development (Use Class E(g)), education (Use Class E(f)/F), retail, food and beverage and other commercial uses (Use Class E(a)/(b)/(c)), leisure facilities (Use Class E(d)), cultural facilities (Use Class F), storage and distribution (Use Class B8), community and social facilities (Use Class E(e)/(f)/F) and sui generis use (student accommodation and co-living, theatre, nightclub, car show room, drinking establishment (with or without expanded food provision), hot food takeaway, live music performance venue, cinema, concert hall, bingo hall and dance hall uses) together with ancillary floorspace

Detailed proposals for four buildings (to comprise 92,973 sqm GEA), ranging between 13 and 42 storeys in height (up to +158m AOD) for a mix of uses including: residential use (Use Class C3) to provide 456 homes (Use Class C3), student accommodation, delivering up to 696 rooms and non-residential floorspace comprising: up to 3,235 sqm GEA of flexible retail, food & beverage, commercial and/or cultural floorspace (Use Classes E(a)/(b)/(c)/F/sui generis); 2,113 sqm GEA leisure floorspace (Use Classes E(d) / sui generis) and 422 sqm GEA of community floorspace (Use Classes E(e)/(f)/(g)/F together with ancillary floorspace.

This application is accompanied by an Environmental Impact Assessment.

Drg. Nos: See Conditions below, and List of Supporting Documents (Appendix A).

REPORT CONTENTS

	• RECOMMENDATIONS • DEFINITIONS / CONDITIONS • RECOMMENDED REASONS FOR APPROVAL
	OFFICER REPORT
1.0	SUMMARY
2.0	SITE DESCRIPTION AND SURROUNDINGS
3.0	PLANNING HISTORY
4.0	DESCRIPTION OF DEVELOPMENT
5.0	PUBLICITY AND CONSULTATION
6.0	ENVIRONMENTAL STATEMENT
7.0	POLICY CONTEXT
8.0	PLANNING CONSIDERATIONS (Introduction)
9.0	PRINCIPLE OF DEVELOPMENT / LAND USES Mixed Land Use Development / Opportunity/Regeneration Area
10.0	HOUSING Residential (Class C3) including Mix, Tenure and Affordable Housing Viability Assessment / Residential Density / Standard of Accommodation and Amenity Space including Wheelchair Units Older Persons Housing / Purpose-Built Student Accommodation (“PBSA”) / Co-living /Employment Related Accommodation (“ERA”)
11.0	NON-RESIDENTIAL USES Offices: Research and Development and other workspaces, including Affordable Workspace / Culture / Retail & Leisure / Hotel / Social Infrastructure/ Storage & Distribution / Sui Generis Uses
12.0	DESIGN, HERITAGE, AND TOWNSCAPE Policy Review / Design-Led Approach (Detailed / Outline Components) / Layout and legibility / Building Heights, Scale and Massing (including Tall Building

	Statement) / Townscape and Heritage / Heritage Constraints / Impacts on Heritage Assets and Impact on Strategic Local Views
13.0	ECOLOGY including Urban Greening and Net Biodiversity Gain Ecology/ Nature conservation / Landscape/Public Realm including trees / Urban Greening Factor and Biodiversity Net Gain / Children's Play Space
14.0	Accessibility & Inclusivity / Fire Safety / Designing out Crime / Community Safety & Security
15.0	AMENITY CONSIDERATIONS Daylight, Sunlight, Overshadowing and Solar Glare and Light Spill / Daylight/Sunlight within the development / Overlooking & Privacy
16.0	HIGHWAYS AND TRANSPORT Policy review / Site location and access to public transport / Trip Generation / Travel Plans / Access and permeability / Public realm / Cycle parking / Car parking and vehicle access / Refuse and Recycling / Deliveries and servicing / Demolition/Construction logistics / Transport Assessment / Highway works / Pedestrian, Cycling and Environmental Improvements / Micro and shared mobility Improvements
17.0	ENVIRONMENTAL CONSIDERATIONS Energy and Sustainability including Climate Change / Ground Contamination / Archaeology / Air Quality / Flood Risk and Drainage / Noise and Vibration / Light Pollution / Wind Microclimate / Aviation Safety
18.0	SOCIO ECONOMICS/ EQUALITY CONSIDERATIONS
19.0	COMMUNITY INFRASTRUCTURE LEVY (CIL) & SECTION 106 HEADS OF TERMS
20.0	CONCLUSION
	APPENDICES (BACKGROUND PAPERS) Appendix A: Documents and Drawings for Approval / Background Papers Appendix B: List of Consultation Responses (Consultee/Neighbour Comments) Appendix C: List of Relevant Policies

OFFICER RECOMMENDATION:

1. That the Committee resolve that, subject to there being no contrary direction from the Mayor for London, that the Director of Planning and Property be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below.
2. That the Committee resolve that the Director of Planning and Property, after consultation with the Assistant Director of Legal Services and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or proposed conditions, which may include the variation, addition or deletion of conditions, and any such changes shall be within their discretion.

TABLE OF DEFINITIONS

Definitions and Interpretation: Where in these Conditions, the following defined terms are used they shall have the following meanings:

Term	Definition
“Above Ground Works”	means any works of construction above ground floor slab
“All Phases”	means all phases as shown on the most recently approved Phasing Plan pursuant to Condition 12
“Application for Reserved Matters”	means an application which seeks approval for one or more Reserved Matters pursuant to this Planning Permission
“Advance Infrastructure Works” (“AIW”) or “Preparatory Works”	means the advance infrastructure or preparatory works required for the development, to be approved by the Local Planning Authority pursuant to Condition 14 which may comprise (but are not limited to) the following works: a) Construction of temporary roads or highway access

	b) Termination, laying and diversion of utilities and services, where not undertaken by a statutory provider under their statutory powers c) Decontamination and remediation works d) Rail infrastructure works e) Repairs of existing structures f) Site clearance g) Ground investigation h) Archaeological investigation i) Noise attenuation works j) Bulk earthworks k) Construction of temporary roads, paths and accesses l) Piling works required to support underground infrastructure m) provision of temporary construction site accommodation n) works and operations to enable any of the foregoing to take place
“At Grade Works”	means any works of construction at ground level
“Building”	means a building or part thereof within a Development Zone or Development Plot
“Below Ground Floorspace”	means floor space below ground floor slab
“Below Ground Works”	means engineering or construction operations that take place below ground level
“BREEAM”	means the Building Research Establishment Environmental Assessment Methodology (BREEAM), published by the Building Research Establishment (BRE)
“CIL”	means the Community Infrastructure Levy that is charged pursuant to the Community Infrastructure Levy Regulations 2010 (as amended)
“CIL Phase”	means a defined part of the Development identified on the approved CIL Phasing Plan that is treated as a separate chargeable development for the purposes of calculating and charging CIL
“CIL Phasing Plan”	means a plan or plans that identify each CIL Phase for the Development

“Commencement”	means the date on which this “Planning Permission” is first implemented by the carrying out of a material operation as defined in Section 56(4) of the Town and Country Planning Act 1990 (as amended) in connection with the Development
“Construction Works”	means works or operations, other than those Advance Infrastructure Works or Preparatory Works approved pursuant to Condition 14 , in the process of erecting a building or structure
“Control Documents”	means the Parameter Plans, the Development Specification and the Design Code referred to in Condition 5
“Decision Notice”	means this Decision Notice for Planning Permission
“Demolition Works”	means works in the process of demolishing all or part of an existing building or structure including the removal of any underground structures
“Design Code”	means Design Code as referred to in Condition 5
“Detail” “Detailed Approval” or “Detailed Component”	means parts of the Development that are approved in detail under this Planning Permission
“Development”	means the development approved pursuant to this Planning Permission
“Development Phase”	means a phase of the Development as shown on the Phasing Plan approved pursuant to Condition 12. Development Phases may comprise any component part of the Development and either individually or collectively comprise Demolition, Preparatory, Advance Infrastructure and/or Construction Works (including landscaping or public realm works). Each Development Phase shall comprise a separate phase of the Development, but shall not be required to align with CIL Phases, which are defined separately
“Development Plot(s)” or “Plots”	means an area within a Development Zone, referred to as a Development Plot as shown on Parameter Plan Ref: PP004 as approved under Condition 5 , where buildings, communal areas and the public realm will come forward.

“Development Specification”	means the Development Specification as approved under Condition 5
“Development Zone(s)” or “Zone(s)”	means a Development Zone as shown on Parameter Plan as approved under Condition 5
“Early Phases”	means Development Phases covering Development Zones B1, C, G1, H, I and P and land that adjoins but is not within those Development Zones as shown on the most recently approved Phasing Plan pursuant to Condition 5
“Illustrative Reconciliation Plan”	means a visual plan that shows parts of the Development that have been approved in detail alongside remaining parts of the Development approved in outline and shown for illustrative purposes
“Local Planning Authority” or “Council”	means the London Borough of Hammersmith and Fulham (“LBHF”)
“Maximum Parameter”	means the upper limit of development shown on a Parameter Plan approved by this Planning Permission
“Meanwhile Use(s)” or “Temporary Use(s)”	means a use or uses that will be in place for a temporary period to activate parts of the Site in advance of permanent redevelopment
“Parameter Plan”	means any one of the Parameter Plans listed on this Decision Notice (Condition 5)
“Phase”, “Phased” or “Phases”	means a part or parts of the Development which may be a Development Phase or a CIL Phase as referred to on approved Phasing Plans pursuant to Conditions 12 and 13
“Phase 1”	means the first Development Phase within the Development covering Development Zones H and N within LBHF and including Public Realm and associated open space(s) contained in conjunction with the RBKC in the first phase of the development
“Planning Permission”	means this planning permission, reference 2024/01942/COMB
“Occupation” or “First Occupation”	means the earliest date when the Site (or, where otherwise specified in a particular condition, a Development Zone or Development Plot, or part of a

	Development Zone or a Development Plot) is occupied for any purpose or opened for business or trading, excluding occupation for the purpose of construction, demolition, decoration, fitting out and marketing and 'Occupied' and 'Occupy' shall be construed accordingly
“Outline”, “Outline Approval” or “Outline Component”	means the parts of this Planning Permission granted in outline and subject to approval of Reserved Matters
“Radar Operator”	means Heathrow Airport or National Air Traffic Services (NATS') as relevant that manages radar systems for civil air traffic control
“Reconciliation Statement”	means a document to be submitted with each relevant application for Reserved Matters Approval to demonstrate the Development is built out in accordance with Approved Parameters
“Reserved Matters Approval” or “RMA”	means an approved Application for Reserved Matters pursuant to this Planning Permission
“Reserved Matters”	means the details to be submitted pursuant to this Planning Permission relating to matters of access, appearance, landscaping, layout and scale which are reserved for subsequent approval
“Residential Unit(s)”	means residential (Use Class C3) dwellings as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended)
“RBKC”	means the Royal Borough of Kensington and Chelsea
“Site”	means the site area covered by this Planning Permission and shown outlined in red on Parameter Plan Ref: PP001 as approved under Condition 5
“Temporary Works”	means works of a temporary nature, such as, temporary hard and/or soft landscaping or temporary vehicular routes or land uses or structures.

CONDITIONS

In line with the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, officers have consulted the applicant on the pre-commencement conditions included in the agenda and the applicant has raised no objections.

DETAILED COMPONENT

(1) Time Limit (Detailed Component)

The Detailed Component of the Development hereby approved shall be commenced before the expiration of 3 years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

(2) Approved Plans (Detailed Component)

The Development hereby approved for the Detailed Component within Development Plots WB03, WB04 and WB05 shall not be constructed unless in accordance with the approved drawings listed below:

Site Location Plan

- ECD-SW-ZZ-HBS-07-XX-DR-A-102224 - P02

Development Plot WB03

- ECD-WB03-P1-SER-07-ZZ-DR-A-002205 – 01 - WB03 Podium Plans
- ECD-WB03-T1-SER-07-ZZ-DR-A-002206 – 01 - WB03 Floor Plans Levels 2-28
- ECD-WB03-T1-SER-07-ZZ-DR-A-002207 – 01 - WB03 Floor Plans Levels 29 - Roof
- ECD-WB03-ZZ-SER-07-ZZ-DR-A-002220 – 01 - WB03 North-East Elevation
- ECD-WB03-ZZ-SER-07-ZZ-DR-A-002221 – 01 - WB03 North-West Elevation
- ECD-WB03-ZZ-SER-07-ZZ-DR-A-002222 – 01 - WB03 South-East Elevation
- ECD-WB03-ZZ-SER-07-ZZ-DR-A-002223 – 01 - WB03 South-West Elevation
- ECD-WB03-ZZ-SER-07-ZZ-DR-A-002301 – 01 - WB03 Section 1
- ECD-WB03-ZZ-SER-07-ZZ-DR-A-002302 – 01 - WB03 Section 2

Development Plot WB04

- ECD-WB04-T1-SHR-07-ZZ-DR-A-102223 – 01 - WB04 Proposed South-West Elevation
- ECD-WB04-T1-SHR-07-ZZ-DR-A-102222 – 01 - WB04 Proposed South-East Elevation
- ECD-WB04-T1-SHR-07-ZZ-DR-A-102260 – 01 - WB04 Proposed Cross Section 01
- ECD-WB04-T1-SHR-07-ZZ-DR-A-102261 – 01 - WB04 Proposed Cross Section 02

- ECD-WB04-T1-SHR-07-ZZ-DR-A-10222 – 01 - WB04 Proposed North-West Elevation
- ECD-WB04-T1-SHR-07-ZZ-DR-A-102220 – 01 - WB04 Proposed North-East Elevation
- ECD-WB04-T1-SHR-07-ZZ-DR-A-102204 – 01 - WB04 Proposed Floorplates Levels 33 to 40
- ECD-WB04-T1-SHR-07-ZZ-DR-A-102205 – 01 - WB04 Proposed Floorplates Level 41 to Roof
- ECD-WB04-P1-SHR-07-ZZ-DR-A-102211 – 01 - WB04 Proposed Podium South-West Elevations
- ECD-WB04-P1-SHR-07-ZZ-DR-A-102210 – 01 - WB04 Proposed Podium North-East and North-West Elevations
- ECD-WB04-P1-SHR-07-ZZ-DR-A-102262 – 01 - WB04 Proposed Podium Sections
- ECD-WB04-P1-SHR-07-LG-DR-A-102199 – 01 - WB04 Proposed Lower Ground Floor Plan
- ECD-WB04-T1-SHR-07-ZZ-DR-A-102203 – 01 - WB04 Proposed Floorplates Level 2 to 32
- ECD-WB04-P1-SHR-07-GF-DR-A-102200 – 01 - WB04 Proposed Ground Floor Plan
- ECD-WB04-P1-SHR-07-01-DR-A-102201 – 01 - WB04 Proposed 1st Floor Plan
- ECD-WB04-P1-SHR-07-02-DR-A-102202 – 01 - WB04 Proposed 2nd Floor Plan
- ECD-WB04-P1-SHR-07-B1-DR-A-102198 – 01 - WB04 Proposed Podium Basement Floor Plan
- ECD-WB04-P1-SHR-07-B1-DR-A-102319 – LBHF Detailed Component WB04 Entrance Lobby Bay Study
- ECD-WB04-P1-SHR-07-B1-DR-A-102320 – LBHF Detailed Component WB04 Bay Study Podium
- ECD-WB04-P1-SHR-07-B1-DR-A-102321 – LBHF Detailed Component WB04 Bay Study Typical
- ECD-WB04-P1-SHR-07-B1-DR-A-102322 – LBHF Detailed Component WB04 Detailed Component Bay Study Top

Development Plot WB05

- ECD-WB05-ZZ-DRM-07-RF-DR-A-020120 – 01 - WB05 Proposed Roof Floor Plan
- ECD-WB05-ZZ-DRM-07-ZZ-DR-A-020110 – 01 - WB05 Proposed Typical Upper Floor Plan
- ECD-WB05-T2-DRM-07-ZZ-DR-A-040112 – 01 - WB05 Proposed T2 North and South Elevations
- ECD-WB05-T2-DRM-07-ZZ-DR-A-040113 – 01 - WB05 Proposed T2 East and West Elevations
- ECD-WB05-ZZ-DRM-07-ZZ-DR-A-020103 – 01 - WB05 Proposed Typical Lower Floor Plan
- ECD-WB05-ZZ-DRM-07-ZZ-DR-A-030100 – 01 - WB05 Proposed Site Section
- ECD-WB05-ZZ-DRM-07-ZZ-DR-A-040101 – 01 - WB05 Proposed South-East Site Elevation

- ECD-WB05-ZZ-DRM-07-ZZ-DR-A-040100 – 01 - WB05 Proposed North-West Site Elevation
- ECD-WB05-ZZ-DRM-07-M1-DR-A-020121 – 01 - WB05 Proposed Mezzanine Floor Plan
- ECD-WB05-ZZ-DRM-07-GF-DR-A-020100 – 01 - WB05 Proposed Ground Floor Plan
- ECD-WB05-ZZ-DRM-07-16-DR-A-020116 – 01 - WB05 Proposed Sixteenth Floor Plan
- ECD-WB05-ZZ-DRM-07-15-DR-A-020115 – 01 - WB05 Proposed Fifteenth Floor Plan
- ECD-WB05-ZZ-DRM-07-14-DR-A-020114 – 01 - WB05 Proposed Fourteenth Floor Plan
- ECD-WB05-ZZ-DRM-07-09-DR-A-020109 – 01 - WB05 Proposed Ninth Floor Plan
- ECD-WB05-ZZ-DRM-07-02-DR-A-020102 – 01 - WB05 Proposed Second Floor Plan
- ECD-WB05-ZZ-DRM-07-01-DR-A-020101 – 01 - WB05 Proposed First Floor Plan
- ECD-WB05-T1-DRM-07-ZZ-DR-A-040111 – 01 - WB05 Proposed T1 North-East and South-West Elevations
- ECD-WB05-T1-DRM-07-ZZ-DR-A-040110 – 01 - WB05 Proposed T1 North-West and South-East Elevations

LBHF Detailed Component: Combined Drawings

- ECD-WBZZ-ZZ-SHR-07-GF-DR-A-102001 – 01 - LBHF Detailed Component Ground Floor Location Plan
- ECD-WBZZ-ZZ-SHR-07-RF-DR-A-102002 – 01 – LBHF Detailed Component Roof Location Plan

LBHF Detailed Component: Landscaping

- ECD-WB03-P1-LDA-07-02-DR-L-000011 – 01 - WB03 Podium General Arrangement
- ECD-WB03-T1-LDA-07-ZZ-DR-L-000002 – 01 - WB03 Terraces General Arrangement
- ECD-WB04-T1-LDA-07-39-DR-L-000005 – 01 - WB04 T1 L39 Terraces General Arrangement
- ECD-WB04-P1-LDA-07-02-DR-L-000012 – 01 - WB04 Podium General Arrangement
- ECD-WB04-T1-LDA-07-33-DR-L-000003 – 01 - WB04 T1 L33 Terraces General Arrangement
- ECD-WB04-T1-LDA-07-35-DR-L-000004 – 01 - WB04 T1 L35 Terraces General Arrangement
- ECD-WB05-P1-LDA-07-GF-DR-L-000006 – 01 - WB05 Ground Floor General Arrangement
- ECD-WB05-P1-LDA-07-01-DR-L-000007 – 01 - WB05 1st Floor General Arrangement

Reason: To ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans, in accordance

with the National Planning Policy Framework (NPPF), Policies SD1, D4, D5, D7, D8, D9, D11, D12, D14, HC1, HC3, HC4, G5, G6 and G7 of the London Plan (2021) and Policies FRA, FRA1, DC1, DC2, DC3 and DC8 of the Local Plan (2018).

OUTLINE COMPONENT

(3) Time Limits (Reserved Matters)

No part of the Development hereby approved in Outline (other than any Demolition, or Preparatory or Advance Infrastructure Works approved pursuant to Condition 15) shall be commenced until application(s) for Reserved Matters Approval (RMA) specified in Condition 4, in relation to that part of the Development, have been submitted to and approved in writing by the Local Planning Authority.

- a) The first Reserved Matters Application(s) of the Development hereby approved, relating to Phase 1 outline aspect, shall be submitted to the Local Planning Authority within **2 years** of the date of this Permission.
- b) All applications for RMA for land within the Early Phases of the Development hereby approved shall be submitted to the Local Planning Authority no later than the expiration of **11 years** of the date of this Permission
- c) Each RMA for a Development Plot (or any part of the Site not within a Development Plot) shall be commenced within **3 years** of the date of the RMA or, in the event a RMA should lapse or in the case of approval of Reserved Matters on different dates, within 3 years of the date of the final approval of the Reserved Matters in respect of that Development Plot (or part of the Site not within a Development Plot).
- d) No application for Reserved Matters Approval shall be submitted after **17 years** from the date of this Permission.

Reason: To comply with the provisions of Section 92 of The Town and Country Planning Act 1990 (as amended).

(4) Submission of Reserved Matters

Prior to the Commencement of the Development hereby approved (other than any Advance Infrastructure & Preparatory Works pursuant to Condition 15) in respect of each Development Plot or Zone hereby approved in Outline, the following Reserved Matters details shall be submitted to and approved in writing by the Local Planning Authority for that Development Plot or Zone prior to the commencement of the relevant development within the outline component:

- Appearance
- Landscaping
- Layout
- Scale
- Means of access

The Development shall be carried out in accordance with the details so approved.

Reason: In the interests of proper planning and ensuring conditions are

Enforceable, in compliance with the Town and Country Planning (Development Management Procedure) Order 2015 (as amended).

(5) Control Documents (Outline Component)

The Development hereby permitted for the Outline Component shall be carried out in accordance with the following Control Documents:

Parameter Plans - Revision 01 – prepared by Hawkins\Brown & Studio Egret West (July 2025) comprising:

- 001 / P02 – Site Location Plan
- 002 / P02 – Demolition Plan
- 003 / P02 – Existing Site Levels
- 004 / P02 – Development Zones, Maximum Building Lines and Public Realm
- 005 / P02 – Proposed Plot Plan
- 006 / P02 – Proposed Maximum Heights
- 007 / P02 – Proposed Public Realm Typologies
- 008 / P02 – Proposed Access and Movement
- 009 / P02 – Proposed Site Levels Ground Floor
- 010 / P02 – Proposed Site Levels below Ground Floor
- 011 / P02 – Proposed Land Use Ground Level
- 012 / P02 – Proposed Land Use Upper Levels
- 013 / P02 – Proposed Land Use below Ground Floor
- 014 / P02 – Urban Design Plan

Development Specification - Revision 01 - prepared by ECDC Planning (August 2025)

Design Code - Revision. 01 - prepared Hawkins\Brown & Studio Egret West (July 2025)

Reason: To ensure the Development is undertaken in accordance with the approved drawings and documents, including the Environmental Statement Addendum, ensure compliance with the Development Plan and ensure the delivery of a high-quality design and otherwise conforms to the principles of sustainable development as described in the National Planning Policy Framework (NPPF), Policies SD1, D1, D2, D3, D4, D5, D7, D8, D9, D11, D12, D13, D14, HC1, HC3, HC4, G5, G6 and G7 of the London Plan (2021) and Policies FRA, FRA1, DC1, DC2, DC3 and DC8 of the Local Plan (2018).

(6) RMA / Detailed Component: Occupation

No occupation of Development Plots WB03, WB04 or WB05 shall take place until Reserved Matters Approval has been granted for the design of the landscape within Phase 1, or such area as is approved by the Local Planning Authority, has been delivered and is ready for use.

Reason: In the interests of proper planning.

LAND USE AND QUANTUM OF DEVELOPMENT

(7) Total Development Floorspace (Gross External Area)

The total gross external floorspace (GEA) areas delivered within the Development hereby approved, comprising the land uses hereby approved shall not exceed **465,973 sqm (GEA)**, as detailed in Table 3 of the approved Earls Court Development Specification Document: Revision 01 (dated August 2025).

Reason: To ensure the Development is carried out in accordance with the approved Control Documents and to ensure that the quantum of floorspace remains within the approved parameters as assessed pursuant to the Environmental Impact Assessment of the Development, in accordance with Policies D1, D2, D3, D4, D5, D8, D9, D10, D11, D12, D13, HC1, HC3 and HC4 of the London Plan (2021), and Policies FRA, FRA1, DC1, DC2, DC3, DC4, DC7, DC8 , CC11, CF1, CF2 , TLC2, E1, E2 and E4 of the Local Plan (2018).

(8) Total Development: Maximum Floorspace/Land Use (Gross External Area)

The maximum built floorspace in respect of each of the following land uses (and Use Class) delivered within the Development hereby approved shall be:

Land Use (LBHF)	Maximum Floorspace GEA (sqm)
▪ Residential (Class C3)	▪ 290,000 sqm
▪ Office/Research & Development (Class E (g))	▪ 155,000 sqm
▪ Purpose Built Student Accommodation (Sui Generis)	▪ 68,000 sqm
▪ Co-Living (Sui Generis)	▪ 48,000 sqm
▪ Hotel (Class C1)	▪ 20,000 sqm.
▪ Education (Class E (f) / Class F1 (a))	▪ 25,000 sqm
▪ Health/Older Persons Housing (Class C2)	▪ 40,000 sqm.
▪ Flexible Retail/F&B/Commercial (Class E (a) (b) (c) / Sui Generis)	▪ 14,000 sqm
▪ Leisure (Class E (d) / Sui Generis)	▪ 9,000 sqm
▪ Culture (Class F / Sui Generis)	▪ 7,000 sqm
▪ Community / Social Infrastructure (Class F / E (e) (f) (g))	▪ 1,500 sqm
▪ Storage and Distribution (Class B8)	▪ 10,000 sqm
▪ Ancillary	▪ 30,000 sqm

Reason: To ensure the development carried out does not exceed the cumulative maximum approved and to ensure the quantum of floorspace keeps within the parameters assessed pursuant to the EIA and in accordance with Table 7 of the Earls Court Development Specification Document: Revision 01 (dated August 2025).

(9) Development Zone Quantum (Gross External Area)

The maximum total gross external floorspace (GEA) permitted within each of the Development Zones hereby approved shall not exceed that set out in the schedule below:

Development Plots (LBHF)	Maximum Floorspace GEA (sqm)
▪ Development Plot B1	▪ 30,000 sqm
▪ Development Plot C	▪ 48,000 sqm
▪ Development Plot G1	▪ 200 sqm
▪ Development Plot H	▪ 92,973 sqm
▪ Development Plot I	▪ 300 sqm
▪ Development Plot N	▪ 27,300 sqm
▪ Development Plot P	▪ 500 sqm
▪ Development Plot T	▪ 45,000 sqm
▪ Development Plot U	▪ 68,000 sqm
▪ Development Plot V1	▪ 10,000 sqm
▪ Development Plot W	▪ 42,000 sqm
▪ Development Plot X	▪ 86,000 sqm
▪ Development Plot Y	▪ 3,000 sqm
▪ Development Plot Z	▪ 10,000 sqm

Reason: To ensure the development carried out does not exceed the cumulative maximum approved and to ensure the quantum of floorspace keeps within the parameters assessed pursuant to the EIA and in accordance with Table 4 of the Earls Court Development Specification Document: Revision 01 (dated August 2025).

(10) Minimum Residential Units

The total minimum number of residential units (Class C3) provided within the Development (including the Detailed Component) shall be 2,000 units.

Reason: To control the minimum number of residential units to be provided by the approved development in accordance with the parameters set within the Development Specification document and Environmental Impact Assessment and in accordance with the NPPF (2024), Policies H1, H4, H5, H6, D1, D2, D3, D4, D5, D8, D9, D10, D11, D12, D13, HC1, HC3 and HC4 of the London Plan (2021) and policies FRA, FRA1, DC2, DC3, DC4, DC7, DC8, H01, H04 and H05 of the Local Plan (2018).

(11) New Residential Unit Sizes (Outline Component)

All new residential units shall be constructed to meet or exceed the minimum space standards set out in London Plan (2021) Policy D6 (Housing quality and standards) and Table 3.1 (Minimum internal space standards for new dwellings).

Reason: To ensure adequate space standards for new residents, in accordance with Policy D6 of the London Plan (2021) and Policy HO11 of the Local Plan (2018).

DEVELOPMENT PHASING

(12) Phasing Programme

The Development hereby approved by this Planning Permission shall be a Phased planning permission which expressly provides for the Development to be delivered in phases and for separate and independent elements of the Early and All Phases to be delivered.

No part of the Development shall be carried out in each phase unless and until the Phasing Plan showing the location of each Development Zone has been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of proper planning.

(13) CIL Phasing Plan

No part of the Development hereby approved shall be carried out unless and until a CIL Phasing Plan showing the location of each CIL Phase (above and below ground level) has been submitted to and approved in writing by the Local Planning Authority.

The Development shall only be carried out in accordance with the approved Phasing Plan imposed by Condition 13, which may be updated from time to time and submitted for approval in writing by the Local Planning Authority.

Reason: To assist with the identification of each chargeable development (being the Phase) and the calculation of the amount of CIL payable in respect of each chargeable development in accordance with the Community Infrastructure Levy Regulations 2010 (as amended).

PREPARATORY OR ADVANCED INFRASTRUCTURE WORKS (AIW)

(14) Preparatory Works / AIW

None of the other conditions imposed by this Permission (save for Conditions 3, 4, 30, 75., 76, 81, 97, 98, 99, 103, 104, 119 and 121) or any Reserved Matters Approval issued pursuant to this Planning Permission shall apply to Preparatory or Advance Infrastructure Works so as to prevent such works from being commenced and carried out, notwithstanding that the requirements of such conditions have not been first met, satisfied or otherwise discharged (either in whole or in part).

No element of Preparatory or Advance Infrastructure Works shall commence within a Development Zone unless and until the necessary information detailed below for proposed Preparatory or Advance Infrastructure Works (as appropriate) has been submitted to and approved in writing by the Local Planning Authority:

- (a) Drawings identifying the extent and location of the Preparatory or Advance Infrastructure Works.
- (b) Description of the proposed Preparatory or Advance Infrastructure Works.
- (c) Preparatory or Advance Infrastructure Works Management Plan, demonstrating compliance with the approved Site-wide Demolition and Construction Environmental Management Plan.

- (d) Preparatory or Advance Infrastructure Works Construction and Logistics Management Plan.
- (e) Drainage Statement.

Any submission pursuant to this condition shall demonstrate through an Environmental Statement (ES) Compliance Note that the proposed package of Preparatory or Advance Infrastructure Works is unlikely to have significant or additional adverse environmental effects compared to the conclusions of the ES (dated July 2024) and ES Addendum (dated August 2025).

Reason: To ensure that the development accords with the provisions and assessment of the approved Environmental Statement Addendum and to ensure that the development is carried out in a satisfactory manner in accordance with Policies DC1 and CC2 of the Local Plan (2018).

(15) Temporary Enclosures/Hoardings

Prior to the commencement of each Development Zone (or part of the Site not within a Development Zone) hereby approved, details of temporary fencing and/or enclosure of the site in each zone of the works shall be submitted to and approved in writing by the Local Planning Authority, for the relevant works and shall be retained as approved for the duration of the construction works.

The temporary fencing and/or enclosures (minimum height 2.5 m) shall be set around the perimeter of the zone of works, on all boundaries and constructed in accordance with BS 5975-2:2024. The temporary fencing and/or enclosures shall be installed prior to the start of any Preparatory or Advance Infrastructure Works and Demolition Works. No part of the temporary fencing and/or enclosure shall be used for the display of commercial advertisement hoardings unless the relevant advertisement consent is sought from the Local Planning Authority. The enclosures/hoardings shall be retained in a reasonable condition throughout the lifetime of the construction phases of development; and replaced as and when required.

Reason: To ensure a satisfactory external appearance, and to prevent harm to surrounding residential occupiers by way of dust, the street scene and public realm, in accordance with Policies SI 1 and D4 of the London Plan (2021), Policies DC1, DC8, CC10, CC12, and CC13 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

(16) Temporary / Meanwhile Uses

Prior to the commencement of relevant works for any temporary or meanwhile uses or structures, including temporary landscaping and sales / marketing suites within the Site, details shall be submitted to and approved in writing by the Local Planning Authority. Any such uses, structures or buildings shall be implemented in accordance with the approved details for a specified period set out in the details and shall be discontinued / removed once the temporary period has expired.

Reason: To ensure that the site remains in a tidy condition during the construction phase and to ensure that any temporary uses/structures do not create un-neighbourly impacts and to prevent harm to the street scene and character and appearance of the

adjoining conservation area, in accordance with Policy DC1, DC2 and DC8 of the Local Plan (2018).

FURTHER DETAILS CONDITIONS

(17) Materials/1:20 Details (All Development Plots)

Prior to commencement of Above Ground Works for a building within a Development Plot, the following details shall be submitted to and approved in writing by the Local Planning Authority:

- Schedule of external facing materials and roof treatments, including specifications, colours, finishes and samples (where appropriate).
- Sample panels shall be constructed on site of building materials and hard surfacing, to be inspected and approved in writing by the Local Planning Authority.
- Drawings at a scale of not less than 1:20 showing, where relevant to a Development Plot: details of fenestration (including framing and glazing details), reveals, sills and lintels; building entrances (including loading bays); shopfronts (including doors, stallrisers, glazing, fascia, awnings and indicative signage zones); balustrades (including terraces and balconies); roof top plant and plant screening, handrails, canopies, rainwater goods, louvres and vents.

Such details must demonstrate compatibility with the approved detailed drawings for the Development Plot. The development shall be constructed with the approved materials and in accordance with the approved details.

Reason: To ensure satisfactory standard of external appearance, in accordance with Policies, D4, D8, D9 and HC1 of the London Plan (2021), Policies DC2, DC3 and DC8 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

(18) Design Details (Sample Panel/Mock Up) – (Development Plots)

Prior to commencement of Above Ground Works for each building within a Development Plot (excluding cores), sample panels of all external facing materials to be used in the construction of the Building(s) shall be presented on site (or an alternative location agreed with the Local Planning Authority) and include a detailed schedule of such materials submitted to the Local Planning Authority for approval in writing.

A full-scale mock-up of the principal elements of the facades shall be constructed and presented on-site for inspection and approval by the Local Planning Authority. A detailed plan of the mock-up should be agreed with the Local Planning Authority prior to the construction of the mock-up. The development shall not be carried out other than in accordance with any such approval given.

Reason: In order that the Local Planning Authority can be satisfied that the consented development will be delivered to a high quality and make an appropriate contextual response to the site in accordance with Policies, D4, D8, D9 and HC1 of the London Plan (2021), Policies DC2, DC3 and DC8 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

(19) Detailed drawings – Boundaries (1:20)

Prior to the commencement of landscape works (excluding Below Ground Works) within a Development Plot, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of boundary walls, fences, railings, and gates shall be submitted and approved in writing by the Local Planning Authority and no part of the Development Plot shall be used or occupied prior to the completion of the relevant works in accordance with the approved details.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies, D4, D8, D9 and HC1 of the London Plan (2021) and Policies DC2, DC3 and DC8 of the Local Plan (2018).

(20) Detail of the top of the Tall Buildings – Roof Top Plant Enclosures (1:20)

Prior to the commencement of Above Ground Works for a building of 6 or more storeys within a relevant Development Plot, detailed drawings at a scale not less than 1:20 (in plan, section, and elevation) of the rooftop plant enclosures, shall be submitted to and approved in writing by the Local Planning Authority. No part of the relevant building shall be used or occupied until the enclosures have been constructed in accordance with the approved details, and the enclosures shall thereafter be permanently retained in this form.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D4, D8, D9 and HC1 of the London Plan (2021), and Policies DC2, DC3 and DC8 of the Local Plan (2018).

(21) Glazing Specification (Development Plot)

Prior to the relevant parts of the works commencing for each building within a Development Plot, details of the glazing specification for the building facades shall be submitted to and approved in writing by the Local Planning Authority. The details shall demonstrate that the shading achieves a glass that has a sufficient 'G-value', meaning that it will appear clear. The works shall subsequently proceed in accordance with the approved details and shall be retained for the lifetime of the development unless otherwise approved in writing by the Local Planning Authority.

Reason: To safeguard the appearance of the buildings and the character and appearance of the wider area, in accordance with Policies D4, D9 and HC1 of the London Plan (2021) and Policies DC2, DC3 and DC8 of the Local Plan (2018).

(22) Flood Risk Assessment (Detailed Component)

Prior to commencement of Below Ground Works within Development Plots WB03, WB04 and WB05, proposed flood resilience measures to inform mitigation of elevated groundwater levels beneath the Site shall be submitted to and approved in writing by the Local Planning Authority.

The development of Development Plots WB03, WB04 and WB05 shall be carried out in accordance with the Flood Risk Assessment for Development Plots WB03, WB04 and WB05 and Outline Flood Risk Assessment and Drainage Strategy (dated July 2024) and Flood Risk Assessment and Drainage Strategy Addendum (dated September 2025) and finished floor levels shall be set to 300mm above the breach level.

All measures shall be implemented in accordance with the approved details and shall be retained for the lifetime of the development.

Reason: To reduce the impact of flooding on the proposed development and future occupants in accordance with Policies SI 12 and SI 13 of the London Plan (2021) and Policies CC3 and CC4 of the Local Plan (2018).

(23) Surface Water Drainage Strategy (SuDS) – (Detailed Component)

Prior to commencement of Below Ground Works in Development Plots WB03, WB04 and WB05, full details of how surface water will be managed, including through the use of sustainable drainage (SuDS) measures, in accordance with the Drainage Statement WB03, WB04 and WB05 (dated July 2024) and Drainage Statement WB03, WB04 and WB05 Addendum (dated September 2025) shall be submitted to and approved in writing by the Local Planning Authority.

The details shall demonstrate that SuDS measures have been maximised for each Development Plot, in line with the London Drainage Hierarchy, and any discharge of surface water to the combined sewer network shall be limited to below greenfield rates. SuDS measures shall include, but not be limited to, rainwater harvesting for collection and re-use of surface water, use of infiltration techniques, soft landscaping including living roofs, permeable hard surfaces and attenuation storage and controlled release of stormwater. All measures shall be implemented in accordance with the approved details and shall be retained for the lifetime of the development.

Reason: To prevent any increased risk of flooding and to ensure satisfactory storage of and disposal of surface water from the site in accordance with Policies SI 12 and SI 13 of the London Plan (2021) and Policies CC3 and CC4 of the Local Plan (2018).

(24) Play Space, Landscaping & Public Realm (Development Plot)

Prior to commencement of the Above Ground Works within a Development Plot, details of the extent of play space, hard and soft landscape works and means of enclosure of all un-built, open areas and public realm shall be submitted to and approved in writing by the Local Planning Authority.

Play Space details shall include:

- a. Details of the on-plot play space equipment including access, location, relevant surface treatment and layout.
- b. The equipment proposed shall be inclusive for all and should be supported by seating for parents, carers and guardians.
- c. The details submitted shall include details of maintenance of play equipment and shall demonstrate that all residents will have access to the play equipment regardless of the tenure of their home.
- d. The play equipment shall be installed and operational prior to the first occupation of any residential unit within the development hereby approved and shall be maintained as such thereafter and permanently retained.

Hard Landscape details shall include:

- a. Details of proposed finished levels or contours including any alterations in existing ground levels.

- b. Means of enclosure and boundary treatments and any associated access points.
- c. Car parking layouts including details of temporary layouts.
- d. Details of all vehicle and pedestrian access points and circulation areas.
- e. Details of inclusive design including external steps and ramps, tactile warning or wayfinding paving, mobility features and dropped kerbs.
- f. Hard surfacing materials, including dimensions, bonding and pointing.
- g. Minor artefacts and structures e.g. street furniture, play equipment, refuse or other storage units, planters (fixed and moveable), bollards and hostile vehicle mitigation.
- h. General arrangement plan of functional services above and below ground including service trenches, drainage, power (such as in ground power units,
- i. operating controls and feeder pillars), communications cables, pipelines etc.
- j. indicating lines, access covers and supports to ensure no conflicts with tree and planting pits and integration of access covers with paving/surfacing layout.
- k. Details of all short-stay cycle parking; and
- l. Materials samples of all areas of hard landscaping.

Soft Landscape details shall include:

- a. Planting plans including plant schedules, noting species (to include appropriate riverine species in locations to water bodies), plant sizes including girth and clear stem dimensions of trees and proposed numbers/densities where appropriate of shrubs and plantings.
- b. Written specifications including cultivation and other operations associated with
- c. plant and grass establishment.
- d. All planting systems including tree pits, containers and planting beds demonstrating plant stabilisation, drainage (including proposals to link with SuDs strategy), aeration/irrigation, volume and specification of growing medium, tree pit surfacing and measures for protection of planting beds during establishment
- e. Ecological initiatives such as bird boxes, native species planting and log piles.
- f. Biodiversity enhancements; and
- g. Implementation programme including time of year for planting.

The hard and soft landscaping works shall be delivered in accordance with the approved details prior to the first occupation/use within the Development Plot(s) and shall be retained as such for the lifetime of the development thereafter.

Reason: To ensure that the development is provided with tenure blind, high quality, accessible play provision for all ages and achieves a high quality of landscaping and greening which contributes to the visual amenity, biodiversity and character of the area in accordance with NPPF, Policies S4, D3, D4, D8, D9, G5, G6, G7 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC8, OS2, OS3 and OS5 of the Local Plan (2018) and with H&F's Climate Change SPD Policy KPC17.

(25) Planting Replacement

Any trees, shrubs or planting which die, are removed, or become seriously damaged and diseased within a period of ten years from completion of the Development Zone, shall be replaced in the next planting season with others of similar size and species.

Reason: To ensure that the development retains a high quality of landscaping and greening which contributes to the visual amenity, biodiversity and character of the area in accordance with NPPF, Policies S4, D3, D4, D8, D9, G5, G6, G7 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC8, OS2, OS3 and OS5 of the Local Plan (2018) and with LBHF's Climate Change SPD Policy KPC17.

(26) Play Space (Provision - Detailed Component)

Prior to the first occupation of any residential unit within Development Plots WB04 and WB05 hereby approved, the play space to be provided for Development Plots WB04 and WB05 shall be delivered in accordance with the approved details and shall be retained as such for the lifetime of the development thereafter. The play space shall be calculated and provided in accordance with relevant formula set out in the Mayor of London Play and Informal Recreation SPG (2012).

Reason: To provide opportunities for play and recreation in accordance with Policy S4 of the London Plan (2021) and Policy OS3 of the Local Plan (2018).

(27) Inclusive Access Management Plan (Development Plot)

Prior to the first occupation of any residential or commercial use, within a Development Plot hereby approved, an Inclusive Access Management Plan for the relevant Development Plot shall be submitted to and approved in writing by the Local Planning Authority.

The Inclusive Access Management Plan shall set out a strategy for ongoing consultation with specific interest groups regarding accessibility of the relevant part of the site. The plan will include details of access, wheelchair accessible provision, public realm, car parking, cycle parking, fire evacuation strategy and facilities to accommodate hearing and sight impairments. The development shall not be operated otherwise than in accordance with the Inclusive Access Management Plan as approved and thereafter be permanently retained in this form for the lifetime of the development.

Reason: To ensure that the proposal provides an inclusive and accessible environment in accordance with the Policy E10 of the London Plan (2021) and Policy DC2 and E3 of the Local Plan (2018).

(28) Level Threshold (Development Plot)

Prior to the first occupation of any residential or commercial use within a Development Plot hereby approved, the ground floor entrance doors to the buildings and integral lift/stair cores shall be provided and not be less than 1-metre-wide and the threshold shall be at the same level as the adjoining ground level fronting the entrances to ensure level access.

Reason: To ensure the development provides ease of access for all users, in accordance with Policy E10 of the London Plan (2021) and Policies DC2, E3 and HO6 of the Local Plan (2018).

(29) Fire Strategy (Detailed Component)

Development Plots WB03, WB04 and WB05 hereby approved shall be carried out and completed in accordance with the following Fire Statements.

- Fire Statement WB03: Revision 01 - prepared by OFR (July 2025)
- Fire Statement WB04: Revision 01 - prepared by OFR (July 2025)
- Fire Statement WB05: Revision 01 - prepared by OFR (July 2025) and
- Gateway 1 Form WB03, WB04 & WB05: Revision. 01 - prepared by OFR (July 2025)

These details shall be implemented prior to occupation and shall thereafter be permanently retained in this form.

Reason: To ensure full compliance with, in accordance with Policy D12 of the London Plan (2021).

(30) Lifts (Development Plot)

Prior to first occupation of any building of 6 storeys or more, details of fire-rated lift(s) in each of the buildings shall be submitted to and approved in writing by the Local Planning Authority.

Details shall include loading lifts to the basement levels and the measures to ensure that at least one lift per core will always operate and that no wheelchair occupiers are trapped if a lift breaks down. The fire rated lifts shall be installed as approved and maintained in full working order for the lifetime of the development.

Reason: To ensure continuous, reliable access to the building for the lifetime of the development and respond to the needs of people with disabilities, in accordance with Policies D5 and D12 of the London Plan (2021) and Policies DC1 and HO6 of the Local Plan (2018).

(31) Building Maintenance Units (BMU)

Prior to the occupation of each building within Development Plots WB03, WB04 and WB05, details of the proposed Building Maintenance Units, including window cleaning equipment for each relevant building, shall be submitted to and approved in writing by the Local Planning Authority.

The details shall include the appearance, means of operation and storage of the Building Maintenance Units. Each building shall not be used or occupied until the equipment has been installed in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

(32) BREEAM/Home Quality Mark (Detailed Component)

Prior to commencement of the relevant works for Development Plots WB03, WB04 and WB05, details of the proposed sustainability measures shall be provided in a

revised Sustainability Statement, in line with the commitments set out in the submitted Sustainability Statements dated July 2024 and Addendums dated September 2025 for each Plot.

Each revised Sustainability Statement shall detail how each development plot will implement the required measures to achieve the relevant sustainability performance levels for that Plot, such as BREEAM rating “Excellent” as a minimum, with an aspiration to meet “Outstanding” and a Home Quality Mark rating of 4 as minimum with an aspiration to achieve a rating of 5, to demonstrate achievement of specified sustainability performance standards.

Reason: In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies G5, G6, SI 1, SI 2, SI 3, SI 4, SI 5 and SI 7 of the London Plan (2021) and Policies CC1, CC2, CC7 and CC10 of the Local Plan (2018).

(33) Post Construction Certification

Within 6 months of the occupation of any of the buildings hereby permitted, the relevant post construction sustainability assessment report (BREEAM or Home Quality Mark) confirming that those buildings containing non-residential uses, achieve the minimum required ratings shall be submitted for approval in writing by the Local Planning Authority.

Reason: In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies G5, G6, SI 1, SI 2, SI 3, SI 4, SI 5 and SI 7 of the London Plan (2021) and Policies CC1, CC2, CC7 and CC10 of the Local Plan (2018).

(34) Energy Statement (Detailed Component)

Prior to commencement of above ground works in Development Plots WB03, WB04 and WB05, details of the proposed energy and carbon reduction measures shall be provided in a revised Energy Statement in line with the commitments set out in the submitted Energy Strategy (July 2024) and Energy Strategy Addendum (July 2025).

Each revised Energy Statement shall detail how each plot will implement carbon reduction measures in line with the London Plan Energy Hierarchy and achieve net zero carbon through the inclusion of energy efficiency measures, connection to the site-wide ambient loop heat network and use of on-site renewable energy generation where this is feasible.

Reason: In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies SI 2, SI 3 and SI 4 of the London Plan (2021) and Policies CC1, CC2 and CC7 of the Local Plan (2018).

(35) Circular Economy Statement (Detailed Component)

The development hereby approved for Development Plots WB03, WB04 and WB05 shall be built in accordance with the Whole Lifecycle and Circular Economy Strategy (July 2024) and the Whole Lifecycle and Circular Economy Strategy: Addendum (July 2025).

Within 3 months of the occupation of any of the buildings within Development Plots WB03, WB04 and WB05, a post-construction monitoring report shall be completed in line with the GLA's Circular Economy Statement Guidance and submitted to and approved in writing by the Local Planning Authority.

Reason: To maximise the re-use of materials and in the interests of sustainable waste management, in accordance with London Plan Policy SI 7 (2021).

(36) Whole Life-Cycle Carbon Assessment (Detailed Component)

The development hereby approved for Development Plots WB03, WB04 and WB05 shall be built in accordance with the Whole Lifecycle and Circular Economy Strategy (July 2024) and the Whole Lifecycle and Circular Economy Strategy: Addendum (July 2025).

Within 3 months of the occupation of any of the buildings on Development Plots WB03, WB04 and WB05, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template shall be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. Together with any supporting information, it shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of sustainable waste management and to maximise the re-use of materials and energy conservation and reduction in carbon emissions, in accordance with London Plan Policy SI 2 (2021).

(37) Blue Badge Parking (Detailed Component)

Prior to the first occupation of each building within Development Plots WB03, WB04 or WB05 hereby approved, the 17 blue badge accessible parking bays shall be installed and made available for eligible residents in accordance with the approved plans. The blue badge parking bays shall be permanently retained as such for the lifetime of the development and made available for use by holders of a valid blue badge, at no additional cost to the occupier.

Reason: To ensure the provision and retention of disabled car parking facilities, in accordance with Policies D5, T6, T6.1, T6.4 and Policy T6.5 of the London Plan (2021) and Policies E3, HO6, T1 and T5 of the Local Plan (2018).

(38) Cycle Parking (Development Plot)

Prior to the first occupation of each building, full details of the cycle parking and associated facilities shall be submitted to and approved in writing by the Local Planning Authority. The details shall include, but not be limited to:

- a. Provision of accessible cargo bike parking spaces with cargo bike stands at ground floor level.
- b. The secure, covered, level and weatherproof storage for a long stay bicycle within an easily accessible part of the building, with larger cycle spaces to be provided at grade for ease of access.
- c. The secure cycle parking for short-stay bicycle users at grade.
- d. Provision of safe routes for pedestrians and cyclists to travel within the basement car park and provision of alternative access, to remove conflict with vehicles.
- e. Provision for cycle storage areas to be step-free from outside and inside.

- f. Facilities to include cyclist storage lockers and equipment for basic maintenance, such as pumps, water, changing and lockers.

The approved cycle storage / parking facilities shall be completed prior to the first occupation of any residential unit within the Development Plot and permanently accessible for the storage of bicycles for residents and, where applicable, visitors for the lifetime of the development.

Reason: To ensure the suitable provision of cycle parking within the development to meet the needs of future site occupiers and users, in accordance with Policy SI 1 and T5 of The London Plan (2021), Policy T5 and T7 and CC10 of the Local Plan (2018).

(39) Waste Storage (Detailed Component)

Prior to the occupation of each building within the Detailed Component, provision for the storage and collection of refuse shall be made in full accordance with the approved drawings. The refuse facilities shall be maintained in their approved form permanently thereafter.

Reason: To ensure the satisfactory provision for refuse storage and recycling in accordance with policy CC6 of the Local Plan (2018) and the Council's Planning Guidance Supplementary Planning Document (2018).

(40) NATS (Detailed Component)

No construction works above 90 metres from ground level on any building within the Detailed Component shall be carried out until a Radar Mitigation Scheme has been implemented and the Detailed Component shall thereafter be operated in accordance with such approved Scheme.

Reason: In the interests of aircraft safety and the operations of Heathrow Airport and NATS En-route PLC.

RESERVED MATTERS - SUPPORTING STATEMENTS

(41) RMA: ES - Statement of Conformity

Each application for Reserved Matters Approval shall be accompanied by a Reserved Matters Environmental Statement ('ES') Statement of Conformity to demonstrate accordance with findings of the July 2024 ES and August 2025 ES Addendum.

Reason: In line with the Environmental Statement (ES) which was produced in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('The 2017 EIA Regs')

(42) RMA: Basement Impact Assessment

Each application for Reserved Matters Approval that proposes Below Ground Floorspace shall be accompanied by a Basement Impact Assessment (BIA), prepared by a suitably qualified individual. The development shall be implemented in accordance with the recommendations and mitigation measures contained within the approved assessment.

The BIA must include a detailed proposal and methodology in relation to all below ground works for drainage and groundwater would be managed and mitigated during construction (dewatering) and post construction (permanent phase) to ensure no increase in risk on or off site. The BIA will include details of structural impacts, flooding and drainage matters, as well as construction impacts. The development will be carried out and maintained in accordance with the details approved.

Reason: To ensure any basement structures are designed in a safe and appropriate manner and avoid any undue amenity impacts in accordance with NPPF (2024), Policy D10 of the London Plan (2021) and Policies CC11 and CC13 of the Local Plan (2018).

(43) RMA: Design and Landscaping Statement

Each application for Reserved Matters Approval shall be accompanied by a Design and Landscaping Statement, including the following:

- a. Compliance with the Design Code and maximum parameters
- b. An Inclusive Design Statement
- c. Play space provision (where this is relevant to the application for RMA)
- d. Schedule of compliance with London Plan and Local Plan housing design standards (where this is relevant to the application for RMA)

Reason: To ensure that the proposal provides an inclusive and accessible environment in accordance with NPPF (2024), Policies D4, D5, D6, D7, D8, D9 and E10 of the London Plan (2021) and Policy E3 of the Local Plan (2018).

(44) RMA: Sustainability Statements

Each application for Reserved Matters Approval (where relevant) shall be accompanied by a Sustainability Statement which demonstrates compliance with the targets and objectives set out in the Sustainability Strategy dated July 2024 and Sustainability Strategy Addendum dated July 2025. The Sustainability Statement shall set out details of but not limited to:

Development Plot Level

- Embodied carbon
- UGF reconciliation against site-wide provision
- Water use Intensity
- Sustainability Certifications
- Building reuse and retention
- Construction waste
- Material use

Site-Wide Level

- Landscape water use and recycling
- Public realm & infrastructure
- Air quality

Reason: In the interests of energy conservation and wider sustainability, in accordance with Policies G5, G6, SI 1, SI 2, SI 3, SI 4, SI 5 and SI 7 of the London Plan (2021) and Policies CC1, CC2, CC7 and CC10 of the Local Plan (2018).

(45) RMA: Energy Statements

An Energy Statement shall be submitted with each application for Reserved Matters Approval (where relevant) for each Development Plot which demonstrates compliance with the targets and objectives set out in the Energy Strategy dated July 2024 and Energy Strategy Addendum dated July 2025. The Energy Statement shall set out details of but not limited to:

Development Plot Level

- Operational energy and carbon
- Energy Hierarchy

Site-Wide Level

- Energy network performance
- Cumulative CO₂ emissions
- Energy Hierarchy

Reason: In the interests of energy conservation, reduction of CO₂ emissions and wider sustainability, in accordance with Policies SI 2, SI 3 and SI 4 of the London Plan (2021) and Policies CC1, CC2 and CC7 of the Local Plan (2018).

(46) RMA: Air Quality Positive Statement

Each application for Reserved Matters Approval (where relevant) shall be accompanied by an Air Quality Positive Statement which includes an Implementation and Monitoring Plan. The Implementation and Monitoring Plan will detail monitoring and reporting requirements to ensure the measures outlined in the Air Quality Positive Statement are implemented.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(47) RMA: Flood Risk / Drainage Statements

Each application for Reserved Matters Approval shall be accompanied by a RMA Flood Risk Assessment and Drainage Statement that includes hydraulic calculations for storm durations and return periods. Details provided shall include:

- On-going groundwater monitoring, triggers and mitigation.
- Existing drainage arrangements and details of proposed SuDS elements, including proposed discharge rates.
- Accordance with Flood Risk Assessment and Drainage Strategy (dated July 2024) and Flood Risk Assessment and Drainage Strategy Addendum (dated September 2025).

Reason: To reduce the impacts of flooding to the Development and future occupants, in accordance with Policies SI 12 and SI 13 of the London Plan (2021) and Policies CC3 and CC4 of the Local Plan (2018)

(48) RMA: BREEAM / NABERS / WELL Building / Home Quality Mark

Each application for Reserved Matters Approval shall be accompanied by reports that demonstrate the achievement of the sustainability performance standards for BREEAM, NABERS, WELL Building and Home Quality Mark as set out in the

Sustainability Strategy prepared by dated July 2024, and Sustainability Strategy Addendum dated August 2025. Wherever possible the aspirational targets set out for each of these environmental assessment methods should be achieved.

Reason: In the interests of energy conservation, reduction of CO2 emissions and wider sustainability, in accordance with Policies G5, G6, SI 1, SI 2, SI 3, SI 4, SI 5 and SI 7 of the London Plan (2021) and Policies CC1, CC2, CC7 and CC10 of the Local Plan (2018).

(49) RMA: Whole Lifecycle Carbon Assessment

Each application for Reserved Matters Approval shall be accompanied by a Whole Life-Cycle Carbon Statement in line with the GLA's Whole Life-Cycle Assessment Guidance. The statement shall adhere to the principles set out in the Whole Life-Cycle Carbon Strategy dated July 2024 and Whole Life-Cycle Carbon Strategy dated July 2025. The development shall be carried out in accordance with the details so approved.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policy SI 2 of the London Plan (2021). In the interests of sustainable development and to maximise on-site carbon dioxide savings.

(50) RMA: Whole Lifecycle Carbon Assessment Post-Construction Monitoring

Within 3 months of the first occupation of each phase of the development, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template shall be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance and together with any supporting information, it shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policy SI 2 of the London Plan (2021).

(51) RMA: Circular Economy

Each application for Reserved Matters Approval shall be accompanied by a Circular Economy Statement in line with the GLA's Circular Economy Statement Guidance. The statement shall adhere to the principles set out in the outline Circular Economy Statement. The development shall be carried out in accordance with the details so approved.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policy SI 2 of the London Plan (2021).

(52) RMA: Circular Economy Post Construction Monitoring

Within 3 months of the first occupation of each Development Zone hereby approved, a post-construction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The report shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policy SI 2 of the London Plan (2021).

(53) RMA: Internal Daylight/Sunlight/Overshadowing Assessment

Each application for Reserved Matters Approval in respect of a Development Plot containing Residential Units shall be accompanied by an internal Daylight, Sunlight and Overshadowing Assessment in respect of the final design for each relevant Development Plot and any mitigation measures required.

Reason: To ensure suitable measures are incorporated into the final design, to mitigate potential daylight/sunlight/overshadowing effects on the functional quality of the buildings, open spaces in the development and on the amenities of surrounding residential occupiers, in accordance with Policies D8 and D9 of the London Plan (2021), Policies DC2 and DC8 of the Local Plan (2018).

(54) RMA: Microclimate Assessment

Each application for Reserved Matters Approval in respect of a Development Plot shall be accompanied by a Microclimate Assessment. The Microclimate Assessment shall set out microclimate mitigation measures necessary to provide an appropriate wind environment.

Reason: To ensure that suitable measures are incorporated to mitigate potential adverse wind environments in terms of the functional quality of the buildings and open spaces in the development, in accordance with Policies D8 and D9 of the London Plan (2021), Policies DC2 and DC8 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

(55) RMA: Fire Statement

Notwithstanding the contents of the Fire Strategy dated September 2025, each application for Reserved Matters Approval in respect of a Development Plot shall be accompanied by an RMA Fire Statement for the relevant Development Plot and shall demonstrate compliance with Policies D5 and D12 of the London Plan (2021) (as amended).

The RMA Fire Statement shall be prepared by a suitably qualified assessor and shall detail how the proposed development would function in terms of:

- a. The building's construction: methods, products and materials used, including manufacturers' details.
- b. Access for fire service personnel and equipment: how this will be achieved in
- c. an evacuation situation, water supplies, provision and positioning of
- d. equipment, firefighting lift, stairs and lobbies, any fire suppression and smoke
- e. ventilation systems proposed, and the ongoing maintenance and monitoring
- f. of these.
- g. Means of escape for all building users including suitably designed stair cores,
- h. escape for building users who are disabled or require level access together
- i. with the associated evacuation strategy.
- j. Features which reduce the risk to life including fire alarm systems, passive
- k. and active fire safety measures and associated management and
- l. maintenance plans.
- m. How provision will be made within the site to enable fire appliances to gain
- n. access to the building.
- o. Ensuring that any potential future modifications to the building will take into

- p. account and not compromise the base build fire safety/protection measures.
- q. Provide details of any green or living wall, including how this element would be irrigated and maintained. Unless otherwise justified, the irrigation system serving any green wall be linked to fire detection, alarm and suppression measures and sprinkler systems.

The Fire Statement shall be implemented in accordance with the approved details prior to the occupation of the development plot and permanently retained thereafter.

Reason: In the interests of fire safety and to ensure the safety of all building users, in accordance with Policies D5 and D12 of the London Plan (2021).

(56) RMA: Noise Impact Assessment

Each application for Reserved Matters Approval in respect of a Development Plot shall be accompanied by a Noise Impact Assessment that includes details of external noise levels (including reflected and re-radiated noise) and details of the sound insulation of the building envelope. Details shall be provided to demonstrate that internal rooms and external amenity spaces will comply with BS8233:2014.

Approved details shall be implemented prior to occupation of the Development Plot and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by external noise sources, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

(57) RMA: Inclusive Design Statements

An Inclusive Design Statement shall be submitted with each Reserved Matters application (where relevant) for each Development Zone. The statement shall explain how each Building or Development Plot would achieve the highest standards of accessible and inclusive design.

The Inclusive Design Statement shall set out a strategy for ongoing consultation with specific interest groups (including Access for Disability) regarding accessibility of the relevant part of the site. The plan will include details of access, wheelchair accessible provision, public realm, car parking, cycle parking, fire evacuation strategy and facilities to accommodate hearing and sight impairments. The development shall be carried out and operate in accordance with the Inclusive Design Statement as approved and thereafter be permanently retained in this form.

Reason: To ensure that the proposal provides an inclusive and accessible environment in accordance with NPPF (2024), Policies D5 and E10 of the London Plan (2021) and Policy E3 of the Local Plan (2018)

(58) RMA: Design – Materials/1:20 Details

Prior to commencement of above ground works within a Development Plot, the following details shall be submitted to and approved in writing by the Local Planning Authority.

- a. Specifications and samples (where appropriate) of external facing building materials including ground and above ground surfaces, including roof treatments.
- b. Sample panels shall be constructed on site of building materials and hard surfacing, to be inspected and approved in writing by the Local Planning Authority.
- c. Drawings at a scale of not less than 1:20 showing, where relevant to a Development Plot: details of fenestration, reveals, sills and lintels; building entrances (including loading bays); shopfronts (including doors, stallrisers, glazing, fascia's, awnings and indicative signage zones); roof plant and/or terraces; balconies; external plant, rainwater goods, louvres and vents.

Such details must demonstrate compatibility with the approved drawings for Development Plots approved in detail and approved Design Code for Development Plots approved in outline. The development shall be constructed with the approved materials and in accordance with the approved details.

Reason: To ensure satisfactory standard of external appearance, in accordance with Policies D3, D4, D8, D9 and HC1 of the London Plan (2021), Policies DC1 and DC8 of the Local Plan (2018) and guidance contained within the Planning Guidance Supplementary Planning Document (2018).

(59) RMA: Photovoltaic Panel details

Each application for Reserved Matters Approval in respect of a Development Plot that includes photovoltaic (PV) panels shall be accompanied by details of the PV system on the relevant building(s) at a scale no less than 1:20 in plan, section and elevation. Such details shall be implemented prior to occupation or use of the relevant building and shall be retained thereafter.

Reason: To ensure that the development is consistent with the Mayor's sustainable design objectives, to ensure a satisfactory external appearance and to prevent harm to the street scene and public realm, in accordance with Policies SI 2, SI 3, D1, D4 and D9 of the London Plan (2021), Policies CC1, AMDC2 and DC8 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

(60) RMA: Green/Blue Roofs

Each application for Reserved Matters Approval in respect of a Development Plot that includes green and/or blue roofs shall be accompanied by details of the types of roofs and a planting maintenance plan. The relevant Development Plot shall not be occupied until the scheme has been carried out in accordance with the approved details and shall thereafter be permanently retained in this form.

Reason: To ensure the provision of blue and green roofs in the interests of sustainable urban drainage and habitat provision, in accordance with Policies SI 12, SI 13, G1 and G6 of the London Plan (2021) and Policy OS5 and CC4 of the Local Plan (2018).

(61) RMA: Car Parking Management Plan

Each application for Reserved Matters Approval shall be accompanied by a Car Parking Management Plan. The RMA Car Parking Management Plan shall include details of the car parking provision associated with the land uses proposed by the application. Details shall include:

- a. Layout and numbers of car parking spaces, including any servicing bays and how off-street parking spaces within the Plot or Development Zone will be allocated, controlled and managed.
- b. A strategy for the allocation and management of Blue Badge parking spaces, including residents, staff, and visitors, based on verified need and a process for monitoring the demand for Blue Badge parking, and a commitment to provide additional on-site spaces up to a maximum of 10% in accordance with the London Plan (2021), where demand for additional parking days is demonstrated.
- c. Swept path analysis demonstrating suitability of car parking and servicing arrangements.
- d. The provision of electric vehicle charging infrastructure (including the location, number and specification of the proposed electric vehicle charging points / locations / new technologies, maintenance and management of the infrastructure.
- e. How informal car parking within the Development will be deterred and enforced against.
- f. Proposals for the monitoring and review of the use of disabled parking provision within the Plot or Development Zone to address fluctuating demand and how increased demand will be addressed including additional provision on-site.
- g. Proposals for monitoring and review of the operation of the Parking Design Management Plan and how it conforms with the site-wide Parking Design Management Plan.

The development shall be carried out in accordance with the relevant approved RMA Parking Management Plan, which may be updated from time to time following submission to and approval in writing by the Local Planning Authority.

Reason: To ensure that car parking, including Blue Badge provision, is managed in an inclusive and sustainable manner, in accordance with Policy T6 of the London Plan (2021) and Policy T3 of the Local Plan (2018).

(62) RMA: Cycle Parking Details

Each application for Reserved Matters Approval shall be accompanied by details of the cycle parking arrangements associated with the land uses proposed by the application. The details shall include:

- a. Location of cycle parking (long-stay, short-stay, cargo bikes and accessible cycle parking) for each block, relative to entrance points to the Development Plot.
- b. Type and quantum of cycle parking and how this relates to the London Plan (2021) or any future adopted London Plan standards
- c. Step-free access to all long-stay and accessible cycle parking areas
- d. Details of associated facilities for each block, including showers, lockers, drying rooms, power-assisted doors, and on-site maintenance equipment (e.g. air pumps and water points for cycle repairs)
- e. Details of security measures, lighting, signage, and management for the cycle facilities
- f. Arrangements to ensure safe and convenient use of the facilities
- g. Details of ongoing maintenance of the cycle parking
- h. Link to wider Car and Cycle Management Plan

The cycle parking shall be provided prior to occupation of the relevant Development Plot and maintained in this form unless agreed in writing by the Local Planning Authority.

Reason: To promote travel by sustainable modes of transport and to comply with Policy T5 of the London Plan (2021), Policy T3 of the Local Plan (2018) and the minimum cycle parking standards and the London Cycling Design Standards.

(63) RMA: Reconciliation Statement

Each application for Reserved Matters Approval shall be accompanied by a Reconciliation Statement which demonstrates compliance with the approved Development Specification and Maximum Parameters.

Reason: To ensure that the development is undertaken in accordance with the plans and documents approved herein and enable a mechanism to address potential future conflicts between overlapping planning permissions.

(64) RMA: Illustrative Reconciliation Plan

Each application for Reserved Matters Approval shall be accompanied by an Illustrative Reconciliation Plan to show the development proposed for Reserved Matters Approval alongside development approved for Detailed Permission and Reserved Matters Approval and remaining Development Plots for which Reserved Matters Approval is yet to be sought.

Reason: To ensure that the development is undertaken in accordance with the documents approved herein and enable a mechanism to address potential future conflicts between overlapping planning permissions.

(65) RMA: Heathrow Airport/NATS

Each application for Reserved Matters Approval above 90 metres above ground level shall not commence until the approved RMS has been implemented.

Reason: In the interests of aircraft safety and the operations of Heathrow Airport and NATS En-route PLC.

DEVELOPMENT ZONE(S) STRATEGIES

(66) Community Liaison Group

Prior to commencement of the development hereby permitted (other than any Preparatory or Advance Infrastructure Works approved pursuant to Condition 15), a Community Liaison Group shall be established and maintained for the duration of the construction works hereby approved, having the purpose of:

- a. Community engagement and liaison to be carried out prior to submission of the Construction Management Plan (CMP) and Construction Logistics Plan (CLP). Details of engagement to be submitted as an appendix to the CMP/CLP to identify concerns raised by residents and how these are addressed.
- b. Informing nearby residents and businesses of the building programme and progress of demolition and construction works for each phase of the development.

- c. Informing nearby residents and businesses of appropriate mitigation measures being undertaken as part of each phase of the development.
- d. Informing nearby residents and businesses of considerate methods of working such as working hours and site traffic.
- e. Providing advanced notice of exceptional hours of work, when appropriate.
- f. Providing nearby residents and businesses with an initial contact for information relating to the works and procedures for receiving/responding to comments or complaints regarding the development with the view of resolving any concerns that might arise.
- g. Providing telephone contacts for nearby residents and businesses 24 hours daily throughout the works for the development; and
- h. Producing a leaflet prior to the commencement of the development for distribution to nearby residents and businesses, identifying progress of the development and which shall include an invitation to register an interest in the Liaison Group.

The terms of reference for the Community Liaison Group shall be submitted to the Local Planning Authority for approval prior to commencement of any works on site. The Community Liaison Group shall meet at least once every quarter until completion of the development.

Reason: To ensure satisfactory communication with residents, businesses, and local stakeholders throughout the construction of the development, in accordance with Policies CC10, CC11, CC12, CC13, DC2, and T7 of the Local Plan (2018).

DEMOLITION WORKS

(67) Air Quality Environmental Monitoring Programme (AQEMP)

No development shall commence on any development plot hereby permitted until an Air Quality Environmental Monitoring Programme (AQEMP) is submitted to and approved in writing by the Local Planning Authority. The AQEMP shall include the following details:

- a) Details of a Baseline Air Quality Monitoring Report that includes comparison with respect to World Health Organisation (WHO) annual mean and twenty-four hour mean Air Quality Guideline Values for the air pollutants Nitrogen Dioxide (NO₂), Particulates (PM₁₀, PM_{2.5}) is completed by an independently appointed Environmental Consultancy for a period ending not more than 6 months prior to the commencement of any ground/enabling works at development
- b) Details of the pollutant to be monitored for, the type and location of monitoring, the equipment to be used, the duration of monitoring, Particulate (PM_{2.5}, PM₁₀) Site Action Levels (SAL), actions to be taken in response to an exceedance of SAL, communication of data to the public, content of an Environmental Monitoring Status Report (EMSR) and a full justification of each part of the AQEMP for the site and surroundings.
- c) Details of the submission of a monthly air quality monitoring report (MAQMR) by the 1st of each month and Annual Environmental Monitoring Status report (AEMSR) with reference to the World Health Organisation Air Quality Guideline Values for the

air pollutants Nitrogen Dioxide (NO₂), Particulates (PM₁₀, PM_{2.5}) and Ozone(O₃) by 31st January of each year to be submitted to, and approved in writing by, the Local Authority.

d) Details of the procedures that shall be implemented if during any works:

Any part of the monitoring programme ceases to operate for more than 24 hours; all works shall cease until such a time as the monitoring programme is fully operational

Any SAL is exceeded, on each occasion all works that may be contributing to an exceedance shall cease and actions required by the AQDMP implemented

If the EMSR recommends updates to the AQEMP an updated AQEMP shall be submitted to, and approved in writing by, the Local Planning Authority and thereafter the approved Air Quality Environmental Monitoring Programme, or any subsequent update, shall be fully implemented and permanently retained and maintained during the demolition and construction phases of the development.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(68) Air Quality Dust Management Plan (Demolition)

Prior to the commencement of the demolition phase within a development plot of the development hereby approved (excluding installation of solid timber hoarding and MCERTS compliant Particulate (PM_{2.5}, PM₁₀) monitors around the perimeter of the site), details of an Air Quality Dust Management Plan (AQDMP) in accordance with the Councils AQDMP Template 'E' shall be submitted to and approved in writing by the Local Planning Authority.

Approved details shall be fully implemented and retained and maintained during the demolition phases of the development.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(69) Air Quality - Non- Road Mobile Machinery (NRMM)

Prior to the commencement of any Demolition Works, details of the Non-Road Mobile Machinery (NRMM) to be used shall be submitted to and approved in writing by the Local Planning Authority. The NRMM shall have CESAR Emissions Compliance Verification (ECV) identification and shall comply with the minimum Stage V NO_x and

PM10 emission criteria of The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 and its subsequent amendments. This will apply to both variable and constant speed engines for both NOx and PM. An inventory of all NRMM shall be registered on the London GLA NRMM register GLA-NRMM-Register.

Approved details shall be fully implemented and thereafter permanently retained and maintained until occupation of the complete development.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(70) Demolition Logistic Plan – Development Zone

Prior to the commencement of any Demolition Works within each Development Zone, a Demolition Logistics Plan (DLP) shall be submitted to and approved in writing by the Local Planning Authority. The DLP shall include the following minimum requirements:

- a. Site logistics and operations.
- b. Demolition vehicle routing.
- c. Details of the estimated number, size and routes of demolition vehicles per day/week.
- d. Details of the use of Ultra Low Emission Zone (ULEZ) compliant Vehicles e.g. Euro 6 and Euro VI and Direct Vision vehicles to star rating 4 or above
- e. Details of the access arrangements and delivery locations on the site.
- f. Details of any vehicle holding areas; and other matters relating to traffic management to be agreed as required.
- g. Efficiency and sustainability measures to be undertaken for the works.
- h. Membership of the Considerate Contractors Scheme (CCS) and published Code of Considerate Practice.

The works shall be carried out in accordance with the relevant approved DLP.

Reason: To minimise the impact of demolition works upon highway safety and the amenity of nearby residents, in accordance with Policy T7 of the London Plan (2021) and T1, T6 and T7 of the Local Plan (2018).

(71) Demolition Management Plan - Development Zone

Prior to the commencement of any Demolition Works within each Development Zone of the Development hereby approved, a Demolition Management Plan (DMP) shall be submitted to and approved in writing, by the Local Planning Authority. The DMP shall include:

- a. Details of location of site offices, ancillary buildings, plant, wheel-washing facilities, stacking bays and car parking.
- b. Storage of any skips.
- c. Oil and chemical storage.
- d. Membership of the Considerate Contractors Scheme and FORS Silver accreditation.

- e. Delivery locations and the proposed control measures and monitoring for noise, vibration, lighting, restriction of hours of work and all associated activities, audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800-1300 hrs on Saturdays and not on Sundays or Bank Holidays.
- f. Community sustainability and liaison to be carried prior to submission of the DMP to inform development of the DMP approach. Details of engagement are to be submitted as an appendix to the DMP to identify concerns raised by residents and how these are addressed.
- g. Details of the named person and contact responsible for advance notification to neighbours and other interested parties of proposed works, and the public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.
- h. Details shall also include the use of on road Ultra Low Emission Zone compliant Vehicles e.g. Euro 6 and Euro VI and Direct Vision vehicles to star rating 4 or above.
- i. Provisions within the site to ensure that all vehicles associated with the demolition works are properly washed and cleaned to prevent the passage of mud and dirt onto the highway.

The works shall be carried out in accordance with the approved DMP.

Reason: To ensure the amenity of surrounding occupiers is not adversely affected by noise, vibration, dust, lighting, or other emissions from the demolition works, in accordance with Policy D14 of the London Plan (2021), Policies DC1, DC12, CC6, CC7, CC10, CC11 and CC12 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

CONSTRUCTION WORKS

(72) Air Quality Dust Management Plan (Construction)

Prior to the commencement of the construction phase within each relevant development plot of the development hereby approved (excluding installation of solid timber hoarding and MCERTS compliant Particulate (PM_{2.5}, PM₁₀) monitors around the perimeter of the site), details of an Air Quality Dust Management Plan (AQDMP) in accordance with the Councils AQDMP Template 'F' shall be submitted to and approved in writing by the Local Planning Authority.

Approved details shall be fully implemented and retained and maintained during the construction phases of the development.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(73) Construction Logistic Plan (CLP) - Development Zone

Prior to the commencement of the Construction Works within each Development Zone of the Development hereby approved, a Construction Logistics Plan (CLP) shall be submitted to and approved in writing by the Local Planning Authority. The CLP shall include (but shall not be limited to) the following minimum requirements:

- a. Site access points.

- b. Location of site offices, ancillary buildings, plant, wheel-washing facilities, waste and chemical storage and parking.
- c. Construction vehicle routing.
- d. Contact details for site managers and details of management lines of reporting.
- e. Details of the estimated number, size and routes of construction vehicles per day/week including details of the use of Ultra Low Emission Zone (ULEZ) compliant Vehicles e.g. Euro 6 and Euro VI, including vehicles compliant with Direct Vision Standard star rating 4.
- f. Details of the access and egress arrangements per phase including any proposed temporary traffic and pedestrian management measures during construction.
- g. Delivery locations on the site e.g. details of any vehicle holding areas, restriction of vehicle numbers within any one hour; and other matters relating to traffic management to be agreed as required.
- h. Efficiency and sustainability measures to be undertaken for the works.
- i. Membership and details on CLOCS compliant site operations.
- j. Requirements for membership of industry accredited schemes such as FORS and Considerate Contractor.

The works shall be carried out in accordance with the approved CLP for each Development Zone.

Reason: To minimise the impacts of construction-related vehicle movements and facilitate sustainable construction travel to the site and ensure safety of the public highway and to ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting, or other emissions from the building site, in accordance with Policies T4 and T7 of the London Plan (2021) and Policies T1 and T6 and T7 of the Local Plan (2018).

(74) Construction Management Plan (CMP) – Development Zone

Prior to the commencement of the construction works within each Development Zone, a Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority. Each CMP shall include details of measures to mitigate environmental impacts including (but not limited to):

- a. Steps and procedures implemented to minimise impact of noise, dust and other air emissions resulting from the site preparation, demolition, and groundwork and construction phases of the development.
- b. Details and measures to control and monitor the emissions of air quality, noise, vibration and lighting, including restriction of hours of work and all associated activities, audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800-1300hrs on Saturdays, and not on Sundays or Bank Holidays.
- c. Hours of operation.
- d. The parking of vehicles of site operatives and visitors.
- e. Loading and unloading locations of plant and materials.
- f. Storage of plant and materials used in constructing the development including details of skips, oil and chemical storage.
- g. The erection and maintenance of security hoarding including decorative - displays and facilities for public viewing, where appropriate.
- h. Measures to manage infiltration and surface water run-off.

- i. Provisions within the site to ensure that all vehicles associated with the construction works are properly washed and cleaned to prevent the passage of mud and dirt onto the highway.
- j. Measures to control the emission and monitoring of noise and vibration during construction.
- k. Measures to control the emission of dust and dirt during construction/demolition.
- l. Waste classification and disposal procedures and locations.

The development shall be carried out in accordance with the approved CMP. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

Reason: To ensure that occupiers of surrounding premises are not adversely affected by noise, vibration, dust, lighting or other emissions from the building site in accordance with the NPPF, (2024) Policies GG3, G6, D14, SI 1, SI 8, SI 10 and T7 of the London Plan (2021), and Policies DC1, DC2, CC6, CC7, CC10, CC11, CC12 and CC13 of the Local Plan (2018).

CONTAMINATED LAND

(75) Preliminary Risk Assessment Report (Contaminated Land)

No works within a Development Zone (excluding Advanced Infrastructure and Preparatory Works approved pursuant to Condition 15) shall take place until a final Preliminary Risk Assessment (PRA) report based upon and targeting the risks identified in the Geo-Environmental Preliminary Risk Assessment (WSP, July 2024) is submitted to and approved in writing by the Local Planning Authority. This report shall comprise:

- a. A desktop study which identifies all current and previous uses at the site and surrounding area as well as the potential contaminants associated with those uses.
- b. A site reconnaissance.
- c. A conceptual model indicating potential pollutant linkages between sources, pathways and receptors, including those in the surrounding area and those planned at the site; and
- d. A qualitative risk assessment of any potentially unacceptable risks arising from the identified pollutant linkages to human health, controlled waters and the wider environment including ecological receptors and building materials.

All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks from land contamination are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy SD1 of the London Plan (2021), Policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

(76) Site Investigation Scheme (Contaminated Land)

No works within a Development Zone (excluding Advanced Infrastructure and Preparatory Works approved pursuant to Condition 15) shall take place until a Site Investigation Scheme (SIS) has been submitted to and approved in writing by the Local Planning Authority.

No works within a Development Zone shall take place until a Site Investigation Scheme (SIS) has been submitted to and approved in writing by the Local Planning Authority. The SIS shall be based upon and targeting the risks identified in the approved Preliminary Risk Assessment for the relevant Development Zone and shall make provision for, where relevant, the sampling of soil, soil vapour, ground gas, surface and groundwater.

All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks from land contamination are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy SD1 of the London Plan (2021), Policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

(77) Quantitative Risk Assessment Report (Contaminated Land)

Unless the Council agree in writing that a set extent of development must commence to enable compliance with this condition, no works within a Development Zone shall take place until a Quantitative Risk Assessment (QRA) report (written following a site investigation undertaken in compliance with the approved Site Investigation Scheme (SIS), has been submitted to and approved in writing by the Local Planning Authority. This report shall include the following:

- a. Assess the nature of any contamination identified on the Site through the approved SIS.
- b. Include a revised conceptual site model from the approved Preliminary Risk Assessment based on the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages and determine the risks posed by any contamination to human health, controlled waters and the wider environment.

All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks from land contamination are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy SD1 of the London Plan (2021), Policy CC9 of the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

(78) Remediation Method Statement (Contaminated Land)

Unless the Council agrees in writing that a set extent of development must commence to enable compliance with this condition, no works within a Development Zone shall take place until a Remediation Method Statement (RMS) has been submitted to and approved in writing by the Local Planning Authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment.

All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks from land contamination are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy SD1 of the London Plan (2021), Policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

(79) Verification Report (Contaminated Land)

No occupation or use of a Development Zone shall take place until the approved Remediation Method Statement has been carried out in full for land in that Development Zone and a Verification Report confirming these works has been submitted to, and approved in writing, by the Local Planning Authority. This report shall include the following:

- a. Details of the remediation work carried out.
- b. Results of any verification sampling, testing or monitoring including the analysis of any imported soil.
- c. All waste management documentation showing the classification of waste, its treatment, movement and disposal; and
- d. The validation of gas membrane placement.

If, during development, contamination not previously identified is found to be present at the site, the Local Planning Authority is to be informed immediately and no further development (unless otherwise agreed in writing by the Local Planning Authority) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is submitted to, and agreed in writing by, the Local Planning Authority. Any required remediation shall be detailed in an amendment to the Remediation Method Statement and verification of these works included in the Verification Report.

All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks from land contamination are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy SD1 of the London Plan (2021), Policy CC9 of the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

(80) Onward Long-Term Monitoring Methodology Report (Contaminated Land)

No occupation or use of a Development Zone shall take place until an onward long-term monitoring methodology report is submitted to and approved in writing by the Local Planning Authority to demonstrate that no residual adverse risks exist.

All works must be carried out in compliance with and by a competent person who conforms to LCRM: Land Contamination Risk Management (Environment Agency 2023) or the current UK requirements for sampling and testing.

Reason: To ensure that no unacceptable risks from land contamination are caused to humans, controlled waters or the wider environment during and following the development works, in accordance with Policy SD1 of the London Plan (2021), Policy CC9 the Local Plan (2018) and key principles LC1 to LC7 of the Planning Guidance Supplementary Planning Document (2018).

(81) Infrastructure Protection Network Rail / London Underground

No development shall take place within a Development Zone abutting the railway or Transport for London infrastructure (excluding Advanced Infrastructure enabling works and Preparatory Works approved pursuant to Condition 15) until a detailed design and method statement (in consultation with TfL Infrastructure Protection and/or Network Rail) for the foundations, lower ground, and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), shall be submitted to and approved in writing by the Local Planning Authority in consultation with London Underground and/or Network Rail.

All works within the Development Zone must thereafter be carried out in all respects in accordance with the approved design and method statements.

Reason: To ensure that the development does not impact on existing London Underground or Network Rail transport infrastructure, in accordance with Policy T3 of the London Plan (2021).

(82) WSI Archaeology – Stage 1

No Below Ground Works shall take place within a Development Zone until a Stage 1 Written Scheme of Investigation (WSI) for that Zone has been submitted to and approved in writing by the Local Planning Authority (in consultation with Historic England GLAAS).

No development shall take place for that Zone other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by the Stage 1 WSI, then for those parts of the Site which have archaeological interest, a Stage 2 WSI shall be submitted to and approved by the Local Planning Authority in writing.

For land that is included within the Stage 2 WSI, no development shall take place other than in accordance with the agreed Stage 2 WSI, which shall include:

- a) The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- b) The programme for post-investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material.

Reason: To safeguard the archaeological interest on this site and provide clarity on investigations required and their timing in relation to the development programme, in accordance with the NPPF, Policy HC1 of the London Plan (2021) and Policy DC8 of the Local Plan (2018).

(83) WSI Archaeology – Stage 2

No Below Ground Works shall take place within a Development Zone until details of an appropriate programme of public engagement that covers the relevant Zone has been submitted to and approved by the Local Planning Authority (in consultation with Historic England GLAAS). The approved programme must be implemented in accordance with a timetable set out in the programme.

Reason: To safeguard the archaeological interest on this site and provide clarity on investigations required and their timing in relation to the development programme in accordance with the NPPF, Policy HC1 of the London Plan (2021) and Policy DC8 of the Local Plan (2018).

(84) Piling Method Statement

No piling shall take place within a Development Zone hereby approved until a Piling Method Statement has been submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water). The Piling Method Statement shall include details of the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure and subsurface water infrastructure, and the programme for the works. Any piling must be undertaken in accordance with the terms of the approved piling method statement and layout plan.

Reason: The approved works will be in close proximity to underground sewerage utility infrastructure and underground water utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage and water utility infrastructure. To ensure compliance with Policies SI 12, SI 13 and SI 14 of the London Plan (2021) and Policy CC3 of the Local Plan (2018).

(85) Waste Capacity (Thames Water)

No Below Ground Works shall take place within a Development Zone until details have been submitted to and approved in writing by the Local Planning Authority, in consultation with Thames Water, that either waste capacity exists off site to serve the development, or all wastewater network upgrades required to accommodate the additional flows from the development has been completed prior to occupation of the development, or an infrastructure phasing plan has been agreed with Thames Water to allow the development to be occupied.

Reason: The development may lead to sewage flooding and Thames Water may need to undertake network reinforcement works to ensure sufficient capacity is provided to accommodate additional flows from the new development. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

(86) Water Infrastructure (Thames Water)

No Below Ground Works shall take place within a Development Zone until confirmation has been submitted to and approved in writing by the Local Planning Authority, in consultation with Thames Water, that either all water network upgrades required to accommodate the additional flows from the development has been completed, or an infrastructure phasing plan has been agreed with Thames water to allow the development to be occupied. Where an infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed infrastructure phasing plan.

Reason: The development may lead to no/low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

(87) Air Quality – Ventilation Strategy

Prior to commencement of above ground works within each relevant development plot of the development hereby permitted, a Ventilation Strategy Report to mitigate the impact of existing poor air quality for the Residential use (Class C3), Older Persons Housing use (Class C2), Student Accommodation use (Sui Generis), Education use (Class E(f)/F1), Medical Services use (Class E), and Office use (Class E) shall be submitted to and approved in writing by the Local Planning Authority. This is applicable to all receptor locations where World Health Organisation Air Quality Guideline Values for Nitrogen Dioxide, and Particulates (PM2.5, PM10) are exceeded and where current and future predicted pollutant concentrations are within 5% of these limits.

The report shall include the following information:

- a. Details and locations of the ventilation intake locations that are located as far as practicably possible from the sources of air pollution.
- b. Details and locations of ventilation extracts, to demonstrate that they are located a minimum of 2 metres away from the air ventilation intakes, to minimise the potential for the recirculation of extract air through the supply air ventilation.
- c. Details of the independently tested mechanical ventilation system with Nitrogen Dioxide (NO₂) and Particulate Matter (PM_{2.5}) filtration with air intakes on the rear elevation to remove airborne pollutants. The filtration system shall have a minimum efficiency of 90% in the removal of Nitrogen Oxides/Dioxides, and Particulate Matter (PM_{2.5}, PM₁₀) in accordance with BS EN ISO 10121-1:2014 and BS EN ISO 16890:2016.
- d. Details and locations of restricted opening windows (maximum 200mm for emergency purge ventilation only) for all habitable rooms (Bedrooms, Living

Rooms, Study) of the residential use (Class C3), Older Persons Housing use (Class C2), Student Accommodation use (Sui Generis) on all floors.

The whole system shall be designed to prevent summer overheating and minimise energy usage. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and shall be the responsibility of the primary owner of the property.

Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(88) Air Quality – Ventilation Strategy (Compliance)

Prior to occupation of within each relevant development plot of the development hereby permitted, details of a post installation compliance report including photographic confirmation of the mitigation measures as included in the approved ventilation strategy as required by condition 87 to mitigate the impact of existing poor air quality shall be submitted to and approved in writing by the Local Planning Authority. The report shall be produced by an accredited Chartered Building Surveyor (MRICS).

Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(89) Exhaust Flue Monitoring

Prior to the occupation within each relevant development plot hereby approved with research and development use (Class E(g)) permitted, details of an Exhaust Flue Monitoring Compliance Report (EFMCR) shall be submitted to and approved in writing by the Local Planning Authority. The report shall be produced by a United Kingdom Accreditation Service (UKAS) accredited MCERTS compliant Stack Emission testing organisation and shall include the following information:

- a. Details to demonstrate the flue volume discharge flow rate for each of the flues is a minimum of [1.0] m³/s
- b. Details to demonstrate the flue exhaust discharge velocity for each of the flues is a minimum of [10] m/s

Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(90) Air Quality – Secondary Mains - Secondary Mains Electricity Power/UPS supply compliance

Prior to occupation within each relevant Development Plot of the development hereby permitted, details of investigations into alternatives to HVO fuelled generators serving life safety systems shall be submitted in the form of a report. The report shall be building specific and if alternatives are not feasible, contain details of the reasons why this is the case.

Use of backup generator(s) is restricted to emergency use and operational testing (less than 50 hours per year).

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(91) Air Quality - Local Air Quality Building Emissions Heating/Cooling Plant compliance

Prior to occupation within each relevant Development Plot of the development hereby permitted, where these technologies have been assessed as being technically feasible and are proposed within a Plot design, details (including manufacturer specification, installation/commissioning certificates) of installed Ground Source Heat Pumps (GSHP), Air Source Heat Pumps (ASHP), Water Source Heat Pumps (WSHP), Battery Energy Storage Systems (BESS), and Thermal Energy Storage Systems (TESS) to be provided for space heating, cooling and hot water shall be submitted to the Local Planning Authority.

Details shall be fully implemented prior to the occupation/use of the Development Plot and thereafter permanently retained and maintained.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(92) Air Quality - Private Network Energy Microgrid (PNEM)

Prior to occupation of each relevant Development Plot of the development hereby permitted, details (including manufacturer specification) of the installed Rooftop Solar PV panels, where these have been proposed, on the residential accommodation (Use Class C3) shall be submitted to and approved in writing by the Local Planning Authority.

Approved details shall be fully implemented prior to the occupation/use of the development and thereafter permanently retained and maintained.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(93) Air Quality - Ultra Low Emission Strategy.

A minimum of three months prior to occupation within each relevant development plot of the development hereby permitted, an Ultra Low Emission Strategy (ULES) shall be submitted to and approved in writing by the Local Planning Authority. Details shall include:

- a) Procurement policy and processes for contractors and suppliers included in the DSP's for all commercial uses (Classes B8, C1, C2, E(a)/(b)/(c))/(d)/(e)/(f)/(g)), F.1, F2, Sui Generis), that will incentivise and prioritise the use of Zero Exhaust Emission Vehicles in accordance with the emission hierarchy of 1) Walking Freight (Electrically Assisted) carriage Trolleys 2) Cargo bicycles (3) Electric Vehicle.
- b) Use of Zero Exhaust Emission Vehicles for commercial use floorspace (Classes E, F1 and F2) in accordance with the emissions hierarchy (1) Walking Freight Trolleys (2) Cargo bike (3) Electric Vehicle.
- c) Reduction and consolidation of deliveries and collections (Classes B8, C1, C2, E(a)/(b)/(c))/(d)/(e)/(f)/(g)), F.1, F2, Sui Generis) e.g. Waste
- d) Re-timing of deliveries and collections for all commercial use floorspace ((Classes B8, C1, C2, E(a)/(b)/(c))/(d)/(e)/(f)/(g)), F.1, F2, Sui Generis)) outside of peak traffic time periods of 07:00-10:00 and 15:00-19:00 hrs
- e) Details of the installation of on-site commercial logistics facility and use of off-site commercial logistics consolidation centres.
- f) Facilities and measures for residential use (Class C3), Student Accommodation use (Sui Generis) and Older Persons Housing use (Class C2) will minimise the impact of vehicle emissions from increasing personal deliveries e.g., carrier agnostic parcel locker, concierge, Cargo bike bays, e-carriages etc.

The ULES shall be monitored and reviewed on an annual basis and any subsequent modifications or alterations to the ULES should be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to occupation and the ULES hereby permitted shall thereafter operate in accordance with the approved details.

Reason: To comply with the requirements of Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

ECOLOGY & LANDSCAPING

(94) Ecology (Landscape & Public Realm Specification & Management Plan)

Prior to the commencement of landscaping and public realm works within a Development Zone or other part of the Site not forming part of a Development Zone, a Landscape & Public Realm Specification and Management Plan shall be submitted to and approved in writing by the Local Planning Authority for all landscaped / public realm areas. The Landscape & Public Realm Specification and Management Plan shall include:

- a. Landscaping plans
- b. Details of all species within the planting schedule, including 50% native species planting with common and scientific name
- c. Provision of a natural wetland habitat (non-chlorinated pond)
- d. Management responsibilities, and

- e. Maintenance schedules for all landscape areas.

The planting schedule must not include any invasives, primarily those included on the London Invasive Species Initiative and Schedule 9, Part 2 of the Wildlife and Countryside Act 1981 (as amended). The use of herbicides and pesticides should be entirely avoided with exception to tackling invasive species.

The Landscape & Public Realm Specification and Management Plan shall be implemented in accordance with the approved specifications, and the features shall thereafter be permanently retained in this form.

Reason: To ensure the development meets the requirements set out in accordance with Policies G1, G4 and G6 of the London Plan (2021), Policies OS1, OS4 and OS5 of the Local Plan (2018) and KPC16 and KPC17 of the Climate Change SPD.

(95) Ecology (Landscaping of the Bio line)

Prior to the commencement of works which impact the West London Line (WLL), an Ecological Design Strategy (EDS) addressing development within the WLL (SINC) shall be submitted to and approved in writing by the Local Planning Authority.

The EDS shall include the following.

- a. Purpose and conservation objectives for the proposed works.
- b. Review of site potential and constraints.
- c. Detailed landscape design plans including details on habitat provision, SINC enhancement, areas inaccessible to people, ecological connectivity and provision for continued use by protected species.
- d. Extent and location/area of proposed works on appropriately scaled maps and plans.
- e. Type and source of materials to be used where appropriate, e.g. native species of local provenance.
- f. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g. Persons responsible for implementing the works.

The EDS shall be implemented in accordance with the approved details, and all features shall be retained in that manner thereafter.

Reason: To ensure the development meets the requirements set out in accordance with Policies G1, G4 and G6 of the London Plan (2021), Policies OS1, OS4 and OS5 of the Local Plan (2018) and KPC16 and KPC17 of the Climate Change SPD.

(96) Ecology (Protected Species)

Further supplementary ecological surveys shall be undertaken for each Development Zone or other part of the Site not forming part of a Development Zone, where work has not commenced within two years of the date of the Planning Permission.

This shall include an ecological walkover survey to assess the need for further surveys, followed by survey(s) for bats, badgers, nesting birds and other species and habitats, as deemed appropriate by an experienced ecologist.

This shall be undertaken to inform the preparation and implementation of corresponding phases of ecological measures and mitigation required through Condition(s).

The supplementary surveys shall be of an appropriate type for the above habitats and/or species, and survey methods shall follow current national good practice guidelines. Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures and mitigation will be revised, and a time approved ecological measures and timetable.

All surveys and undertakings shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development complies with the Chartered Institute of Ecology and Environmental Management best practice advice regarding the validity of Ecological Surveys. Ecological surveys are required to meet UK legislation that protects habitats and species, including the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2019

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Policies G1 and G6 of the London Plan (2021), Policy OS5 of the LBHF Local Plan (2018) and Schedule 7A of the Town and Country Planning Act 1990.

(97) Biodiversity Gain Plan

Prior to commencement of the Development (excluding Advance Infrastructure and Preparatory Works approved pursuant to Condition 14) an Overall Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority.

The Overall Biodiversity Gain Plan shall show how biodiversity gain will be achieved and where relevant, must include:

- a. Information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat.
- b. A breakdown of how each phase/zone will contribute to towards the overall biodiversity net gain achieved.
- c. The pre and post development biodiversity value of the onsite habitat.
- d. Any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development.
- e. Any biodiversity credits purchased for the development.
- f. Plans of the existing and proposed habitats.
- g. A valid metric calculation attached in Excel form, which demonstrates that the minimum 10% objective has been achieved.
- h. A description of how the Biodiversity Gain Hierarchy will be followed and where one or more actions in that hierarchy are not followed, the reasons why not (except for irreplaceable habitats).
- i. A description of any irreplaceable habitat on the land to which the plan relates which exist on the relevant date, and any part of the development for which planning permission is granted where the onsite habitat of that part is irreplaceable

habitat arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

- j. A statement whether habitat degradation has taken place, and if it has: a statement to this effect
- k. The date immediately before the degradation activity,
- l. The completed biodiversity tool showing the calculation of the biodiversity value of the onsite habitat on that date, and any available supporting evidence for the value.
- m. The post-development biodiversity value of the onsite habitat for the entire development and each phase of development; and
- n. Any such other matters as the Secretary of State may by regulations specify.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Policies G1 and G6 of the London Plan (2021), Policy OS5 of the Local Plan (2018) and Schedule 7A of the Town and Country Planning Act 1990.

(98) Biodiversity Gain Plan (Development Zone)

Prior to commencement of development within a Development Zone (excluding Advance Infrastructure and Preparatory Works approved pursuant to Condition 14), a Zone Biodiversity Gain Plan shall be completed for each phase and be submitted to and approved in writing by the Local Planning Authority. Where relevant, the Zone Biodiversity Gain Plan must include:

- a. A summary confirming the zone's contribution and progress towards the overall biodiversity net gain
- b. Information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat
- c. The pre and post development biodiversity value of the onsite habitat
- d. Any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development
- e. Any biodiversity credits purchased for the development
- f. Post-development plans for the phase of development showing the location of existing onsite habitat (including any irreplaceable habitats) and drawn to an identified scale and showing the direction of North
- g. A completed biodiversity metric calculation tool(s) stating the publication date of the biodiversity metric used and showing the calculation of the pre-development and post-development biodiversity values
- h. Information about the steps taken or to be taken to minimise the adverse effect of the phase of development on the biodiversity of the onsite habitat
- i. Arrangements for the maintenance and monitoring of significant onsite habitat enhancements
- j. A description of how the Biodiversity Gain Hierarchy will be followed and where any actions in that hierarchy are not followed, the reasons why not (except for irreplaceable habitats)
- k. A description of any irreplaceable habitat on the land to which the plan relates which exist on the relevant date, and any part of the development for which planning permission is granted where the onsite habitat of that part is irreplaceable habitat, a description of the arrangements for compensation for

any impact the development has on the biodiversity of the irreplaceable habitat;
and

- I. Any such other matters as the Secretary of State may by regulations specify.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Policies G1 and G6 of the London Plan (2021), Policy OS5 of the Local Plan (2018) and Schedule 7A of the Town and Country Planning Act 1990.

(99) Ecology: Habitat Management and Monitoring Plan (Commencement)

Prior to commencement of development within a Development Zone (excluding Advance Infrastructure and Preparatory Works approved pursuant to Condition 14), a Habitat Management and Monitoring Plan (HMMP), shall be completed and be submitted to and approved in writing by the Local Planning Authority.

The HMMP shall be prepared in accordance with the approved Zone Biodiversity Gain Plan and include the following:

- a. a non-technical summary
- b. the roles and responsibilities of the people or organisation(s) delivering the HMMP
- c. the planned habitat creation and enhancement work (including biodiverse roof and grassland mowing regime) to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan.
- d. location, and type of wildlife habitats (bird boxes, bat boxes, bug hotels, and habitats) to be provided, including details on those that would be built into the fabric of the buildings.
- e. proposed habitat details including species composition, requirements to reach the condition detailed in the metric, distinctiveness and any additional features such as log piles
- f. accompanying plans of the site boundary, baseline and proposed habitats, provided in GIS format
- g. the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- h. the methodology and frequency of the monitoring to be submitted to the Local Planning Authority in respect of the created or enhanced habitat.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Policies G1 and G6 of the London Plan (2021), Policy OS5 of the LBHF Local Plan (2018) and Schedule 7A of the Town and Country Planning Act 1990.

(100) Arboricultural Method Statement (AMS)

Prior to commencement of development within a Development Zone or other part of the Site not forming part of a Development Zone, an Arboricultural Method Statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority. The AMS shall include the following details:

- a. The means by which any retained trees on or directly adjacent to the Site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment. The method statements shall include details of facilitative

pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

- b. Cross sections to show surface and other changes to levels, engineering, foundation or construction details and any proposed activity within root protection areas or the influencing distance (30m) of local trees required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. All tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority.

All Arboricultural Supervisory elements are to be undertaken in accordance with the approved Arboricultural Method Statement site supervision key stages (BS: 5837 (2012)) for this site, as evidenced through signed sheets and photographs.

Reason: To protect the trees which are to be retained and in the interest of the visual amenities of the area.

TRANSPORT & HIGHWAYS

(101) Delivery and Servicing Management Plan - DSMP (Site Wide)

Prior to first occupation of the Development, a site-wide Delivery and Servicing Management Plan (DSMP), shall be submitted to and approved in writing by the Local Planning Authority. The DSMP shall detail:

- a. The management of deliveries to avoid peak times
- b. Emergency access
- c. Collection of waste and recyclables
- d. Times and frequencies of deliveries and collections
- e. Low noise reversing methods
- f. Location of loading bays and
- g. Vehicle movement, including vehicle tracking, in respect of the loading bays and service yards within the development.

The approved measures shall be implemented and thereafter retained for the lifetime of the residential or commercial uses in the relevant part of the site.

Reason: To ensure that satisfactory provision is made for refuse storage and collection and to ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by noise, in accordance with Policies T2 and T7 of the London Plan (2021) and Policies T2, CC11 and CC13 of the Local Plan (2018) and the LBHF SPD Key Principle TR28 (2018).

(102) Delivery and Servicing Plan - DSP (Development Plot)

Prior to first occupation of any residential or commercial use within a Development Plot, a Development Plot Delivery and Servicing Plan (DSP), for the relevant Development Plot shall be submitted to and approved in writing by the Local Planning Authority. The DSP shall include:

- a. Details of the classification and forecast numbers of vehicles that will enter and leave the premises daily.
- b. Arrangements for parking, loading, and unloading vehicles, including vehicle tracking.
- c. Details for recording all vehicles (including by type) entering and leaving the premises to transport goods from the premises.
- d. Arrangements to make available to the local highway authority details of vehicles recorded in accordance with the provisions of point (c) above.
- e. The appointment of a transport monitoring officer whether for the site as a whole or for each unit who will compile, and supply information requested by the local highway authority and will act as a liaison with the local highway authority in relation to vehicle movements.
- f. The management of deliveries, including collection of waste and recyclables (including times and frequencies of deliveries and collections and details of low noise reversing methods).
- g. Review of opportunities for either on site or off-site consolidation to reduce vehicle movements.
- h. Dependent on above, identification of viable consolidation strategies.
- i. Details of how future occupiers of the proposed development shall be informed of the various measures and strategies at the Site as set out in the over-arching document.
- j. Once occupiers are known, they will adhere to the strategies set out in the DSP and provide the same information. Occupiers will also:
- k. Sign and complete a DSP proforma document, setting out details of the specific Occupier, which can then be issued to the Local Planning Authority if occupiers change. This will set out contact details and a named person for the specific unit / occupier in that zone.

The approved Delivery & Servicing Plan shall thereafter be implemented in accordance with its agreed terms save as otherwise varied from time to time with the agreement of the local planning authority.

Reason: In order to ensure that satisfactory provision is made for refuse storage and collection and to ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by noise, in accordance with Policies T2 and T7 of the London Plan (2021) and Policies T2, CC11 and CC13 of the Local Plan (2018) and SPD Key Principle TR28 (2018).

(103) Operational Waste Management Strategy (OWMP)

Prior to the first occupation (excluding for Demolition Works and Advance Infrastructure and Preparatory Works pursuant to Condition 14) within a Development Plot, an Operational Waste Management Plan (OWSP) for the Development Plot shall be submitted to and approved in writing by the Local Planning Authority.

The WSP shall include details of waste storage, segregation, collection arrangements, access for collection vehicles, and measures to promote recycling and minimise waste generation in accordance with the Borough's relevant guidance. The approved Waste Management Plan shall be implemented in full prior to first occupation or use of the relevant part of the development and the implemented arrangements and measures shall be retained and maintained thereafter.

Reason: To ensure the provision of adequate facilities for the storage, handling and collection of waste and recyclables, and to promote sustainable waste management in accordance with Policy SI 7 of the London Plan (2021) and Policy CC3 of the Local Plan (2018).

OTHERS

(104) Secured by Design Certification (Development Plot)

Prior to occupation of each Development Plot (excluding Demolition Works and Advance Infrastructure and Preparatory Works approved pursuant to Condition 14), on either the approved Detail Component or for each Reserved Matters, details of security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design shall be submitted to and approved in writing by the local planning authority and shall be implemented in accordance with the approved details prior to occupation.

The development shall be registered with the Metropolitan Police for Secure by Design Certification. Within 3 months of the first occupation of the Development Plot, the Secured by Design Certification shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure development is delivered in accordance with secured by design principles in accordance with Policy D11 of the London Plan (2021) and Policy DC2 of the Local Plan (2018).

(105) Wayfinding Strategy

Prior to occupation of each Development Zone hereby approved, a Wayfinding Strategy shall be submitted to and approved in writing by the Local Planning Authority. The approved wayfinding strategy shall be implemented prior to operation of the relevant phase and maintained thereafter.

Reason: To assist in public navigation of the wider masterplan to ensure a consistent approach to its design and style in both boroughs.

(106) Lighting Strategy (Development Zone)

Prior to commencement of Above Ground Works in each Development Zone, an external Lighting Strategy (where lighting is proposed) shall be submitted to and approved in writing by the Local Planning Authority.

All external lighting shall be positioned and angled to prevent any light spillage or glare beyond the site boundary, likely to affect existing residential premises and natural receptors within the Site.

Such details shall include the number, exact location, height, design, and appearance of the lights, together with data concerning the levels of illumination and light spillage and the specific measures, having regard to the recommendations of the Institution of Lighting Professionals in the 'Guidance Note 01/21: Guidance Notes for the Reduction of Obtrusive Light' to ensure that any lighting proposed does not harm the existing amenities of the occupiers of neighbouring properties.

The Lighting Strategy shall also include:

- a. Identify those areas/features on site that are particularly sensitive for wildlife, and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b. Show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be demonstrated that areas to be lit will not disturb or prevent wildlife using their territory or having access to their breeding sites and resting places; and
- c. Show how external lighting has been designed in accordance with the 'Bats and Artificial Lighting at Night' Institute of Lighting Professionals Guidance Note (GN08/23).

All external lighting shall be installed in accordance with the specifications and locations set out in the Lighting Strategy for each Development Zone, and these shall be maintained thereafter in accordance with the Lighting Strategy.

Reason: To ensure high standards of lighting design, to protect the amenity of neighbouring residents and to prevent the development having any adverse impact on biodiversity, in accordance with NPPF, Policies D4, D8 & G6 of the London Plan (2021) and Policies DC2, DC3, CC12 and CC13 of the Local Plan (2018) and Key Principles of the Planning Guidance SPD (2018).

(107) Lights off (Commercial Buildings)

Prior to first occupation of any commercial use in each Development Zone, a scheme for the control and operation of the proposed lighting within a commercial use or building, during periods of limited or non-occupation, shall be submitted to and approved in writing by the Local Planning Authority. Details shall be implemented prior to the occupation of the relevant phase and operated only in accordance with the approved details.

Reason: To ensure that the building does not cause excessive light pollution and to conserve energy when they are not occupied, in accordance with Policy D9 of the London Plan (2021) and Policy CC12 of the Local Plan 2018.

(108) Outdoor Terraces: Hours of use

Any outdoor use of the terrace areas associated with non-residential uses shall only be used between 08.00 hours and 22.00 hours daily.

Reason: To ensure that control is exercised over the use of these terrace so that undue harm is not caused to the amenities of the occupiers of the development and neighbouring residential properties because of noise and disturbance, particularly in

the quieter night-time hours, in accordance with policy CC11 and CC13 of the Local Plan (2018) and guidance within the Planning Guidance Supplementary Planning Document (2018).

(109) Outdoor Seating

Prior to the commencement of a relevant Class E ground floor unit, details of the any proposed external seating area shall be submitted to and approved in writing by the Local Planning Authority. These details shall include the location, layout and capacity of the external seating area. The development shall be carried out in accordance with the approved details and retained as such thereafter.

The external seating area shall only be used between the hours of 07:00 and 20:00 daily.

Reason: To ensure a high-quality public realm, safeguard the amenity of neighbouring occupiers, and preserve the character and appearance of the area, in accordance with Policies DC1, DC2, CC11 and T7 of the Local Plan (2018), and the relevant guidance in the Planning Guidance SPD.

(110) Music/ Loud/ Amplified Voices

Prior to operation of any land uses that will result in commercial activity noise or music (e.g. flexible culture venues), details of the sound insulation of the structures separating the commercial facilities from any noise sensitive premises shall be submitted to and approved in writing by the Local Planning Authority.

Details shall demonstrate that the sound insulation and where necessary, additional mitigation measures implemented to contain commercial noise within the commercial premises and to achieve the relevant criteria BS8233:2014 is sufficient. Approved details shall be implemented prior to occupation of the relevant commercial unit and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

(111) Extraction and Odour Control system for non-domestic kitchens

Prior to first occupation of a commercial unit hereby approved containing a non-domestic kitchen, details shall be submitted to and approved in writing by the Local Planning Authority, of the installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet, in accordance with Appendix 4G of the LBHF Planning Guidance Supplementary Planning Document (February 2018).

Approved details shall be implemented prior to the commencement of the use of any non-domestic kitchens and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by cooking odour, in accordance with Policy CC13 of the Local Plan (2018).

(112) Anti-vibration Mounts

Prior to the installation of any machinery, plant/ equipment, extract/ ventilation system and ducting at any part of the development hereby approved, details of anti-vibration measures shall be submitted to and approved in writing by the Local Planning Authority.

The measures shall ensure that machinery, plant/ equipment, extract/ ventilation system and ducting are mounted with proprietary anti-vibration isolators and fan motors are vibration isolated from the casing and adequately silenced. Approved details shall be implemented prior to occupation of the relevant part of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan 2018.

(113) External Mechanical Noise

Prior to the commissioning of any building services plant within a Development Plot, a Noise Impact Assessment shall be conducted by a qualified acoustician and details of mitigation measures to be implemented to achieve limits in accordance with Environmental Assessment Chapter 11A (dated August 2025) shall be submitted and approved by the Local Planning Authority. The approved mitigation measures shall then be implemented and thereafter retained and maintained in accordance with the approved details.

Noise emitted by plant and building services, when operating concurrently or in individually, shall not increase the representative existing measured background LA90(15min) level measured or predicted at 1.0m from the nearest existing residential window and/or at a height of 1.2m above any adjacent residential garden, terrace, balcony or patio at any time when the plant is operating.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from plant/mechanical installations/ equipment, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

(114) Absolute noise criteria

The residential units hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise under normal ventilation conditions:

- Bedrooms: 35dB $L_{Aeq,16hour}$ during daytime (07:00-23:00) and 30 dB $L_{Aeq,8hour}$ and 45dB L_{AFmax}^* during night-time (23:00-07:00).
- Living rooms: 35dB $L_{Aeq,16hour}$ during daytime (07:00-23:00)
- [* refers to the night-time tenth highest individual L_{AMax} event measured, not a time-averaged or period total L_{AFMax}].
- Internal noise due to the ingress of noise from proposed building services systems under normal ventilation conditions shall not exceed a value that is:

- 5 dB lower the above, where noise from proposed building services systems is not intermittent and does not include prominent tonal features outside the proposed residential use.
- 10 dB lower the above, where noise from proposed building services systems is intermittent or includes prominent tonal features outside the proposed residential use.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan (2018)

(115) Separation of commercial and noise sensitive premises

Prior to commencement of the residential building in the development, details shall be submitted to and approved in writing by the Local Planning Authority, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

(116) Separation of noise sensitive rooms in neighbouring flats

Prior to commencement of above ground works relevant to the specific development zone or part thereof of the development zone (including the Detailed Component), details shall be submitted to and approved in writing by the Local Planning Authority, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings.

Approved details shall be implemented prior to occupation of the relevant parts of the development and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by household/neighbour noise transmission to adjoining dwellings at unreasonable levels due to unsuitable layout and arrangement of rooms and communal areas, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

(117) All vibration sensitive uses

Prior to completion of substructure works within each Development Plot or Development Zone, adjacent to the railway, details of building vibration levels generated by the adjacent railway together with appropriate mitigation measures, where necessary, shall be submitted to and approved by the Local Planning Authority.

The criteria to be met and the assessment method shall be as specified in BS 6472:2008 and shall not exceed those of Table 1 of BS 6472:2008 for 'low probability

of adverse comment'. No part of the development shall be occupied until the approved details have been implemented. Approved details shall thereafter be permanently retained.

Reason: To ensure that the development does not impact on existing transport infrastructure, in accordance with Policy T3 of the London Plan (2021).

(118) Aerials and Satellite Dishes

Prior to first occupation of each Development Plot, details of any aerials and satellite dishes for the relevant building or buildings within the Development Plot shall be submitted and approved in writing by the Local Planning Authority. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that principal Order with or without modification), no additional aerials, antennae, satellite dishes or related telecommunications equipment shall be erected on any part of the relevant part of the development hereby permitted.

Reason: To ensure that the visual impact of telecommunication equipment upon the surrounding area and heritage assets can be considered, in accordance with Policies DC1 and DC8 of the Local Plan (2018)

(119) Airwaves Interference Study

Prior to commencement of Above Ground Works in a Development Plot (other than any Advance Infrastructure & Preparatory Works pursuant to Condition 14 and Demolition Works), the following details shall be submitted to and approved in writing by the Local Planning Authority:

- a. The completion of a Base-Line Airwaves Interference Study (the Base-Line Study) to assess airwave reception within/adjacent to the site; and
- b. The implementation of a Scheme of Mitigation Works for the purpose of ensuring nil detriment during the Demolition Works and Construction Works identified by the Base-Line Study. Such a Scheme of Mitigation Works shall be first submitted to and approved in writing by the Local Planning Authority.

The development shall be implemented in accordance with the approved details for that Development Plot and shall be retained for the lifetime of the development in this form.

Reason: To ensure that the existing airwaves reception is not adversely affected by the proposed development, in accordance with Policy D11 of the London Plan (2021), and Policies DC1, DC2 DC3 and DC8 of the Local Plan (2018).

(120) Post-Construction Airwaves Study

Prior to the occupation of each Development Plot the following information shall be submitted and approved in writing by the Local Planning Authority:

- a. The completion of a Post-Construction Airwaves Study (the Post-Construction Study) to minimise detrimental impacts to airwaves reception attributable to the development.

b. The implementation of a Scheme of Mitigation Works for the purpose of ensuring no material impact to the airwave reception attributable to the development identified by the Post-Construction Study, shall take place within 3 months of the submission of the Post Construction Study. Such Scheme of Mitigation Works shall be first submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the existing airwaves reception within/adjacent to the development site is not adversely affected by the proposed development, in accordance with Policy D11 of the London Plan (2021) and Policies DC1, DC2, DC3 and DC8 of the Local Plan (2018).

(121) Heathrow/NATS)

Prior to commencement of a Development Plot the Development hereby approved (other than Demolition Works and Advanced Infrastructure and Preparatory Works pursuant to Condition 14), a Crane Strategy shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Heathrow Airport, National Air Traffic Services (NATS) and the CAA). Such a strategy shall include the following:

- Details of cranes and other tall construction equipment (including the details of obstacle lighting)
- Details of compliance with Advice Note 4 'Cranes' (available at <http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf>).

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Construction equipment on the site and adjoining land does not breach the aerodrome safeguarding surfaces associated to Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.

Reason: In the interests of aircraft safety and the operations of Heathrow Airport and NATS En-route PLC.

RECOMMENDED REASONS FOR APPROVAL

The reasons for this grant of planning permission or other planning related decision are as follows:

1) Principle of Development/ Opportunity Area & Regeneration Area designation:

The principle of a comprehensive mixed use redevelopment of the Earls Court Development Site including residential, student accommodation, co-living accommodation offices (including research and development), retail, hotel, leisure, healthcare, education, community and culture uses is considered to be acceptable

and in accordance with national, strategic and local planning policies, which advocate making the most efficient use of brownfield land in sustainable locations in order to help meet local and strategic housing needs. The proposed development would contribute to the regeneration of the area, improve employment opportunities, and promote sustainable economic growth. The size and location of the proposed retail floorspace are considered not to compromise the vitality or viability of surrounding centres. The proposed development would be an appropriate mix of uses within the Earl's Court and West Kensington Opportunity Area which is well served and accessible by public transport. In this case, consent is sought for a wide range of employment and other commercial, and infrastructure uses which will sit alongside the delivery of a minimum yield of homes (including genuinely affordable homes at the point of delivery). The development is considered suitable for transformative intensification and delivery of homes, economic opportunities, and the social infrastructure that supports good growth and delivers sustainable and inclusive regeneration. Such an approach is considered to accord with the general policy objectives for Opportunity Areas, and the ECWKOA in particular, and is therefore acceptable in principle, subject to detailed assessment of the proposals against the Development Plan, national planning policy and all other material planning considerations. The proposed development is therefore considered acceptable in accordance with Policy SD1, GG1, GG2, GG4, GG5, H1, S1 and S2 of the London Plan (2021) and Policies FRA, FRA 1, E1, HO1, HO6 and CF1 of the Local Plan (2018) which requires development to fully realise growth and regeneration potential within Opportunity Areas, to maximise the delivery of new homes including affordable housing and create mixed and inclusive communities, support development which creates employment opportunities, and provide the necessary social and other infrastructure to sustain growth.

(2) Housing:

The proposed development would deliver up to 3,900 (Class C3) homes across the entirety of the Earls Court Development site, with up to 2,500 homes allocated in LBHF and 1,400 homes in RBKC. It is considered that the development would contribute to the overall housing delivery target for the borough and the regeneration area asset out in Policy HO1 of the Local Plan which promotes the development of new housing within the Strategic Sites, and policies FRA and FRA1 of the Local Plan for developments within the Earl's Court and West Kensington Opportunity Area which set an indicative housing target of 7,000 homes in the Fulham Regeneration Area (Strategic Policy FRA) requiring the wider regeneration of the Earl's Court area and seeking to ensure an increase in residential accommodation.

The proposals support existing residents by offering a mix of new housing options with varying sizes and tenures.

- The proposal would contribute to the overall housing delivery targets for the borough and the regeneration area.
- The proposal provides a range of unit sizes which are considered to respond positively to the site characteristics and the wider demographics and would lead to a development that would maintain a mixed and balanced ward.
- The residential element of the Proposed Development would provide private amenity for future occupants together with a high standard of residential accommodation.

- The density is acceptable, given the location and transport accessibility of the site and the acceptable quality of the residential accommodation

In the context of these policies and having regard to the Viability Assessment, the individual circumstances of the site and the planning and regeneration benefits arising it is considered that the provision of affordable housing is acceptable in accordance with London Plan policies which require a range of housing choice and seeks to maximise affordable housing provision. The proposed development would contribute towards providing much needed additional housing in accordance with Policies H1, H4, H11, H12, H13, H15 and H16 of the London Plan (2021) which seek to increase housing supply and would help the borough meet its housing targets in accordance with Table 4.1 of the London Plan.

(3) Affordable Housing:

The scheme would deliver 456 new residential units in the detailed component including 35% affordable homes comprising a mix of social rented and intermediate tenures and overall, the development would provide 35% of affordable housing on the site. This is supported by a Financial Viability Assessment in order to maximise the delivery of much needed affordable housing within the borough. The affordable housing offer has been independently assessed and represents the maximum reasonable provision, taking into account the site-specific constraints and overall viability of the scheme. The proposal is therefore considered to be in accordance with the NPPF; Policies H1, H4, H6 and H10 of the London Plan (2021); and Policy HO3 of the Local Plan (2018).

(4) Purpose Built Student Accommodation (PBSA):

Officers consider that the student accommodation use is appropriate in the Earl's Court and West Kensington Opportunity Area. The quality of the student accommodation within the Detailed Component is of an acceptable level and will meet an identified need as well each of the relevant criteria set out in the development plan. 35% of the accommodation would be affordable as set out within the London Plan and an Education Provider and nominations agreement will be secured by legal agreement prior to occupation together with a final Student Management Plan. As such the proposed student accommodation use is supported in land use terms subject to the satisfaction of other development plan policies and is considered to be in accordance with the NPPF; Policies GG1, GG2, SD1, H1, and H15 of the London Plan (2021) and Policies FRA, FRA 1 and HO9 of the Local Plan (2018)

(5) Standard of Accommodation:

All residential units would be required to meet or exceed the minimum internal space standards set out in the London Plan. The scheme provides a good standard of residential amenity, with access to private and communal amenity space, and high levels of compliance with daylight and sunlight standards. The development would provide inclusive and accessible homes, with 10% of units designed as wheelchair user dwellings and the remainder as accessible and adaptable dwellings. The proposed development, on balance, accords with Policies D3, D5, D6 and D7 of the London Plan (2021) and Policies DC2, HO4, HO6 and HO11 of the Local Plan (2018) and Key Principles HS6 and HS7 of the Planning Guidance SPD.

(6) Offices including Research & Development Land Uses

The proposed development would provide an appropriate quantum of employment floorspace in accordance with Policies SD1 of the London Plan requiring the enhancement and increase in current office stock and the provision of sufficient land and premises to meet the future needs of different types of employment uses. It would also accord with policies FRA, FRA1 and E1 of the LBHF Local Plan which seek new employment opportunities in the Earl's Court and West Kensington Opportunity Area and require accommodation available for all sizes of business. The non-residential uses proposed would also offer opportunities for cultural and leisure uses and services to meet the needs of future occupiers. The proposed development therefore accords with Policies, requiring an appropriate mix of uses and economic growth and policies requiring the provision and enhancement of social and community uses.

(7) Local Economy and Employment:

The development would generate construction related full time equivalent (FTE) jobs over the build period and jobs once the development is complete and operational. The employment and training initiatives secured through the S106 agreement would bring significant benefits to the local area while a local procurement initiative will be entered into by way of the legal agreement to provide support for businesses. Furthermore, contributions through the community use for borough residents would have a positive effect on the borough. The development is therefore in accordance with Policies E2 and E3 of the London Plan (2021) and Policies E1 and E4 of the Local Plan (2018).

(8) Retail:

The proposed development proposes up to 14,000 sqm (GEA) Flexible Retail/F&B/Commercial floorspace which would provide a new and vibrant retail offer without an adverse impact on existing retail centres. The retail would also have place-making benefits contributing positively to the regeneration of the site and would serve the day-to-day needs of residents, employees and visitors to the development. The proposed development is therefore considered to be in accordance with policies of the London Plan regarding the location of retail development; Policy FRA1 of the LBHF Local Plan seeking to enhance the vitality and viability of Fulham Town Centre.

(9) Cultural / Community Initiatives:

The provision of cultural uses is a critical element of the redevelopment proposals and is welcomed response to the history of the site. The application is supported by a Cultural Strategy which sets out the context, offer and approach to delivery, which is only within the outline phases of the development. The proposed development is therefore considered to be in accordance with London Plan policy HC5 and Local Plan policies CF1 and FRA1 (Earls Court and West Kensington Opportunity Area).

(10) Design and Heritage:

It is considered that the proposals would deliver comprehensive development of the site located in the Earls Court and West Kensington Opportunity Area, part of the wider Fulham Regeneration Area, in accordance with the London Plan and the Council's Local Plan policies. The proposals are considered to optimise the capacity of the site to deliver good quality residential, commercial and community/cultural uses set within a high-quality public realm. This would improve the permeability, connectivity and legibility of the site as a new destination in West London. The proposed development

includes clusters of tall buildings located in the regeneration area and therefore is supported in principle by Local Plan Policy (2018) DC3 and London Plan (2021) Policy D9. Following careful assessment, it is not considered the development would have an unacceptably disruptive and harmful impact on the skyline, (although would result in some localised adverse impacts), and would comply with the impact frameworks of both policies. The tall buildings would be of a high-quality of architecture and design which would provide wayfinding and legibility to the Earls Court site for future residents and visitors. The proposals would however result in harm to the setting of adjacent heritage assets, in both LBHF and the adjacent borough, RKBC; in all instances this harm would be less than substantial harm. Whilst there are some heritage benefits which would partially outweigh this harm resulting from the development, it is the wider public benefits of the scheme which would outweigh this harm having regard to the relevant NPPF tests and applying the statutory provisions of sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The proposal is also considered to be in line with national guidance in the NPPG and strategic local policies on the historic environment and urban design. As such, the Proposed Development is considered acceptable having regard to the NPPF, NPPG, Policies D3, D4, D6, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3, DC7, DC8 and DC9 of the Local Plan (2018).

(11) Residential Amenity and Impact on Neighbouring Properties:

The impact of the proposed development upon adjoining occupiers and future occupiers is considered on balance to be acceptable. It is acknowledged that the proposal would result in some instances whereby losses of daylight and sunlight are recorded within adjacent developments and existing residential receptors. The resulting retained sunlight and daylight conditions within the most affected properties are considered to be typical of high-density, urban high-rise developments. Consideration has been given to Alternative Target Criteria.

Consideration has also been given to issues relating to noise/disturbance and outlook/overlooking/loss of privacy and in the round the impacts are not considered to be such as to warrant refusing planning permission, considering the wider benefits of the scheme. Potential impacts in terms of air quality, light pollution, wind tunnelling, noise or communications would be acceptable taking into account the various mitigation methods proposed which can be secured by condition. The development has been designed taking into account of the siting and proximity of adjoining sensitive receptors so as to reduce the potential for overlooking or loss of privacy where possible. In this regard, the development would respect the principles of good neighbourliness. The proposed development therefore accords with Policies D3, D6, D8 and D13 T4, D4, D11 and D14 of the London Plan (2021), Policies CC11, CC13, DC2, DC3, HO4 and HO11 of the Local Plan (2018) and Key Principle HS6 and HS7 of the Planning Guidance SPD.

(12) Transport:

Modelling of the development has shown that the resulting vehicle trip generation from these proposals would not result in unacceptable congestion of the surrounding road network. The development layout would integrate with surrounding roads.

The site is accessible and well served by public transport. The proposed development would enhance pedestrian linkages to the north-south and east-west of the site to the benefit of the wider Earl's Court and West Kensington Opportunity Area.

The level of car and cycle parking is assessed as being acceptable in accordance with the standards set by Policies T6 of the London Plan. The development is car-lite, with provision for essential Blue Badge parking only for residents together with visitor and car club spaces. It includes pedestrian and cycle infrastructure, improved permeability through the site, and enhanced connections to the surrounding area.

Any impacts arising from the development would be mitigated by conditions and s106 provision to contribute towards sustainable transport infrastructure measures within the Earl's Court and West Kensington Opportunity Area and prevent significant increase in on-street parking pressures in surrounding roads.

Car park management, servicing, road safety and travel planning initiatives would be implemented in and around the site to mitigate against potential issues.

Conditions would secure satisfactory provision of cycle storage and for the storage and collection of refuse and recyclables, controls on the demolition and construction works in terms of logistics and management. while Travel Plans would also be secured by conditions. The accessibility level of the site is very good and is well served by public transport. External impacts of the development would be controlled by conditions. In addition, servicing and road safety and travel planning initiatives would be implemented in and around the site to mitigate against potential issues.

A comprehensive package of transport mitigation measures, including travel plans, delivery and servicing plans, and construction logistics plans, would be secured by condition and planning obligation. The proposed development accords with Policies T1, T2, T5, T6, T6.1, T6.4, T6.5 and T7 of the London Plan (2021) and Policies T1, T2, T3, T4, T5 and T7 of the Local Plan (2018).

(13) Accessibility:

10% of the residential and student accommodation units would be wheelchair accessible and blue badge car parking spaces and cycle storage spaces for adapted/larger cycles would be provided on-site. The development would provide level access, and lifts to all levels and suitable circulation space. The proposal will provide a high-quality environment for disabled and impaired members of the community and the commitments within the Access Statement are positive and deliverable by way of conditions. An Inclusive Accessibility Management Strategy is secured by way of condition. Other conditions would ensure the proposal would provide ease of access for all persons, including those with mobility needs. The proposal will provide a high-quality environment for disabled and impaired members of the community and the commitments within the Accessibility Statement are positive and deliverable by way of conditions. Satisfactory provision is therefore made for users with mobility needs, in accordance with Policies D5, D7 and D11 of the London Plan (2021) and Policy H06 of the Local Plan (2018).

(14) Fire Strategy:

A Fire Strategy has been provided for the Detailed Component of the application to include a response to recent requirements of a second staircase and evacuation lifts. The HSE have considered the proposals and raise no objections to the latest amended

proposals. As such the proposal will comply with London Plan Policies E10, D5 and D12 Local Plan Policies DC1 and DC2 as well as Planning Guidance SPD Key Principles DA1, DA4, DA5, DA6, DA7, DA8, DA9, DA11, DA12 and DA13.

(15) Sustainability & Energy:

The submitted Sustainability Strategy and Energy Statement demonstrate how the development complies with policies and principles relating to sustainable development and carbon reduction. The proposed development has been designed to meet the highest standards of sustainable design and construction. The application proposes a range of measures to reduce CO2 emissions, including the integration of a site-wide heat network, in line with the London Plan Energy Hierarchy and its carbon reduction targets. Additional sustainability measures are also proposed for the site such as incorporation of water efficiency measures, use of sustainable building materials, sourced responsibly and including recycled materials. The development incorporates a comprehensive sustainability strategy, including an all-electric energy system powered by ground source heat pumps and photovoltaic panels, as well as the provision of green roofs. The submission of a revised Energy Strategy and Sustainability Statement is secured by condition to ensure the highest levels of sustainability and carbon reductions can be achieved. The broad outline of the Sustainability Statement and the commitments made to achieving high levels of sustainability and net zero carbon are considered to be acceptable for the outline component of the application. However, more detailed Sustainability Statements and Energy Assessments will be required with the Reserve Matters Applications to show compliance with policies in place at the time. The detailed component of the scheme achieves a 71% CO2 reduction for the residential elements of the detailed plots and 65% CO2 reduction for the non-residential beyond Building Regulations and will necessitate a carbon offset payment to meet net zero. BREEAM 'Excellent' ratings are proposed to be achieved for the non-residential uses. The proposed development accords with Policies SI 1, SI 2, SI 3 and SI 4 of the London Plan (2021) and Policies CC1 and CC2 of the Local Plan (2018).

(16) Whole Lifecycle Carbon Assessments and Circular Economy Statements:

The Development has provided a commitment to implementing measures to reduce waste and carbon emissions through the construction and demolition phases as well as once the buildings are occupied, helping to reduce carbon emissions and support the circular economy. The proposed development therefore accords with policies SI 1, SI 2, SI 3, SI 4, SI 5, SI 7, SI 12, SI 13, G5 and G6 of the London Plan requiring development to meet net zero carbon targets and to meet the highest standards of sustainable design. Local Plan Policy CC1 which requires developments to reduce their carbon dioxide emissions and make the fullest possible contribution to the mitigation of climate change, and Policy CC2 which requires the implementation of sustainable design and construction measures in all major developments, are also considered to be met in broad terms.

(17) Flood Risk:

Most of the site is in Flood Zone 3 which indicates a high risk to flooding from the River Thames. However, the site is well defended from this form of flood risk by the Thames Barrier and the local river wall defences. A Flood Risk Assessment and Surface Water Drainage Strategy have been submitted which consider risks of flooding to the site and identify suitable mitigation measures, including the use of a range of sustainable

drainage measures to reduce discharge of surface water into the combined sewer system. In broad terms, the information submitted, and commitments provided are acceptable subject to further details being provided for each phase of the development. The development would therefore be acceptable in accordance with Policies SI 12 and SI 13 of the London Plan covering flood risk management and sustainable drainage and Policies CC3 and CC4 of the Local Plan which deal with similar requirements.

(18) Land Contamination:

The application proposes that the site would be remediated to an appropriate level for the sensitive residential and open space uses. Additional information for developments on contaminated land and ensuring the protection of future users of contaminated land will be required on a Development Plot basis. Conditions will ensure that the site would be remediated to an appropriate level for the sensitive residential and open space uses. The proposed development will therefore accord with Policy CC9 of the Local Plan (2018) which requires the protection and enhancement of environmental quality.

(19) Archaeology:

The site is not located within a locally defined Archaeological Priority Area. The Greater London Archaeological Advisory Service (GLAAS) support the conclusion that there is low potential for part of the site to contain archaeology remains. A condition will secure the implementation of a programme of archaeological work by way of a watching brief throughout relevant construction times. The proposed development therefore accords with Policy HC1 of the London Plan (2021) and Policies DC1 and DC8 of the Local Plan (2018) which require new development to protect the borough's heritage assets and protect important archaeological remains.

(20) Air Quality:

There will be an impact on local air quality because of the advanced preparatory works, demolition, construction and operational phases of the proposed development. However, conditions imposing requirements prior to the commencement of above ground works for each phase of the development are included to mitigate the effects of the development. During demolition and construction, an Air Quality Dust Management Plan for these works is required by condition which will mitigate the air quality impacts of the development. In addition, a contribution toward the monitoring of air quality during the construction works to assist with mitigating against potential issues is secured through the S106 Agreement. The Air Quality Assessment shows that there is no significant impact on local air quality during the operational phases with additional mitigation. It is noted that there is not expected to be an exceedance of the one-hour objective at any on-site location, where there is relevant exposure, and the air quality neutral target is met. As such the proposed development can accord with Policy SI 1 of the London Plan (2021) and Policy CC10 of the Local Plan (2018).

(21) Arboriculture, Ecology and Biodiversity:

As part of the development new trees/shrubs will be planted within the public realm and within the roof terraces. The new public realm incorporates recommendations to enhance the biodiversity value such as the inclusion of wildlife planting as part of the landscaping and a biodiverse roof. Conditions are secured to provide additional mitigation measures through the materials and landscaping. Subject to the inclusion

of conditions the proposed development accords with Policies D8, D9, G5 and G7 of the London Plan (2021) and Policies OS1 and OS5 of the Local Plan (2018) in terms of ecological and urban greening.

(22) Security:

No objections are received from the Designing Out Crime Officer. The overall security strategy and design intent is considered acceptable at this stage, and the next stage of the process is to continue dialogue with the applicant and architects to agree the detail of measures to be incorporated within the development. A condition would ensure the development would provide a safe and secure environment for all users. The proposals are considered to be well designed and in accordance with the NPPF, Policy D11 of the London Plan (2021) and Policy DC1 of the Local Plan (2018).

(23) Microclimate:

The Detailed Component of the development would not result in an unacceptable wind microclimate that would cause harm, discomfort or safety issues to pedestrians or the environment around the buildings or surrounding properties. Further testing is required for the Outline Component. The proposal is considered to comply with Policies GG1, D8 and D9 of the London Plan 2021 and Policies DC3 and CC2 of the Local Plan 2018

(24) Environmental Impact Assessment:

The Environmental Statement, subsequent Environmental Statement Addendum and the various technical assessments together with the consultation responses received from statutory consultees and other stakeholders and parties, enable the Council to determine this application with knowledge of the likely significant environmental impacts of the proposed development.

(25) Objections:

Whilst many issues have been raised by objectors to the scheme, it is considered for the reasons explained in the detailed analysis, that planning permission should be granted for the application subject to appropriate safeguards to ensure that necessary controls and mitigation measures are established. This decision is taken on the basis of the proposed controls, mitigation measures and delivery commitments contained in the draft conditions and Heads of Terms for the Section 106 Agreement set out in this committee report, which are considered to provide an adequate framework of control to ensure as far as reasonably practicable that the public benefits of the scheme will be realised in accordance with relevant planning policies whilst providing the mitigation measures and environmental improvements needed to address the potential impacts of the development.

Having regard to these relevant policies of the statutory development plan and all other material considerations including all environmental information put forward under the EIA process, officers consider that subject to completion of the section 106 agreement prior to the grant of permission and the imposition of conditions, the development will achieve the comprehensive regeneration of the Earls Court and West Kensington Opportunity area in accordance with the Council's planning policy objectives and those of the Mayor of London.

(26) Conditions:

In line with the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, officers have consulted the applicant on the pre-commencement conditions included in the agenda and the applicant has raised no objections.

(27) Planning Obligations:

The development would be subject to a Section 106 agreement securing affordable housing, financial contributions towards employment and skills, carbon offsetting, highways improvements, air quality monitoring, and other site-specific mitigation measures. The application proposes that its impacts are mitigated by way of a comprehensive package of planning obligations to fund improvements that are necessary because of the increased use arising from the population yield from the development. The proposed development would therefore mitigate external impacts and would accord with Policies DF1, SI 2, SI 1, T4 and T7 of the London Plan (2021) and Policies CF1, CC10, T1 and T2 of the Local Plan (2018).

(28) The Development Plan:

In the light of the policies referred to earlier in this section and in the rest of this Report, the Proposed Development accords with the Development Plan taken as a whole.

LOCAL GOVERNMENT ACT 2000 LIST OF BACKGROUND PAPERS

All Background Papers held by Andrew Marshall (Ext: 4841)

Application form received: 01.08.2024

Policy Documents:

- National Planning Policy Framework (NPPF) December 2024
 - The London Plan 2021
 - LBHF - Local Plan 2018
 - LBHF – Planning Guidance Supplementary Planning Document 2018
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REPORT

1. SUMMARY

- 1.1 The 'Earls Court' development site occupies an area of approximately 18 hectares and straddles two London boroughs: the London Borough of Hammersmith and Fulham ('LBHF' or 'LBHF') and the Royal Borough of Kensington and Chelsea ('RBKC'). The administrative borough boundary divides the Earls Court site from Lillie Road (south) to West Cromwell Road (north). 'Earls Court' is the largest brownfield site in the borough. The former Earls Court Exhibition Centre buildings, the Lillie Bridge Depot land ('LBD'), and extensive railway and underground infrastructure are present in the site.
- 1.2 The Earls Court & West Kensington area is allocated in the London Plan as an Opportunity Area and covers land in both LBHF and RBKC. The Earl's Court and West Kensington Opportunity Area ('ECWKOA') is a 38-hectare area identified by the Greater London Authority ('GLA'), supporting the delivery of 6,500 new homes and 5,000 new jobs by 2041. The site is in the Fulham Regeneration Area ('FRA') in the adopted Local Plan (2018) and is allocated as a strategic development site under Strategic Policies ('FRA') and ('FRA1').
- 1.3 In November 2013, two outline planning permissions ('OPPs'), one in RBKC and one in LBHF were granted for a large residential-led mixed-use development. The LBHF OPP included the West Kensington and Gibbs Green estate land and excluded the existing properties in Empress Place and 2-26 Lillie Road. In 2014, the first Reserved Matters Application ('RMA') was approved by both the boroughs for the development of the former exhibition land. Between 2015 and 2017, the two former exhibition centre buildings and most of the associated structures were demolished in LBHF and RBKC. This followed the submission of details and discharge of a planning condition to each borough, required by the OPPs, in connection to a Demolition Waste Management Plan ('DWMP'). The implementation of the OPPs did not progress any further post the demolition works. Except for temporary (meanwhile) uses, the former exhibition land has remained underutilised, awaiting redevelopment.
- 1.4 Planning permission is sought for the redevelopment of the 'Earls Court' development site. Two separate 'Hybrid' (part detailed / part outline) planning applications have been submitted, one to each borough. This report deals with the hybrid planning application submitted to Hammersmith and Fulham ('LBHF'), for a mixed-use regeneration scheme, across several categorised character areas, comprising a mixture of residential, commercial, leisure and entertainment uses, and open spaces. A similar hybrid application has been submitted to the Royal Borough of Kensington and Chelsea (RBKC). Both applications are supported by a series of strategies, reports, assessment documents, including an Environmental Impact Assessment and drawings that have been prepared by specialist consultants.

- 1.5 The Earls Court Development Company ('ECDC') was set up in 2019. ECDC is responsible for managing the proposed redevelopment proposals. This has included the preparation and submission of the planning application. The application has been submitted on behalf of Earls Court Partnership Limited ('ECPL' or 'The Applicant') who own the greatest portion of the site. In 2019, the Applicant took ownership of part of the site from the previous landowners, in a joint venture with Delancey (on behalf of its client funds) and APG (a Dutch pension fund). The rest of the land within the 'Earls Court' site is owned by Transport for London ('TfL') and comprises the Lillie Bridge Depot land.
- 1.6 In 2020, Hawkins Brown and Studio Egret West were appointed as masterplan architects, to develop a vision for the site and to lead on the outline components. Sheppard Robson, Serie and dRMM architects, along with landscape design architects Stig Lennart Andersson, have prepared the detailed components in LBHF.
- 1.7 ECDC's vision sets out the objective of 'bringing the wonder back to Earls Court.' ECDC's engagement with the community and stakeholders is based on this value and four key priorities:
- Open the former Exhibition Centre site for the first time in 150 years – giving back to local communities.
 - A showground of world class ingenuity – celebrating its legacy and history.
 - Create a better piece of city – a blueprint for future generations.
 - Addressing the climate emergency – an ambition to go beyond net-zero
- 1.8 Plus, 4 place pillars:
- **Nature:** A celebration of nature and its ability to connect and revive
 - **Innovation:** A showcase for climate and clean technology innovation and skills
 - **Culture:** A cultural ecosystem for the future of talent
 - **Neighbourhood:** An inspiring neighbourhood designed for all stages of life.
- 1.9 In addition to the four place pillars, the objectives in the Earls Court Sustainability Charter focus on social value, economic inclusion, and environmental sustainability.
- 1.10 The Earls Court development is one of the largest redevelopment sites in London. It would create a diverse mix of jobs and homes, together with ancillary shops, leisure activities and cultural facilities, alongside public realm and open spaces.
- 1.11 The planning application to LBHF was received on 1 August 2024, a decade after the demolition of the former exhibition buildings. This followed the culmination of over 4 years of pre-application engagement with LBHF and RBKC, statutory bodies including the Greater London Authority (GLA), Transport for London (TfL), Historic England and other key stakeholders and businesses/residents. During this period, the applicant has carried out an extensive programme of community engagement, through a series of events

with local people, groups and businesses. Alongside four different design review panels, pre-application meetings have been held with key community stakeholders in both boroughs. This included the Hammersmith and Fulham Historic Building Group, the Fulham Society, the Hammersmith Society, the Lillie Road Residents Association and the Seagrave Road Residents Association.

- 1.12 The application submitted to LBHF is for the redevelopment of land bounded by North End Road, Beaumont Avenue, West Cromwell Road, the West London Line ('WLL'), Lillie Road, land comprising the Empress State Building ('ESB'), Aisgill Avenue, the former Gibbs Green School properties fronting Gibbs Green Close, and properties fronting Dieppe Close.
- 1.13 The RBKC application (to the east), is bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road, the West London Railway Line and 1 Cluny Mews.
- 1.14 The LBHF Hybrid Application ('Application Site' or 'site') is for a comprehensive mixed-use redevelopment of 10 hectares of land, linked to the adjoining land in RBKC. The application site does not include land on the West Kensington and Gibbs Green Estate.
- 1.15 The LBHF Hybrid Application is in part made up by a detailed component (Development Zone 'H') for three development plots: WB03, WB04, and WB05. The outline component covers the remainder of the site, with all matters reserved. Details relating to access, appearance, landscaping, layout and scale are reserved for subsequent approval ('Reserved Matters'). If outline permission is granted, a condition is proposed to secure the 'reserved matters' details for the access, appearance, landscaping, layout and scale. The hybrid application includes the demolition of some of existing buildings and structures.
- 1.16 The RBKC hybrid application or "RBKC Proposed Development" is an integral part of the wider Earls Court Development site. The application is formed by detailed development proposals for two development plots (EC05 and EC06) within Development Zone 'L' and outline development proposals for the remainder of the RBKC site.
- 1.17 Together the proposals in LBHF and RBKC envisage a comprehensive redevelopment of the site, linking both boroughs. The combined LBHF and RBKC hybrid applications seek planning permission for a maximum total of 712,031 square metres (GEA) of floorspace.
- 1.18 The supporting documents predict the development will be delivered in eight key phases, with an indicative build programme of approximately 19 years. The Early Phases, covering Phases 1-4 are anticipated to take 13 years (a completion target date: Q2 2037) with the whole development completed by Q2 2043.
- 1.19 The development would provide up to 3,900 new (Class C3) homes, including an affordable housing quantum (of 35%) and sizable areas of new public realm,

consistent with the aims of the policies set out in the London Plan (2021) and Local Plan (2018). The new homes proposed to be delivered in LBHF would range between 2,000 (minimum) and 2,500 homes (maximum). The proposed development would deliver a range of complementary land uses, including the creation of a significant amount of commercial floorspace, including affordable workspace.

- 1.20 This report describes and considers the proposed development, considering the development proposals in RBKC, and the combined impacts of both hybrid applications on the local area. The report considers the extent to which the application complies with the development plan, including how it addresses the key objectives of the London Plan and LBHF Local Plan. The report is set out in a series of sections listed in the contents page above, relating to the material planning considerations. More detail on each of the topics is set out in the body of the report and supported where relevant by additional information in Appendices to the report.
- 1.21 Due to the scale and nature of the proposed development, an Environmental Impact Assessment (“EIA”) was formally scoped, and an Environmental Statement (“ES”) has been submitted in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The EIA assesses the site (LBHF/RBKC) as a whole and the proposed development as a whole and is submitted in duplicate as part of the applications.
- 1.22 The Hybrid Planning Application was registered by the Council in August 2024. Consultation feedback has been received and considered from a wide range of sources, including the LPAs, statutory and non-statutory consultees, stakeholder groups and members of the public. In response to the comments received, the Applicant made a series of updates and changes to the Proposed Development. The Application was the subject of reconsultation in September 2025. For ease of reference, the proposed amendments are summarised in Section 4 and the comments received in Section 5 of this report.
- 1.23 The application constitutes a “major development” as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). The application is referable to the Mayor of London, as it exceeds the thresholds for categories 1A, 1B.1(c) and 1C.1(c) as set out in the Town and Country Planning (Mayor of London) Order 2008. Both the GLA and TfL have been involved in pre-application discussions. A summary of the GLA’s Stage 1 report received on 11 October 2024 is summarised in Paragraphs 5.27 – 5.32 of this report.
- 1.24 The application has been the subject of two statutory consultations. The initial statutory consultation period took place between 20 September 2024 and 25 November 2024. Amended plans were received by the Local Planning Authority in the summer of 2025. A second statutory consultation commenced on the 10 September 2025 until 13 October 2025. All the representations received up to the publication of the committee report have been considered. A summary of the comments received in response to the public consultation is included in Section 5 of this report.

- 1.25 The application has been referred to the Planning and Development Control Committee for determination, as the planning application is a major application, and subject to a s106 legal agreement. The recommendation of the Director of Planning to the Planning and Development Control Committee is that planning permission should be granted, subject to the conditions and completion of a satisfactory s106 legal agreement. The resolution of the Planning and Development Control Committee would be required to be referred to the Mayor for London, and the final decision notified to the Secretary of State.
- 1.26 The determination of the planning application submitted to the RBKC (ref: PP/24/05187) will be considered by the respective Planning Committee in the adjoining borough (date tbc).

2 SITE AND SURROUNDINGS

The Earls Court Development Site

- 2.1 The 'Earls Court Development Site' covers an area of approximately 18 hectares and forms part of the Earls Court & West Kensington Opportunity Area ('EC&WKOA') in the London Plan and the wider Fulham Regeneration Area in the LBHF Local Plan. The site straddles two London boroughs: Hammersmith and Fulham ('LBHF' or 'LBHF') and Royal Borough of Kensington and Chelsea ('RBKC'). The borough boundary runs through the middle of the Earls Court Development Site, on a broadly north-south axis. The administrative boundary is bisected (in part) by the Overground / West London Line ('WLL'). Part of the application site historically housed the former Earls Court Exhibition Centre which was demolished in 2015-2017.

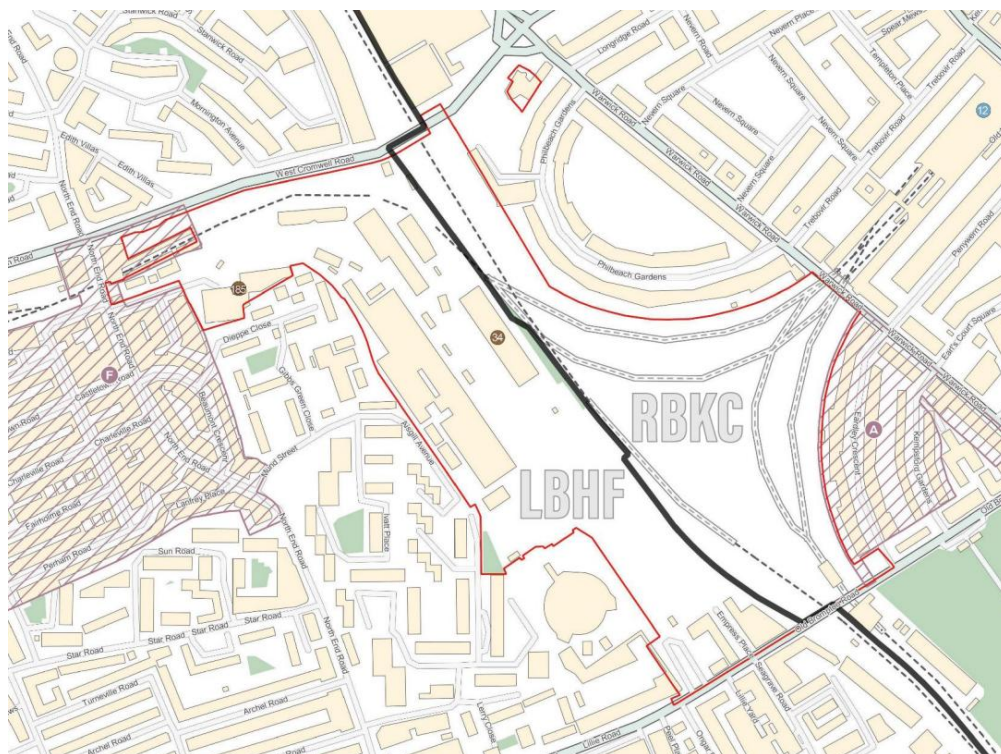


Figure 1: Administrative Boundary

- 2.2 The land within the redline boundaries for each application (and reference number included) is shown on the site location plan below. The LBHF application covers an area of approximately 10 hectares. The RBKC application is for approximately 8 hectares.

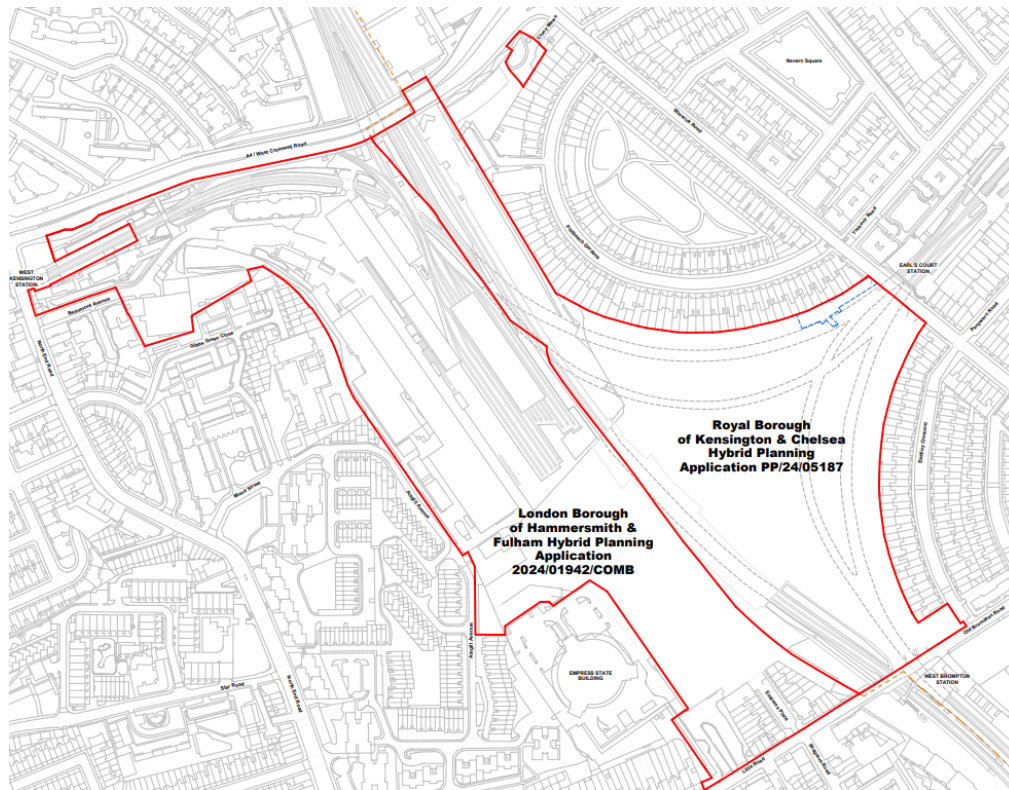


Figure 2: Site Plan

- 2.3 The Earls Court Development Site is bounded by West Cromwell Road (A4) to the north, Lillie Road to the south, residential properties on the West Kensington and Gibbs Green Estate and Beaumont Avenue to the west and the large Empress State (MOPAC) building to the south-west. In RBKC, the development site is enclosed by residential properties on Philbeach Gardens, Eardley Crescent and Warwick Road and to the south by Old Brompton Road. The land is largely a brownfield site, comprising railway infrastructure (above and below ground level) and a maintenance/training facility by London Underground Ltd (LUL) and Transport for London (TfL).
- 2.4 The aerial image below shows the extent of the Earls Court Development Site. The dotted line indicates the borough boundary between LBHF (West) and RBKC (East).



Figure 3: Aerial View of the Earls Court Development Site

The Application Site

2.5 The Development site in LBHF has an irregular shape due to the railway and underground infrastructure and covers an area of some 10.14 hectares (56% of the Earls Court site). The topography of the site is varied with an approximate 8m difference in site levels across the site. The general character of the site is split into the following land parcels:

- Part of the former Earls Court Exhibition Centre (land formerly occupied by the Earls Court 2 building 'EC2').
- Lillie Bridge Depot, including Ashfield House.
- Properties on Empress Place and 2-26 Lillie Road.
- The former 'Mannequin Factory' at 9 Beaumont Avenue.

2.6 The combined existing floorspace of buildings and structures on the site is approximately 37,172 sqm (GIA). The existing buildings includes Ashfield House (TfL – Depot land), Lillie Bridge Depot, and properties on Empress Place, Lillie Road, the corner of North End Road/Beaumont Avenue and 9 Beaumont Avenue.

Former Earls Court Exhibition Centre Land

2.7 Two former exhibition centre buildings ('EC1' and 'EC2') were demolished between 2015 and 2017, under the previous outline planning permission works. Most of the exhibition centre site was cleared, following the approval of the Demolition Waste Management Plan, pursuant to a condition under the 2013 outline permission. The two exhibition centre buildings were of a substantial size, in terms of their footprint, height, and massing. A raised concrete deck

('The Table') has been retained. The deck spans the Overground line and in effect connects the two boroughs at this point. The deck formerly created a servicing link between the two exhibition centre buildings. The structure is of a significant size and approximately 100m in length. The deck over the railway line would be repurposed as part of the Development.



Figure 4: Existing retained deck on the site

Lillie Bridge Depot

- 2.8 Lillie Bridge Depot (LBD) is approximately 4.85 hectares in size and covers approximately 27% of the site. The depot land is operated by London Underground Limited (LuL) and is owned by Transport for London (TfL). It includes train stabling facilities; a series of train sheds used as track and train maintenance / repair workshops and associated parking. Ashfield House is located at the northern end of the depot land. This 10-storey office building provides TfL staff training facilities and operational and emergency services.

Lille Road and Empress Place

- 2.9 There are existing low-rise properties located at the southern end of the site, on Lillie Road and Empress Place. They comprise 3/4 storey terraced buildings, containing commercial, retail, residential, office and affordable workspaces. They include the Prince Public House, on the corner of Lillie Road and Empress Place. The properties have been restored and brought back into use by the Applicant. Most are currently occupied and activated by temporary (meanwhile) uses.

TfL Bus Facility / Empress Approach

- 2.10 This is located on the south-west corner of the site, adjacent to the Empress State Building ('ESB') and Empress Place. This is a bus turning and waiting facility, accessed from Lillie Road. The open area comprises a bus layover with capacity for up to four buses and a small standalone welfare building for bus drivers.

9 Beaumont Avenue

- 2.11 A part two/part three storey building located in the northwestern part of the site, next to Lillie Bridge Depot and the Gibbs Green estate. The former industrial building is currently in use by an interactive theatre experience group and a church use, as a temporary (meanwhile) use.

Existing Infrastructure/Constraints

- 2.12 The District, Piccadilly and West London (Overground) lines all dissect the site. This results in no build / limited build zones, due to infrastructure asset protection requirements and structural limitations / loading restrictions. There are substantial level changes across the site, ranging up to 8m in LBHF. The concrete deck structure in the centre of the site is set at approximately 12m AOD (above ordnance datum). Levels either side of the deck drop towards the edges (east/west and north/south). East-west movement across the site is constrained by the West London Line. A green corridor runs through the middle of the site. The green corridor runs between the Westway and Lillie Road and continues southwards between Fulham Road and Chelsea Creek. This is a designated Grade II Site of Importance for Nature Conservation (SINC).

Meanwhile Uses

- 2.13 A mix of non-residential and residential meanwhile uses have been provided on site over the course of the last 4 years. The meanwhile use introduced to date have been positively received and have activated parts of the site whilst awaiting permission for redevelopment. Meanwhile uses currently operate on parts of the former exhibition centre land and include a temporary exhibition space, a community centre, leisure facilities and an employment training centre. The properties and shops in Empress Place and Lillie Road are in temporary use, as homes, affordable workspaces and retail units. An interactive theatre experience and church use operate out of former industrial premises at 9 Beaumont Avenue.

Surrounding Context

- 2.14 The surrounding area has a mix of commercial, residential and community uses. The local area is predominantly residential in character, yet includes offices, hotels, retail, and leisure uses, some of which are in larger buildings on Lillie Road and the A4. The architectural styles are varied. They include Victorian-era terraced homes, mansion style blocks and modern buildings, contained in a traditional network of streets. The West Kensington and Gibbs Green estates, located next to the western boundary of the site, comprise post-war housing, constructed in the 1960's and 1970's. The estate land comprises a variety of housing typologies, building forms, ranging in height from 2 to 11-storeys.
- 2.15 The Empress State building currently dominates the skyline. It lies adjacent to south-west boundary of the site. This early-1960's, 31 storey office building is substantial in size, scale and massing and is the tallest building in the immediate area. The building was briefly the tallest commercial building in London, until Millbank Tower was built in 1962. The building was originally designed as a hotel and was first used by the Admiralty and Government Communications Headquarters (GCHQ). Since 2020, the building has been

used by the Mayor's Office for Policing and Crime ('MOPAC'). A Certificate of Immunity (COI) was issued for the Empress State Building in 2019, which means the building was deemed not to be of special historic or architectural interest and therefore was protected from being listed for five years. This certificate expired on 14 October 2024, which means it will not prevent the building from being listed if it is deemed appropriate in the future.

- 2.16 The surrounding townscape to the west of North End Road and south of Lillie Road is predominantly of a lower scale, with typical Victorian terraced residential streets, aligned in either an east west or north south orientation, interspersed with contemporary apartment buildings. Lillie Square is a modern residential-led development, located to the south of Lillie Road (off Seagrave Road) for up to 800 units. The development includes residential blocks ranging between 3 and 6 to 16-storeys and is currently 50% completed.
- 2.17 In terms of the emerging surrounding context, 70-80 Lillie Road is an approved Council led residential redevelopment. The scheme will provide 42 residential homes and a replacement community hall, with heights of 4 to 5-storeys.

Site Designations and Heritage Assets

- 2.18 The application site forms part of the Earls Court & West Kensington Opportunity Area and is a key location for large-scale development in the London Plan. The Site lies within the wider Fulham Regeneration Area in the Local Plan and is designated as a key strategic site (in whole or in part).
- 2.19 The application site is located within the borough's Air Quality Management Area (AQMA). The AQMA extends across the entirety of the borough. The AQMA is designated for the air pollutants nitrogen dioxide (NO₂) and particulate matter (PM₁₀).
- 2.20 The site is almost entirely within Flood Zone 3, as identified by the Environment Agency.
- 2.21 Part of the site fall within a designated Site of Importance for Nature Conservation (SINC). No trees within the site are the subject of a Tree Preservation Order (TPO).
- 2.22 The site is located within the North End Ward and is situated approximately 0.5 kilometres from Fulham and Hammersmith Town Centres. The Earls Court Road District Town Centre (in RBKC) is to the east.

Heritage

- 2.23 Except for a small part located within the Barons Court Conservation Area (northwestern section), and part within the Philbeach Conservation Area (southeastern section in RBKC), most of the site is not in a conservation area. There is one listed building located in RBKC. This relates to an emergency exit structure, associated with the Grade II listed Earl's Court Station Underground Ticket Hall. The remainder of the structure lies beneath the ground level and does form part of the RBKC application site.

- 2.24 The Earls Court Site is surrounded by 17 conservation areas, several listed and locally listed buildings.
- 2.25 The closest conservation areas in LBHF are the Sedlescombe Road and Walham Green Conservation Areas (situated to the south), and the Olympia and Avonmore Conservation Area, Gunter Estate Conservation Area and the Fitzgeorge and Fitzjames Conservation Area to the north. To the west is the Barons Court Conservation Area, the Turnville / Chesson Conservation Area and Queen's Club Gardens Conservation Area. Nos. 62-68 Lille Road are Grade II listed. Empress State Building along with 19 Lillie Road (The Lillie Langtry P. H.) plus nos. 30 to 58 (even) and No. 171 & 173 (The Three Kings P. H.) West Kensington LUL Station and No. 253 (former Seven Stars P. H.) North End Road are on the Local Register of Buildings of Merit (BoM's).
- 2.26 The closest conservation area in RBKC is the Philbeach Conservation Area, which includes the Grade I listed St Cuthbert's Church and the Grade II listed Clergy House. East of Warwick Road there are several other conservation areas. They include the Nevern Square Conservation Area, Earls Court Square Conservation Area, the Boltons Conservation Area, Earls Court Village Conservation Area and Courtfield Conservation Area. To the north-east is the Edwardes Square / Scarsdale and Abington Conservation Area and Lexham Conservation Area.
- 2.27 To the south-east is Brompton Cemetery which is a large (16 hectares) publicly accessible and working cemetery. Brompton Cemetery is a Grade I listed Registered Park and Garden and a Conservation Area. The cemetery holds several listed buildings and monuments. This includes the Grade II* listed northern entrance gates on Old Brompton Road; the Grade II* listed Arcades; and the Grade II* listed Church of England Chapel. Brompton Cemetery is also a Grade 1 SINCE and is also designated Metropolitan Open Land. The Earls Court Station and West Brompton Station are Grade II listed.
- 2.28 A Certificate of Immunity from Listing was granted on 20 May 2022 for nos. 2-14 and 7-17 Empress Place, which lasts until 19 May 2027.
- 2.29 LBHF and Historic England identify several Archaeological Priority Areas (APA) in the borough, where there is a high potential for archaeological finds. These are generally located along the riverside and around the historic centres of Hammersmith, Fulham, and Walham Green. The Site is not located within an APA.
- 2.30 The London View Management Framework (LVMF) protected viewing corridor between Richmond Park and St Paul's Cathedral is beyond the boundary of the application site.

Accessibility

- 2.31 Existing access to the LBHF Site is via Empress Approach and Empress Place to the south, Aisgill Avenue to the west, Beaumont Avenue to the northwest and West Cromwell Road to the north.

Transport

- 2.32 The Site is strategically located on a busy highway network, serving central London and the M4 (west) and is easily accessible by public transport. The site's northern edge lies adjacent to West Cromwell Road (A4). The southern edge of the site lies adjacent to Lillie Road which runs east to west from West Brompton Station and Lillie Bridge to the A219 (Fulham Palace Road) in the west. Part of the western edge of the site lies adjacent to the North End Road, runs from north to south, from the A315 Hammersmith Road in the north to the A304 Fulham Road in the south. North End Road provides access to Beaumont Avenue and Beaumont Crescent, Mund Street / Aisgill Avenue and Thaxton Road which all serve the West Kensington or Gibbs Green estates.
- 2.33 The Public Transport Accessibility Level (PTAL) across the site varies due to the size and existing walking infrastructure. Parts of the site falls within PTAL 6a and 6b across the eastern and southern areas of the Site around Earl's Court Station and West Brompton Station. As a result, most parts of the site benefit from excellent public transport accessibility levels. Due to the lack of permeability, some parts of the site are less accessible and have a lower PTAL score of 2 and 3. This includes the western boundary of the site adjacent to the LBD and West Kensington and Gibbs Green estates. The PTAL score would improve if the proposed east/west pedestrian and cycle routes are delivered.
- 2.34 There are three London Underground stations close to the site. Earls Court Station lies in RBKC and opposite the eastern boundary of the site. The station lies within Zone 1 and is served by the Piccadilly and the District Line. West Brompton Station lies opposite the south-eastern boundary of the site. The station is in RBKC (and part in LBHF), lies within Zone 2 and is served by the London Overground and District Line. West Kensington Station is also in Zone 2 and is located adjacent to the northwestern boundary of the Site. This station is served by the District Line.
- 2.35 There are nine bus routes, and various bus stops around the perimeter of the site, connecting to various bus routes across London. There is a TfL bus layby facility on the northside of Lillie Road, next to the Empress State building. It includes bus stands and turn-around facilities mainly for the no.190 bus route.
- 2.36 There is a lack of pedestrian and cycle infrastructure through the centre of the site which prohibits connectivity and acts as a barrier to pedestrian and cycle routes. Edges of the site are however connected to a network of footways and cycle routes. At present, there is a Cycle Hire Docking Station located on Star Road off North End Road and on Lillie Road (west of North End Road), along with Halford Road (to the south) and Vereker Road (to the north).
- 2.37 There are several schools and places of worship within proximity to the site. Charing Cross Hospital is located to the west. Chelsea and Westminster Hospital (RBKC) is situated approximately 1km south of the Site, on Fulham Road.

3 PLANNING HISTORY

- 3.1 There is extensive planning history for the application site. The following have been identified as most relevant to this proposal.

Original Outline Permission

- 3.2 In 2013, the former owners of the site obtained Outline Planning Permission or 'OPP' from the two boroughs for a comprehensive residential-led, mixed-use redevelopment for land in LBHF and RBKC. This permission was for a 27-hectare development that covers most of the current application site. In LBHF, the 2013 permission included part of the former Earls Court Exhibition Centre land, the Lillie Bridge Depot land and the West Kensington and Gibbs Green estates. The outline permission was for a range of buildings and included three towers close to the Empress State Building at the southern of the site. Reserved matters approval relating to the former Earls Court Exhibition Centre land and the discharge of pre-commencement conditions permitted the demolition of the former exhibition centre buildings in 2015-17. Except for the demolition works permitted and carried out on part of the site, the development has not progressed. The site was subsequently sold, and the housing estate land was returned to LBHF.
- 3.3 On 14 November 2013, the LBHF OPP (ref. 2011/02001/OUT) was granted permission. This outline application was approved in conjunction with the RBKC – OPP (ref: PP/11/01937). Both outline permissions were subject to the same single S106 Agreement. A Non-Material Amendment application to the outline permission was granted on 14 June 2017 (ref: 2016/05481/NMAT). Revisions agreed related to amendments to the approved development parcel plan, including changes to boundaries, references and to the wording of conditions.
- 3.4 The red line boundary of the 2013 outline permission is different to the proposed development. The former application included land on the West Kensington and Gibbs Green estates but excluded the properties in Empress Place and 2-26 Lillie Road.
- 3.5 Both boroughs approved Reserved Matters Approval for the first phase of the 2013 development (referred to by the former developer as 'Earls Court Village'). This RMA essentially comprised land occupied by the former Earls Court Exhibition Centre buildings and related structures, most of which is in RBKC but also included land occupied by 'EC2' in LBHF. The first RMA in LBHF (ref. 2013/05200/RES) was approved by the Council on 10 April 2014. This was considered at broadly the same time as a reserved matters application for land in RBKC (ref. PP/13/07062) approved on 3 April 2014.
- 3.6 The 2013 OPP was the subject of 'prior to commencement' conditions, requiring the submission and approval of additional information before the relevant part or phase of the development could proceed. In respect of Phase 1 of the development ('EC Village'), condition 24 attached to the LBHF OPP requiring the submission and approval of a Demolition Waste Management Plan (DWMP1) was partially approved by the Council on 30 September 2014 (ref: 2014/03232/DET) with a further complete Demolition Waste Management Plan

(DWMP2) approved by the Council on 13 September 2016 (ref: 2016/02676/DET). Similar DWMP applications were approved by RBKC in respect of the same condition.

Meanwhile Uses

3.7 Temporary 'meanwhile' uses have been permitted in recent years, mostly on parts of the former exhibition centre (EC2) land, as a means of activating the site. This has included the following:

- A series of temporary planning permissions/advertisement consent on the former EC2 land for the 'Underbelly' use who operated winter and summer festivals between July 2021 and September 2022 (ref: 2022/00520/FUL and 2022/02061/NMAT).
- Latest temporary permission on part of the EC2 land (ref: 2025/00161/FUL and 2025/02107/NMAT) permits flexible community, leisure cultural and sporting uses, including a flexible pop-up food and beverage area and outdoor seating.
- 'Live entertainment' space (ref. 2022/02045/FUL and 2024/02746/FUL) involving the installation of a large temporary building on part of the EC2 land. Originally hosted the BBC Earth Experience. Now operating as the Greatest Showman Circus Spectacular experience until 2027.
- Continued use of shops/commercial premises 2-26 Lillie Road including temporary structures attached to the Prince Public House (On-going: Most recent applications: ref: 2023/02737/FUL and 2023/02739/FUL).
- Use of the former residential properties on the east side of Empress Place as the Empress Studios (ref: 2021/04027/FUL), providing start-up space for small businesses. Six vacant properties have been converted into affordable creative studios designed for the community.
- Use of residential properties on the west side of Empress Place and Seven Stars, North End Road back as homes, providing residential accommodation at discounted rents for key workers and people on low incomes. In partnership with LOWE Guardians.
- Creation of a Skills Centre (ref. 2022/03425/FUL) on part of the former EC2 land, for training and enterprise, working with community groups and future employers to upskill local people.
- Erection of 5 x padel courts, a club house/bar, and wellness facilities on part of the former 'Earls Court Exhibition Centre 2' site until 2027 (ref.2023/02631/FUL and 2024/02875/VAR).
- Creation of a Community Hub (ref. 2021/03095/FUL) on the former Blue Car Park, managed by Hammersmith Community Gardens Association and supported by a resident led gardening club, providing residents with classes and garden space and used by a local Scout group
- 9 Beaumont Avenue (ref. 2022/01426/FUL): Former mannequin factory now providing a temporary immersive theatre operator (The Lost Estate) and space used by a church group until 31 July 2027.
- Erection of a Stone Demonstrator (ref: 2025/00024/FUL) on part of the former EC2 site. A project from the Design Museum, for the purpose of educating construction industry specialists and the public about using stone in construction works.

Environmental Impact Assessment (EIA): Scoping Request/Opinion

- 3.8 A formal request for an EIA Scoping Opinion was submitted to the Council on 26 October 2023 (ref: 2023/02817/SCOEIA). The Council issued its Scoping Opinion on 13 December 2023.

“Mund Street” Application

- 3.9 On Gibbs Green, to the west of the Site, on land currently occupied on a temporary basis by Avonmore Primary School, a planning application (known as the ‘Mund Street Application’) has been submitted by LBHF to deliver 107 dwellings (Ref: 2025/02153/FR3). Subject to planning permission, construction is anticipated to commence in 2027, once Avonmore Primary School has relocated back to its original site. At the time of printing the report, this planning application is currently under consideration.

4 THE DEVELOPMENT PROPOSALS

- 4.1 The planning application is submitted in a hybrid form and consists of a part Detailed and part Outline submission. A similar hybrid planning application has been submitted to the Royal Borough of Kensington and Chelsea (RBKC). Combined, both hybrid applications would result in a comprehensive redevelopment of the Earls Court Development Site.
- 4.2 The report to committee covers the consideration of the LBHF hybrid planning application. The report will refer to the application (ref: PP/24/05187) submitted to RBKC.
- 4.3 Planning permission is sought for a mixed-use redevelopment of the LBHF application site, for a variety of land uses and building heights. This will include residential, offices, research and development, other commercial, cultural, leisure and community land uses. Building heights will vary and range between 3 up to 42-storeys. The development includes new access arrangements, infrastructure, public realm / public open spaces, and landscaping. Part of Phase 1 of the phased development is submitted as a fully detailed application, identifying the architectural design, internal layout and detailing proposed in this part of the first phase. The remainder of Phase 1 and all the other phases is the subject of the outline component of the application.

Description of Development

- 4.4 The description of the Proposed Development for the LBHF application is as follows:

“Hybrid planning application (part in detail and part in outline) for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed-use development above and below ground level and all associated and ancillary works and structures including temporary development, highway and infrastructure works and structures, comprising:

Outline proposals for up to 373,000sqm GEA of mixed use floorspace for residential use (Use Class C3) (up to 2,044 homes) and non-residential uses comprising hotel (Use Class C1), older persons housing (Use Class C2), office and/or research and development (Use Class E(g)), education (Use Class E(f)/F), retail, food and beverage and other commercial uses (Use Class E(a)/(b)/(c)), leisure facilities (Use Class E(d)), cultural facilities (Use Class F), storage and distribution (Use Class B8), community and social facilities (Use Class E(e)/(f)/F) and sui generis use (student accommodation and co-living, theatre, nightclub, car show room, drinking establishment (with or without expanded food provision), hot food takeaway, live music performance venue, cinema, concert hall, bingo hall and dance hall uses) together with ancillary floorspace.

Detailed proposals for four buildings (to comprise 92,973 sqm GEA), ranging between 13 and 42 storeys in height (up to +158m AOD) for a mix of uses including: residential use (Use Class C3) to provide 456 homes (Use Class C3), student accommodation, delivering up to 696 rooms and non-residential floorspace comprising: up to 3,235 sqm GEA of flexible retail, food & beverage, commercial and/or cultural floorspace (Use Classes E(a)/(b)/(c)/F/sui generis); 2,113 sqm GEA leisure floorspace (Use Classes E(d) / sui generis) and 422 sqm GEA of community floorspace (Use Classes E(e)/(f)/(g)/F together with ancillary floorspace”.

The description of the Proposed Development for the RBKC application is as follows:

“Hybrid planning application for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed-use development above and below ground level and all associated and ancillary works and structures including temporary development, highway and infrastructure works and structures, comprising:

Outline proposals for up to 204,000sqm GEA of floorspace for residential (Use Class C3) use (up to 1,090 homes) and non-residential uses comprising hotel (Use Class C1), older persons housing (Use Class C2), office and/or research and development (Use Class E(g)), education (Use Class E(f)/F1), retail, food and beverage and other commercial uses (Use Class E(a)/(b)/(c)), leisure facilities (Use Class E(d)), cultural facilities (Use Class F1), storage and distribution (Use Class B8), community and social facilities (Use Class E(e)/(f)/F2) and sui generis uses (student accommodation and co-living, theatre, car showroom, nightclub, drinking establishment (with or without expanded food provision), hot food takeaway, live music performance venue, cinema, concert hall, bingo hall and dance hall uses).

Detailed proposals for two buildings of up to 109m AOD and 79m AOD in height for residential use (up to 42,058sqm GEA to provide up to 310 homes) (Use Class C3), and non-residential uses comprising: up to 1,451sqm GEA of retail/food and beverage/commercial floorspace (Use Classes E(a)/(b)/(c)); and up to 361sqm GEA of community/social floorspace (Use Classes E(e)/(f)/F)”.

- 4.5 Detailed planning permission is sought for parts of Phase 1 in LBHF and RBKC. The outline application covers the rest of the proposed development. The outline phases are submitted with all matters reserved for future consideration (layout, scale, appearance, access and landscaping). There are three Development Zones: 'Zone B', 'Zone G' and 'Zone V' that span the borough boundary. These development zones will be considered jointly by both the LBHF and RBKC application. The proposal seeks approval for demolition works (either the partial retention or the complete demolition of existing buildings and ancillary structures) on the site. The final details would be determined by the submission of the Reserved Matters.

Amendments

- 4.6 The Proposed Development has been revised in response to the feedback received on the original (July 2024) planning application. The modifications and changes made to the Proposed Development are mostly minor. Several amendments concern points of clarification or adjustments to the original scheme. Most of the additional information submitted by the Applicant (dated July or August 2025) is designed to supplement the original July 2024 application submission. The information submitted has come forward in addendums, notes or revised plans. Full replacement versions of the Control Documents for the Outline component which are for approval (i.e. Development Specification, Parameter Plans and Design Code) have been submitted and replace the previous July 2024 versions.
- 4.7 The proposed amendments to the Control Documents are summarised as follows:

- **Updates to Parameter Plans**

Refinement of the maximum parameter envelope of Development Zone "X" in LBHF (in connection with Development Plot WK02). The maximum parameter envelope is now proposed to be set back to the north. A reduction to the maximum parameter envelope of Development Zone "F" in RBKC (in respect to Development Plot EC03), by one floor (3.5m), is proposed. Other proposed modifications relate to the access point details, annotations regarding ground floor active frontages, modifications to the planning application boundary between Plot WB05 and Empress State Building (to the south) and corrections to the parameter plans to provide clarity or ensure alignment with updates to the Development Specification and Design Code. A key amendment includes the removal of potential vehicular access points to Aisgill Avenue (via Mund Street) and the West Kensington estate. Except for the provision of emergency access, all other forms of vehicular access via the housing estate land have been removed.

- **Minor changes to the LBHF Detailed Component (Development Plots: WB03, WB04 and WB05)**

Amendments principally sought to address updates to Fire Safety Regulations, including the introduction of a secondary escape stairwell and resultant amendments to core arrangements. These requirements have led to a minor increase in the building footprint of WB05 and WB06,

amendments to internal layout configurations together with minor fenestration amendments, changes to the external communal residential amenity space layouts and a reconfiguration of cycle parking facilities (decrease in long-stay cycle spaces and an increase in short-stay cycle spaces). The amendments result in a small increase to the total GEA floorspace of the detailed plots. The effect of the inclusion of additional building core space within the buildings will lead to a reduction in the LBHF Detailed Residential Component by six units (462 to 456), along with changes in residential tenure and unit mix. Amendments have also been made to the RBKC Detailed Component (for Plots EC05 and EC06).

- **Additional and updated codes within the Design Code document**
Amended to align with updated Parameter Plans and the Development Specification.
- **Development Specification**
Updated to clarify details regarding land use flexibility and reflect the amendments below.
- **Housing Numbers**
The LBHF minimum residential unit number has increased from 1,600 to 2,000 homes.
- **Maximum office / research and development floorspace**
Reduced in LBHF by 20,000 sqm (GEA) from a maximum cap of 175,000 sqm to 155,000 sqm. Minimum cap of 50,000 sqm remains unchanged.

Development Works

4.8 The proposed development works are summarised under the following categories:

- Preparation, infrastructure and enabling works (prior to commencement). Defined as Advance Infrastructure Works or Preparatory Works in the report.
- Partial or full demolition works of existing on-site buildings and/or structures.
- Excavation, piling and substructure works.
- In total, 29 site-wide Development Zones are proposed. 14 Development Zones are proposed in LBHF (and 15 Development Zones in RBKC).
- Construction works begin with the Detailed Component in Phase 1 (LBHF: Development Zone 'H'). This will consist of three Development Plots: WB03, WB04 and WB05.
- A similar detailed component is proposed in RBKC for Development Zone 'L'. Consist of two Development Plots: EC05 and EC06.
- The site-wide Earls Court Development is divided into 27 Outline Development Zones. These zones are expected to come forward in phases, with all matters reserved for a future stage.
- 13 Outline Development Zones proposed in LBHF (Zones: B1, C, G1, I, N, P, T, U, V1, W, X, Y and Z). In RBKC, 14 Outline Development Zones are proposed.

- Three Development Zones span the borough boundary between LBHF and RBKC. These are denoted as Development Zones: 'B1 and B2', 'G1 and G2' and 'V1' and 'V2'.
- The provision of vehicle, pedestrian and cycle access routes.
- Drainage infrastructure, lighting, landscaping and associated development works are included.

The Detailed Components highlighted on the image below are as follows:

- Zone 'A' (in RBKC) and
- Zone 'B' (in LBHF).



Figure 5: Detailed and Outline Components (LBHF/RBKC)

- 4.9 Phase 1 (Detailed Component) covers three Development Plots in LBHF (WB03, WB04 and WB05) and two Development Plots in RBKC (EC05 and EC06). The remaining development plots in Phase 1, including WB06 in LBHF, are submitted in outline form.
- 4.10 The other phases will come forward in outline form. The Development Specification, Parameter Plans and Design Codes provide details of the maximum parameters for each development zone, and codes to manage their

future design and appearance. Alongside these details, the planning application is supported by an Illustrative Masterplan that is an example of how future phases could be delivered. It provides an illustration of the design quality of buildings, spaces, and places which could be developed in future phases. The application is also supported by a site wide Landscape Masterplan which gives illustrative details of key public spaces, routes, and connections which could be delivered by the development.

Site Arrangement

- 4.11 The Development Zone layout is managed by the Parameter Plans and is based on the existing site constraints including the level changes and land ownership. The Development Zones would align with the edges of the site and the key public spaces, routes, and connections proposed within the public realm. A central public park space 'Table Park', open spaces, routes, access points and the formation of three main entrance squares: 'Warwick Square' in the east, 'Brompton Square' in the south and 'Aisgill Gardens' in the west, are variously incorporated within the Development Zones. Each square proposes key connection links and routes to alternative access points: the Northern Access point, Empress Place (south-west) and Beaumont Avenue (north-west). The last two are in LBHF. Access via Beaumont Avenue will be dependent on latter phases of the development coming forward. The proposals include the possibility of a new Bio-Line being formed, by decking over the southern section of the existing railway cutting, subject to an agreement with Network Rail. This additional link would provide access off Old Brompton Road/Lillie Road at the existing Lillie Bridge.
- 4.12 Two key pedestrian/cycle routes are proposed. An 'east to west' route would connect both boroughs, via the Table Park, providing a pedestrian and cycle link between Aisgill Avenue in LBHF and Warwick Road (and Earl's Court Station) in RBKC. A 'north – south' connection is proposed linking West Brompton / Lillie Road (south) to West Kensington Station and Beaumont Avenue (north). A series of streets and boulevards are proposed within the site, designed around and through the Development Zones.

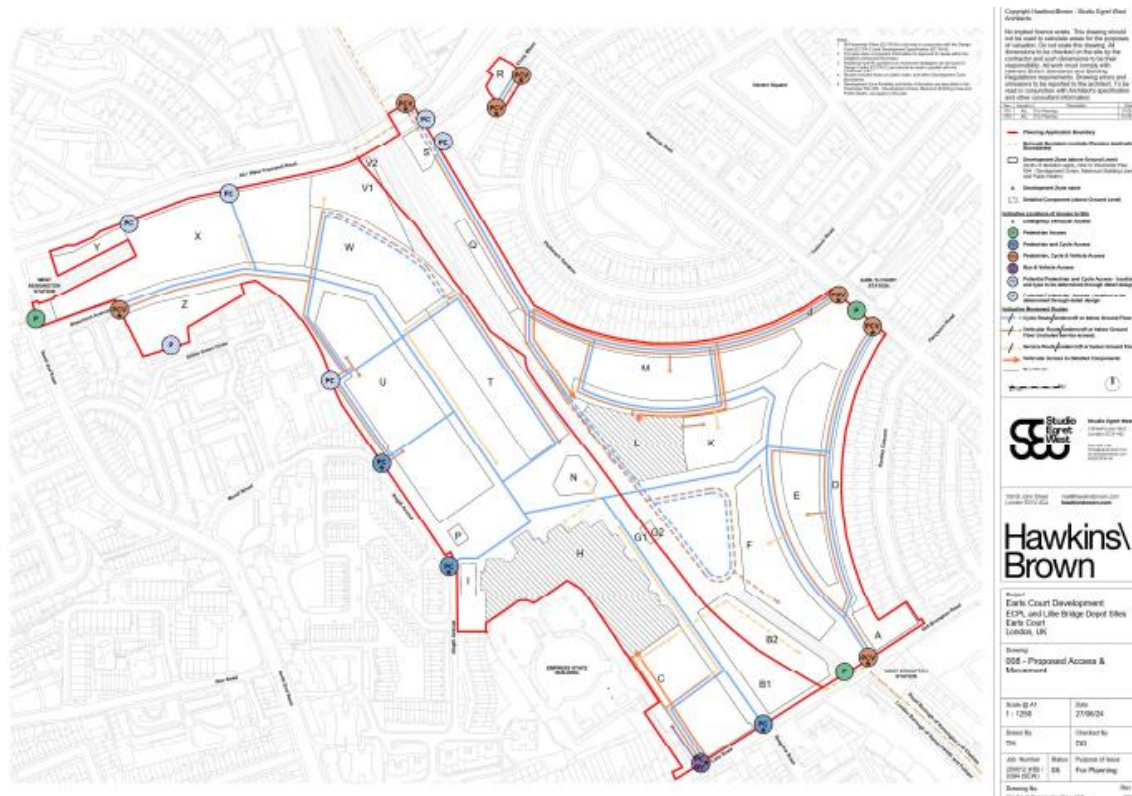


Figure 6: Parameter Plan 008 – Proposed Access and Movement

Site Levels

- 4.13 The development layout is designed with the existing challenging level changes across the site. This includes the repurposing of existing deck structure across the West London Line, to provide a significant public open space on the site and provide a key link from the borough to RBKC. The Site levels in RBKC would decrease gradually from the edges to the Table to the edges. The 'Table Park' would be fronted by detailed plots and the outline components of the development. On the LBHF side, the design and layout are more demanding to design and hampered by the 8m variation in levels across the site. A terraced water feature, 'The Cascades' is proposed to allow a gradual step down from the Table Park to 'Aisgill Gardens' to the west and 'Lillie Square' off Empress Place.

The Combined Floorspace (Detailed/Outline Components)

- 4.14 The two hybrid planning applications together seek planning permission for a combined maximum total floorspace (above and below ground level) of **712,031 sqm (GEA)**.

- 4.15 A breakdown of the total proposed floorspace in each borough, and in both the Detailed and Outline elements is provided in the table below.

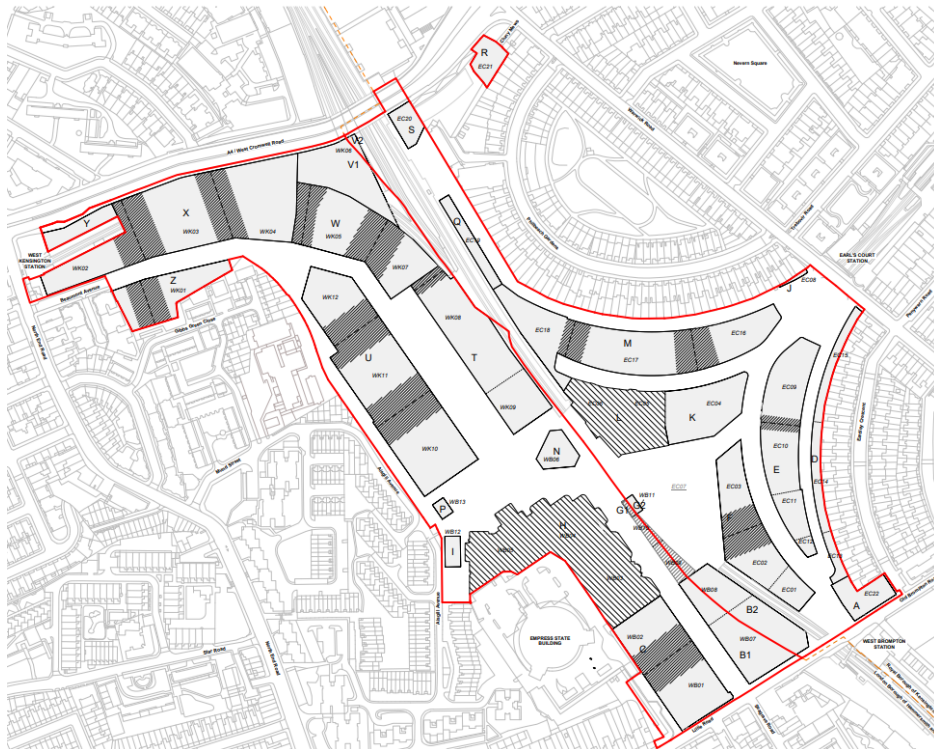
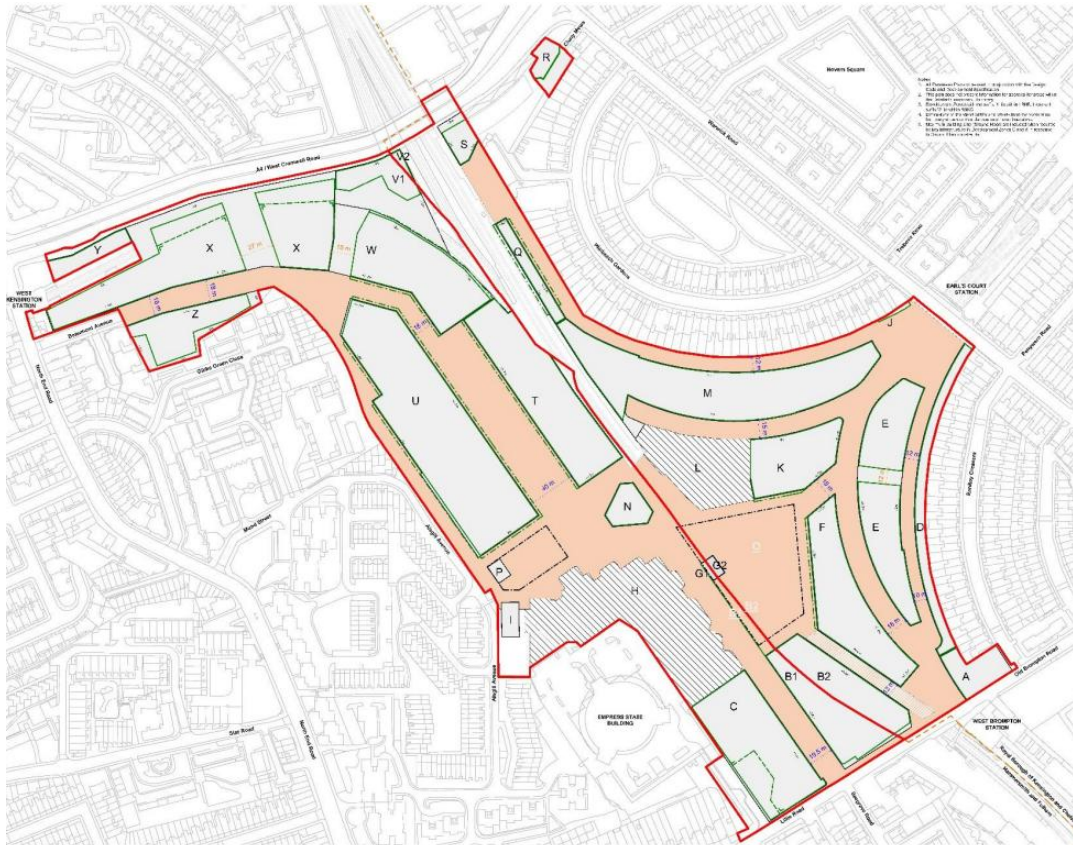
Application	Outline Component Area (sqm GEA)	Detailed Component Area (sqm GEA)	Overall Total (sqm GEA)
LBHF Application	373,000	92,973	465,973
RBKC Application	204,000	42,058	246,058
Overall Total	577,000	135,031	712,031

Floorspace (LBHF)

- 4.16 The maximum total floorspace provision permitted in LBHF would equate to **465,973 sqm (GEA)**. This has increased by 456 sqm. since the original submission. The Early Phases in LBHF (Phases 1 – 4) are capped at 198,773sqm (GEA) with the latter phases (Phases 5-8) delivering up to 267,200 sqm (GEA).

Development Zones

- 4.17 The Earls Court Development Site would deliver a comprehensive development layout. The masterplan is subdivided into Development Zones (15 in LBHF and 14 in RBKC) and smaller Development Plots.



- 4.18 Each Development Zone is subdivided into Development Plots which could include one or more buildings, together with private amenity space, public open space or other forms of landscaping, public realm and access routes. Five detailed Development Plots (3 in LBHF and 2 in RBKC) would come forward in Phase 1a. The two hatched areas (in the image above) identify the exact location of Development Zone 'H' (in LBHF) and Development Zone 'L' (in RBKC) and the related Development Plots contained within each zone.
- 4.19 For the Outline Component, the final footprint and layout of the proposed development plots contained in each Development Zone is controlled by a series of Parameter Plans which have been submitted with the application for approval. The parameter plans set out the development constraints within which the detailed development will come forward later. Development for the Outline Component on the site is controlled by the Development Specification, which builds upon the detail provided on the Parameter Plans, and by the Design Codes that seek to establish the key principles to ensure design quality. The Parameter Plans, Development Specification and Design Guidelines are for formal approval and will fix the land use, maximum quantum, maximum building heights, access and circulation routes, and areas of public realm for the outline part of this application. The final design of each outline development plot coming forward would be considered at the reserved matters stage.
- 4.20 Deviations are permitted within the Parameter Plans and Development Specification documents which will permit a level of flexibility; however, the control documents still provide a certain level of certainty on the overall layout, quantum of development and land uses coming forward. The ground floor footprint of all the proposed buildings will need to construct within the boundaries of the development zone, with controls on maximum and minimum horizontal deviations for the frontages of buildings and upper floors set out for each zone. Building height will also vary across the site and are set within maximum vertical deviations in the parameter plans. Storey heights would range between 3 up to 42 storeys (up to 158m AOD maximum height range), with the two tallest buildings located within the LBHF Detailed Component.
- 4.21 Each Development Zone in LBHF is capped up to a maximum total development floorspace quantum as shown in the table below. The proposed predominant and other land uses for each Development Zone is listed below.

Development Zones within LBHF		
Development Zone (LBHF)	Summary of Development Zone	Maximum Floor Space GEA (sqm)
EARLY PHASES		
B1	Zone B split among the two boroughs (B1: LBHF and B2: RBKC). Zone comprises four plots: (WB07, part; WB08, part; WB09, part, WB10, part)	30,000 <i>N.B. (B2: RBKC = 27,000 sqm)</i>

	Predominant Use: <u>Commercial Use:</u> Offices/Research & Development. Other uses comprise flexible retail /F&B / commercial/culture and/or leisure uses. Use on lower floors comprise commercial use (WB07) and cultural use (WB08).	
C	Zone comprises two plots: WB01 and WB02 Predominant Use: Commercial Use: Offices/Research & Development. Other uses comprise retail /F&B /flexible commercial and/or leisure uses. Alternative uses include residential and/or co-living and/or older persons housing and/or hotel and/or education. Uses on lower floors comprise commercial uses with flexibility for residential (WB02).	48,000
G1	Zone linked to the Table Park and split among the two boroughs Development Zone WB11 (in part) (G1: LBHF and G2: RBKC). 500 sqm in total. Comprise retail /F&B /flexible commercial and/or culture and leisure uses.	200 <i>N.B. (G2: RBKC = 300 sqm)</i>
H	DETAILED PLOTS: WB03 / WB04 and WB05	92,973
I	Development Zone WB12 Free-standing Community use building adjacent to WB05.	300
N	Zone comprises one development plot: WB06 Predominant Use: Residential. Other uses comprise retail /F&B /flexible commercial and/or cultural or leisure use.	27,300
P	Development Zone WB13: Small freestanding plot located within Aisgill Gardens. Predominant Use: Retail /F&B /flexible commercial and/or cultural or leisure use.	500

ALL PHASES		
T	Zone comprises two development plots: WK08 and WK09 Predominant Use: Residential or student accommodation and/or co-living and/or older persons housing. Other uses comprise retail /F&B /flexible commercial and/or leisure uses. Uses on lower floors comprise cultural or sui generis uses.	45,000
U	Zone comprises three development plots: WK10, WK11 and WK12 Predominant Use: Residential. Other uses comprise retail /F&B /flexible commercial and/or leisure uses including office and Research and Development or community / Social Infrastructure uses.	68,000
V1	Zone split among the two boroughs (V1: LBHF and V2: RBKC). Zone comprises one development plot: WK06 Predominant Use: Residential and/or student accommodation and/or co-living and/or older persons housing. Other uses storage and distribution/data centre.	10,000 <i>N.B. (V2: RBKC = 2,000 sqm)</i>
W	Zone comprises two development plots: WK05 and WK07 Predominant Use: Residential and/or co-living, or health and/or older persons housing. Alternatively commercial uses including Offices/Research & Development and/or Education. Other uses comprise residential and/or commercial uses (WK07). Uses on lower floors comprise health or educational uses.	42,000
X	Zone comprises three development plots: WK02, WK03 and WK04	86,000

	Predominant Use: Commercial led: Offices/Research & Development and/or Residential. Other uses comprise retail /F&B /flexible commercial and/or leisure uses alongside Offices/Research & Development or Residential. Uses on lower floors comprise commercial uses with flexibility for a data centre and residential (WB03).	
Y	Development Zone WK13 comprising Ancillary Plant - Predominantly sui generis, cultural or ancillary uses.	3,000
Z	Predominant Use: Residential. Other uses comprise retail /F&B /flexible commercial and/or cultural uses	10,000
Total		465,973

- 4.22 Each Outline Development Zone listed above permits a variety of land uses that could be delivered within a zone up to the maximum floorspace cap. The floorspace and land uses proposed for the outline component are regulated by the controlled documents and will be presented in full detail at the reserved matters stage. The proposed development envisages a level of flexibility for each area at ground or upper floor levels, between the 'predominant' and 'other' land uses listed for each zone. This will respond to demand during the construction program at each phase. At the base of most of the buildings, a wide range of active frontages and uses are proposed. The final land uses expected to come forward within each development zone would also be controlled by the maximum floorspace provision permitted for each land use (see table below).

Land Uses

- 4.23 A breakdown of the maximum floorspace provision proposed for each land use (Detailed and/or Outline Component) is listed in the table below.

Land Use	Detailed Area Floorspace (GEA) (sqm) / per use	TOTAL Maximum Permitted Area Floorspace (GEA) (sqm) / per use
Residential	55,143	290,000
PBSA	30,635	68,000
Co-Living	0	48,000
Hotel	0	20,000
Offices / Research & Development	0	155,000
Education	0	25,000
Health / Older Persons Housing	0	40,000
Retail / F + B / Flexible Commercial	3,235	14,000
Leisure	2,113	9,000
Culture	0	7,000
Storage & Distribution	0	10,000
Community / Social Infrastructure	422	1,500
Ancillary (Station Interface / Parking / General BoH)	1,425	30,000
Maximum Development Capacity	92,973	717,500

Flexibility Plots and Land Uses

- 4.24 To enable the Development to respond to the changing market conditions, reduce the need to apply for repeated amendments to an original outline permission and ensure successful delivery at each phase, varying degrees of flexibility are proposed for most of the development zones (or plots). This is an established practice for large multi phased developments of this nature that will be built out over a prolonged period. It is expected that the Development will encounter market fluctuations, full economic cycles and demand pressures during the 20-year build programme. Some Development Zones are identified as 'Flexible Zones' (Zones 'C', 'T' and 'V' in LBHF) which means different predominant land uses (e.g. residential or commercial uses) might come forward within a plot building at the RMA stage. Development Plots WB01, WB02, WK03 & WK04 are identified where commercial led buildings but could instead come forward for residential uses.
- 4.25 In contrast to the detailed floorspace breakdown, the Outline Component would vary and would be dependent on the final land use(s) that come forward for each phase of the development. The proposed quantum listed above exclude the public realm and landscaping proposed to be delivered. Adding up all the maximum permitted areas across all permitted uses comes to 717,500 sqm which is significantly greater than the maximum permitted floorspace cap sought of 465,973 sqm. Similarly, the maximum cap listed for each land use cannot be surpassed across the site. This level of flexibility on how the different

land uses proposed could come forward, will be dependent on the Reserved Matters Approval process to determine the final quantum and land use mix that comes forward through the different phases.

- 4.26 Officers accept there needs to be a level of flexibility for a development of this scale and the reasons outlined above. This however needs to be balanced with the necessity for the Council to retain a level of control over the mix of uses as the development progresses. The delivery of floorspace and mix of land uses that come forward for each Development Zone will be controlled by the Control Documents, conditions and S106 obligations. The applicant proposes the use of 'Reconciliation Statements' which will track the amount of floorspace, the use (including number and type of residential units), and the public realm and landscaping provision as each Reserved Matters Application is progressed and thereby demonstrate compliance with the Control Documents. A template version has been submitted for information with the application.
- 4.27 The table below (contained in the Development Specification Document), summarises the proposed maximum floor area (GEA) for the LBHF application in respect of each Development Zone and proposed land uses.

Table 6a: LBHF Hybrid Application Floorspace and Land Use Table

Land use		Development Zone														Maximum Permitted Area (sqm GEA)
Land Use	Use Class	B	C	G	H	I	N	P	T	U	V	W	X	Y	Z	
		1		1							1					
		LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	
Residential	C3	0	22,000	0	55,143	0	26,000	0	42,000	64,000	10,000	40,000	80,000	0	10,000	290,000
PBSA	Sui Generis	0	0	0	30,636	0	0	0	39,000	0	9,000	0	0	0	0	68,000
Co-living	Sui Generis	0	20,000	0	0	0	0	0	39,000	0	9,000	16,000	0	0	0	48,000
Hotel	C1	0	20,000	0	0	0	0	0	0	0	0	0	0	0	0	20,000
Office /Research & Development	E(g)	25,000	45,000	0	0	0	0	0	3,000	1,000	0	24,000	80,000	0	0	155,000
Education	E (f) / F1(a)	0	20,000	0	0	0	0	0	0	0	0	22,000	0	0	0	25,000
Health / Older Persons Housing	C2	0	20,000	0	0	0	0	0	39,000	0	9,000	38,000	0	0	0	40,000
Retail / F+B / Flexible Commercial	E(a)(b)(c) / Sui Generis	4,000	4,000	100	3,235*	0	2,000	200	5,000	4,000	0	2,000	5,000	0	1,000	14,000
Leisure	E(d) / Sui Generis	2,000	0	0	2,113*	0	2,000	200	3,000	4,000	0	2,000	2,000	0	0	9,000
Culture	F / Sui Generis	3,000	2,000	100	0	0	3,000	200	3,000	4,000	0	2,000	2,000	0	1,000	7,000
Storage and Distribution	B8	0	0	0	0	0	0	0	0	0	5,000	0	5,000	0	0	10,000
Community / Social Infrastructure	F / E(e)(f)(g)	0	0	0	422	300	0	0	0	1,500	0	0	0	0	0	1,500
Ancillary (Station Interface / Parking / General BoH)	various	2,000	3,500	50	1,425	500	2,000	200	3,500	5,000	1,000	4,000	7,000	3,000	1,000	30,000
DZ max cap (sqm)		30,000	48,000	200	92,973	300	27,300	500	45,000	68,000	10,000	42,000	86,000	3,000	10,000	N/A
Maximum Permitted Area (sqm GEA)																465,973

Figure 9: Extract from the Development Specification Document

Class C3 Residential Uses

- 4.28 The proposed development seeks to provide new homes in the borough. Residential homes would comprise the largest proportion of floorspace within the Development and contain a mix of self-contained residential apartments (Use Class C3), distributed within a range of unit types and tenure. The residential uses extend across both boroughs and the detailed and outline components. Proposed new homes include the provision a small element of self-contained housing for older people (with an element of care provision) which could come forward, falling within the Class C2 definition.
- 4.29 Up to 3,900 residential units (Class C3) are proposed across the two boroughs, with up to 2,500 homes in LBHF and 1,400 homes in RBKC. The proposal includes a minimum number of new homes in LBHF, set at 2,000 homes. The housing provision in LBHF would be split between 456 homes (detailed plots) in Phase 1a and up to 2,044 homes across the outline plots. The new homes

would come forward across the different phases with up to 1,056 within the Early Phases and up to 1,444 in the Later Phases. The final unit numbers will be dependent on the precise mix and unit sizes and the controls within the parameter plans. A total 35% affordable housing is proposed across the development, and this will be calculated by habitable room.

Other forms of Living Accommodation

- 4.30 In addition to Class C3 residential units, the proposed development includes a combination of alternative forms of living accommodation. 'Purpose-built Student Accommodation' comprising self-contained units or bedrooms with shared facilities, for occupation by students in higher education is proposed. Co-Living floorspace and units are included. Co-Living is defined as non-self-contained housing units with shared facilities. In contrast to student accommodation, Co-Living is a form of living accommodation not restricted to occupation by specified groups, such as students or older people. Both student accommodation and Co-Living are defined as 'Sui Generis' uses in the Use Class Order. The Older Person Housing units (Class C2) and Hotel rooms (Class C1) are included in the land use mix and add to the different forms of living accommodation proposed in the development.
- 4.31 The table below provides a detailed breakdown of the maximum quantum of residential accommodation proposed in both boroughs. The outline component is based on the parameters/maximum floorspace caps. The overall mix has been revised. In LBHF there is no change to the overall total number of residential units. Alterations have been received to the detailed component (a reduction in the number of homes from 462 to 456) and outline component (increase to a maximum threshold from 2,038 to 2,044).

Maximum Residential Accommodation Provision					
Land Use	LBHF Detailed Component	LBHF Outline Component	LBHF Total Component	RBKC Total Component (Detailed / Outline Components)	Overall Total
Residential Units <i>Class C3</i>	456	2,044	2,500	1,400 (310 / 1090)	3,900
Hotel Rooms <i>Class C1</i>	0	250	250	200 (0 / 200)	450
Older Persons Housing <i>Class C2</i>	0	150	150	150 (0 / 150)	300
Co Living <i>Sui Generis</i>	0	960	960	40 (0 / 40)	1,000
Student Accommodation <i>Sui Generis</i>	696	804	1,500	30 (0 / 30)	1,500

Commercial Uses

- 4.32 The non-residential uses would be spread across all the Plots in the application site and include a large amount of commercial floorspace. The Applicant states that their aim is to create a world-leading science, technology, and innovation quarter. 'Flexible Commercial' spaces are proposed for a range of types of retail, food and beverage beside the commercial uses, that fall within Use Classes E(a)/(b)/(c) such as offices or research and development spaces.
- 4.33 The Development seeks to provide three key workspace hubs across the Earls Court Site, capped at 155,000 sqm GEA; located close to the existing underground stations. Two of the hubs are proposed in LBHF and would offer business opportunities for start-ups, scale-ups and multinationals. Floorspace would include co-working and affordable workspace. The Retail and F&B uses are proposed on the ground floor of the buildings.
- 4.34 Other related land uses proposed to come forward would include 'Culture' type uses that fall within Use Classes F and/or a Sui Generis use. 'Leisure' type uses are also identified and relate to a range of leisure activities that may fall within Use Class E(d), or other leisure-related uses, such as those linked to retail or cultural activities, and in effect could come forward as part or incidental to another use. Temporary or permanent small-scale uses could also occur, particularly within the proposed public realm. Unless included in the outline component as a development plot, these would be subject to separate planning applications in future.
- 4.35 The proposed retail, cultural and leisure spaces are spread across the site, mostly within the base of buildings and are intended to serve the needs of those living and working on or adjoining the site and those visiting, linked to trips to the open spaces and venues.

Other Land Uses

- 4.36 'Community / Social Infrastructure' related uses that fall within Use Classes E (e) / (f) / (g) and/or F, or other education-related community / social infrastructure uses and educational uses that may fall within Use Class F1 (a), may also come forward as part of the Proposed Development. Health related uses, Storage and Distribution (Use Class B8) comprising warehouse, storage, logistics and data centre uses are also referenced as part of the other potential uses.
- 4.37 'Sui Generis' type uses are included. In addition to the Purpose-Built Student Accommodation (PBSA) and Co-Living uses referred to above, there are various other types of land use that would be defined as a sui generis use. These are any of the following: Bus Parking Facility, Theatre, Car Showroom, Nightclub, Drinking Establishment (with or without expanded food provision), Hot Food Takeaway, Live Music Performance Venue, Cinema, Concert Hall, Bingo Hall and Dance Hall use.
- 4.38 'Ancillary' type floorspace is included in the overall quantum of floorspace. This relates to the space between the stations, plant (including substations), parking, and below ground or general back of house areas.

- 4.39 The precise mix, nature, quantum or location of these uses referred to is not fixed at this stage. The application is assessed against a maximum floorspace allowance that allows for the different land uses to come forward as part of any detailed or RMA applications within a maximum cap. At this stage the proposed uses will be assessed in relation to their cumulative impacts and benefits prior to RMA approval being granted.

DETAILED COMPONENT

- 4.40 Detailed permission is sought for three Development Plots within Phase 1 of the Development.
- 4.41 Development Zone 'H' is a large, L-shaped zone, and is also referred to as the 'Empress State' cluster, in view of its proximity to the Empress State/MOPAC building. Development Plots (WB03, WB04 and WB05) are arranged as four buildings with a podium serving WB03/WB04.
- 4.42 The LBHF detailed plots are in the centre of the site. Located adjacent to the western boundary with the MOPAC building, opposite the 'Table Park' and 'Aisgill Gardens'. Development Plots WB03 and WB04 forward-face the 'Empress Place Boulevard', an extension off Empress Place, and 'Table Park' to the east which is opposite Development Plot WB06 (outline component), the 'Cascades' and 'Aisgill Gardens' to the north. Development Plot WB05 comprises two buildings ('T1' and 'T2'), located opposite 'Aisgill Gardens' to the north and Aisgill Avenue to the west. The development zone also includes a future replacement multi use games area (MUGA), currently on LBHF Housing estate land and community hall (Development Zone 'I' - Outline Component). See layout below.



Figure 10: WB03, WB04 and WB05 Location

- 4.43 The detailed plots would deliver 456 new homes (including 47 M4(3) accessible homes), across a range of tenures, together with 696 student rooms.
- 4.44 The RBKC detailed component is made up of two Development Plots (EC05 and EC06) in Development Zone 'L'. These plots are proposed to come forward in Phase 1, in the form of two tall buildings providing residential units with associated car and cycle parking, a ground-floor nursery and a food and beverage (F&B) unit.
- 4.45 The detailed plots would be entwined by new areas of public realm designed within Phase 1 of the development, including the Table Park. Final details of the public realm spaces outside the detailed plots will come forward in the first Reserved Matters Application.

Development Plots: WB03 / WB04 and WB05

- 4.46 The detailed component comprises the following key land uses:
- **WB03:** Purpose-built Student Accommodation (PBSA) – (Sui Generis)
 - **WB04:** Residential (Class C3)
 - **WB05 (T1 & T2):** Residential (Class C3)
- 4.47 The development plots include ancillary uses comprising of retail, food and beverage, flexible commercial and/or community (Class E (a), (b), (c), F and

sui generis) and leisure space (Class E (d)). WB03, WB04 and WB05 include 5,231 sqm GIA non-residential floorspace, comprising 2,918 sqm GIA of flexible retail, F&B, commercial spaces, 380 sqm GIA community space, 1,933 sqm GIA leisure floorspace and 1,356 sqm GIA of ancillary space.

- 4.48 A detailed breakdown of the proposed non-residential land uses for the detailed element in Phase 1 (by plot/GIA) is provided in the table below:

Land Use	Plot WB03 SQM GIA	Plot WB04 SQM GIA	Plot WB05 SQM GIA	TOTAL SQM GIA
Retail / Food & Beverage / Commercial	646sqm	1,863	409	2,918
Leisure	0	1,933	0	1,933
Community	0	0	380	380
Ancillary	144	1,123	88	1,356

- 4.49 The total floorspace proposed by land use (GIA sqm) for the detailed component is set out in the table below:

Detailed Component		
Land Use	Amount sqm GEA	Amount sqm GIA
Residential (C3)	55,143	49,927
Student Accommodation	30,635	28,042
Leisure	2,113	1,933
Retail / F&B / Flexible Commercial	3,235	1,827
Community /Social	422	380
Culture		1,091
Ancillary	1,425	1,356
TOTAL	92,973	84,566

- 4.50 Development Plots WB03 and WB04 are connected by a shared podium. The podium would contain ancillary service, car parking and access functions at the rear, with retail frontages on Empress Place. In comparison, Development Plot WB05 comprises two tall residential buildings to ground, facing Aisgill Gardens, with landscaping set around both buildings, including a private central courtyard.
- 4.51 The following two tables summarises the residential nos. and unit mix proposed within WB04 and WB05.

Detailed Component (HOMES)	
Development Plot	Number of Homes (units)
WB04	278
WB05-1	114
WB05-2	64
Total	456

Detailed Component (UNIT MIX)	
Home Type	Number of Homes (units)
Studio	28
1 bed	171
2 bed	169
3 bed	88
Total	456

4.52 No changes are proposed to Plot WB03 which remains the same or WB04 in terms of the mix or quantum of homes. An altered unit mix is proposed within Plot WB05.

4.53 In summary, the amendments to the detailed plots include:

- Improvements to public realm accessibility. Public lift within WB04 has been relocated to the prominent corner of the Cascading Pavilions, facing Aisgill Gardens. Expressed as a two-storey glass box.
- The gate to the Service Access Road has been moved north, to reduce the recess in front of the vehicle access gate.
- Adjustment of lift lobbies, escape stairs, and final exits in WB04. Provision of additional fire escape route.
- Residential layouts in WB05 redesigned to offer separate kitchen/dining and living spaces.
- Updated unit mix in WB05 reducing provision of 1-bedroom homes and increasing provision of 3-bedroom homes.
- Access arrangements to each cycle stores have been refined, in-line with Highways requirements.
- The waste collection strategy for WB05-T2 is proposed from the Service Access Road, instead of Aisgill Avenue.

4.54 The relevant Development Plots would consist of the following:

Development Plot WB03

4.55 A 33-storey building, equivalent in height to the existing neighbouring Empress State / MOPAC building. Maximum height of +112.6m AOD. The proposed building would consist of purpose-built student accommodation (PBSA), with ancillary commercial and amenity uses. A residential lobby and commercial

uses (retail or food and beverage uses) would be located within the podium space at ground level and face onto the 'Empress Boulevard' with 31 levels of accommodation above. The ground floor would include cycle storage and plant space. The student entrance would comprise of a double height lobby and be connected to the first floor PBSA amenities space consisting of a lounge area with seating, open plan study areas, gym and studio, and a games room.

- 4.56 A total of 696 student rooms is proposed on the upper floors above the podium level. 35% of the student rooms are designed as affordable units and 10% would be wheelchair accessible units.
- 4.57 The accommodation would comprise a mix of studios and standard rooms, with associated amenity spaces, split between 359 standard rooms and 337 studios. All the units have an ensuite bathroom. The larger studios include cooking facilities. Occupants in the standard rooms would have access to shared cooking facilities situated on the same floor level. A typical floor would contain 24 units and a mix of 10 studios and 14 standard bedrooms. Two communal roof terraces are proposed on the 31st floor. Each floor would be served by two stairways and four lifts. The main entrance is gained via Empress Boulevard. A delivery lobby space is proposed off the rear (west elevation) for vehicular deliveries. Bin storage would be located at lower ground level. Refuse facilities would be accessible to residents and refuse collection vehicles would use a new service access road off Lillie Road.
- 4.58 The amendments to WB03 include: Lift lobbies and escape stairs updated to meet fire safety standards BS 9991:2024; student community amenities more accessible from the Ground Floor lobby to Level 1: access corridor widened to 2m; doors on hold open to limit obstruction; core wall finishing treatment extended to lift lobby entrance; cycle store layouts, cycle amenities and accessibility amended: entrance door widened to 2m; cycle lift provided to access mezzanine cycle store level; and cycle maintenance point and lockers provided.
- 4.59 Additional information relating to the acceptability of the student accommodation use is considered in Section 10 of the committee report. Architectural character, appearance and materials of WB03 are considered in Section 15: Design and Heritage below.

Development Plot WB04

- 4.60 WB04 is the tallest proposed building within the Earls Court Site, at a height of 42 storeys (maximum height of +158m AOD). The proposed building would be the focal point for the tall building cluster which includes the existing MOPAC building.
- 4.61 WB04 is a residential-led building, with commercial (retail or food and beverage units) and a leisure facility on the lower floors. Ancillary uses would be set in the extended podium that covers three levels (lower ground, ground and first floor) and includes the main residential entrance lobby, plant, storage, service, refuse store, and the commercial and leisure uses, together with an amenity terrace, lounge, workspace, and a bookable dining space.

- 4.62 The main entrance is off Empress Boulevard. A communal terrace area is proposed on part of the podium roof (Level 02). Levels 39/40 would include two double height amenity spaces, with a viewing gallery accessible to residents of the building as well as amenity terrace, lounge, bookable dining space and associated kitchen. Plant space would be provided on Level 41.
- 4.63 Plot WB04 would provide 278 apartments, comprising a mix of studio, 1, 2 and 3 bed units and associated amenity space. 28 (10%) of all the homes would be M4(3) wheelchair adaptable. The residential apartments would surround a central core with two stairways and four lifts. All the apartments are designed to be dual aspect with private space in the form of balconies.
- 4.64 The amendments to WB04 comprise: Lift lobbies and escape stairs updated to meet the BS 9991:2024 including revisions to the podium roof access; and minor revisions to the apartment internal layouts, cycle storage facilities and amenities.
- 4.65 Additional information relating to the architectural character, appearance and materials of WB04 are considered in Section 15: Design and Heritage below.

Development Plot WB05

- 4.66 Plot WB05 comprises two tall residential buildings ('WB05-T1' and 'WB05-T2'), sited at grade level, with the proposed Aisgill Gardens to the north. The height and scale of these two buildings are designed to reflect a 'step down' and transition in height between the two tallest building plots (WB03 and WB04) and the surrounding lower scale properties located to the west on the West Kensington estate.
- 4.67 WB05-T1 is 17 storeys + roof level plant enclosure above (maximum height of +62m AOD). T2 is 9 storeys + roof level plant enclosure (maximum height of 38.8m AOD).
- 4.68 A private residential courtyard is proposed in the centre of the plot, shared between the two buildings. The WB05-T1 building would include space for a small retail or F&B use. Flexible Class E space and a standalone community centre building (Development Zone 'I') is proposed. Each building would include a main entrance lobby, and ancillary entrances serving cycle and bin stores and plant space. Disabled persons parking provision would be located to the rear (south), accessible via a new access road off Lillie Road (also serving WB03 and WB04).
- 4.69 Plot WB05 would provide 178 apartments and associated amenity space, with 19 (above 10%) of all homes M4(3) wheelchair accessible/adaptable. In comparison with the initial proposal a reduction of 6 homes is proposed following changes to the internal layout. The residential apartments would be located on the upper floors and comprise a mix of 1, 2 and 3-bedroom flats. All the units would be dual aspect and private amenity space that include a mix of balconies and roof terraces. Three of the units at Level 14 on T1 have private amenity space in the form of roof terraces. A community facility and commercial

floorspace are proposed at the base of the buildings. The community facility would be a flexible space and provide a community café, education and other spaces available for use by the wider community. A fully accessible public toilet with changing space for persons with a range of disabilities will be provided.

- 4.70 Additional information relating to the architectural character, appearance and materials of WB05 are considered in Section 15: Design and Heritage below.
- 4.71 An image of each detailed Proposed Development Plot is attached below:

WB03



WB04



WB05



- 4.72 The amendments to WB04 comprise: Public realm accessibility has been improved by relocating the public access lift within WB04. The public lift is now positioned on the prominent corner of the cascading pavilions, facing Aisgill Gardens. The lift is expressed as a two-storey glass box. Similarly, the gate to the Service Access Road between WB04 and WB05 has been moved north, to reduce the recess in front of the vehicle access gate.

Detailed Component: RBKC

- 4.73 The RBKC detailed component comprises the following two development plots:

Development Plot EC05

A 27-storey building and a 7-storey mansion block alongside two 3-storey townhouses with private entrances fronting Warwick Crescent. This plot would provide 202 homes and commercial units facing Table Park (currently proposed as food and beverage units). Homes would range in size from studios to three bedrooms.

Development Plot EC06

A single 20-storey building with commercial units located on Warwick Crescent. This plot would provide 108 homes, ranging from one to three bedrooms. A 340 sqm. nursery is also proposed within the ground floor of EC06.

- 4.74 Landscaping proposals for the RBKC detailed component include the public realm areas between EC05 and EC06, the residents' courtyard for EC05, and the two residents' roof terraces for EC06.

OUTLINE COMPONENT

- 4.75 Outline planning permission is sought for a large element of the site. It is intended that the outline component would be delivered following the commencement of the detailed plots summarised above. In summary, an outline planning permission means that the composition and detailed design of the Development Zones/or Plots is not yet fixed. Outline planning permission secures the principles of development and is granted subject to conditions requiring the subsequent approval of one or more 'Reserved Matters'. Reserved Matters Applications ('RMA') are planned for a future date for individual plots, zones or phases in their entirety, or by individual buildings within a plot or phase.
- 4.76 The Outline Component in the borough would be a maximum floorspace cap of 373,000 sqm (GEA). This floorspace would be split between 234,857 sqm (GEA) of Class C3 residential floorspace and 138,143 sqm (GEA) non-Class C3 uses including other forms of residential or commercial floorspace.
- 4.77 Reserved matters are those aspects of a proposed development which the Applicant chose not to submit in detail with the outline planning application, (i.e. they are 'reserved' for later determination). The outline application seeks all matters be reserved. This means that the access, appearance, landscaping, layout and scale are all proposed as future RMAs. Reserved Matters are defined in Article 2 of the Development Management Procedure Order (2015), as the following:
- **Access** – the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.
 - **Appearance** – the aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.
 - **Landscaping** – the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: (a) Screening by fences, walls or other means; (b) The planting of trees, hedges, shrubs or grass; (c) The formation of banks, terraces or other earthworks; (d) The laying out or provision of gardens, courts, squares, water features, sculptures or public art; and (e) The provision of other amenity features.
 - **Layout** – the way in which buildings, routes and open spaces within the development are provided, situated, orientated in relation to each other and to buildings and spaces outside the development.
 - **Scale** – the height, width and length of each building proposed within the development in relation to its surroundings.

- 4.78 As summarised above, each RMA application would be required to demonstrate compliance with a suite of control documents. These include the Development Specification, the Parameter Plans, Design Code, plus conditions / obligations attached to a planning approval. Each of these is summarised below.

Development Specification

- 4.79 An updated Development Specification document (August 2025) is submitted for approval, in support of the outline component. This document defines the proposed detailed and outline components of the development, the quantum of floorspace, units and floorspace for each land use, public realm and car / cycle parking. It contains a description of the Parameter Plans and a schedule of the detailed drawings. The Development Specification defines the scope and extent of the development and sets out the overall scale of outline component of the development proposed, in terms of maximum height and siting of buildings, floorspace, uses, basement demise, and areas of public realm and open space.

Parameter Plans

- 4.80 As summarised above, the Parameter Plans define the physical framework and principal spatial layout and arrangement of the outline component of the proposed development. The parameter plans outline matters including the proposed range of land uses, maximum building heights, areas of development and landscaping. The parameter plans include 'limits of deviation' that sets both minimum and maximum parameters for building footprints and heights.

- 4.81 In total, 14 Parameter Plans are proposed for approval:

- 001 - Hybrid Application Sites)
- 002 - Demolition Plan
- 003 - Existing Site Level Plan
- 004 - Development Zones, Maximum Building Lines and Public Realm Plan.
- 005 - Proposed Plot Plan
- 006 - Proposed Maximum Heights Plan
- 007 - Proposed Public Realm Typologies
- 008 - Proposed Access and Movement Plan
- 009 - Proposed Site Levels – Ground Floor Plan
- 010 - Proposed Site Levels – Below Ground Floor
- 011 - Proposed Land Use Ground Floor Level
- 012 - Proposed Land Use Upper Levels
- 013 - Proposed Land Use Below Ground Floor
- 014 - Urban Design Plan

- 4.82 The Parameter Plans are intended to guide the submission of any future reserved matter applications submitted for the layout and scale of future development plots/zones. The plans control deviation beyond the maximum parameters although it would be possible to build up-to the maximum limits. This means that the final ground level/upper-level building line or façade height may differ from those currently drawn on the plans. In some instances, the building line drawn on the plan is the maximum outer limit, and the as built building line could only move behind the line (i.e. into the site) and in other circumstances flexibility is permitted for the final building line to move in front or

behind the building line as currently drawn. The lines of deviation therefore provide flexibility for the building mass to come forward and allow for landscaping and spill out spaces alongside space for entrances and private defensible spaces at ground level.

- 4.83 Amendments to the Parameter Plans are summarised in paragraphs 4.6 – 4.7 above.

Design Codes

- 4.84 The Design Code document provides design guidance and is intended to inform the future design development of the outline components of the site. Together with the development specification document and parameter plans, the Design Code document will provide the primary design information to inform the preparation of subsequent applications for approval of Reserved Matters on individual development plots. The Design Code will include mandatory and guidance design rules for the RMAs and provide the Council with sufficient clarity to assist the evolution of detailed design of future phases. The Design Code set standards and guidance on how buildings should form streets and relate to public spaces, identify indicative materials and the design principles to be pursued and the requirements for public realm biodiversity, landscaping and planting requirements.

- 4.85 The Design Code Addendum covers amendments and clarifications made in response to consultation comments regarding the Design Code as originally submitted. These included clarifications linked to updated Parameter Plans; clarifications regarding details of flexibility of land uses; amendments regarding safeguarding the potential for future pedestrian connections to the existing estates and to Cromwell Road; and the addition of design guidance for a potential new square alongside West Kensington Station. The merits of the Design Code document is covered in more detail below in the Design section.

Illustrative Masterplan

- 4.86 In addition, an Illustrative Masterplan has been developed to assist with the assessment of the likely environment impacts of the proposed development. This assessment is set out in the Environmental Statement submitted with the application. The Illustrative Masterplan is submitted in support of the proposals for information purposes only and the drawings are therefore not for approval. The purpose of the Illustrative Masterplan is to demonstrate how a development might be realised based on the supporting control documents. As the control documents afford a level of flexibility, the Illustrative Masterplan represents one way in which the proposed development could come forward within the broad controls of the Parameter Plans and other control documents.
- 4.87 The Illustrative Masterplan does not represent the worst-case scenario (based on the Parameter Plans). The Illustrative Masterplan is simply a means of testing the control documents and has been used for the purposes of producing some of the technical assessment documents. The Illustrative Masterplan has formed the basis for some of the assessments underpinning the application, most notably the Financial Viability Appraisal (FVA), and has also been used to aid the commentary in the Environmental Statement, including the Townscape,

Built Heritage and Visual Impact Assessment chapter. The Illustrative Masterplan document and the DAS Volume 1: Outline Component provide further information in relation to these principles and include alternative illustrations, images and plot studies, which consider different ways in which the control documents could be interpreted in terms of use, built form, architectural expression and public realm / landscape design.

- 4.88 The Illustrative Masterplan shows a land use allocation which equates to approximately a 60:40 ratio of residential vs non-residential uses and indicatively provides circa 3,100 homes and circa 220,000 sqm GEA of commercial floorspace.

Phasing

- 4.89 An Indicative Phasing Strategy is proposed. The Development is proposed to be delivered across eight main phases, over an estimated build out programme of approximately 19-20 years.
- 4.90 The Hybrid Application considers the following phase sequencing (see below).

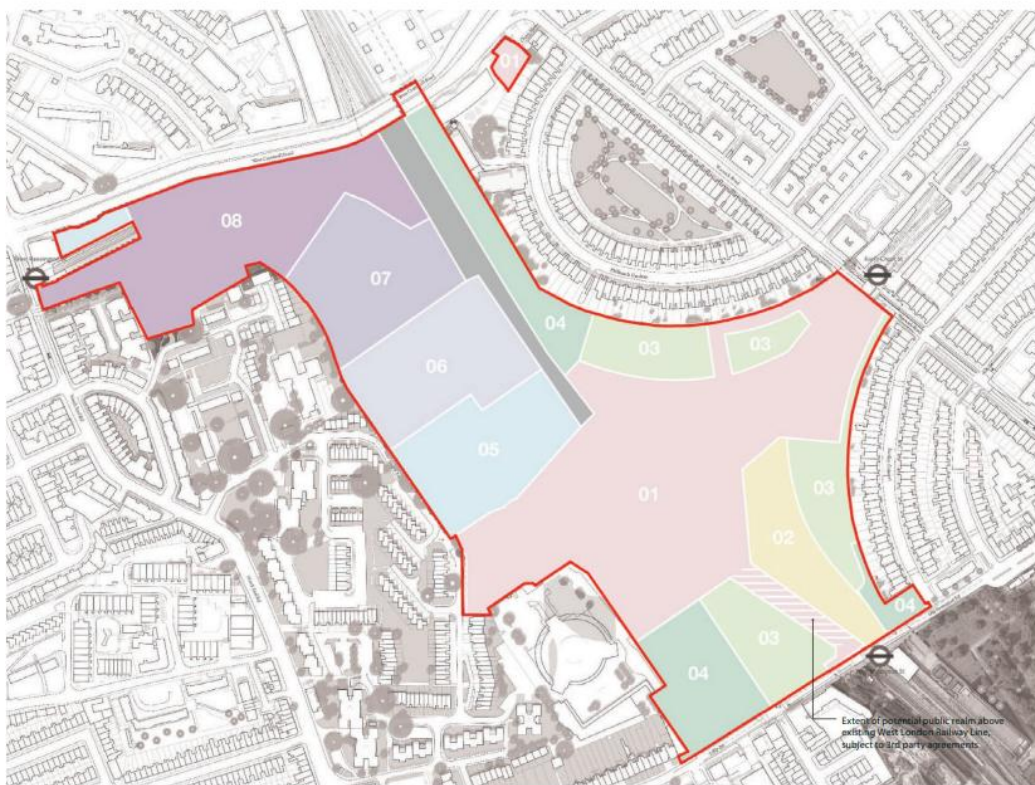


Figure 11: Indicative Phasing Plan

- 4.91 The Environmental Statement specifies that substantial infrastructure and preparatory works will be required ahead of the commencement of any construction works for Phase 1, with demolition works integrated in other phases. Separate applications for relevant approvals and consents would therefore be required for the early infrastructure works. These are included in the ES assessment. Mitigation measures are proposed to come forward for the key public transport infrastructure in the area, including works to West

Brompton and West Kensington Station. These works are expected to come into effect in the form of separate applications or approvals.

- 4.92 The indicative development programme presented in the ES supposes that if planning permission is secured in the latter part of 2025, the essential early infrastructure and other preparatory works might commence in latter part of 2026. Based on this timeframe, it's estimated that a comprehensive, site-wide masterplan could be delivered by mid-2043. This is an ambitious programme for a development of this scale and complexity and will be dependent on obtaining vacant possession of the Lillie Bridge Depot land in a timely manner and on a series of other factors including market sales. The Applicant states that whilst an indicative programme has been agreed with London Underground Limited ("LUL") for the release of the Lillie Bridge Depot land, it is a complex process, subject to ongoing review, detailed preparation and design, and additional consents. Any change or delay in obtaining vacant possession of the Depot land beyond the timescales indicated is therefore a possibility which needs to be considered.
- 4.93 The proposed programme presented in the two images below consists of two possible scenarios, both of which involve the Early and All Phases, including the Later Phases.
- **Phases 1-4 (the 'Early Phases')**, involving land under the ownership of ECPL across both boroughs. This includes the former Earls Court Exhibition Centre land, land in Empress Place and 2-26 Lillie Road. The Early Phases are anticipated to be completed in 13 years.
 - **Phases 5-8 (the 'Later Phases')** includes the Lillie Bridge Depot Land ('LBD') under the ownership of Transport for London (TfL). These phases are anticipated to be completed in a period of 6 years.

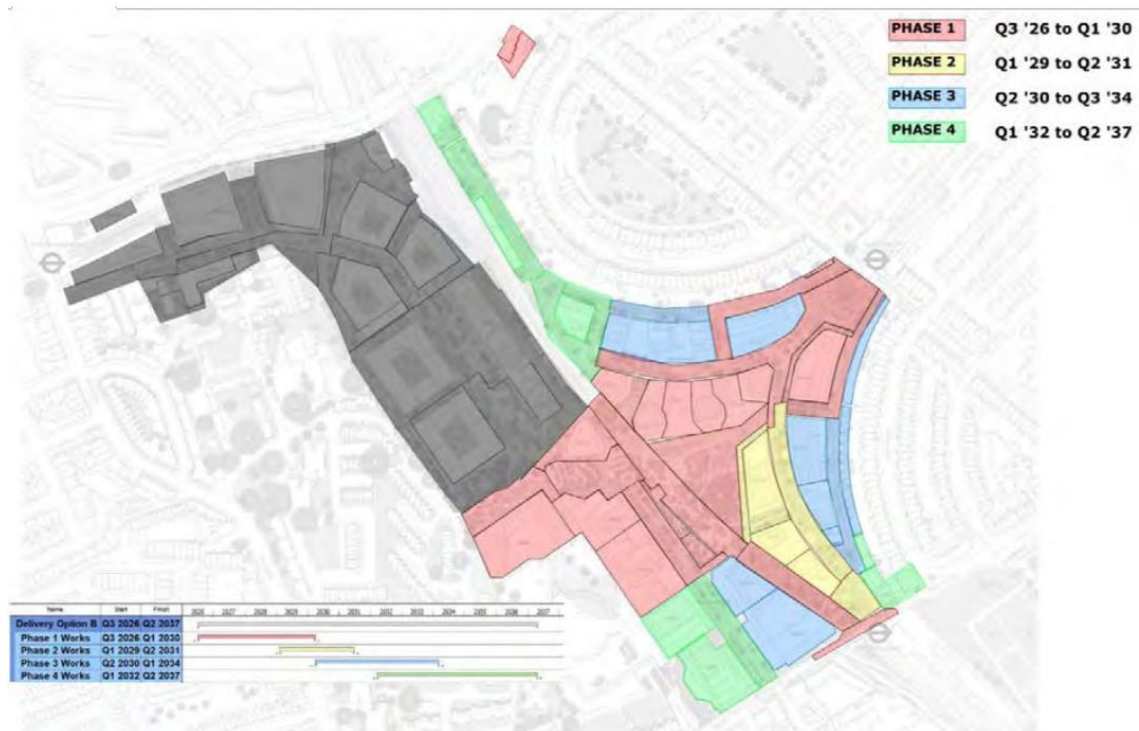


Figure 12: Indicative Phasing Plan - Early Phases

Early Phases	Duration	Start Date	Completion Date
Phase 0 Infrastructure	146 months	Q4 2024	Q2 2032
Phase 1	51 months	Q3 2026	Q1 2030
Phase 2	27 months	Q1 2029	Q2 2031
Phase 3	45 months	Q2 2030	Q1 2034
Phase 4	63 months	Q1 2032	Q2 2037



Figure 13: Indicative Phasing Plan – All Phases.

All Phases	Duration	Start Date	Completion Date
Phase 0 Infrastructure	146 months	Q4 2024	Q2 2037
Phase 1	51 months	Q3 2026	Q1 2030
Phase 2	27 months	Q1 2029	Q2 2031
Phase 3	45 months	Q2 2030	Q1 2034
Phase 4	63 months	Q1 2032	Q2 2037
Phase 5	36 months	Q4 2032	Q2 2035
Phase 6	33 months	Q2 2035	Q1 2038
Phase 7	30 months	Q3 2037	Q1 2040
Phase 8	54 months	Q4 2037	Q2 2043

Table: Environmental Statement: Non-Technical Summary

4.94 The two possible scenarios are:

(1). Completion of an All-Phases Development (i.e. Early and Later Phases)

This comprises the entirety of the proposed development, in both boroughs, with the Depot Land being released within the planned programme. Currently the All-Phases development is projected for completion by 2043, with the first residential homes in Phase 1, coming forward for occupation by 2030.

(2). Completion of an Early Phases Development with delay to completion of the Later Phases

Phases 1-4 (the 'Early Phases') are programmed to take approximately 13 years to complete (by mid-2037). The option considers that the Depot Land would remain operational beyond the current proposed timescales, with a potential delay or failure to release the Depot Land. For this reason, the Later Phases could be delayed and delivered to a different programme. This could potentially take the proposed development beyond the 19-20 years anticipated in the All-Phases scenario above.

4.95 TfL forms part of the joint venture with the Applicant and have assured their commitment to enabling the LBD land to be redeveloped as part of the proposed development. In 2022, TfL entered into a conditional land sale agreement with the Applicant, for the sale of the land on a long lease, which would be released for redevelopment, upon the grant of planning permission and achievement of vacant possession. The LBD is operational land, used by TfL and LuL for training and maintenance facilities. For the development of the LBD land to take place, the existing operations will need to be relocated off-site.

4.96 The vacant possession, relocation and construction phase is currently expected to take several years. This has shaped the indicative phasing strategy proposed. TfL has begun the process of preparing a vacant possession strategy

(including initial feasibility), to demonstrate the relocation of existing operations are feasible. It has identified potential off-site locations for its existing operations. A preliminary strategy is outlined within the Lillie Bridge Depot Preliminary Relocation Strategy document. This supporting document identifies the next steps required, including preparation of the anticipated receiver sites for operations which require relocation, for which TfL will approach the relevant LPAs regarding any necessary consents.

- 4.97 The Environmental Statement supporting the application considers both possible scenarios. Further information relating to phasing and the risks of not realizing a comprehensive development are considered further in this report.

Accessible Open Space and Public Realm

- 4.98 The Development is designed to be connected by a sequence of spaces and gardens, with the largest open space in the centre of the site. Building plots in each development zone would be designed in a grid form, connected by streets, servicing areas or pedestrianised routes. Areas of public realm and amenity space will be provided at different levels to maximise biodiversity, urban connectivity and access. The spaces would be incorporated into the existing level changes across the site. Public realm is defined as publicly accessible areas and would include both hard and soft landscaping. A new park 'Table Park' would span the West London Line cutting. This park would form a significant 'arrival' space for pedestrian, cycle, and vehicle access and include both hard and soft landscaping.
- 4.99 In terms of overall public realm provision, the Illustrative Masterplan includes approximately 8.25ha provision (3.92ha within the RBKC and 4.33ha within the LBHF areas of the Site) with 55% of the Site remaining unbuilt and open once completed. The Table open space will provide an area of at least 0.7ha and will act as the central focus of the interconnected network of public open spaces that the Proposed Development will provide. Public realm includes open spaces between buildings that available to public use, including streets, squares and areas of public open space. The key areas of public open space proposed would comprise the following:
- **The Table:** Public open space at the heart of the proposals
 - **Table Park:** A destination park providing a nature led landscape area at the centre of the masterplan.
 - **Destination Square:** Lillie Sidings is designed as an urban square within the Lillie Bridge Depot Land, designed to pay homage to the industrial heritage of the site and could include outdoor events.
 - **Community Green:** Aisgill Gardens. Southern part of the gardens would be delivered as part of the Early Phases and provide a play focussed space surrounded by community uses. The northern part of the community gardens would be completed as part of the All-Phases scenario as this part of the land currently lies within the depot land.
 - **Squares:** Provide connections from key public transport hubs and provide activation for public spaces. Warwick Square and West Brompton Square are in RBKC and West Kensington is in LBHF.

- **Bioline:** Existing area of biodiverse habitat along the WLL which forms part of a Site of Importance for Nature Conservation (SINC). Proposals include the formation of a deck over part of the WLL to provide an alternative connection through the development. This is subject to agreement of Network Rail and therefore not certain if it will be delivered in the Early Phases. Currently the application assumes that it will not be delivered. Strategies are therefore proposed for enhancing ecology to improve the connectivity of the existing SINC.
 - **Boulevard:** Empress Place Boulevard would provide a vehicle free route from Lillie Road to the centre of the site providing one of the three main pedestrian and cycle connections in the borough. A second boulevard would come forward via Beaumont Avenue as part of the All-Phases Scenario and would connect to Lillie Sidings.
 - **Series of vehicle and vehicle free routes and lanes** providing connections to facilitate access for walking, cycling and essential vehicle parking/servicing and deliveries, refuse collection and emergency access.
- 4.100 A total of 4.23 ha (3.11 ha in RBKC and 1.12 ha in LBHF) would be delivered in the Early Phases with a minimum of 0.756 hectares delivered at ground level across the detailed components. Open space would be delivered in LBHF, in the form of a communal play space area between T1 and T2 two building in WB05.
- 4.101 Communal terraces for residents would be provided, designed as resident gardens at podium level for the occupiers of Plots WB03 and WB04. Plot WB03 would include two shared roof terraces for student residents at Level 31. Plot WB04 would provide access at level 39. Plot WB04 also provides private terraces at Levels 33 and 37. Private balconies would be provided at Plots WB04 and WB05. Where balconies are not provided, residents will have access to communal open spaces or internal amenities.
- 4.102 The majority of public realm is proposed in outline and will come forward in future RMAs. Parameter Plan (ref. 004), confirm the location and extent of the public realm and the Design Code provides guidance on the quality, including details in respect of microclimate; planting; green and blue infrastructure; materiality; and street furniture.

Trees

- 4.103 Extensive landscaping would be provided across the Proposed Development as a whole. The Urban Greening Factor (UGF) has been tested for two scenarios. The first scenario illustrates the maximum plot extent as show on the parameter plans. The second scenario uses the illustrative building layouts to test the UGF Illustrative Landscape Scheme. Both scenarios present a UGF score of 0.4, which meets the policy requirement.
- 4.104 The detailed component would deliver 144 trees and extensive landscaping and planting at ground and podium level. For the outline component, an Illustrative Landscape Scheme has been prepared to demonstrate one way in which the Urban Greening Factor (UGF) commitment could be delivered. The detailed

plots are included in the illustrative scheme and has formed the basis of the assessment of the outline component:

- Delivery of approximately 723 trees within the Early Phases with approximately 268 trees in LBHF
- Delivery of approximately 1,343 trees within the All Phases
- Delivery of extensive landscaping and planting at ground and podium level.

4.105 Based on assumptions of the UGF Illustrative Landscape Scheme, the proposed development would deliver circa. 867 trees within the Early Phases development scenario and 1,487 trees within the All-Phases development scenario.

4.106 An assessment of all the existing trees on the Earls Court Development site was undertaken in February 2024. A total of 160 trees were recorded (4 – Category ‘A’ trees / 88 Category ‘B’ trees / 60 Category ‘C’ trees and 4 Category ‘U’ trees). This includes existing trees located in the SINC. In total 57 trees were identified on the LBD land.

Play Space

4.107 The Proposed Development will provide play space distributed throughout the open spaces. Spaces would come forward in phases and in the form of natural play and designated playgrounds with less formal play equipment in accompanying open spaces. Calculations are based on 10 sqm of play space per child expected to occupy the development, considering residential size and tenures. Calculated in line with the play space standards set out in the Mayor of London’s 2012 Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance (‘SPG’). Further information is provided below.

4.108 In terms of play space, the Detailed Component would provide doorstep play within the WB04 podium and WB05 courtyard. In total 605sqm is provided on-Plot (0-4 Age Group), with the remainder provided in Aisgill Gardens adjacent to the Plot.

4.109 For the outline component the proposed play strategy intends to meet the play needs of all children and young people expected to occupy the development on-Site. In the DAS Volume 1: Outline Component Masterplan, a number of scenarios have been tested to ensure that play space requirements will be met as part of RMAs, including based upon a maximum development scenario. The Outline Component also includes extending the existing compromised MUGA on Aisgill Avenue, which will provide play for older children both on the estates and development.

4.110 The Design Code requires dedicated play areas to be located in the public realm and that should be accessible, welcoming and open. It provides guidance on:

- Natural surveillance
- Carer Provision

- Clear sight lines
- Materiality

Amenity Space

- 4.111 LBHF Planning Guidance SPG Key Principle HS1 states that all new dwellings should have access to an area of amenity space, appropriate to the type of housing being provided. New family (3 or more bedrooms) dwellings should have access to amenity space of not less than 36 square metres.

3 Bed External Amenity

36sqm amenity space per unit required by HS1 Planning Guidance SPD (2018)

Plot	3 Bed Units	Requirement	Provided
WB03	0	N/A	N/A
WB04	30	1080m ²	2826.5m ²
WB05	58	2088m ²	1142m ² - within WB05 946m ² - Aisgill Garden

- 4.112 WB04 residents have access to a number of external amenity spaces at podium level and communal amenity terraces are also provided at the upper floors of the building. Internal communal amenity areas are also provided (including the rooftop 'Conservatory'). WB05 residents will have access to communal outdoor amenity within the courtyard. Communal amenity will also be available for both WB04 and WB05 residents within the wider proposed public realm (Outline Component), including Aisgill Gardens directly adjacent to the plots.

Basement

- 4.113 Unlike the previous outline 2013 permission, the extent of proposed development at basement level is limited, especially in the Development Zones proposed in LBHF. Parameter plans 010 - Proposed Site Levels – Below Ground Floor and 013 - Proposed Land Use Below Ground Floor specify where space below ground level could be provided. This space is predominantly to be for ancillary servicing purposes and not as living accommodation.

Access and Circulation

- 4.114 The proposed development is designed to improve local connectivity for pedestrian, cyclist and vehicular access. New pedestrian routes would unlock the existing site, currently precluded by infrastructure. Parameter plans indicate areas where vehicular access points to the development could be situated, thus providing better connectivity between the application site and its surroundings.
- 4.115 Details of the proposed highway works are set out in the Transport Assessment and would be secured through the Section 106 Agreement. The works would include carriageway and footway alignments at the entrance points to the site, contributions towards cycle improvements, pedestrian crossings and junction improvements and public realm improvement works. These works are covered in Section 16 of this report.

Car Parking

4.116 A site-wide Transport Assessment and Framework Travel Plan is submitted with the application. The documents set out a strategy for promoting sustainable modes of transport and reducing reliance on car use. The development is proposed to be 'car lite', with car parking spaces specifically designated for disabled persons only, except for a small quantum of visitor spaces. A maximum of 205 car parking spaces is projected across both boroughs (131 in LBHF and 74 in RBKC).

4.117 For the detailed component, the LBHF application would provide 16 car parking spaces comprising: 15 residential spaces and 1 non-residential space. The breakdown for the residential spaces is provided in the table below.

Plot	Land Use	Quantum	Proposed Disabled Persons Car Parking Provision from Outset
WB04	Residential	278 homes	9 spaces
WB05	Residential	178 homes	6 spaces
Total		456 homes	15 spaces (3.3%)

4.118 The RBKC detailed component would provide 12 car parking spaces.

4.119 The final number of car parking spaces for the outline component will be determined at RMA stage when the residential unit mix and non-residential floorspace proposed by each RMA come forward for approval. A maximum cap of car parking spaces is proposed and is estimated based on the maximum floorspace and mix of land uses. The total car parking spaces provision for the outline component is for up to 177 spaces: 115 car parking spaces in LBHF and 62 spaces in RBKC.

4.120 The LBHF outline car parking spaces breakdown would consist of the following maximum quantum:

- Residential (Blue Badge): 62 spaces
- Non-residential: 15 spaces
- Others (Visitor): 23 spaces
- Other (Car Club): 15 spaces

4.121 Consideration of the breakdown of the car parking spaces for the land uses within the detailed and outline components is expanded on within Section 16 of this report.

Cycle Parking

4.122 Cycle parking for the detailed and outline components would be provided in accordance with the Minimum Cycle Parking Standards set out in the London Plan (2021).

- 4.123 As per the car parking requirements, the final cycle space numbers required for the outline element will be determined at the RMA stage, when the final residential unit mix and non-residential floorspace proposed by each RMA comes forward for approval. However, based on the outline submission, set around the maximum parameters and controls on the maximum floorspace per land use, a maximum number of cycle spaces required for both the outline and detailed components has been calculated.
- 4.124 Taking the Detailed Component in isolation, the proposal would comprise a total of 1,347 long stay and 180 short stay cycle spaces (total 1,527 cycle spaces). The breakdown of cycle parking/land uses proposed for the Detailed Component is as follows:

Land Use (Use Class)	Cycle Parking Long Stay	Cycle Parking Short Stay	Cycle Parking Total (Land Use)
Residential (C3)	805	14	819
Student (Sui Generis)	522	18	540
Leisure (F2)	4	21	25
Flexible Retail/F&B/Commercial (E(a) / (b) / (c))	14	114	128
Community /Social (F/E (g))	2	13	15
TOTAL	1,347	180	1,527

- 4.125 Further consideration of cycle parking provision for the land uses within the detailed and outline components is expanded on within Section 16 of this report.

Building Heights

- 4.126 Building heights would vary across the development, and range between 3 and 42 storeys. The Proposed Maximum Building Heights Parameter Plan (ref. 006) covers the building heights permitted for the Outline Component. The proposed built form, height and massing are designed to respond to the different characteristics of the site and its surroundings, with the height and scale transitioning from the edges. The tallest buildings in LBHF would be clustered to the north-east of Empress State building, within a new group of buildings and two within RBKC that form the detailed component. The remaining tall buildings would be part of the outline component. They would include a secondary cluster of tall buildings to the north-west of the site next to the (A4) West Cromwell Road.

4.127 Three tall buildings of 18, 33 and 42 storeys are proposed in detail in Phase 1. A further tall building in this phase (Plot WB06) is proposed in outline.

4.128 The maximum building heights specified in the outline component take into consideration the varying ground levels across the site. The proposed building heights are illustrated as Above Ordnance Datum (AOD). The commercial uses at ground floor are based on an overall ground floor height of approximately 4m. Floor to ceiling heights for lab and office floors would be 4.5m. The Mayor of London's Housing Quality and Standards require a minimum floor to ceiling height of 2.5metres for all new dwellings in the capital. The indicative heights provide a level of flexibility for future tenants.

4.129 The table below provides the overall maximum height parameters indicated within the parameter plans with indicative storey heights and proposed predominant land uses.

Development Zone (LBHF)	Development Plot (LBHF)	Maximum Height AOD (m)	Indicative Storeys	Proposed / Predominant Use
B1	WB07	+69.5	13	Commercial
B2 (RBKC)	WB08	+69.5	13	Commercial
C	WB01	+44.3	8	Commercial / Residential
	WB02	+73.6	15	Commercial / Residential
G1	WB09	+12.5	1 (exe. Basement)	F&B/Retail/Flex Commercial
G2	WB10	+16.5	1 (exe. Basement)	F&B/Retail/Flex Commercial
H	WB03	+112.4	33	PSBA
	WB04	+158	42	Residential
	WB05	+62.2	18	Residential
I	PAV-AG	+12.5	1	
N	WB06	+106.4	29	Residential
P	WK13	+11.7	1	
T	WK08	+60.7	14	Residential
	WK09	+90.7	24	Residential
U	WK10	+51.1	12	Residential
	WK11	+46	9	Residential
	WK12	+42.6	9	Residential
V1 (LBHF)	WK06	+60.9	15	Residential
V2 (RBKC)	WK06	+60.9	15	Residential
W	WK05	+85.5	22	Commercial / Residential
	WK07	+61.6	15	Commercial / Residential
X	WK02	+31.4	5	Commercial / Residential
	WK03	+55.9	9	

	WK04	+74.5	16	Commercial / Residential Commercial / Residential
Y	WK13	+12.5	1	
Z	WK01	+44.2	10	Residential



Figure 14: 3D Image showing proposed building heights (detailed plot heights in black)

Materials

- 4.130 The material and façade treatment are defined in full for the detailed plots. Plot WB03 (student building) would be faceted and comprise of precast concrete (light beige shade with dark bronze glazing and slate blue shade with dark grey surrounds). Lower floors would comprise a double height lobby. Plot WB04 is expressed as a waterfall design throughout. The façade would feature a glass curved entrance, bronze ribbed metal spandrels, metal tubes running along the façade from top to bottom, together with reconstituted stone and metal framed windows. The top would feature metal cladding and curved glazing units. In contrast, WB05 seeks to mediate and comprise buildings in brickwork in different colour tones. Building T1 references Art Deco typologies with solid metal balconies located on the corners. T2 comprises of a building which references a mid-range 1930's style with expressed brickwork and corner balconies like T1.

- 4.131 The material palette for the outline component would be confirmed at the reserved matters stage. The design and form of the different development plots is informed by the design code, setting out the key principles for the palette and varied façade treatments. These are considered in greater detail with Section 12 of the report.

Character Areas

- 4.132 The proposed Earls Court development is designed around seven Character Areas.

- The Table: Destination Park in the centre of the site. Cafes and restaurants would activate the edges and water features within the Cascades would address the level changes. Potential green deck proposed to follow the West London Line (“WLL”).
- Empress Place: Existing street extending into boulevard forming main south/north spine from Lillie Road. Commercial led quarter with active ground level uses leading to central park.
- Aisgill Gardens: Community green linking established housing estate with the proposed development providing play focussed space and community uses.
- Lillie Sidings: A destination square extending along the north/south link. Existing historical features of the former and existing industrial and railway works on the site are proposed to be secured with the retention or part retention of key buildings or structures. Proposed to be used for commercial and active ground floor uses along with new residential homes on the upper levels.
- West Kensington: Creative/employment led quarter, with office buildings. Tree-lined boulevard would provide access to Lillie Sidings from Beaumont Avenue.
- West Brompton: Crescent linking Earls Court and West Brompton stations with commercial/retail quarter, abutting Eardley Crescent.
- Warwick Crescent: Residential quarter abutting Philbeach Gardens.

- 4.133 Five Character Areas (The Table, Empress Place, Aisgill Gardens, Lillie Sidings and West Kensington) are in LBHF. The Table, Empress Place and part of Aisgill Gardens are proposed to come forward in the Early Phases with the remaining section of Aisgill Gardens, Lillie Sidings and West Kensington proposed in the Later Phases. Aisgill Gardens would come forward as part of a phased approach. The full extent of Aisgill Gardens is expected to be completed in the Later Phases following the release of the Lillie Road Depot land for development. The Character Areas are explained in detail in the Section 12 of the report.

RBKC APPLICATION

- 4.134 The detailed proposals are for:

- Two buildings linked by a public open space, including play space, providing 310 residential units
- A ground-floor nursery

- A ground-floor food and beverage (F&B) unit and
- Car and cycle parking spaces

4.135 The outline proposals are for:

- Up to 130,000sqm of residential floorspace and ancillary facilities.
- Non-residential floorspace including up to 95,000sqm of commercial uses, up to 7,000sqm of cultural uses and up to 10,000sqm of retail uses.
- Flexibility in the mix of residential and non-residential uses, with the total floorspace capped at 204,000sqm, landscaped public open space including a street network and a new park (shared with LBHF) in the centre of the site.
- Public pedestrian and cycle access across the borough boundary into LBHF.

SUBMITTED DOCUMENTS

4.136 The following documents have been submitted in support of the application:

- Planning Statement
- Development Specification, Parameter Plans and Design Code. Includes and Illustrative Masterplan
- Design and Access Statement for both the detailed plots, outline component and illustrative masterplan and includes a Landscape Strategy
- Environmental Statement. Includes the Technical Appendices and a Non-Technical Summary
- Indicative Phasing Strategy
- Template Reconciliation Statement
- Affordable Housing Delivery Statement
- Affordable Workspace Strategy
- Arboricultural Impact Assessment
- Biodiversity Net Gain Assessment
- Urban Greening Factor Plan
- Illustrative UGF Categories (per plot)
- Commercial Strategy
- Cultural Strategy
- Retail Strategy
- Student Needs Assessment
- Economic Inclusion Statement
- Lillie Bridge Depot Preliminary Relocation Statement
- Temporary Uses Strategy
- Town Centre Impact Assessment
- Construction Site Waste Management Plan
- Energy Strategy & Statements
- Equalities Statement
- Estate Management Framework
- Financial Viability Assessment (LBHF)
- Flood Risk Assessment & Drainage Strategy
- Drainage Statement
- Integrated Water Management Strategy

- Fire Strategy – detailed plots and site wide plus Gateway 1 Form - WB03, WB04 & WB05
- Housing Statement
- Public Benefits Statement
- Impacts on Neighbours: Contextual Daylight, Sunlight & Overshadowing Report including Amenity within the Site
- Internal Daylight, Sunlight & Overshadowing Assessment
- Overheating Risk and Thermal Comfort Strategy
- Sustainability Statement – Detailed plots and site wide Sustainability Strategy
- Security Planning Report
- Social Value Statement
- Statement of Community Involvement
- Transport Assessment – including Draft Delivery & Servicing Plan / Draft Operational Waste Management Strategy / Draft Parking Design & Management Plan Draft Travel Plan / Framework Delivery & Servicing Plan / Framework Parking Design and Management Plan / Framework Travel Plan / Framework Basement Impact Assessment / Framework Construction Management Plan / Framework Construction Traffic Logistics Plan / Operational Waste Management Strategy / Construction Management Statement
- Whole Life Carbon and Circular Economy Strategy
- Earls Court Development Contextual Report
- Engineering Services: Generator Schedule
- Utilities & Services Infrastructure Strategy
- Ventilation and Extraction Statement
- ECDC Letter dated 4 September 2024
- Imperial College London letter dated 4 July 2024

5 PUBLICITY AND CONSULTATION

Engagement: Statement of Community Involvement

- 5.1 Details of the public consultation undertaken by the Applicant at the pre-application stage and during the determination of the planning application are provided within the submitted Statement of Community Involvement (SCI), prepared by Kanda Consulting and summarised in the ES. In summary, the initial "SCI" statement, dated July 2024, provided a record of the public engagement undertaken by the Applicant during a four-year period, up to the planning submission. The SCI Addendum, dated July 2025, summarises the continued engagement post planning submission (between August 2024 and July 2025) and includes a summary of the amendments made to the proposed development.
- 5.2 The SCI describes how the Applicant established the project team, how the emerging proposals for the future development of the site evolved and how stakeholders were given the opportunity to provide feedback on the early design principles and helped shape the proposals. The SCI gives details of the feedback sought through a series of development stages, up to the submission

of the planning application to the Council in July 2024, and more recently through the amendments to the scheme.

- 5.3 In 2020, the Applicant ran a design competition to appoint a masterplan architect. Hawkins Brown and Studio Egret West were appointed as joint architects, to develop a masterplan vision and lead on the outline components. The detailed components are designed by a separate team of architects for each development plot. The design work for development plots in LBHF (WB03, WB04 and WB05) is overseen by Serie, Sheppard Robson and dRMM, alongside landscape architect LDA Design. Further architectural practices are expected to be invited to compete for subsequent reserved matters details.
- 5.4 The Applicant has engaged with the local community for over five years. This has been through a series of pre-application consultation events, exhibitions, workshops, meetings, group sessions, presentations and feedback sessions, tours of the site, newsletters, local advertisements, website, social media, letters, emails, local posters and fliers. Engagement has been with members of the public, stakeholder groups, statutory bodies, as well as extensive engagement with GLA, TfL, RBKC and LBHF officers. Conversation Corner, on Lillie Road, was opened to the public in October 2022, to facilitate the consultation process.
- 5.5 The consultation process has also included discussions with other statutory consultees, including Historic England, Royal Parks, Health and Safety Executive, Environment Agency, Thames Water, National Air Traffic Services, Network Rail, London Underground Limited, Mayor's Office for Policing and Crime (MOPAC) and Metropolitan Police - Secured by Design.
- 5.6 Engagement has included the establishment of four independent design review panels. The proposed development has been presented to LBHF / RBKC / GLA and Historic England between 2020-2024. Full details of all the sessions are set out in the SCI and summarised in sections of this report.
- 5.7 The pre-application process broadly comprised of the 4 key stages:
- Stage 1: Framing Priorities (May 2020 – June 2022)
 - Stage 2: Design Development (June 2022 – February 2023)
 - Stage 3: Finalising the Masterplan (February 2023 – July 2024)
 - Stage 4: Post Submission of the Planning Applications (September 2024 – to date)
- 5.8 In 2020, the first round of engagement focussed primarily on understanding the site and local area context. This was followed in 2021 and beginning of 2022, by a range of activities, tours of the site, development of some of emerging principles and engagement on the vision to 'bring the wonder back' to Earls Court. The initial illustrative masterplan layout was shared with the public in the summer of 2022. Public consultation events on the first draft masterplan took place in February 2023. Further public consultation events on the updated designs took place in November 2023 and March 2024. In parallel, the detailed plot architects were selected in the autumn of 2022 and began collaborating

with the LPAs on the detailed components. The first plot designs followed and were refined and integrated into the wider masterplan from the beginning of 2023 onwards. Feedback received during the initial pre-application discussions and public consultation events resulted in the removal of one of the proposed tall buildings in the LBHF Detailed Component and in its place, the development of a single landmark building (WB04). The RBKC Detailed Component was also revised. The proposed heights of the two tallest buildings were reduced from 32 and 27 storeys to 27 and 20 storeys respectively.

- 5.9 The evolution of the development proposals has been shared through a series of engagement events, community workshops and pre-application meetings. The SCI summarised eight key phases of engagement that took place up to the planning submission, with further engagement continuing during the determination of the applications.

Phase 1: Spring and Summer 2020 - focused on building a picture of the site and its history.

Phase 2: Summer 2021 - Three family fun days with a range of activities in place on and off the site and encouraging attendees to provide feedback via a survey. A total of 320 people attended these events.

Phase 3: Autumn 2021 - Stakeholder tours set out emerging guiding principles for the vision for the site.

Phase 4: Winter 2021 to Spring 2022 - Engaged on the vision to 'bring the wonder back' to Earls Court. Series of walks and workshops with local groups involving young and elderly residents. Community masterplan workshops begun. This involved in person events, a webinar and online surveys. There were 341 respondents to the online survey.

Phase 5: July 2022 - Launch of the first public consultation on the initial framework principles; Master planning workshops held for residents and businesses. Public Realm Inclusivity Panel ("PRIP") was formally launched. The PRIP is made up of a group of local people who are involved in the design of public spaces.

Phase 6: October 2022 - Conversation Corner (Lillie Road) was opened. This has operated alongside a series of pop-up events at North End Road market and the neighbouring underground stations.

Phase 7: February to November 2023 - Draft Earls Court masterplan released for consultation. PRIP and community masterplan workshops continued.

Phase 8: November 2023 to May 2024 - Updated masterplan and first Phase One proposals presented for consultation in November 2023. In March 2024, an updated exhibition of detailed proposals for Phase One and series of neighbour workshops took place. In April 2024, a community masterplan workshop on transport and movement and neighbour workshops were held.

- 5.10 The Applicant states that during their engagement, an estimated 2,449 people visited 116 ECDC exhibition days and 27 public workshops, and 2,707 survey contributions have been provided from 1,518 unique respondents. Since the planning submission the Applicant adds they have visited over 3,000 properties resulting in 814 face-to-face conversations through doorstep engagement. Throughout this consultation process, the Applicant states they have sought to raise awareness of the project and the design development in a wide variety of

ways for people to be involved, to gather local knowledge, to inform the thinking and ambitions for the area and ensure a wide range of views are obtained from a representative cross-section of the community.

- 5.11 Consultation events have been aimed at residents, businesses, young and older people and disability groups, local meetings and forums (such as West Kensington Tenants and Residents Association meetings). The wide range of consultation events undertaken are summarised in the SCI document.
- 5.12 The Applicant states that the project team have continued to engage with the local community. In summary the Applicant adds they have distributed a newsletter twice to 36,000 residential addresses with details of the Hybrid Planning Application and information on how residents could participate in the LPA-led consultation process. The team have also attended a total of over 100 joint and individual post-submission meetings and technical workshops and covered a wide range of planning, design and technical topics. Between September and December 2024 information relating to the Hybrid Planning Applications was on display at Conversation Corner and residents and groups were notified and invited to attend to view the proposals.

Design Review Panels

- 5.13 The proposals have been subject of formal design review throughout the pre-application process. Here multiple reviews of the scheme have taken place and have informed evolution of the design approach to the masterplan, landscaping strategy, and detailed plot design; alongside consideration of the application documentation including design codes. Reviews have been undertaken by the following panels, the LBHF Design Review Panel (DRP), RBKC Quality Review Panel (QRP), and the GLA's London Review Panel (LRP). In addition, the emerging proposals were presented to Historic England's London Advisory Committee (LAC) on 19 September 2023.
- 5.14 The Proposed Development was presented to the LBHF DRP at five sessions: May 2023, July 2023, December 2023 and two further sessions in May 2024. Similarly, the RBKC QRP met in November 2022, February 2023, July 2023, November 2023 and April 2024. The GLA's LRP meetings on the Earls Court development took place in January 2022, 22 May 2022, 18 January 2023 and 19 June 2023. Overall, each of the panels have provided commentary which has influenced the design evolution of the proposed development. A summary of the outcome of these reviews is provided in the design section (Section 12) below.

Inclusive Design Review Panel

- 5.15 The proposals were presented to LBHF's Inclusive Design Review Panel (IDRP) in July 2023, January 2024, May 2024 and June 2024. Again, a summary of the outcomes of these reviews is provided in the design section below.
- 5.16 It is worthwhile noting that as part of their engagement strategy, a Public Realm Inclusivity Panel (PRIP) was launched by the Applicant in July 2022. This panel included recruitment of wide range of members of the public from across both

boroughs, to assist in developing the master planning, placemaking, landscape strategies for the site, with events held at Conversation Corner. Between September 2024 and June 2025. These four PRIP sessions were held exploring a range of topics.

STATUTORY CONSULTATION

- 5.17 The planning application has been the subject of public consultation since September 2024. The Council has publicised the application as per normal practice and in accordance with statutory requirements. This was done when the application was validated (September 2024) and in response to revisions received to the application (September 2025). A summary of all representations received during both rounds of the consultation are summarised below.
- 5.18 The proposals constitute a “major development” as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). The application was advertised on the following basis:
- Development is subject to an Environmental Impact Assessment
 - The scheme comprises a Major Development
 - The site is within a Conservation Area and affects the setting of Nationally Listed Buildings/Structures and a Locally Listed Structure.
- 5.19 Notification letters were sent to the adjoining occupiers, statutory consultees, and amenity groups/resident associations. Site notices were displayed around the perimeter of the site, and a press advert was placed in the local newspaper. On both occasions, the application was advertised for a period more than the statutory 30 days. In doing so, the Council has met and exceeded its statutory duty to advertise this major planning application, accompanied by an Environmental Statement, in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Initial Consultation (September 2024 – August 2025)

- 5.20 The first public consultation took place between 20 September and 25 November 2024 (65 days). Approximately 11,150 individual notification letters were posted to nearby addresses in the borough. A press notice was publicised in the local paper on 25 September 2024, and 22 site notices advertising the application were erected around the perimeter of the site and in the wider area (dated 25 September 2024). RBKC's statutory consultation also began on 20 September 2024 and ended on 25 November 2024. RBKC have notified almost 13,000 addresses, along with the statutory site and press notices. A list of all the representations received by LBHF from September 2024 are recorded in Appendix B and summarised below.

Second Consultation (September-October 2025)

- 5.21 The second consultation followed receipt of amendments to the original application submission. The amendments include updated information, and because of the revisions, involved adding information to the Environmental Statement. The application was publicised for a second time, between 10 September and 13 October 2025 (33 days), by way of statutory site notices

posted around the site; a press advert (published 10 September 2025) and 11,200 individual notification letters to surrounding occupiers, including residential properties / businesses in nearby buildings or streets, persons who commented during first consultation and all the statutory consultees. All the representations received up to the publication of the report have been recorded and are summarised below.

CONSULTATION RESPONSES

Statutory Consultees

- 5.22 Statutory consultees were notified of the application during the initial and second consultation.
- 5.23 Responses were received from the Greater London Authority (GLA), Transport for London (TfL), Environment Agency, Thames Water, Historic England, Greater London Archaeological Advisory Service (GLAAS), Health and Safety Executive, Sport England, Metropolitan Police, Network Rail, the NHS London Healthy Urban Development Unit, The Royal Parks, London Historic Parks and Gardens Trust, The Gardens Trust, Theatres Trust, Twentieth Century Society, Kensington Chelsea & Westminster Chamber of Commerce, UK Power Networks, Cadent Gas Ltd., BAA-Heathrow Airport, National Air Traffic Services (NATS) and London Heliport.
- 5.24 Representations were received from the following amenity groups/resident associations or organisations: Hammersmith Society, Fulham Society, Lillie Road Residents Association, West Kensington Estate TRA Secretary, The Earls Court Society, Friends of Brompton Cemetery, The Earl's Court Area Action Group (ECAAG), Edwardes Square, Scarsdale & Abingdon Association, Save Earl's Court Supporters Club (SECSC) and the RMT's Piccadilly and District West Branch.
- 5.25 As this is a major application accompanied by an Environmental Statement, the Ministry for Housing, Communities & Local Government (MHCLG) were notified, on both consultations, in line with the Environmental Impact Assessment Regulations.
- 5.26 Initial and subsequent comments and objections received have been considered. Recommended planning conditions have addressed some of the objections received. The responses are summarised below:

Greater London Authority (GLA)

- 5.27 As set out in Paragraph 1.23 of the report and under the terms of the Town & Country Planning (Mayor of London) Order 2008, the Greater London Authority (GLA) has been notified.
- 5.28 The application is referable to the Mayor of London under the following categories of the Schedule to the 2008 Order:
- **Category 1A:** "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".

- **Category 1B (c)**: “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.”
- **Category 1C (c)**: ‘Development which comprises or includes the erection of a building more than 30 metres high outside the City of London.

5.29 The Mayor of London formally considered the proposal on 11 November 2024 following extensive pre-application discussions and issued a Stage 1 response. Revisions to the scheme were received post the GLA Stage 1 response. There have been ongoing discussions with the GLA relating to strategic transport, affordable housing, and energy.

5.30 The GLA summarise that the relevant London Plan policies applicable to the development relate to land use, housing, urban design, tall buildings, transport and sustainable development. The GLA response states that whilst the development proposal is supported in principle, the application does not currently comply with all these policies. The key strategic issues are summarised below:

Land Use Principles: Comprehensive mixed-use redevelopment of a largely vacant, brownfield site within an opportunity area is strongly supported by London Plan policies. The proposed land use mix is supported and would ensure a rich and vibrant balance of land uses. The quantum of office, commercial and cultural uses proposed in the illustrative masterplan is supported and is commensurate with the size and scale of the strategic development opportunity presented by this site. In view of the high degree of flexibility sought with regards to land use, the GLA consider that a minimum number of Class C3 homes will need to be secured in the S106 agreements. Further discussion also required to agree the maximum quantum of office/ commercial floorspace and student accommodation. The GLA would encourage ongoing engagement on the applicant’s affordable workspace and culture strategies.

Housing: 35% affordable housing is proposed site wide and across a range of market type tenures (i.e., sale, build to rent, student accommodation or co-living). Subject to confirmation that the tenure split is acceptable, the scheme could be eligible for the Fast Track Route on the basis that Lillie Bridge Depot forms part of the TfL portfolio agreement with the Mayor (and is therefore subject to the 35% threshold). The GLA advises the S106 agreements will need to secure relevant affordability thresholds and an Early-Stage Review.

Urban Design: The design-led approach undertaken by the applicant including engagement with the London Review Panel has been welcomed. The design, layout, landscaping, and public realm proposals are all strongly supported. An ambitious placemaking approach is proposed which is appropriate, given the scale of the opportunity area site. Within the detailed components of both applications, the quality of residential and student

accommodation is acceptable and the emerging architectural and materials quality of the detailed plots is supported.

Tall buildings: Tall buildings are proposed on the site and are in a location identified as suitable for tall buildings in the Local Plan, in line with Policy D9(b) of the London Plan. The massing approach is supported and is based on a logical and contextual distribution of height across the site with sufficient variation to aid the legibility of the masterplan and public realm proposals as a whole. The GLA states the proposed cluster of tall buildings around the existing Empress State building with a singular landmark 42-storey tower creates a well-defined composition with a clear visual hierarchy.

Heritage: The GLA declares that less than substantial harm would be caused to the significant number of designated heritage assets in the surrounding area, including Brompton Cemetery and St Cuthbert's Church. The harm is assessed to be at the middle of the range. In this case, it is considered that there are wide ranging public benefits associated with the proposed scheme which, if appropriately secured, would carry substantial weight, and could outweigh the harm caused.

Transport: A full package of multi-modal transport mitigation, to be delivered at various phases in the development build-out, will need to be secured as part of any permission. The Healthy Streets measures and stations works especially need to be discussed further and modified to ensure the development impacts are fully mitigated. The flexible nature of the outline application and phased build out will require an ongoing monitoring and management approach via a Transport Steering Group to be fully funded by the developer.

Energy and sustainable development: The proposed development would exceed the minimum on-site carbon reduction targets as set by London Plan Policy SI 2, although a carbon offset contribution to Net Zero would still be required. The proposed energy strategy requires some refinements to ensure it is compliant with London Plan policies and details have been provided to the applicant and the Council.

Other issues on urban greening, air quality and sustainable drainage are also, largely acceptable subject to minor clarifications and conditions to be applied if planning permission is granted.

- 5.31 The GLA have advise officers that they will not issue a formal response on the amendments and will conclude on all matters as part of the Stage 2 referral.
- 5.32 Should the Planning Committee resolve to grant planning permission, the application would need to be referred to the Mayor of London again (Stage 2), prior to the issue of any decision notice. The Mayor of London has a period of 14 days from the date of notification to consider the Council's resolution, before issuing a decision either to call in the application for the Mayor to act as the

local planning authority, or to allow the application to proceed to be determined locally.

Transport for London (TfL)

- 5.33 TfL comments followed the GLA Combined Stage 1 report (dated 11 November 2024). TfL's comments are summarised below

(1) TfL Land Use Development Control

District Line Load Anomaly: TfL note discrepancy where the projected 2041 "base minus" passenger load between West Brompton and Earl's Court was higher than the "base plus development" scenario. Additionally, platform congestion risks exist at West Brompton due to uneven passenger distribution caused by the station's layout. Mitigation - such as staffing to encourage full platform use - may be needed. TfL request confirmation that line loading assessments reflect accurate train frequencies, consistent with outputs elsewhere in the report.

(2) TfL Bus Network Planning

Bus Route 190: TfL welcomes the proposed provision of a first bus stop for route 190 within the new Lillie Road layover arrangements but advises the proposed layout would prevent buses from reaching the start stop from their stands. Requirement for the design to enable four stands.

Bus Corridor Capacity Methodology: Potential mitigation measures may be required if increased service levels are needed to meet future demand and journey time objectives.

Demand Breakdown by Route: TfL recommends disaggregating boarder/alighter data by individual bus routes, to clarify trip origins and destinations. TfL seeks transparency on the demand uplift between different forecast years and scenarios, requesting step-by-step modelling details.

(3) TfL Investment Planning

Peak Hour Definitions & Service Data: TfL seeks confirmation of the precise peak hour definitions used in analysis. Service frequency data is incomplete for some routes. A full station service summary table is requested.

Station Infrastructure Assessment: TfL states that only gateline capacity has been considered and that vertical circulation (e.g. staircases) should be analysed as well. TfL highlights outdated guidance have be assessed. TfL requests full calculations be used to determine gateline requirements.

West Brompton Station Changes: TfL states the lateral entrance lacks gates and uses validators only. Several proposed upgrades (e.g. ramp and additional openings) face potential challenges due to listed building status and engineering constraints. Extending the new footbridge to Platform 4 could reduce interchange congestion. TfL suggests this be examined during the detailed design development.

West Kensington Ticket Hall Design: TfL finds the layout unacceptable. TVMs should accommodate cash payments, which requires nearby consolidation facilities. The proposed removal of income-generating retail units to expand the public realm might be rejected. Redevelopment options

might however be explored to retain staff spaces and enhance street-level visibility.

(4) TfL Public Transport Service Planning

Phasing: TfL request clearer timelines on development phase completions and occupancy, to better assess transport network impacts over time.

NR Coordination: Since the project affects National Rail-owned infrastructure and West Brompton station, TfL assumes separate consultations are occurring with Network Rail. If not, this must be addressed urgently.

Rail Demand & Crowding Analysis: TfL seek precise trip volumes and crowding impact metrics across scenarios to validate assessment outcomes. Early calculations suggest increased standing density (approx. 0.6 passengers/m²) due to development, TfL recommends rechecking accuracy. Confirmation is requested on whether rail analysis includes London Overground and Southern services.

West Brompton Footbridge Extension: TfL questions why the proposed new footbridge cannot be extended to Platform 4 - whether due to space constraints - and suggests platform widening be considered as an option.

Lateral Entrance Gating: TfL is concerned that the ungated lateral entrance at West Brompton increases fare evasion risk. Suggest evaluating new gate line arrangements to improve flow and integrity.

Station Capacity and Developer Contributions: TfL notes that the station is already nearing operational limits and will face exacerbated strain post-development, potentially leading to regular peak-period closures. As the demand increase is development-driven, TfL suggests developer-led funding is appropriate given limited direct TfL support for such enhancements.

(5) PTSP Station Modelling

Gate line Standard Clarification: The static formula used for gate provision includes redundancy for new infrastructure; its application to existing infrastructure is indicative, not prescriptive. TfL agrees that development demand triggers additional gate requirements under this formula and recommends highlighting this.

Step-Free Access Capacity & Platform Demand: TfL notes omitted commentary on step-free access (SFA) capacity—modelling showed insufficient lift capacity even in the base case. Platform pressure is understated; development will worsen congestion both from direct passenger increases and increased through-traffic from branches.

Station Control Wording: TfL disputes the description “fails to cope”—the station managed 2019 demand with intermittent control. A revised phrasing such as “likely to require intermittent station control” is preferred.

RAG Status Misuse: TfL objects to the use of RAG scoring for mitigation designs, especially where LOS E is deemed acceptable despite substandard widths. Mitigation proposals must comply with standards for new and altered assets.

Mitigation Scope and Standards: TfL stresses that once mitigation is required due to development, it must meet LU’s full asset design standards. Partial upgrades are not acceptable.

Operational Limits: The modelling should more clearly state that additional development-induced demand renders the station inoperable without active crowd management.

Developer Funding Responsibility: TfL reiterates that station upgrades are required due solely to development impact. These must meet LU standards, and TfL sees no rationale for contributing funding toward enhancements driven by private schemes.

- 5.34 TfL have updated their position in terms of the impact assessment changes made for the Transport Assessment Addendum and consideration of the transport mitigation package relating to TfL's assets and operations. TfL expect on-going review/monitoring of the development over the 20 years build out and requested a Highway contingency fund to ensure that the impacts of the development can be mitigated in the future.
- 5.35 TfL have sought contributions towards Healthy Streets interventions on the TLRN in the vicinity of the site, and a tranche of healthy streets improvements secured by S278 works. Will also need to address local borough requirements in response to Active Travel Zone Assessments and Safety Inclusion Assessments. Contributions for interventions at West Brompton and West Kensington Stations in the form of capacity enhancements to gateline, ticket hall, stairways and walkways, and delivery of step-free access (SFA) are proposed. No contribution is sought by TfL to cater for the additional passenger demand on buses. Funding towards a temporary and subsequent new bus layover and associated facilities in the development on Lillie Road and bus stop upgrades to existing bus stops surrounding the site are proposed.
- 5.36 TfL have also sought contributions towards cycling, travel plans, a 'Transport Steering Group' or similar monitoring group, supervision of the Construction Logistics Plans/ Events Management Plan proposed to be secured by the borough in obligations contained a respective S106 Agreements and S278 Agreements.

Transport for London (Infrastructure)

- 5.37 Developer is in communication with Places for London engineers. Subject to the applicant fulfilling their obligations to London Underground and TfL, TfL's Infrastructure team has no objection.

Network Rail (NR)

- 5.38 The development rafts over the West London Line (WLL) and interfaces with West Brompton Station. A separate legal agreement is required with Network Rail. In addition, NR add the following:

Station Congestion: Existing congestion is acknowledged even without the development. Network Rail disputes elements of the Transport Assessment (TA) and its analysis. The development would exacerbate overcrowding, making the station potentially inoperable due to safety concerns, impacting both current users and future residents.

Mitigation and Developer Responsibilities: Developer must fully fund and deliver a compliant design that accommodates new demand, not merely restore baseline levels. Step-free access at West Brompton must be provided by the developer in line with Local Plan policy. Network Rail and TfL must agree on the final mitigation package before supporting the application.

Active Travel England (ATE)

- 5.39 Does not provide detailed comments on development proposals in Greater London at the current time, given role of Transport for London (TfL) in promoting and supporting active travel through the planning process.

Historic England

- 5.40 Historic England object on heritage grounds. They advise the Council to consider whether clear and convincing justification has been provided based on the harm identified and whether sufficient public benefits would outweigh the harm, as required by the NPPF. They consider the proposed development will result in considerable and wide-ranging less than substantial harm to the historic environment, noting in particular the heritage assets outlined below:

Brompton Cemetery (Grade I Registered Park and Garden):

The tallest buildings would intrude on key ceremonial views, disrupting the cemetery's formal composition and sense of seclusion. The prominence of the scheme in key views, would cause harm. The impact is considered "less-than-substantial" harm, but in the middle of that range for an asset of the highest significance.

St Cuthbert's Church (Grade I Listed) & Philbeach Conservation Area:

The massing and proximity of tall buildings would visually dominate the church and surrounding terraces, especially in winter. The harm to both the church and conservation area is considered "less-than-substantial," but above the middle of that range.

Nevern Square Conservation Area:

Dominant buildings would terminate key views and contrast sharply with Victorian rooflines, affecting the square's formal character. Harm is again "less-than-substantial," but just above the middle of the range.

Other Conservation Areas:

The scheme would disrupt consistent rooflines and historic streetscapes in conservation areas across LBHF and RBKC, such as Queen's Club Gardens, Olympia and Avonmore, Earl's Court Square, and Harrington Gardens. While some longer-distance views show minimal impact, the cumulative effect is considered harmful to a less than substantial degree.

Comparison to consented scheme:

Historic England consider the consented masterplan to be relevant in the consideration of this proposal, noting that the consented masterplan comprised a dense area of buildings which would have caused some harm to the significance of assets, however the extent of that harm would have

been more limited than currently proposed. They consider that the current scheme would, overall, greatly increase harm to nearby heritage assets, notably because of the increased heights and encroachment of bulkier buildings closer to the site's sensitive edges.

Policy Context

Historic England note that the development site is a major part of a London Opportunity Area which encourages optimisation of the sites potential and is allocated as an area of comprehensive redevelopment in both RBKC and LBHF. They note however that the RBKC adopted Local Plan allows for buildings at a lower height than currently proposed and Local Plan Policy in LBHF allows for some carefully placed tall buildings on the site subject to testing and sensitivity to context. They also note that the GLA's designation of the site as an opportunity area recognises the role of heritage in successful place making and the need for tall buildings to avoid harm.

The Greater London Archaeological Advisory Service (GLAAS)

- 5.41 GLAAS considers that the development could cause harm to archaeological remains. It recommends that a field evaluation is needed to determine appropriate mitigation. GLAAS recommends a two-stage archaeological condition, comprising the requirement to first carry out a full evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. GLAAS gives guidance that archaeological work should be made accessible and visible to the public through interpretation panels, community events, media coverage, and potential exhibitions in line with London Plan Policy HC1.

5.42 Health and Safety Executive (HSE)

Fire Safety: HSE unable to provide a comprehensive review of the outline component of the application, due to the lack of detailed fire safety information. Should permission be granted, HSE strongly recommend two conditions:

- A satisfactory fire statement must accompany any future reserved matters submission.
- HSE (via Planning Gateway One) must be formally consulted during the Local Planning Authority's consideration of any reserved matters applications.

Firefighting Infrastructure: HSE state a meeting was held in June 2023 with the design team to discuss fire safety considerations relating to the detailed component of the application.

- Buildings over 50m (WB03, WB04, WB05-T1) will incorporate firefighting shafts with wet risers and protected staircases.
- WB05-T2 will include a firefighting shaft with dry risers and a protected stair.

External Wall System Concerns: Comments relate to the proposed balcony materials for buildings in RBKC.

- EC05 and EC06 do not meet the required fire safety standard for high-rise buildings. Necessary design changes might influence visual and material aspects of the development.

Means of Escape: Support the proposed strategy to ensure independent escape routes from different uses within the shared podium of WB03 and WB04. Future evidence of compliance will however be needed.

Qualitative Design Review (QDR): A live QDR process is welcomed for the tall and complex buildings (WB03 and WB04). State the applicant must demonstrate code and performance-based compliance as the design evolves. Any non-compliance may necessitate design revisions affecting land use planning.

External Wall Angles & Fire Spread Risk: Internal angles between adjacent flats may heighten fire spread risk. The applicant proposes using 1m of 60-minute fire-resistant façade and, where needed, fire-rated fixed windows. HSE notes this mitigation measure and expects continued compliance assurance.

Sprinkler Provision in WB03: Although student accommodation identified, HSE state this use should be treated as non-residential Building Regulations purposes. WB03 will be fitted with a commercial-grade sprinkler system (OH3 spec). HSE remind the Applicant to address requirements from Approved Document B for buildings over 11m, referencing BS 9251 for residential design standards.

Fire Curtain in Reception: Proposed use of a drop-down fire curtain to protect escape routes during a reception fire is acknowledged. Alternate fire brigade access is available via rear corridors and parking areas.

Level 16 Plant Room in WB04: HSE notes partial compliance with fire separation standards. Since flats may have single direction escape routes, additional protected lobby measures may be required.

Cycle Store: Subdivision of cycle stores into smaller rooms to limit fuel load, especially from EVs and mobility devices is welcomed. Compliance to be evidenced in later stages.

Green Roof: Intent to include a green roof must consider the potential fire spread and maintain safe escape routes. HSE expects future compliance confirmation.

Environment Agency

- 5.43 No objection to the proposed development. The EA has provided advisory comments for the Applicant's consideration and recommend the inclusion of a condition (to secure implementation of the Flood Risk Assessment).

Thames Water

- 5.44 Thames Water request conditions be attached to any grant of planning permission. Proposed conditions relate to foul water infrastructure needs for the development and to meet surface water drainage capacities. Proposed development is located within 5m of a strategic water main and request conditions be added to ensure protection of their infrastructure during construction works, including the approval of a Piling Method Statement. Also require a condition relating to water network upgrades required to accommodate the additional water demands to serve the proposed development and an informative relating to sufficient capacity and water pressure. Thames Water have subsequently confirmed they have no objection relating to the combined wastewater network capacity, based on the updated information provided.

Sport England

- 5.45 Sport England advise that the existing provision of community sports facilities within the area is unlikely to accommodate the increased demand from up to 2,500 residential units (as well as older persons housing, co-living and student units) without exacerbating existing and/or predicted future deficiencies. Sport England consider new developments should contribute towards meeting the sport and physical activity demand through the provision of on-site facilities and/or providing additional capacity off-site. Strategies such as a Playing Pitch Strategy, Built Facility Strategy or up-to-date needs assessment should also be provided. Unclear if any sport facilities are proposed and whether those facilities would meet the sport and physical activity demand arising from the proposed development. The proposed development is unlikely to provide playing pitches/fields. Reference made to Active Design (May 2023) developed by Sport England, working with Active Travel England and the Office for Health Improvement and Disparities to guide new developments to create environments and help communities to get more active and improve the local population's health and wellbeing.
- 5.46 Sport England would support the Council seeking provision for sports facility provision through a S106 agreement. Refer to the Sport England's Sports Facilities Calculator to provide an indication of the likely demand that would be generated by a development for certain indoor sports facility types. Similarly, Sport England's Playing Pitch Calculator could help estimate the demand generated for playing pitch and ancillary provision.

Natural England

- 5.47 No response received.

The Gardens Trust (TGT)

- 5.48 Object on the grounds that the development will have a material impact on Brompton Cemetery. Although efforts have been made to ensure that views north-west, along the cemetery's main vista, will not be affected. TGT are disappointed that the new tall buildings will be prominent in the setting of the main walk along the western side of the site. TGT recommend the tallest buildings be located further to the north, reducing their visual impact from the cemetery.

London Historic Parks & Gardens Trust: London Parks & Gardens (LPG)

- 5.49 Object to the development proposals on grounds of the impact to Brompton Cemetery. Grounds of object relate to the harm to historically protected views; the threats to natural lighting and biodiversity; and the impacts associated with overcrowding and loss of tranquillity.

The Royal Parks (TRP)

- 5.50 TRP have highlighted their on-going responsibilities, charitable basis for generating funding, on-going costs associated with the management of the parks, and the management pressures relating to Brompton Cemetery, in terms of repair and maintenance requirements, and existing impacts on key listed assets and its setting from surrounding developments on existing listed buildings, conservation areas, monuments, colonnades and catacombs and western wall. TRP explain the existing pressures of running Brompton Cemetery which operates not only as a working cemetery but as a park, and the existing pressures associated with the high level of visitors which would increase in intensity generated by the proposed development.
- 5.51 TRP have undertaken an assessment of the proposed development and highlight the adverse visual effects of the proposals on Brompton Cemetery, the sensory effects associated with increased activity, and the effects on the existing peace and tranquillity from the likely increased use by visitors (pedestrians and cyclists). There would also be effects on ecology and biodiversity. TRP suggests a reduction in development heights and massing in order to achieve an acceptable scheme. TRP have requested that S106 contributions be secured to offset the harm and the impacts of the proposals on the setting and the significant assets in the cemetery, to address the increased footfalls

Theatres Trust (TT)

- 5.52 The TT advises that no initial engagement took place during preparation of the original cultural strategy, although acknowledge the strategy includes input from other relevant bodies. Recognise the recent benefits of the meanwhile uses (e.g. Underbelly, Lost Estate etc.) and support the development of permanent cultural uses on site and the new cultural provision should complement nearby venues (e.g. Olympia). The TT does not comment on the overall scale or design of the wider development proposals but requests further consultation as the plans are developed. The TT strongly encourages engagement with key stakeholders, including specialist theatre consultants, identification of an end-user to inform design requirements, consideration of essential theatre infrastructure—FOH space, rigging height, technical access and soundproofing and vibration controls for nearby residential units. Supplementary comments advise the Applicant has engage with TT to develop the revised Cultural Strategy. State the submitted report provides further detail including a more extensive assessment of the current and previous meanwhile theatre uses which have occurred at the site and give examples of comparable cultural projects elsewhere.

20th Century Society

- 5.53 No comments

National Air Traffic Services (NATS)

- 5.54 NATS are the UK's provider of air traffic control. No objection subject to conditions relating to external lighting of tall buildings, the erection of cranes and the submission of a radar mitigation strategy.

Heathrow Airport Limited

- 5.55 The proposed development has been examined from an aerodrome safeguarding perspective. No objection subject to conditions relating to the submission of a Radar Mitigation Scheme, a Crane Operation Plan and a Construction Management Strategy, including details relating to cranes and other tall construction equipment to be implemented for the duration of the construction period and to have notified the Civil Aviation Authority (CAA) and National Air Traffic Services (NATS). (Officer Comment: the Civil Aviation Authority (CAA) were consulted. No comments/response was received).

London Heliport Ltd.

- 5.56 Have referenced aerodrome safeguarding in respect to:

- **Physical Safeguarding:** No objection. Request conditions/informatives relating to the submission of details involving crane installation and other equipment; and
- **Technical Safeguarding:** This relates to communication, navigation and surveillance equipment (e.g. radio installations and meteorological equipment). At this stage no technical safeguarding requirements have been highlighted.

UK Power Networks

- 5.57 The proposed development is located within 6m of a substation. Proposals are required to meet minimum distance requirements relating to noise attenuation, anti-vibration, rights of access and 24-hour vehicular access arrangements. UK Power Networks are notifiable under the Party Wall etc. Act 1996. The developer is responsible for any costs associated with any appropriate measures required.

Cadent Gas Ltd

- 5.58 No objection in principle however, highlight need to prevent damage to assets or interference with rights. Request informative is added to ensure works, do not impact on Cadent's easements, or infringe on legal rights of access and/or restrictive covenants that exist.

NHS London Healthy Urban Development Unit (HUDU)

- 5.59 The NHS request the Council secure Section 106 contributions to ensure that infrastructure delivery aligns with proposed development and projected patient population growth. Obligations are sought to safeguard the quality and accessibility of healthcare for both existing and future residents. Seek obligations be secured for either by on-site provision or a financial contribution.

- 5.60 The NHS initially set out the necessary mitigation in response to the impact of the proposed development on primary care. HUDU have modelled the impact of the proposed development based on the maximum residential unit numbers (including student bedspaces) and modelled patient population growth. For the detailed element, HUDU state the primary care floorspace requirement would be 83 sqm. Demand for the detailed component could be met through the conversion of existing non-clinical floorspace in practices (records or storage rooms) and enhanced digital infrastructure (remote consultation facilities) in the existing primary care estate. Depending on the timescale and delivery of the detailed component, the ICB consider this space could be accommodated at either the North End or North Fulham practices. HUDU estimate a financial contribution of £417,950 would be necessary to mitigate the primary care infrastructure demands associated with the detailed element and to create the additional clinical capacity. Calculations towards the delivery of the whole scheme estimate the primary care floorspace demand would increase to 439 sqm. HUDU calculate a financial contribution of £3,694,721 would be required towards the delivery of the primary care infrastructure demands associated with the whole scheme.
- 5.61 HUDU have subsequently provided modelling and costings for Acute Care to demonstrate the extensive infrastructure demand associated with the proposed development.

Metropolitan Police – Crime Prevention Design Advisor

- 5.62 High level Secured by Design (SBD) principles were discussed with the Applicant design team in advance of the planning submission, including how these principles could be incorporated into the layout and design of this development. The SBD team have reviewed the Security Planning Report that forms part of the planning application. The SBD team advise that the high-level security strategy encompasses the principles of Crime Prevention through Environmental Design (CPTED), security best practice and the principles of the Secure by Design Scheme.
- 5.63 The SBD team made high level key recommendations in compliance with current guides - SBD Homes 2024 (residential) and SBD Commercial 2023. The SBD team highlight that as this is a large-scale project of eight phases, detailed SBD consultation will need to take place on a phase and plot-by-plot basis, to enable the latest security products and standards, as well as updated SBD guidance, to be incorporated in the security approach and ensure the safest possible environment going forward. For the detailed plots (WB03, WB04 and WB05), the SBD team request the Design Teams for each plot contact the South-West Designing out Crime Office so the latest SBD guidance can be incorporated into the final layout and design; commence the SBD accreditation process; and complete the appropriate SBD application forms. No formal response was received from the (Metropolitan Police) Counter Terrorism Security Advisor (CTSA).

West London Line Group

- 5.64 No formal response received (Officer Comment: Representation made via an individual resident comment).

Action on Disability (AoD)

- 5.65 Welcome the engagement between ECDC and Disabled residents. Add the current application satisfies the minimum London Plan Policy D7 requirements but does not yet represent best practice in accessibility or co-production.
- 5.66 Several important accessibility, inclusion, and co-production issues remain unresolved and require stronger commitments to meet the needs of Disabled people. LPAs should embed stronger commitments to inclusion through planning conditions and Section 106 obligations. The feedback provided reflects key priorities around inclusive design, accessible housing, emergency safety, and co-production engagement. AoD recommend the following:
- **Inclusive Co-production Framework:** Creation of a permanent Accessibility and Co-production Advisory Panel, including AoD members, Disabled residents, and ECDC's design partners, to review every design phase from planning to delivery including timelines for AoD's continued participation in design reviews, workshops, and Public Realm Inclusivity Panel meetings.
 - **Accessible Material Standards:** Ensure key documents (Design Codes, masterplan updates, exhibition boards) are published in Easy Read, large print, visually-impaired-friendly and screen-reader-friendly formats, using clear language and avoiding jargon, in line with Equality Act 2010 duties.
 - **Mobility and Sensory Testing:** On-site mock-ups and virtual walk-throughs including flat layouts and circulation spaces, tested by wheelchair users, deaf, blind, and neurodivergent people prior to design sign-off.
 - **Voice-Guided Navigation:** Introduction of a voice guidance system in key public spaces (e.g. toilets, main routes, entrances) to assist blind and visually impaired users.
 - **Accessible Toilets Network:** Public and community toilets must be located within short walking distance (around 100-150m), clearly signposted and digitally mapped. Shop or cafe toilets must be fully accessible, with automatic doors, adequate transfer space, and working emergency alarms.
 - **Fire Evacuation and Lift Access:** Clear information to identify evacuation lifts, and accessible information on safe exit routes, available in tactile, audio, and Easy Read formats for disabled residents.
 - **Accessible Toilets Design Standards:** Public, retail, and community toilet facilities should follow Changing Places or BS8300 standards, including hoists, adult-sized benches, and at least 2.5m x 2.5m circulation space.
 - **Sensory and Inclusive Design:** Public realm layouts should include calm, slower-paced areas with seating, clear sightlines, and soft landscaping to support comfort and orientation for everyone. Provide quiet, low-stimulation zones in open and green spaces (especially near community hubs and play areas), avoiding flashing or high-contrast lighting. Consider the diverse sensory and cognitive needs of residents and visitors, including neurodivergent, visually impaired, deaf, older, and younger people.
 - **Compliance and Best Practice Standards:** Adopt relevant inclusive design benchmarks such as BSI PAS 6463:2022 - Design for the Mind and BS 8300 to address issues of light pollution, glare, noise mitigation, and sensory accessibility.

- **Accessible Retail and Community Buildings:** Requirement for tenants and/or community operators to meet consistent accessibility standards and complete Disability Equality & Awareness training, ensuring inclusive service, evacuation support, and sensory-friendly environments. All community halls, shops, and entertainment venues should provide accessible toilets, seating areas and clear signage.

5.67 AoD recommend the following actions:

- Enhanced Wheelchair-Accessible Housing Target: increase the number of M4(3) wheelchair-accessible homes from 10% to 15%, and even distribution across both boroughs and tenures
- Wheelchair Charging Points facilities should not be limited to communal areas. Each adapted home must include at least one accessible charging point within the bedroom area
- Accessible Home Features: All residential units, particularly M4(2) and M4(3), should include accessible home features such as visual and vibrating doorbells, audible and visual fire alarms, easy-to-reach boilers, controls and intercoms, and clear tactile or braille labelling.
- Developers should ensure that building insurance policies do not exclude or restrict adaptations for disabled residents.
- Intercoms, alarms, and help points must include visual-text, vibration, and audio options for equal access by deaf, hard of hearing, and visually impaired residents.
- Automatic or power-assisted doors be standard at main entrances, communal areas, and public toilets to support independent access.
- All buildings include visible accessible evacuation plans, dual evacuation lifts, and compliance with Personal Emergency Escape Plans (“PEEPs”), monitored under building control. Evacuation lifts must have sufficient space for larger powered or bariatric wheelchairs and personal assistants, with both visual and audible alarms, tactile controls, and priority access for disabled residents during emergencies.
- Work jointly with TfL to ensure accessible lifts, tactile signage, and visual-text communication systems at West Kensington, Earl's Court, and West Brompton stations, including video/text functions at TfL help points.
- All car-free zones should include on-street drop-off bays and visitor Blue Badge parking within 50m of entrances.
- Establishment of an Inclusive Design Review Group, chaired jointly by the Council Access Officer or a Disabled People's Organisation (e.g. AoD), to review every Reserved Matters submission.
- Developer to provide all consultation materials in accessible formats and demonstrate active involvement of Disabled people in every design stage.

London Fire Brigade

5.68 No comments received in response to both notifications.

Ministry of Housing, Communities and Local Government (MHCLG)

5.69 No comments received in response to both notifications.

AMENITY GROUPS

- 5.70 A summary of the consultation responses received from the Amenity Groups is set out below.

Joint Amenity Group Response

- 5.71 A joint objection was received from local amenity societies in both boroughs: Hammersmith Society / Fulham Society / Lillie Road Residents Association (in LBHF) and Kensington Society and Earls Court Society (RBKC) and the London Forum. Together the above amenity groups oppose the development proposals in both the LBHF and RBKC applications, on the following grounds:

- **Housing:** Envisage high service charges / premium prices / question suitability of “affordable” homes / new homes outside the reach of local people who need housing.
- **Development too dense:** Include reference to abnormal density levels / buildings excessively tall / exceed heights in White City and the Empress State building.
- **Overshadowing and loss of daylight:** Adverse impacts on surrounding properties and within the site.
- **Adverse impacts on local heritage assets.**
- **Access to the site, transport, and connectivity:** Highlight access issues for disabled parking, taxis, visitors, deliveries, workmen etc.; Need for mitigation measures at existing stations, including installation of step-free access, especially at West Brompton, and overcrowding on the platforms, lifts and escalators at Earls Court and improve connectivity between the east-west underground services and the north-south West London Line, as an alternative to West Brompton; Impact on Lillie Bridge during construction and operation. Road use projections fail to recognise the surrounding roads are already at saturation. Essential road junction remedial work proposed does not deal with the peak construction period.
- **Social Infrastructure:** Development will require a significant S106 package for range of social infrastructure, such as for education and health.
- **Public open spaces:** Inadequate and will come too late. Uncertainty except for information provided in the detailed plots. Open spaces will be heavily shaded and subjected to strong winds. Detailed consent not sought at this stage for the key public open spaces. These spaces are a material consideration for deciding the acceptability of Phase 1 and should be made available from the start.
- **Table Park:** Only circa. 0.7 hectares in area (half the size of Parsons Green) and much of the public realm will be taken up by roads/walkways. Provision of the public space proposed is too little and too late and fails to meet RBKC Local Plan policy SA2, which requires a new public park of 2 hectares.
- **Green Space:** Required “urban greening factor” is split among different spaces, with soil depth of 6 inches or less. These spaces will support little variety of vegetation including trees; most will suffer wind exposure and shading. The amenity value to residents will be small.
- **Design Quality:** Considered disappointing. The use of different architects for each building has had the effect of reducing coherence across site. No

unifying features to bring a sense of place. Absence of visually appealing buildings, especially the proposed landmark towers.

- **Cultural spaces:** Are relatively small and divided. No anchor cultural institution, such as a museum or theatre company proposed. This is a missed opportunity.
- **Environmental Impacts:** Need more consideration. Concerns expressed about the impact on the local sewerage systems, especially Counters Creek. The water supply to the site is dependent on the relocation of the Lillie Bridge Depot which cannot be the 'base case' since this depot is critical to the functioning of the Tube network.
- **Adverse impacts – Construction Period:** The construction works will extend over a 19-year period. The impact will be severe and could overwhelm the area.

Hammersmith Society

5.72 Object to the proposed development on the following grounds:

- Excessive net density in the LBHF part of the development.
- The infrastructure will not be adequate to serve the development.
- The hyper-density will not create a liveable environment, especially as many of the amenities are not included in the first phase.
- Excessive heights proposed are a standard feature of overbuilt mixed-use developments
- The building heights of up to 42 storeys would far exceed the Empress State building adjacent and will be the highest in the borough. Heights in the White City Opportunity area are at 35 storeys.
- The Table Park is an over-designed park, and the open space is very limited and inadequate, to meet the demand expected, especially when considering the hyper-density of the proposed housing.
- The site deserves a landmark cultural venue and
- The development does not meet local needs.

Fulham Society

5.73 Endorse the joint amenity group response and object to the proposed development on the following grounds:

- Development is too dense.
- Proposed buildings are excessively high.
- The park is too small.
- Inadequate provision been made for road access and for necessary improvements to public transport.
- The development is totally unsympathetic to the local neighbourhood and would blight the community.
- Development is contrary to the Local Plan and urge the application be refused.

Lillie Road Residents Association

5.74 They highlight the adverse effects of the intended demolition of significant heritage elements on the site, including part of the Lillie Enclave, and the railway heritage of the Lillie Bridge Depot. The replacement developments will

overshadow the remaining conservation areas in both boroughs and cause permanent light pollution and alteration to the urban skyline. The nearby Grade I Listed Brompton Cemetery and the Grade II cluster of West Brompton station are most at risk together with impacts on the adjacent wetland and green corridor which will be comprehensively obliterated.

West Kensington Tenants Residents Association (Secretary)

5.75 Opposes the application for the following reasons:

- **Affordable housing:** The provision is not sufficient to meet the needs of the local communities and ensure key workers are retained. Residents unlikely to benefit from the proposed market housing stock proposed. Would further exacerbate inequality in the area.
- **Student accommodation:** Concerned about the number of student homes planned and how long before they are turned into permanent homes.
- **Overseas investors:** Proposed accommodation will be sold/rented mainly to overseas investors. Homes will not be occupied on a permanent basis throughout the year and will ultimately stay empty.
- **Impact on local communities, environment and sustainability:** Knock on cost will increase general social rents and lead to displacement.
- **Business spaces:** Transitory "workspaces" will mean a lack of more permanent job openings to members of the community.
- **Impact on local small businesses:** Possible rent increases, with upscale retailers and chains replacing traditional and independent businesses that serve the current population.
- **Construction works:** Length of development programme will impact the neighbouring communities, in terms of noise and dust pollution, as well as increasing traffic and congestion on the roads.
- **Lack of parking spaces:** Will have a knock-on effect on the availability of parking spaces for existing residents and could increase the cost of parking.
- **Green space:** The World Health Organisation (WHO) recommends a minimum of 9 square metres (96.9 sq.ft) of green space per person in urban areas. For circa 10,000 residents (average of 2.5 persons per unit) this would mean about 22 acres (or 9 hectares) of green space to meet this recommendation. The on-site provision falls well short of this requirement.
- **Table Park:** Will be overcrowded during peak times.
- **Impacts from high rise buildings:** Logistical challenges during the construction process, causing traffic disruption, plus noise, dust and vibration, affecting nearby residents and businesses for an extended period. Ongoing maintenance issues; higher service charges; contribute to social isolation / reduction in vibrancy of the area; wind tunnel effects at ground level, will create uncomfortable routes for pedestrians and outdoor spaces; contribute to the urban heat island effect, thus exacerbating issues related to climate change, energy use and air quality in an area; block natural sunlight to houses on the estate; cast overshadowing to the nearby streets and lower rise homes; have a high carbon footprint through heat loss in the winter and overheating in the summer, increasing energy consumption for heating and air conditioning; and solar glare for pedestrians, drivers and occupants of nearby buildings.

- **Impact on public transport, infrastructure and local services:** Adverse impacts associated with increased footfalls from the development and other cumulative schemes, including the Olympia's expansion, will overwhelm already congested Underground stations and bus services. Development will result in increased traffic congestion; and impact the existing underground stations and bus stops which are inadequate and lead to further congestion; increase demand for additional public services such as schools, nurseries and healthcare.
- **Design and character of the area:** Proposed development does not reflect the character, and the history of the surrounding area. Will reduce the amount of permeable surface area, contributing to surface runoff during rainfall, leading to localised flooding, especially in an area where drainage systems are already strained.

5.76 The Secretary for the West Kensington TRA has reiterated the objections during the second consultation. Highlights the 35% affordable housing target falls short of the LBHF Local Plan aspirations; the tall buildings will severely overshadow existing homes, reduce daylight/sunlight where some homes have benefitted from natural sunlight entering their homes for more than 20+ years, and harmful wind tunnel effects at street level; limited parking provision will displace demand into surrounding residential streets.

The Earls Court Society

5.77 Say that whilst the site provides a fantastic opportunity to reinvigorate the area and create much needed housing this must be done with heritage in mind, in the context of the existing environment and the capacity of local services. Advise the proposals are contrary to the RBKC Local Plan.

5.78 The objections are summarised under the following headings:

- **Density:** Despite being in an Opportunity Area, the development proposes an unsustainable density level in comparison to the surrounding area. A significant reduction in density should be proposed.
- **Impact on roads:** Unlike with the previous proposal, this car lite development relies heavily on delivery lorries, bikes and taxis that will cause congestion around the periphery of the site, on already heavily congested roads. Access routes are also long and complicated, adding to the congestion and are impractical for disabled people and families, and potentially dangerous at night. Introduction of a cycle lane on Warwick Road will add to the existing traffic and cause unacceptable increases in air pollution in the surrounding area. A full assessment of the main junctions and consideration of use of the North Access route need to be included.
- **Traffic Management Plan:** Construction vehicles for a period of up to 20 years, will rely solely on the surrounding already heavily congested roads. The existing network will not be able to cope with an additional 176 construction vehicles at peak per day. Question why the Northern access road isn't being used.

- **Impact on local transport:** No meaningful improvements or investment proposed to the Earls Court Station and the Warwick Rd tube entrance. Earls Court already dangerously overcrowded at peak hours and will not be able to cope with the extra demand from this development plus the developments at Olympia and the Tesco Tower. Full assessment of all the station capacities and safety required.
- **Utilities & Services:** Large scale developments must provide sufficient infrastructure to meet the needs of the new population. This proposal does not do this prioritising housing density over the well-being of current and future residents. Water, sewage and electricity will be put under enormous pressure by the development. Improvements to water supplies dependent on the relocation of the Lillie Bridge Depot, and surrounding area adversely affected by poor levels of water pressure. Relocation of this facility will however be complex and question if it goes ahead. The additional demands on the local electricity power supply will be unsupportable. The sewage system is already under enormous pressure in the area, with increased instances of surface flooding. No provision of any healthcare centre or GP practices. The assumption that existing facilities can absorb the extra demand generated by the development is another unrealistic statement. Neighbouring hospital already overwhelmed with excessive waiting times and getting GP appointments is increasingly difficult.
- **Building Heights:** Development should respect the RBKC Local Plan height limit of 73m. The proposed development is completely out of step with the surrounding area. Proposed heights far exceed even the tallest building in White City. Proposed clusters of high-rise towers will be out-of-scale and character with neighbouring conservation areas and result in unacceptable levels of amenity, in terms of loss of light and create a sense of overshadowing and enclosure.
- **Parking:** Development provides few parking spaces and needs to be increased to more realistic levels. Will impact the surroundings areas outside parking restricted hours. Extended parking restrictions will only impact on the amenity of existing residents.
- **Balance of Housing/Commercial provision:** A large proportion of floorspace is for commercial use. There is little evidence provided of the demand for office space. The ability to convert offices and hotels to residential use through permitted development rights and future planning applications represents a serious threat to the long-term sustainability of the area, adding to the density. Any consent must include robust conditions and legal agreements preventing both the conversion of commercial spaces to residential use and any increase in the total number of homes beyond the current proposal. Over-supply of commercial space, including many restaurants, cafes, shops and a large hotel, will likely further push the surrounding centres into decline.
- **Lack of connectivity and respect for heritage.** Development out of keeping with character of the surrounding area, and the lack of

impermeability is disappointing. No single permanent cultural facility to replace the Exhibition Centre is proposed. The general design is like most other modern developments. No iconic building is proposed to pay homage to the site's history. The green space does not meet guidelines as is below 2 hectares.

The Kensington Society

5.79 Object on similar grounds to the Earls Court Society relating to:

- the density of the proposed development
- the heights of the proposed buildings
- transport issues and
- the architecture of the development.

Earl's Court Area Action Group (ECAAG)

5.80 The ECAAG object on the following grounds:

- Overdevelopment.
- Proposed building heights disregard the local character, identity and context of Fulham and the wider area. Façade retention of existing houses and Public House not considered an appropriate response and existing meanwhile uses should be retained permanently.
- Object to the demolition of Empress Place and 2-26 Lillie Road based on historical and architectural characteristics.
- Need appropriate housing to meet the needs of people on the Council's housing waiting list and meet requirements for fire safety and evacuation of disabled or vulnerable residents.
- Reduce light levels for existing and new residents.
- Will impact the fauna and flora in Brompton Cemetery and West Brompton Wetlands.
- Will overwhelm the capacity of the local infrastructure in terms of water and sewage in an area which has flood risks already.
- Will put further demands on existing overburdened transport infrastructure.
- A permanent, significant, multi-purpose venue should be built in place of the 3 smaller cultural venues.
- The planned hotel, restaurants, bars etc. on the site will adversely affect North End market and the businesses in Lillie Road and beyond.
- No Olympic legacy included. Should provide inclusive health, social and economic benefits to the local and wider community. Propose a permanent venue for the British Volleyball Federation on the site, in association with the 2012 Games.
- Proposed development and surrounding scheme will increase pressure on Earl's Court, West Kensington underground and the tube/overground station at West Brompton. Funding will be required to upgrade stations and services to meet the demand.
- Proper site monitoring for air, water, sewage, noise, dust and vibration will be required. Highlight issues post demolition of the former Exhibition Centres. Consultation required with residents and independent panels.
- An Area Action Plan should be delivered by both boroughs.

Edwardes Square Scarsdale and Abingdon Association (ESSA)

5.81 The ESSA object on the following grounds:

- Adverse visual and wider impacts due to the proposed number of tall buildings.
- Cumulative effect of the proposal and surrounding developments will dominate the skyline, be overbearing and out of character within the conservation area.
- Development is too dense. Question if the 35% affordable housing will be truly affordable to low- and middle-income families.
- Adverse impacts on traffic and transportation, during both construction and operational stages.
- No significant public benefits that will address the loss of the former Earls Court Exhibition Centre.

Summary of individual representations received

- 5.82 In total, 376 individual representations have been received to the above consultations/publicity. 74 of these oppose the proposed development, 33 are neutral (neither objecting to or supporting) and 269 are in support.
- 5.83 Of the 376 representations received. 209 are from or on behalf of LBHF residents/groups (51 objections; 22 neutral and 136 in support).
- 5.84 122 are from or on behalf of residents in RBKC (22 objections; 11 neutral and 89 in support + 12 pro forma forms in support). A further 45 representations received are from residents/businesses in other London boroughs or the UK (1 objection and 44 in support).
- 5.85 In addition a further 83 proformas with written representations from person who attend the Earls Court Community Hub. In summary 73 in support, 2 object and 8 are neutral.

OBJECTIONS

- 5.86 The objections received are summarised below under the following categories:

Scale, Height & Density

- Massing and tall heights as defined on the parameter plans and detailed drawings produce an over-development scheme.
- Out of keeping and incompatible with surrounding low-rise character of West London.
- Substantial heights of the proposed towers are considered, too tall, imposing, excessive and out of proportion with the surrounding low-rise, historic neighbourhood.
- Introduction of 42-storey tower block would fundamentally alter the unique charm and atmosphere of the area and destroy the skyline.

- The density is too high and scale is unsustainable and incompatible with existing infrastructure and community character.
- The development is insensitive and would more than double the local population density.
- Already live in one of the most densely populated areas in London.
- Earl's Court Opportunity Area Plan recommends a maximum of 20 storeys.
- Massing is incompatible with the character of Fulham and Chelsea and disrupts the historic streetscape.
- Development is out of sync with the neighbourhood and resembles a "city within a city," disconnected from the surrounding neighbourhood and lacks permeability.
- Development is bad urban planning and environmental destruction.
- The Council has already approved the entirely inappropriate size and bulk of the Olympia redevelopment.
- A 42-storey building and other proposed high-rise tower blocks pose significant fire safety risk. Density could impede emergency services in the event of a fire, putting lives at risk.
- Prefer the original Earls Court Plan of approximately 12 years ago. Would have been completed. Major benefit was the connecting road from Star Road to Earl Court Station and better connectivity for pedestrians of the area.
- No building should be taller than the existing 31 storey Empress State Building.
- A scheme of more uniform height across the development up to a maximum of 15 storeys and the use of more traditional materials and style reflecting the nature of the areas historic neighbourhoods is preferred.

Design, Character & Heritage

- Proposed development fails to comply with Local Plan policies in design and heritage terms including DC1, DC2, DC3 and DC8. RBKC application also in excess of its standards and policies.
- Negative impact of the development can be seen in many of the images contained in Volume 2 of the ES 'Built Heritage Townscape Visual Impact Assessment' (VIA). Difficult to reconcile the description of the magnitude of the impact with the images provided.
- Architectural Incompatibility. Design described as inconsistent and soulless. Lacks imagination and detail. Considered unattractive, poorly conceived and bears no resemblance to the traditional Victorian and Edwardian architectural styles found in surrounding areas.
- Architectural style and materials proposed are insensitive and does not harmonise with the surrounding areas, many of which are conservation areas.
- The design of WB04 is not appropriate. Would become symbolic of this city's wealth divide. Should consider a skyscraper hotel in its place with lobbies and amenities open to the public.
- The Art Deco references are superficial.
- Replacement of the former historic Earl's Court Exhibition Centre with towering blocks of flats would only erase the area's cultural history in favour of commercial gain.

- No suggestion of any grand public art statement.
- Development disregards the local heritage and destroys the character and appearance of the area.
- Green and open space provision is inadequate for the projected population. Much provided in the form of rooftop gardens with minimal soil depth.
- The existing harmony of nearby crescents and the historic Brompton Cemetery would be impacted.
- Eardley Crescent off Lillie Road has been the subject to five Certificates of Immunity from Listing (COILs), which have not been publicly disclosed.
- Proposals lack a grand public art statement.
- Temporary art space on Warwick Road is a marketing gesture, and not a genuine cultural engagement.
- Entrance from West Brompton Station feels cluttered and closed off, with limited open space and does not "connect" with the existing lower-level buildings in the area.
- Use of local artist Duggie Fields' image, despite opposition to the scheme, is viewed as insensitive and exploitative.
- Statutorily and locally listed buildings on Lillie Road have no foundations and have been disturbed by past construction. Further disruption could be catastrophic for the retention of these buildings.
- Existing high wall off the West Kensington estate should be demolished and safer new route from North End Road to the site should be provided.
- Design Codes too strict.

Housing

- Insufficient provision of affordable housing to meet the needs of the local communities to ensure key workers are retained and reduce waiting list for social housing.
- Most of the proposed housing is poor quality and will not be truly affordable for low- or middle-income households.
- Area does not need more luxury and empty flats. Need communal spaces, arts centres, theatres and leisure centres.
- Will result in more social cleansing in the area. Social housing in the area is being displaced into private use.
- Far too much student accommodation proposed. More densely populated. How long before student accommodation is turned into more permanent homes.
- Both private and student accommodation will be sold/rented mainly to overseas investors, thus homes not occupied on a permanent basis throughout the year and will stay empty.
- Inadequate on-site car parking provision. Not realistic. How will the elderly or infirm cope without parking spaces.

Commercial

- Question the quantum of proposed office space and other commercial uses is excessive and unsustainable and will have an adverse impact on existing local services.
- Potential blight in Earl's Court, Kensington, North End Road market and Fulham Broadway.

- Imperial College or any University that needs more space would have been perfect on this site.
- Oppose further planning applications for meanwhile uses on the ECDC site because of their potential to further delay a comprehensive development coming forward.

Residential Amenity

- Proposed buildings will inevitably reduce the quality of daylight and cast long shadows.
- Proposals will result in negative impact on natural daylight, sunlight, blight sky views, contributing to overshadowing and a sense of enclosure to existing surrounding residents and the proposed residential buildings.
- Light studies do not reflect or correctly represent individual properties or room uses. Will increase reliance on artificial lighting.
- Proposed development will materially interfere with the right to light enjoyed by several properties under the Rights of Light Act.
- Development will also negatively affect the level of privacy currently enjoyed by residents in the area.
- Tall buildings will create unpleasant wind tunnels at ground level and claustrophobic living spaces that will have a negative mental effect on the local population.
- Lack of adequate wind or physics analysis. Such impacts will be hazardous to pedestrians, cyclists, and residents in the immediate vicinity.
- Development will have a negative effect on residents' quality of life.
- Will result in unacceptable noise levels and disruption.
- Expect night works that would exceed permitted hours and excessive noise levels breaching statutory thresholds as per the previous demolition works on the site.
- Air quality issues affecting the health and wellbeing of residents.
- Potential vibrations during construction or due to the building's height and materials.
- High-rise buildings may exacerbate urban heat issues.
- Construction works will generate incalculable levels of potentially toxic fall-out to the surrounding communities.
- The 3 performance venues should be limited to a maximum capacity of 1,000 each to protect residential amenity.
- Amenity of residents in Eardley Crescent and Philbeach Gardens and adjoining housing estates would be adversely impacted.

Disruption, Construction Impacts

- Surrounding roads are frequently congested and gridlocked; daily construction vehicles will worsen congestion and pose safety risks for residents/businesses
- A potential 20-year construction timeline will prolong dust, noise, reduce air quality and cause disruption in the area.
- Detailed transport impacts from construction works not calculated.
- Adding 176 construction vehicles daily at peak times will make living conditions dramatically worse.

Environmental Sustainability & Climate Resilience

- The development's environmental impact seems severely underestimated.
- The proposal fails to address long-term climate risks including stronger storms, flooding, and rising sea levels.
- The site includes areas within Flood Zone 3. Area served by a Victorian-era combined sewer system already at capacity and flooding happens already.
- Thames Water has widely reported infrastructure problems and acknowledged infrastructure strains. Residents report frequent low water pressure and sewage incidents.
- The Flood Risk Assessment lacks details.
- Surface water flooding risks along the District Line and western boundary.
- Drainage strategy relies heavily on engineered solutions (e.g. underground tanks prioritised over natural drainage or green infrastructure. More green spaces required.
- Groundwater impacts not assessed. No data provided on infiltration tank effects, contamination risks, or cumulative impacts.
- Air pollution risk assessment is deficient. Traffic estimates are unrealistic and long-term monitoring is absent.
- Lack of long-term pollution monitoring details and mitigation measures to be provided.
- Development should be condensed in scale to reduced density, increased natural drainage, and provide robust flood prevention measures.
- Development should be assessed against the government's UK Health Security Agency, Health Effects of Climate Change, 2023.

Transport, Traffic & Accessibility

- The area's current infrastructure is ill-equipped to support a development of this magnitude.
- Insufficient infrastructure to support approximately 12000 additional residents and employees of the commercial and retail uses. Proposed development will place enormous strain on transport infrastructure.
- Development will have an adverse impact on local underground and tube services plus buses and the existing road system.
- Earls Court Station/West Brompton already experiences dangerous levels of overcrowding during peak hours e.g. football days.
- No changes or upgrades proposed at Earls Court Station.
- A proper assessment of station capacity and binding commitments are required.
- TfL must commit to station refurbishments and provide more trains, buses, and wider platforms serving the District and Piccadilly lines.
- Not enough access roads provided to the development to address the proposed population.
- Not enough on-site parking is provided.
- The transport assessment is disconnected from daily realities faced by residents and the existing traffic problems.
- Significant traffic and congested pavements on Lillie Road and near West Brompton station.

- Strain from traffic congestion. Proposed development would worsen the situation. Traffic on North End Road is nearly always on standstill. Will increase queueing on North End Road and Warwick Road.
- Lillie Road already overburdened. Lillie Bridge to its junction with North End Road cannot support the daily vehicular access proposed to the development site.
- Banned left turn into Eardley Crescent should be retained.
- Object to the proposed 2-way cycle lane on Warwick Road, which would increase traffic congestion and vehicle pollution.
- Construction traffic will affect surrounding road arteries which are all already saturated.
- The Council need to protect the current residents parking because the entire development will spill over into the already crowded streets.

Infrastructure, Services & Public Realm

- Development will place strain on local public services.
- Local healthcare services are overstretched and overwhelmed. Existing local hospitals have long waiting times / GP and dentist appointments difficult to secure / The North End Medical Centre already overwhelmed by demand.
- A new medical community-based centre would be a very positive addition to the development.
- Provision of only two nurseries and no primary or secondary schools despite expected family growth.
- No health club, gym or outdoor sports area included.
- Request provision of at least one fully sized multi-use indoor sports hall (suitable for volleyball, basketball, netball, etc.), designed to proper sporting standards with suitable ceiling height and flooring together with support for Community & Leisure Spaces to support grassroots clubs.
- Lack of police and adequate crime prevention for current residents.
- The planned green open space areas, will be open 24 hours a day to the public, and have no security, Will be a magnet for anti-social behaviour.
- The Cascades feature and pedestrian routes will also become a security and safety problem with conflicts between pedestrians and cyclists. The Cascades should be pedestrian only.
- The Bioline decking over the West London Line is welcomed but contingent on third party agreement. To ensure delivery, agreement must be reached before determining this planning application.
- "Table Park" is about the same size as Earl's Court Square. Not large enough to serve the scale of development proposed. Should be designed as an actual park with wildflower spaces rather than having something 'sculptured'.
- Open and public space provision is inadequate and will be overshadowed by tall buildings.
- Lack of public access to rooftop terraces. Wider community excluded from access to outdoor amenities. Provision of public realm above ground level in the form of publicly accessible podiums, terraces and roof gardens must be committed to.

- Public toilets/changing facilities not adequately planned for a site of this scale.
- Development lacks an anchor institution e.g. Imperial College, a university satellite, or a major health centre.
- Conversion of existing empty office space to housing and creation of genuine public green space, with binding commitments to prevent future conversion back are required.
- Infrastructure improvements must be completed before construction works begins.

Community Impact & Consultation

- Proposal seeks to maximise profit by overdeveloping the area with dense, high-rise structures. Prioritises apartment blocks over long-term housing solutions like family homes.
- Many residents were unaware of the scale of the development, highlighting failures in communication and engagement.
- Too many unanswered questions and much proposed to be addressed once planning has been approved.
- While redevelopment is necessary, it must be done sustainably and in keeping with what the community wish to support.
- The current proposals would make the area unliveable for current and future residents.
- Revisions made following initial public consultations appear superficial and strategic, designed to bypass objections.
- The developers claim to be listening to the local community, but this is largely a lip service.
- The lack of transparency and meaningful engagement undermines trust in the planning process.
- Found the planning application documents overwhelming in their complexity and volume.
- Residents call for revised plans that respect the scale, design, and infrastructure of Earl's Court and its surrounding areas.
- Council urged to stand up for appropriate density and height, rather than approving what many see as an overly greedy and mistaken scheme.
- Council will be liable for compensation due to loss of property value, failure to provide adequate safeguards or risks claims for negligence caused by the redevelopment (damage to properties or interference with rights of light) or challenges under judicial review for failure to adequately assess the environmental and social impacts of the development.

NEUTRAL

5.87 Neutral comments primarily do not object to the development in principle, but raised the following concerns, questions and suggestions:

Scale, Housing & Affordability

- No major objection to the development overall, but concerns continue about excessive building heights across the site.
- Question the delivery of genuinely affordable homes.

- £1million+ homes will not be accessible to local families or key workers.
- Disproportionate pricing and absentee investors rather than homes for residents, will result in a hollowed-out community.
- Housing should target key workers who need to be in central London e.g. nurses, doctors, teachers, etc
- Housing provision should reflect the needs of the population, including families, disabled residents, and those on lower incomes.
- Question if affordable housing should be reduced, as the West Kensington estate is already large.
- Question raised about whether local schools can meet the educational standards expected by incoming residents, especially in high-value housing markets.
- Does the proposed development include the next phase of Lillie Square development?

▪ **Infrastructure, Transport & Local Impact**

- Inclusion of real, separated cycle lanes throughout the site to meet modern transport standards and safety expectations.
- Concerns about increased pressure on public transport, especially overcrowding at Earl's Court and West Brompton stations during peak hours.
- Calls for underground parking to prevent spillover into already congested residential streets, especially if properties are marketed as "car-free."
- Fears of traffic jams and delivery congestion, with doubts about whether new residents will support local businesses or rely on delivery apps.
- Suggestions to monitor and verify job creation claims—figures like 12,000 jobs need transparent backing and should exclude construction or indirect roles.
- Support for improved cycle infrastructure, including safe, quiet routes connecting key stations and avoiding dangerous junctions.
- Should create a tunnel to divert traffic off the Earls Court one way system (A3220).

Vision, Innovation & Opportunity

- The site is seen as a once-in-a-generation opportunity for London—not just to build housing, but to create something globally significant.
- Ensure the proposal delivers an innovation campus dedicated to sustainable urban living, bringing together global institutions, researchers, and entrepreneurs.
- The vision should include labs, meeting spaces, and collaborative hubs for climate tech, architecture, transport, and energy, integrated with the local community.
- Development could position London as a leader in urban sustainability, benefiting both the planet and the local economy.
- Frustration that housing targets and bureaucratic constraints may be limiting ambition. Calls for planning to think bigger and bolder.

Community, Retail & Public Realm

- Support for the mix of uses and public realm but concerns about retail quality—many fear the decline of North End Road and the rise of short-lease, low-quality shops.
- Several inquiries regarding where existing occupants of buildings to be demolished would be relocated.
- Suggestions to include a membership scheme offering discounts for locals on parking and events, fostering inclusion and loyalty.
- Requests for cultural venues to be scaled appropriately to avoid overwhelming the area or turning it into a tourist zone.
- Emphasis on maintaining vibrant, active public spaces that serve residents first, with careful attention to safety, lighting, and noise control.
- London Giants Volleyball Club, the current National Super League Champions and one of the fastest-growing volleyball clubs in the UK need a multi-use indoor sports hall (suitable for volleyball, basketball, netball, etc.), designed to proper sporting standards with suitable ceiling height and flooring to assist in the delivery and run grassroots, youth, and elite programmes across multiple boroughs, and engaging players from highly diverse communities.
- Hope that the development will be remembered not just for its buildings, but for its contribution to a better, more connected London.

SUPPORT

5.88 The representations received in support of the proposals are summarised below:

Housing, Regeneration & Economic Opportunity

- Earls Court was demolished over 8 years ago. The site has been dormant for many years; and is widely seen as a wasted opportunity in a borough facing a severe housing crisis.
- This site needs major redevelopment, and the plans are inclusive and forward thinking in response to the history of the area and in respect of open spaces, greenery and biodiversity, smart use of technology and renewable energy, ease of access and flow, mix of development types, mix of use types, and mix of tenants.
- The proposed development will revitalise and bring vibrancy to the area.
- Site will become a destination. Reference made to recent comparable developments including Kings Cross and Battersea.
- Will provide new places to shop and more spaces to relax and socialise.
- The proposal includes thousands of new homes, including affordable units, that would help meet the borough's annual affordable housing target and address in part London's housing crisis.
- Local workers and families struggle to find suitable housing in Hammersmith and Fulham; this development is perfectly situated to address that need.
- The mixed-use nature of the scheme will create up to 12,000 jobs opportunities, with a focus on clean and climate tech industries, offering vital opportunities for young people.
- Construction works will boost the local economy.

- The resulting growth in footfall, improved amenities, and support for the evening economy will contribute to the area's long-term prosperity.
- Would like some homes to be supported living for people who need assistance to live in our community.
- Supporters see the project as a model for modern urban regeneration, balancing residential, commercial, and cultural uses in a sustainable way.

Community, Culture & Public Realm

- The development is praised for its inclusive design, green spaces, cultural venues, cafes, and shops that will serve both residents and visitors.
- Applicant praised for the provision of the temporary Earl's Court Community Hub, which is already a valued community asset, offering classes, events, and is a welcoming space for all ages.
- ECDC praised for its engagement with local youth, through initiatives like Accelerate and the Youth Club design workshops, demonstrates the commitment to long-term community impact. Hub had a positive impact in respect of mental health and overall well-being.
- Pleased to see a permanent community hub will be provided as part of the proposals.
- Events like the BBC Earth Experience, London Wonderground Festival and ongoing Lost Theatre and "Come Alive!" Greatest Showman Circus Spectacular have not only reinvigorated the area but created employment opportunities and should be allowed to continue.
- Proposed arts, music and culture venues appear to be a key part of the plans.
- Suggested venues include a Caribbean community centre to reflect the borough's cultural diversity and ensuring supported living options for disabled and elderly residents.
- Make the neighbourhood safer, more attractive, and sustainable.

Infrastructure, Sustainability & Long-Term Vision

- The development is seen as highly sustainable, aims for net zero and carbon neutrality and increase in biodiversity by introducing over 1,000 trees to improve air quality.
- Welcome improvements to West Brompton Station. This is a listed station building subject to Listed Building Consent from RBKC. Supportive of the widening of staircases and walkways alongside Platforms 3 and 4 / the provision of step-free access for Platform 1 but opposes any loss/reduction of passenger shelter on Platform 4, loss of shrubbery on Platform 3 without replacement planting within the station site and the closure of the side entrance gate adjacent to Platform 3.
- Welcome the placement of pedestrians and cyclists at the forefront of transport infrastructure. The creation of dedicated cycle lanes will increase active travel and ensure vulnerable road users are protected.
- While construction disruption is acknowledged, the long-term benefits far outweigh temporary inconvenience.
- ECDC is commended for its transparency, responsiveness, and genuine engagement with residents throughout the planning process.

- Residents urge both Councils to approve the application, recognising its alignment with broader regeneration goals and its potential to transform Earl's Court into a thriving, inclusive destination.

6 ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

- 6.1 The application is subject to an Environmental Impact Assessment (EIA) and is accompanied by an Environmental Statement (ES).
- 6.2 The EIA was commissioned by the Applicant in support of the two Hybrid Planning Applications. The EIA has been conducted by Ramboll UK Limited ('Ramboll') who are the leading EIA consultant. The findings of the EIA are submitted within an Environmental Statement (ES), in line with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations'). The regulations require certain projects to be assessed to establish whether they would have any significant effects on the environment. The proposed scheme is not a Schedule 1 development as defined within the EIA Regulations. In this case, the proposed development falls under the definition of an 'Urban Development Project' set out within Schedule 2, Paragraph 10(b) of the EIA Regulations which, owing to its nature, scale and location, is likely to give rise to significant effects on the environment.
- 6.3 The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
- (a) To examine the environmental information
 - (b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, considering the examination referred to at (a) above, and where appropriate, their own supplementary examination
 - (c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - (d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
- The Local Planning Authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date.
- 6.4 Additional environmental information was requested following a review of the ES and has been published and consulted upon under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Evaluation of the ES

- 6.5 The ES has been independently reviewed on behalf of LBHF/RBKC by a third-party consultant: Waterman Infrastructure & Environment Ltd ('Waterman').
- 6.6 Waterman have examined the 'environmental information' and reviewed how the conclusions on the effects of the proposed development on the environment have been reached. These conclusions have been incorporated into the

relevant environmental sections of this report. Waterman submitted an Initial Review Report (IRR) to LBHF in November 2024 with a Final EIA Review of the July 2024 ES in July 2025. Waterman have also carried out a review of the '2025 ES Addendum' The Addendum Review report was submitted to the Council on 10 October 2025.

- 6.7 The ES informs on the results of the EIA for the proposed development in its entirety, regardless of the two separate hybrid planning applications being submitted. As this is a phased development, the ES has assessed the likely environmental effects at stages of the development programme. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the Local Planning Authority before it makes its decision. It considers the impacts arising from the demolition and construction phases, as well as the impacts arising from the completed and operational development and the cumulative stage. The EIA considers mitigation measures proposed to reduce or off-set likely adverse effects where possible.
- 6.8 As prescribed by Schedule 4 of the Regulations, the submitted ES includes: a description of the proposal; an outline of the main alternatives studies and an indication of the choices made, taking into account the environmental effects; a description of the aspects of the environment likely to be affected (the receptors); a description of the likely significant effects on the environment; and the mitigation measures. A non-technical summary is provided alongside comprehensive technical assessments. The ES including the 2025 ES Addendum comprises the following:
- **Volume I: Main Environmental Statement Report.** The main body of the ES, detailing the results of environmental investigations, effects arising and proposed mitigation measures. Includes assessment, text and figures.
 - **Volume II: Built Heritage, Townscape and Visual Assessment ('BHTVIA').** Reports the findings of the assessment of the effects on key and strategic views to and from the site.
 - **Volume III: Technical Appendices.** Comprises survey data, technical reports and background information supporting the assessments and conclusions given within the main ES.
 - **Non-Technical Summary.** Summarises the key findings of the ES in nontechnical language.
- 6.9 The ES (2025 ES Addendum) is divided into the following topic areas and cover different types of environmental effects identified by the Council through the scoping process:

Volume 1

- Introduction / EIA Process and Methodology / Alternatives and Design Evolution / Proposed Development Description / Demolition and Construction Description (Chapter 1 -5)
- Archaeology (Chapter 6)
- Socio Economics (Chapter 7)
- Human Health (Chapter 8)

- Transportation and Accessibility (Chapter 9)
- Air Quality (Chapter 10)
- Noise and Vibration (Chapter 11)
- Ecology (Chapter 12)
- Ground Conditions (contamination) (Chapter 13)
- Water Resources (Chapter 14)
- Daylight, sunlight, overshadowing, light pollution and solar glare (Chapter 15)
- Wind (Chapter 16)
- Climate Change (Chapter 17)
- Cumulative Effects / Summary of Additional Mitigation and Residual Effects (Chapters 18 and 19)

Volume 2

- Built Heritage (including appendices)
- Townscape and Visual (including appendices)

Volume 3: Technical Appendices

Plus, a **Non-Technical Summary**

6.10 The following topics were reviewed at the scoping stage and have been excluded or 'Scoped Out' of the ES.

- Telecommunications interference
- Aviation
- Major Accidents/Disasters
- Waste

6.11 Nevertheless, the following technical reports are included in the ES Volume 3 appendices for completeness: Telecommunications Impact Assessment; Aviation Impact Assessment; Demolition and Waste Management Plan and an Operational Waste Management Plan.

6.12 Part of the application has come forward in detailed form. The EIA assessment has considered the supporting documents and plans for this detailed component. The rest of the application is submitted in outline form, with all detailed matters reserved for future consideration. For this part of the EIA assessment, the control documents (i.e. the Development Specification, Parameter Plans, and the Design Codes) are taken into consideration. Some aspects of the outline component comprise a level of flexibility for the land uses coming forward. The EIA assessment has considered the worst-case scenario for each chapter / topic of the ES and is based on the maximum floorspace figures set out within the control documents. In some instances, this has included minimums as well as maximums. To assist in assessing the likely environmental impacts, an Illustrative Scheme has been developed. The Illustrative Scheme presented has been assessed in the EIA for wind microclimate, built heritage, townscape and visual assessments. An Indicative Landscape Design has also been prepared (UGF Illustrative Landscape

Scheme) to consider the commitments proposed to be made towards the urban greening factor and biodiversity net gain. The EIA has assessed the development based on vacant possession of Lillie Bridge Depot, with the socio-economic chapter based on the loss of employment at the site and the relocation of existing facilities to other sites. There is however no certainty on timescales of this land coming forward or alternative locations. In this case, the EIA states that reasonable assumptions have been made.

- 6.13 The EIA assessment has considered the potential environmental impacts during the demolition and construction work, alongside a completed development and other consented schemes, having regard to direct / indirect effects and cumulative impacts.
- 6.14 Assessments have been undertaken against the existing baseline (2024) and a defined future baseline. The existing meanwhile (temporary) uses have also been included. An alternative baseline and pre-existing baseline in relation to the 2013 outline permission and the previous Earls Court Exhibition Centres have also been taken into consideration for the daylight, sunlight and overshadowing analysis. Future baselines are included for some of the technical topics (transport and accessibility, air quality, noise and vibration and daylight, sunlight and overshadowing) with either specific dates (2031 and 2041) or worst-case years considered.
- 6.15 Regard has been given to temporal and spatial effects, given the anticipated phasing and the length of time expected to complete the development proposals (up to Q3 2043).
- 6.16 The proposed development is predicted to be delivered in eight phases over an estimated period of approximately 19 years. The development is split into the 'Early Phases' and 'All Phases' scenarios. The ES considers the potential scenario of a delay (post 2037) of the Later phases (contained within Phases 5-8), in terms of the Lillie Bridge Depot land coming forward for development, after the completion of the Early Phases (Phases 0-4).
- 6.17 The combined effects on identified sensitive receptors (existing or future) during demolition / construction or on completion of the development (Early and All Phases' scenarios) have been considered for each ES topic/chapter of the ES. The first residential occupiers could be on the site by 2030.
- 6.18 Significant environmental effects that might be experienced because of the combined effects of large-scale developments in the wider area, or more local, small-scale developments, where they introduce further sensitive receptors have been considered. A total of 17 'cumulative schemes' were identified in the ES based on a set criterion. These were agreed by the boroughs during the Scoping process for the assessment of the ES.
- 6.19 The ES gives details of the scale of the impact of the development for each topic (both beneficial and adverse). This is measured by negligible, minor, moderate and major impacts and beneficial, neutral or adverse effects. The scale of effects is determined using matrices and professional judgement.

- 6.20 The EIA has considered alternative scenarios, with a comparison of the environmental effects for each alternative. These include a 'do nothing' scenario. With the exception of the operational Lillie Bridge Depot land, most of the site is vacant or underutilised land. The do-nothing alternative would result in failure to deliver on a key strategic site in the Earl's Court and West Kensington Opportunity Area, resulting in no delivery of much needed housing, employment opportunities, public realm and open space, no improvements to connectivity and permeability, no creation of a key regeneration scheme and no enhancements or community benefits. This is not considered to be a viable or reasonable alternative option. Other scenarios considered in line with the EIA regulations include examination of alternative sites, alternative land uses, alternative design evolutions in terms of the height and massing layouts, alternative land use distribution (particularly within the outline component) and alternative open space and landscaping. In terms of design evolution, the initial concepts for the proposed development were worked up in 2020 and evolved over the next four years. This involved a design-led approach, analysing priorities, design development and finalisation of the masterplan.
- 6.21 Following submission of the original hybrid planning applications in July 2024, the proposal was amended, and the applicant has submitted an Environmental Statement (ES) Addendum in July 2025. The amended proposal and ES Addendum respond to post-submission consultation feedback from LBHF, RBKC, statutory consultees, other representations received and the local planning authorities' advisors. The ES Addendum assesses the likely significant environmental effects of the proposed amendments to the development.
- 6.22 As summarised above, the amended proposals include refinements to both the Detailed and Outline Components of the scheme. Key changes to the Detailed Component (Plots EC05, EC06, WB03, WB04, and WB05) include compliance with updated fire safety regulations (BS9991), resulting in minor increases to building footprints and heights, revised internal layouts, and changes to residential tenure and unit mix. The amendments to the detailed component have led to a net reduction of six residential units in LBHF. The overall minimum housing delivery target in LBHF has increased from 1,600 to 2,000 homes, indicating a broader uplift in residential provision across the outline component of the site.
- 6.23 Amendments to the Outline Component include adjustments to development parameters, site access (notably the removal of vehicular access from Aisgill Avenue), and updates to the Design Code to enhance townscape integration, biodiversity, and public realm quality. The submitted ES Addendum concludes that, while some additional or different environmental effects have been identified, these are not considered significant in EIA terms. The 2025 ES Addendum should be read alongside the original July 2024 ES to provide a comprehensive understanding of the environmental implications of the amended scheme.

Demolition and Construction

- 6.24 Demolition and construction activity will result in some temporary adverse interaction effects, for a range of sensitive receptors, including: existing and future residents within and in the vicinity of the development site, community facilities neighbouring the development, pedestrians, cyclists, road and public transport users.
- 6.25 The Applicant has submitted a 2025 ES Addendum to reflect amendments to the proposed development following the consultation feedback. The demolition and construction programme remains largely unchanged, though key access routing and earthworks calculations have been updated. The ES Addendum confirms that while some environmental effects have been revised, no new or materially different significant effects have been identified compared to the original ES except for the following:
- Early Phases: Temporary significant adverse effects from road traffic noise at receptors closest to Empress Place access road.
 - All Phases: Temporary significant adverse effects from road traffic noise at receptors closest to Empress Place access road and Beaumont Avenue.

Completed development (i.e. All Phases)

- 6.26 The 2024 ES concludes that the completed development of the All Phases of the scheme would result in a range of significant beneficial environmental and socio-economic effects, particularly in relation to housing delivery (up to 2,650 homes), employment generation (minimum 8,460 jobs), public realm and open space provision (6.03 ha), biodiversity net gain (98.97%), and flood risk reduction through sustainable drainage. The development would target being air quality neutral, climate resilient, and suitable for residential use, with no significant adverse effects on human health, ecology, water resources, or built heritage. While some adverse effects are identified—most notably in relation to daylight, sunlight, and overshadowing impacts affecting a small number of surrounding properties, and residual transport impacts such as severance and driver delay—these are considered acceptable in the urban context and are mitigated through embedded design and planning conditions/obligations. The townscape and visual impact assessment identifies significant improvements to permeability, connectivity, and character, with adverse effects limited to a small number of views. Overall, the completed development is considered to deliver substantial environmental and socio-economic benefits and aligns with the strategic planning objectives of the borough.
- 6.27 The 2025 ES Addendum confirms that most of the completed development effects identified in the July 2024 ES remain valid; however, several refinements have been made. Notably, the minimum housing delivery has increased to 3,050 homes, including an uplift of 400 homes within LBHF, while employment figures have slightly decreased. Additional assessments identified new significant beneficial effects on housing-related health outcomes for vulnerable groups, and minor adverse effects related to air quality, noise, and vibration. Updated transport modelling introduced further mitigation measures, though some residual adverse effects remain on specific road links. Daylight and sunlight assessments were refined, resulting in a reduction in the number of

properties experiencing significant adverse effects, though a small number still fall below target criteria. Overall, while the completed development scenario has evolved, the ES Addendum concludes that no materially different or additional significant environmental effects arise beyond those already assessed in the original ES.

Archaeology

6.28 The site is not located within an Archaeological Priority Area. Geoarchaeological investigations identify potential for paleoenvironmental remains but remains on the site would have been impacted by previous uses on the site. The ES sets out the potential impacts of the proposed development during demolition and construction works and the effects for the early and all phase development. The potential impacts on the infrastructure, enabling, demolition and construction work to the potential buried heritage assets on the site have been considered. The adverse effects on buried heritage assets for the proposed development are of low to medium heritage significance, associated with the existing ground conditions and phase of the development. Impacts identified would be offset and reduced to an acceptable level by the requirement of a planning condition seeking an archaeological Written Scheme of Investigation (WSI), approved in advance by the LPA and in consultation with GLAAS (the Council's archaeological advisor). The programme of archaeological investigation is anticipated to comprise archaeological monitoring of geotechnical pits dug for engineering purposes, evaluation of trenches/pits and watching briefs during earth works. Building recording of the former industrial and leisure heritage uses and of the remains of a WW2 bunker in the north-western part of the site would be secured if required by Historic England. Overall, the demolition and construction phases of the proposed development would not give rise to significant residual effects on buried heritage assets with mitigation and offsetting measures proposed.

6.29 The archaeology assessment in the 2025 ES Addendum confirms that the conclusions of the July 2024 ES remain valid. While two additional archaeological investigations were added to the Greater London Historic Environment Record (GLHER), these identified only post-medieval remains of low heritage significance and did not alter the assessment of archaeological potential on-site. The Addendum considered the amendments to building footprints, excavation depths, and increased excavation volumes, but concluded that these changes would not result in any additional or different archaeological effects. No new mitigation or enhancement measures are required, and no significant archaeological impacts are anticipated from either the Early or All Phases of the Amended Proposed Development.

Socio-Economics

6.30 This ES chapter sets out the following considerations:

- LBHF part of the EC site falls within the 10-20% most deprived areas in England.
- LBHF has met their housing delivery targets in half of the previous 10 years.

- There are 123 nurseries and formal childcare settings south of the A315 in the two boroughs.
- There are 30 primary schools south of the A315 (16 in LBHF and 14 in RBKC).
- There are 1,300 surplus places at the primary schools in LBHF (27% surplus). This is greater than the 390 surplus places at the primary schools in RBKC (12 % surplus).
- Secondary schools have been considered at borough-wide level, as older children tend to travel further than primary age pupils to attend school. There are an estimated 670 surplus secondary school places in LBHF (8% surplus) which is greater than the 70 surplus places in RBKC's secondary schools (1% surplus).
- LBHF predicts that the surplus capacity across the borough's secondary schools is going to increase to 18% by 2031, whilst RBKC anticipate the need to expand existing secondary schools to meet demand.
- 16 GP practices are located within 1 km of the site boundary (seven in LBHF and nine in RBKC). Collectively the ES states that the existing practices are operating below the benchmark provision therefore, suggesting a surplus capacity is available.
- Within 1 km of the site boundary, there are 25 sports facilities, including gyms which offer low-cost memberships and 22 community facilities including two libraries and nine community centres/halls.
- The site is in an area identified as deficient in access to open space and limited existing play space is identified. Most of the existing provision is in LBHF.

6.31 The 2025 ES Addendum confirms that the socio-economic effects identified in the July 2024 ES remain valid, with some updates reflecting changes to housing delivery, employment floorspace, and baseline data. The minimum housing delivery has increased by 400 homes within LBHF (to 2,000 homes), contributing 14.2% towards the borough's London Plan target (up from 11.7%). While the minimum employment generation has decreased due to reduced office and R&D floorspace, the Amended Proposed Development is still expected to deliver approximately 4,205 net additional jobs at the borough level and 2,070 across London. Updated baseline data shows increased surplus capacity in local primary and secondary schools and capacity in primary healthcare. Local expenditure estimates have been revised slightly, with the Early Phases expected to generate £20 million annually in household spending and the All Phases £36.5 million. Overall, the socio-economic impacts remain positive and significant, and no new or materially different effects have been identified.

Early Phases

6.32 Temporary uses are proposed to continue during the Early Phases, operating alongside demolition and construction works for Phases 1-4. It is estimated that the Early and All phases scenario would generate an average of 1,150 construction jobs over the duration of the demolition and construction periods. Employment and training initiatives would be secured through a Section 106 Agreement and would seek to create opportunities for local people. Spending by construction workers and supply chain effects would have beneficial effects.

- 6.33 The Early Phases are anticipated to deliver a minimum of 1,664 homes (624 in LBHF) and 696 PBSA bed spaces. This would result in a significant beneficial effect. Alongside other forms of housing and living products proposed (including Co-Living and Older Person Units) the Early Phases could accommodate an estimated population of 7,206 residents, including 325 early years children, 258 of primary school age and 149 secondary school age.
- 6.34 The existing temporary Earls Court Community Hub would be replaced by a new permanent Community Hub, proposed in a building plot WB05 once complete. This facility could include nursery provision to meet demand, alongside new leisure floorspace. Overall, the effects on nursery, primary and secondary school places in the borough are unlikely to be significantly adverse.
- 6.35 The ES states the Early Phases will result in the need for the equivalent of four GPs. The ES assesses that existing surgeries could take some of this surplus. The ES acknowledges that additional mitigation in the form of financial contributions towards education and primary healthcare capacity could be secured through the Section 106 Agreement if deemed necessary.
- 6.36 Play space is proposed within the Detailed Component Plots and for the Outline Development Zones. The Applicant has committed to delivering 10 m2 play space per child. These effects are therefore considered beneficial. The Early Phases would also deliver new public open space in an area of open space deficiency which would have a significant beneficial effect.
- 6.37 The Early Phases are expected to accommodate a minimum of 5,635 jobs on-site which would result in a net increase of 4,860 jobs in LBHF and RBKC (a significant beneficial effect at local and borough level) and a net increase of 2,400 jobs in London (a beneficial effect at regional Level). The new residential population, students and employees on the site would have a beneficial effect on the local economy through increased spending. This is currently estimated to be in the region of £22 million for annual household spending, £5.5 million for annual student spending and £15 million for annual employee spending (based on 4,860 net additional jobs in the boroughs). This will have a significant beneficial effect. Overall, it is considered that the completed Early Phases would result in overwhelmingly beneficial socio-economic effects, with significant effects in respect of housing delivery, employment generation and open space delivery.
- 6.38 The 2025 ES Addendum confirms that the Early Phases of the Amended Proposed Development remain broadly consistent with the July 2024 ES, with some refinements. A new meanwhile use has been introduced on-site, but it utilises existing infrastructure and does not materially affect baseline conditions. The Early Phases still aim to deliver a minimum of 1,674 homes (624 in LBHF), including 696 purpose-built student accommodation (PBSA) bedspaces, with no change from the original ES.
- 6.39 Employment generation has been revised downward, with approximately 4,590 full-time equivalent (FTE) jobs expected on-site (down from 5,635), resulting in

3,960 net additional jobs at the borough level and 1,950 across London. Community infrastructure provision remains largely unchanged, with a community hub and nursery proposed within 1,084–2,984 m² of social infrastructure floorspace. Updated baseline data confirms increased surplus capacity in local primary (27%) and secondary (8%) schools, and the closest GP practice remains significantly below benchmark patient levels, indicating capacity. Play space provision has been slightly reduced from 828 m² to 765 m², but the commitment to 10 m² per child remains. Local economic benefits remain strong, with estimated annual spending of £20 million by households, £5.5 million by students, and £12 million by employees. Overall, the Early Phases continue to deliver substantial socio-economic benefits, with no new or materially different significant effects identified.

Completed Development (i.e. All Phases)

- 6.40 No significant adverse effects have been predicted. A minor adverse effect has been identified in the latter phases in relation to the displacement of LBD, Ashfield House and 175-177 North End Road from the site. The uses of LBD and Ashfield House would however be relocated to other parts of TfL operational sites. The occupants at 175-177 North End Road are on short term leases. It is anticipated that the businesses would relocate, and employees would either relocate with the business or would move to a similar type of job within the labour market.

- 6.41 All phases development is expected to deliver between 2,000 – 2,500 new homes and between 696 – 1,500 PBSA bed spaces making a sizable contribution towards the housing supply in LBHF. The effect would be significant beneficial. The new homes, together with PBSA, Co-Living units and Older Persons Housing units would accommodate an estimated population of 10,785 residents, including 497 early years children, 381 primary age children and 217 secondary age children.

- 6.42 The All phases development would provide community/social infrastructure floorspace which would include nursery provision to help meet demand. Therefore, the effect on nurseries would be beneficial. A surplus capacity in local primary schools has been identified. For this reason, the scale of demand for primary school places generated by the completed development is unlikely to result in a significant adverse effect. There is also some surplus capacity in borough secondary schools, the majority of which are in LBHF. The demand for secondary school places generated by the development is also unlikely to result in a significant adverse effect.

- 6.43 The completed development is estimated to require the need for the equivalent of six GPs; however, the ES states that existing surgeries could accommodate some of this need.

- 6.44 A minor adverse effect has been identified regarding secondary education and primary healthcare. Financial contributions towards additional secondary education and primary healthcare capacity could be secured through the S106 if deemed necessary.

- 6.45 The All-Phases development plans to deliver new community/social infrastructure floorspace and new leisure floorspace across a series of development plots. Play space would be provided within the Detailed Component Plots and for the Outline Development Zones. 10 m² of play space would be provided per child.
- 6.46 The All-Phases development is expected to accommodate a minimum of 8,460 jobs on-site which would result in a net increase of 6,960 jobs in LBHF and RBKC (a beneficial effect at local and borough levels) and a net increase of 3,430 jobs in London (a beneficial effect at regional level).
- 6.47 The new residential population, students and employees would have a beneficial effect on the local economy through increased spending. This is estimated to increase to approximately £35 million based on annual household spending, £5.5 million for annual student spending and £21 million for annual employee spending (based on 6,960 net additional jobs in the boroughs). This is considered to have a significant beneficial effect.
- 6.48 The 2025 ES Addendum confirms that the All Phases completed development will deliver a minimum of 3,050 new homes, including 2,000 within LBHF, representing an uplift of 400 homes compared to the 2024 ES. The provision of 696 purpose-built student accommodation (PBSA) bedspaces remains unchanged, and the scenarios for co-living and older persons housing are consistent with the original assessment. The total of community and social infrastructure floorspace has been slightly revised to between 1,084 and 3,734 m² GEA, which includes provision for a nursery. This adjustment is not considered material and does not alter the assessment conclusions. Updated baseline data shows increased surplus capacity in local schools, with 27% at primary level and 8% at secondary level, and the projected child yield remains within this capacity. Primary healthcare provision also remains sufficient, with the average number of patients per GP in the area rising slightly to 1,890—still below the London average—and the nearest GP practice, North Fulham Surgery still operating below benchmark levels. The commitment to provide 10 m² of play space per child remains unchanged, ensuring compliance with GLA standards. Employment generation has been revised down from 8,460 to 5,265 full-time equivalent jobs, resulting in 4,205 net additional jobs at the borough level and 2,070 across London. Despite this reduction, the employment impact remains significant beneficial. The completed development is expected to generate approximately £36.5 million in annual household spending, £5.5 million in student spending, and £13 million in employee spending, maintaining a high magnitude of economic benefit consistent with the 2024 ES.

Human Health

- 6.49 The ES considers the impact of the proposed development on the Lower Super Output Areas (LSOAs). The LSOAs in LBHF wards are in the most deprived 20% in England.
- 6.50 The demolition and construction effects in Early Phases are concluded to give rise to temporary adverse, significant and not significant, effects in respect of Air Quality, Noise and Vibration, Climate Change Mitigation and Adaptation and

Transport Modes, Access and Connections (for the vulnerable groups population); and temporary adverse but not significant effects in respect of Transport Modes, Access and Connections (for the general population); alongside temporary beneficial, significant and less significant effects like Community Identity, Culture, Resilience and Influence and Social Participation, Interaction and Support (for both, general and vulnerable groups population).

- 6.51 For the All Phases completed development permanent adverse, but not significant effects are identified with respect to Air Quality, Noise and Vibration and Health and Social Care (for the vulnerable group population) and with respect to Health and Social care (for the general population); alongside several permanent beneficial but not significant effects with respect to Climate Change Mitigation and Adaptation (Local Level), Diet and Nutrition and Community Safety (for the vulnerable group population); and Diet and Nutrition, Community Safety, Open Space, Leisure and Play, Community Identity, Culture, Resilience and Influence, Social Participation, Interaction and Support, Transport Modes, Access and Connections (for the general population). Permanent beneficial and significant effects are identified with respect to Climate Change Mitigation and Adaptation (Site Level), Diet and Nutrition, Open Space, Leisure and Play, Community Identity, Culture, Resilience and Influence, Social Participation, Interaction and Support, Transport Modes, Access and Connections (for the vulnerable group population) and with respect to Transport Modes, Access and Connections (for the general population).

- 6.52 The 2025 ES Addendum reaffirms the conclusions of the July 2024 ES regarding human health, while providing additional detail and updated assessments in response to post-submission consultation. During the demolition and construction phases, the effects on both the general and vulnerable populations are assessed as not significant. The impacts from air quality, noise and vibration, and disruption to community infrastructure are characterised as temporary, short- to medium-term, and moderate adverse at the site and within a 250-metre radius of the site. The 2025 Addendum adds further detail, particularly around the loss of meanwhile uses (e.g. community hubs and cultural venues), which may affect vulnerable groups. These effects are expected to be localised and reversible, with mitigation through future community provision.

- 6.53 For the All Phases completed development stage, the Addendum identifies significant beneficial effects for vulnerable populations. The delivery of high-quality, affordable and accessible housing, alongside inclusive public spaces, cultural venues and community facilities is expected to improve physical and mental health outcomes. These benefits are assessed as permanent, long-term, direct and major beneficial for vulnerable groups, reflecting the strong link between housing quality, affordability, and health equity.

- 6.54 In terms of air quality, the completed development is expected to result in emissions from road traffic and emergency carbon based HVO generators. While these contribute to exceedances of World Health Organization (WHO) air quality guideline levels, the impacts are considered minor to moderate adverse for both the general and vulnerable populations. The Addendum confirms that

all exposures would remain below national air quality objectives and that mitigation measures, including planning conditions aligned with WHO air quality guideline values for the air pollutants Nitrogen Dioxide (NO₂) and Particulates (PM₁₀, PM_{2.5}), would be secured.

- 6.55 In summary, while the July 2024 ES established a baseline, the 2025 Addendum assessment provides a more detailed analysis of how both construction impacts and the completed development benefits will affect vulnerable populations. The overall conclusion is that the Amended Proposed Development will deliver long-term health benefits for the general population, despite temporary, adverse effects during demolition and construction, including those related to air quality.

Transport and Accessibility

- 6.56 The site has a public transport accessibility level ('PTAL') scores between 2 and 3 adjacent to the Lillie Bridge Depot; 4 and 5 on North End Road and around West Kensington Station; and 6b and 6a across the eastern and southern areas of the site around Earl's Court Station and West Brompton Station. The site benefits from access to three London Underground Stations directly adjacent to the boundary. These stations provide access to the District Line, with Earl's Court Station also providing access to the Piccadilly Line. In addition, London Overground and National Rail services are accessible from West Brompton Station. The key transport connections around the edges of the site can be reached within five minutes.
- 6.57 A review of off-street parking areas in the study area has identified that whilst some parking locations allow users to book in advance, not all guaranteed spaces are available on the day. A parking survey of the local area identified a total of 904 on-street, car parking spaces in the survey area.
- 6.58 Strategic transport modelling has fed into a Transport Assessment, prepared in accordance with TfL guidelines. Consideration was given to an Early Phases and All Phases demolition and construction assessment, Early Phases completed development assessment, and the All Phases completed development assessment.
- 6.59 Consideration has been given to public transport demand and capacity. Multi-modal trip generation calculations made based on the worst-case interpretation of the Proposed Development's area schedule for both the Early Phases and the All Phases. Transport surveys were collected in March 2022. They covered a series of locations around the site in the borough and RBKC. They covered all key roads, including but not limited to Warwick Road, Old Brompton Road, Lillie Road, North End Road, A4 West Cromwell Road, Earls Court Road, as well as side streets and further junction. Department for Transport ('DfT') count information was also used to validate the 2022 modelled highway data. A similar validation of the 2022 modelled highway data was completed using recently available 2023 DfT counts. Cumulative schemes have been incorporated within the modelling process.

- 6.60 Strategies to manage the impacts of the Proposed Development and where possible to reduce the impacts of the Proposed Development on the surrounding transport network are also included. Management and control measures proposed consist of the adoption and implementation of a Framework Travel Plan ('FTP'), Framework Delivery and Servicing Plan ('FDSP'), Framework Parking Design and Management Plan ('FPDMP') and Construction Traffic Logistics Plan ('CTLP').
- 6.61 Consideration has been given to the demolition and construction effects for the Early and All Phases development. The demolition and construction traffic has been assessed for the future year of 2028, and future modelled baseline of 2031, at which time peak demolition and construction heavy duty vehicle ('HDV') flows are anticipated. The estimated trip generation is 175 daily vehicle movements (arrivals and departures), with a peak workforce of approximately 1,000 workers per day. The impacts were assessed as temporary, short to medium-term, and ranged from minor to moderate adverse effects, particularly on sensitive links such as North End Road and Lillie Road. Mitigation measures included a Construction Traffic Logistics Plan (CTLP), travel demand management strategies, and ongoing coordination with stakeholders. During this period there are likely to be temporary effects in relation to pedestrian severance, driver delay, pedestrian and cyclist delay and pedestrian and cyclist amenity due to the changes in traffic on the highway network. There may also be temporary diversions required to walking and cycling routes during the demolition and construction stage; however, all existing access would be retained. For the All Phases completed Development the 2041 has been utilised as the future year and appropriate TfL modelling outputs have been agreed with TfL and during the EIA scoping process.
- 6.62 The CTLP and CEMP are set out within ES Chapter 5: Demolition and Construction. A framework CMP and framework CTLP have been submitted in support of this hybrid application, but detailed ones would need to come forward at the RMA stage to address any specific impacts arising from those plots. The CEMP and CTLP (alongside DEMP and DTLP) would outline the measures required to avoid and reduce the potential impacts from demolition and construction traffic and would be secured by conditions.
- 6.63 Potential additional mitigation measures have been identified in the ES, targeted at pedestrians, cyclists and public transport users. These would be provided alongside the creation of a people first public realm that prioritises active travel across the Early Phases, creation of a new network of pedestrian and cycle friendly streets and public realm; provision and access to a minimum number of car parking spaces; the delivery of cycle parking in accordance with London Plan requirements; and implementation of a FTP, FDSP and FPDMP.
- 6.64 Additional mitigation is expected to be delivered for the Early and All Phases scenarios, through a package of financial contributions, to offset the impact of the development, secured by the S106 Agreement or planning condition (if required). In the Early Phases these are proposed:

- Widening of the crossing on the western side of the A4 West Cromwell Road/Warwick Road junction.
- Widening of the crossings and incorporating into the traffic signal staging of the northern and western arm crossings at the Warwick Road/Old Brompton Road junction.
- Reconfiguration of Empress Approach to improve pedestrian and cycle connectivity within the Early Phases Site.
- Improvements to Lillie Road, including widening of the bridge, public realm and crossings.
- A two-way cycle track on Warwick Road connecting the Early Phases land with Trebovir Road and Earls Court Square (where Quietway 15 can be accessed).
- Improved cycle facilities on Old Brompton Road and Lillie Road between Empress Approach and Eardley Crescent.
- Reconfiguration of the Lillie Road Bus Layover and inclusion of a commencing bus stop within the Layover for the Route 190.
- Improvements to bus services and/or bus infrastructure.
- West Brompton Station upgrades which may include the following: – Reconfiguration of the ticket hall providing additional gates, new ticket machines and re-provision of staff accommodation; new high-level walkway replacing the stairs to Platform 3 and providing a widened walkway to Platform 4 as well as a further connection to Platform 1; and Potential for step-free access.

6.65 The additional mitigation measures for the All Phases scenario would be the same as the Early Phases, with the following additional measures proposed to be delivered:

- Improved pedestrian crossing facilities at the A4 West Cromwell Road junction with North End Road in the form of widened pedestrian crossings; and
- A new pedestrian and cycle crossing across the A4 West Cromwell Road between the junction with North End Road and Warwick Road.
- Improvements at West Kensington Station which may comprise the following: Reconfiguration of the ticket hall providing additional gates, new ticket machines and re-provision of staff accommodation; new high-level walkway and staircase to replace the stairs to Platform 1; and potential for step-free access.

6.66 No highway capacity enhancement measures have been identified as part of the additional mitigation. The additional mitigation proposed on the highway network focuses on pedestrian and cyclist amenity. Delay to vehicles may increase along the corridors assessed because of the additional mitigation. This is due in part to the introduction of measures that improve conditions for pedestrians and cyclists which inherently add further delay to vehicular journey times.

6.67 Financial contributions, secured by S106 agreement or condition (if required) are highlighted for improvements to bus services and/or bus infrastructure and

would be targeted at the stops with the greatest impact. As stated above West Brompton and West Kensington Station are proposed to benefit from the additional mitigation package. The modelling of the Earl's Court Station layout shows that the Warwick Road entrance could accommodate the demand associated with the All Phases scenario. Key issues identified include congestion levels at District Line platform 3-4 and around the stairs between the Piccadilly Line mezzanine and District Line platforms. However, these are identified as existing issues and not because of the Proposed Development. Micro simulation modelling carried out for the All-Phases scenario shows minimal impacts at this station and as such no mitigation is considered necessary.

- 6.68 In the July 2024 Environmental Statement (ES), the demolition and construction stage for both the Early Phases and All Phases scenarios included the use of Mund Street and Aisgill Avenue as potential vehicular access points. The 2025 ES Addendum has introduced several key updates following discussions with officers. The access strategy has been revised to remove Mund Street and Aisgill Avenue as potential vehicular access points (except for emergency vehicles), resulting in a redistribution of construction traffic to other routes such as Beaumont Avenue. The updated trip generation would increase to 190 daily vehicle movements. The reassessment of the impacts, identified increased journey times on key corridors, including Warwick Road northbound and Lillie Road eastbound. However, no junctions were found to exceed critical thresholds, with Degree of Saturation (DoS) remaining below 90% and Ratio of Flow to Capacity (RFC) below 0.85. An expanded assessment of 70 additional links confirmed that most effects remained minor to moderate adverse. Mitigation measures were enhanced through an updated CTLP, revised routing strategies, and junction-specific interventions. As a result, residual effects were generally downgraded to minor adverse and not significant in EIA terms.
- 6.69 In the July 2024 Environmental Statement (ES), the completed development stage for All Phases was assessed using 2023 modelling based on conservative assumptions, including higher trip-generating land uses. The projected mode share was approximately 60–65% public transport, 30% active travel, and 10% vehicular. The overall transport impacts were generally not significant, although some moderate adverse effects were identified at key junctions and pedestrian links. Mitigation measures included embedded design features, Travel Plans, and S106 contributions to support sustainable transport infrastructure.
- 6.70 The 2025 ES Addendum introduced updated land use assumptions, reflecting a 4.8% increase in Gross Internal Area (GIA), which remained within the accepted $\pm 10\%$ modelling tolerance. Revised trip generation forecasts indicated 9,058 trips during the AM peak (62% public transport, 8% vehicular, 29% active travel) and 7,305 trips during the PM peak (60% public transport, 11% vehicular, 29% active travel), with an average daily traffic (AADT) volume of 9,222 vehicles, 20% of which would be heavy-duty vehicles (HDVs). The reassessment of impacts found that while some junctions—such as Old Brompton Road/Warwick Road—would operate near capacity, no critical failures were identified. Seventeen links were found to experience minor to

moderate adverse effects for pedestrians and cyclists. Public transport demand at a strategic level remained unchanged, with localised impacts addressed through mitigation.

- 6.71 Mitigation measures in the Addendum include a revised access strategy, introducing new pedestrian and cycle connections and removing vehicular access via Mund Street. Additional measures included updated Travel Plans, Delivery and Servicing Plans, and public realm improvements. As a result, residual effects were generally assessed as minor adverse, with some moderate adverse effects persisting on specific links, such as Link 101.

Summary of Key Changes and Mitigation Measures

Aspect	July 2024 ES	2025 ES Addendum
Access Strategy	Mund Street/Aisgill used	Removed (except emergency)
Trip Generation	175 (Early Phases)	190 (Early Phases); 9,222 AADT (All Phases)
Sensitive Links	67 assessed	70 additional links assessed
Significant Effects	Some Moderate Adverse	Mostly downgraded to Minor Adverse
Mitigation	CTLP, Travel Plans	Enhanced routing, junction upgrades, S106

Air Quality

- 6.72 The ES confirms the site is located within a borough wide Air Quality Management Area ('AQMA') due to exceedances of national air quality targets. In addition to this the north-west of the Site is located within a GLA Air Quality Focus area ('AQFA') within the Borough, specifically 65-West Cromwell Road (A4), East of the site is a GLA AQFA within RBKC: 96- Earl's Court Rd and Warwick Rd (A3220) from Cromwell Road to Cremorne Road, indicating potential for high air pollutant concentrations in these areas. The Site is located within the London wide Ultra Low Emission Zone ('ULEZ'). The Site is affected by vehicle emissions from the surrounding highway network, as well as emissions from the combined heat and power ('CHP') energy centre at the Empress State Building ("ESB"). Air quality monitoring data obtained from LBHF and RBKC show nitrogen dioxide concentrations measured at roadside monitoring locations in the study area have decreased between 2016 to 2022.
- 6.73 The potential impacts and likely effects of the Proposed Development on local air quality and the suitability of the Site for the proposed uses (residential, PBSA and older persons housing) have been assessed. Potential emission sources have been identified and assessed in the context of existing air quality and the nature and location of existing and future receptors. The main air pollutants of concern are dust and particulate matter with an aerodynamic diameter of less than 10 microgram (PM10), typically generated during demolition and construction activities and from industrial sources, and nitrogen dioxide (NO2), and particulate matter with an aerodynamic diameter of less than 10 and 2.5 (PM2.5) micrograms, typically generated by road traffic and combustion plant emissions e.g. gas boilers, emergency diesel generators.

- 6.74 The following potential impacts and associated likely effects of the Proposed Development on local air quality have been assessed for the Early Phases and All Phases scenarios:
- Demolition and construction dust impacts and associated effects on human health, ecological sites, and amenity.
 - Traffic emissions generated on the main road network from the Proposed Development and the associated effects on human health and ecological receptors.
 - Emergency generator emissions upon completion of development.
 - The Site's suitability for sensitive human health receptors because of potential air pollutant impacts from the operation of nearby existing industrial activity, as well as impacts from traffic emissions in the study area.
- 6.75 Air quality modelling has been carried out for the future predicted air quality concentrations (levels) within a completed development and considering cumulative schemes in place.
- 6.76 For the demolition and construction works, appropriate conditions are expected to reduce or mitigate the impacts of dust, Particulates (PM₁₀, PM_{2.5}) and Nitrogen Oxides (NO_x). The ES states the Early Phases of demolition and construction dust effects would not be significant. The assessment of vehicle movements during the demolition and construction stage have been based on peak vehicle movements and aimed to represent a worst-case. In the Early Phases the peak is anticipated to occur in 2028. Worst-case locations for concentrations of NO₂, PM₁₀ and PM_{2.5} have been predicted representing sensitive receptors. The assessments have concluded that the effects would not be significant.
- 6.77 Concentrations of NO₂, PM₁₀ and PM_{2.5} have been predicted for future on-site sensitive receptor locations and include the contributions from road traffic, the West London Line, the adjacent MOPAC energy centre and background concentrations. For the completed development, concentrations of NO₂, PM₁₀ and PM_{2.5} have also been taken into consideration including the use of a large number of carbon-based fuel (HVO) emergency generators. It is considered that the demolition and construction of the existing Early Phases or completed proposed development would give rise to adverse effects on local air quality at sensitive receptors without mitigation.
- 6.78 The July 2024 ES concluded that air quality impacts during the demolition and construction phases of both the Early Phases and All Phases of the development would be adverse without mitigation. The 2025 ES Addendum reaffirmed these conclusions, incorporating updated modelling and traffic data, including the removal of the Mund Street access point. The revised assessment confirmed that the nature and magnitude of impacts remained unchanged, with no new significant effects identified. Although WHO air quality guideline Value levels for NO₂, PM₁₀, and PM_{2.5} continue to be exceeded at most receptors, these exceedances are attributed mainly to existing baseline conditions.

Ecological impacts at Brompton Cemetery SINC were also reassessed, showing a reduced spatial extent of deposition exceedances compared to the 2024 ES, and remaining not significant.

- 6.79 For the completed development stage, the July 2024 ES found that emissions from road traffic and carbon-based fuel (HVO) emergency generators would result in adverse effects. Concentrations of NO₂, PM₁₀, and PM_{2.5} were predicted to remain below National Air Quality Objectives (NAQOs) at all receptors, although WHO air quality guideline Values for these air pollutants were exceeded. The 2025 ES Addendum confirmed these findings, with updated modelling show no exceedance of NAQOs and no significant effects. Emergency carbon based HVO generator emissions were conservatively modelled for a 72-hour operation scenario, and results showed a low probability of exceeding short-term NO₂ objectives. Ecological receptor impacts remained not significant, with reduced deposition exceedances. Site suitability was reaffirmed, with air quality deemed acceptable for proposed uses with additional mitigation.
- 6.80 Mitigation measures remain consistent across both assessments. While no new mitigation is required to meet NAQOs, planning conditions are proposed to align with the LBHF Air Quality Action Plan (2025–2030), which commits to meeting WHO 2021 guideline levels by 2030. These conditions would use WHO Air Quality Guideline Values as triggers for identifying locations where mitigation may be necessary. Enhancement measures are proposed in respect of air quality.

Noise and Vibration

- 6.81 The site is affected by several sources of existing noise and vibration. These include road traffic on the local road network, rail traffic on the railway lines running through the site, the underground network, aircraft travelling to and from Heathrow Airport, and industrial operations at LBD.
- 6.82 Environmental noise surveys undertaken at the site and surrounding sensitive receptors have established the existing noise criteria. Vibration surveys have been undertaken with the site adjacent to key railway corridors. The survey data has been used to inform the assessment of demolition and construction stage noise effects and completed operational development stage noise effects. The survey results have also informed an assessment of the suitability of the site for residential development from a noise and vibration perspective. Noise prediction modelling has been carried out to account for the future predicted road traffic noise levels with the completed development and cumulative schemes in place. These predictions have informed the outline mitigation strategies for proposed residential façades.
- 6.83 The impacts of the demolition and construction stages for both the Early and All Phases scenarios have been quantified using industry standard noise emission data for typical demolition and construction activities. The demolition and construction noise impacts consider the worst-case, daytime demolition and construction noise levels that are expected to occur within each year of the

development programme, considering the Detailed Plots and Outline Development Zones that could be operational during that year.

- 6.84 Construction noise is expected to result in significant adverse effects during these works on parts of the Detailed Component Plots and proposed Outline Component Development Zones. Night-time noise from demolition and construction works required for works near railways would also be expected to result in significant adverse effects. Additional mitigation has been considered as part of the assessment including the provision of noise monitoring with real-time alerts at key receptor locations.
- 6.85 At this stage no contractors have been appointed. Daytime demolition and construction noise is assessed on a worst-case scenario and expected to result in significant residual adverse effects at 27 residential receptor groups, two non-residential receptors, three proposed Detailed Component Plots and 11 proposed Outline Component Development Zones. The application seeks to minimise the occurrence of significant adverse effects throughout the demolition and construction programme by implementation of best practicable means, secured through planning conditions.
- 6.86 Vibration impacts have been quantified taking into consideration best practice guidance for compaction and vibratory piling, as two activities that could result in high levels of ground-borne vibration. Once this additional mitigation is accounted for, demolition and construction vibration is expected to result in significant residual adverse effects at 14 existing residential receptor groups, two non-residential receptors, and nine proposed Detailed Component Plots and Outline Component Development Zones.
- 6.87 Additional mitigation in the form of limiting sound power levels for each potential roof plant area has been proposed. Noise from low-level building services would also be controlled so as not to exceed levels within the public realm or within any proposed outdoor amenity space. This additional mitigation, to be secured by means of appropriately worded planning conditions, mean that is suitable for residential use.
- 6.88 Similarly, the ES has considered a worst-case outline assessment of commercial activity noise from proposed commercial, entertainment, community, leisure and cultural uses within the development. Mitigation comprising operational management and meeting the minimum sound insulation ratings are proposed to minimise these effects. Licencing arrangements would also restrict the use of these facilities during the night-time (23:00-07:00), and that further assessment of night-time noise effects from individual venues within the Outline Component would be secured through suitably worded planning conditions. On this basis, no significant residual effects are expected. Additional noise impact assessments would be required at the RMA stage and alternative mitigation measures might be considered necessary to ensure appropriate mitigation is delivered to avoid significant effects. These further additional assessments would be secured by planning condition.

- 6.89 For the All Phases scenario noise impacts have been quantified considering the following: noise from building services systems associated with the Early Phases; noise from commercial activity associated with the proposed cultural venues; noise from the proposed road-to-rail vehicle ('RRV') facility; and changes in road traffic noise at the completed development stage.
- 6.90 Four cumulative schemes have been identified within 300 m of the Early Phases, and these cumulative schemes have been assessed qualitatively. These cumulative schemes have been assessed as sensitive receptors where these schemes lie within the study area. In respect of transport related noise effects, the reported demolition and construction stage and completed development stage noise assessment conclusions have accounted for cumulative schemes.
- 6.91 In summary the July 2024 ES concluded that noise and vibration impacts from demolition and construction activities across both Early Phases and All Phases would generally not be significant, with moderate adverse effects identified only at specific receptors near Empress Place and Beaumont Avenue due to road traffic noise.
- 6.92 The 2025 ES Addendum reaffirms these findings, incorporates updated modelling and revised access strategies, including the removal of Mund Street as a construction access point. While some receptors experienced increases in predicted noise levels (up to 5 dB), these did not alter the overall significance of effects, except for Empress Place and Beaumont Avenue, where moderate adverse effects were confirmed. Vibration impacts remained consistent with the original assessment, with no new significant effects identified.
- 6.93 For the completed development stage, both assessments found that road traffic noise would result in moderate adverse effects at receptors closest to Empress Place and major adverse effects at receptors adjacent to Hogarth Road, due to traffic redistribution. Beneficial effects were identified at Earls Court Gardens. Building services and operational noise assumptions were updated in the Addendum, leading to revised noise limits and a phased assessment approach secured through planning conditions. With embedded and additional mitigation, these impacts were assessed as negligible. Commercial activity noise and proposed RRV (refuse and recycling vehicle) facility noise were also reassessed, with no new significant effects identified, provided mitigation measures are implemented.
- 6.94 Mitigation measures remain largely consistent across both assessments, with additional controls introduced in the Addendum for building services noise, including phase-specific assessments and commissioning monitoring. No further mitigation was deemed feasible for road traffic noise impacts at Empress Place or Beaumont Avenue. Overall, the Addendum confirmed the validity of the July 2024 ES conclusions, while identifying a limited number of additional significant effects, primarily related to road traffic noise, and ensuring these are addressed through robust planning conditions.

Ecology

- 6.95 The Site is dominated by brownfield developed land, comprising mostly of unsealed surfaces, sparsely vegetated surfaces and buildings.
- 6.96 The site contains smaller areas of scrub (mixed and bramble), neutral grassland, modified grassland, sparsely vegetated land, built up areas and gardens, broadleaved trees, line of trees, non-native hedgerows and standing waters.
- 6.97 The Site includes two Sites of Importance for Nature Conservation ('SINC') comprising a small portion (approximately 1%) of the West London Line South of Earl's Court SINC and approximately 20% of the West London Line in the Brompton SINC. These SINC's are located within the WLL railway cuttings directly adjacent to the railway line.
- 6.98 A tree survey has been undertaken and identified eight high value amenity trees, 86 medium amenity value trees, 60 low amenity value trees, and four unsuitable trees on-site. Tree species include common native and non-native species such as Lime, Cherry, Leyland Cypress, Monterey Cypress, London Plane, Rowan, Sycamore and Norway Maple.
- 6.99 On-site habitats are considered negligible as the importance and potential of protected species is limited. The Site is used by common invertebrate species, common nesting and foraging birds, small numbers of foraging and commuting bats and potentially by hedgehogs. Black redstarts surveys confirm this protected bird species is not present at the site.
- 6.100 The ecology assessment has been informed by ecological surveys which served to confirm sensitive receptors within the study area, the on-site habitats and the potential for protected species. In addition, a biodiversity net gain (BNG) assessment of the Detailed Component landscape design and of the Outline Component's UGF Illustrative Landscape Scheme was undertaken.
- 6.101 An assessment of the demolition and construction effects and the effects of the completed development have been undertaken. Direct and indirect adverse effects on ecology and biodiversity are likely to arise, as a result of loss and degradation of habitat, loss of connectivity, disturbance and pollution. Potential impacts during the demolition and construction stage would be managed by industry good practice measures and controls set out by planning conditions. The demolition and construction programme would be sequenced, with new replacement habitat coming forward at the earliest opportunity within the appropriate season to replace any existing habitat. This would result in temporary adverse effects on designated sites, habitats, invertebrates, birds, bats and other mammals. The effects are therefore not considered to be significant.
- 6.102 The completed development would generate beneficial effects for ecology and biodiversity. These would result in habitat creation and enhancement measures provided as part of the landscaping scheme. Beneficial effects are likely to be greatest in respect of receptors that include birds and bats.

6.103 Substantial landscaping would be delivered during the Early Phases. This would be introduced through a series of landscaped open spaces, squares, public realm (boulevards, crescents, lanes) and communal residential amenity terraces, with nature playing a key component. Habitats within landscaped open spaces would vary, including areas of mature trees, grassland, climate resilient vegetation and a post-industrial garden area with recreated open-mosaic habitat. SuDS would be included with natural drainage features including rain gardens, detention ponds and swales. These would incorporate biodiversity features, where possible, as well as integrating play and inviting learning about nature. New habitats would maintain and enhance the north-south green corridor adjacent to the WLL. The 'bioline' proposal has potential to enhance biodiversity if designed well. However, the short-term impact will be significant and the loss of habitat and connectivity as well as increased disturbance could result in enough degradation that the site would lose its significance and thus its designation.

Biodiversity

6.104 For the Early and All Phases scenarios, the development would aim to provide:

- A minimum 10% Biodiversity Net Gain (BNG), as detailed in the BNG Assessment Report.
- A minimum UGF score of 0.4 would be targeted.
- Delivery of a landscape-led design to ensure ecologically valuable habitats are, where possible, retained, protected and enhanced and otherwise created.
- Enhancement of the on-site Site of Importance for Nature Conservation (SINCs) habitats, incorporating a diverse landscape and planting strategy into the Early Phases which would functionally link with the existing SINC habitats and/or mitigate for small losses.
- Provision of biodiverse green infrastructure including biodiverse roofs, green walls, rain gardens, swales with diverse native planting, hedgerows and other landscape planting of high biodiversity value. These features would be designed to maximise biodiversity value, with native species prioritised, non-native species of known biodiversity value otherwise used, and including features such as standing deadwood, log piles/stumperies, boulders, stone and sand piles and exposed soil which would benefit invertebrates and birds. The inclusion of fruiting species would support foraging birds, and the inclusion of dense areas of vegetation would support nesting birds. A wide range of native species would be utilised, providing flowers across the season to support pollinators. Night-flowering species would be included to attract moths and in turn support foraging bats.
- Planting of 144 trees within the Early Phases Detailed Component.
- Indicatively, 723 trees are proposed in the Early Phases Outline Component based on the UGF Illustrative Landscape Scheme.
- Indicatively 1,343 trees are proposed within the All-Phases Outline Component based on the UGF Illustrative Landscape Scheme.
- Sensitive lighting design is proposed to follow guidance and principles provided in the BCT and Institution of Lighting Professionals Guidance, with

an assumption against lighting of areas of important retained and new habitats and minimising light spill from lit areas.

- Interpretation boards to inform the public of sensitive and ecologically important habitats on-site.
- Appropriate maintenance/management and monitoring of retained habitats and of created wildlife habitats to maximise biodiversity value (including adherence to a Habitat Management and Monitoring Plan ('HMMP')). This would include monitoring and management of biodiverse roofs and replacement SINC habitat to ensure they remain suitable for wildlife.
- Demonstrating net gain for biodiversity to be managed appropriately throughout the completed development stage to maintain value, for a minimum of 30 years and beyond.
- Introducing a minimum of 50 bat boxes.

6.105 Overall, both All Phases scenario would result in beneficial effects on designated sites, habitats, invertebrates, birds and bats, although not significantly so. The BNG assessment confirms that a net gain of 90.38% can be achieved for the Early Phase scheme based on the Detailed Component landscape design and UGF Illustrative Landscape Scheme. This would increase to 98.97% for the All-Phases scheme. It is however noted that the Early Phases LBHF Development Scenario is only 27.08% and All Phases LBHF is 79.28%. Cumulative effects are not considered likely to be significant for ecology.

6.106 The 2025 ES Addendum reaffirmed these findings, incorporating updated surveys and design amendments, and concluded that the nature and magnitude of ecological effects remain unchanged. For both Early Phases and All Phases demolition and construction, impacts on the WLL (West London Line) SINC—whether retained or replaced by the proposed Bioline—were assessed as not significant in EIA terms, with mitigation through good practice construction measures and habitat enhancement. Overshadowing, wind microclimate, and lighting effects were reviewed and found to be negligible, with sensitive lighting design and tolerant planting proposed to support biodiversity.

6.107 In the completed development stage, concerns about increased footfall in the Brompton Cemetery SINC were addressed through transport modelling, which indicated that while pedestrian and cyclist trips may increase, the impact would be minimal due to the site's existing infrastructure, management, and urban context. The WLL SINC, whether retained or replaced, would benefit from native planting, ecological features, and restricted access, resulting in minor beneficial effects. Overall, the Addendum confirmed that the July 2024 ES conclusions remain valid, with no new significant effects identified. Mitigation measures, including biodiversity-focused design codes and sensitive landscaping, are embedded in the scheme and no additional mitigation is required.

Ground Conditions (Contamination)

6.108 Notwithstanding the site's industrial past, it is not considered to be totally contaminated. The contamination potential and risk profile are considered typical for a central London brownfield site. On-site historical land use records

classify primarily rail infrastructure in the north, west, centre and the Earl's Court Exhibition Centres in the east. The site is not located within a groundwater protection area.

- 6.109 Most of the Site has been subject to historical investigation as part of the 2013 permission, which included investigations carried out for the demolition works for the previous Earls Court Exhibition Centres.
- 6.110 Completed development and inter-project cumulative effects were scoped out of the assessment.
- 6.111 Risks to future on-site and adjacent users is considered to be Low to Moderate due to the areas of soft landscaping being proposed as part of the Proposed Development which could create potential contamination pathways.
- 6.112 There is the potential for ground gas to be present on-site owing to the presence of Made Ground, potential fuel spills from on-site tanks and the historical land uses. The risk from ground gas to future site users and adjacent site users is Low to Moderate. There is a Moderate risk to demolition and construction workers and maintenance workers during the redevelopment of the Site.
- 6.113 The Proposed Development would include areas of soft landscaping. In these areas rainfall would be able to infiltrate through Made Ground deposits which could aid the vertical migration of contaminants from shallow soils to underlying groundwater. The risk to groundwater is Low to Moderate.
- 6.114 The Site is underlain by the London Clay Formation which has the potential to contain elevated sulphate levels, therefore, there is the potential for chemical attack on below ground concrete. Given the historical uses of the Site, there is the potential for hydrocarbons to be present in shallow soils which have the potential to permeate into plastic pipes. The risk to building fabric is Low to Moderate. Given the historical land uses and the unknown quantity and composition of Made Ground at the Site, the risk to plant life is Moderate.
- 6.115 Given the identified off-site sources of contamination, there is the potential for on-site receptors to be influenced. The overall risk from off-site sources is considered to be Low to Moderate.
- 6.116 The Site is located within an area deemed to be at a high risk of unexploded ordnance (UXO).
- 6.117 Mitigation measures considered standard for brownfield sites would be secured by planning conditions. Overall, it is considered that the demolition of the existing site and construction works would not give rise to significant effects on the identified receptors assuming that the mitigation measures are implemented.
- 6.118 The 2025 ES Addendum reviewed updated proposals, including increased excavation volumes and minor changes to building footprints and below-ground parameters. It concluded that these amendments do not alter the nature or

magnitude of the previously assessed impacts. Embedded mitigation measures—such as materials management plans and waste management plans—remain appropriate and would be secured through planning conditions in consultation with the local planning authority. No new sources of contamination were identified, and baseline conditions remain materially valid. For both Early Phases and All Phases, the residual effects and mitigation strategy outlined in the July 2024 ES remain unchanged, and no additional or different significant effects have been identified in the Addendum.

Water Resources

- 6.119 The Site is in Flood Zone 3 (and partially within Flood Zone 2). The River Thames is located approximately 1.5 km south of the site. The site is located within a defended area where the Thames Tidal Barrier and river walls mitigate potential flood risk. Counters Creek is shown to have historically flowed through the site. It was however drained and filled in between 1828 and 1863. The main flood risk is from sewer and surface water flooding.
- 6.120 The effects of flood risk have been considered as part of the flood risk assessment and drainage strategy. Much of the Early Phases and part of the All-Phases development are located within Flood Zone 3a and comprises made ground that drains through a combination of infiltration and pumping to the local sewer network. The Early Phases are protected by the flood defences with only localised areas at risk of shallow flooding. To address this, minimum building thresholds and external levels have been defined. Surface water run off rates are typical for a brownfield site. Groundwater pumping may be needed during any basement construction, but effects can be mitigated through the implementation of a CEMP. Impacts on ground water quality and quantity would be mitigated through the implementation of a FWRA and Basement Impact Assessment.
- 6.121 The effects on flood risk of the completed development identify that sewer and surface water flooding would be mitigated through the implementation of the surface water drainage strategy. This would lead to a reduction in surface water run off rates. Whilst foul water generation rates would substantially increase because of the completed development this would be offset by the reduction in peak surface water run off rates, so the discharged rates into the Thames Water sewer system would be reduced.
- 6.122 Potable water demand would be managed in a sustainable manner through rainwater harvesting, grey water recycling and water efficient fixtures and fittings. The water supply strategy has been developed in discussions with Thames Water also taking into consideration the historic uses on the site. Potential impacts on shallow groundwater receptors through the introduction of basements and piled foundations will be mitigated through the implementation of the CEMP and further ground investigations.
- 6.123 The effects on water resources and flood risk are not considered to be significant based on proposed mitigation measures being implemented with beneficial effects identified in respect of the introduction of the surface water drainage strategy.

6.124 The 2025 ES Addendum reviewed updated proposals, including increased excavation volumes and minor changes to basement depths and building footprints. It concluded that these amendments do not alter the nature or magnitude of previously assessed impacts. Groundwater flood risk during both demolition/construction and completed development stages remains negligible, and embedded mitigation measures—such as sustainable drainage systems (SuDS), flood risk management strategies, and water-sensitive design—continue to be appropriate and would be secured through planning conditions. Baseline conditions, including geology and drainage regimes, remain unchanged, and updated flood mapping confirms no change in flood risk within the study area. Cumulative effects, including those from the Mund Street School site scheme, were reassessed and found to be not significant, with policy-compliant SuDS providing beneficial impacts. Overall, the Addendum confirms the validity of the July 2024 ES conclusions, with no new significant effects identified and no additional mitigation required.

Daylight, Sunlight, Overshadowing, Light Spill and Solar Glare

6.125 A two-stage approach has been adopted in relation to the daylight, sunlight and overshadowing assessments, as recommended in the Building Research Establishment Guidelines, 2022.

6.126 Stage 1 is a calculation to confirm whether a daylight, sunlight or overshadowing impact at a receptor would be noticeable and significant, by applying the BRE guidance, undertaking a comparison and change in conditions of the proposed development if built out against the existing baseline. Stage 2 considers alternative target criteria. This stage of the assessment has considered the Pre-Existing Baseline (with the Exhibition Centres on-site) and an Alternative Baseline (for the 2013 consented scheme is physically implemented on-site) in the context of the site and the selected receptor properties.

6.127 Large parts of the site comprise extensive areas of open hard standing with cleared or low-rise buildings. This is uncharacteristic of an urban location, particularly for a regeneration area in the borough, meaning that some of the immediately surrounding receptors receive unobstructed access to daylight and sunlight from across the site above the average for the borough.

Existing Baseline

6.128 For daylight, the existing baseline values of 438 surrounding properties (existing residential, religious and hotel receptors) have been considered. For the Vertical Sky Component (VSC) assessment, 55 % windows meet the acontextual industry standard criterion and for the No Sky Line (NSL) assessment, 76.9 % rooms, where layouts were obtained, meet the acontextual industry standard criteria.

6.129 For sunlight, 271 surrounding existing properties have been considered. A total of 83.5% of the rooms assessed meet the standard criteria for the Annual and Winter Probable Sunlight Hours (APSH and WPSH) assessment.

- 6.130 For overshadowing and the existing baseline scenario, 400 outdoor private and public amenity areas were tested, of which 281 (70.3%) meet the acontextual industry standard criteria of half the area receiving 2 hours+ of sun on March 21st.
- 6.131 The baseline daylight, sunlight and overshadowing compliance values are considered typical of the receptors, which comprise terraced houses or low-rise apartment buildings, and outdoor amenity areas in an inner-city location, where increase densification is taking place.
- 6.132 For the future baseline (“future baseline” refers to the predicted lighting conditions at a receptor in a defined future scenario before the proposed development is built, but accounting for other changes that are expected to occur—such as cumulative schemes, extant consents, or planned developments in the area), the VSC identified that 84.3% windows would meet the BRE recommendation of 27 % in the existing baseline condition and 99.6% rooms would meet the BRE recommendation for NSL. For sunlight, all rooms would meet the BRE recommendations for APSH and WPSH.
- 6.133 The ES states the daylight, sunlight, overshadowing and solar glare effects will vary during the different phases of the development, changing with each gradual increase in building structures on the site. The completed development for both the early and all phases of the development would represent the worst-case scenarios at the two stages of the development. During the demolition and construction works for each phase of the development, there will be temporary short term light spill effects arising from lighting used during these works. This would be controlled through conditions (the CEMP). Overall, the effects during the demolition and construction works would not be significant.
- 6.134 Stage 1 assessment concluded that 334 of the 438 properties tested would not experience significant adverse effects against the existing baseline assessment. The remaining 104 properties experience noticeable or significant adverse daylight effects.
- 6.135 For these properties, an alternative target criteria assessment has been carried out and concluded that:
- 73 properties would meet the alternative daylight target criteria and would be acceptable in consideration of context.
 - 25 properties would substantially (for the most part) meet the alternative daylight target criteria and would be acceptable in consideration of context; and
 - 6 properties would not meet the alternative daylight target criteria.
- 6.136 In summary, 76% of the properties would see no significant adverse effects. For the remaining 24% of the properties, 22% assessed would meet or would substantially meet the alternative target criteria. The remaining 2% would not meet the alternative target criteria. These are:
- 40-42 Lillie Road (LBHF)

- 7 Aisgill Avenue (LBHF)
- 7-9 Lillie Road (LBHF)
- 1 and 55 Eardley Crescent (RBKC); and
- 25 Philbeach Gardens (RBKC).

Sunlight (Early Phases)

6.137 The baseline assessment concluded that of the 271 properties assessed, there would be no significant effects to 211 properties. Of the remaining 60 properties which would experience noticeable and significant adverse effects to sunlight, the alternative target criteria assessment was carried out. It concluded that:

- 38 properties would meet the alternative sunlight target criteria and would be acceptable in consideration of context
- 17 properties would substantially (for the most part) meet the alternative sunlight target criteria and would be acceptable in consideration of contextual factors such as:
 - Historic baseline conditions (e.g. pre-existing massing or previously consented schemes),
 - Urban density and architectural form,
 - Room orientation and use, and
 - Comparative performance of similar typologies in London
- 5 properties would not meet the alternative target criteria

The contextual report concluded that while these properties did not fully meet BRE standards, their retained sunlight levels were consistent with expectations for dense urban environments and therefore not unacceptable.

6.138 In summary, 78% of the properties would see no significant adverse effects. Where significant effects are identified, 20% of the properties assessed would meet or would substantially meet the alternative target criteria. The remaining 2% would not meet the alternative target criteria. These are identified as 5 properties, all in Philbeach Gardens (RBKC).

Overshadowing

6.139 For overshadowing, 400 amenity areas have been assessed. The assessment concluded there would be no significant effects in respect of 383 amenity areas.

6.140 Applying the alternative target criteria assessment on the remaining amenity areas, the ES concluded that:

- 12 amenity areas would meet the alternative overshadowing target criteria and would be acceptable in consideration of context
- 2 amenity areas would substantially (for the most part) meet the alternative overshadowing target and
- 2 would not meet the alternative target criteria
 - 31 Philbeach Gardens

- 29 Philbeach Gardens

6.141 These remaining areas were assessed as experiencing Major Adverse and Moderate Adverse overshadowing effects respectively, with reductions in sunlight availability that exceed both the BRE Guidelines and the contextual alternative target criteria.

6.142 Both LBHF and RBKC have each appointed independent daylight and sunlight consultants to advise on the alternative target criteria proposed by the Applicant and the acceptability of the significant daylight, sunlight and overshadowing effects identified. The findings are summarised in Section 15 of the report below.

Solar Glare (Early Phases)

6.143 A total of 21 road viewpoints and 32 railway viewpoints have been assessed in respect of the potential for solar glare. The modelling concluded that no significant solar glare effects would occur.

Cumulative Effects (Early Phases)

6.144 Three cumulative schemes were included due to their proximity to the Early Phases site. The assessment concluded that there would be no cumulative effects from the early phases and the three schemes, together, on existing receptors. The Early Phases would however result in adverse effects to a consented scheme at 1-9 Lillie Road (Blocks M and N). These impacts arise due to the proximity and massing of the Early Phases buildings, which could obstruct daylight and reduce sunlight availability to windows and rooms within Blocks M and N.

6.145 Specifically, the assessment found that a large proportion of windows and rooms in these blocks would experience reductions in Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH) beyond BRE guideline thresholds. The magnitude of these reductions is classified as Moderate to Major Adverse, indicating noticeable and material losses of natural light.

6.146 When applying the alternative daylight target criteria the consented scheme at 1-9 Lillie Road would meet the targets and would not be unacceptably affected in respect of sunlight changes.

All Phases Development

6.147 For the All-Phases development the assessment concludes that there would be a change to the effects on existing surrounding properties.

Daylight (All Phases Development)

6.148 For daylight, 283 of the 438 properties assessed, would experience no significant effects. Of the remaining 155 properties, the alternative target criteria assessment has been carried out and concluded that:

- 97 properties would meet the alternative daylight target criteria and would be acceptable in consideration of context

- 36 properties would substantially (for the most part) meet the alternative daylight target criteria and would be acceptable in consideration of context; and
- 22 properties would not meet the alternative daylight target criteria.

6.149 In summary, 65% of the properties would see no significant adverse effects. Where significant effects are identified, 30% of the properties assessed would meet or would substantially meet the alternative target criteria. The remaining 5% would not meet the alternative target criteria. These properties are identified as:

- Flats 1-10 and Flats 46-55, Kensington Hall Gardens (LBHF)
- No. 177 North End Road (LBHF – within the Site boundary)
- Nos. 40-42 Lillie Road (LBHF)
- Nos. 9-28, 29-38 Gibbs Green (LBHF)
- Nos. 1, 2, 3-8, 9, 10 and 14 Dieppe Close (LBHF)
- No. 7 Garsdale Terrace (LBHF)
- Flats 14B, 14C and 14D Aisgill Avenue (LBHF)
- No. 7 Aisgill Avenue (LBHF)
- Nos. 7-9 Lillie Road (LBHF)
- Nos. 1 and 55 Eardley Crescent (RBKC); and
- Nos. 25 and 35 Philbeach Gardens (RBKC).

Sunlight (All Phases Development)

6.150 The assessment concluded that of the 271 properties assessed, there would be no significant effects to 198 properties. Of the remaining 73 properties which would experience noticeable and significant adverse effects to sunlight, the alternative target criteria assessment was carried out. It concluded that:

- 40 properties would meet the alternative sunlight target criteria and would be acceptable in consideration of context
- 25 properties would substantially (for the most part) meet the alternative sunlight target criteria and would be acceptable in consideration of context and
- 8 properties would not meet the alternative target criteria.

6.151 In summary, 73% of the properties would see no significant adverse effects. Where significant effects are identified, 24% of the properties assessed would meet or would substantially meet the alternative target criteria. The remaining 3% would not meet the alternative target criteria. The remaining 8 properties not meeting the alternative target criteria, all are in Philbeach Gardens (RBKC).

Overshadowing (All Phases Development)

6.152 For overshadowing, 400 amenity areas have been assessed. The initial assessment concluded that there would be no significant effects in respect of 374 amenity areas. Of the remaining 26 amenity areas which would experience noticeable and significant adverse overshadowing effects, the alternative target criteria assessment concluded that:

- 17 amenity areas would meet the alternative overshadowing target criteria and would be acceptable in consideration of context
- 4 amenity areas would substantially (for the most part) meet the alternative overshadowing target; and
- 5 would not meet the alternative target criteria. These areas are:
 - Nos. 40–42 Lillie Road
 - Nos. 7–9 Lillie Road
 - 1 Eardley Crescent
 - 25 Philbeach Gardens
 - 55 Eardley Crescent

6.153 Amenity areas were identified as experiencing significant overshadowing effects that exceed both the BRE Guidelines and the contextual alternative target criteria. The impacts are primarily due to reductions in sunlight availability below acceptable thresholds, and in these cases, contextual factors such as architectural self-obstruction or restrictive neighbouring buildings did not sufficiently mitigate the effects.

Solar Glare (All Phases)

6.154 As with the Early Phases a total of 21 road viewpoints and 32 railway viewpoints have been assessed in respect of the potential for solar glare. The modelling concluded that no significant solar glare effects would occur.

Cumulative Effects

6.155 Three cumulative schemes were considered due to their proximity to the site. The assessment concluded that there would be no cumulative effects from the Early Phases and the three schemes, together, on existing receptors. The development would result in significant adverse effects to the consented scheme, 1-9 Lillie Road Blocks M and N, however, this consented scheme would meet the alternative daylight target criteria as mentioned above. The consented schemes would not be unacceptably affected in respect of sunlight changes.

6.156 The overall findings for the Earls Court Development in both the Early Phases and All Phases indicate that while a few receptors experience Moderate to Major Adverse effects in terms of daylight, sunlight, overshadowing, and solar glare, most impacts are either BRE compliant or acceptable when assessed against contextual alternative criteria. Significant effects are concentrated in areas such as Philbeach Gardens, Eardley Crescent, and Lillie Road, with a small proportion of properties and amenity spaces falling beyond acceptable thresholds. However, no additional mitigation is proposed, as embedded design measures are considered sufficient, and solar glare and light spill effects remain negligible throughout.

6.157 The 2025 ES Addendum for the Earls Court Development reaffirms the overall findings of the July 2024 Environmental Statement (ES) in relation to daylight, sunlight, overshadowing, solar glare, and light spill, while incorporating updates based on post-submission consultation and refined modelling.

6.158 For both Early Phases and All Phases, the completed development effects remain largely consistent with the original ES, with minor adjustments due to updated floorplans, room uses, and massing refinements. Notably, some receptors have seen some improvements (e.g. Fairburn House and Whiteley's Cottages), while others experienced worsened impacts (e.g. Flats 21–35 Kensington Hall Gardens and 42 Philbeach Gardens). The cumulative effects remain valid, with the Mund Street School planning application site now added as a new qualitative receptor. Importantly, no additional mitigation measures are proposed, as embedded design changes (e.g. massing reductions at Plot WK02) are deemed sufficient. Overall, the Addendum confirms that most receptors either meet or substantially meet BRE or contextual criteria, with only a small proportion falling beyond acceptable thresholds.

Wind Microclimate

- 6.159 Wind tunnel modelling of the existing wind conditions at the site (272 measurement locations selected) and surrounding study area (62 measurement locations, 334 locations in total) indicate that existing conditions are suitable for sitting to walking use during the windiest season and generally one category calmer during the summer season.
- 6.160 Wind tunnel testing of the existing site, compared with the Detailed Component and the Outline Component was undertaken within the context of existing and cumulative surrounding buildings to quantify the local wind microclimate. In addition to assessing the Early and All Phases development scenarios of the proposed development (including the detailed and outline component), the Illustrative scheme has also been assessed. The Illustrative scheme comprises the detailed component and an illustrative version of how the outline component could be delivered. In total, nine configurations were tested for the Proposed Development (with 491 receptor locations) and four for the Illustrative Scheme.
- 6.161 The testing carried out was for the Early Phases and All Phases scenarios. The wind tunnel testing was initially undertaken in the absence of landscaping on-site, representing a worst-case scenario. Landscaping was then introduced to the modelling to establish the required additional mitigation and confirm the effectiveness of the mitigation
- 6.162 Wind speeds conditions are assessed in terms of pedestrian comfort, as well as pedestrian and cyclists' safety, including assessing the impact on the occupants of buildings (residents and workers), as well as the general population. Conditions are based on sitting and standing use at amenity spaces or at entrances to buildings and on walking and strolling use through the site's thoroughfares.
- 6.163 Two existing areas are identified where there are occurrences of strong winds with the potential to be a safety concern to pedestrians and cyclist. These two areas are off-site and located at the southern corner and to the north of the Empress State Building.

Demolition and Construction Works

- 6.164 The wind condition effects during demolition and construction works are expected to change from the existing conditions and between the different stages of the Early and All Phases development. During the demolition and construction works, typical appropriate health and safety measures are expected to be implemented to ensure that the demolition and construction workers are adequately protected. Interim and temporary situations would occur for surrounding pedestrian uses however, but on the whole it would remain suitable for their existing uses. Accordingly, it is considered that the demolition and construction works would not give rise to any significant adverse effects in respect of pedestrian comfort and pedestrian and cyclist safety.

Early Phases

- 6.165 Upon the completion of detailed component of Phase 1, which includes the key public realm and central open space works and associated landscaping, new on-site receptors would be introduced within completed buildings while construction works continue on the rest of the site. The remaining parts of Phase 1 are in outline and would be subject to detailed design and desk-top or wind tunnel testing (secured by planning condition) as part of the RMA stages.
- 6.166 Mitigation would be embedded and implemented within Phase 1 as a whole and each of the subsequent phases would be informed by desk-top or wind tunnel testing to be undertaken as part of the RMA stages. Accordingly on-site receptors of occupied units, meanwhile uses and construction workers are not expected to be significantly affected.
- 6.167 For the effects of the completed development for the Early Phases, wind tunnel testing of 397 locations (62 existing off-site and 335 proposed on-site locations including 14 podium, 29 roof top and 35 balcony locations) were undertaken. Existing receptor locations (Lillie Bridge Depot, 9 Beaumont Avenue, North End Road and West Kensington Station) would remain operational in the Early Phases. These locations would have acceptable wind conditions suitable for standing, thoroughfare and strolling use ensuring continued operation of these.
- 6.168 The assessment of the Early Phases concludes that there would be 376 locations with suitable wind conditions for the proposed uses. 21 locations, majority of which are within the detailed component plots would have significant adverse effects at the proposed ground level for seating area purposes, and proposed podium /terrace level seating and mixed-use amenity areas. To mitigate these effects, the detailed and illustrative (associated with the outline component) landscaping schemes include mitigation. With additional mitigation in place, it is considered that 18 of the 21 locations identified would now be suitable for their proposed use. It is expected that the remaining three locations could be successfully mitigated subject to further testing and design measures.
- 6.169 In terms of the cumulative effects, consented schemes up to 200m from the site boundary have been identified and assessed. Receptor locations at the existing Lillie Bridge Depot, 9 Beaumont Avenue, North End Road and West Kensington Station which would remain operational in the Early Phases would be suitable

for standing, thoroughfare and strolling use and would be acceptable for the continued operation of the existing uses.

- 6.170 The assessment of the Early Phases in the context of cumulative buildings concludes that there would be 376 locations with suitable wind conditions for the proposed uses. However, there would be 22 locations majority of which are within the detailed component plots with significant adverse effects at proposed entrances, ground level seating areas, and proposed podium/terrace/roof level seating and mixed-use amenity areas. Proposed additional mitigation would remain the same as that assessed in the context of the existing surrounding buildings. Similarly, a small number of areas would require further mitigation.

All Phases – Completed Development

- 6.171 For the All Phases scenario, it was concluded that there would be 373 locations with suitable wind conditions for the intended uses. However, there would be 17 locations with significant adverse effects at proposed ground level, podium and roof level seating amenity areas at the detailed plots. Proposed additional mitigation would remain the same as that assessed in the Early Phases assessment and would be secured by planning conditions. With additional mitigation in place, 10 of the 17 locations would be suitable for their proposed use. It is expected that the remaining seven locations could be successfully mitigated, subject to further testing to be secured by planning condition.
- 6.172 The 2025 ES Addendum confirms that the wind microclimate effects of the Amended Proposed Development remain broadly consistent with the findings of the July 2024 ES, for both the Early Phases and All Phases scenarios. The amendments—such as minor changes to building footprints, heights, and the addition of balconies and terraces—were assessed qualitatively and found to have no material impact on wind conditions. All previously identified significant effects remain valid, and no new significant adverse effects were introduced.
- 6.173 For completed development, wind conditions at entrances, terraces, balconies, and public spaces are generally acceptable, with most locations experiencing negligible or minor beneficial effects. One location (Plot EC06 nursery entrance) initially showed minor adverse effects, but this was mitigated through landscaping measures already embedded in the design.
- 6.174 Cumulative effects with nearby schemes (70–80 Lillie Road and Mund Street School site) were also assessed and found to be unlikely to result in significant impacts, due to their lower height and positioning relative to prevailing wind directions
- 6.175 Mitigation and enhancement measures proposed in the 2024 ES remain valid and sufficient. A sensitivity test was conducted for potential future entrances in the Outline Component, identifying several locations where windier-than-required conditions may occur, but these will be addressed at the Reserved Matters Application (RMA) stage.

- 6.176 In summary, the 2025 Addendum concludes that no additional or different significant wind effects are expected, and the 2024 ES assessments remain robust and applicable to the amended scheme.

Climate

- 6.177 The climate change resilience ('CCR') assessment has reviewed the potential vulnerability of the Early Phases to extreme weather and projected climate change during the demolition and construction works. Consideration was given to environmental and human health; buildings and infrastructure; heatwaves and drought conditions. The potential impacts of climate change such as extreme weather events are classified as adverse. The likelihood rating found in the assessment is "unlikely" and the significance rated as "not significant". Additional mitigation measures beyond those already proposed are not considered to be necessary.

In-Combination Climate Impact

- 6.178 An in-combination climate impact ('ICCI') assessment has reviewed the potential for climate change to exacerbate the demolition and construction effects reported within each of the assessments of the individual technical topics in the EIA as a whole, in respect of topic specific receptors. Considering embedded mitigation measures and the conclusions of these assessments, it has been concluded that the Early Phases would not result in a significant effect on climate and identified receptors.
- 6.179 The 2025 ES Addendum confirms that the climate-related assessments for the Earls Court Development remain consistent with the findings of the July 2024 ES, across both the Early Phases and All Phases scenarios. The updated assessment incorporates minor amendments to floorspace schedules, Whole Life Carbon Assessment (WLCA), and traffic data, but these do not result in any new or different significant effects.
- 6.180 For completed development, the Climate Change Resilience (CCR) and In-Combination Climate Impact (ICCI) assessments remain valid, with embedded mitigation measures such as Sustainable Drainage Systems (SuDS) and crane management strategies continuing to be appropriate. The Greenhouse Gas (GHG) emissions estimates have been refined using updated benchmarks and traffic data, showing a small increase in emissions for Early Phases and a slight reduction for All Phases. These emissions remain compatible with national, regional, and sectoral carbon budgets, and align with the 1.5°C science-based trajectory and net zero strategies of the GLA, LBHF, and RBKC.
- 6.181 Cumulative effects are unchanged, with intra-project impacts remaining valid and no inter-project cumulative effects considered. Mitigation measures and offsetting payments (e.g. via Section 106 agreements) remain unchanged and sufficient. Overall, the Addendum concludes that no additional or different significant climate effects arise, and the scheme continues to meet policy and environmental objectives.

Built Heritage

- 6.182 The ES has identified 93 heritage receptors in a detailed Townscape, Heritage and Visual Impact Assessment ('THVIA').
- 6.183 On-site, two small parts of Earl's Court Station (a Grade II listed building) are included: a below ground ticket hall, escalator hall and pedestrian subway tunnel that run beneath Warwick Road and a small, single storey structure that provides a fire escape from the below ground ticket hall. These are no longer in use and are excluded for development in the hybrid planning application submitted to RBKC.
- 6.184 Two small parts of conservation areas are included within the proposed development site. For RBKC, this is the Philbeach Conservation Area to the east and south-east and in LBHF, the Barons Court Conservation Area in the north-west corner of the site. Through the THVIA the applicant has also considered several assets as non-designated heritage assets, although these receptors do not appear on the LBHF Local List (Buildings of Merit), with their designation owing to consideration of the NPPF approach and associated guidance. These assets are: 9 Beaumont Avenue in the north-west and Lillie Bridge Depot Train Maintenance Shed in the west, both located within the application site boundary and included in the assessment for this borough.
- 6.185 There are numerous conservation areas within 500 m of the site boundary. These comprise the Olympia and Avonmore CA; and Queen's Club Gardens CA for LBHF and the Brompton Cemetery CA; Nevern Square CA and Earl's Court Square CA for RBKC.
- 6.186 The Church of St Cuthbert and St Matthias is a Grade I listed building in RBKC to the north-east of the site. Brompton Cemetery is a Registered Park and Garden also located in RBKC, to the south-east of the site.
- 6.187 The demolition and construction works to enable subsequent development of the Early Phases would not result in any likely significant effects on any built heritage receptor. The demolition and construction of all phases, (including the phases currently presented in outline form), would however have a significant adverse effect based on the worst-case scenario involving the complete demolition of the LBD Train Maintenance Shed and 9 Beaumont Avenue. The effect would be subject to mitigation through Historic Building Recording to maintain the historic interest of the building as part of local archives.
- 6.188 There would be adverse, but not significant, effects on the following heritage receptors in LBHF. These impacts are considered to all fall in the range of less than substantial harm considering the NPPF test:
- Olympia and Avonmore CA
 - Gunter Estate CA
 - Barons Court CA
 - Queen's Club Gardens CA
 - 8 and 20 Avonmore Road (locally listed buildings)
 - Avonmore Gardens (locally listed building)

- Kensington Village (locally listed building).
- Baron's Court House (locally listed building)
- 2 and 23 Baron's Court Road (locally listed buildings)
- 5 Barton Road (locally listed building)
- 2, 6 and 13 Castletown Road (locally listed buildings)
- 1 Challoner Crescent and 1 Challoner Street (locally listed buildings)
- Institute of Indian Culture (locally listed building)
- 4, 30 and 43 Comeragh Road (locally listed buildings)

6.189 There would be a beneficial effect because of the demolition of Ashfield House. There would be beneficial effects on West Brompton Station including the Booking Hall and Train Shed and Staircases and Retaining Wall and Earls Court Station derived from the change to their setting which would improve the character and appearance of the arrival experience to the area and provide better opportunities to admire and appreciate the buildings through an improved public realm.

Townscape Effects

- 6.190 The townscape assessment for the development concludes that, while the proposed scheme introduces significant change in scale and massing, particularly through the inclusion of tall buildings, the overall townscape effects are considered acceptable and not significant in EIA terms. The development would transform a large, underutilised site into a new urban quarter, with a mix of uses and generous public realm, including new parks and pedestrian routes. The design has evolved in response to consultation with stakeholders, including Historic England, RBKC, LBHF, and the GLA, and incorporates mitigation measures such as design codes to manage massing, materiality, and architectural articulation.
- 6.191 The Early Phases and All Phases scenarios were assessed using verified views and townscape character area analysis. While some views would experience noticeable change, particularly where new buildings terminate vistas or appear above existing rooflines, these changes are generally considered in the townscape assessment to be of low to moderate impact. In most cases, the new development will be read as a background layer of modern urban form, distinct from the historic townscape, and will not detract from the appreciation of heritage assets or townscape character areas.
- 6.192 Cumulative effects with other nearby schemes were also considered. These do not materially alter the conclusions of the assessment, as the combined visual impact remains within acceptable thresholds. Overall, the townscape effects are judged in the townscape assessment to have a predominantly minor adverse/negligible to beneficial impacts with no significant harm identified, and the proposals are considered compatible with the character and evolution of the surrounding urban context. Additional townscape impacts both moderate/major adverse have been identified within additional RBKC local views by RBKC officers. The ES addendum considers these assets; however, the assessment concludes no impact or negligible (not significant) impacts.

Cumulative Effects

- 6.193 Cumulative effects have been considered for each of the relevant topics. During the demolition and construction stages, both beneficial and adverse effects have been identified to likely to arise in respect of existing and future on-site/off-site users, existing and future pedestrians and cyclists; existing drivers on the highway network; as well as existing on-and off-site ecological receptors. During the demolition and construction works, receptors in proximity would be affected to some degree by a combination of traffic, noise, vibration, dust and visual disturbance ranging from significant adverse. However, to minimise these effects control measures through the CEMP and CTLP mitigation measures are identified to reduce the effects. Upon completion of the development both beneficial and adverse effects are likely to arise in respect of existing off-site users, existing and future on-site users, existing and future pedestrians and cyclists, existing drivers on the highway network, and existing on-and off-site ecological receptors.
- 6.194 The 2025 ES Addendum broadly reaffirms the findings of the July 2024 ES, with minor updates reflecting design refinements and stakeholder feedback. For both early phases and all phases of the completed development, the addendum confirms that no new or different significant built heritage effects would arise. The amendments—such as slight reductions in building heights (e.g. Plot EC03), refined design codes to improve articulation and respond to heritage context (e.g. EC10, WB04), and minor footprint changes—are considered minor in terms of their impact on heritage receptors. The cumulative assessment, including the addition of the Mund Street School site redevelopment scheme, also concludes no material change to the overall effect. Mitigation measures remain unchanged, and the heritage value of all receptors—including four newly assessed ones (Cheyne and Royal Hospital Conservation Areas and Grade II* listed 1-8 and 9-18 Collingham Gardens and 11A and 18A Collingham Gardens)—is preserved. Overall, the addendum supports the original ES conclusion that the development would result in negligible, neutral, minor or moderate adverse effects on built heritage, with no significant adverse impacts identified.

Conclusion

- 6.195 The application has been assessed in accordance with the Environmental Impact Assessment Regulations 2017. The Council's EIA consultants commissioned to undertake an independent review of the ES, are generally satisfied that, in their professional opinion, the ES Addendum is compliant with the requirements of the EIA Regulations. Each section of the ES has also been reviewed by officers and have considered any measures envisaged to avoid, prevent, reduce and, if possible, offset likely significant adverse effects on the environment. The report also specifies how these measures could be secured if the application were being recommended for approval e.g. through planning conditions and/or planning obligations.

7 POLICY CONTEXT

- 7.1 The Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the main statutes concerned with planning in England.
- 7.2 Collectively the three Acts create a plan led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan, unless there are material considerations which indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 7.3 The Development Plan consists of the London Plan (2021) and the Hammersmith and Fulham Local Plan (2018). Consideration has also been given to the Planning Guidance Supplementary Planning Document 2018 (hereafter referred to as Planning Guidance SPD), the Affordable Workspace SPD (March 2022) and several other strategic and local supplementary planning guidance documents that are material to the determination of the application. Consideration has also been given to the RBKC New Local Plan, adopted on 24 July 2024, replacing the previous 2019 Plan.
- 7.4 The relevant policies and standards for the London Plan and LBHF Local Plan are listed in Appendix C of the report.
- 7.5 The following GLA planning guidance is also considered of relevance to this application.

London Plan

- Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- Accessible London: Achieving an Inclusive Environment SPG (2014)
- Housing SPG (2016)
- Affordable Housing Viability SPG (2017)
- The Mayor's Environment Strategy (2018)
- London Local Air Quality Management (LLAQM) Technical Guidance (2019)
- Energy Planning Guidance (2022)
- Sustainable Transport, Walking and Cycling LPG (2022)
- 'Be seen' Energy Monitoring Guidance LPG (2022)
- Whole Life-Cycle Carbon Assessments LPG (2022)
- Circular Economy Statement LPG (2022)
- Characterisation and Growth Strategies LPG (2023)
- Housing Design Standards Local Plan Guidance ('LPG') (2023)
- Urban Greening Factor LPG (2023)
- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Air Quality Neutral LPG (2023)
- Air Quality Positive LPG (2023)
- Large-Scale Purpose-Built Student Accommodation LPG (2024)

Draft London Plan publications for consultation

- Fire Safety draft LPG (February 2022)

- Affordable Housing LPG (May 2023)
- Development Viability LPG (May 2023)
- The GLA published an 'Accelerating Housing' Delivery practice note in December 2024 which is a material consideration for the purposes of determining planning applications

7.6 LBHF has several adopted Supplementary Planning Documents ("SPDs"). The following ("SPDs") have been considered:

- Planning Guidance SPD (2018)
- Affordable Workspace SPD (March 2022)
- Railway Arches SPD (March 2022)
- Strategic Flood Risk Assessment (2022)
- Trees and Development SPD (2023)
- Climate Change SPD (2023)
- Hammersmith Town Centre SPD (August 2024)
- Carbon Offset Cost Guidance Note (April 2025) (this is not, technically, a SPD, but it is considered to contain guidance that is relevant to this application)

7.7 LBHF has also published their Upstream London industrial strategy in November 2024, which is a material consideration. Upstream Nexus is a partnership between Hammersmith & Fulham Council and Imperial College London.

7.8 In addition to the Development Plan, regard has been had to the National Planning Policy Framework ("NPPF") and the national Planning Practice Guidance ("PPG").

The National Planning Policy Framework (NPPF) – December 2024 (as amended February 2025)

7.9 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. The NPPF, is supported by the Planning Practice Guidance (PPG), and sets out national planning policies and how these are expected to be applied. The NPPF was revised (12 December 2024) with further amendments (7 February 2025) since the submission of the planning application. The current version of the NPPF is still referred to as "December 2024" and replaced the previous version published in December 2023. The 2023 NPPF was relevant at the time of the submission of the application.

7.10 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England, and how these are expected to be applied. **Paragraph 2** of the NPPF states "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise". Other relevant sections of the NPPF are set out in the following paragraphs.

7.11 **Paragraph 10** of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development”. That presumption is set out in paragraph 11. For decision-taking this means:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”

7.12 The “assets of particular importance” referenced in para. 11(d)(i) include “designated heritage assets” (footnote 7).

7.13 Other key components of the NPPF are covered under the relevant sections of the report.

7.14 Several sections of the national PPG are relevant to the proposal, specifically the guidance on topics relating to air quality, climate change, CIL, contamination, design, effective use of land, EIA, flood risk and climate change, healthy and safe communities, historic environment, housing, light pollution, natural environment, noise, renewable and low carbon energy, town centres and retail, transport, trees, viability, waste and water. The sections relating to procedures are also relevant, such as the sections on consultation and pre-decision matters, determining a planning application, planning obligations and use of planning conditions.

7.15 Emerging planning policies at the London and borough levels are material considerations that can be given weight in line with paragraph 49 of the NPPF.

The London Plan

7.16 The London Plan was published in March 2021. As the overall strategic plan for London, it sets out an integrated economic, environmental and social framework for the development of London over the next 20-25 years.

7.17 The London Plan defines three OAs within Hammersmith and Fulham. The OAs are detailed in Table 2-2 alongside indicative homes and jobs targets up to 2041. The site forms part of the Earls Court and West Kensington Opportunity Area (“ECWKO”). The London Plan identifies this area as having an indicative capacity of 6,500 new homes and 5,000 jobs.

Hammersmith and Fulham's Local Plan

- 7.18 Hammersmith and Fulham's Local Plan represents the strategy for future development of the borough. Four regeneration areas are identified within the borough. The regeneration areas are anticipated to deliver 19,800 new homes, and 29,500 new jobs in the period up to 2035.
- 7.19 The application site is in the Fulham Regeneration Area (FRA). **Strategic Site Policy FRA** identifies an anticipated delivery of 7,000 new homes and 9,000 new jobs in this regeneration area.
- 7.20 **Strategic Site Policy FRA1** states that the Council will support the phased mixed use residential-led development of the Earls Court and West Kensington Opportunity Area. FRA1 states that development proposals should:
- provide a mix of land uses, including housing, employment, hotels, leisure and associated facilities, retail and cultural facilities
 - provide adequate social, physical, environmental and transport infrastructure to support the needs of the area as a whole
 - provide green corridors and public open spaces including the provision of a centrally located local park of at least 2 hectares.
- 7.21 Other relevant policies and standards in the Local Plan and the Council's SPDs are set out in the following sections of the report.
- 7.22 The Council is in the process of updating the Local Plan. The current Local Plan was adopted in February 2018. This first iteration of the Draft Local Plan has been produced and is currently out for consultation. The Local Plan (Regulation 18) consultation runs for 6 weeks from 29 October until 10 December 2025.
- 7.23 The new Local Plan contain the Council's vision and proposed policies for guiding and promoting development in the borough up to 2042. Following the Regulation 18 consultation, the Council is expected to make changes to the Plan, where appropriate, and will then publish the Regulation 19 version of the Plan that it intends to submit to the Secretary of State for examination. An Examination in Public will then be undertaken by an independent Inspector appointed by the Secretary of State before it can be adopted by the Council. As the Draft Local Plan is at the first stage of the review process, only limited weight is given to this document.

8 PLANNING CONSIDERATIONS/ASSESSMENT

- 8.1 In determining the planning application, consideration has been given to the supporting drawing and documents accompanying the submission including the Environmental Statement (ES), the updated information, the consultation responses, the Development Plan, and other material considerations including SPGs, SPDs and emerging policy.

- 8.2 It is necessary to assess all the policies in the Development Plan and come to a view as to whether considering the plan as a whole the proposal does or does not accord with it.
- 8.3 The following section of the report provides an analysis of the specific aspects of the Proposed Development and the principal issues that need to be considered in the determination of the planning application.
- 8.4 The key considerations material to the determination of this planning application are:
- **Principle of development: (Section 9)**
 - Mixed Land Use Development
 - Opportunity/Regeneration Area
 - **Housing: (Section 10)**
 - Residential (Class C3) including housing mix and tenure and Affordable Housing
 - Viability Assessment
 - Residential Density
 - Standard of Accommodation including amenity and play space provision and Wheelchair Units
 - Purpose-Built Student Accommodation (“PBSA”)
 - Co-living
 - Employment Related Accommodation (“ERA”)
 - Older Persons Housing
 - **Non-Residential Uses – Commercial: (Section 11)**
 - Offices; Research and Development and other workspaces, including Affordable Workspace
 - Culture
 - Retail & Leisure
 - Hotel
 - Social Infrastructure
 - Storage & Distribution
 - Sui Generis Uses
 - **Design, Conservation and Heritage including Townscape (Section 12)**
 - Policy Review
 - Design-Led Approach (Detailed / Outline Components)
 - Layout and legibility,
 - Building Heights, Scale and Massing (including Tall Building Statement)
 - Townscape and Heritage
 - Heritage Constraints
 - Impacts on Heritage Assets
 - Impact on Strategic Local Views

- **Ecology, including Urban Greening & Net Biodiversity Gain (Section 13)**
 - Ecology
 - Nature Conservation
 - Landscape/Public Realm including trees
 - Urban Greening Factor and Biodiversity Net Gain
 - Children's Play Space
- **Accessibility & Inclusivity / Fire Safety / Designing out Crime /and Community Safety & Security (Section 14)**
- **Amenity Considerations: (Section 15)**
 - Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill
 - Daylight/Sunlight/Overshadowing within the development
 - Overlooking & Privacy
- **Highways and Transport (Section 16)**
 - Policy review
 - Site location and access to public transport
 - Trip generation
 - Travel planning
 - Access and permeability
 - Public realm
 - Cycle parking
 - Car parking and vehicle access
 - Refuse and Recycling
 - Deliveries and servicing
 - Demolition/Construction logistics
 - Transport Assessment
 - Highway works
 - Pedestrian, Cycling and Environmental Improvements
 - Micro and shared mobility Improvements
- **Environmental Considerations (Section 17)**
 - Sustainability Strategy, including Climate Change
 - Energy Strategy including carbon reductions
 - Overheating Strategy
 - Whole Lifecycle Carbon and Circular Economy
 - Ground Conditions (Land Contamination)
 - Archaeology
 - Air Quality
 - Water Resources including Flood Risk and Drainage
 - Noise and Vibration
 - Wind & Microclimate
 - Aviation Safety
- **Economic Considerations & Equalities Section: (Section 18)**
 - Employment and Training
 - Health Impact Assessment

- Duties under the Public Sector Equality Duty (Section 149 of the Equality Act 2010) and
- Human Rights
- **Community Infrastructure Levy (CIL) and Legal Agreement (Section 19)**
 - Including Section 106 Heads of Terms.

9 PRINCIPLE OF THE DEVELOPMENT

- 9.1 **Chapter 2 (Achieving Sustainable Development) of the NPPF** establishes the presumption in favour of sustainable development, undertaken in the context of a plan-led system. Paragraph 8 identifies the three overarching objectives as economic, social and environmental, which interact to deliver a strong, responsive and competitive economy; strong, vibrant and healthy communities; and protection and enhancement of natural and historic environments.
- 9.2 The London Plan sets out key principles for the delivery of good growth within London in this national context.
- 9.3 **Policy GG1 (Building strong and inclusive communities)** aims to support good growth and strong and inclusive communities through the creation of high quality, accessible and resilient environments and the associated generation of economic and other opportunities.
- 9.4 **Policy GG2 (Making the best of use of land)** states that delivery of the objectives of policy GG1 can be achieved through the creation of successful mixed-use places, identifying Opportunity Area as a key delivery vehicle. Policy GG2 also promotes the proactive exploration of intensification of the use of land to support delivery of new homes and workspaces, applying a design-led approach to determine the optimum capacity of sites. The policy advocates a contextual approach to design to strengthen London's varied character, whilst promoting sustainable approaches to travel. Alongside this, **policy GG4 (Delivering the homes that Londoners need)** recognises the need for a housing market that works better for all Londoners, and prioritises the delivery of good quality homes, including genuinely affordable homes, to create mixed and inclusive communities.
- 9.5 **London Plan policy GG5 (Growing a good economy)** sets out the Mayor's good growth policy with regard to growing London's economy, recognising the role that economic growth plays in the delivery of other aspects of sustainable development and the need for that success (and its benefits) to be shared. The policy seeks to conserve and enhance London's global economic competitiveness, whilst making the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity. It also sets out the need for development to promote the strength and potential of the wider city region, and for sufficient employment and industrial space to be provided in the right locations to support economic development and regeneration. The policy

identifies the need for London to continue to provide leadership in emerging industries such as innovation, research, policy and ideas, and that development should support London's role as an international incubator and centre for learning, particularly in the context of delivering sustainable development that promotes the transition to a low carbon economy. The policy recognises that this should sit alongside recognition of London's rich heritage and cultural assets and its role as a 24-hour city.

- 9.6 **London Plan policy GG6 (Increasing efficiency and resilience)** requires developments to contribute towards London becoming a more efficient and resilient city by supporting the move towards a low carbon circular economy and adapting to climate change. Key components include improving energy efficiency and moving toward a zero-carbon city by 2050, designing buildings and infrastructure to be climate-resilient, ensuring water efficiency, making the most of water supply, and addressing flood risk. It also promotes the creation of a safe and secure environment, and an integrated approach to infrastructure delivery.
- 9.7 **London Plan policy SD1 (Opportunity Areas)** identifies 'significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity'. This policy directs boroughs to encourage and deliver the growth potential of Opportunity Areas, support development which creates employment opportunities and housing choice, necessary social infrastructure and ensures it integrates into the surrounding area. As shown in Figure 13 below, which shows the London Plan Key Diagram, the Earls Court and West Kensington Opportunity Area (ECWKOA) is identified at the regional level, as a key mechanism in the delivery of the good growth objectives of the London Plan. This designation aligns with Local Plan policy FRA1 (Earls Court and West Kensington Opportunity Area), and, in turn, the inclusion of the ECWKOA within the wider Fulham Regeneration Area designated in Local Plan strategic policy FRA (Fulham Regeneration Area).

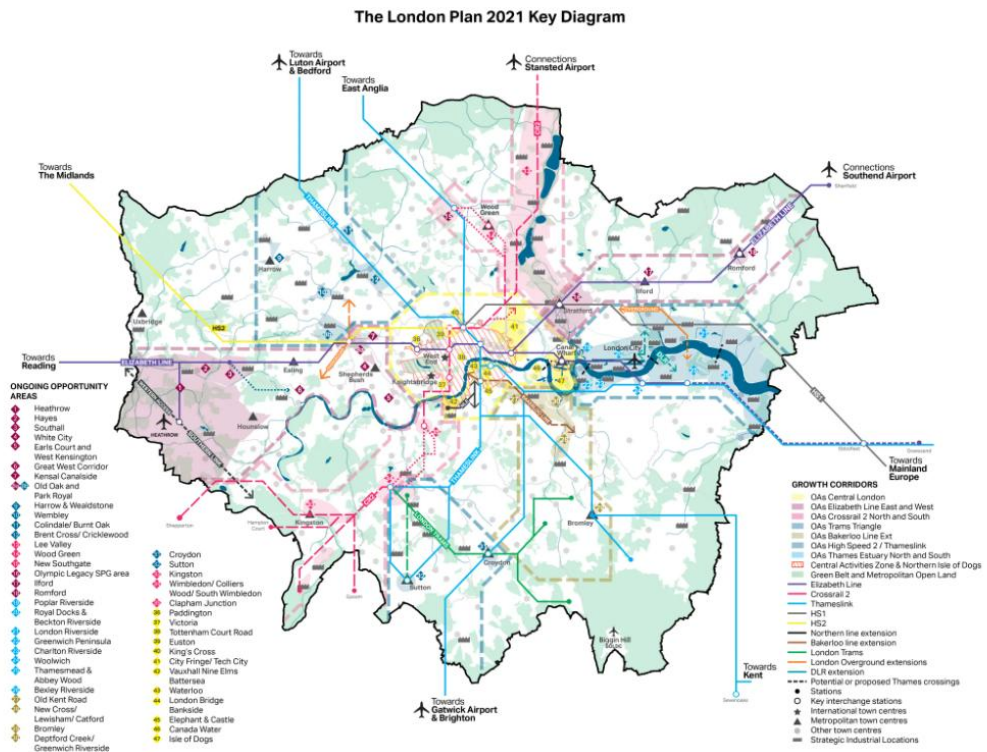


Figure 13: London Plan Key Diagram

- 9.8 Both the London Plan and Local Plan recognise that the site can accommodate significant growth in terms of new housing and employment opportunities, which is reflected in its policy designation as an Opportunity Area within a Regeneration Area. This is a reflection of the excellent public transport links of the site and its status as an underused brownfield site of considerable scale in a highly sustainable location.

Mixed use redevelopment

- 9.9 A comprehensive mixed-use, residential-led development including a quantum of office, commercial and cultural uses alongside community and other facilities including public realm and landscaping is proposed for this largely vacant, brownfield site within the ECWKOA.
- 9.10 The policies listed above identify Opportunity Areas such as this as being suitable for transformative intensification and delivery at scale of homes, economic opportunities, and the social infrastructure that supports good growth and delivers sustainable and inclusive regeneration.
- 9.11 In this case, consent is sought for a wide range of employment and other commercial and infrastructure uses which will sit alongside the delivery of a minimum yield of homes (including genuinely affordable homes at the point of delivery). Such an approach is considered to accord with the general policy objectives for Opportunity Areas, and the ECWKOA in particular, and is therefore acceptable in principle, subject to detailed assessment of the

proposals against the Development Plan, national planning policy and all other material planning considerations.

Note on flexibility and impacts on delivery

- 9.12 As noted above in section 4, the applicant seeks a significant degree of flexibility in relation to the uses proposed for the outline Development Plots. The wide range of variation in what can be delivered within the defined maximum volume and floorspace parameters results in a high level of uncertainty as to what will ultimately come forward on the site. If one land use comes forward in a building, another will not. This means that there are proposed land uses that may never be delivered on the site, and others, such as conventional residential accommodation falling within Use Class C3, which may only yield the minimum secured by way of the control documents (in this case, 2,000 dwellings, as set out in the Environmental Statement Report Addendum Chapter 4A Amended Development Description and LBHF Housing Statement Addendum). As such, conditions or a suitable legal mechanism to require minimum delivery should be considered if particular planning outcomes are desired.
- 9.13 The extracts below from parameter plan EC.PA.B Parameter Plan-012 rev P02 (Proposed Land Use Upper Levels) and the Development Specification illustrate the extent of flexibility sought by the applicant in respect of the principal proposed land uses of the outline plots.
- 9.14 To use Development Plot C as an example, the applicant seeks the flexibility to bring the upper floors (above ground level) forward for commercial, conventional housing falling within Use Class C3, hotel, educational, or other residential uses (including co-living and care home accommodation), or a mixture of these. Given that the maximum floorspace allowed within the Development Specification for these uses within Development Plot C add up to 147,000sqm but the maximum floorspace parameter for the Development Plot is set at 48,000sqm (including the ground floor), clearly, not all of these uses can be delivered.

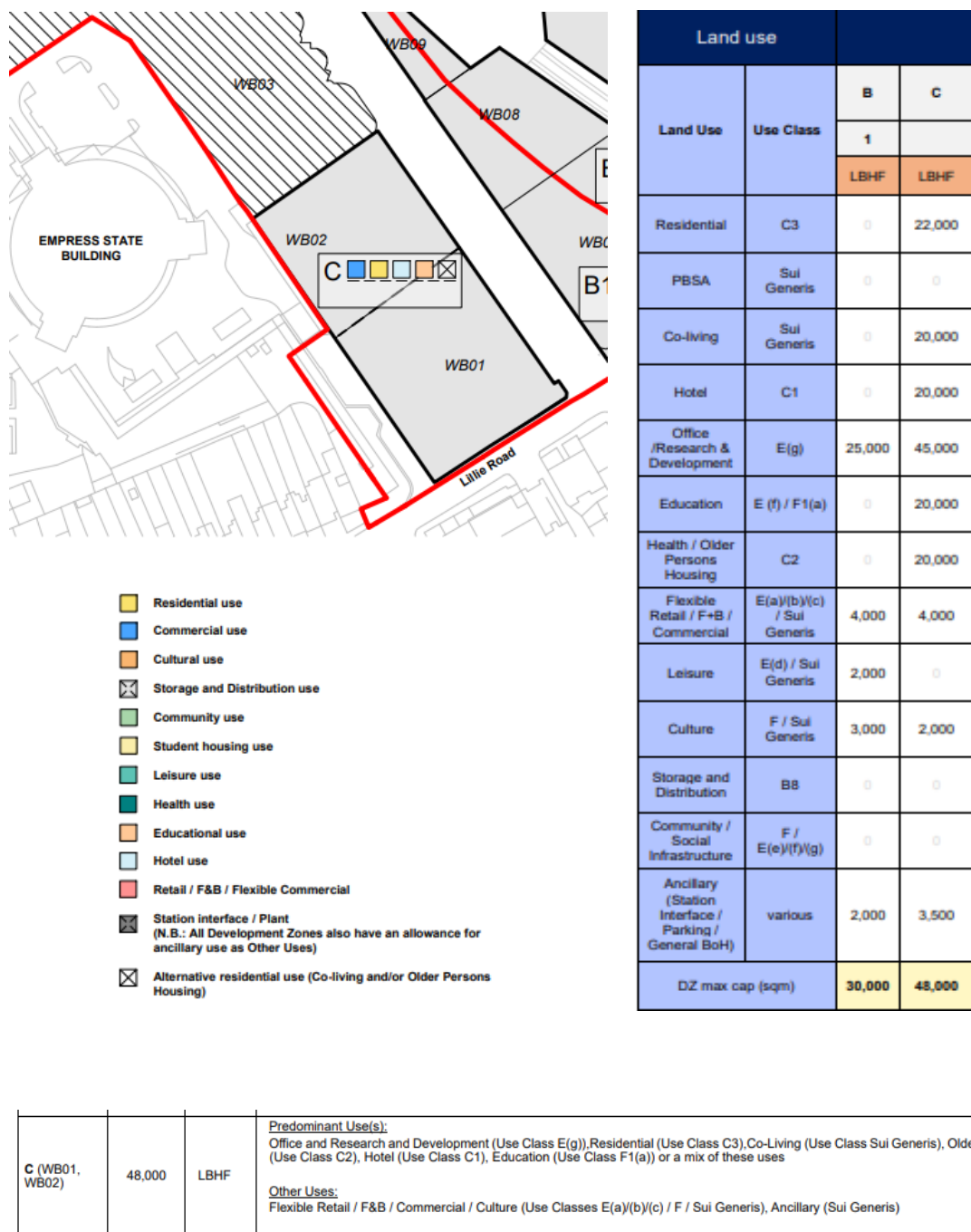


Figure 14: Development Plot C Floorspace and Land Uses Example

- 9.15 This illustrates the scope and limitation of the potential delivery of the different proposed land uses, as summarised below and elsewhere in the report, which should be considered. Although this example relates to a single plot, it is representative of the degree of flexibility sought across the site.
- 9.16 The uncertainty is increased by the proposed phasing, which anticipates an Early Phases scenario and an All Phases scenario, with the later phases corresponding to the land currently occupied by the Lillie Bridge Depot. Although the entirety of the site is within the ownership of the applicant, there is less certainty over the latter phases coming forward, for various reasons. In

the event that the latter phases are not delivered, the benefits accruing from the development proposals would be diminished when considered in comparison with the All Phases masterplan approach, as the floorspace and unit number yields would be substantially less.

- 9.17 The proposed land uses have to be considered in the context of the extent of flexibility sought across the site and within Development Plots, and also the possibility of an Early Phases only development being built out.

10 HOUSING

- 10.1 **NPPF paragraph 61** outlines the importance of a sufficient amount and variety of land coming forward where it is needed, delivery responding to local identified housing need whilst addressing the needs of groups with specific housing requirements (including an appropriate mix of housing types), and land with permission being built out without unnecessary delay, in order to achieve the Government's objective of significantly boosting the supply of homes.
- 10.2 **London Plan (2021)** policies focus on optimising brownfield sites, particularly for new housing development, removing the restrictive density matrix and placing the emphasis on design-led sustainable development. The following strategic policies are considered most relevant to the application in respect of housing delivery.
- 10.3 **Policy GG2 (Making the Best Use of Land)** states that to create successful sustainable mixed-use places which make the best use of land the development of brownfield sites, particularly those located in Opportunity Areas and that are well-connected by public transport routes, should be enabled. Policy GG2 encourages the intensification of the use of land to support additional homes.
- 10.4 **Policy GG4 (Delivering the Homes Londoners Need)** sets out the criteria that must be addressed in order to create a housing market that works better for all Londoners. This includes:
- ensuring that more homes are delivered; and
 - supporting the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable; and
 - deliver good quality homes that meet high standards of design and provide for identified needs (including specialist housing); and
 - encourage ambitious, achievable build out rates through the use of incentivising build-out milestones.
- 10.5 **London Plan policy H1 (Increasing Housing Supply)** sets out annualised housing targets for London Boroughs for the 10-year period ending 2028/29, with a strategic target to deliver 64,935 homes in London per annum during this period. The Borough of Hammersmith & Fulham has been assigned a 10-year housing target of 16,090. To optimise the potential for housing delivery, the Plan promotes delivery of housing on a variety of site types, including Opportunity Areas. This aligns with **London Plan policy SD1 (Opportunity Areas)**, which identifies Earls Court as an Opportunity Area with a potential indicative capacity

of up to 6,500 homes and more generally supports the delivery of housing on designated Opportunity Area sites in order to realise the regeneration and growth ambitions for such sites.

- 10.6 **Local Plan policy HO1 (Housing Supply)** states that the Council would work with partner organisations and landowners to exceed the London Plan (2016) minimum target of 1,031 additional dwellings a year up to 2025 and to continue to seek at least 1,031 additional dwellings a year in the period up to 2035. It adds that new homes to meet London's housing need will be achieved by a number of measures, including the development of strategic sites such as this.
- 10.7 The London Plan identifies the provision of genuinely affordable housing as a key strategic issue for London which is to be achieved through making efficient use of land. Accordingly, **London Plan policy H4 (Delivering Affordable Housing)** sets out the strategic target for 50% of all new homes to be genuinely affordable, and specific aims to achieve this, including the threshold approach, use of grant, and increased targets for development on publicly owned land.
- 10.8 **Local Plan policy HO3 (Affordable Housing)** sets out the LBHF policy requirement in respect of affordable housing delivery, specifying a borough-wide target of 50% affordable housing on all sites capable of a total housing yield of 11 or more dwellings, with a preferred tenure mix of 60% social or affordable rental and 40% intermediate within the affordable housing offer, subject to site-specific circumstances including scheme viability.
- 10.9 **London Plan policy H4 (Delivering Affordable Housing)** also requires that affordable housing should be provided on site, with off-site delivery or payments in lieu only considered as alternatives in exceptional circumstances.
- 10.10 **London Plan policy H6 (Affordable Housing Tenure)** sets out the preferred tenure mix for affordable housing across London as being a minimum of 30% low-cost rented homes, a minimum of 30% intermediate products (including London Living Rent and London Shared Ownership), with the remaining 40% to be determined by the borough as either low-cost rented homes or intermediate products, based on identified local need. In the case of LBHF, this is determined by **Local Plan policy HO3 (Affordable Housing)** which specifies a mix of 60% social or affordable rented homes and 40% intermediate products. Notwithstanding this, **London Plan policy H6 (Affordable Housing Tenure)** makes the Fast Track Route available for proposals that deliver low-cost rented homes in place of intermediate products subject to the relevant minimum overall affordable housing thresholds being reached (in this case, 35%).
- 10.11 **London Plan policy H10 (Housing Size Mix)** encourages the provision of a range of dwelling sizes in the interests of addressing the varied needs of the population and delivering mixed and inclusive neighbourhoods, having regard to local evidence of need and the nature and location of sites and the specific characteristics of individual schemes. **Local Plan policy HO5 (Housing Mix)** sets out a more granular preferred housing mix, which responds to evidenced

local need. The specifics are discussed in the context of the current application below.

- 10.12 All Development Zones of the proposal within LBHF other than B1, G1, I, P and Y would have the potential to provide new homes falling within Use Class C3, alongside other forms of residential accommodation and/or workspace, retail and leisure uses. The application seeks consent to deliver an unspecified amount of the Use Class C3 floorspace as Build to Rent (BtR), which could be delivered as either market or intermediate affordable housing (discount market rent), in which case **London Plan policy H11 (Build to Rent)** will apply, which sets out criteria relating to ongoing management and delivery (in the case of the affordable element).
- 10.13 The application seeks consent for a variety of housing types alongside conventional Use Class C3 dwellings, including purpose-built student accommodation (PBSA) (sui generis) and co-living (shared living) accommodation (sui generis), as described in the Development Specification. These can make a valuable contribution to the local housing offer, and in the case of PBSA and co-living accommodation would also make a contribution to affordable housing.
- 10.14 As submitted, within the LBHF detailed plots, WB03 would provide purpose-built student accommodation (PBSA), whilst WB04 and WB05 would provide conventional Use Class C3 accommodation. The picture is less clear in relation to the uses proposed for the outline phases, as set out in above.
- 10.15 In addition to the PBSA proposed within the detailed phase, further PBSA is allowed for across the outline phases in LBHF within Development Zones T and V1, up to a maximum floorspace of up to 38,000sqm (equating to up to 1,500 PBSA bedspaces across the detailed and outline phases within LBHF). The maximum floorspace cap for PBSA floorspace sought in respect of the outline phases across the boroughs is equal to the amount sought (40,000sqm, of which 2,000sqm is within RBKC), so whilst other land uses may be brought forward in preference to PBSA by the developer, if PBSA is chosen as a preferred land use to bring forward at the appropriate RMA stage, the entirety of the floorspace proposed can potentially come forward.
- 10.16 Co-living accommodation is also allowed for across the outline phases in LBHF within Development Zones C, T, V1 and W, up to a maximum floorspace of up to 48,000sqm. As with the case of PBSA when assessed across the two boroughs, the maximum floorspace cap for co-living accommodation is the sum of the total floorspace sought for the two boroughs (50,000sqm, of which 2,000sqm is within RBKC).
- 10.17 There are also specific Development Plan policies relating to delivery of student accommodation. **London Plan policy H15 (Purpose-built Student Accommodation)** sets out criteria for proposals primarily in terms of need and ensuring that such accommodation is secured for its intended purpose, as well as establishing the requirements for delivery of affordable student accommodation (which follows the same level and thresholds for fast track as

conventional housing falling within Use Class C3). Alongside this, **Local Plan policy HO9 (Student Accommodation)** sets out parameters in relation to local impacts such as amenity and loss of existing housing, as well as quality and accessibility of accommodation, and identifies the ECWKOAs as being suitable for student accommodation. Both policies require locations for student accommodation to be well connected to public transportation.

- 10.18 **London Plan policy H15 (Large-scale purpose-built shared living)** describes the criteria by which co-living developments are assessed.
- 10.19 In addition to these housing focussed London Plan and Local Plan policies, additional planning guidance in respect of housing delivery is set out in the GLA's relevant planning policy guidance, as follows. The **Housing Design Standards LPG (2023)** provides further guidance on relevant London Plan policies and sets out the principles that flow from them. In terms of housing delivery, one of the key principles is A2.2 which requires that the mix of dwelling types reflects strategic and local need, and recognises the importance of mixed and inclusive communities, stating that large developments such as this should provide a wide range of housing tenures and typologies, and respond to specific local needs including specialist housing types.
- 10.20 The principles set out within section A5 (inclusion and accessibility) require the highest level of inclusivity in the design of developments, to ensure that proposals provide domestic environments that are suitable for all, and tenure blind, set within public environments that are safe, welcoming, accessible and usable for and by all members of the community.
- 10.21 The **GLA's Housing SPG (2016, amended 2017)** sets out the delivery expectations for housing supply, quality and choice. The guidance reiterates the importance of meeting and where possible exceeding the identified housing targets and identifies Opportunity Areas as having a crucial role in driving overall housing delivery.
- 10.22 The guidance defines "optimisation" of housing potential and emphasises that this should result in the provision of good quality, attractive housing that meets local needs in respect of tenure type (including specialist housing) and dwelling size and ensuring the most efficient use of land to do so.
- 10.23 Opportunity Areas are identified within the Housing SPG as being expected to accommodate substantial capacity for new development, including delivery of housing, reiterating that the indicative site capacities should be used as a starting point to be exceeded where possible, potentially as a result of being capable of accommodating higher densities and taller buildings than elsewhere, stating that "optimising housing potential in these locations is considered to be a strategic priority".
- 10.24 The **GLA's Affordable Housing and Viability SPG (2017)** stands alongside, and amends, the Housing SPG referenced above. The guidance sets out the approach taken to viability in terms of both the threshold approach and viability assessments and provides a specific approach for Build to Rent Schemes.

10.25 Policies relating to PBSA and co-living are supported by the **Mayor of London's Purpose-built Student Accommodation LPG (2024)** and **Large-scale Purpose-built Shared Living LPG (2024)** respectively.

10.26 The **GLA's Accelerating Housing Delivery Practice Note (2024)** postdates the SPGs noted above and was published in response to challenging market conditions over the last few years, which have seen a London wide slowdown in housing delivery. The Practice Note puts forward various mechanisms aimed at accelerating housing delivery within London, including the relaxation of affordable housing delivery thresholds where affordable housing is delivered primarily as social rent and where the social rent provision is the equivalent to the relevant affordable housing threshold level at the local plan tenure split, known as "equivalency".

Threshold Approach to Housing Delivery and Fast Track Route

10.27 The threshold approach is set out in **London Plan policy H05 (Threshold Approach to Applications)**, which applies to all major development proposals. The threshold levels are set at (1) a minimum of 35% or (2) 50% on public sector land where there is no portfolio agreement with the Mayor. Where the threshold levels are met, proposals may qualify for the Fast Track Route, namely that financial viability is not required to be assessed in detail, and that planning permissions are not subject to mid- and late-stage review mechanisms during their build-out.

10.28 The site is almost entirely private, the northern part of the site within LBHF (the later phases [5, 6, 7 and 8, comprising Development Plots WK01 – WK12 inclusive]) having been purchased by the applicant from TfL in November 2022.

10.29 However, it constitutes public sector land for the purposes of applying policy **London Plan policy H5 (Threshold Approach to Applications)** because the site has been recently disposed of by a public-sector landowner for the purposes of development.

10.30 The affordable housing threshold therefore falls to be considered based on how the Lillie Bridge Depot land sits within the wider TfL portfolio agreement with the Mayor¹. As 50% affordable housing will be delivered across the wider portfolio, the reduced 35% threshold applies to the Lillie Bridge Depot, and therefore across the site as a whole.

10.31 As the site is proposed to achieve delivery of 35% affordable housing across the relevant housing products, the proposals therefore qualify to be considered for the Fast Track Route of the threshold approach, subject to the criteria set out in **London Plan policy H5 (Threshold Approach To Applications)**, namely (in this case) that it (1) meets or exceeds the relevant threshold level of affordable housing delivery without public subsidy, and (2) is consistent with the relevant tenure split, as specified in **London Plan policy H6 (Affordable Housing)**. **London Plan policies H11 (Build to Rent)** and **H15 (Purpose-built**

¹ GLA Stage 1 Planning Report ref GLA/2024/0499/S1 dated 11 November 2024

Student Accommodation) also apply, as setting out criteria on the delivery of affordable housing and the threshold approach within these housing types.

- 10.32 Where sites do not achieve the relevant criteria, applications are required to follow the viability tested route. A viability assessment has been submitted in support of the application. This has been scrutinised by independent assessors on behalf of both LBHF and RBKC, as well as the GLA Planning Viability Team.
- 10.33 In this case, the applicant has successfully applied for public subsidy, and the proposed tenure split does not comply with the requirements of London Plan policy H6 (Affordable housing tenure) insofar as the proposed tenure split of 60% intermediate to 40% social and affordable rent, does not accord with the Council's preferred split of 60% social and affordable rent, to 40% intermediate housing types. The below target proportion of social and affordable rental products has been justified on the basis of scheme viability.
- 10.34 However, notwithstanding these matters, the Council has discretion in relation to the tenure split in particular, and given the wider, challenging environment for delivery at the current time, has chosen to take a flexible approach. Similarly, as the GLA, in its Stage 1 report, has recognised that the scheme potentially qualifies for FTR subject to the agreement of the Local Planning Authority, it is concluded that at regional level a flexible approach to the issue of public subsidy is also being taken.
- 10.35 For these reasons, it is considered that the Council should exercise its discretion in favour of allowing the application to follow the FTR and therefore shall not be subject to mid and late-stage reviews, subject to any conclusions to the contrary in the GLA's Stage 2 report.

Housing Delivery

- 10.36 Residential use is a priority land use for the Council. This is reflected in **Local Plan policy HO1 (Housing Supply)** which targets delivery of at least 1,031 new homes per year up to 2035 and seeks to ensure that housing forms a component of all regeneration schemes. This sits alongside **Strategic Site Policy FRA1 (Earls Court and West Kensington Opportunity Area)**, which identifies the Earls Court site as being suitable for a phased mixed use, residential-led redevelopment, with expected housing yields being aligned with those set out in the London Plan 2016 (now superseded by those in the London Plan 2021).
- 10.37 **London Plan policy H1 (Increasing London's Housing Supply)**, supported by **Table 4.1** targets the delivery of 16,090 new homes within LBHF in the 10 years up to 2029, while **London Plan Table 2.1** identifies the Earls Court and West Kensington Opportunity Area (ECWKO) as having a potential yield of 6,500 homes.
- 10.38 The proposed development would deliver up to 3,900 (Class C3) homes across the entirety of the site, with up to 2,500 homes allocated in LBHF and 1,400 homes in RBKC. These figures are based on the overall maximum quantum of residential floorspace sought in both boroughs: 460,000 sqm (GEA) of Class

C3 floorspace. The minimum and maximum housing yield proposed across the scheme is shown in terms of both overall numbers and floor areas (GEA) in Housing Table 1 below.

Housing type	Detailed	Outline early phases		Outline later phases		Total outline		Grand totals (detailed and outline phases)	
		Min	Max	Min	Max	Min	Max	Min	Max
C3 residential – unit numbers	456	150	600	1,394	1,444	1,544	2,044	2,000	2,500
C3 residential – GEA m ²	55,143	24,000	45,000	152,000	190,000	176,000	235,000	231,143	290,143
RBKC									
C3 residential – unit numbers	310	740	1,090	Not applicable		740	1,090	1,050	1,400
C3 residential – GEA m ²	40,246	85,000	130,000	Not applicable		85,000	130,000	125,246	170,246

Housing Table 1: Residential quantum

- 10.39 The figures above are predicated on the phases being delivered in their entirety across the lifetime of the build out. The reason for the significant degree of variation between minimum and maximum yields is due to the extent of flexibility in land uses that the applicant is seeking. For example, within Development Plot WK05, the ground floor uses could comprise residential, commercial, educational, cultural, storage and distribution, retail including food and beverage (or other flexible commercial), health, or community uses, while the upper floor uses could include residential, commercial, educational or health related uses, or (in the case of both ground and first floor uses) a mixture of the stated uses.
- 10.40 It should also be noted that (as detailed above in Section 4 of this report) the proposed housing yield for LBHF is spread across the early and later phases, the later phases being located on land currently occupied by TfL (London Underground) as the Lillie Bridge Depot.
- 10.41 In comparison with the previous outline planning permission, which was primarily a residential-led scheme, the proposed development would increase the ratio of non-residential floorspace relative to the housing provision. The proposed development would also fall short of the delivery targets of new homes in the ECWKOA, as noted above. There are few opportunities existing to meet this target elsewhere within the Opportunity Area.
- 10.42 This increase in the ratio of non-residential floorspace relative to residential floorspace is driven both by the omission of the West Kensington estate from the red line boundary, and acknowledgement of the growing importance of delivering employment uses within the site, in line with the aspirations set out

in Upstream London, alongside the provision of housing and other non-commercial land uses such as culture. Both of these factors have a negative impact upon projected housing yield in comparison to the historic permission and the policy aspiration for housing delivery.

- 10.43 Notwithstanding the above, the proposed development would make a significant contribution towards the delivery of new homes in the ECWKO site, with the detailed component delivering a total of 766 homes (456 homes in LBHF and 310 homes in RBKC), with first occupation targeted by the end of 2030.
- 10.44 The outline component across the two boroughs includes a maximum 365,000sqm (GEA) of residential floorspace. This comprises up to 235,000 sqm (GEA) in LBHF (with a minimum of 176,000sqm) and 130,000 sqm (GEA) in RBKC (with a minimum of 85,000sqm). Within the outline component, the maximum floorspace is predicted to accommodate up to 3,128 homes (2,038 homes in LBHF), depending on final residential mix and how the flexibility on residential and non-residential land uses is applied and ultimately delivered across the site. These dwellings are in addition to those delivered in the detailed phases.
- 10.45 Of the outline component, up to 600 homes (with a backstop of a minimum of 150 dwellings) would potentially be delivered in LBHF within the Early Phases (in addition to the 456 homes delivered within the detailed phase), with the remaining balance of up to 1,444 dwellings (with a minimum of 1,394) to be delivered in the All Phases scenario. In comparison with the All Phases development, the Early Phases scenario (including the detailed component) would provide up to 1,056 dwellings in LBHF.
- 10.46 In terms of **Local Plan policy HO1 (Housing supply)**, the detailed component would provide 44% of one year's annual housing target. In the event that all phases of development within LBHF are delivered to the maximum in respect of housing, the yield would achieve 15.5% of LBHF's 10-year housing target of 16,090 homes as set by the London Plan. The applicant has agreed to the inclusion of minimum dwelling numbers for delivery in respect of the outline components, safeguarding delivery of a minimum of 2,000 dwellings across all phases which would equate to 12% of the 10- year housing target.
- 10.47 In either case, this would make a very substantial contribution towards meeting local and strategic housing targets which would accord with both **Local Plan policy HO1 (Housing Supply)** and **London Plan policy H1 (Increasing London's Housing Supply)**, while safeguarding the flexibility to provide employment floorspace across the site.
- 10.48 To ensure an appropriate yield of residential accommodation within each outline phase, a condition/legal mechanism specifying the minimum quantum of residential development within each outline phase and a trigger for delivery of affordable dwellings linked to occupation of market dwellings is recommended.

Affordable Housing and Viability

- 10.49 **Paragraph 64 of the NPPF** states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and sets out the expectation that need should be met through onsite delivery.
- 10.50 **London Plan Policy H4 (Delivering Affordable Housing)** sets a strategic target for 50% of all new homes to be affordable. TfL has a portfolio agreement in place with the Mayor of London to deliver 50% affordable housing across its programme of development and disposal sites. This allows for flexibility in respect to individual sites, with the requirement to come forward meeting the 35% affordable housing threshold to be eligible for the Fast Track Route set out in London Plan Policy H5.
- 10.51 As submitted, the affordable homes within the conventional Use Class C3 yield will comprise a mix of social rent, intermediate for rent and intermediate for sale affordable housing tenure products, which will be delivered as genuinely affordable at the point of delivery. The proposed quantum of 35% (by habitable room) and affordable housing proportion and tenure mix (40% social rent and 60% intermediate products including intermediate rent and shared ownership) has been informed by a viability review process, which indicates a substantial deficit as discussed below and the proposed housing unit size and tenure mix has been discussed with the Council and GLA. Alongside this, the Applicant has engaged with Registered Providers (“RPs”) of affordable housing and the GLA in relation to the availability of grant funding.
- 10.52 Across the detailed phase within LBHF, the affordable housing offer within the conventional Use Class C3 provision would represent 39% by unit (178 dwellings within Buildings WB01 T1 and WB05 T2), with an affordable tenure split of 64% social rent and 36% intermediate (by unit), as shown below in Housing Table 2 below. This translates to affordable housing provision of 35% by habitable room with a tenure split of 60% intermediate and 40% social rent. As such, affordable housing across a range of tenure types will be delivered from the earliest phase of delivery, which is welcomed.

EC2		UNITS					HAB ROOMS				
Tenure		Studio	1-Bed	2-Bed	3-bed	Total	Studio	1-Bed	2-Bed	3-bed	Total
Private		23	198	185	45	450	23	396	554	180	1,152
Intermediate		0	75	75	0	149	0	149	224	0	373
Social Rent		0	19	20	30	69	0	37	60	151	249
Total		23	291	279	75	668	23	582	837	331	1,773

% MIX		UNITS					HAB ROOMS				
EC2		Studio	1-Bed	2-Bed	3-bed	Total	Studio	1-Bed	2-Bed	3-bed	Total
Private		5%	44%	41%	10%	67%	2%	34%	48%	16%	65%
Intermediate		0%	50%	50%	0%	22%	0%	40%	60%	0%	21%
Social Rent		0%	27%	29%	44%	10%	0%	15%	24%	61%	14%
Total		3%	44%	42%	11%	100%	1%	33%	47%	19%	100%

Housing Table 2 Affordable housing delivery – detailed phase component

- 10.53 The predicted Use Class C3 housing affordable housing yield of the outline phases is 34% by unit, with an affordable housing tenure split of 35% social rent and 65% intermediate (by unit) as shown in Housing Table 3 below, based on a maximum housing yield of 2,500 dwellings across the whole site.

Tenure type	1 bed		2 bed		3bed		4 bed		Total
Social and affordable rent	58	6%	63	8%	119	54%	0	0%	240 (12%)
Intermediate	237	23%	184	23%	21	26%	0	0%	442 (22%)
Market	734	71%	541	67%	81	5%	0	0%	1,356 (66%)
Total	1,029 (51%)		788 (39%)		221 (11%)		0		2,038 (100%)

Housing Table 3: Affordable housing delivery – outline phases component

- 10.54 This would result in a blended delivery of 34% affordable housing by unit number across the entirety of the site, with an affordable housing split of 41% social rent and 59% intermediate by unit number. This is calculated by the applicant to represent 35% by habitable room on the basis of the proposed housing size mix, although this will be dependent on the mix coming forward in detailed plots, which there is a considerable amount of flexibility over at the current time. This prediction is consistent with the skew of larger dwellings coming forward as affordable properties. The applicant has agreed to triggers securing 35% affordable housing across all residential phases of development throughout the entirety of the build out. This will ensure consistent provision of affordable housing in line with the expectations flowing from the proposed offer, which is welcomed. Delivery of a satisfactory level and size mix of affordable housing across the various tenure types, including reconciliation across the build out to ensure the delivery of mixed, sustainable communities by way of the submission of an Affordable Housing Delivery Plan with each RMA, will be secured by way of a s106 legal mechanism.
- 10.55 Within the Use Class C3 housing offer in the outline phases, the applicant seeks flexibility to provide Build to Rent properties. The coming forward of housing on a build to rent basis, with the 35% affordable housing element provided as Discount Market Rent, is acceptable to both the Local Planning Authority and the GLA subject to a legal agreement including management covenant to safeguard the benefits that flow from delivery of this type of housing product. A clawback mechanism is not required in this case as Build to Rent was not included in the FVA valuation.
- 10.56 In respect of other housing products, the affordable component of the PBSA yield is proposed to represent 35% of the overall yield of bedspaces, which accords with **London Plan policy H15 (Purpose-built Student Accommodation)**. It is understood that a Memorandum of Understanding in respect of the nomination rights for occupation has been signed with a key local higher education provided in respect of the PBSA proposed within the detailed phases. As with the conventional housing, a S106 agreement is required to secure the affordable student accommodation component.

- 10.57 The co-living (sui generis) component of the housing offer, by virtue of its shared living characteristics which do not fall within the scope of “dwellings” or accord with the minimum space standards or allow for an appropriate size mix, does not lend itself to delivery of in kind affordable housing, despite the policy requirement to make a contribution toward affordable housing delivery. The mechanism proposed by the applicant is to deliver the affordable housing requirement generated as conventional affordable housing elsewhere within the site, on the basis of 35% of the co-living floor area equivalent (including communal areas). Whilst this does not strictly align with **London Plan policy H16 (Large-scale Purpose-built Shared Living)** which specifies an equivalent financial contribution in lieu to be made, the LPG allows for this as an alternative, and providing that this contribution is delivered as additional to the 35% conventional residential offer, this is acceptable in the circumstances of this case, subject to agreement of the details of how the quantum of the contribution is to be calculated and its equivalency as conventional housing, and its delivery within the development and in relation to the co-living space.
- 10.58 The application includes the provision of specialist older persons accommodation falling within Use Class C2 (residential institutions). This is not considered in regulatory or policy terms as a conventional housing type, and as such does not incur any requirement for an affordable housing contribution. This land use is considered in more detail under non-residential land uses.
- 10.59 The affordable housing offer of 35% across the qualifying product types is supported by a detailed Financial Viability Assessment (FVA), notwithstanding the fact that the application has been submitted on the basis that in the applicant’s view, the proposed development should be considered as qualifying for the FTR. Applications which do not meet the FTR requirements should follow the Viability Tested Route, with a Financial Viability Appraisal (FVA) submitted and schemes subject to both early and late-stage review mechanisms, with mid-stage reviews also required on larger phased schemes of this size and scale.
- 10.60 An independent review of the applicant’s FVA, including updates and supporting evidence, has been undertaken by BPS on behalf of LBHF in order to scrutinise whether the application delivers the maximum reasonable level of affordable housing.
- 10.61 There remain some outstanding matters of disagreement between the applicant’s viability consultant and BPS, primarily relating to the benchmark land value, intermediate housing product values, and profitability of the illustrative scheme. However, notwithstanding these, the independent review exercise has concluded, subject to the limitations of the information provided and in line with the findings of the submitted viability information, that the proposed development is currently unviable. Moreover, the review has concluded that the amount of affordable housing that the applicant has undertaken to provide across the site (35% by habitable room) is well in excess of the maximum reasonable that would typically be justified based on the demonstrated viability position alone.

- 10.62 As it is considered that the scheme should be subject to the and there is agreement that the scheme is unviable by a substantial margin regardless of which assessment is used, it is not necessary to reach final agreement on the outstanding points. The absence of viability reviews on the FTR means that agreed values are not required to benchmark the review process. However, in order to safeguard the position of the Council in the event that viability improves going forward, key viability inputs are required to be agreed, including profit margin and benchmark land value in order to establish a reliable baseline for any future viability exercise to be pegged to. These discussions are ongoing between the Council and the applicant.
- 10.63 It is acknowledged that the proposed development is financially challenging by reason of site-specific challenges including the delivery of infrastructure complex site constraints, as well as the wider economic environment. It is welcomed that, despite these challenges, the Applicant has committed to enabling the delivery of 35% affordable housing by habitable rooms across the wider site. This would be delivered as 178 affordable homes within the detailed phase, up to a further 200 homes within the early outline phases, and up to 482 within the later outline phases. This constitutes delivery of up to 860 affordable homes in the borough to meet local need (1,339 affordable homes across both boroughs).
- 10.64 This level of affordable housing delivery represents a substantial public benefit. Although the quantum of delivery will vary depending on the stage of the build out, with less being delivered in the detailed component than would be at the completion of the Early Phases and All Phases scenarios, 35% delivery across all phases is a positive planning outcome, subject to triggers ensuring consistent delivery of the 35% at an appropriate tenure and size mix of affordable housing across the scheme, and these being secured by way of an appropriate legal mechanism.
- 10.65 Given that this offer exceeds the maximum amount of affordable housing that the development can viably sustain, which has been confirmed through the independent review process, the offer of 35% affordable across the site and all qualifying tenure types is acceptable. This conclusion is supported by the GLA.
- 10.66 Notwithstanding the above, since the submission of the application in summer 2024, the GLA Practice Note has come into effect. Whilst this does not have the same status as adopted planning policy, such as the LBHF Local Plan and London Plan, it is a material consideration of some weight. Among the measures put forward within the Practice Note is a mechanism to allow schemes to follow the fast track route (FTR), i.e. not require mid-term or late-stage viability reviews, at a lower threshold than required by London Plan policy H5 (35%), where the social rent provision is the equivalent to (or higher than it would be at) the London Plan threshold level if delivered in accordance with a policy-compliant local plan tenure split, in this case, 60 social rent to 40 intermediate products as set out in **Local Plan policy H03 (Affordable Housing)**.

- 10.67 As an example of how this could operate in the circumstances of this case, the application of equivalency in respect of the detailed phases could potentially result in a reduced number and proportion of dwellings available as affordable housing within Phase 1, but an increase in the number of dwellings available for social rent, and an uplift in the proportion of social rent within the affordable offer.
- 10.68 As set out above, this is not the basis on which the current application has been submitted, but in the evolving national and regional policy context in respect of affordable housing delivery, providing that all relevant criteria are satisfied and subject to robust scrutiny of the detailed proposals, the principle of applying the equivalency mechanism may be acceptable going forward, subject to the detail of the proposal and securing it within an appropriate s106 legal mechanism.

Density

- 10.69 **London Plan Policy D3 (Optimising Site Capacity Through the Design-led approach)** requires that all development proposals make the best use of land by following a design-led approach to determine the most appropriate form and scale of development for a site. Rather than prescribing fixed density ranges, the policy emphasises a contextual and qualitative assessment of each site's capacity. Aligned with this is **London Plan policy GG2 (Making the Best Use of Land)** which recognises the potential of intensifying the use of land, including through higher density development, to support the delivery of homes and workspaces.
- 10.70 The London Plan (2021) does not include a Density Matrix, unlike earlier versions of the document, instead favouring a design-led approach. This sees density as an output and not as an input that should determine the form and type of new development.
- 10.71 The density proposed has been assessed in Section 12 in respect of how it is expressed in terms of heights, scale and massing, and is considered appropriate, having regard to the site-specific constraints and proximity to public transport, in accordance with the aims of **London Plan policy D3 (Optimising Site Capacity Through the Design-led Approach)**.

Housing Mix

- 10.72 **The NPPF** requires local planning authorities to deliver a wide choice of high-quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand.
- 10.73 **London Plan Policy H10 (Housing Size Mix)** considers that schemes should consist of a range of unit sizes and should seek to deliver mixed and inclusive neighbourhoods. The policy further acknowledges the role that an appropriate housing mix can play in optimising the housing potential on sites. The supporting policy text recognises that well-designed 1 and 2- bed units have an important function as they can attract those wanting to downsize from their existing homes and free up existing family housing stock.

- 10.74 **Local Plan Policy HO5 (Housing Mix)** sets out the housing mix for each main tenure type (market housing, social and affordable rented housing, and intermediate housing), which developments should aim to meet, as shown in table * below, subject to consideration of viability, locational characteristics and site constraints.

Housing type	1 beds	2 beds	3+ beds
Social and affordable rent	10%	40%	35% (of which 15% should be 4+ beds)
Intermediate	50%	35%	15%
Market	A mix of unit sizes including larger family accommodation		

Housing table 5: housing mix

- 10.75 The housing size mix proposed for the detailed component within LBHF is shown in Housing Table 5 above.
- 10.76 The housing mix proposed for the detailed component does not strictly align with that set out in **Local Plan Policy HO5 (Housing Mix)**, however the social and affordable rent proportion is skewed towards 2 and 3 beds, with a greater proportion of smaller units being provided as intermediate dwellings, which is a positive response to identified demand within the borough. The market contribution provides a mix of dwelling sizes which includes accommodation suitable for occupation by family groups, which is acceptable.
- 10.77 Whilst there are no 4 bed units proposed, this conforms with **London Plan policy H10 (Housing Size Mix)** which recognises that a higher proportion of one and two bed units may generally be more appropriate in locations with higher public transport access and connectivity, such as this.
- 10.78 Overall, the proposed housing size mix proposed for the detailed phase within LBHF is acceptable.
- 10.79 The housing mix proposed for the outline phases is expressed as a percentage range given the nature of the proposals, which do not allow for the specifics to be known at the current time (as shown below in Housing Table 6) and will be provided and assessed in detail at the reserved matters stage for each relevant phase of development. Reconciliation statements will be required in support of all reserved matters applications to track delivery and ensure that the minimum requirements for the agreed housing mix are met, in the interests of the delivery of mixed, sustainable communities across the outline phases.

Tenure	Studio	1 Bed	2 Bed	3 Bed	4 Bed
Social Rent	0%	20-30%	20-30%	40-45%	0-10%
Intermediate	0-10%	40-50%	35-45%	0-10%	0-10%
Market	5-12.5%	30-50%	30-50%	5-20%	0-10%

Housing Table 6: housing mix by percentage

- 10.80 The proposed housing mix for the outline phases does not align with LBHF's preferred housing mix in respect of either social and affordable rent or intermediate housing products, however it is consistent with the proposals for the detailed phases, and responds accordingly to the borough's evidenced

need, particularly in relation to the demand for larger social and affordable rented homes and smaller intermediate homes. The proposed ranges allow some flexibility, which is welcomed.

- 10.81 Overall, the proposed housing size mix proposed for the outline phases within LBHF is acceptable, subject to agreement of an appropriate legal mechanism specifying the intended housing size mix across the outline phases, and requiring the submission of reconciliation statements at reserved matters application stages to manage delivery and ensure the evolution of mixed, sustainable communities within the development.

Standard of Housing Accommodation

- 10.82 Housing quality is a key consideration in the assessment of applications for new developments. **London Plan Policy D6 (Housing Quality and Standards)** requires all new dwellings to have 'high quality design and adequately sized rooms' in line with space standards, alongside functional layouts, adequate daylight and sunlight, natural ventilation, and access to external amenity space. This is reinforced in **Local Plan Policy HO4 (Housing Quality and Density)**.
- 10.83 The Mayor's **Housing SPG (2016)** and **Housing Design LPG (2023)** make clear that a key priority is to 'improve standards for the quality and design of housing, making sure that homes meet the needs of a changing population throughout their lives and are built to the highest environmental standards'. New housing should meet best practice standards for designing homes and associated communal spaces that function well for occupiers and are flexible enough to meet the changing needs of occupiers over time.
- 10.84 The London Plan policies are consistent with those of the Local Plan, including **Local Plan Policy DC2 (Design of New Build)** which states that all proposals for new residential development must be designed to respect the principles of residential amenity and accessible and inclusive design. **Local Plan Policy HO11 (Detailed Residential Standards)** sets out several criteria which should be taken into account to ensure that the design and quality of all new housing is of a high standard, meets the needs of future occupants and respects the principles of good neighbourliness.
- 10.85 Both **London Plan Policy D6 (Housing Quality and Standards)** and **Local Plan Policy HO11 (Detailed Residential Standards)** (supported by the **LBHF Planning Guidance SPD Key principle HS2 (Standards)**) require proposals to achieve the Nationally Described Space Standards.
- 10.86 **London Plan Policy D6 (Housing Quality and Standards)** states that a minimum of 5 sqm of private outdoor space should be provided for each 1- 2- person dwelling, plus an additional 1sqm for each additional occupant. **Key principle HS1 (Amenity Space) of the LBHF Planning Guidance SPD** states the Council would expect to see a more generous provision of outdoor amenity space than the minimum provision standards.
- 10.87 The dwellings proposed within WB04 and WB05 fall within the definition of Use Class C3 housing and therefore fall to be considered under the policies and

standards listed above. WB03 contains only PBSA and therefore is considered separately below. At this stage there is limited information available for the residential accommodation proposed in the outline phases. Any detailed proposals coming forward at RMA stage will be considered in full against Development Plan policy at that point in time.

- 10.88 Notwithstanding the above, the residential accommodation proposed in the detailed phase (Development Zone H) fall to be assessed in full within the scope of the current application. All residential units within the two residential blocks would meet or exceed the Nationally Described Space Standards and are thereby compliant with the relevant Development Plan policies in that regard.

WB04

- 10.89 WB04 takes the form of a slender tower and provides 100% market housing. The form of the building and its floorplan layouts, which feature a central core and eroded corners to allow for dual aspect dwellings and partially recessed balconies, maximises the opportunities to create homes with a good level of outlook and natural ventilation. Although a significant proportion (50%) of the WB04 internal residential layouts do not meet the definition of fully dual aspect homes as set out in the Mayor's Housing Design LPG (2023), the layouts are such that all of the dwellings benefit from primary living spaces that are meaningfully dual aspect, and the parts of the homes that derive less benefit from the dual aspect are typically kitchen areas or non-habitable spaces, as shown in figure 15 below.
- 10.90 The layouts are rational, and accommodation is stacked to minimise conflicts between areas of different activities within adjacent properties. All dwellings have private amenity space which in most cases will be accessed from the primary living area but will also provide shading to bedrooms. Of 278 dwellings within WB04, 178 will have balconies, 6 a terrace, 89 an internal amenity area and 5 will benefit from direct access to the podium terrace. The approach of providing internal amenity space to some properties is driven by wind microclimate effects which generally apply at height, although some properties at lower levels on the windward (southwest) of the building also require this mitigation. Overall, the quality of the internal layouts is considered acceptable.

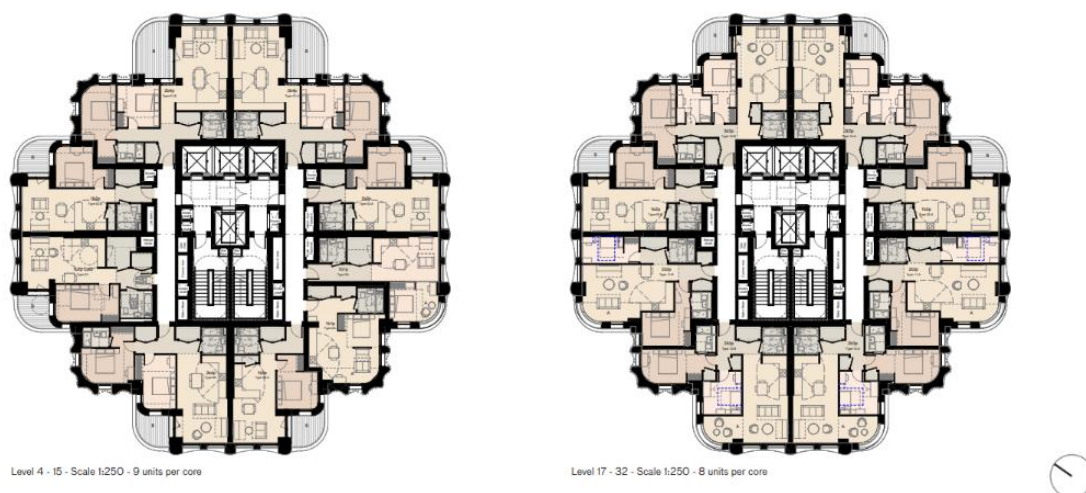


Figure 15 proposed floor plan

- 10.91 The cores serve 9 homes per core at levels 2 – 15 (inclusive) and 8 homes per core at levels 16 – 32 (inclusive), reducing to 4 or less at levels 33 – 28 (inclusive). The cores do not benefit from natural light or ventilation due to their location at the centre of the building. However, they are efficiently planned with the corridor lengths each side of the lift core serving a maximum of 5 homes, giving opportunity for a sense of neighbourliness. This approach maximises the use of the external faces of the building for habitable accommodation. Overall, in the circumstances of this case, a flexible approach to the application of the guidance set out in the Mayor of London's Housing Design LPG is considered appropriate.
- 10.92 In addition to the private amenity spaces described above, a private communal amenity space would be located at second floor level for the exclusive use of residents of WB04. This would provide a landscaped area with seating and children's play space.
- 10.93 The entrance arrangements at ground floor level from Empress Place Boulevard have been carefully considered and will give a sense of arrival to the building. The lower and upper ground floors will also provide vehicular access, servicing and other resident facilities including a lounge and workspace, together with a commercial gym at first floor level. To safeguard the residential amenity of occupiers in relation to the commercial activities taking place at first floor, conditions are suggested requiring the submission and implementation of sound proofing (including anti-vibration) and hours of operation. Discussions are ongoing as to what would constitute appropriate controls on hours of operation, and an update will be provided in the addendum report .

WB05

- 10.94 WB05 provides solely affordable housing, with WB05 T1 having a yield of 120 intermediate homes and WB05 T2 a yield of 64 social rent homes. The form of the building is relatively conventional. However, as with Building WB04, corners are eroded to provide opportunities for multiple aspects to the living accommodation, as shown below in figure 16.



Figure 16 proposed floor plan

- 10.95 All of the dwellings are dual aspect, and are provided with private amenity space in the form of partially recessed balconies or (in the case of a small number of dwellings at level 14 of WB05 T1) roof terraces.
- 10.96 The layouts are functional, and provide some degree of flexibility, with a combination of arrangements proposed for family dwellings, including combined kitchen/living/dining spaces, separate living and kitchen/dining spaces, and an intermediate adaptable partition arrangement sitting between these two different offers, giving occupiers increased choice in the layout of primary living areas. The accommodation is stacked and generally arranged to minimise conflicts between areas of different activities within adjacent properties. Cores are centrally located, as with WB04, with a similar number of dwellings served by each core, which again is considered to be acceptable.
- 10.97 Servicing and lobby areas are provided at ground floor level, along with some community and commercial floorspace in the northern end of both buildings fronting onto Asigill Gardens, as shown in the ground floor plan at figure 16 below. In order to safeguard residential amenity, conditions are suggested requiring the submission and implementation of sound proofing (including anti-vibration) and hours of operation, as well as restriction of the use of the courtyard space for residents, both in the interests of preventing disturbance but also their security and safety. The primary entrances to both blocks are located from the enclosed private courtyard, with emergency accesses from the Cascades in the case of WB05 T1 and the Aisgill Avenue facing elevation in the case of WB05 T2. Signage integrated into the gate and fencing design will allow clear wayfinding to the main entrances.

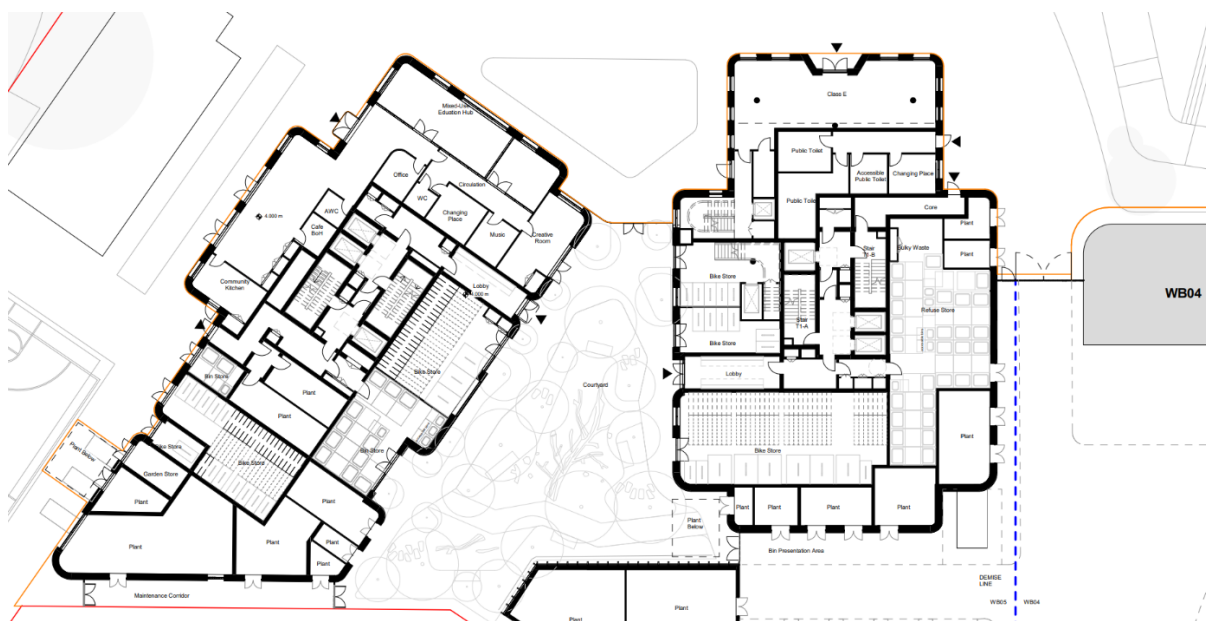


Figure 16 proposed floor plan

10.98 Private communal shared space is provided between the two buildings at ground floor level. This courtyard space is largely surrounded by inactive frontages to servicing areas; however, the main entrances to both blocks are accessed via the space, and there will be some active frontage provided by the community facility at ground floor level within WB05 T2, in the north of the courtyard. It is noted that the space is overlooked by balconies and habitable room windows from upper floors and its use is limited to residents only. Overall, the proposed arrangement is considered to be acceptable.

10.99 The quality of the dwellings proposed within the detailed phases is, for the reasons set out above, considered to be acceptable.

Accessible dwellings

10.100 **London Plan policy D7 (Accessible Housing)** requires a minimum of 10% of all new housing to be built to Building Regulations Part M4(3) standards for “wheelchair user” dwellings, with all remaining homes being delivered as Part M4(2) “accessible and adaptable” dwellings. This aligns with **Local Plan policy HO6 (Accessible Housing)** which specifies that 90% of new housing should be M4(2) compliant, with 10% being M4(3) compliant.

10.101 Within WB04, 28 dwellings (10%) distributed at levels 3 – 25 (inclusive) are proposed as Building Regulations Part M4(3) compliant. These comprise 19 one bed, two person homes and 9 two bed, four person homes.

10.102 Within WB05, 19 homes will be provided as being Building Regulations Part M4(3) compliant, 12 within WB05 T1, and 7 within WB05 T2, all of which would be two bed, three person dwellings, which would be distributed across various levels within the two buildings.

10.103 All other properties within the buildings are designed to Building Regulations Part M4(2) standards.

10.104 This accords with the relevant Development Plan policy requirements, subject to an appropriate legal mechanism securing details of the locations of the Building Regulations Part M4(3) dwellings and requiring all other dwellings to be constructed to Building Regulations Part M4(2) standards.

Children's Playspace

10.105 WB04 and WB05 will generate a child yield (as calculated by GLA's Population Yield Calculator) and are therefore required to provide on-site play space in accordance with the London Plan standard, which is 10 square metres per child. This is proposed to be delivered within the courtyard for WB05 and at podium level for WB04. The offer will be supplemented by the public provision within Aisgill Gardens, Table Park, and elsewhere throughout the wider site.

10.106 A condition requiring the submission and implementation of details of play space, including reconciliation with demand, is recommended.

10.107 The requirement and delivery for the outline phases would be considered at the time of RMA submissions being made.

10.108 Other matters identified in **Local Plan Policy HO1 (Detailed Residential Standards)**, including parking, flooding and water, sustainable energy measures, durable construction, waste, recycling, noise and daylight and sunlight are addressed elsewhere in this report.

Purpose-built Student Accommodation (PBSA)

10.109 The principle of PBSA development to address the identified London-wide need of 3,500 bedspaces per annum over the plan period is supported by **London Plan Policy H15 (Purpose-built Student Accommodation)** which encourages PBSA development in well-connected locations and as part of mixed-use developments, subject to achieving the maximum level of affordable student accommodation. **Local Plan Policy HO9 (Student Accommodation)** specifically references the ECWKO as a suitable location for student accommodation and also sets out criteria for the consideration of proposals, including that sites should be located in areas of good public transport accessibility, and the accommodation should be of good quality and respect the amenity of neighbouring occupiers and not cause detriment to the local area.

10.110 Regard has been given in this instance to the site's location within an Opportunity Area, excellent public transport access levels (PTAL 6a), good access to nearby universities in west London and Central London, and accessibility to nearby commercial, cultural, leisure and recreation facilities and open space both within the proposed masterplan and the surrounding area. A supporting Demand and Needs Assessment for the PBSA submitted in support of the application, which indicates a high level of demand within London, placing strain upon the private rented housing sector. It also notes the location of the site within a large catchment area and close to a number of institutions including Imperial College of Science, Technology and Medicine in Kensington, Royal

College of Art and Royal College of Music, together with Imperial's developing campus in White City, and Hammersmith and Charing Cross hospitals.

- 10.111 The proposed development includes the provision of 696 PBSA rooms and associated facilities within a purpose-built 33 storey building (WB03) as part of the detailed component of the application. A further 804 PBSA rooms could be provided within the later outline phases in Development Zones T and V. This could result in a total provision of up to 1,500 student bedrooms within LBHF. However, due to the range of competing land uses sought for these Development Zones and the maximum floorspace caps for each, there may be no delivery beyond the detailed phases.
- 10.112 The application proposes that 35% of the student accommodation bedrooms shall be affordable in accordance with London Plan Policy H15 (part 4), with rent levels meeting the requirements of the Mayor's Annual Monitoring Report. This would be Fast Track compliant. A Nominations Agreement with a Higher Education provider would be secured through the S106 obligations. The Applicant has confirmed that a higher education provider has agreed Heads of Terms to enter into a nomination agreement regarding the majority beds to be provided within WB03.
- 10.113 The detailed element of the scheme would give rise to 696 PBSA bedspaces, which together with the proposed maximum land use parameter cap across the entirety of the site within LBHF of 68,000sqm, equivalent to approximately 1,500 bedrooms, represents a substantial level of provision both within the detailed plots and across the LBHF site as a whole.
- 10.114 However, this provision is in the context of a high level of local and regional demand and would be provided as part of a substantial mixed-use development located in a highly sustainable location, delivering between 2,000 and 2,500 conventional dwellings within LBHF's portion of the site, together with extensive employment floor space. The PBSA would be distributed across the detailed and late outline phases. It is not considered that this would represent an over-concentration of PBSA accommodation. It is also noted that the ECWKO is identified in the Local Plan as being suitable for PBSA, and that proposals will be supported. It is also noted that delivery of the outline yield is not guaranteed in the event that other land uses (such as co-living) are brought forward in preference to PBSA within Development Zones T and V.
- 10.115 For these reasons, the principle of PBSA as a key land use is acceptable, subject to the following requirements being secured by way of an appropriate planning obligation:
- The use of accommodation secured exclusively for students with the exception of during the summer vacation period.
 - 35% affordable student accommodation provided in line with the London Plan definition and affordability requirements.
 - A nominations agreement with one or more higher education institutions covering the majority (**i.e. a minimum of 51%**) of the student rooms, including all the affordable accommodation.

10.116 In terms of the residential quality provided by the proposed PBSA in WB03 regard has been given to the criteria set out in Part 5 of London Plan policy H15, Parts d-e of Local Plan policy H09, Key Principle DA9 (Hotels and Student Accommodation) within the LBHF Planning Guidance Supplementary Planning Document, and the Mayor of London's Student Housing LPG.

10.117 WB03 is proposed to be delivered as a 31-storey tower containing the main PBSA residential accommodation with supporting accommodation and commercial floorspace being provided at lower ground floor, ground floor and upper ground floor levels within the three-storey podium (34 storeys in total).

10.118 The accommodation proposed within WB03 comprises 696 PBSA bedspaces within an irregular ellipse-shaped floorplate arranged around a central core over 31 storeys (levels 02 – 32 inclusive). The number of bedspaces per floor are shown below in housing table 7.

Level	Studios (per floor)	En suite (per floor)	Total (per floor)	Overall total
02 – 09	10	14	24	192
10 – 14	11	13	24	120
15	8	13	21	21
16 – 18	11	13	24	72
19 – 28	11	13	21	240
29	18	0	18	18
30	18	0	18	18
31	11	0	11	11
32	4	0	4	4
TOTAL				696

Housing table 7

10.119 The accommodation would be provided as a mixture of studios (single occupancy self-contained rooms with kitchenette facilities) and cluster flats (six or seven en-suite bedrooms with shared cluster kitchen facilities).

10.120 Studio accommodation is provided at every floor providing sleeping accommodation, with two cluster flats (one at each apex of the floorplan) provided on every floor between levels 02 and 28 (inclusive). Two typical floorplans are shown below in figure 17.

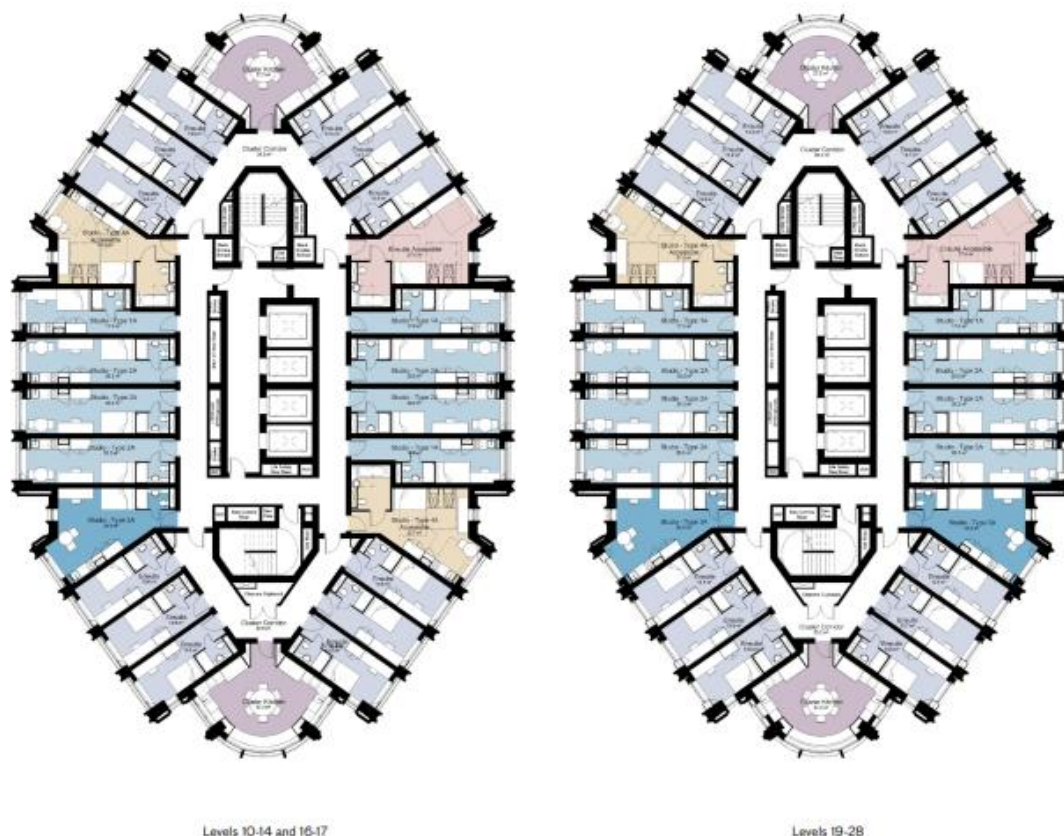


Figure 17: typical floorplans

- 10.121 The primary access would be via a lobby fronting Empress Place Boulevard (to be delivered within the Phase 1 public realm RMA ahead of delivery of the occupation of WB03, WB04 and WB05). Communal amenity space would be provided at upper ground floor level, accessed directly from the principal lobby area. This would include a generous communal space, four amenity rooms, seven study rooms, a meeting room, a gym and a studio. An internal courtyard is provided to give outlook and natural light to the internal space.
- 10.122 A small area of additional shared communal space is provided at level 31 which is shown as providing a kitchen/living/diner area which would be available to all occupiers on a booking basis.
- 10.123 The shared external amenity space is provided by way of two shared communal terraces with an area of 192sqm at level 32. In addition to this, some of the studios on levels 30 – 32 (inclusive) would have private terrace areas.
- 10.124 Servicing, including a secondary lobby and delivery storage facilities is proposed to be provided at lower ground floor level, (accessed from the service access road) to the rear. Bicycle storage facilities are located at ground floor level.
- 10.125 There are no specified space standards for PBSA beyond a general policy requirement at both local and regional level for the accommodation to be functional, in terms of layout and quality of living space.

- 10.126 All of the bedrooms, whether located in cluster flats or designed as self-contained studio accommodation, have a sleeping and study area, and a shower room.
- 10.127 The studios would typically have a floor area of 20 – 21sqm, with some “premium” studios of up to 28sqm in area. En-suites within cluster flats would have a typical floor area of 13.7sqm. En-suites and studios would both generally have a 2.8m wide footprint, with sleeping and washing facilities located closer to the core of the building. All rooms would be provided with built in storage and would benefit from mechanical ventilation with heat recovery and would also have a window with an openable panel for passive ventilation.
- 10.128 The self-contained studios also have a kitchenette and associated seating area, which in all cases is located on the outer wall of the studio. This is welcomed in the interests of fire safety and ensuring a means of escape from the sleeping area in the event of an emergency. The studios are larger than the en-suites in order to accommodate the kitchenette facilities.
- 10.129 10% of the bed spaces would be provided as being Building Regulations Part M1² compliant, i.e. capable of occupation by wheelchair users, and all would have level access from street level. The wheelchair user accommodation would be a mix of studios and en-suites within cluster flats to give potential occupiers a choice of accommodation type.
- 10.130 The PBSA proposed within the detailed plots is consistent in terms of layouts and bedspace provisions with similar developments across London. The layouts have been thoughtfully considered, and a range of accommodation types and sizes is proposed, which allow choice for students. 10% of the accommodation is provided as being fully accessible, and the internal communal space provides a range of facilities for occupiers. Whilst the external amenity space is limited in area, and located on the second highest floor (meaning that whilst it has an excellent view, it may not be usable for persons with vertigo), WB03 is located in close proximity to the Cascades, Table Park and Aisgill Gardens, all of which are required to be delivered ahead of occupation as part of the initial RMA submission for the public realm within Phase 1. In light of this, the overall offer of external amenity space for occupiers is considered to be acceptable.
- 10.131 For these reasons, the PBSA offer within the detailed component (Building WB03) is considered to be acceptable, subject to an appropriate legal mechanism as set out in paragraph 10.115 above, and conditions requiring the layouts of the studios and cluster flats to remain as consented in the interests of safeguarding residential amenity of the occupiers and fire safety.
- 10.132 Any additional PBSA coming forward within Development Zones T and U will be subject to detailed consideration at the time of any relevant RMA application.

² Student accommodation falls under hotel/motel use for purposes of assessment against Building Regulations.

Large scale purpose-built shared living (Co-living)

- 10.133 Proposals for co-living should be assessed against **London Plan Policy H16 (Large-scale Purpose-built Shared Living)** which requires proposals to be of a good quality and design not only in terms of the living accommodation but also communal facilities, to be located in sustainable locations and contribute towards mixed and inclusive neighbourhoods. Such accommodation is also required to be appropriately managed in relation to tenancies, ownership and contribution towards affordable housing (see paragraph 10.115 above).
- 10.134 In February 2024, the GLA published the Mayor of London's Large-Scale Purpose-Built Shared Living LPG, which expands its guidance and specifically identifies which areas will be more suitable for co-living, including Opportunity Areas and Inner London areas with a PTAL of 4 or higher.
- 10.135 Co-living units are defined for the purposes as a Sui Generis use, providing non-self-contained housing units which benefit from extensive communal facilities and effective management. They are distinct from Class C3 residential units but are not restricted to occupation by specified groups, such as students or older people. Co-living is a relatively new type of housing, designed to be an alternative to living in a shared rental house or flat.
- 10.136 The proposed development does not include any co-living accommodation within the detailed phase; however permission is sought for up to 48,000sqm co-living floorspace (approximately up to 960 co-living units). This is proposed to be located within the early outline phase in Development Zone C (up to 20,000sqm), and/or in the later outline phases in Development Zones T (39,000sqm), V (9,000sqm) and W (18,000sqm).
- 10.137 Clearly not all of this provision can be delivered within the scope of the maximum overall cap on co-living floorspace of 48,000sqm; for example, in the event that 9,000sqm is provided within Development Zone C, and 39,000sqm within Development Zone T, none will come forward in Development Zones V and W. It is also possible that, due to the range of competing land uses sought for these Development Zones and the minimum delivery requirements for conventional housing, there may be no delivery of co-living at all across the entirety of the site. In the event that co-living is brought forward at the RMA stage for any of the relevant Development Plots, proposals will be assessed against the relevant Development Plan policies at that stage.
- 10.138 Notwithstanding the above, the delivery of co-living as part of the housing offer across the site is acceptable in principle, given the good transportation links, sustainable location, and designation of the site as being within the ECWKOA.
- 10.139 This accords with the conclusion of the GLA in the Stage 1 report that the principle of delivery of co-living accommodation on the site is acceptable, provided that delivery of conventional C3 housing is not prejudiced and accordingly a minimum number of conventional C3 homes is secured.

Employment Related Accommodation (ERA)

- 10.140 LBHF's Upstream London (2024) describes the borough's ambition to deliver innovative models of housing which can help allow communities to benefit from the opportunities generated by growth, and recognises the struggles that are experienced by employees who do not qualify for intermediate or social housing, but are insufficiently remunerated to access the open housing market, developing "Affordable Housing +" tenure types alongside developers.
- 10.141 On Earls Court, this is being delivered as a new 'Employment Related Accommodation (ERA)' housing product which would deliver lower cost housing for those employed by commercial occupiers of the site on a rent to buy basis. This will sit alongside the conventional affordable housing offer within the proposed market housing yield. No further details have been provided in support of the application; however it is anticipated that a minimum of 15% of all dwellings within any building providing market housing across the entirety of the site would potentially be available as ERA.
- 10.142 As the proposed additional tenure type would have no detrimental impact upon the conventional affordable housing yield, but would potentially open up the market accommodation to a wider financial catchment within the employee pool generated by the development itself, its inclusion is welcomed. This should be secured by way of s106 legal agreement which should also include details of the level of subsidy available, mechanism for conversion from rental to purchase, minimum delivery requirements (15%), qualification criteria for potential occupiers and marketing details in the form of an ERA Implementation Plan.
- 10.143 For the reasons set out above, the housing offer across the detailed and outline phases in respect of affordable housing offer, variety of product types, and quality of accommodation (in terms of the detailed plots) is considered to be acceptable, subject to the conditions and legal obligations set out in the report.

11 NON-RESIDENTIAL USES – COMMERCIAL

Land Use Assessment (Non-Residential)

- 11.1 The proposal includes the provision of non-residential floorspace within all parts of the development, as detailed above. The uses proposed include retail/F&B/commercial, community/social infrastructure and leisure in respect of the detailed phases. These uses are all also proposed for the outline phases, together with logistics/data centre/storage & distribution, hotel, employment (office/R&D) and culture as summarised in table 1 below which shows the actual floorspace proposed within the detailed plots, and the maximum proposed across firstly the early outline phases and secondly across all of the outline plot (i.e. including the early outline phases).

Land use	Detailed Plots LBHF (GEA m ²) ³	Early outline phases LBHF (max GEA m ²) ⁴	Total outline phases LBHF (max GEA m ²) – cumulative total across outline phases ⁵	Minimum outline phases (GEA m ²) ⁶
Employment (office/R&D)	0	70,000	155,000	40,000
Retail/F&B/commercial	3,235	7,000	12,000	2,000
Culture	0	4,000	4,000	250
Community/social infrastructure	422	750	1,500	250
Education and childcare	0	20,000	25,000	N/A
Healthcare and care homes	0	25,000	65,000	N/A
Leisure	2,113	2,500	6,000	N/A
Hotel	0	20,000	20,000	N/A
Logistics/data centre/storage & distribution	0	0	10,000	N/A

Non-residential table 1

- 11.2 The application is supported by an Affordable Workspace Strategy, Commercial Strategy, Cultural Strategy, Economic Inclusion Statement, Retail Strategy, Temporary Uses Strategy and Town Centre Use Impact Assessment, which have been independently assessed by AECOM. The supporting documentation has subsequently been supplemented with a Commercial Strategy Addendum (including an Office Impact Assessment), an Economic Inclusion Statement Clarification, and a Town Centre Impact Assessment Addendum.
- 11.3 The Earls Court site lies within both the Fulham Regeneration Area (FRA), and the Earls Court and West Kensington Opportunity Area (ECWKOA). The London Plan recognises the role of opportunity areas in delivering growth through the creation of employment opportunities alongside housing in **policy SD1 (Opportunity Areas)**. It is recognised that the policy requires the provision of cultural, community and retail uses alongside employment uses in such designated areas. **Local Plan strategic policy FRA (Fulham Regeneration Area)** sets out the expectation that development proposals should contribute to the provision of up to 9,000 jobs across the FRA, most of which in the ECWKOA, and secure economic benefits for local residents through provision of access to new job opportunities, whilst enhancing the vitality and viability of Fulham Town Centre, particularly on North End Road. Local Plan policy FRA1 (Earls Court and West Kensington Opportunity Area) expands upon this ambition (noting that the policy scope includes the West Kensington Estate, which is outside of the redline boundary of the application). This policy sets out the expectation that proposals should provide a mix of land uses, including

³ Within Phase 1 (Development Plot H)

⁴ Phases 1, 2, 3 and 4 (Development Plots B1, C, G1, I, N and P)

⁵ Phases 1, 2, 3, 4, 5, 6, 7 and 8 (Development Plots B1, C, G1, I, N, P, T, U, V1, W, X, Y and Z)

⁶ Phases 1, 2, 3 and 4 (Development Plots B1, C, G1, I, N and P)

employment, hotel, retail and cultural facilities alongside housing, as well as infrastructure to support the needs of the area as a whole.

- 11.4 **London Plan policies GG1 (Building Strong and Inclusive Communities), GG2 (Making the Best Use of Land) and GG5 (Growing a Good Economy)** support the successful, sustainable, inclusive mixed-use places which deliver the amenities and facilities that communities need to thrive, alongside economic opportunities and growth. Policy GG5 in particular requires that proposals ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning, in the interests of conserving and enhancing London's global economic competitiveness and ensuring that the city's economic success is shared amongst all Londoners. These strategic policies supporting economic good growth align with the application delivers the maximum reasonable level of affordable housing. which states that proposals for mixed use schemes for new employment uses, especially those providing accommodation for creative industries, health services, bio-medical and other research-based industries will be supported, subject to assessment of the quality of the proposals, how they sit alongside the Council's wider economic strategies (including Upstream London), and their impacts, including on existing businesses. The policy recognises that the ECWKO is a preferred location for new office development above 2,500sqm. **London Plan Policy E4 (Land for Industry, Logistics and Services to Support London's Economic Function)** provides support for storage and distribution uses falling within Use Class B8. Whilst such uses are traditionally associated with industrial sites and locations, the policy incorporates consideration of proposals for last mile delivery hubs, and flexible hybrid spaces to accommodate services that support the wider London economy and provide accommodation for micro, small and medium-sized enterprises. Support for the provision of land for such uses is also set out in paragraph 87 of the NPPF.
- 11.5 In respect of the provision of non-residential floorspace, in accordance with **Local Plan policy TLC1 (Hierarchy of Town and Local Centres)**, proposals should be assessed in relation to their impact on existing centres, including Fulham Town Centre and the local centre of North End Road. In cases such as this where the proposals exceed 300sqm, a retail impact assessment and sequential test are required to be undertaken, both of which have been submitted in support of the application and been independently scrutinised on behalf of the LPA by AECOM. **London Plan policies SD6 (Town Centres and High Streets) and SD7 (Town Centres: Development Principles and Development Plan Documents)** seek to protect the vitality and viability of town centres, and reinforce the requirement for sequential tests and impact assessments to be used in assessing the impact of proposals, alongside embedding the need for local Development Plan policies to identify sites, such as the ECWKO, that are suitable for higher density mixed use development in sustainable locations. The LPA and the GLA are in agreement that for the purposes of determining the application, the site constitutes an edge-of-centre site in planning policy terms.

- 11.6 **London Plan Policy E9 (Retail, Markets and Hot Food Takeaways)** directs such uses towards town centres and aligns with the policies set out above in terms of assessing impacts on existing centres. Local Plan policy relating to such uses sits generally within **Local Plan policy TLC1 (Hierarchy of town and local centres)** and more specifically within **Local Plan policy FRA1 (Earls Court and West Kensington Opportunity Area)**, both discussed in detail above. **London Plan policy HC6 (Supporting the night-time economy)** specially supports those sectors of the economy that contribute towards an inclusive, accessible and respectful 24-hour city.
- 11.7 **London Plan policies E1 (Offices) and E2 (Providing Suitable Business Space)** seek to ensure that there is sufficient appropriately located office and other business space, of high quality, flexible and adaptable design, to meet demand and encourage the supply of a range of employment accommodation to meet the varied needs of a wide range of potential future occupiers. These policy objectives are aligned with **Local Plan Policy E1 (Providing for a Range of Employment Uses)**.
- 11.8 Development Plan policy requires additional support for businesses through the provision of affordable workspace, as required by **London Plan policy E3 (Affordable Workspace)** and **Local Plan policy E1 (Providing for a range of Employment Uses)**, in accordance with the criteria set out in the **LBHF Affordable Workspace SPD (2022)**.
- 11.9 **London Plan Policy E8 (Sector Growth Opportunities and Clusters)** specifically supports sector specific growth opportunities and clusters such as start-up, incubation and accelerator spaces for micro, small and medium-sized businesses, flexible and conventional workspaces, including laboratory spaces, particularly where they support innovation, research and development, or support existing higher and further education providers. The policy also encourages boroughs to identify and support the growth of sustainably located employment clusters. In support of the policy, the London Plan identifies advanced urban services (such as architecture, engineering, energy and transportation), culture and creative industries, financial and business services, life sciences, the low carbon and environmental goods and services sector, tech and digital, and tourism, alongside higher and further education, as being suitable for business growth on a strategic scale. Alongside this policy objective, the Mayor of London's Growth Plan for London, whilst not a planning policy document, recognises Earls Court as an emerging green innovation cluster with a focus on climate tech, which chimes with the Council's aspirations for high quality, innovative economic growth opportunities throughout the borough, and particularly in regeneration and opportunity areas, as set out in the LBHF Local Plan and Upstream London. This approach of encouraging sustainable economic growth through the creation of opportunities for innovative growth industries, accords with paragraph 87 of the National Planning Policy Framework.
- 11.10 Alongside the policies listed above, **London Plan policy E11 (Skills and Opportunities for All)** and **Local Plan policy E4 (Local Employment, Training and Skills Development Initiatives)** support the delivery of training

and employment opportunities through the development management process during the construction and end–use phases.

- 11.11 Although town centre uses including employment and retail are the predominant commercial (non-residential) uses for which planning permission is sought, there are smaller elements of other uses proposed, including hotel, education, hospital and care home use falling within Use Class C2, leisure, culture and community and social infrastructure uses.
- 11.12 It should be noted that there are maximum permitted areas for each use and for each Development Zone (as shown in Table 7 of the Development Specification rev 01), and this, allied with the minimum floorspace requirements imposed in respect of certain priority uses (including conventional residential falling within Use Class C3, office and R&D falling within Use Class E(g), and community and cultural uses, as shown in Table 4A.4R of Chapter 4A Amended Proposed Development Description Volume 1A Main Environmental Statement Report Addendum) as described above, leaving only 141,150sqm for floorspace beyond the minimum delivery requirements. This means that there are some uses (including some of those listed above) which are unlikely to be delivered at all, or may otherwise fall far short of the anticipated potential yield, although it is noted that community and social infrastructure and cultural uses have a minimum yield within LBHF of 350sqm and 500sqm respectively.
- 11.13 Nonetheless, the policy context for these secondary uses is summarised below.
- 11.14 As noted above, **Local Plan policy FRA1 (Earls Court and West Kensington Opportunity Area)** specifically identifies the designated area as being appropriate for a range of uses, including hotels, leisure and culture as part of the wider mix of promoted land uses which includes residential, employment and retail, whilst setting out the need for any supporting social and economic infrastructure required to serve the growing residential, worker and visitor population to be provided as part of any proposals coming forward. Whilst this policy does not explicitly reference education, healthcare, or community infrastructure, the supporting text acknowledges that educational facilities, as well as healthcare falling within Use Class C2 and other community infrastructure such as a community centre, library, leisure centre or police station may be required to be provided on site as part of any development proposals coming forward. Alongside this, **Local Plan policy INFRA1 (Planning Contributions and Infrastructure)** allows for S106 agreements to be entered into in order to ensure that infrastructure necessary to serve developments is secured, which may include financial contributions towards education and healthcare.
- 11.15 Hotels (Use Class C1) are defined in the National Planning Policy Framework as constituting a town centre use, which flows into Development Plan designation. The London Plan identifies a strategic need for hotel bedspaces, expressed through **policy E10 (Visitor Infrastructure)** which seeks to strengthen London's visitor economy and associated employment and maintain a sufficient supply and range of serviced accommodation taking into account the needs of business as well as leisure visitors. **London Plan Policy SD6**

(Town Centres and High Streets) supports the delivery of tourist infrastructure including hotels in such locations. In addition to **Local Plan policy FRA1 (Earls Court and West Kensington Opportunity Area)**, policy E3 (Provision for visitor accommodation and facilities) also identifies the ECWKOAs as being suitable for tourist infrastructure and sets out the criteria against which proposals will be considered. These local criteria are elaborated upon in LBHF Planning Guidance SPD key principle DA9 (Hotels and student accommodation), including standards of accessible and inclusive design. The Mayor of London's Growth Plan for London recognises Earls Court as an existing internationally significant visitor destination.

- 11.16 **Section 8 of the NPPF (2024)** supports the development of community facilities and advises that decisions should plan positively for the provision and use of shared spaces and community facilities. Paragraph 98 specifically encourages the delivery of shared spaces and community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings and public houses) and other local services to enhance the sustainability of communities and residential environments.
- 11.17 **Local Plan policy CF1 (Supporting Community Facilities and Services)** provides the planning policy context for a wide range of social infrastructure, including healthcare, education, childcare, leisure, recreation, sport, art, culture and entertainment. The policy supports the provision of new facilities and notes the potential for delivery of major new education, leisure, arts, sports and recreation facilities in the ECWKOAs. Alongside this, **policy CF3 (Enhancement and Retention of Community Uses)** requires the provision of new or expanded community uses, or commensurate payments in lieu, should be provided as part of the necessary supporting social infrastructure for significant development proposals, and the replacement of any facilities lost as a result of development proposals.
- 11.18 In addition, **London Plan Policy GG1 (Building Strong And Inclusive Communities)** requires development to provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, providing support for developments that strengthen community cohesion and provide spaces for social interaction. **London Plan policy S6 (Public toilets)** requires large scale developments such as that currently under consideration to provide free publicly accessible toilets suitable for a range of users, including "changing places" spaces.
- 11.19 **London Plan policy GG3 (Creating a Healthy City)** sets out the policy aspiration to improve Londoners' physical and mental health and reduce health inequalities. The delivery of healthcare, care homes, education and childcare uses is a key tool in delivery. Such uses fall under the scope of **London Plan policies S2 (Healthcare and Social Care Facilities)** and **S3 (Education and Childcare Facilities)**, which requires a sufficient supply of good quality healthcare, social care, education and childcare facilities to be maintained, informed by assessment of need.

- 11.20 **London Plan policy HC5 (Supporting London's Culture and Creative Industries)** recognises the economic and social value of London's creative and cultural offer, and seeks to support the growth and evolution of London's diverse cultural facilities and creative industries through the promotion of locally-distinct clusters of cultural facilities, venues and related uses, and specifically requires proposals for opportunity areas and large-scale mixed-use developments to include new cultural venues and/or facilities and spaces for outdoor cultural events.
- 11.21 **London Plan policy GG3 (Creating a Healthy City)** supports the promotion of active and healthy lives for all Londoners, whilst **London Plan policy S5 (Sports and Recreation Facilities)** seeks to ensure a sufficient supply of good quality, accessible and varied sports and recreation facilities, noting that a high quality, flexible open or indoor space can provide appropriate accommodation, recognising the social, health and wellbeing benefits that can flow from physical activity.
- 11.22 **London Plan policy E4 (Land for Industry, Logistics and Services to Support London's Economic Function)** provides support for storage and distribution uses falling within Use Class B8. Whilst such uses are traditionally associated with industrial sites and locations, the policy incorporates consideration of proposals for last mile delivery hubs, flexible hybrid spaces to accommodate services that support the wider London economy and provide accommodation for micro, small and medium-sized enterprises

11.23 Impact on existing Centres

- 11.24 The site adjoins the North End Road Local Centre. It therefore qualifies as 'edge-of-centre' for purposes of assessment against planning policy. It should also be noted that the ECEKOA is identified in various Development Plan policies, including **Local Plan policies FRA1 (Earls Court and West Kensington Opportunity Area), E1 (Providing for a Range of Employment Uses) and CF1 (Supporting Community Facilities and Services) and London Plan policy SD1 (Opportunity Areas)**, as being an appropriate location for town centre uses, proposals for which will be supported subject to compliance with the criteria set out in the relevant policies. In addition, **London Plan policies SD6 (Town Centres and High Streets) and SD7 (Town Centres: Development Principles and Development Plan Documents)** recognise the contribution that mixed use redevelopment of edge-of-centre sites can make, particularly where identified in Local Plans, as is the case with Earls Court. The principle of the redevelopment of the site has therefore been accepted in principle at the plan making stage.
- 11.25 Local and regional planning policy directs proposals for town centre uses towards existing centres. If no suitable site is available then consideration should be given to sites on the edge of centres that are, or can be, well integrated with the existing centre, and public transport and active travel networks. The policy context requires that proposals for new edge-of-centre developments involving town centre uses (such as retail and office) of this scale are required to be supported by an impact assessment and sequential test, both

of which have been submitted in support of the application in the form of Retail and Commercial Strategies that explain the proposed approach to the delivery of new retail and employment generating workspace. These have been robustly reviewed by AECOM, and further information provided in support of the application as a result, although a key query, namely that both the sequential and impact assessment have been undertaken on a whole site basis rather than on a phase-by-phase basis, has not been addressed in the submission documents. This is discussed in more detail below.

- 11.26 The proposal will bring forward a substantial quantum of town centre uses in an edge-of-centre location. Many of these uses are in large part integral to delivery of key Development Plan objectives with regard to the bringing forward of development on the ECWKOA, and in respect of others, are necessary to meet the needs generated by the delivery of housing and employment on the site. Accordingly, the sequential test concludes that the town centre uses proposed cannot be provided on an alternative site, and therefore, as such, the sequential test has been satisfied. This is also the conclusion of the Local Planning Authority.
- 11.27 The assessment of the impact of the development on existing town centres, has (similarly to the sequential test) also been undertaken on a site-wide basis, with a high-level consideration of the early phases separate to the later phases.
- 11.28 The need to provide town centre uses within the detailed phase commensurate to serve the emerging needs of the development is understood and accepted, however there remains a substantial degree of uncertainty over the location and scale of town centre floorspace across the outline phases, and therefore also the specific relationship to, and impact on, existing centres, which may well shift over time during the course of the build out of the development.
- 11.29 As such, an appropriate legal mechanism is suggested to secure the submission of updated Town Centre Impact Assessments as part of a Commercial and Employment Delivery Strategy submitted in support of all relevant RMA applications (as alluded to in paragraph 3.68 of the Town Centre Impact Assessment Addendum B Response to LBHF (LSH) Appraisal).
- 11.30 Subject to this requirement, the impact on existing town centres is considered to be acceptable, subject to the additional conditions set out below.

DETAILED COMPONENT

- 11.31 The LBHF detailed component provides predominantly residential uses falling within conventional Use Class C3 and PBSA, as discussed above. However, some commercial floorspace is provided at lower ground, ground, upper ground and first floor levels within the podium. The offer is summarised in table 2 and figure 17 below.

Detailed phases – non-residential land uses		
Use	Floor area (GEA)	Location
Retail/F&B/Flexible commercial	3,235msq	WB03 (ground floor), WB04 (ground floor), WB05 T1 (lower and upper ground floor)
Community /Social Infrastructure	422msq	WB05 T1 [public toilets] (lower ground floor), WB05 T2 [community centre] (lower ground floor)
Leisure (Indoor Sport and Recreation)	2,113msq	WB04 (first floor)

Non-residential table 2

11.32 As set out in the description of development, planning permission is sought for up to 3,235 sqm GEA of flexible retail, food & beverage, commercial and/or cultural floorspace (Use Classes E(a)/(b)/(c)/F/sui generis); 2,113 sqm GEA leisure floorspace (Use Classes E(d) / sui generis) and 422 sqm GEA of community floorspace (Use Classes E(e)/(f)/(g)/F. With the exception of the leisure floorspace located at first floor level within WB04 (with lobby facilities at ground floor level) and the community floorspace located at ground floor level in WB05 T2, the uses are all sought on a flexible basis for retail, food & beverage and commercial, meaning that once planning permission has been granted, the use can switch between the consented uses for 10 years, with the use in operation at the end of the 10 years becoming the lawful permanent use of the floorspace. This provision is allowed for under Class V of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) although this is not explicitly referenced in the description of development. A degree of flexibility is sought in relation to these detailed plots, as set out in the Development Specification, as shown below in figure 17.

H (WB03)	31,491	LBHF	<u>Predominant Use:</u> Purpose Built Student Accommodation (Sui Generis) <u>Other Uses:</u> Flexible Retail / F&B / Commercial and/or Culture (Use Classes E(a)/(b)/(c) / F / Sui Generis), Leisure (Use Class E(d) / Sui Generis), Ancillary (Sui Generis)
H (WB04)	40,512	LBHF	<u>Predominant Use:</u> Residential (Use Class C3) <u>Other Uses:</u> Flexible Retail / F&B / Commercial / Culture (Use Classes E(a)/(b)/(c) / F / Sui Generis), Leisure (Use Class E(d) / Sui Generis), Ancillary (Sui Generis)
H (WB05)	20,970	LBHF	<u>Predominant Use:</u> Residential (Use Class C3) <u>Other Uses:</u> Flexible Retail / F&B / Commercial / Culture (Use Classes E(a)/(b)/(c), F / Sui Generis), Leisure (Use Class E(d) / Sui Generis), Ancillary (Sui Generis)

Figure 17

11.33 These could potentially be distributed as shown on the floor plans shown in figure 18. Mid-green areas (WB05) are community spaces, bright green (WB04) is leisure, orange areas are flexible commercial floorspace, purple areas are food and beverage (F&B), red is retail, pink and beige areas are back of house (bicycle parking, servicing, storage, plant, etc.) and shades of yellow are residential (including lobby areas). In addition to the areas shown on these floor plans, there is also an area at first floor level within WB04 which is allocated as indoor leisure, which is expected to be delivered as a commercial gym. However, please note that (with the exception of the areas identified for community [WB05] and leisure [WB04] uses) these plans show indicative non-residential uses and could potentially be used for other purposes falling within

retail, F&B and flexible commercial under the flexible consent sought, as described above.

- 11.34 Please also note that due to land level changes within the site, the lower ground floor accommodation within WB05, which will provide community facilities, will open out at street level, however the same floor within WB03 and WB05 will be at basement level, with upper ground floor opening out at street level.



Figure 18 Lower and upper ground floor uses WB03, WB04, WB05

- 11.35 The non-residential land uses within Development Plot H are all located at, and accessed directly from, ground floor levels fronting onto the primary routes through this part of the site (Empress Place Boulevard, the Cascades and Aisgill Gardens) with the exception of the leisure use which is anticipated to deliver a commercial gym or similar facility, and would be located at first floor level.
- 11.36 This approach to the general siting of commercial floorspace within the Development Zone is welcomed as it represents legible placemaking, which will have the beneficial effect of activating the wider streetscape.
- 11.37 The range of commercial land uses proposed complement the residential uses coming forward in the detailed plots and would also make a positive contribution towards providing facilities within the wider site.
- 11.38 Whilst some degree of flexibility is required given the need to be able to respond with agility to market conditions, more certainty is required in respect to delivery of the community facilities in particular, as they constitute mitigation for the impact of the development.
- 11.39 The provision of community facilities within the development is welcomed. As shown on the indicative plan above (figure 18), if located at the base of WB05 T1 and T2 (the community centre and publicly accessible toilets, respectively), they are well sited to address Aisgill Gardens, the community hall proposed on Development Plot I (to the west of WB05 T2) and the West Kensington Estate (in the case of the community centre within Building WB05 T2) and the Cascades (in the case of the public toilets in Building WB05 T1).
- 11.40 However, to safeguard this positive approach to place-making and well-considered response to the public realm, a condition requiring the provision of the public toilet facilities within these buildings prior to occupation of WB04 and WB05 T1 is suggested so that they are available for users of the public realm in Phase 1 from its first use. Alongside this a legal obligation requiring the provision of the community facilities at ground floor level within WB05 T2 prior

to occupation of WB04 and WB05 T1, with (in the interests of providing flexibility to the applicant) an either/or mechanism requiring a £125,000 financial contribution towards the improvement of existing community facilities within the West Kensington and Gibbs Green Estate in the event that the proposed community centre is not delivered in line with this timeframe. This condition and legal agreement are required because whilst additional community facilities are proposed within Development Plot I, due to part of the land that this Development Plot is sited on being outside of the ownership and control of the applicant, there is less certainty over the timescale of its delivery, and delivery of adequate community facilities are necessary to mitigate the impact of the development from the earliest stages of occupation, particularly in light of the loss of the existing community hub as a result of the build out of the detailed phases, which the provision of alternative on-site facilities is expected to offset. It is also the case that the uses indicated on the drawing ECD-WB05-ZZ-DRM-07-GF-DR-A-020100 rev P1 (LBHF Detailed Component – WB05 Proposed Ground Floor Plan) are described variously as “community kitchen, mixed-use education hub, office, creative room, public toilet” and other terms, and Use Class F2 is not specified on the plans. In order to ensure delivery of the community facilities (including public toilets) needed to serve the development, a greater degree of certainty in respect of these spaces is required.

- 11.41 Leaving aside community facilities and considering commercial floorspace, it is recognised that a range of facilities may be required by the occupiers of the detailed plots, and that the flexibility sought allows the developer to respond to these needs. However, these include Use Classes E(a), E(b) and E(c), into which classes conventional retail, F&B and financial/professional services fall respectively, which have a wide range of differing potential impacts in respect of causing disturbance to neighbouring occupiers in respect of noise, odour, vibration and other matters.
- 11.42 Whilst there is no objection in principle to this approach, there is a need to protect the amenity of residents, particularly in relation to F&B uses, and to this end, conditions requiring the submission and implementation of details of how capacity for suitable extraction and ventilation systems is planned into the fabric of all commercial units which could potentially deliver Use Class E(b) prior to commencement of above grade works, and the submission and implementation of details of any such extraction and ventilation systems prior to commencement of any activity falling within Use Class 3(b), are suggested.
- 11.43 As regards protecting residential amenity against other forms of disturbance, it is recognised that commercial uses can generate a range of activities that may have detrimental impacts. As such, conditions requiring the submission and implementation of details of sound proofing between residential and non-residential uses and hours of operation (for customers and staff) are proposed for all commercial floorspace. Notwithstanding the limited scope for the commercial units to occupy spillover space due to the restrictive demise of the detailed plots, a condition requiring the submission and implementation of operational management plans for all commercial uses is required.

- 11.44 The conditions specified above are necessary due to the uncertainty over the nature of the uses coming forward, and the difficulties (and expense to the occupier) in remedying these matters retrospectively. In addition, a condition requiring the submission and implementation of details of sound and vibration minimising prior to the installation of any internal or external plant is also considered necessary in the interests of safeguarding residential amenity.
- 11.45 Notwithstanding the desire for flexibility noted above, a condition requiring a minimum delivery of retail floorspace within a single building across Development Plot H is suggested in order to safeguard delivery within this phase, in the interests of ensuring that the needs of occupiers are satisfactorily catered for, as alluded to in paragraph 3.15 of the Town Centre Impact Assessment Addendum B Response to LBHF (LSH) Appraisal. A condition preventing amalgamation of commercial units within this phase is not considered necessary in the circumstances of this case as none of the units that are being delivered are capable of being amalgamated into larger units of an unacceptable scale however this may be considered appropriate at RMA stage.
- 11.46 A condition requiring commercial frontages to be kept clear-glazed is recommended, in the interests of visual amenity, safeguarding active frontages along key routes through the site, and maintaining natural surveillance of public spaces.
- 11.47 Flowing from this, although the flexibility to use commercial floorspace for purposes falling within Use Class E(d) is sought in respect of all of the buildings within Development Plot H, it is only shown on the first floor of Building WB04 (with an entrance at ground floor level), as shown on drawing numbers ECD-WB04-P1-SHR-07-GF-A-102200 rev P01 and ECD-WB04-P1-SHR-07-01-A-102200 rev P01; given the negative impact that such uses have in respect of introducing blank facades at street level, a condition restricting this use to the first floor of WB04 (with access from ground floor level) is suggested to sit alongside the unobscured frontages condition set out above in paragraph 11.46 is suggested.
- 11.48 Subject to the conditions set out above, the non-residential uses proposed for detailed Development Plot H (Buildings WB03, WB04 and WB05 T1 and T2) are acceptable.

OUTLINE COMPONENT

- 11.49 As set out above, the degree of flexibility sought by the applicant in respect of the outline phases is such that there is no certainty over the extent to which any of the proposed land uses will be delivered, other than where there is a stated minimum, (as noted above in table 1).
- 11.50 To take employment/R&D as an example, the applicant has sought consent for delivery across multiple Development Zones, as shown below in table *. However, these Development Zones have a maximum floorspace cap, and other uses are also proposed for these Development Zones, as shown in table

* which sets out the proposed floorspace yields for different uses within Development Zone W, and also the maximum floorspace parameter for this Development Zone.

- 11.51 This example illustrates the significant degree of uncertainty in terms of what might actually be delivered across individual plots and the site as a whole, notwithstanding that minimum delivery requirements for C3 conventional residential accommodation, retail/F&B/commercial, employment (office/R&D), community/social infrastructure and culture have been introduced as part of the 2025 amendments to the submission.

Development Zone	Early/Late Phase	Employment/R&D floorspace sought (GEA m ²)	Development Zone W (LBHF)		
			Use	Maximum Floorspace Sought Per Use (GEA m ²)	Maximum Floorspace Parameter for all uses within Development Zone W
B1 (LBHF)	Early	25,000	C3 residential	40,000	42,000
B2 (RBKC)	Early	23,000	Co-living	16,000	
C (LBHF)	Early	45,000	Employment (office/R&D)	24,000	
D (RBKC)	Early	2,000	Education	22,000	
E (RBKC)	Early	16,000	C2 (older persons care home/hospital)	38,000	
F (RBKC)	Early	41,000	Retail/F&B/commercial	2,000	
M (RBKC)	Early	12,000	Leisure	2,000	
Q (RBKC)	Early	4,000	Culture	2,000	
S (RBKC)	Early	3,000	Total	146,000	
T (LBHF)	Late	3,000			
U (LBHF)	Late	1,000			
W (LBHF)	Late	24,000			
X (LBHF)	Late	80,000			
Total		279,000			
Maximum Permitted Area (GEA m ²)		250,000			

Non-residential table 3

- 11.52 The floorspace availability for non-residential floorspace is further squeezed by the minimum housing delivery requirement of 176,000sqm within the maximum floorspace cap of 373,000sqm across the outline phases within LBHF, leaving a maximum of 197,000sqm for all uses not falling within Use Class C3 (conventional residential accommodation).
- 11.53 It is recommended that conditions are imposed on the parent permission requiring the submission and compliance or implementation of details including hours of operation (staff and customers), servicing, use of any outdoor spaces associated with the activities, the playing of amplified noise, and any other matters likely to give rise to impacts on residential amenity, local services and transportation networks, and public realm prior to commencement of any non-residential uses in the interests of safeguarding amenity and public safety.

Use Class E(g) Offices and Research & Development (R&D)

- 11.54 Within LBHF, two main clusters of employment floorspace are proposed, one located in the south of the site immediately to the north of Lillie Road within Development Zone B1 (Building WB07 and WB08) and Development Zone C (Buildings WB01 and WB02), and the other in the north of the site immediately adjacent to West Cromwell Road in Development Zone W (Buildings WK05 and WK07) and Development Zone X (Buildings WK03 and WK04), identified in blue on the plan shown below as figure *. The two clusters are identified as forming part of the Empress Place Innovation and Creation character area and the West Kensington Innovation Cluster in the Design and Access Statement respectively, also shown in figure *. This approach is consistent with paragraph 87 of the NPPF.



Figure 19 Upper floor predominant uses and employment clusters

- 11.55 These locations are among the most sustainable within the site in terms of public transport accessibility, being located in close proximity to West Brompton and West Kensington London Underground and/or London Overground stations respectively, as well as multiple bus routes on the neighbouring streets.
- 11.56 The Development Specification allows for up to 155,000sqm to be provided within the LBHF outline phases (in the context of the maximum parameters across both boroughs being 250,000sqm), with a minimum quantum of 50,000sqm within LBHF specified in Chapter 4A (Amended Proposed Development description) of Volume 1A: Main Environmental Statement Report Addendum, although the extent and distribution of delivery within those specified minimum and maximum floor area parameters would be influenced by delivery of other land uses across the site.
- 11.57 This represents a significant quantum of employment floorspace regardless of where delivery sits within the specified range, comparable to similar opportunity area sites including White City.
- 11.58 The application is supported by an Affordable Workspace Strategy, Commercial Strategy, Economic Inclusion Statement and Town Centre Use Impact Assessment, which have been independently assessed by AECOM. The supporting documentation has subsequently been supplemented with a Commercial Strategy Addendum (including an Office Impact Assessment), an Economic Inclusion Statement Clarification, and a Town Centre Impact Assessment Addendum.
- 11.59 These set out the approach taken to the delivery of employment uses across the site, including a concentration of provision within the two clusters referenced above alongside smaller offers elsewhere throughout the site, a focus on premium quality Use Class E(g) floorspace which is suitable for use by Climate Tech, Green Tech, STEMMM and creative/digital occupiers in particular to align with Upstream London priorities, and an assessment of the impact of delivery on existing town centres.
- 11.60 The delivery of employment floorspace as a key component of this scheme aligns with the objectives of **London Plan policy SD1 (Opportunity Areas)** to

achieve key regional regeneration aspirations in regard to delivery of employment opportunities and tackling spatial inequalities and economic barriers for local people, identifying the ECWKO as suitable for delivering up to 5,000 jobs (albeit with the West Kensington estate omitted from the scope of this application). This ambition to facilitate development on this site is supported by **Local Plan policies FRA (Fulham Regeneration Area) and FRA1 (Earls Court and West Kensington Opportunity Area)**, which recognise the creation of new jobs on the site, both as a direct result of the redevelopment works and through the delivery of new employment floorspace, as a key requirement of any proposal coming forward.

- 11.61 As such, the principle of a mixed-use development delivering employment floorspace is acceptable in principle, subject to consideration of the detailed proposals in accordance with the policies of the Development Plan, which will be assessed in detail at the RMA stage(s). This position is supported by the GLA, who conclude that the proposals for a substantial quantum of office floorspace would “contribute to meeting the employment objectives for the opportunity area, ensuring sustainable and inclusive growth and regeneration, in line with the Mayor’s overarching good growth principles”. The GLA further note that the application’s sector focus on Green Tech and proposals to provide a range of high-quality office and R&D buildings of various sizes supports the objectives set out in the Mayor’s Development Strategy.
- 11.62 It is noted that the Commercial Strategy identifies a need for the offer to “target emerging growth sectors rather than competing directly with existing schemes” in order to “stand out in the competitive landscape of London’s innovation hubs,” with the aim of developing “a diverse ecosystem of high-growth, innovative [emerging] sub-sectors,” identifying Climate Tech (or Green Tech) as the focus of this drive, with an emphasis on R&D, although it is recognised that a variety of different occupiers may be attracted to the site, including those within the life sciences, creative, AI, cybersecurity and technology, media and telecommunications and digital tech industries. Overall, this approach is welcomed and is considered to align with Development Plan aspirations for the site. As set out in Chapter 4A (Amended Proposed Development description) of Volume 1A: Main Environmental Statement Report Addendum there is a minimum quantum of 50,000sqm proposed within LBHF; in order to maximise the employment benefits of the proposal, this should be secured by way of condition.
- 11.63 Notwithstanding the above, there is limited information provided in respect of how the proposals will address the specific requirements of businesses falling within the Climate Tech sphere, although it is noted that the submission documents describe the proposed offer as including “co-working space enabling start up and scale up businesses, small affordable studios and workshops, and mixed lab/office/research and development space.” Such an approach accords with Development Plan policy aspirations.
- 11.64 Despite this, there remains concern that over-delivery of the employment floorspace as “general purpose” office space falling within Use Class E(g) will potentially prejudice the success of the site as an employment innovation hub

and at the same time cause harmful impact to the borough's existing office offer, through not providing sufficient differentiation of product. This concern is reflected in the light of the expansive list of potential occupiers identified, which (in addition to the groups mentioned above) includes sectors such as private equity and venture capital that might dilute the value of the site as a Clean Tech innovation hub for West London. In order to safeguard and maximise the employment and economic benefits of the proposal it is considered reasonable and necessary to put in place a clear mechanism to safeguard the delivery of an acceptable quantum of high quality lab space suitable for a regionally and nationally important innovation hub, including splitting out of Use Class E(g)ii and having minimum delivery requirements of R&D floorspace including "lab enabled" floorspace (for example, having movable power units, minimum floor to ceiling heights, and appropriate air handling systems) and other lab, research and grade A office floorspace types, which will allow for use by a wide range of occupiers, including those within Climate Tech associated industries and R&D, whilst not preventing its occupation by more conventional office occupiers. The futureproofing of the accommodation to be flexible and adaptable will maximise the potential for the envisaged employment benefits and planning policy objectives to be realised. This is alluded to in the Commercial Strategy Addendum, which states that occupiers within the target sectors "are looking for space that can accommodate a wide range and type of functions, and that is capable of being easily changed – short-term flexibility and long-term adaptability".

- 11.65 As such, a legal mechanism requiring the submission of a Commercial and Employment Delivery Strategy in support of RMAs for relevant Development Phases is suggested to ensure appropriate levels of delivery throughout the lifetime of the development and provide certainty that Development Plan objectives are being achieved in relation to delivery of employment uses on this Opportunity Area site, in line with the recommendation of the GLA.
- 11.66 A number of mechanisms are proposed to ensure that the economic benefits for existing and future occupiers are maximised. These include delivery of apprenticeships, work placements and internships, local procurement requirements, pathway bonds for local young people, and provision of a skills and training hub, which together deliver on the Development Plan objectives of **London Plan policy E11 (Skills and Opportunities for All)** and **Local Plan policy E4 (Local Employment, Training and Skills Development Initiatives)**, in line with the Council's wider Upstream London agenda.
- 11.67 The provision of affordable workspace as a key part of the employment offer is supported by **London Plan policy E3 (Affordable Workspace)** and the **LBHF Affordable Workspace SPD**. The applicant has proposed four potential offers; although these afford the same quantum of affordable workspace, they apply a sliding scale of discount, which aligns with a corresponding payment in lieu to support delivery of Upstream London, the Council's Industrial Strategy for inclusive economic growth:

A) 5% quantum @ 40% discount + £4m payment; or

- B) 5% quantum @ 35% discount + £6m payment; or
- C) 5% quantum @ 30% discount + £8m payment; or
- D) 5% quantum @ 25% discount + £10m payment.

- 11.68 The option to be secured in the S106 legal agreement is to be agreed at the discretion of the Council, in consultation with the applicant.
- 11.69 In addition to these, an office incubator space with a minimum floor area of 2,500sqm is proposed. This space is to be delivered as a long term meanwhile use contemporaneously with Phase 1 on land within Phase 4, and thereafter in purpose-built facilities within the boundary of LBHF in either the Empress Place Innovation and Creation character area or the West Kensington Innovation Cluster. The incubator space will deliver a range of employment floorspace provision suitable (in particular) for early-stage startups and scaleups operating within Climate Tech (or Green Tech) and other emerging industries. It will provide access to an innovation ecosystem and spaces in which to establish and grow, and support the delivery of Development Plan policies and the aspirations of Upstream London. These spaces could take the form of workshops and labs, with ancillary events spaces. The “meanwhile” incubator space shall be secured by way of an appropriate legal mechanism securing delivery (including phasing and operational strategy) and fit out, whilst the permanent provision will be secured by way of the RMA relating to the relevant Development Zone.
- 11.70 These economic benefits, together with appropriate monitoring, reconciliation and non-compliance processes, will be secured by way of an appropriate legal mechanism, which will ensure that the proposals actively provide local economic opportunities, and represent an acceptable offer given the viability of the proposed development.

Retail and Food and Beverage floorspace (Use Classes E(a), E(b), E(c) and sui generis)

- 11.71 The application seeks between 4,000sqm and 12,000sqm of flexible commercial floorspace falling within Use Classes E(a), E(b), E(c) and sui generis (which could include drinking establishments and hot food takeaways) across the outline phases.
- 11.72 The commercial offer is proposed to be located across all of the outline plots with the exception of Development Zones I, V1 and Y, which are intended to provide the community hall (Development Zone I), residential, co-living, PBSA, healthcare facilities and/or storage and distribution uses (Development Zone V1) and the West Kensington station interface and supporting facilities (Development Zone Y) respectively.
- 11.73 As set out above, this is a substantial quantum of town centre uses, and whilst the sequential test has been satisfied and the rationale for delivery as part of a mixed use redevelopment is understood in respect of its contribution to serving the needs of occupiers, supporting businesses and activating the public realm, the provision of an impact assessment in support of all RMA submissions

in order to fully assess the impact of delivery on existing centres is considered necessary in this case.

- 11.74 The layout, design, location and detailed land uses will be subject to consideration against the relevant Development Plan policies at the time of determination of the RMA applications pertaining to each of the outline phases, informed by the parameter plans and design codes.

Culture (Use Class F1/sui generis)

- 11.75 The provision of cultural uses as a critical element of the redevelopment proposals is supported by **London Plan policy HC5 (Supporting London's Culture and Creative Industries)** and **Local Plan policies CF1 (Supporting community Facilities and Services)** and **FRA1 (Earls Court and West Kensington Opportunity Area)** and is welcomed as a positive response to the very special history of the site as a cultural venue of international renown.
- 11.76 The application is supported by a Cultural Strategy (rev 1), which sets out the context, offer and approach to delivery, which is only within the outline phases of the development. This document has been independently reviewed by AECOM on behalf of the Council.
- 11.77 The cultural floorspace, for which a minimum yield of 500sqm and maximum of 7,000sqm within LBHF (of a total of up to 14,000sqm across both boroughs) is specified in the Chapter 4A (Amended Proposed Development description) of Volume 1A: Main Environmental Statement Report Addendum, is proposed to be distributed across Development Zones B1, C, G1, N, P, T, UW, X and Z with a maximum potential plot yield of up to 4,000sqm on Development Plot U. These would be focussed on two main nodes with LBHF at Empress Place and Lillie Sidings (and West Brompton Crescent within RBKC), with smaller spaces elsewhere but predominantly along the central spine of the site.
- 11.78 The strategy puts forward a philosophy of creating a cultural ecosystem of facilities of various capacity for the production and consumption of culture which can support a range of activities and events, although the precise nature of these spaces will not be finalised until the RMA applications are determined. They could, however, include rehearsal and performance venues and gallery or exhibition spaces, all of which are expected to incorporate the flexibility to accommodate a variety of activities and experiences.
- 11.79 Given the degree of uncertainty as to where these spaces will be located within the development, the precise nature of the intended uses, and their physical relationship to neighbouring land uses (which may be noise-sensitive), it is considered appropriate to require the submission of details of operating hours and management by way of condition attached to the scope of the parent permission, although it is anticipated that these cultural resources will make a substantial contribution to the night-time economy of the local area. Conditions requiring sound proofing between cultural facilities and adjoining residential uses are recommended, although it is likely that such direct relationships should be avoided at the design stage in the interests of good placemaking.

11.79 in order to secure the intended cultural benefits of the application, an appropriate legal mechanism requiring the submission of a Cultural Implementation Strategy in support of the RMAs relating to relevant Development Zones, including details of delivery is suggested in the interests of the Council and GLA's aspirations to build on the legacy of Earls Court as a major cultural destination.

Social Infrastructure – Community (Use Class F1)

11.80 The delivery of community facilities to support, and mitigate the impacts of, the development is supported by **Local Plan policies CF1 (Supporting Community facilities and Services)**, and **strategic policy FRA (Fulham Regeneration Area)**, which chime with paragraph 98 of the NPPF.

11.81 A community centre and public toilets are being provided within Development Zone H, which is being considered in detail and discussed above. In addition to this, Development Zone I, which is located to the northwest of WB05 T2 and being considered at this stage in outline with all matters reserved, is intended to provide a community hall with a GEA of 350sqm, of which a minimum of 300sqm would fall within Use Class F1.

11.82 This building will be sited in a key location within the development, shown below in figure 20 in the illustrative Early Phases and All Phases scenarios, located to the north of a reconfigured Multi Use Games Area (MUGA) serving the development and the wider West Kensington estate, and addressing both the community centre at ground floor level within WB05 T2 and Aisgill Avenue. To the north of the building will be Aisgill Gardens, with a second, smaller area of landscaped public realm between the two proposed community facilities.



Figure 20 Illustrative Early Phases and All Phases scenarios

11.83 The provision of a community hall is welcomed, although it is understood that part of the land on which the building will stand is within the separate ownership of the Council, which will require a separate land share arrangement to be entered into separately of the planning permission, which is also the case with the MUGA, which the applicant team have undertaken to upgrade as part of the works required to deliver this part of the site (including re-provision and relocation of the outside gym), the delivery of which should be secured by way of an appropriate legal mechanism.

11.84 Elsewhere, community spaces are proposed within Development Zone U. The maximum floorspace for this provision is quantified within the Development

Specification as 1,500sqm, which is also the overall maximum cap for community floorspace across the LBHF outline phases, which mathematically could “subsume” the delivery of Development Plot I, which would be regrettable, although unlikely given the anticipated phasing programme.

- 11.85 As with other uses proposed at outline stage, any forthcoming RMA application will be required to be considered in full against the provisions of any relevant Development Plan policies at the time of determination, and appropriate conditions may be imposed at that time.

Education and childcare (Use Class E(f)/F1(a))

- 11.86 Consideration of the impacts of development proposals in terms of education and childcare, and support for the provision of additional facilities, is set out in **London Plan policies GG3 (Creating a Healthy City) and S3 (Education and Childcare Facilities)** and **Local Plan policy CF1 (Supporting Community Facilities and Services)**.
- 11.87 A maximum of 45,000 sqm of education and childcare (Class E(f)/F1(a)) floorspace is proposed across the outline components of the applications. This includes up to 25,000 sqm in LBHF within Development Zones C and/or W. Whilst the floorspace allowance within LBHF has been provided primarily to allow the delivery of higher education facilities to complement the employment (R&D) offer and enhance the quality of the site as an innovation hub, it is acknowledged by the applicant in the Planning Statement that this floorspace could be delivered as a school should demand change. The level of demand resulting from forthcoming phases of development will be reviewed at the time of any RMA submission relating to Development Zone U in order that any increase in demand may be captured, and such a mechanism should be secured by way of an appropriate legal agreement.
- 11.88 The findings set out in the socio-economic chapter of the Environmental Statement indicate no additional requirement for primary or secondary school education floorspace as a result of the anticipated child yield of the development, although a minor adverse effect in terms of secondary education is noted. However, this is not reflected in the comments of the local education authority who identify additional educational needs within the borough arising from the proposed development, including enhancement and improvements to accessibility of existing settings to expand capacity and increased demand for SEND services. As such, a financial contribution of £3.6million towards education provision has been agreed, and should be secured by way of an appropriate legal mechanism. Alongside this, outreach programmes will be delivered, which should also be secured within the S106 agreement.
- 11.89 Early years childcare provision is proposed within the detailed component of the RBKC application, comprising a 340 sqm Use Class E(f) nursery located on the ground floor of Development Plot EC06, facing on to The Table.
- 11.90 In addition to this, an early years nursery with a minimum size of 340sqm GEA and to be delivered no later than occupation of 1,500 homes in LBHF is also proposed to be delivered in LBHF, i.e. in addition to RBKC nursery. This would

be captured via planning obligations set out in the Heads of Terms of the S106 Agreement. Further provision may come forward proportionate to the scale of residential and commercial floorspace to be delivered, and the need for this should be monitored by way of the legal agreement.

- 11.91 As with other uses which are sought at outline stage, the detail of proposals shall be considered in accordance with the up-to-date Development Plan at the time of determination of the relevant RMA.

Healthcare and Older Persons Care Home provision (Use Class C2)

- 11.92 The description of development as set out in Chapter 4A of the Environmental Statement badges the accommodation falling within Use Class C2 as “hospital” and “care home”.
- 11.93 **London Plan policies GG3 (Creating a Healthy City) and S2 (Healthcare and Social Care Facilities) and Local Plan policy CF1 (Supporting Community Facilities and Services)** seek to safeguard delivery of healthcare services and infrastructure, and maintain and improve the health outcomes of London’s population.
- 11.94 There is no specific London Plan policy relating to care home provision falling within Use Class C2 (residential institutions), and such provision is expressly excluded from the scope of **London Plan policy H13 (Specialist Older Persons Housing)**, although Local Plan Policy HO7 is supportive of the delivery of specialist housing for older persons, including care homes, where there is an identified need and where the proposed development would not be detrimental to the amenity of the local area or local services. The principle of the provision of care home accommodation, subject to demonstration of need, ensuring that proposals respond positively to the specific requirements of the occupier group and the assessment against Development Plan policies that seek (amongst other matters) to manage the relationship between differing land uses and their surroundings (including demand on services), is accepted.
- 11.95 Consent is sought in respect of Use Class C2 floorspace for up to 25,000sqm of hospital floorspace and 40,000sqm for care home provision within the outline phases within LBHF. The Development Specification allows for delivery of the hospital/healthcare provision within Development Zone W, and the proposed care home provision within Development Zones C, T, V1 and W. These are located along the main spine of the site as a whole, and would have good access to services, facilities and open space both within the site and beyond its boundaries.
- 11.96 In terms of healthcare impacts flowing from the proposal, the Environmental Statement finds some additional level of primary and secondary healthcare need as a result of the development, noting that some of this could potentially be absorbed by existing surgeries alongside financial contributions towards additional primary healthcare capacity.
- 11.97 Notwithstanding the above, the NHS has provided HUDU modelling which, in respect of the detailed element, indicates that the primary care floorspace

requirement would be 83 sqm, although it is noted that this demand could be met through the conversion of existing non-clinical floorspace in practices (records or storage rooms) and enhanced digital infrastructure (remote consultation facilities) in the existing primary care estate. Depending on the timescale and delivery of the detailed component, the Integrated Care Board consider this space could be accommodated at either the North End or North Fulham practices, subject to the securing of a financial contribution of £417,950 by way of an appropriate legal mechanism to mitigate the primary care infrastructure demands associated with the detailed element and to create the additional clinical capacity.

- 11.98 Calculations relating to the delivery of the whole scheme estimate the primary care floorspace demand would increase to 439sqm. In the event that on-site facilities appropriate for the use of NHS practitioners are not provided on site in the later outline phases, a financial contribution of £3.5million based on HUDU calculations for the cost of delivering acceptable mitigation for the primary care infrastructure demands associated with the whole scheme has been agreed and shall be secured by way of an appropriate legal mechanism.
- 11.99 Any proposal for a Use Class C2 care home for older persons coming forward as part of a future RMA for one of the relevant outline phases would need to be supported by evidence of the need for the proposed facility, in accordance with relevant planning policy. It is noted that paragraph 4.13.4 of the supporting text to London Plan Policy H13 provides criteria to distinguish such accommodation from older persons' housing within Use Class C3, and any RMA for this use would need to demonstrate compliance with these criteria, and would be assessed in terms of the specific requirements of care homes including the need for high quality communal spaces, calm environments and provision for a potentially elevated level of servicing due to additional medical needs of occupiers.

Leisure (Use Class E(d)/sui generis)

- 11.99 Consideration of development proposals for leisure facilities and uses is set out in **London Plan policies GG3 (Creating a Healthy City) and S3 (Education and Childcare Facilities)** and **Local Plan policy CF1 (Supporting Community Facilities and Services) and CF3 (Enhancement and Retention of Community Uses)**.
- 11.100A maximum of 4,000 sqm of leisure floorspace (Class E(f)/F1(a)) floorspace is proposed across the outline components of the application in LBHF within Development Zones B, N, P, T, U, W and/or X.
- 11.101 Very limited information is provided as to what the leisure (indoor sports and recreation) activities that might be explored might comprise, however safeguards are in place in the form of conditions detailed elsewhere in this report. As with other uses which are sought at outline stage, the detail of proposals shall be considered in accordance with the up-to-date Development Plan at the time of determination of the relevant RMA.

Hotel

- 11.102 The proposed development includes the provision of hotel floorspace of up to 32,000sqm of Use Class C1 floorspace, equivalent to approximately 400 bedrooms. Within LBHF this includes up to 20,000 sqm (up to 250 hotel rooms) and 12,000 sqm (or up to 150 hotel rooms) in RBKC.
- 11.103 The provision of hotel accommodation, in general and specifically on this site, is supported by **London Plan policies E10 (Visitor Infrastructure) and SD6 (Town Centres and High Streets)**, alongside the Mayor of London's Growth Plan for London and **Local Plan policies FRA1 (Earls Court and West Kensington Opportunity Area) and E3 (Provision for Visitor Accommodation and Facilities)**.
- 11.104 Officers support the view that the provision of hotel floorspace as part of a mixed-use development of the site in accordance with the relevant Development Plan policies would serve both the business and tourist markets in this location and contribute to the vitality of the mix of uses on the site, subject to conditions restricting the hotel accommodation to be used for purposes falling within Use Class C1 in order to safeguard the economic benefits of the proposed accommodation and submission and implementation of hotel management plans.

Storage and distribution

- 11.105 Planning permission is sought for up to 16,000sqm of Class B8 storage and distribution floorspace across the outline components of the masterplan, with up to 6,000 sqm in RBKC and up to 10,000 sqm in LBHF. Possible uses indicated within the application submission include warehousing or other storage, as well as logistics or data centres, and the illustrative masterplan includes a 'last mile logistics' facility within Plot EC07. Within LBHF, the provision is sought within Development Zones V1 and X.
- 11.106 Alongside the NPPF (paragraph 87) recognise the importance of providing land for distribution and logistics use, which aligns with **London Plan policies E2 (Providing Suitable Business Space) and E4 (Land for Industry, Logistics and Services to Support London's Economic Function)**, and **Local Plan policy E1 (Providing for a Range of Employment Uses)**, although it is recognised that the site may not be suitable for traditional storage and distribution uses, and that proposals would need to be carefully considered against Development Plan policy at RMA stage, particularly in relation to impacts on amenity and transportation.
- 11.107 The GLA have confirmed that there are no strategic concerns with regards to the quantum being sought. The demand for more efficient and sustainable last mile logistics solutions is understood and supported by Development Plan policy. The inclusion of a commercial logistics hub would potentially reduce vehicle trips, increase sustainable delivery modes, improve air quality on-site and within the local area and reduce carbon emissions, which are all impacts to be welcomed. A data centre use is identified in certain flexible plots (e.g. WK02/04, WK03 and WK06 in LBHF and EC20 in RBKC). This is in response to rapid changes in technology and automation resulting in significant increase in the amount of data being produced, stored and accessed. The potential

provision of such facilities is therefore included in wider development and would be considered in detail, including in respect of quality and sustainability of design and utilities requirements, at the RMA stage.

Other Sui Generis Uses

- 11.108 The site allocations allow for the provision of a mix of non-residential uses within the outline component for a range of potential Sui Generis land uses to come forward. The list of potential uses could include cinemas, drinking establishments, theatres and nightclubs that form part of the wider retail, cultural and commercial strategy. The uses are defined in greater detail in the submitted Development Specification document. These uses would contribute to the creation of active, vibrant and attractive ground floor frontages onto the public realm, in accordance with planning policy objectives however a balance needs to be struck in terms of the flexibility provided and controls required via planning conditions.
- 11.109 The assessment of their suitability for a particular location within a Development Zone or Plot would be considered at the RMA stage, taking account of the composition of neighbouring land uses.

Conclusion – land use principles

- 11.110A comprehensive mixed-use, residential-led redevelopment of this largely vacant, brownfield site within an Opportunity area is proposed, which will contribute to the delivery of strategic planning aspirations in terms of place-making. This is supported by planning policy at the local, regional and national levels, and accords with the Mayor's objectives in relation to opportunity areas and good growth principles as codified in London Plan policies GG1 (Building strong and inclusive communities), GG2 (Making the best of use of land), policy GG4 (Delivering the homes that Londoners need), GG5 (Growing a good economy) SD1 (Opportunity Areas), and Local Plan aspirations for the delivery of homes, employment uses, community infrastructure and other non-residential uses on this generational site, as set out in Local Plan policy FRA1 (Earls Court and West Kensington Opportunity Area) and strategic policy FRA (Fulham Regeneration Area).
- 11.11 The proposed development would provide a minimum yield of high-quality conventional housing comprising a range of new homes of varying sizes, types and tenures, including the provision of 35% affordable housing by habitable room, encompassing a range of different affordable products that are genuinely affordable at the point of delivery. The submission has been accompanied by an FVA which has been independently scrutinised, and it is concluded that the proposal delivers the maximum reasonable level of affordable housing that can be achieved under current market conditions given the substantial complexities and constraints on the site. The proposal therefore accords with the NPPF, London Plan policies GG4 (Delivering the homes that Londoners need), H1 (Increasing housing supply), H4 (Delivering affordable housing), H15 (Purpose-built student accommodation) and H16 (Large-scale purpose-built shared living) and Local Plan policies HO1 (Housing supply), HO3 (Affordable housing) and HO9 (Student accommodation).

11.112 These homes would be delivered alongside non-residential uses that would generate a substantial number of new jobs, attract significant inward investment and provide a wide range of services and facilities, including important cultural facilities and social infrastructure. Overall, officers consider that the proposals will create a mixed and balanced community for people who will live, work and visit the site and provide significant wider benefits to the local communities in borough, RBKC and beyond at a regional, national and even international scale. The proposal is therefore in accordance with the NPPF, London Plan policies SD6 (Town centres and high streets), SD7 (Town centres: development principles and Development Plan documents), S2 (Healthcare and social care facilities), S3 (Education and childcare facilities), S5 (Sports and recreation facilities) and S6 (Public toilets), E1 (Offices), E2 (Providing suitable business space), E4 (Land for industry, logistics and services to support London's economic function), E8 (Sector growth opportunities and clusters), E10 (Visitor infrastructure), E11 (Skills and opportunities for all), HC5 (Supporting London's culture and creative industries) and HC6 (Supporting the night-time economy) and Local Plan policies E1 (Providing for a range of employment uses), E3 (Provision for visitor accommodation and facilities), E4 (Local employment, training and skills development initiatives) TLC1 (Hierarchy of town and local centres), CF1 (Supporting community facilities and services) and CF3 (Enhancement and retention of community uses).

12 DESIGN, HERITAGE AND TOWNSCAPE

Design

- 12.1 **The NPPF** seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. The NPPF also requires that proposals should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
- 12.2 **The NPPF** states that good design is a key aspect of sustainable development and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and paragraph 135 sets out that planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for

existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- 12.3 **Chapter 3 (Design) of the London Plan 2021** seeks to secure the delivery of good design through a variety of ways. Policies D3 (Optimising Site Capacity through the Design-Led Approach), D4 (Delivering Good Design), D6 (Housing Quality and Standards), D8 (Public Realm) and D9 (Tall Buildings) are particularly relevant to the consideration of this application. Policy D3 highlights that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, through careful consideration of issues such as form and layout, experience, alongside consideration of quality and character. Policy D4 highlights that where appropriate, visual, environmental and movement modelling / assessments should be undertaken to analyse potential design options for an area, site, or development proposal. These models, particularly 3D virtual reality and other interactive digital models alongside use of design review should, where possible, be used to inform decision-taking, and to engage Londoners in the planning process. Policy D6, promotes a series of quality standards that new housing development should aim to achieve. Policy D8 sets out a series of criteria to ensure that the public realm is well-designed, safe, accessible, inclusive, attractive, and well-connected. Policy D9 promotes a plan-led approach to tall buildings and a framework to assess the impacts of such developments.
- 12.4 **Local Plan Policies DC1, DC2 and DC3** are particularly relevant to the assessment of design. Policy DC1 (Built Environment) states that all development within the borough should create a high-quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that considers how good design, quality public realm, landscaping and land use can be integrated to help regenerate places. Policy DC2 (Design of New Build) sets out to ensure that new build development will be of a high standard of design and compatible with the scale and character of existing development and its setting. Policy DC3 (Tall Buildings) identifies four areas within which tall buildings may be appropriate, including the Earls Court & West Kensington Opportunity Area; the policy also sets a framework to assess proposals for tall buildings in those areas.

Introduction

- 12.5 The Earl's Court development site forms part of the Earl's Court and West Kensington Opportunity Area, within the wider Fulham Regeneration Area, as designated in the Local Plan (2018) and the London Plan (2021). As such, the site has been identified as a suitable location for higher density residential-led mixed-use development, with the potential for tall buildings. The site is partly located in Hammersmith & Fulham and partly in Kensington & Chelsea.
- 12.6 Local Plan (2018) Policy FRA1 expects development proposals for the Opportunity Area to provide: a mix of land uses; social, physical, environmental and transport infrastructure; improvements to existing estates; green corridors and public open spaces, including a central park; and to recognise the scope

offered by its scale and location to create a new sense of place and range of densities, as well as the scope for tall buildings.

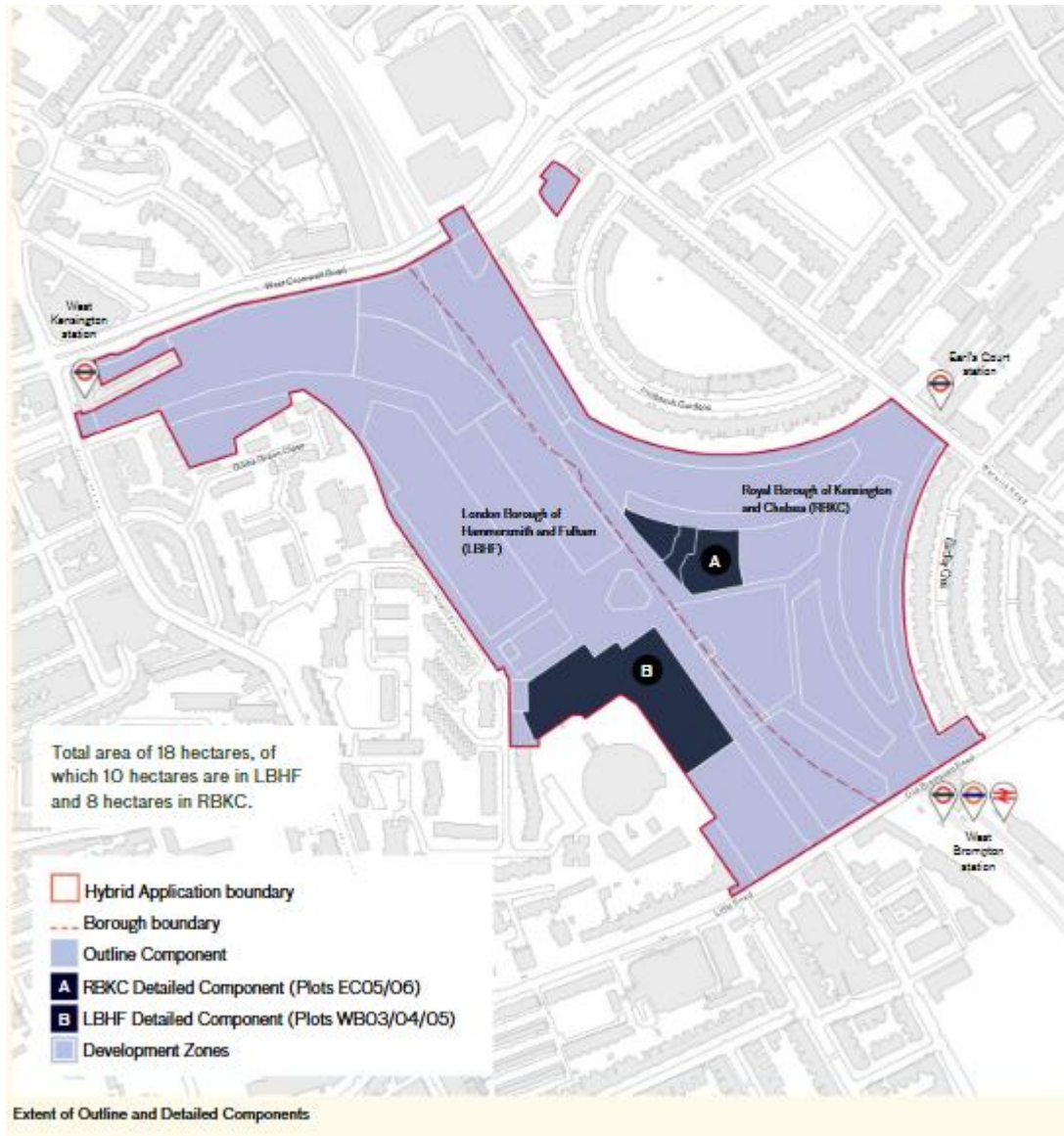
- 12.7 London Plan (2021) Policy D3 requires that all development must make best use of land by following a design-led approach that considers the most appropriate form and density of development, taking account of a site's context, capacity for growth and its connection to jobs, services and infrastructure. Good design, developed through meaningful engagement and collaboration with local communities, is considered essential to Policy D3.
- 12.8 The proposed masterplan for Earl's Court has been developed over a number of years via a thorough process of design analysis and scrutiny by local community and amenity groups, formal design review panels and LPA officers at Hammersmith & Fulham, Kensington & Chelsea and the GLA.

Masterplan and its context

- 12.9 The Earls Court development site is bounded by West Cromwell Road (A4) to the north, Lillie Road to the south, residential properties on the West Kensington and Gibbs Green Estate and Beaumont Avenue to the west and the large Empress State (MOPAC) building to the south-west. In RBKC, the development site is enclosed by residential properties on Philbeach Gardens, Eardley Crescent and Warwick Road and to the south by Old Brompton Road. The land is largely a brownfield site, comprising railway infrastructure (above and below ground level) and a maintenance/training facility by London Underground Ltd (LUL) and Transport for London (TfL).
- 12.10 The site is not in a conservation area except for a small part located within the Barons Court Conservation Area (northwestern section), and the Philbeach Conservation Area in RBKC (southeastern section). The masterplan site is surrounded by 17 conservation areas and several listed and locally listed buildings.
- 12.11 The District Line, Piccadilly Line and West London Line all dissect the wider site. These result in no build / limited build zones due to infrastructure asset protection requirements and structural limitations / loading restrictions. There are substantial level changes across the site ranging up to 8m. East-west movement across the site is constrained by the West London Line Railway. A green corridor runs through the site within the cutting of the West London Line to the north and south of the table structure, linking Lillie Road with West Cromwell Road.
- 12.12 The local area is predominantly residential in character with varied architectural styles including Victorian era terraced homes, mansion blocks and modern buildings contained in a traditional network of streets. The West Kensington and Gibbs Green estates comprise a variety of post-war housing types in a more irregular urban layout.

Application structure – Design implications

- 12.13 From a design perspective, the planning application has been submitted as a hybrid planning application, to both boroughs.



- 12.14 The application is also supported by a **site-wide Landscape Masterplan** which gives illustrative details of key public spaces, routes, and connections which could be delivered by the development. This includes detail of the repurposing of 'the table' to provide the most significant public space which straddles the boundary shared with RBKC.
- 12.15 Overall, the phasing of the masterplan seeks to reaffirm current land ownership across the site, and the details of the Landscape Masterplan include additional elements to deal with details such as boundary treatments, routes etc., if later phases of development are delayed or not ultimately delivered.

- 12.16 The majority of the tallest buildings occupying the site are within LBHF. Some of these tall buildings are intended to be delivered as part of Phase 1 with later phases due to come forward as part of future reserved matters applications which would include full detail of key areas of landscaping and public realm.

Masterplan approach (Site wide)

- 12.17 The proposed masterplan provides a comprehensive vision for the site including information about key deliverables in terms of key routes, public spaces and built form. Whilst much of the information is provided only in outline at this stage, the information provided is intended to help inform and manage the future reserved matters applications, in a similar format to other developments following a masterplan approach found within our other regeneration areas.

Layout, access and permeability

- 12.18 The masterplan proposes a series of pedestrian and cycle routes to reconnect and restitch the site to its surrounding context, replacing an inaccessible, partially vacant site with an open and permeable development overall.
- 12.19 The main north-west access route will connect West Kensington station to West Brompton station through the new boulevard route. From east to west, a new route will provide additional connectivity between the existing West Kensington/Gibbs Green estates, across the retained structure of 'the table' through to Earls Court station.
- 12.20 The masterplan also allows for a new Bio-Line to be formed by decking over the southern section of the existing railway cutting, subject to agreement with Network Rail. This could provide an additional ecological and controlled pedestrian connection between West Brompton Square and the Table Park. An existing service road access off Cromwell Road in the north will be retained to serve the RBKC portion of the site.
- 12.21 Lillie Bridge Depot lies wholly within LBHF and occupies most of the northern extent of the combined development site. It will remain operational for a substantial portion of the proposed development timescale and will require essential vehicular access off Beaumont Avenue in the north and extra-long vehicle access off Lillie Road in the south until such time as its operations have been relocated. These key vehicular access routes will be retained within the proposed masterplan.
- 12.22 Empress Place provides additional access off Lillie Road. There is a pedestrian access gate off Aisgill Avenue into the existing community centre on the site but the western boundary with the Gibbs Green and West Kensington estates is otherwise limited to pedestrian and cycle access routes.
- 12.23 The Empress State Building is located towards the southwest corner of the site and its boundary with the Earl's Court development will remain secure and isolated from the redevelopment of the Earls Court site.

Character Areas - Public realm, public space, and landscape

12.24 The proposed public realm and landscape design is formulated around the seven-character areas into which the overall development site is divided. Five of these cover the extent of the site that lies within LBHF: The Table, Empress Place, Aisgill Gardens, Lillie Sidings and West Kensington.



12.25 **The Table** is the centrepiece of the masterplan, comprising the Table Park, the Cascades and the proposed Bioline (which could be delivered in future). The other character areas converge towards this space. The Table Park will be the primary destination public open space, characterised by its lawns and extensive areas of soft landscaping and mature trees. The proposed Bioline would be an ecological green corridor connecting the park to West Brompton Square.

12.26 A fundamental design challenge for the masterplan is how to accommodate changes in level of up to +8m between the edges of the site and the retained existing concrete structures in the Table character area, at the intersection of the east-west and north-south routes. Ramps, steps and passenger lifts are carefully integrated into the terraced public realm of the Cascades to manage the level changes and connections between the Table and the Aisgill Gardens,

Lillie Sidings and Empress Place character areas. These elements of the scheme have been designed to ensure inclusive access.

- 12.27 The **Empress Place** character area forms the main entrance to the development from the south, via the Empress Place Boulevard, Empress Place Passage and Lillie Road Edge. The boulevard is its primary public realm and is an extension of the existing street from Lillie Road which forms a gentle incline towards the Table Park and the Cascades. Empress Place will have an urban feel, being lined by substantial commercial, residential and cultural use buildings as well as the edge of Table Park. This area also includes provision of the retained buildings forming Empress Place.
- 12.28 **Aisgill Gardens** will be a community green opening onto Aisgill Avenue and connected to the Cascades and Lillie Sidings Square. This is an area which will be subject to delivery following a phased approach, owing to a significant proportion of the site being part of the depot land in TfL ownership. In the shorter-term meantime, it is expected that the community green would be partially delivered within Phase 1 of the development and would be separated from Lillie Road Depot by semi-permanent, secure hoarding. This space will become an integral part of the interface of the development with the existing West Kensington and Gibbs Green estates.
- 12.29 Aisgill Gardens also includes the proposed new community building and reprovision of an improved MUGA, to be delivered within Phase 1 of the development.
- 12.30 The **Lillie Sidings** character area lies north of the Cascades within the existing Lillie Bridge Depot, and its main spaces of focus are Lillie Sidings Square and the West Kensington Boulevard Link. Lillie Sidings Square will be a destination public square flanked by commercial and retail frontages and will reflect the area's industrial and transport heritage. It will have a mix of hard and soft landscaping, including a tree-lined primary north-south route connecting the Empress Place boulevard with the West Kensington Boulevard Link.
- 12.31 The western edge of the square will be framed by predominantly residential perimeter block buildings, behind which Aisgill Lane will provide a mix of essential vehicular access and pedestrian and cycle priority routes on the site's boundary with the West Kensington and Gibbs Green estates. New road levels will be aligned with estate road levels to facilitate the creation of new pedestrian and cycle connections between the estates and Earl's Court. The masterplan also anticipates the creation of a more permeable boundary treatment along Aisgill Avenue, subject to future consultation with estate residents to determine the detailed design of these elements. Again, delivery of these connections would require the TfL depot land to be brought forward for development.
- 12.32 The **West Kensington** character area forms the northern extent of the masterplan and is bounded primarily by the Cromwell Road, North End Road and Beaumont Avenue. Its main spaces include West Kensington Square, West Kensington Boulevard and West Kensington Place South. West Kensington Square is proposed as a new square on the corner of North End Road and

Beaumont Avenue that would accommodate a new entrance to West Kensington tube station and form a gateway into West Kensington Boulevard, which is the northern section of the primary north-south route through the masterplan. West Kensington Place South will be a pocket of landscaped open space that provides opportunities for play.

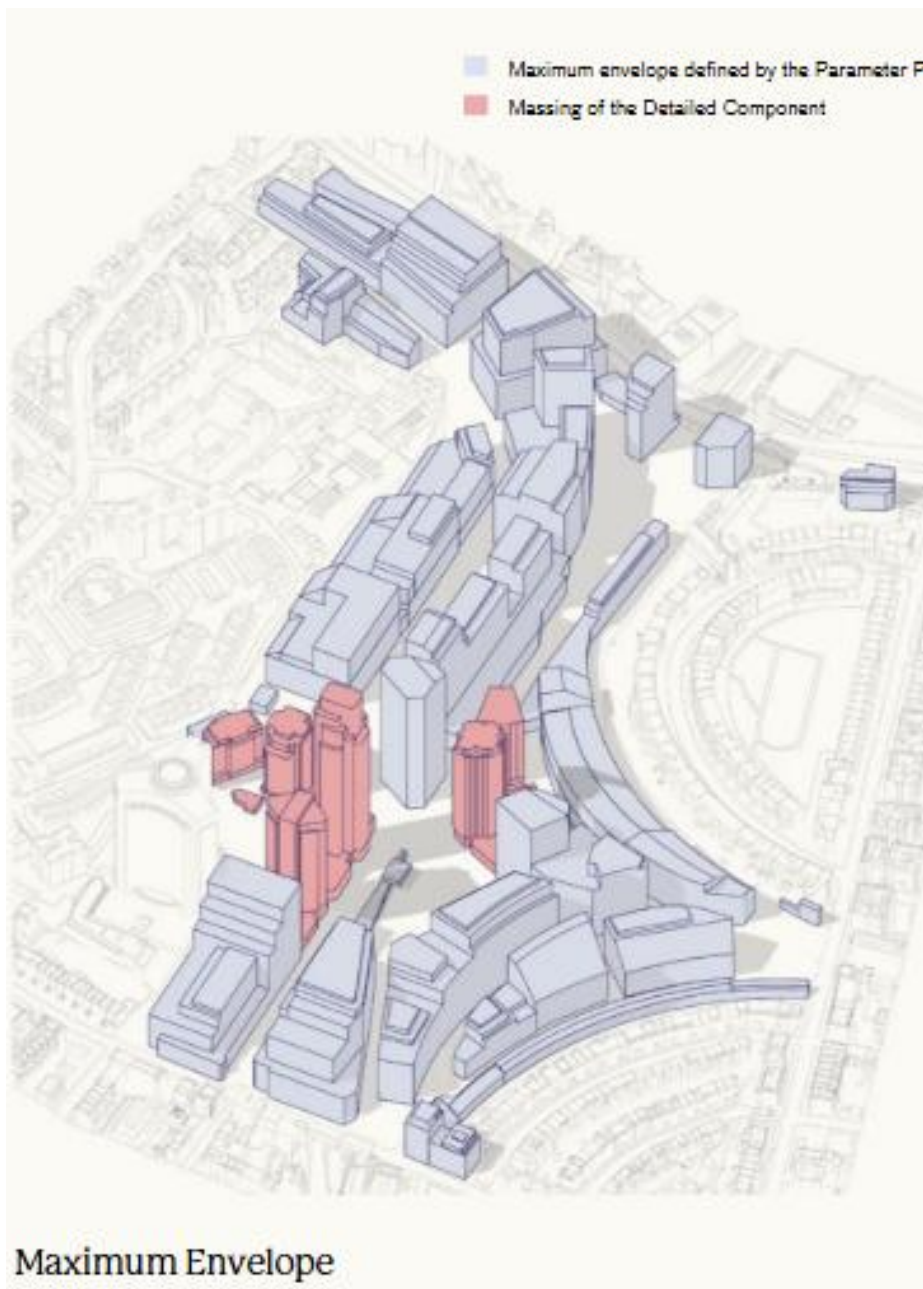
- 12.33 The West Kensington character area proposes to create a new pedestrian and cycle access point in Gibbs Walk, on its boundary with the Gibbs Green estate, that would give estate residents easier access to West Kensington tube station and Beaumont Avenue. West Kensington Place North will incorporate an existing pedestrian connection to the Cromwell Road into the masterplan public realm and network of accessible routes. Again, delivery of these spaces would require the TfL depot land to be brought forward for development.
- 12.34 Overall, officers consider that the masterplan for the site could (subject to delivery in its entirety) deliver a meaningful series of new public spaces at a variety of scales to benefit the wider area. Alongside this, the masterplan would also provide a series of permeable and legible pedestrian and cycle routes to connect the site to existing communities and to connect key spaces/destinations within the site. It would also promote stronger connections to local transport infrastructure.

Scale and Massing

- 12.35 The outline elements of the masterplan are subject to maximum extents of scale, height and built form as defined by the Parameter Plans supporting the application. Further information about the maximum scale of the development is illustrated in the Design Code submitted with the planning application and conveyed visually in the Illustrative Masterplan.
- 12.36 Cumulatively the Parameter Plans set out the maximum extent of building lines for Development Zones and the minimum extent of public realm to be provided between them. They also contain indicative information about the sub-division of Development Zones into building plots, with detail of additional routes, and areas of public realm to be delivered because of sub-division. Between them, these Parameter Plans describe three-dimensional volumes within which any future development must be contained and constrained.
- 12.37 The shape and extent of these volumes have been determined by an analysis of local context and the potential cumulative impacts on existing development in terms of sunlight, daylight and overshadowing (which are described in detail elsewhere in this report). That analysis informs the proposed masterplan approach to scale, height and built form, namely that building heights are kept low towards the western and eastern site boundaries and rise upwards towards centre of the site, adjacent to the existing Empress State Building, and the new public space forming Table Park.
- 12.38 Two clusters of tall buildings are proposed, one at the centre of the masterplan forming a primary cluster of tall buildings adjacent to the neighbouring Empress

State Building. A secondary tall building cluster is situated towards the northern extent of the site fronting the A4, Cromwell Road.

- 12.39 The Empress State cluster includes the three plots within LBHF and two within RBKC that form the detailed components of the hybrid planning applications made to both Councils respectively. The remaining tall buildings are part of the outline component.
- 12.40 The assessment of the impacts of the tall buildings, specifically in terms of their functional, visual, and heritage impacts, is provided in the next sections of this report.



Architectural quality and character

12.41 The site-wide Design Code describes ten different building archetypes that relate broadly to their location, scale and role within the masterplan. The Design Code also provides more specific design guidance at character area level that responds to the local context of those character areas. The Design Code refers to the following typologies of buildings:



- "Smaller scale" and "Mid-scale" archetypes are similar in scale, character and function to the traditional terraces and mansion blocks that constitute much of the site's surrounding context. Mid-scale buildings are proposed within the West Kensington character area and would complement the existing Victorian mansion blocks on Beaumont Avenue.
- "Large-footprint", "Perimeter blocks" and "Transition blocks", which constitute much of the proposed development within LBHF, are broadly similar in terms of building footprint and range of building heights but differ in overall form and architectural character. "Large-footprint" buildings are intended to provide deep plan floorplates for a range of non-residential uses. "Perimeter blocks" and "Transition blocks" are intended to accommodate predominantly residential uses arranged around raised central courtyards.

- "Large-footprint" and "Transition blocks" may be put to a flexible mix of predominant uses, as set out in the Development Specification, and the Design Code gives guidance as to how their form and architectural character should respond to these different uses.
- "Common base" blocks comprise individual taller buildings sitting above a shared, continuous base or podium that defines the edge of the public realm. This type applies to outline plots WK08 and WK09, on the eastern edge of Lillie Sidings Square, as well as the three LBHF plots and two RBKC plots within the Phase 1 detailed component of the masterplan.
- "Standalone" and "Pivot" are freestanding, small footprint buildings. Standalone buildings are located on the site's northern, A4 boundary and include plot WK06 in LBHF and two plots in RBKC. The Pivot building is a unique tall building within LBHF (WB06) and occupies a strategic position in the masterplan, at the intersection of the main north-south and east-west routes and the head of the Table Park.
- The "Table Edge" building type occupies the space between the different levels of the Empress Place "boulevard" and the Table Park that is created by extending the Table Park's supporting deck to the west. Its function is to frame and activate the edge of Empress Place.
- "Pavilions" are small buildings performing locally relevant functions within the public realm, such as enclosing public lifts on Empress Place or containing a potential new community hall off Aisgill Gardens.

Architectural treatment and materials

12.42 The Design Code provides built form design guidance under the headings of:

- Layout and massing
- Frontages and facades
- Tone and materiality

12.43 Design Code guidance controls the development of the design of relevant building typologies and archetypes from basic concepts into considered architectural schemes that respond to their location, function and building use within the masterplan. It covers topics such as articulation of building blocks, parapet treatments, active frontages, façade expression, complementary materials and robustness of detailing.

12.44 Officers consider that this guidance provides sufficient clarification to assist the evolution of the detailed design of future phases of the development, the Design Code would facilitate engagement between future applicant design teams and the local planning authority ahead of submission of reserved matters applications. The detail within the Design Code would provide a robust, yet flexible approach to these plots that would allow for changes to policy, guidance and building regulations which could be brought forward within the timescale for delivering the development.

Phase 1 – Detailed design

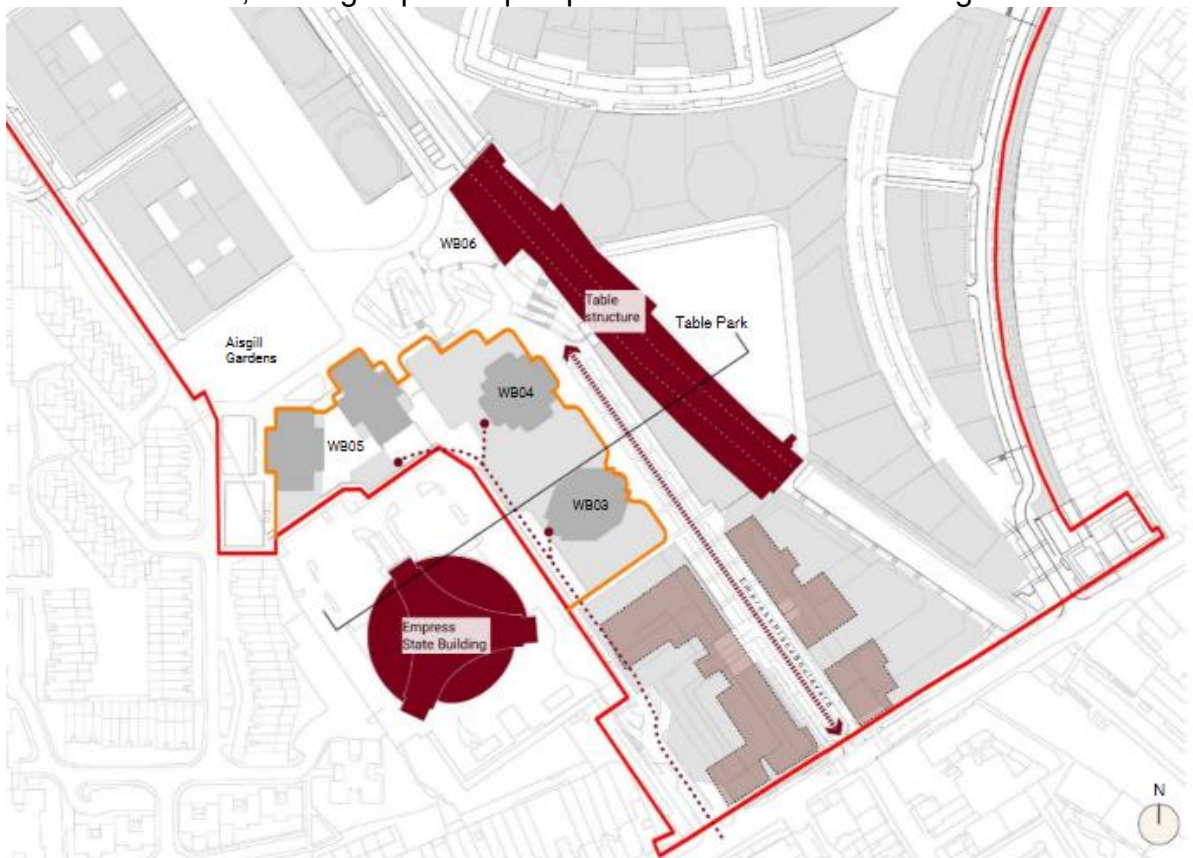
- 12.45 The detailed component of the Earl's Court masterplan comprises Plots WB03, WB04 and WB05 in LBHF (and Plots EC05 and EC06 in RBKC).
- WB03 - Purpose-built student accommodation block
 - WB04 - Residential tower
 - WB05 - Two residential blocks
- 12.46 Plots WB03 and WB04 are located within the Empress Place Character Area while WB05 is located within the adjoining Aisgill Gardens Character Area.
- 12.47 WB03 and WB04 are proposed, respectively, as student and residential uses in the form of two tall buildings that would be connected by a shared podium facing onto Empress Place. The podium would contain ancillary service, car parking and access functions at the rear, with retail frontages on Empress Place.
- 12.48 WB05 comprises two freestanding residential buildings (T1 and T2) that face onto Aisgill Gardens. Community uses are included at ground floor level. Ancillary service, access and car parking functions are shared with WB03 and WB04.



- 12.49 The detailed design proposals for Plots WB03, WB04 and WB05 have evolved over the course of extensive pre-application discussions and design reviews to respond to the architectural heritage of Earl's Court's former exhibition buildings. This has resulted in a contemporary reinterpretation of Art Deco style, as reflected in the approach to the overall form and massing of the proposed buildings as well as their architectural character and detailing.
- 12.50 Each building has a clear base, middle and top, with the two taller buildings given expressive, sculpted "crowns" appropriate to their prominence on the skyline. Curved corners and balconies would provide a consistent approach to architectural form across all three plots, with each having a distinct but complementary approach to façade composition and choices of facing materials and colour.

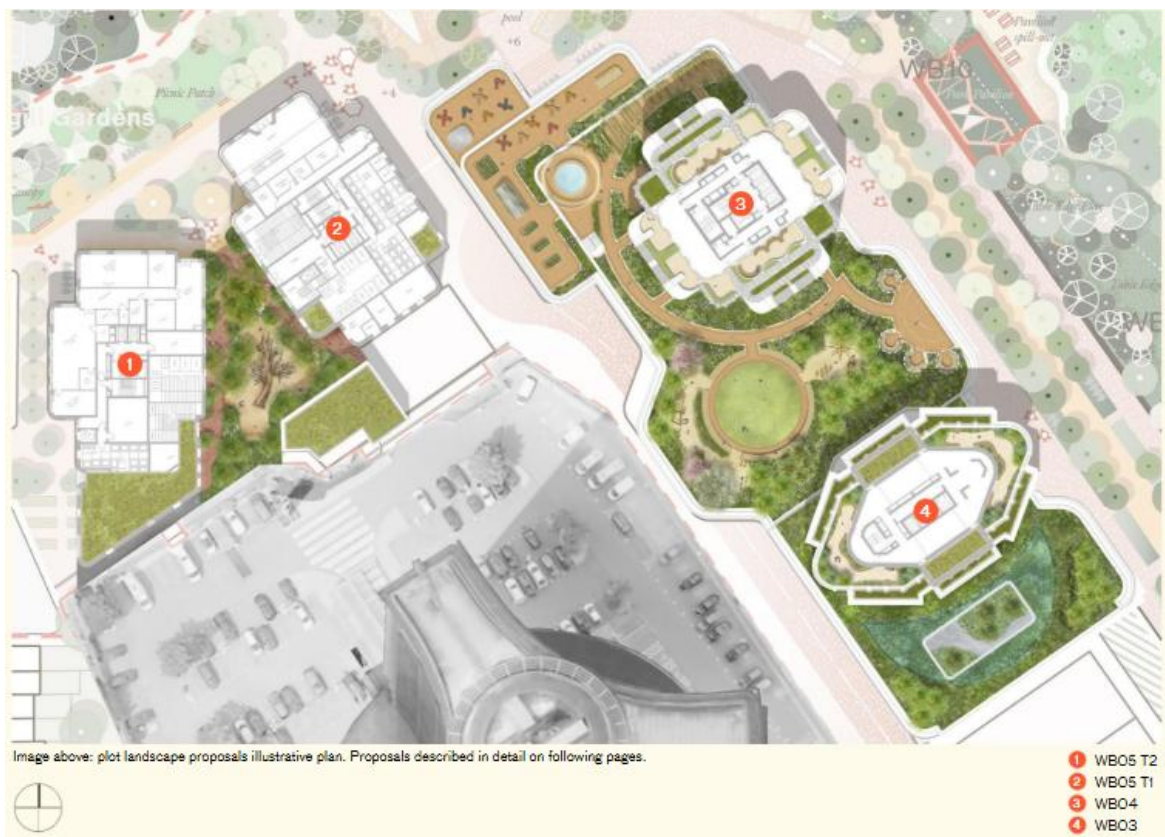
Plots WB03 and WB04 Urban Design

- 12.51 WB03, WB04 and WB05 are located to the western extent of the masterplan area and share a secure, solid boundary with the Empress State Building.
- 12.52 At lower levels, these plots serve to provide active frontages to Empress Place boulevard, the Cascades and Aisgill Gardens, through the provision of shared podium residential entrances, alongside commercial and community uses.
- 12.53 Servicing and deliveries to these plots will largely be focussed on the western extent of the site, limiting impacts upon pedestrian movement through the site.



Public realm and landscape

- 12.54 The landscaping and public realm to complement these plots is not included in detail at this stage and would form the focus of the first Reserved Matters Application (RMA) as part of the Phase 1 development programme.
- 12.55 However, as discussed above, officers consider that the design principles and intent for these spaces, when coupled with the detailed design of these plots, would deliver appropriate enclosure, activity and placemaking to ensure that the southern aspect of the site provides meaningful routes and spaces, regardless of whether the TfL depot land is developed in future.
- 12.56 Appropriate conditions relating to the phasing of development and submission of full details of the public realm, prior to commencement and subsequent occupation of these plots, is also recommended by officers to ensure that key public spaces are delivered alongside these tall buildings.
- 12.57 At podium level, WB03 and WB04 are linked by a shared podium, including a variety of hard/soft landscaped areas, terraces/lawns and green roof infrastructure. The student accommodation block would have outlook onto these spaces, but no access to them. The residential tower would benefit from access to terraces, natural play areas and a communal lawn. Towards the north, stepped layers of terraces provide additional outdoor spaces for the benefit of future residents of the residential tower, and a commercial food and beverage external terrace at lower level.



Scale and massing

- 12.58 WB03 and WB04 are proposed within the masterplan as part of the primary cluster of tall buildings, focused on the existing neighbouring tall building, the Empress Place Building. In LBHF this cluster would be completed by the outline plot WB06; and by plots EC05 and EC06 in RBKC.
- 12.59 WB04 is proposed as the tallest building in the masterplan, occupying a focal position, with WB03 a subordinate tall building that forms part of a stepping-down of building heights towards Lillie Road to the south.
- 12.60 WB03 is proposed to be 34 storeys tall overall, with WB04 rising to 42 storeys. Both buildings have faceted forms with a strong vertical emphasis and a clear expression of base, middle and top. The massing at the tops of these buildings is further articulated and tapered to create sculpted "crowns" that will create elegant silhouettes on the skyline and reaffirm their clustering with the Empress State Building.



Architectural character and appearance

- 12.61 As discussed above, WB03 and WB04 are built off a common podium that fronts on to the eastern edge of a new "boulevard" that will be an extension of Empress Place from Lillie Road and will form part of the key north-south route through the masterplan. WB03 and WB04 are connected directly to the ground where their entrance lobbies are expressed as prominent double-height, glazed elements that break up and provide visual relief in what would otherwise be a continuous retail/commercial frontage.
- 12.62 The podium is a landscaped area providing communal amenity and play spaces for use by residents of WB04, with denser landscape around WB03 providing visual amenity and privacy to its student rooms.
- 12.63 The internal layout of a typical floor in WB03 is characterised by groups of small student bedrooms arranged about a central core of lifts, staircases and service shafts, tapering towards shared kitchens and lounges at each end of the plan. The natural regularity and repetition of these student rooms is expressed in the overall approach to the architectural treatment of this block, with the development introducing a strong grid to inform the façade detailing of precast concrete columns and beams that frame metal-framed windows and louvred side panels.
- 12.64 Visual contrast is provided by the larger scaled and faceted windows of the shared kitchens and lounges set in a curved, darker coloured concrete framework at the ends of the tapered floor plan. These elements are further expressed at lower levels at the base of the building and celebrated as part of the crown. Overall, the facades are broken down into distinct elements that combine to give the building an elegant and layered vertical composition, with a stepped and tapered crown of polished concrete panels.



12.65 As the tallest building occupying the site, WB04 has a "petal" shaped cruciform plan that is balanced rather than being orientated in one direction or another. Its many corners are curved and alternate between open balconies and enclosed rooms. The façade is composed of smooth precast concrete columns and ribbed concrete beams, with generous metal-framed windows and balcony railings. The massing of the building tapers towards the top to reveal a translucent crown of glass and bundles of highly polished metal rods that extend to the ground on inner corners to create an impression of a water cascading down the building. A double height, glazed series of gardens at the crown of the building provides communal amenity space for residents as well as being a crystal-like beacon that will be visible on the skyline from all directions.



12.66 Within more localised views of the scheme, the façade treatment seeks to emulate the appearance of a waterfall, with elevations flowing down to the ground, and drawing in the expression of the base of the building. This would also complement the approach to the adjacent cascades delivered within the wider landscaping features for phase 1.



12.67 For these plots, full details including typical bay/condition studies have been provided in support of the application in the form of plans, elevations, sections and 3D-studies to provide fuller details of the design going beyond what would normally be provided at this stage. Additional conditions in relation to materials are suggested within the recommendation of this report, to allow further scrutiny of these details prior to commencement of development.

Plot WB05 **Urban design**

Access, layout and routes

12.68 WB05 forms the southern edge of what will become Aisgill Gardens and part of the primary east-west route through the masterplan. Its western boundary is shared with the West Kensington and Gibbs Green estates. It is proposed that the existing boundary wall between the estates and the site would be opened up to allow greater permeability through a new pedestrian and cycle connection between Aisgill Avenue and Aisgill Gardens.



12.69 This approach could also facilitate the delivery of re-providing a full-size MUGA and a new freestanding community building as part of the latter elements of Phase 1 of the development.

Public realm and landscape

12.70 The residential development of WB05 would benefit from a central, at-grade communal space, incorporating play spaces for the benefit of future residents.

12.71 As part of the future RMA submission for Phase 1 this area would be supplemented by the additional public amenity areas of Aisgill Gardens and as described above, the potential redesigned multi-use games area to the west of the site, and the potential new community hall.

Scale and massing

12.72 WB05 comprises two separate freestanding buildings at 17 storeys and 9 storeys (plus roof level plant) that step down in height from WB04 towards the boundary with the West Kensington and Gibbs Green estates on Aisgill Avenue. The built form of these buildings is more low-key than its taller neighbours with simpler, sculpted forms that are nonetheless clearly expressed as having a base, middle and top.



Architectural character and appearance

- 12.73 The two residential blocks forming plot WB05 are physically separated from the WB03, WB04 podium by the retained long vehicle access road that serves the Lillie Bridge Depot. Despite this separation it is designed as an integral part of the group of Phase 1 detailed plots and makes a transition towards the neighbouring estates in terms of building height and a less formal connection between ground floor uses and the public realm.
- 12.74 These blocks have plan forms that are like WB04, being cruciform in shape with curved corners occupied by balconies. This gives the buildings a similar character to the student block (WB04), albeit of a significantly smaller scale. Both are clad in brickwork with metal framed windows and balcony enclosures but are differentiated by the detailed treatment of the brick piers and spandrels. This gives the taller block (T1) a vertical emphasis that complements its height, and the smaller block (T2) a horizontal emphasis that is appropriate to its oblong proportions.



12.75 For this plot, full details, including typical bay/condition studies, have been provided in support of the application in the form of plans, elevations, sections and 3D-studies to provide fuller details of the design beyond what would normally be provided at this stage. Additional conditions in relation to materials are suggested within the recommendation of this report, to allow further scrutiny of these details prior to commencement of development.

12.76 Generally, officers are supportive of the high-quality design and architecture of the detailed plots within Phase 1 of the development which would bring forward tall buildings of a varying scale. These tall buildings would complement and complete a cluster of development framing and reaffirming the legibility and wayfinding function of the site as currently provided by the Empress State building. The details supporting the application convey the high-quality and robust design of these buildings, which will be highly prominent elements from surrounding views of the Earls Court development.

Tall building assessment

12.77 Local Plan Policy DC3 (Tall Buildings) states that tall buildings which are significantly higher than the general prevailing height of the surrounding townscape and which have an unacceptably disruptive and harmful impact on the skyline will be resisted by the Council. The policy also highlights several areas within which development of tall buildings would be appropriate.

- 12.78 The application site is situated in the Earl's Court and West Kensington Opportunity Area, an area within which tall/large buildings are appropriate in principle.
- 12.79 London Plan Policy D9 (Tall Buildings) is split into three elements. Part A provides a London-wide definition of a tall building. Part B highlights the need for boroughs to take a plan-led approach to the development of tall buildings within Local Plans. Part C provides an impact framework to assess proposals for tall buildings. The policy definition of a tall building is a building which is 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 12.80 The majority of the buildings proposed across the Earls Court masterplan would qualify as a tall building under this definition. As such, both the detailed plots presented in Phase 1 and the overall masterplan require assessment against the impact frameworks of both Local Plan Policy DC3 and London Plan Policy D9.
- 12.81 This section of the report assesses the cumulative impact of the entire masterplan, including both the detailed and outline components of the hybrid planning application, by reference to the frameworks set out in London Plan Policy D9 and Local Plan Policy DC3. This assessment considers the maximum parameters of all plots being delivered on-site.

London Plan Policy D9 (Tall Buildings)

- 12.82 The following provides a detailed assessment of the application against the impact assessment framework of Part C of the policy:

1) visual impacts

a) the views of buildings from different distances:

- *long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views*
- *mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality*
- *immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*

12.83 Views of the proposed development have been provided within the Built Heritage, Townscape Visual Impact Assessment, (BHTIVA) chapter of the Environmental Statement submitted in support of the planning application. These are discussed in further detail in the Heritage and Townscape section of this report.

12.84 In terms of the outline components of the scheme, their impacts will largely be relative to local townscape and mid-range/localised views. The elements of the development within Empress Place/Lille Road and facing onto the A4, West Cromwell Road, will be highly prominent along views from these arterial east-west routes. In the case of the tall building cluster to the north of the site, this will have additional visibility from surrounding Victorian terraces.

12.85 For the Phase 1 detailed plots, given their scale, these developments will be far more visible from localised, mid-range and long-range views of the site. Given that full details of these plots are provided within the application, officers can comment upon the high quality of the design and detailing of these plots, particularly the highly visible upper parts and crowns of WB03 and WB04 which have been sensitively designed to create articulated profiles on the skyline. The two buildings in plot WB05 step down in height from the middle of the site towards the low-rise buildings in the neighbouring estates.

12.86 These plots serve to reinforce and consolidate a tall building cluster around the existing Empress State building, providing a positive and legible marker to the Earls Court development, aiding wayfinding to the network of public spaces which will be provided on-site.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan

12.87 The outline proposals have taken due account of these policy requirements, with the Design Code providing relevant guidance to inform the future detailing of these plots.

12.88 In terms of the Phase 1 detailed designs, the tallest buildings proposed are based upon a robust approach to architecture and detailing which give the tall building cluster integrity and completeness when viewed as a cluster, and when considered against the backdrop of the existing Empress State building.

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

12.89 The outline and detailed proposals have taken due account of this policy requirement and are assessed in the Heritage and Townscape section of this report.

12.90 The scale of detailed plots WB03, WB04 and WB05 in relation to each other, to the Empress State Building and to the neighbouring streets and estates have been considered in the creation of a coherent spatial strategy. The architectural quality and materials are considered to be of an exemplary standard and durability.

12.91 Notwithstanding this, it is acknowledged that the scheme would result in some harm to the setting and significance of adjacent heritage assets and this harm is considered alongside the heritage merits and other public benefits of the scheme, in the concluding sections of this report.

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

12.92 The proposal site is not within the setting of a World Heritage Site.

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river

12.93 The location of the proposed development means it would not have any adverse impact on the open quality of the river and the riverside public realm, and it would not contribute to a canyon effect along the river. However, it is noted that due to the scale of some tall buildings proposed, some buildings would be highly visible in key views from the riverside. Within these views the proposals would follow a similar format to other existing tall buildings, occupying and being visible as background features within these views, and offering legibility and wayfinding to the Earls Court site. However, positive foreground and mid-range features within these views would remain prominent. As such, the impacts upon these views are considered to be acceptable.

g) buildings should not cause adverse reflected glare

h) buildings should be designed to minimise light pollution from internal and external lighting

12.94 The outline proposals have taken due account of these policy requirements. The Design Code provides relevant guidance that will be a material consideration, to be secured via appropriate planning conditions, when assessing future RMAs.

12.95 The facing materials for the Phase 1 detail proposals have been selected to avoid glare, and the lighting scheme has been designed to minimise light pollution. As such, lighting design would help to aid wayfinding and legibility of the Earls Court development during the evening and nighttime hours.

2) functional impact

a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants

12.96 This aspect of the outline component would be dealt with when assessing future RMAs and would be subject to relevant building regulations and other legislation applicable at the time.

12.97 The detailed proposals are supported by an appropriate fire design report that shows how the buildings have been designed with the safety of occupants in mind. An appropriately worded condition will secure the safety of all occupants through the detailed design, construction and occupation phases of development.

b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process

c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas

12.98 At this stage, these matters are generally addressed in the Transport Assessment that has been submitted in support of the outline and detailed components of the hybrid planning application, and which is considered elsewhere in this report. The Design Code provides additional guidance that will be a material consideration, to be secured via appropriate planning conditions, when assessing future RMAs.

12.99 An appropriately worded condition will secure the quality and safety of access and servicing arrangements for the detailed component through the detailed design and occupation phases of development. This will be particularly relevant to any of the outline plots which seek to introduce community, cultural, or leisure uses as part of future RMA submissions.

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building

e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area

f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings

12.100 These matters are addressed in the Transport and Environmental Statement that have been submitted in support of the outline and detailed components of the planning application, and which are considered elsewhere in this report.

3) environmental impact

a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions

c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building

12.101 These matters are addressed in the Environmental Assessment that has been submitted in support of the outline and detailed components of the planning application, and which is considered elsewhere in this report. The Design Code provides additional guidance that will be a material consideration, to be secured via appropriate planning conditions, when assessing future RMAs.

4) cumulative impacts

a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

12.102 The cumulative visual, functional and environmental impacts of the proposed development have been addressed in the relevant chapters of the Environmental Assessment that has been submitted in support of this hybrid planning application.

12.103 The design of the detailed component integrates environmental mitigation measures, and it is not anticipated that retro-fitting will be required.

Public access

D Free to enter publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where

they should normally be located at the top of the building to afford wider views across London.

12.104 For the outline plots, this matter would be dealt with during consideration of any subsequent RMAs and could be secured via an appropriately worded condition.

12.105 The proposed residential uses for WB03, WB04 and WB05 mean that it is not considered viable, owing to fire safety management implications, and building cores and management arrangements, to facilitate public access to their upper floors. However, for the other outline plots, which are envisaged to introduce community, cultural, or leisure uses, the provision of both internal and external publicly accessible areas will be reviewed when detailed plot designs are brought forward.

Local Plan Policy DC3

12.1 Policy DC3 sets out a separate framework of impact assessment criteria which should be met by a proposed scheme. The following provides a detailed assessment of the application against that framework:

Impact assessment

a. has a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form

b. is of the highest quality of architectural design and materials with an appropriate form and silhouette which contributes positively to the built heritage and image of the borough

c. has an acceptable impact on the skyline, and views from and to open spaces, the riverside and waterways and other locally important views and prospects

d. has had full regard to the significance of heritage assets including the setting of, and views to and from, such assets, has no unacceptable harmful impacts, and should comply with Historic England guidance on tall buildings

12.106 The outline and detailed proposals have taken account of these requirements and are assessed in the Design, Heritage and Townscape section of this report. The Design Code provide relevant design guidance for the outline component that will be a material consideration, to be secured via appropriate planning conditions, when assessing future RMAs.

12.107 For the detailed plots comprising the tallest elements of the proposed development, as mentioned above the submission includes additional details relating to typical elevation treatment, bay studies and architectural detailing which allow for officers to conclude that the first phase would deliver a high quality of architecture and design.

12.108 Impacts upon the surrounding townscape are considered acceptable in this regard, as the detailed plots would form a cluster of tall buildings, seeking

to reaffirm and complement the role of the existing Empress State building. These tall buildings would also serve as landmarks or marker buildings to aid wayfinding and legibility for residents and visitors to the site; promoting access to the significant new high quality public spaces, and destinations at the new Earls Court.

- 12.109 Notwithstanding this outcome, it is acknowledged that the scheme would result in some harm to the setting and significance of adjacent heritage assets and this harm is considered alongside the heritage merits, and public benefits of the scheme in the concluding sections of this report; with due regard to the NPPF and relevant provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

e. is supported by appropriate transport infrastructure

- 12.110 This matter is addressed in the Transport Assessment that has been submitted in support of the outline and detailed components of the planning application, and which is considered elsewhere in this report.

- 12.111 Notwithstanding this, the Design Code provides additional guidance for the outline component that will be a material consideration, to be secured via appropriate planning conditions, when assessing future RMA submissions.

f. has an appropriate design at the base of the tall building and provides ground floor activity

g. interacts positively to the public realm and contributes to the permeability of the area

- 12.112 For the outline plots, the Parameter Plans and Design Code provide relevant design guidance that will be a material consideration, to be secured via appropriate planning conditions, when assessing future RMAs. These elements seek to ensure that future plots provide meaningful levels of active frontages to new and upgraded areas of public realm, including new spaces, routes and connections.

- 12.113 The design of detailed plots WB03, WB04 and WB05, incorporating the tallest buildings as part of the new development, particularly through the shared podium space, is considered to provide a mix of appropriate ground floor activities including residential entrances and commercial spaces which interact positively with the public realm.

- 12.114 Together both the detailed and outline elements of the scheme would contribute to the permeability of the area, providing additional pedestrian and cycle permeability as a core concept of the development. This includes opening-up key east-west connections between existing residential/commercial areas to the west to Earls Court and West Brompton stations and, should the TfL depot land come forward for development, a new north-south boulevard linking West Kensington station to the site.

h. is of a sustainable design and construction, including minimising energy use and the risk of overheating through passive design measures, and the design allows for adaptation of the space

i. does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements

j. respects the principles of accessible and inclusive design

- 12.115 These matters are addressed in the Environmental Assessment that has been submitted in support of the outline and detailed components of the planning application, and which is considered elsewhere in this report. The Design Code provides additional guidance that will be a material consideration, to be secured via appropriate planning conditions, when assessing future RMAs.

Tall Building conclusion

- 12.116 Considering the development of a tall building at this location, the principle of development is supported by both London Plan Policy D9 and Local Plan Policy DC3.

- 12.117 Proposals include provision of two key clusters of tall buildings, one focussed to the south of the site to complete and complement the existing Empress State Building and the other to the north of the site, addressing the A4 and West Cromwell Road.

- 12.117.1 Although the proposed buildings are considered to represent a step-change in surrounding townscape views; the cluster of tall buildings would also serve as landmarks or marker buildings to aid wayfinding and legibility for residents and visitors to the site. This would promote access to the significant new high quality public spaces and other destinations at the new Earls Court.

- 12.118 As such, given the presence of the existing Empress State building, the current proposals overall are not considered to have an unacceptable disruptive or harmful impact on the skyline for the purposes of Policy DC3. It is acknowledged that the scheme would result in some impacts upon the setting and significance of adjacent heritage assets.

- 12.119 Given the opportunity area status of the site and the presence of tall buildings in the local area, alongside the high-quality of design and architecture of the proposals, the new public spaces and uses which will activate the site will comply with the impact frameworks set out in Local Plan (2018) Policy DC3 and London Plan (2021) Policy D9.

- 12.120 Furthermore, the scheme on the whole is considered to provide a positive addition to the skyline and the townscape of the borough and would comply with both Local Plan (2018 Policy DC3 and London Plan (2021) Policy D9.

Heritage and Townscape

- 12.121 The Planning (Listed Buildings and Conservation areas) Act 1990 sets out the principal statutory duties which must be considered in the determination of any application affecting listed buildings or conservation areas.
- 12.122 It is key to the assessment of these applications that the decision-making process is based on the understanding of specific duties in relation to listed buildings and conservation areas required by the relevant legislation, specifically the duties in sections 66 and 72 of the Planning (Listed Buildings and Conservation areas) Act 1990, and the requirements set out in the NPPF.
- 12.123 Section 72 of the Planning (Listed Buildings and Conservation areas) Act 1990 requires that in the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2) (which includes the planning Acts), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 12.124 Paragraph 202 of the NPPF states: “Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. [...]”
- 12.125 Paragraph 208 of the NPPF states: “Local Planning Authorities should identify and assess the significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”
- 12.126 Paragraph 210 of the NPPF states: “In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.”
- 12.127 Paragraph 212 of the NPPF states: “When considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of

whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

- 12.128 Paragraph 213 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
- 12.129 Paragraph 214 of the NPPF states: “[W]here a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 12.130 Paragraph 215 of the NPPF states: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”
- 12.131 Paragraph 216 of the NPPF states: “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”
- 12.132 The NPPF makes a clear distinction between the approach to be taken in decision-making where the proposed development would affect the significance of designated heritage assets (listed buildings, conservation areas, Registered Parks and Gardens) and where it would affect the significance of non-designated heritage assets (buildings of local historic and architectural importance).
- 12.133 The NPPF also makes a clear distinction between the approach to be taken in decision-making where the Proposed Development would result in ‘substantial’ harm and where it would result in ‘less than substantial’ harm.
- 12.134 Case law indicates that following the approach set out in the NPPF will normally be enough to satisfy the statutory tests. However, when carrying out the balancing exercise in paragraph 208, it is important to recognise that the

statutory provisions require the decision maker to give great weight to the desirability of preserving designated heritage assets and/or their setting.

12.135 The Planning Practice Guidance notes which accompany the NPPF remind us that it is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed.

12.136 The north-western portion of the site is situated in the Barons Court conservation area, and a small element to the south-east is situated in the Philbeach conservation area (located in RBKC). The site does not include any other formally designated/non-designated heritage assets although there are some historic buildings of note which are to be retained as outlined below. As such, the proposal scheme would impact directly and indirectly on heritage assets, largely through impacts upon the setting of adjacent heritage assets. These impacts are considered separately in the following sections.

Assessment methodology

12.137 As part of the application and environmental statement submissions, the applicant has submitted a Built Heritage, Townscape, and Visual Impact Assessment, (BHTVIA) which, in summary, concludes that there would be less than substantial harm ranging from very low to medium harm to the setting of 17 designated assets within both boroughs: 5 in LBHF and 12 in RBKC as shown in the Heritage Tables 1 - 4 below.

12.138 To fully assess the proposal scheme, officers have agreed the scope of supporting documents with the applicant. These documents, submitted with the application, identify the impact on the significance (through changes to their setting) of designated/non-designated heritage assets within a study area of up to 3km surrounding the application site, predominantly covering assets within both LBHF and the RBKC area. However, given the scale of this radius, assets within other neighbouring boroughs were also considered through this process.

12.139 The affected heritage assets were identified using theoretical Zone of Visual Influence (ZVI) modelling and a desk-based study, including testing of massing models. Due to the high number of heritage receptors within the study boundary, only those shown to have intervisibility with the development, or likely to be impacted through changes to their setting, were scoped into the assessment. This amounted to 51 heritage assets in LBHF and 42 in RBKC. The BHTIVA then assessed whether the proposed development would impact on the significance of those heritage assets (through changes to their setting) and, if so, to what degree.

12.140 In planning policy terms, in the first instance, the assessment to be made is whether the development within the setting of a designated heritage asset will cause harm to that designated heritage asset or its setting. If no harm is caused, there is no need to undertake a balancing exercise. If harm would be caused, it is necessary to assess the magnitude of that harm before going to apply the balancing test as set out in paragraphs 214 and 215 of the NPPF as appropriate.

12.141 Local Plan Policy DC8 (Heritage and Conservation) states that “The council will conserve the significance of the borough’s historic environment by protecting, restoring, and enhancing its heritage assets. These assets include listed buildings, conservation areas, historic parks and gardens, the scheduled monument of Fulham Palace Moated site, unscheduled archaeological remains and buildings and features of local interest. “When determining applications affecting heritage assets, the Council will apply the following principles:

a. the presumption will be in favour of the conservation, restoration and enhancement of heritage assets, and proposals should secure the long-term future of heritage assets. The more significant the designated heritage asset, the greater the presumption should be in favour of its conservation;

b. applications affecting designated heritage assets, including alterations and extensions to buildings will only be permitted if the significance of the heritage asset is conserved or enhanced;

c. applications should conserve the setting of, make a positive contribution to, or reveal the significance of the heritage asset. The presence of heritage assets should inform high-quality design within their setting;

d. applications affecting non-designated heritage assets (buildings and artefacts of local importance and interest) will be determined having regard to the scale and impact of any harm or loss and the significance of the heritage asset in accordance with paragraph 209 of the National Planning Policy Framework;

e. particular regard will be given to matters of scale, height, massing, alignment, materials and use;

f. where changes of use are proposed for heritage assets, the proposed use, and any alterations that are required resulting from the proposed use should be consistent with the aims of conservation of the asset’s significance, including securing its optimum viable use;

g. applications should include a description of the significance of the asset concerned and an assessment of the impact of the proposal upon it or its setting which should be carried out with the assistance of a suitably qualified person. The extent of the requirement should be proportionate to the nature and level of the asset’s significance. Where archaeological remains of national significance may be affected applications should also be supported by an archaeological field evaluation;

h. proposals which involve substantial harm, or less than substantial harm to the significance of a heritage asset will be refused unless it can be demonstrated that they meet the criteria specified in paragraph 207 and 208 of the National Planning Policy Framework;

i. where a heritage asset cannot be retained in its entirety or when a change of use is proposed, the developer should ensure that a suitably qualified person carries out an analysis (including photographic surveys) of its design and significance, in order to record and advance the understanding of heritage in the borough. The extent of the requirement should be proportionate to the nature and level of the asset's significance;

j. the proposal respects the principles of accessible and inclusive design;

k. where measures to mitigate the effects of climate change are proposed, the applicants will be required to demonstrate how they have considered the significance of the heritage asset and tailored their proposals accordingly;

l. expert advice will be required to address the need to evaluate and conserve archaeological remains, and to advise on the appropriate mitigation measures in cases where excavation is justified; and

m. securing the future of heritage assets at risk identified on Historic England's national register, as part of a positive strategy for the historic environment".

- 12.142 The Council's Supplementary Planning Guidance SPD is relevant, in particular Key Principles AH1 (Information Requirements for applications for consent affecting heritage assets); AH2 (Protection of Heritage Assets); CAG1 (Land Use in Conservation areas); CAG2 (Urban Design in Conservation areas) and CAG3 (New Development in Conservation areas). These Key Principles provide guidance which seeks to ensure that heritage assets are conserved in a manner appropriate to their significance in accordance with the NPPF.

Application site – Heritage constraints

- 12.143 As mentioned above, a small section of the north-western boundary of the site is located within the Baron's Court conservation area and this constitutes the only designated heritage asset within the LBHF part of the application site boundary.

- 12.144 Grade II listed Earls Court Station and a small stretch of the Philbeach conservation area fall within the site on the RBKC section of the development.

- 12.145 Historic buildings within the site comprise the Victorian Train maintenance shed to the north of the site within Lillie Road depot, 9 Beaumont Avenue (linked 1870s and 1960s former metalworks and laundry) and the 19th Century terraced residential buildings of Empress Place. Whilst not included on the Council's local list, 'Buildings of Merit', following the NPPF test, the applicant's heritage consultant considers that these assets would benefit from consideration as non-designated heritage assets within the boundary site, following the guidance of the NPPF and national planning guidance.

Barons Court conservation area

- 12.146 The Barons Court conservation area is a large conservation area divided into 3 sub-areas to identify areas of similar character. A small part of Sub-area C on the junction of North End Road and West Cromwell Road/ Talgarth Road is contained within the site. This section comprises the units at 175-177 North End Road, and a small area of scrubland north of the railway line fronting West Cromwell Road.
- 12.147 The stretch of buildings comprising 175-177 North End Road is adjacent to single-storey West Kensington Station which was designed in the 1930s in the style of esteemed London Transport architect Charles Holden and is a locally listed Building of Merit. The buildings sit to the south of the station and incorporate a parade of shops with a two-storey red brick building with shops at ground floor flanking the corner. The shops and corner building have been much modified over time, with modern windows, render and, apart from 175a, crude and poorly proportioned shopfronts.
- 12.148 The public realm around West Kensington Station, which includes a narrow pavement, cafe tables and chairs, a bin and a bus stop directly outside the station, make for a cramped and uncomfortable pedestrian experience, especially for those with additional accessibility requirements.

Assessment of harm

- 12.149 The overall approach of the masterplan would result in change to this sub-area of the conservation area, mainly because of the demolition of 175-177b North End Road to provide a new public square and the potential for a new southern access to West Kensington Station adjacent to this space. Officers consider that these buildings proposed to be demolished make a very limited contribution to this section of the conservation area and have been the subject of significant modification and alterations.
- 12.150 As such, the existing buildings are not considered to contribute positively to the character or significance of the Barons Court conservation area. Furthermore, the provision of a new public square in this location is considered to be a clear heritage benefit of the development, opening up views of the locally listed Buildings of Merit consisting of West Kensington Station and the Famous 3 Kings Public House and improving the public realm around the station. As such the demolition of the existing buildings is considered acceptable and would not result in any harm to the character or significance of the conservation area.
- 12.151 The visibility of new commercial and residential buildings of an increased scale in views out of the conservation area, looking east as shown in TVA view 46, would result in some harm. However, the limited scope of increased impact across the wider conservation area, coupled with the presence of the existing Ashfield House in this viewpoint, means the harm to the setting of the conservation area is towards a low level of less than substantial harm. Officers consider that this harm could potentially be mitigated by the future detailed

design of the new development plots which would be subject to approval through future RMA submissions.

- 12.152 Harm to the groups of statutory listed monuments in Margravine Cemetery and the wider setting of the cemetery have been considered as part of the assessment. As there is limited intervisibility between the cemetery and the development and as the monuments' setting comprises their immediate context and is not experienced as part of the wider conservation area, there would no harm caused to their setting.

Non-designated heritage assets

- 12.153 Considering the non-designated heritage assets occupying the application site, officers note that the maintenance shed and the buildings comprising 9 Beaumont Avenue are much altered and contained within the site and whilst of some architectural and historic value, are of less significance than the buildings on Empress Place. Whilst there have been some modifications to these terraces, the grain, materials and architectural character of the buildings form a cohesive piece of 19th Century townscape and form a distinct and pleasing entrance to the site from Lillie Road.

- 12.154 The masterplan prioritises the retention of existing buildings or façades except where technical design development demonstrates that this is not possible. This approach is welcomed on visual and sustainability grounds. The retention of the buildings would be a heritage benefit as the buildings serve as indicators of the former functions and use of the site, helping to enable the historical evolution of the application site and wider area to remain legible. This is particularly important bearing in mind the previous demolition of the Convention Centres. However, in the instance that the retention of the existing buildings or façades is not technically possible, these heritage benefits would not be delivered. Further detail of these plots would be reviewed at RMA application stage.

Adjacent Heritage Assets – for which their setting would be impacted by the development

- 12.155 As discussed above, given the scale of the proposed development, officers have worked with the developer team to review the extent of impact upon the setting and significance of adjacent heritage assets.
- 12.156 This assessment is based upon the full implementation of the entire development, as presented in the masterplan, and is made based upon the maximum parameters of development included within the application for both the detailed and outline elements of the scheme. Following this review, the following assets have been identified as requiring assessment of the degree of harm to their setting.

Heritage Table 1: Assets in London Borough of Hammersmith and Fulham		
Asset	Type	Short description
62-68 Lillie Road	Grade II	Early-mid C19 th painted stucco houses.
St. Andrews Church	Grade II	Victorian Parish Church with late C19 th and early C20 th additions.
Church of St. Alban	Grade II	Red brick church, 1894-6
Sir. Oswald Stoll Foundation (Southern block, gates, piers, walls and railings)	Grade II	1917-23, housing for former servicemen in revived English Baroque style.
Stamford Brook House	Grade II	C18 th brown brick house and garden wall
The Brook	Grade II	2 cottages reconstructed to form one house in 18 th Century.
9 and 11 Stamford Brook Road	Grade II listed	Mid-C19 th cottages
15 Stamford Brook Road	Grade II listed	Mid-C19 th cottage
17 and 19 Stamford Brook Road	Grade II listed	Mid-C19 th cottages
21 and 23 Stamford Brook Road	Grade II listed	Mid C19 th cottages
Administration Block to Queen Charlotte's Maternity Hospital	Grade II listed	Elaborate neo-Gothic stucco former house, 1878.
Hammersmith Bridge	Grade II* listed	Suspension bridge 1884 by Bazalgette
6-9 Lower Mall	Grade II listed	C18 th - early C19 th houses, listed separately.
10 Lower Mall (Kent House) inc. railings and gate	Grade II listed	Mid-Georgian suburban house with original railings
11 and 12 Lower Mall	Grade II listed	Early C17 th houses
Parish Church of All Saints	Grade II* listed	C14 th -19 th Parish Church, squared rubblestone with ashlar dressings
Fulham Palace	Grade I listed	Principal residence of Bishop of London from C12 th until 1973.
Bishops Park RPG	Grade II	Public Park developed from land adjoining medieval Fulham Palace
Fulham Palace RPG	Grade II	Gardens and grounds of C16 th origin.
Olympia and Avonmore CA	Conservation Area	Large area characterised by speculative C19 residential development and urban

		morphology created by Exhibition Halls.
Gunter Estate CA	Conservation Area	Predominantly C19 speculative residential development by the Gunter family.
Turneville/Chesson CA	Conservation Area	Small area of speculative Victorian residential development.
Sedlescombe Road CA	Conservation Area	Predominantly C19 speculative residential development
Queens Club Gardens CA	Conservation Area	Historic sports club and surrounding C19-mid C20 development
Crabtree CA	Conservation Area	Area of Victorian residential terraces with rectilinear street pattern
Parsons Green CA	Conservation Area	Parsons Green and Eel Brook Common and surrounding residential development.
The Mall CA	Conservation Area	Narrow area of historic buildings dating from mid-C17 and their relationship with the river.
Bishops Park CA	Conservation Area	Open spaces of Bishops Park, grounds of Fulham Palace, the river and surrounding Victorian development
8 Avonmore Road	Locally listed BOM	Speculative Victorian residential building
20 Avonmore Road	Locally listed BOM	Speculative Victorian residential building
Avonmore Gardens	Locally listed BOM	Red brick mansion block, late C19
Kensington Village	Locally listed BOM	Late C19, part of speculative building project.
Baron's Court House	Locally listed BOM	Victorian speculative residential building
2 and 23 Baron's Court Road	Locally listed BOM	Victorian speculative residential building
5 Barton Road	Locally listed BOM	Victorian speculative residential building
2, 6, 13 Castletown Road	Locally listed BOM	Victorian speculative residential building
1 Challoner Crescent	Locally listed BOM	Victorian speculative residential building
1 Challoner Street	Locally listed BOM	Victorian speculative residential building

Institute of Indian Culture	Locally listed BOM	Stock brick with blue-toned mosaic detailing, modern frontage, incorporates former congregational church c.1885.
Heritage Table 2: Assets in Royal Borough of Kensington and Chelsea		
Asset	Type	Short description
Brompton Cemetery (RPG)	Grade I	Mid-C19 public cemetery
Brompton Cemetery (CA)	Conservation Area	Elaborate cemetery (one of the C19 Magnificent Seven) with symmetrical plan divided into orthogonal elements
Entrance gates and screen on Old Brompton Road (Brompton Cemetery)	Grade II*	Triumphal arch entrance to Brompton Cemetery 1839-40
Arcade forming north-west quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Round arched rusticated stone arcade c.1839-40
Arcade forming north-east quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Round arched rusticated stone arcade c.1839-40
Arcade forming south-west quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Round arched rusticated stone arcade c.1839-40
Arcade forming south-east quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Round arched rusticated stone arcade c.1839-40
Church of England Chapel (Brompton Cemetery)	Grade II*	Octagonal Chapel 1839-40 stone with lead dome.
Church of St Cuthbert and St Matthias	Grade I	Parish Church with rich embellishments 1884-7
St Cuthbert's Clergy House	Grade II	Red brick clergy house with stone dressings 1883
Philbeach Conservation Area	Conservation Area	Victorian residential development on crescent-shaped street pattern
Earls Court Station	Grade II listed	Underground station 1906-37, buff glazed faience with green trimmings
Nevern Square Conservation Area	Conservation Area	Predominantly residential group of roads dating to late C19

Earls Court Square Conservation Area	Conservation Area	Grid of roads with Victorian residential terraces, mansion blocks and semi-detached houses
Earls Court Village Conservation Area	Conservation Area	Contained area of early C19- early C20 terraces
Courtfield Conservation Area	Conservation Area	Late C19 houses with irregular facades and earlier Italianate villas
Heritage Table 3: Other Assets in neighbouring boroughs		
Asset	Type	Short description
Putney Embankment Riverside	Conservation Area within LB Wandsworth	Special character derived from its riverside location, boathouses, former wharf and some of oldest remaining buildings in Putney.
Battersea Park	Conservation Area within LCB Wandsworth	Special character derives from formal relationship between park, urban development surrounding it and the River Thames to the north
Barnes Quadrant	Listed buildings on the riverside between Barnes and Fulham	Grade II* listed Hammersmith Bridge and 6-12 Lower Mall scoped into the assessment due to visibility indicated by the ZTV.
St Marys Cemetery	Conservation Area	Conservation area consisting of Alma Place and St Marys Roman Catholic Cemetery and crossing borough boundaries of LBHF into Kensal Green Cemetery situated in RBKC.

Assessment of harm methodology

12.157 Aside from the applicant's BHTVIA, consideration has been given to relevant provisions within the Town & Country Planning Act 1990, the NPPF and the London Plan (particularly Policies HC1 and D9, in which tall buildings are required to avoid harm to the significance of London's heritage assets and their settings, and to provide clear and convincing justification for any harm including public benefits that outweigh that harm).

12.158 Officers have also considered Local Plan Policies and guidance documents including the following: Greater London Authority Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets; The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (Historic England, 2017, 2nd Edition); and Tall Buildings: Historic England Advice Note 4 (Historic England, 2022).

Conservation areas within LHBF

Olympia and Avonmore conservation area

- 12.159 There would be an impact on the Olympia and Avonmore conservation area which was designated in 1988 and extended in 1991 and 2002. The conservation area covers a large area, and its significance mainly relates to the presence of the Olympia campus, Avonmore trading estate, and the residential areas creating the context between these spaces.
- 12.160 This conservation area has been subject of change most recently, owing to the ongoing redevelopment of Olympia. The detailed plots of the scheme and the taller developments of WB03, WB04, WB05 and WB06 would have limited impact upon the views of this conservation area.
- 12.161 The main element of harm to the setting of the conservation area would arise in views along Morning Crescent looking South. There would be a significant increase in the scale and massing of development in this view however it is noted that the visual impact would be mitigated by the design approach of the first phase of development, including a visual break between WB03 and WB05. The latter development plots may result in additional harm to these views. However, future RMA submissions may be capable of reducing the level of harm through detailed consideration of massing, architecture, and materiality, particularly upon the views from Mornington Avenue. For this reason, the harm to the Olympia and Avonmore Conservation Area is considered to be at the low-medium end of the scale of less than substantial harm.

Gunter Estate conservation area

- 12.162 The Gunter Estate conservation area is defined by speculative Victorian housing and has a strong architectural uniformity. There would be some visibility of plots WB03, WB04 and WB05 in views looking south, however the impact would be mitigated by the separation distances between these plots.
- 12.163 The BHTVIA identifies some harm looking east along West Cromwell Road, however it is considered that this would also be mitigated by the high quality of design of the phase 1 development. The latter development plots may result in additional harm to these views. However, future RMA submissions may be capable of reducing the level of harm through detailed consideration of massing, architecture, and materiality, particularly upon the views this key arterial route. As such, the harm to the setting of this conservation area, is therefore considered to be at the low end of less than substantial harm.

Queens Club Gardens conservation area

- 12.164 The Queens Club Gardens conservation area is defined by the historic Queens Club sports complex and the development of the surrounding estate, including grounds, sports facilities and mansion blocks. There would be harm to the setting of the Queens Club Gardens conservation area through the introduction of new buildings visible in views east, particularly from Queens

Club Gardens itself and the private residents' garden (TVA view 50). It is noted however that the roofline of the buildings in this view is not untouched and modern development (notably the Empress State Building) is already visible. The harm caused to the setting of the conservation area is therefore considered to be at the low end of less than substantial.

The Mall conservation area

- 12.165 The Mall conservation area has been scoped out of the assessment. Due to its position and its character being predominantly derived from the river and historic development along its edge, views from the conservation area would not be adversely affected, particularly as the background of these views already contain modern developments of a more substantive scale including the Arc, Charing Cross Hospital and the Empress State Building, all of a more significant scale than the prevailing context. The proposed cluster of primary tall buildings would reaffirm the scale of these background features.

Statutory Listed Buildings

- 12.166 Following careful review of the BHTVIA, officers conclude that the Grade II* All Saints Parish Church is the only statutory listed building in LBHF that would have harm caused to its setting by the development through a coalescence with the church tower in views of the church tower from Putney Bridge. However, in line with the guidance set out in section 5.9 of Tall Buildings: Historic England Advice Note 4 (Historic England, 2022), the views submitted in the TVA incorporate kinetic accurate visual representations which indicate how moving across the bridge would serve to change the visibility of the development. The coalescence with the tower would only be perceivable at certain locations when moving across the bridge and the impact is therefore considered to sit at the low end of less than substantial harm.

Other heritage assets impacted by the proposals – London Borough of Hammersmith and Fulham

- 12.167 Paragraph 216 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 12.168 In addition to the non-designated heritage assets within the site discussed above, there are several locally listed Buildings of Merit scoped into the assessment as shown in Tables 1 and 4. It is considered that these buildings would be impacted by glimpsed visibility of the new development. However, bearing in mind the existing skyline context and the distance from the host buildings, the harm to the setting of these buildings is considered to be on the very low end of less than substantial. Each asset and its contribution towards local heritage significance, would remain clearly legible.

Assets within Royal Borough of Kensington and Chelsea

12.169 The height of the new development, particularly in the case of the tall buildings proposed as part of the detailed element of the proposals, would result in a potential impact on heritage assets located in the adjoining borough of Royal Borough of Kensington and Chelsea. Assets affected by the development have been scoped into and assessed in the BHTVA and their analysis has been considered in detail by officers at LBHF. There is some discrepancy regarding the degree of harm to some of the identified assets and a summary table of the conclusions of the applicant and officers at London Borough of Hammersmith and Fulham is shown below.

12.170 In the case of Philbeach Conservation Area, a small part of which sits in the south eastern corner of the site, it is noted that there is an extant permission for a part 4, part 9 storey building development under PP/21/00272 on the corner of Old Brompton Road and Eardley Crescent which, due to its approved increase in scale directly opposite the entrance gates to Brompton Cemetery, needs to be taken into consideration in the assessment of harm.

12.171 Whilst the exact degree of harm identified in relation to some assets differs to some degree, it should be noted that we agree with the conclusions of the BHTVA overall, i.e. that the impact on setting in all cases would be less than substantial. For the purposes of making a balanced planning assessment, officers are in agreement with the conclusions of the BHTVA that harm does not extend beyond less than substantial harm and therefore the relevant policy test will be paragraph 215 of the NPPF.

Summary of Heritage Harm

12.172 The table below summarises those non-designed heritage assets for which harm has been identified either to their significance or setting, alongside officer assessment of the overall scale of harm caused to the asset.

12.173 It is important to note that where no harm has been identified, the asset is not listed in this summary.

Heritage Table 4 Degree of harm/benefit to assets within London Borough of Hammersmith and Fulham

Asset	Designation	Degree of harm/benefit (LBHF Officer assessment)
Parish Church of All Saints	Grade II*	Low level of less than substantial harm. As mentioned above, the tallest building would coalesce with the Church tower in selected views. However, this harm would be mitigated by the kinetic nature of views of the Church from Putney Bridge.

Olympia and Avonmore CA	Conservation area	Low-medium level of less than substantial harm. The Phase 1 development would result in highly prominent additions in views from the conservation area. However, future RMA submissions may be capable of reducing the level of harm through detailed consideration of massing, architecture, and materiality, particularly upon the views from Mornington Avenue,
Gunter Estate CA	Conservation area	Low level of less than substantial harm The Phase 1 development would result in highly prominent additions in views from the conservation area. However, future RMA submissions may be capable of reducing the level of harm through detailed consideration of massing, architecture, and materiality, particularly upon the views from West Cromwell Road.
Barons Court CA	Conservation area	Low level of less than substantial harm. Buildings proposed for demolition are deemed not to make a positive contribution to the character and appearance of conservation area. Based upon the submitted Parameter Plans, there would be some increased scale introduced within the background of views, and therefore the setting of this conservation area. However the impacts are limited to views looking east, Also note existence of Ashford House in existing views and potential mitigation afforded through future RMA submissions to mitigate harm through the detailed design and massing of proposals.
Queens Club Gardens CA	Conservation area	Low level of less than substantial harm. Some harm to views east from private gardens and Queens Club itself but note existing skyline has already been breached by taller development, notably Empress State building.

8 Avonmore Road	Locally listed BOM	Very Low level of harm
20 Avonmore Road	Locally listed BOM	Very Low level of harm
Avonmore Gardens	Locally listed BOM	Very Low level of harm
Kensington Village	Locally listed BOM	Very Low level of harm
Baron's Court House	Locally listed BOM	Very Low level of harm
2 Baron's Court Road	Locally listed BOM	Very Low level of harm
23 Baron's Court Road	Locally listed BOM	Very Low level of harm
5 Barton Road	Locally listed BOM	Very Low level of harm
13 Castletown Road	Locally listed BOM	Very Low level of harm
2 Castletown Road	Locally listed BOM	Very Low level of harm
6 Castletown Road	Locally listed BOM	Very Low level of harm
1 Challoner Crescent	Locally listed BOM	Very Low level of harm
1 Calloner Street	Locally listed BOM	Very Low level of harm
Institute of Indian Culture	Locally listed BOM	Very Low level of harm

Heritage Table 5: Degree of harm/benefit to assets within Royal Brough of Kensington and Chelsea

Heritage Asset/Receptor	Designation	Degree of Harm/Benefit (LBHF Officer Assessment)
Brompton Cemetery (RPG)	Grade I RPG	Medium-High (less than substantial harm). Cumulative impact on character from increase in massing visibility and urbanising impact - particularly note setting impact from views north.
Brompton Cemetery (CA)	Conservation area	Medium-High (less than substantial harm). Cumulative impact on character from increase in massing visibility and urbanising impact - particularly note setting impact from views north.
Entrance gates and screen on Old Brompton Road (Brompton Cemetery)	Grade II*	None - new development not appreciated in views north or south across the cemetery or from Old Brompton Road

Arcade forming north-west quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Medium-High (less than substantial harm). Increased urbanisation and visibility of tall buildings with greatest impact on symmetry and appreciation of arcades and chapel forming north-west quarter.
Arcade forming north-east quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Medium-Low (less than substantial harm). Increased urbanisation and visibility of tall buildings impact on symmetry and appreciation of arcades and chapel.
Arcade forming south-west quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Medium-Low (less than substantial harm). Increased urbanisation and visibility of tall buildings impact on symmetry and appreciation of arcades and chapel
Arcade forming south-east quarter of Circle and Avenue (Brompton Cemetery)	Grade II*	Medium-Low (less than substantial harm). Increased urbanisation and visibility of tall buildings impact on symmetry and appreciation of arcades and chapel.
Church of England Chapel (Brompton Cemetery)	Grade II*	Low (less than substantial harm). Some impact from appreciation of arcades and chapel as a planned composition with setting marginally impacted by increased urbanisation impacts.
Church of St Cuthbert and St Matthias	Grade I	Medium (less than substantial harm). Increased scale introduces new element to streetscene and competes with spire as dominant architectural element in street.
St Cuthbert's Clergy House	Grade II	Medium (less than substantial harm). Coalescence of outline plots WK04/5/6 behind building in TVA view A15.
Philbeach Conservation Area	CA	Medium-High (less than substantial harm). Proposals would result in taller and bulkier elements being introduced into the relatively uniform late Victorian character of the conservation area.
Earls Court Station	Grade II	Very Low (less than substantial harm). Some impact on setting through increase in scale but mitigated by previous development on site to retain harm at very low level.
Nevern Square Conservation Area	Conservation area	Medium (less than substantial harm).

		Areas of coalescence shown within BHTVIA contrast with uniform character of terraces within CA.
Earls Court Square Conservation Area	Conservation area	Medium (less than substantial). Increase in scale and bulk impacts appreciation of uniform character of terraces.
Earls Court Village Conservation Area	Conservation area	Low (less than substantial harm). Introduction of taller and more modern architecture into historic streetscape will have impact but this is confined to the termination of views along Hogarth Road and Kenway Road.
Courtfield Conservation Area	Conservation area	Medium (less than substantial harm). Impact on setting caused by increased height and massing creating backdrop to relatively uniform late Victorian streetscape.
Cheyne Conservation Area	Conservation area- additional heritage receptor scoped into 2025 ES addendum	Very Low (less than substantial harm) Impact on setting through visibility of taller development reduced due to presence of established modern development already visible in backdrop.
1-8, and 9-18, 11A and 18 A Collingham Gardens	Grade II*- additional heritage receptor scoped into 2025 ES addendum	Low (less than substantial harm) Impact on setting through some visibility of larger scaled buildings in backdrop of views reducing cohesive appearance of smaller scaled Victorian townscape.
Royal Hospital Conservation Area	Conservation Area- additional heritage receptor scoped into 2025 ES addendum	Very Low (less than substantial harm) Impact on setting through visibility of taller development reduced due to presence of established modern development already visible in backdrop of key views from this conservation area.

Historic England Response

- 12.174 Historic England have provided a detailed analysis of the scheme which focuses mainly on the impact on designated heritage assets in RBKC although it does refer to impacts on Olympia and Avonmore Conservation Area, particularly the increase in scale as seen in Mornington Ave (View 41) and Queens Club Gardens Conservation Area, specifically the impact on the skyline- they consider the development breaks a consistent roofline and draws the eye from views of the listed church of St. Andrew.

- 12.175 They do not give a specific assessment of harm for the above assets but conclude that there would be less than substantial harm overall due to the scale and wide-reaching nature of harm, which will therefore need clear and convincing justification as set out in the NPPF.

Townscape

- 12.176 As discussed in the section above, the BHTVIA supporting the application includes zone of theoretical visibility modelling which has informed the approach to scoping and assessing harm to heritage assets. The outcome of this assessment has also assisted officers in undertaking an assessment of the scheme relative to the tall building impact frameworks of London Plan Policy D9 and Local Plan Policy DC3, particularly focussed upon the impact of the proposals upon townscape views.

Long-range views

- 12.176.1 When considering long-range views, the primary cluster of tall buildings would be focused on the existing Empress State Building, and would increase the visibility of the site when considered against the baseline position. In many views the upper proportion of the tallest residential tower (WB04) would exceed the height of the current crown of the Empress State Building, and therefore would become highly prominent in a range of borough-wide views, alongside views from adjacent boroughs, particularly views from RBKC and other riverfront views, or views from significant open spaces typically within boroughs to the south and west of the application site.

- 12.177 Within these views, the cluster of buildings would function in a similar manner to the existing Empress State Building and other taller buildings viewed within this context, generally functioning as background features within these views. Given the high-quality of design and architecture of the cluster of tall buildings, this change, although significant and would impact upon several highly sensitive receptors, is generally not considered to be harmful in townscape terms. In many instances the changes are considered to be neutral or beneficial overall, assisting in wayfinding and legibility towards the Earls Court development. The scheme would create a new destination, focussed on the range on new residential, commercial, community/cultural uses, and new and significant areas of public space the development would provide for future residents and visitors.

Mid-range/localised views

- 12.178 A similar conclusion is reached considering mid-range and localised views of the site, particularly along the river corridor and within key open spaces. Within these views an increased proportion of the existing Empress State Building is already a visible background feature, and the proposals would serve to complement this existing situation through provision of new high-quality, well designed tall buildings.

- 12.179 The secondary tall building cluster to the northern extent of the site, although presented in outline form, would introduce taller buildings of a less significant scale to those in the primary cluster. However, it is noted that these buildings would result in significant changes to local townscape and views along the A4, West Cromwell Road, and adjacent terraced streets in both LBHF and RBKC. In many of these views the existing Ashfield House development is already a prominent feature of views, and due to its limited quality of architecture serves to dominate as a background feature of these views. Through the demolition of the building and replacement with a series of taller buildings, it is envisaged that the development could result in some beneficial changes to these views.
- 12.180 However, the provision of high-quality buildings, and their detailed design and architecture will be fundamental to achieving this outcome. Given that these elements would be managed through future RMA submissions, there is further opportunity to resolve these matters at a later stage.
- 12.181 Again, like the impact upon long-range views, the general impacts of the scheme upon mid-range and immediate views of the site are considered beneficial overall to reaffirm the status of Earls Court and provide increased wayfinding and legibility to mark the site as a new destination. The only exception to this is the impact of the development on localised views in RBKC, linked to the cluster of conservation areas due east of the site as referenced in the heritage section above. In these views, the scale of change would be significant and result in the introduction of several tall buildings, which would adversely affect the tight-knit Victorian character of these areas.
- 12.182 Notwithstanding the impacts upon the setting of adjacent heritage assets considered above, and localised adverse impacts upon the cluster of Victorian character and scale of developments to the east of the site, within RBKC, the proposals are acceptable in townscape and visual impact terms and proposals are not considered to result in an unacceptably disruptive and harmful impact on the skyline of the borough.

Design Review

- 12.183 As discussed in the consultation section above, the proposals have been subject of multiple design reviews, including presentation to the LBHF Design Review Panel (DRP), RBKC Quality Review Panel (QRP), and the GLAs London Review Panel (LRP). In addition, the emerging proposals were presented to Historic England's London Advisory Committee (LAC).
- 12.184 Proposals have been presented to each panel at an early stage of the pre-application engagement, and the design evolution of the scheme has sought to respond to their comments.
- 12.185 The masterplan and landscaping approach of the scheme has been amended substantively to reflect the comments of the panels, feedback by officers and other feedback during non-statutory public consultation.

- 12.186 There have been substantive changes to the quantum of development provided by the masterplan and a rationalisation of number and scale of tall buildings across the masterplan area, and particularly within the primary tall building cluster focussed on the environment around the existing Empress State Building.
- 12.187 In addition the landscape masterplan for the site, has been updated to provide additional provision of formal public space across the site, focussed mainly on enlargement of the table park and key improvements to routes and connections across the site, to form additional permeable connections to the west by pedestrians to the retained estates of West Kensington, Gibbs Green and North End Road beyond. This approach has also led to revisions to public spaces, including enhancement to Aisgill Gardens and the introduction of the West Kensington Station Square.
- 12.188 Furthermore, the design of detailed plots, consisting of the primary tall building cluster in LBHF has also been revised to reflect panel commentary, and advice by provided by officers. The outcome of the design evolution for these plots has generally related to the refinement and improvement of the quality of these buildings, both in terms of their internal composition and external architectural quality. With the panel commenting positively upon the tallest buildings now provide positive markers to the Earls Court development.
- 12.189 Additional revisions were recommended by individual panels, to both detailed phases/plots which will be subject of further review as part of future reserved matters, (RMA) applications or conditions relative to the detailed phases.

Inclusive Design Review Panel

- 12.190 The LBHF Inclusive Design Review Panel have reviewed the proposals four times throughout the pre-application process. The panel have provided commentary upon the key elements of the masterplan, landscaping details, and design of detailed plot design.
- 12.191 Like the comments above, the overall design of the proposals have been revised and evolved to take these comments into consideration. The following is a summary of commentary from these sessions:
- 12.192 Overall approach - Ensure inclusive design should be a golden thread in all decisions on construction, materials, landscaping details, minor alterations to layout or form of the development between planning and completion. Making sure that consideration is given to key principles of design for the mind guidance.
- 12.193 Phasing and delivery – The phasing of the development and what this means in terms of timing and extent of accessible public realm through permanent and intermediate as-built conditions and potential site hoardings. The panel recommended that the development should be designed to be

accessible and inclusive from the first day of occupation and public access to key spaces.

- 12.194 Landscaping and connections – the panel were supportive of the provision of ramped access and lift provision of ensure that inclusive access to the table park from Aisgill Gardens and Empress Place was achieved from delivery of Phase 1.
- 12.195 Individual plots design, focussed on the detailed plots – ensuring that level access is provided, that communal facilities considered adaptability and inclusive access by a wide range of users from the outset. Ensuring that residential proposals provide appropriate level of accessible and adaptable accommodation, including provision and access to blue badge parking.
- 12.196 Overall officers consider that the design of the masterplan and detailed phases have responded positively to the comments of individual design review and inclusive design review panels. In terms of future phases of development, including detailed landscape design and outline development plots, there are further opportunities for review as part of either pre-application or application stage discussions on future reserved matters, (RMA) submissions.

Design, Heritage, and Townscape Conclusion

- 12.197 The proposal scheme represents an opportunity to deliver the regeneration of the Earls Court site, which forms part of the Earls Court and West Kensington Opportunity Area, (also part of the wider Fulham Regeneration Area), in accordance with the London Plan and the Council's Local Plan policies.
- 12.198 The masterplan approach to the redevelopment of the wider site, encompassing land in RKBC too, offers a unique opportunity to reconnect and improve permeability, connectivity and legibility of the site as a new destination in West London.
- 12.199 Proposals would optimise the opportunity of the site, bringing forward a mix of new housing, commercial, and community/cultural uses, alongside new and significant areas of public space. The detailed Phase 1 development would deliver a cluster of high-quality tall buildings which would provide landmarks/marker buildings to aid wayfinding and legibility for future residents and visitors to the site.
- 12.200 The detail included in the Parameter Plans, Design Code and supporting information relating to the outline elements of the scheme, also provides adequate comfort that the latter phases of development would be capable of achieving a high quality of design and placemaking, which would be managed through subsequent reserved matters applications. This would include provision of a secondary tall building cluster to the north of the site, adjacent to the A4, West Cromwell Road, again providing enhanced legibility and wayfinding to the Earls Court development along this key arterial route to central London.

- 12.201 Overall, the proposals would seek to improve connections within the local area, including connecting the Gibbs Green and West Kensington estates to new public spaces and offering increased permeability to Earls Court and West Kensington Stations. Existing and future residents would benefit from access to the network of new public spaces provided by the scheme.

Tall building impact

- 12.202 Having undertaken an assessment of the scheme against the tall building frameworks of London Plan Policy D9 and Local Plan Policy DC3, officers conclude that the design of the scheme, (particularly the Phase 1 development), would represent a scheme of the highest-quality design and architecture to aid wayfinding to the Earls Court site and strengthen its legibility. Whilst the development would result in significant changes to townscape views/receptors, these changes are considered neutral to beneficial overall, (notwithstanding the localised adverse impact upon the cluster of Victorian developments to the east of the site, within RBKC), and would not have an unacceptably disruptive and harmful impact upon the skyline.

Heritage impact

- 12.203 As discussed in Tables 4 and 5 of this report above, proposals would result in some harm to the settings of both designated and non-designated heritage assets. These harms have been found in all instances to be less than substantial in degree, including in relation to the settings of the Olympia and Avonmore, Gunter Estate, Barons Court, and Queens Club Gardens conservation areas, the setting of Grade II* Parish Church of All Saints in LBHF; and the setting of the cluster of designated heritage assets in Brompton Cemetery, the Church of St Cuthert and St Matthias, conservation areas including Philbeach, Earls Court station/square/village, and Nevern Square in RBKC. Considerable importance and weight must be given in the planning balance to these findings of harms to the settings of heritage assets, even if these harms are considered to be less than substantial.

- 12.204 Officers are satisfied that the overall character and significance of the settings of all these heritage assets would be preserved either entirely or substantially, notwithstanding these harms. In the case of assets within RBKC, although the settings of these assets would be subject to change and the proposals would introduce features which would distract from and visually compete with existing assets, the assets themselves would clearly remain capable of being appreciated for their individual character and significance, as would their substantially preserved settings.

Heritage benefits arising from the proposals

- 12.205 There are several heritage benefits arising from the proposals:
- Bringing vacant land back into long-term use, replacing temporary hoardings and improving the outlook and character of the local

streetscene within both the Barons Court and Philbeach conservation areas.

- Improving the character and setting of the Barons Court conservation area, and the West Kensington station (locally listed Building of Merit), through demolition of the existing buildings and provision of a new public square.
- Retention and reuse of non-designated assets including the Victorian maintenance shed and terraces on Empress Place.

12.206 These benefits would only be achieved in their entirety if the TfL depot land is brought forward for redevelopment, otherwise these benefits would not be delivered.

Urban Design and Heritage Balance

12.207 The application site is located within the Earls Court and West Kensington Opportunity Area, part of the wider Fulham Regeneration Area, in accordance with the London Plan and Council's Local Plan policies.

12.208 As such, the application site is also in an area identified as suitable for the development of a tall building by Local Plan policy DC3 and London Plan Policy D9.

12.209 Following careful consideration, officers conclude that the proposed development would not result in any unacceptably disruptive and harmful impact on the skyline and would therefore comply with the impact frameworks of both policies.

12.210 Furthermore, the masterplan approach to the redevelopment of the wider site, encompassing land in RKBC too, offers a unique opportunity to reconnect and improve permeability, connectivity and legality of the site, whilst also optimising the development potential of the site.

12.211 Due to the scale of the development, the proposal would result in harms to the settings of several heritage assets within the London Borough of Hammersmith & Fulham and the adjoining Royal Borough of Kensington and Chelsea. In all instances these harms are considered to fall within the range of less than substantial harm. Considerable importance and weight must be given in the planning balance to these harms to the settings of heritage assets, even if these harms are considered to be less than substantial. Nevertheless, officers are satisfied that the overall character and significance of the settings of all these heritage assets would be preserved either entirely or substantially, notwithstanding these harms.

12.212 The degree of impact on assets in both boroughs has therefore been reviewed and assessed by both the applicant and both boroughs. The development would have some intervisibility in localised townscape views.

However, the impact upon these views would be within the range of minor adverse/neutral to beneficial overall.

- 12.213 The configuration, design and materiality of the proposed development is thought to be well considered and would provide a high-quality development which would enhance the appearance of the local area, reinforcing the legibility and identity of the Earls Court site in the wider locality.
- 12.214 As listed above there are some heritage benefits arising from the proposals, however these benefits in their own right would not outweigh the less than substantial harms to the settings of adjacent heritage assets identified by officers and considering the necessary NPPF tests. These benefits would be reduced further in the event that it is not possible to retain the buildings within Empress Place, and if the TfL depot land is not brought forward for redevelopment with the attendant benefits to the Baron's Court conservation area. Further discussion of the public benefits of the scheme are referenced in in the conclusion of this report.
- 12.215 Taking these wider benefits into consideration, officers consider that for the reasons summarised in the concluding sections of this report, it is appropriate to grant planning permission, having had special regard to the desirability of preserving the settings of relevant listed buildings (section 66, Planning (Listed Buildings and Conservation Areas) Act 1990), and having paid special attention to the desirability of preserving or enhancing the character or appearance of relevant conservation areas (section 72, the 1990 Act).
- 12.216 The proposal is also in line with national guidance in the NPPF and strategic local policies on urban design and high-quality development. In summary, it is considered that by optimising the use of the site to provide a development of this scale it is possible to provide the number of significant important benefits outlined above. Although some elements of conflict with policy have been identified above, overall, the Proposed Development is considered acceptable having regard to the NPPF, Policies D3, D4, D6, D8, D9 and HC1 of the London Plan (2021) and Policies DC1, DC2, DC3, DC7 and DC8 of the Local Plan (2018).

13 ECOLOGY (including Urban Greening and Townscape)

- 13.1 NPPF Section 8 emphasises the importance of healthy and safe communities (including play spaces), Section 12 emphasises the importance of achieving well-designed places and the contribution of trees and Section 15 emphasises the importance of conserving and enhancing the natural and local environment.
- 13.2 London Plan Policy D6 (Housing quality and standards) requires developments to consider the provision of public, communal and open spaces. Policy G5 (Urban Greening) states that major development should contribute to the greening of London, incorporating measures such as high-quality landscaping, green roads, green walls and nature-based sustainable drainage. Policy S4 (Play and informal recreation) further requires the provision of good quality, well-designed and stimulating play and informal recreation provision for

children, including trees and greenery where possible. NPPF. Para. 135 states that planning decisions should ensure that developments would function well and add to the overall quality of the area and are visually attractive as a result of appropriate and effective landscaping as well as good architecture and layout.

- 13.3 Local Plan Policy OS1 (Parks and Open Spaces) states that the Council would protect, enhance, and increase the provision of parks, open space and biodiversity in the borough. Policy OS3 (Play space for Children and Young People) states that proposals should not result in the loss of existing play space or an increased deficiency in the availability of such play space. It requires well-designed provision of accessible, inclusive, safe and secure communal play space in new residential developments to cater to the needs of all children. The scale and nature of its provision should be proportionate to the scale and nature of the Proposed Development. Policy OS5 (Greening the Borough) seeks to enhance biodiversity and green infrastructure in the borough by (inter alia) maximising the provision of gardens, garden space and soft landscaping, and seeking green and brown roofs and planting as part of new development; seeking retention of existing trees and provision of new trees on development sites; and adding to the greening of streets and the public realm.

Landscaping

- 13.4 The illustrative masterplan proposes seven dedicated character areas in the 'all phases' scenario:
1. West Brompton – a lively tree lined crescent
 2. Warkwick Crescent – a quiet residential quarter
 3. The Table – the green heart of Earls Court Exhibition Gardens
 4. Empress Place – a focus on innovation and creation
 5. Aisgill Gardens – the community green
 6. Lillie Sidings – a focus on culture and heritage
 7. West Kensington – the innovation cluster
- 13.5 The landscaping strategy across these character areas seeks to increase access into and throughout the proposed site with multifunctional social, economic and environmental sustainability underpinning the design. The landscape proposals can be divided by the following components:
- a) Biodiversity and planting – planting characters inform the design of specific areas across the site, introducing seasonality, climate resilience and increasing habitat provision.
 - b) Trees, soil and microclimate – a soil strategy is necessary to ensure adequate soil depth for maximum tree planting above structural features such as 'the table'. Similarly, a microclimate strategy that utilises trees helps reduce air pollution and increase wind breaks and thermal comfort.

c) Roofs – Roofs are maximised to either provide green space to achieve Urban Greening Factor or to provide publicly accessible terraces that provide elevated views of the surrounding area.

d) Water – Sustainable Urban Drainage Systems are maximised across the site in ways that support play space, biodiversity and aesthetics.

e) Play – a play strategy intends to ensure playable spaces, dedicated play spaces and safe routes between them are provided across the site.

f) Street furniture and art – Furniture designed for diverse needs, both in terms of accessibility and use, will be introduced across the site. Artwork will be woven into the site and reinforce a sense of place.

g) Lighting – a lighting strategy will be produced to meet the varying demands of the site while reducing any unnecessary pollution.

13.6 The potential impact of the development has been considered on the existing trees. The majority of the existing trees are located adjacent to the boundaries of the site. The proposal would not involve the removal of any of the existing Category 'A' trees. And removal of 24 Category B, C and U trees on the LBD part of the site. Similarly, the proposal involves the removal of Category B, C and U trees on the Early Phases (ECLP) land which extends across the two boroughs.

13.7 BS 5837 recommends that a detailed methodology is agreed upon in the form of an Arboricultural Method Statement ('AMS'), which would ensure that trees are well protected during the demolition and construction stage. An AMS would be secured by means of a condition to avoid or minimise the impacts on the Root Protection Areas (RPAs) and canopies of the existing trees to be retained. The AMS would detail all tree protection measures and limitations on construction activity.

13.8 The proposed development would delivery over 1,000 with 723 trees within the Early Phases (and approximately 268 trees in LBHF). Conditions relating to soft landscaping, tree protection would be secured together with a legal obligation regarding a Landscape Management Plan.

Biodiversity

13.9 Paragraph 193 of the NPPF requires planning decisions to minimise impacts on and provide net gains for biodiversity when taking planning decisions. In addition, in England, under Section 40 of the Natural Environmental and Rural Communities Act 2006, all public bodies are required to have regard to biodiversity conservation when carrying out their functions.

13.10 London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively, and that development proposals should aim to secure Biodiversity Net Gain (BNG).

- 13.11 London Plan Policy G6, Part A, states that Sites of Importance for Nature Conservation (SINCs) should be protected. Part C states where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts: (1) avoid damaging the significant ecological features of the site; (2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site, and; (3) deliver off-site compensation of better biodiversity value.
- 13.12 Local Plan Policy OS4 states that designated nature conservation areas will be protected from development likely to cause demonstrable harm to their ecological value unless: (a) the Proposed Development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic regeneration objectives of the Local Plan, and measures are included for the protection and enhancement of any substantive nature conservation interest that the site may have so that there is no net loss of native species and no net loss of habitat; or (b) provision is made for replacement nature conservation interest of equal or greater value elsewhere in the locality.

Sites of Importance for Nature Conservation

- 13.13 A Preliminary Ecological Appraisal (PEA) has been submitted in support of the application which confirms that there are no statutory sites within the site boundary or within 2km of the site but confirms that there are two Borough Grade I Sites of Importance for Nature Conservation.
- 13.14 The West London Line South of Earl's Court spans 2.44 hectares and is located at the southern portion of the site. This site is significant to biodiversity due to its lack of disturbance and variety of habitat including developing woodland, grassland and tall herbaceous communities. It is a valuable wildlife corridor for both frequent commuter species such as bats and birds, and for the potential dispersal of others such as hedgehogs.
- 13.15 The West London Line in Brompton spans 3.42 hectares and is split into two sub-sections of the site. It notably contains an extensive area of neutral grassland which includes the species common toadflax (*Linaria vulgaris*) which may indicate the substrate is of low nutrients which would make the site particularly important for more diverse flora, in turn supporting more wildlife.
- 13.16 Due to the uncertainty of the development scenarios, the impacts on these sites are unclear, however the proposed development is likely to result in adverse removal and / or disturbance. One such scenario could see the 'decking over' of one SINC, which must be appropriately designed and managed with the new site providing enough valuable habitat that it provides a higher ecological value than the removed site. Key to this would be the inclusion of inaccessible areas, as well as appropriate native species planting. The PEA recommends that a Construction Environmental Management Plan (CEMP) is produced to include measures to prevent pollution impacting these sites. It also recommends several retention and mitigation measures.

- 13.17 Mitigation measures include briefing site workers on the identification and potential presence of protected species including lizards and ground nesting birds. Areas of bare ground, rubble and logs as well as bat and bird bricks and boxes should also be included. Demolition and vegetation removal should occur outside bird nesting season, and lighting should be designed to minimize the impact on nocturnal wildlife.
- 13.18 Where works impact the SINC sites, an Ecological Design Strategy will be prepared. This will include details of the ecological enhancements such as new native species planting including trees, areas inaccessible to people, log piles and more. The EDS will aim to mitigate impacts to the SINC site.

Protected species

- 13.19 A Preliminary Ecological Appraisal (PEA) has been submitted in support of the application which provides an assessment of the presence of notable habitats and species. Due to the transient essence of nature, ecological assessments such as the submitted PEA are valid for a maximum of two years but may need to be repeated sooner where site changes occur.
- 13.20 Limited bat activity was recorded in the PEA. No other protected species were recorded using the site, however potential for species including common lizard and black redstart to colonise the site before and during development was noted.
- 13.21 Red fox, an unprotected species, has been recorded actively using the site. While not protected, the Wild Mammals (Protection) Act 1996 makes it an offence to crush or asphyxiate any wild mammal with the intent to inflict unnecessary harm. It is therefore essential that this is monitored during site clearance and development, with reference to potential burrows hiding cubs.
- 13.22 In light of the above and in order to follow best practice, it is therefore essential for ecological surveys to be repeated on a regular basis throughout the development's lifetime, and any new findings to be addressed appropriately.

Biodiversity Net Gain

- 13.23 Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) introduced a mandatory 10% Biodiversity Net Gain (BNG) target for planning applications submitted from Monday 12th February 2024. As part of this policy, any significant onsite gains and all offsite gains must be secured by a legal agreement for 30 years.
- 13.24 Climate Change SPD KPC16 (Ecology, Biodiversity and Green Infrastructure) sets out the requirement to deliver 10% Biodiversity Net Gain and secure this for 30 years. Aligns with the London Plan Policy G5 recommended target UGF score of 0.4 in residential developments, and 0.3 in commercial developments.

- 13.25 To this end, an indicative Biodiversity Net Gain Assessment, along with a completed Biodiversity Metric Calculation has been submitted based on the above policy. The outline calculations are as follows:

All phases development scenario

Habitats: Baseline units: 15.61 BU, Post-development units: 31.07 BU, Net Gain: 98.97%

Hedgerows: Baseline units: 0.17 HU, Post-development units: 2.33 HU, Net Gain: 1270.01%

LBHF all phases development scenario

Habitats: Baseline units: 9.56 BU, Post-development units: 17.15 BU, Net Gain: 79.28%

Hedgerows: Baseline units: 0.17 HU, Post-development units: 1.36 HU, Net Gain: 699.00%

LBHF early phases development scenario

Habitats: Baseline units: 3.96 BU, Post-development units: 5.03 BU, Net Gain: 27.08%

Hedgerows: Baseline units: 0 HU, Post-development units: 0.45 HU, Net Gain: NA

- 13.26 The proposals include a multitude of habitats which would be considered significant and therefore must be legally secured and maintained at the proposed condition for 30 years from date of completion. These habitats include natural water features, green roofs, trees and neutral grassland.
- 13.27 Under any scenario, the proposed designs achieve above the minimum 10% BNG and therefore is in line with the policy requirements.

Urban Greening Factor

- 13.28 London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of development designs, calculated in the form of an Urban Greening Factor (UGF). An Urban Greening Factor of 0.3 is recommended for non-residential developments and 0.4 for residential developments.
- 13.29 Climate Change SPD KPC16 (Ecology, Biodiversity and Green Infrastructure) sets out the requirement to submit an assessment showing the UGF score. Higher standards are required for residential development. Aligns with the London Plan Policy G5 recommended target UGF score of 0.4 in residential developments, and 0.3 in commercial developments.
- 13.30 Under the proposed early phases design, the score achieved is exactly 0.4. Under the proposed all phases design, the score achieved is 0.4029. Both scenarios are therefore in line with the policies required score of 0.4.

Urban Greening and Biodiversity Conclusion

- 13.31 The proposal meets or exceeds London Plan Policies G1 Green infrastructure, G5 Urban greening G6 Biodiversity and access to nature. Obligations have been set to ensure best ecological practise, enhance biodiversity and deliver greening policies.
- 13.32 Obligations to ensure delivery of Biodiversity Net Gain commitment (a site wide commitment of 85%), including reconciliation on a phase-by-phase basis. Obligations to ensure delivery of Urban Greening Factor beyond the current baseline to >0.4 on a site-wide basis, including reconciliation on a phase-by-phase basis.

14 ACCESSBILTY & INCLUSIVITY / FIRE SAFETY / DESIGNING OUT CRIME & COMMUNITY SAFETY & SECURITY

Accessible and inclusive design

- 14.1 Accessible and inclusive design is covered by NPPF (paragraph 96 and 135), London Plan Policies D5 and D7, and Local Plan policies DC2 and HO6. The policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.
- 14.2 London Plan Policy D5 seeks to ensure developments achieve the highest standards of accessible inclusive design and developments should be informed by an inclusive design statement and detail engagement with relevant user groups. Policy DC2 of the Local Plan states that new build development must be designed to respect the principles of accessible and inclusive design.
- 14.3 London Plan Policy D7 (Accessible housing) and Local Plan Policy HO6 (Accessible housing) both require residential development to ensure that at least 10% of all units meet Building Regulation requirement M4(3) 'wheelchair user dwellings' i.e., designed from the outset to be wheelchair accessible, or easily adaptable for residents who are wheelchair users with the remaining 90% to be designed to M4(2) 'accessible and adaptable dwellings'.
- 14.4 An inclusive design statement has been included in the application submission (Design and Access Statement) which identifies design and mitigation measures which should be secured to achieve an inclusive environment.
- 14.5 The Applicant's development team have presented the proposals to the Council's Inclusive Design Panel on four occasions. Comments are summarised in Section 12 of the report. Four Public Realm Inclusivity Panel ('PRIP') sessions were held by the Applicant between September 2024 and June 2025. A wider stakeholder group was also formed involving a sub-group of PRIP members to discuss inclusive safety, culminating in the launch of the Inclusivity Safety Toolkit. Action on Disability (AoD), a user-led disabled

people's organisation based in the borough and working across West and Central London, have commented on the application. AoD welcome the opportunity for further involvement as the proposals develop through the reserved matter stages.

- 14.6 Access to and throughout the site is a key consideration of this masterplan. Inclusive design principles are embedded within the Control Documents and further detail will be required through the RMA process. Accessibility and permeability for the general population and vulnerable groups will need to ensure the ability for all to move about the site without barriers and safely. This would be feasible with the completion of an All-Phases development. A new north/south access from Lillie Road to North End Road and east/west access from Warwick Road (RBKC) to Aisgill Avenue and Beaumont Avenue (LBHF), spanning over the WLL, would be required to comply with TfL's Healthy Streets approach for pedestrians and cyclists. The proposed landscaping and play space are designed to address the existing site levels and constraints and be inclusive. An accessible route with drop kerbs would be integrated into the landscape as part of the inclusive approach. Accessibility would be assured using ramps, stairs and public lifts where the changes in level would be large.
- 14.7 Public terraces and external spaces would allow easy and step-free access for a range of people. Paths will need to be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Areas of rest at reasonable intervals (50m if feasible) are proposed to be provided and seating designed at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions. There would also be options for seating with backs and armrests for support when rising, as well as for a wheelchair user to transfer. The final details of hard and soft landscaping, including details on how the planting specification would be inclusive, will be secured by condition.
- 14.8 The proposed development seeks to prioritise sustainable forms of travel by active modes, through the provision of a pedestrian-priority public realm and a 'car lite' development. The development would create a fully accessible and inclusive environment, with step-free mobility across the site. The vehicle access strategy on-site would limit vehicular access to those trips that need to take place such as emergency vehicles, consolidating delivering and servicing journeys, and minimal car parking provision, including blue badge parking for those who need direct access (such as the mobility impaired).
- 14.9 A policy-compliant provision of accessible car parking spaces is proposed to be incorporated for all the land uses. Residential accessible parking designed to meet accessible standards would be provided on a plot-by-plot basis, equivalent to 3% of the unit numbers. Provision of accessible parking for other uses would be provided within the public realm. All the accessible parking spaces would have EV charging capabilities. Taxi set-down areas would be positioned at the edges of the site but also accessible to drop-off areas within 50m of all buildings if required, as recommended by the Inclusive Mobility Guidance. A zero-emissions car club is proposed. Car club spaces would be

distributed across the public realm and within proximity of buildings. Blue badge parking spaces and a Car and Cycle Management Plan would be secured by condition.

- 14.10 Long and short-stay cycle parking would be provided for all. Short-stay cycle parking would be provided for the public in the public realm close to proposed ground floor uses and activities. Long-stay cycle provision for residential and non-residential uses would be provided in accordance with the London Plan standards and include changing and shower facilities where required. The cycle parking provision will be required to cater for the needs of different types of cycles in line with the London Plan and the guidance in the London Cycling Design standards accommodating handcycles, cargo and tandem bikes.
- 14.11 In terms of housing, the application documents confirm that 10% of the dwellings would be designed to be accessible or adaptable for wheelchair users in accordance with London Plan Policy D7.

Detailed M4 (3) Accessible Homes

Type	WB04 & WB05
1B/2P	20
2B/3P	27
Total M4(3)	47
Total Units (all)	456
% M4 (3)	10.3%

- 14.12 WB04 will provide 278 homes. 10% of the homes (28 out of 278) will be designed to meet Building Regulations requirement M4(3) 'wheelchair user dwellings'. The remainder (250 out of 278) will be designed to meet Building Regulations requirement M4(2) 'accessible and adaptable dwellings'. The units designed to meet M4(3) 'wheelchair user dwellings' are provided across multiple levels of WB04, as both 1b2p (20 units) and 2b3p (8 units) homes.
- 14.13 WB05 (T1 and T2) will provide 178 homes, and at least 10% of the dwellings (19 out of 178) will be designed to meet Building Regulations requirement M4(3) 'wheelchair user dwellings', and the rest (159 out 178) will be designed to meet Building Regulations requirement M4(2) 'accessible and adaptable dwellings'. The units designed to meet M4(3) wheelchair user dwellings are provided across multiple levels of WB05-T1 and T2, as 2b3p homes (12 in WB05-T1 and 7 in WB05-T2).
- 14.14 The PBSA provision provides 10% accessible bedrooms. Students using wheelchairs will be able to access bedrooms on all floors of WB03 and the first-floor amenity provision using the lifts. Width of access corridors has been improved and the accessible WC moved to a more private and convenient location.
- 14.15 The site is well-served by public transport, including access to three London underground stations. Earls Court is a step-free tube station; the Earls Court Road entrance provides lift access between street and platform levels. This

station has lifts to and from the Piccadilly Line platforms and interchange between the District Line platforms. West Brompton station has step-free access via lifts between the street and Platform 2 for eastbound District Line services, and Platforms 3 and 4 for London Overground services only. There is no step-free access to the westbound District Line platform. West Kensington station has no step-free access from street level or platform level. Improvements to the West Brompton and West Kensington stations have been identified and the potential to enhance step-free access to both stations has been explored in the supporting Transport Assessment. Subject to TfL securing the necessary funding, mitigation measures would involve the reconfiguration of both West Brompton and West Kensington stations. Both stations would be provided with new entrances and additional gates. At West Brompton, the stairs to Platform 3 would be replaced with a new high-level walkway and a widened walkway to Platform 4, as well as a further step-free connection to Platform 1. Improvements to bus stop infrastructure and the provision of a replacement bus layover on Lillie Road would improve operations and provide improved facilities for all.

- 14.16 All fire escape routes within the proposed development are step-free using EVAC lifts, slopes and ramps. All gates and doors along the routes would be sized in accordance with Approved Document M and ramps and corridors would be sized accordingly to allow a minimum 1500mm clear width and handrail in line with Approved Documents M and K. Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.
- 14.17 Signage and wayfinding will be important for navigating the site and should be designed to be legible, and consistent through the different phases of the development. Details of signage and wayfinding will be secured by condition.
- 14.18 Despite the significant change in levels across the site, officers consider the proposals have embraced inclusivity as part of the design proposals, acknowledging the diversity and needs of all groups, including the elderly, persons with physical or sensory disabilities and creating a place for all. Work is expected to continue with the PRIP and Access for Disability to interrogate, comment and refine design principles if required for reserved matters approval to ensure an inclusive and accessible approach to landscaping and buildings.
- 14.19 Overall, the Proposed Development would deliver a high quality, accessible, inclusive and sustainable place in accordance with the relevant planning policies and inclusive design principles. The proposal has been designed to ensure that the site meets the highest standards of inclusive design in line with London Plan Policy D5 and Local Plan DC2. Subject to further design details and a condition secured relating to an Inclusive Access Management Plan, it is considered that the proposal accords with the access-related policies outlined above.

Fire Strategy

- 14.20 Paragraphs 96 and 102 of the NPPF seek to ensure that planning decisions promote public safety and consider wider security and defence requirements. They should anticipate and address all plausible malicious threats and natural hazards and create safe, inclusive and accessible places that have high levels of amenity and do not undermine quality of life, community cohesion and resilience to crime and disorder.
- 14.21 London Plan Policy D12 requires that all developments achieve the highest standards of fire safety to ensure the safety of occupants and efficient evacuation in case of an emergency. Policy D12(B) of the London Plan covers: the building's construction: the methods, products and materials proposed to be used; the means of escape for all building users and the evacuation strategy; features which reduce the risk to life such as fire alarm systems, passive and active fire safety measures and associated management and maintenance plans; access and facilities for the fire service personnel; how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building and ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures. London Plan Policy D5 further mandates that the building design incorporates provisions for safe and dignified emergency evacuation for all users, including those with reduced mobility. If adopted, the draft London Plan Guidance Fire Safety (February 2022) will be considered in the ongoing design of the Proposed Development and when discharging any conditions relating to the Detailed Component and considering future reserved matters applications.
- 14.22 A Site-Wide Fire Strategy has been prepared by Hoare Lea that describes the site-wide elements of the fire strategy for the development. It includes details relating to site access to buildings and includes a Fire Tender Access Plan, fire hydrants, green walls and roofs, subterranean areas, and fire protection measures to cycle stores and electric vehicle charging areas.
- 14.23 Detailed Fire Statements have been prepared by OFR Consultants for Development Plots WB03, WB04 and WB05. The Fire Statements demonstrate how the development proposals for the Detailed Component would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The statements do not constitute the final fire strategy reports for these buildings. These will be updated as the design progresses to form part of the Gateway 2 submission later in the design process and as required by the Building Regulations. The Fire Statement prepared at this stage nevertheless provide a summary of the key fire safety features in line with Policy D12 of the London Plan, whilst meeting the intent of Policy D5 of the London Plan 2021.
- 14.24 Planning Gateway 1 was introduced as part of the Building Safety Act 2022 and in the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021. This is required where proposals comprise one or more buildings that have more than two

dwellings and are 18m or more in height or contain 7 or more storeys. The Detailed Fire Statements prepared by OFR (updated in July 2025) are such 'Gateway 1' statements.

- 14.25 The Gateway 1 form states that consultation was undertaken ahead of the planning submission on issues relating to the fire safety of the development and what account has been taken of this. Pre-application meetings were held with the Health & Safety Executive in 2023 and high-level meetings with the Building Control departments of LBHF and RBKC in 2023 and 2024. The Building Safety Regulator (Gateway 2) is the next critical approval stage under the Building Safety Act before construction can begin. This requires developers to submit detailed plans for higher-risk buildings to the Building Safety Regulator for approval. This submission requires the building's design complies with all building regulations and fire safety standards. Subject to approval a BSR (Gateway 2) would be submitted for approval.
- 14.26 Plot WB03 is designed for a purpose-built student accommodation (PBSA) building, with commercial and ancillary amenities at podium level over lower ground, ground and first floors. Student accommodation is a form of residential accommodation from a fire perspective. Accessible student accommodation however falls under sleeping accommodation covered in 'Approved Document M Volume 2: Buildings other than dwellings'. WB-03 proposals would include accessible rooms within cluster flats and accessible studio flats. Therefore, the use is described as not being a residential use for Part M Building Regulations purposes.
- 14.27 The residential areas of WB03 will be served by two escape stairs: one fire-fighting stair and one protected escape stair. The fire-fighting stair will be protected on all levels by a mechanically ventilated lobby (supply and exhaust). The common corridor will be mechanically ventilated by smoke shafts (supply and exhaust), separate to the lift lobby. An automatic fire detection system will be fitted throughout together with sprinklers, emergency lighting and secondary power supply. Throughout WB03, internal fire spread will be restricted by compartmentation.
- 14.28 The residential portion of WB04 will include four lifts which may be used by residents in day-to-day operation. Two of these lifts are designed to be used as well for the evacuation of building residents, in the event of a fire. All four lifts operate as firefighting lifts, but only two of these are proposed to provide the dual functionality of evacuation and firefighting. Also included is a fire detection and alarm system, smoke and heat detection systems, smoke ventilation systems, sprinklers and an evacuation alert system (EAS) together with emergency lighting and secondary power supply.
- 14.29 Plot WB05 comprises two residential buildings: WB05-T1 and WB05-T2. A detached single storey building for the community hall is included within the development plot but not covered in the submitted fire statement. It will be covered within the reserved matters application. The residential ancillary areas (including cycle stores, refuse stores, and plant rooms) are linked to the fire systems.

- 14.30 All lifts will be specified as either firefighting lifts or dual use firefighting / evacuation lift. For WB05, each tower has two dual use firefighting / evacuation lift are included, one in each core. One additional evacuation lift will be provided in the southern core for T1 and the northern core for T2, dedicated to evacuation. The dual-purpose functionality provides additional redundancy.
- 14.31 In addition, the following measures for emergency road vehicle access and water supplies for firefighting purposes are proposed to be provided:
- The primary access into WB03 for fire appliances would be via Empress Place Boulevard to the east (which is accessed from Empress Place).
 - The primary access into WB04 is via Empress Place to the east, with a secondary emergency vehicle access proposed to the northwest from Aisgill Avenue and Aisgill Gardens.
 - The primary access into WB05 would be via Aisgill Avenue to the west.
 - New fire hydrants provided within 90m of an entry point to the building, not more than 90m apart and within 18m from an appropriate fire appliance parking location.
 - A firefighting shaft with a wet riser will be included in WB03, WB04, and WB05-T1 as well as a wet riser in the protected stair of WB03 and WB04.
 - A firefighting shaft with a dry riser will be included in WB05-T2 as well as a dry riser in the protected stair.
- 14.32 The HSE are generally supportive of the information provided at this stage for the Detailed Component. The HSE however highlight that there is presently insufficient fire safety information available in relation to the outline part of the planning submission such that they are unable to fully comment on this part of the hybrid application. The HSE therefore recommend conditions requiring the submission of a satisfactory fire statement with any reserved matters application, and that the HSE be consulted ahead of the Local Planning Authority's consideration of any reserved matters application.
- 14.33 The Site-Wide Fire Strategy report would continue to be developed as the design proposals progress through the outline component to demonstrate compliance with the Building Regulations, and to ensure that the proposal achieves the highest standards of fire safety. The Site-Wide Fire Strategy demonstrates that the proposals have considered fire safety at the earliest stage, which will be further developed for both the masterplan and for all buildings located on the site, to be submitted at the appropriate time.
- 14.34 The Council has reviewed the submitted Site-Wide Fire Strategy and Fire Statements prepared to date and has confirmed that these are in accordance with Policies D5 and D12 of the London Plan. A condition would ensure that the Detailed Component of the development is undertaken in accordance with the approved Fire Statements and that further Fire Statements will be necessary for future reserved matter applications. Accordingly, officers consider the proposed development is acceptable in terms of fire safety.

Designing out Crime

- 14.35 London Plan Policy D11 (Safety, security, and resilience to emergency) states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity, and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and wider area. Local Plan Policy DC2 requires developments to be designed in line with the principles of Secured by Design.
- 14.36 The security proposals to protect the building, its users, and new areas of public realm have been developed. A private security and surveillance strategy would be provided by the Estate to ensure the safety of all residents and visitors. CCTV would be delivered across the Site with each phase, and the feed would be shared with the police and Borough services. The Applicant propose participation in Borough Resilience Forum and Community Safety Partnership.
- 14.37 The Applicant has engaged with the Metropolitan Police's Design Out Crime Officer at the pre-application stage and has incorporated various recommendations into the proposed design. The security strategy provisions for the development include external lighting in the areas accessible to the public and along routes that are adequate to support CCTV and natural surveillance by the estate management team, the public, residents and employees. A condition would secure a detailed statement, setting out how the scheme would achieve Secured by Design accreditation to be prepared in consultation with the Design Out Crime Officer. Subject to this condition, the proposal has demonstrated compliance with the principles of Policy DC2 of the Local Plan.
- 14.38 The Police have been consulted on the submission and have provided a number of comments and advice to the applicant at pre-application stage on the Detailed Component. This included ensuring there are sufficient access controls, Hostile Vehicle Mitigation (HVM) review, to protect against vehicle-based threats like terrorism or vandalism, and adequate CCTV installation.
- 14.39 It is recommended that full details of security measures be secured by condition and within the various management plans which would also be secured by condition or in the Section 106 obligation, which would be assessed in consultation with the City Police Design out Crime and Counter Terrorism teams.

Community Safety & Security

- 14.40 The size of the proposed development and increase population from either persons living, working or visiting the site, will inevitably bring security and safety issues. The Applicant have set out an Estate Management Strategy, for the site for operation / security / maintenance purposes. They advise that private security and surveillance will be provided on site and paid for by the estate, to ensure the safety of all residents & visitors. CCTV would be delivered across the estate at each phase, with feed shared with the police and LBHF.

- 14.41 The borough controls CCTV in RBKC and H&F and would require direct access and control of the public realm cameras on the site to add to the existing cameras on the network. The Council CCTV team recommend bringing the Site directly onto the borough's network, via its dedicated service to ensure greater visibility, support, crime prevention and detection. The Borough's CCTV advise that the CCTV will need to meet the borough's standards and be directly monitored by us, with the current 20-year build programme, the CCTV network will need to be updated. The Borough's community and safety team advise that a financial obligation should be secured for the installation maintenance, monitoring of the CCTV system and to meet the continuing pressures on the borough to fund victims and provide access to services to address the abuse against all genders, including ending violence against women and girls (VAWG). The borough launched its first VAWG strategy in 2015 and has its existing strategy in place until 2027. A contribution is included towards community and safety which will be secured under the by section 106 agreement.
- 14.42 In major developments of the height and scale proposed, appropriate measures should be taken into consideration as part of the planning application process, to design appropriate features to ensure the risk of suicide is minimised. The development team have sought to address these risks at an early stage of the design process of the detailed building plots and further consideration would be included as part of reserved matters applications. These features could include planting or barriers near edges of balconies and terraces, as well as erecting balustrades. Additional safety measures will need to be secured to the high-rise buildings to prevent people from jumping or falling. The Building Regulations will require features on stairs, ramps, floors and balconies and any roof to which people have access to protect people. The proposal, subject to conditions and S106 obligations, is considered to be in accordance with London Plan Policy D11, and Local Plan Policy DC2.

15 AMENITY CONSIDERATIONS

- 15.1 The application site is surrounded by a number of properties that could be affected by the development during demolition, construction or operation works. The effects and their impacts are identified and considered in the supporting Environmental Statement (ES), ES Addendum and other supporting documents.
- 15.2 Some of the key objections received from residents concern the impact of the proposed development on residential amenity. Matters relating to impact on daylight/sunlight and overshadowing plus loss of outlook, overlooking and privacy have been raised. These matters are addressed below.
- 15.3 The NPPF sets out that when considering proposals for new development, care should be taken to ensure that there isn't a loss of amenity for current or future occupiers. This could arise because of several issues, including noise or disturbance, impacts on privacy, loss of daylight or sunlight, artificial lighting or odour.

- 15.4 There are no specific policies on daylight, sunlight or overshadowing in the Local Plan. **Local Plan Policy DC2** (Design of New Build) however states that all new builds must be designed to respect good neighbourliness and the principles of residential amenity. **Policy DC1** (Built Environment) and **DC3** (Tall Buildings) require development to be well designed and respect of the principles of good neighbourliness. **Policy HO11** includes requirements for residential developments to avoid detrimental impacts on the amenities of residents in the surrounding area 'including issues such as loss of daylight, sunlight, privacy and outlook'. **Key Principles HS6 and HS7** of the Planning Guidance SPD (2018) seek to protect the existing amenities of neighbouring residential properties, in terms of outlook, light, and privacy

Daylight, Sunlight, Overshadowing and Solar Glare

- 15.5 **Paragraph 130 (c) of the NPPF** states when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (if the resulting scheme would provide acceptable living standards). **Paragraph 135 (f)** sets an expectation that new development will be designed with a high standard of amenity for existing and future users.
- 15.6 **Policy D6(d) of the London Plan** states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the useability of outside amenity space. **Policy D8** reiterates the importance of ensuring that tall buildings do not compromise the comfort and enjoyment of neighbouring residential properties and open spaces to new development. There are no specific policies about daylight, sunlight or overshadowing in the Local Plan. Both the Mayor's London Plan Guidance (Housing Design Standards) June 2023 and the Housing Supplementary Planning guidance (March 2016) refer to standards for privacy, daylight and sunlight and how to apply the BRE guidance.
- 15.7 Daylight, sunlight and overshadowing is considered against the Building Research Establishment's (BRE) guidance 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (BRE 209 3rd edition, 2022), which in turn references the British Standard BS EN17037:2018 'Daylight in Buildings'. The 2022 BRE guidelines introduced a new method of assessment for internal daylight and sunlight amenity within new developments.
- 15.8 There are no minimum mandatory requirements for daylighting in Building Regulations for England. The guidance set out in the BRE guide is however widely accepted as the approved methodology when calculating light levels in habitable rooms. The BRE guide however needs to be taken flexibly and contextually. The values set in BRE guidelines are derived on a suburban model may not be obtainable in more dense urban areas or in this case, a large-scale regeneration scheme in an Opportunity Area.

- 15.9 The BRE recommends measurements should be used to assess daylight within living rooms, dining rooms and bedrooms; with windows to the main living rooms given the most importance in the criteria. A combined dining/kitchen area is defined as a habitable room in residential properties. Smaller kitchens below 13m² and considered as 'non-habitable' in reference to the Major's House SPG are not included.

Daylight

- 15.10 The BRE Guidelines provide different methods to assess daylight for existing and proposed residential accommodation. A Vertical Sky Component (VSC) and No Skyline (NSL) assessment are normally carried out. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- 15.11 The **Vertical Sky Component (VSC)** calculates the amount of skylight received at the centre of an existing window from an overcast sky. The target value is at least 27% VSC or more. If this value cannot be achieved, the skylight to the existing window should not be reduced by more than 20% (0.8 times) of its the current value, as this may be deemed to have a noticeable impact on daylight levels.
- 15.12 The **No Skyline (NSL)** assessment (also known as Daylight Distribution test) measures the distribution of daylight within an existing room. The BRE advises that an existing room may be affected if the area of the working plane in a room which can receive direct skylight is reduced by more than 20% (0.8 times) of its current value. The Interior Illuminance assessment in the current updated guidance is an alternative climate-based daylight test which uses target illuminance (lux) values.
- 15.13 Where reductions do not meet BRE Guidelines (for daylight and / or sunlight), ordinarily the reductions will be noticeable. Transgressions not meeting the target BRE Guidelines for daylight, are considered in reference to broad reduction adversity as follows:
- Minor Adverse: Reductions in VSC or NSL of >20% to 30%.
 - Moderate Adverse: Reductions in VSC or NSL of >30% to 40; and
 - Major Adverse: Reductions in VSC or NSL of greater than 40%.
- 15.14 Alternative target values for skylight to neighbouring properties (daylight VSC) and sunlight, are often used in instance of a dense urban area setting. Alternative target values have been applied in this case.

Sunlight

- 15.15 To assess the impacts of the proposals on sunlight, the Annual Probable Sunlight Hours (APSH) for habitable rooms surrounding the development site are assessed. The BRE Guide recommends that the appropriate date for undertaking a sunlight assessment is on 21st March, this being the spring equinox. Consideration is given to the annual probable sunlight hours (APSH). Consideration of winter sunlight hours are also made. BRE guidance recommended that the APSH should be at least 25% of the annual total of which

5% should be from the winter months. When the proposed value falls short of this standard the reduction should be within 0.8 times of its former value. Only residential properties that face 90 degrees due south are considered by the test, with windows to the main living rooms given the most importance in the criteria.

15.16 The target number of hours of sunlight to be received within a proposed room are:

- Minimum level of sunlight exposure - 1.5 hours
- Medium levels of sunlight exposure - 3 hours
- High levels of sunlight exposure - 4 hours

15.17 A review of the provision of daylight and sunlight within the proposal has been carried out in accordance with the BRE Guide which highlights the specific recommendations for daylight provision in UK dwellings derived from a UK National Annex which gives specific minimum illuminance recommendations (in lux) for habitable rooms in dwellings.

Overshadowing

15.18 The impact of overshadowing of gardens and open spaces is considered in the BRE guidance. It recommends that for an open space to appear adequately sunlit through the year, more than half of the space should receive at least two hours of sunlight at the March equinox. Overshadowing to the proposed communal amenity spaces has been assessed in accordance with BRE guidance, which recommends that at least 50% of an amenity area should receive a minimum of two hours of direct sunlight on 21 March.

Daylight/Sunlight Assessment

15.19 A Daylight and Sunlight Assessment is submitted and is contained within Volume 1, chapter 15 of the ES, chapter 15A of the ES Addendum and Volume 3, Appendix A of the ES. The impacts on external (i.e. in relation to properties neighbouring the Site) and internal (i.e. within the Proposed Development) have been considered, along with overshadowing, solar glare and light spill.

15.20 A Vertical Sky Component (VSC) and No Skyline (NSL) daylight test have been carried out, as well as the Annual Probable Sunlight Hours (APSH) test to assess the impact on hours of sunlight received over a typical year and in winter months. An overshadowing assessment is also presented to show how the sunlight impact would manifest itself at different times of the day and different times of the year on open spaces. Impacts on external (i.e. in relation to properties neighbouring the Site) and internal (i.e. within the Proposed Development) daylight and sunlight levels have been assessed, along with overshadowing, solar glare and light spill have been assessed.

15.21 A 3D computer model for the testing of daylight, sunlight (and overshadowing) has been created from the drawings of the two hybrid planning applications submitted to LBHF and RBKC. Further information via floorplans and room use information obtained for receptors has been included in the assessment.

- 15.22 All the residential properties (or receptors) closest to the proposed development which either face directly on to the development site or have an unobstructed view of the development site have been tested, as well as existing amenity areas surrounding the site.
- 15.23 Amendments to the application have been considered in the ES Addendum. Design refinements to the Parameter Plans, which include a cutback to the Outline Plot WK02 (in LBHF), opposite Kensington Hall Gardens (Beaumont Avenue) have been taken into consideration.
- 15.24 For the July 2024 assessment, the ES reviewed in total 438 existing daylight receptors and 271 existing sunlight receptors. In the ES Addendum the results of 415 of the daylight receptors and 250 sunlight receptors were considered to remain valid based on a qualitative review of the proposed amendments and further considerations given.
- 15.25 Further assessments were carried out in the ES Addendum for the remaining 22 daylight and 21 sunlight receptors (for both Early Phases and All Phases). One receptor (177 North End Road) was removed due to being identified as non-residential use. In addition, the Mund Street School site scheme, as new future sensitive receptor has been qualitatively considered in the ES Addendum in relation to daylight and sunlight effects.

Alternative Targets for Daylight and Sunlight

- 15.26 Alternative Targets values have been considered as appropriate means of testing this development, due to the minimal massing currently on the site and the existing higher levels of daylight and/or sunlight for some neighbouring properties. The approach for Alternative Target values is referenced within Appendix F of the BRE Guide.
- 15.27 With exception to the existing buildings on the Lillie Road Depot land and the low-rise properties in Empress Place and Lillie Road, the site is a predominantly cleared site and has been that way for over more than a decade. The site is designated in an Opportunity / Regeneration area, and consideration has been given to appeal cases on how alternative targets values might be suitable within a similar urban context. As in the case of the BRE Guide default target criteria, Alternative Target values should be considered flexibly given other factors may also be relevant to the window or room under consideration.
- 15.28 The current existing massing versus the proposed massing scenario (Maximum Parameters), for an all-phased development scheme is the main scenario that has been tested. The 'Maximum Parameters' scheme represents the 'worst case' scenario, in terms of what neighbouring occupiers of surrounding residential properties (and any other buildings applicable for review) would experience if the scheme is granted consent and built out.
- 15.29 Alternative scenarios have been presented in the assessment for consideration. This includes an 'Illustrative Scheme' review. This is not the application scheme and provides an indication of just one future possible design outcome that could come forward. Similarly, the site benefits from the 2013

consent scheme. The site area for the current application is different, and implementation could not actually occur in its entirety. Existing properties on the West Kensington and Gibbs Green Estate, previously within the 2013 OPP application site boundary were not applicable for testing at the time. These retained neighbouring properties now need to be considered for the current proposals, as all fall outside of the application site boundary. For this reason, officers do not consider the 2013 consented scheme an appropriate assessment.

- 15.30 The daylight consultant acting for the Applicant has put forward a number Alternative Targets values for reviewing impacts on daylight, including the use of a lower retain VSC value of 15% or above, instead of the standard 27%. The GLA is generally supportive of a “mid-teens” VSC alternative value being used for development in inner city locations. There are also various appeal decisions (primarily in inner city / regeneration areas) that have provided some support of acceptance of ‘mid-teen’ VSC approach. In line with this approach, the Council is supportive of the use of higher values within the mid-teens is the preference but isolated instances of a VSC of 15% may be acceptable in applicable instances at the lowest floor.

Assessment

- 15.31 The Daylight and Sunlight report and supplementary information submitted in support of the application have been reviewed by officers and a daylight / sunlight advisor appointed by the Council (Schroeders Begg (UK) LLP). As the Earls Court Site and the development proposals extend across two London boroughs, a similar assessment has been carried out by RBKC officers and their appointed daylight/sunlight advisor (Consil Ltd.). The conclusions outline in the committee report relate primarily to the daylight, sunlight and overshadowing considerations of the development proposals which falls within LBHF.
- 15.32 As this is a hybrid application, a detailed model of the proposed three Development Plots (WK03, WK04 and WK05), alongside the maximum building envelope of each Development Zone created by the parameter plans in the outline component have been taken into consideration. Officers are satisfied that the daylight and sunlight assessment presented considers the ‘worst case scenario’.
- 15.33 Temporary conditions during the demolition and construction works have been considered. The impacts from the works would be temporary in nature for short-to medium-term periods whilst the development plots are built out. The impacts and effects of the development would increase over time of the build programme up to the point of the completion of the development which is currently projected in 2043.
- 15.35 A two-stage process to the daylight and sunlight assessment has been carried out. First the properties where the BRE numerical targets are not met using the baseline targets was considered followed by an assessment on whether the resulting harm identified is unacceptable considering site-specific factors, policy objectives, and planning balance.

15.36 The Alternative Target Criteria used included:

- Reduced weight for less sensitive uses (i.e. bedrooms, small kitchens)
- Treating kitchens under 13 sqm as non-habitable rooms, in line with the local authority and the Mayor's Housing SPG
- Acceptance of inherent contextual obstructions (i.e. balconies, outriggers, overhangs)
- Apply flexibility for deeper layouts and single-aspect rooms
- Acknowledgment that existing low baseline values can lead to disproportionate percentage reductions
- Accept the use of borough-wide average VSC values to contextualise retained VSC levels where appropriate
- Agreement that 15% retained VSC and above can be considered acceptable for lower-floor windows, where justified and supported by precedent from the consented scheme.

15.37 In summary, the Council's Daylight and Sunlight consultant is generally in agreement on the methodology, scope, and general conclusions of the assessment. The scope and extent of surrounding properties tested, and amenity areas analysed is considered comprehensive and appropriate for a site of this scale. A small number of differences were identified regarding the interpretation of specific results or the application of alternative targets. Whilst the use of Alternative Targets presented with the application are generally supported as background information the focus has been on the Maximum Parameters Scenario as a "worst-case" comparator for assessing neighbour impacts.

Daylight Assessment

15.38 The effects of the proposal upon daylight of existing neighbouring properties, in terms of daylight has been considered. Both the Vertical Sky Component (VSC) and daylight distribution i.e. no Skyline / NSL (where room layouts are known / reasonably inferred) have been reviewed as per the BRE Guide.

15.39 In relation to the initial baseline assessment, 438 properties were tested. In total, 3,874 of the 7,041 windows (55%) tested would meet the BRE VSC recommendation of 27 % and 1,626 of the 2,115 rooms (76.9%), where layouts were obtained, would meet the BRE recommendation for NSL. Including the cumulative schemes assessed, the daylight VSC found 538 of the 638 windows tested (84.3%) would meet the BRE recommendation of 27% in the existing baseline condition and 280 of 281 (99.6 %) rooms would meet the BRE recommendation for NSL.

15.40 In summary, 76% of the properties would see no significant adverse effects for a completed development. Where significant effects were identified 22% of the properties assessed would meet or would substantially meet the alternative target criteria. The following 2% would not meet the alternative target criteria. The properties identified are:

- 40-42 Lillie Road (LBHF)

- 7 Aisgill Avenue (LBHF)
- 7-9 Lillie Road (LBHF)
- 1 and 55 Eardley Crescent (RBKC)
- 25 Philbeach Gardens (RBKC).

15.41 The ES Addendum found no significant variation. Effects were identified for 285 of the 437 properties tested. In total 6,955 windows (55 %) would meet the BRE recommendation of 27% in the existing baseline condition. Of the remaining 152 properties which were found to experience noticeable and significant adverse effects to daylight, a Stage 2 alternative target criteria assessment was carried out

15.42 Using the alternative target criteria assessment the results have concluded that:

- 96 properties would meet the alternative daylight target criteria and would be acceptable in consideration of context
- 38 properties would substantially (for the most part) meet the alternative daylight target criteria and would be acceptable in consideration of context; and
- 18 properties would not meet the alternative daylight target criteria

15.43 In summary, 65% of the properties would see no significant effects following the baseline assessment and 31% of the remaining properties assessed would meet or substantially meet the alternative target criteria whilst the remaining 4% would not meet either the baseline or alternative target criteria. These are:

- 40-42 Lillie Road (LBHF)
- 9-28, 29-38 Gibbs Green (LBHF)
- 1, 2, 3-8, 9, 10 and 14 Dieppe Close (LBHF)
- 14B, 14C and 14D Aisgill Avenue (LBHF)
- 7 Aisgill Avenue (LBHF);
- 7-9 Lillie Road (LBHF);
- 1 and 55 Eardley Crescent (RBKC); and
- 25 and 35 Philbeach Gardens (RBKC)

15.44 Of the remaining 22 receptors re-assessed in the ES Addendum, the daylight assessments.

15.45 From the 242 neighbouring property groups within LBHF considered for daylight, circa 70 are considered in terms of reductions to exceed the 30% BRE Guide default target criteria (beyond 'minor adverse' transgressions). The assessment of

- Kensington Hall Gardens (Nos: 1-10, 11-20, 21-35, 36-45, 46-55)
- North End Road (No.177)
- Dieppe Close (Nos. 21-26)
- Dieppe Close (Nos: 1, 2, 3-8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20)
- Lillie Road (Nos: 28, 30, 32, 34, 36, 38, 40-42, 44, 52)
- Lillie Road 7-9, 11-15 (Hub Premier Inn); 17, 19 (The Lillie Langtry) and 23-33 (Hotel Lily)

- Edith Villas: West Kensington Court: 1-30 Falkland House
- Mornington Avenue: Whiteley's Cottages: Nos: 21-35, 28-30
- Gibbs Green: 1-8, 9-28, 29-38, 101-130, 147-160
- Garsdale Terrace: No: 1-7
- Aisgill Avenue: Nos: 16, 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 14B, 14C, 14D and Nos: 1, 3, 5, 7
- Ivatt Place Flats: 1-88 Fairburn House

15.46 In summary, the following properties below are considered to have daylight effects which are 'major adverse':

- Kensington Hall Gardens: Flat Nos. 1-10, 11-20, 46-55
- Lillie Road: Nos. 7-9, 17 and 28
- Gibbs Green: Nos. 9-28, 29-38 and 147-160
- Dieppe Close: Nos. 3-8 and 9-15

15.47 Whilst the reductions upon daylight to these properties is noticeable it is considered that these are acceptable. A cut back to outline volume massing of Plot WK02 (north-west corner of site), has mitigated slightly the effects of the scheme on the properties listed in Kensington Hall Gardens compared to the original application proposals.

Sunlight

15.48 There are a significant number of properties surrounding the site not applicable for a sunlight analysis, as their windows do not face within 90° of south. In total, 271 receptors have been tested, and no significant effects were found for 199 properties.

15.49 In the initial July 2024 ES assessment, 1,964 of the 2,352 rooms (83.5%) would meet the BRE recommendations for APSH and WPSH. The 205 rooms assessed for the cumulative schemes would also all meet the BRE recommendations for APSH and WPSH. In the July 2025 ES Addendum 1,925 of the 2,297 (84%) rooms would meet the BRE recommendations for APSH and WPSH.

15.50 Of the remaining 72 properties which would experience noticeable and significant adverse effects to sunlight, an alternative target criteria assessment concludes that:

- 39 properties would meet the alternative sunlight target criteria and would be acceptable in consideration of context;
- 25 properties would substantially (for the most part) meet the alternative sunlight target criteria and would be acceptable in consideration of context; and
- 8 properties would not meet the alternative target criteria.

15.51 The focus has been upon living rooms (and conservatories where applicable). Kitchens and bedrooms are considered less significant in the BRE Guide. Overall, the effects are considered as 'negligible'. No properties were identified with a 'major' adversity and only a small number of properties with a 'moderate' impact. The following properties are classified with a 'moderate' sunlight impact:

- Mornington Avenue: Nos. 17, 19 & 21-35, 28-30

15.52 On balance whilst there will be some noticeable reductions to Flats in Mornington Avenue (north of the A4). However, these relate to a relatively limited number of rooms within a number of properties.

Daylight/Sunlight/Overshadowing within the application scheme

15.53 The provision of daylight and sunlight within the proposed development has been considered. Revised analysis has been submitted for the detailed plots (WB03, WB04 & WB05). The daylight provision particularly for Buildings WB05-T1 & T2 has compared with the original submission.

15.54 Based on the design amendments made to the detailed plots, circa 88% of the residential dwelling habitable rooms for Buildings WB04, WB05-T1 & T2 will meet BRE targets (including allowance for the lesser target provision of 150 lux when considering Studios and Living/Kitchen/Dining rooms). The level of compliance achieved for the Class C3 residential properties within the detailed component is considered acceptable given scheme and its context.

15.55 For Plot WB03 (student accommodation building), the habitable rooms meeting the target lux is less (66%), with 499 habitable rooms out of 751 based upon 150 lux target (for studios). The studio units are proportionally, quite deep in their arrangement and layout and there would be a significant betterment if desks and kitchenette areas were isolated from the review. As the student use of this building (occupied by individuals on a relatively short-term basis as opposed to long-term residential accommodation) it is reasonable to apply some flexibility to the review in this respect. As the student use of this building (occupied by individuals on a relatively short-term basis as opposed to long-term residential accommodation) some flexibility to the review in this respect.

15.56 Overall the provision of sunlight to dwellings is considered reasonable within scheme along with sunlight provision to amenity areas.

Conclusion on Daylight, Sunlight Impact and Overshadowing

15.57 It is considered that the submitted daylight and sunlight assessment has correctly used the methodology, in the BRE Guidelines. In general, good standards of daylight and sunlight would be retained with alterations within acceptable parameters against BRE standards for daylight and sunlight. Some of the assessed windows and rooms will however see a reduction in levels more than BRE guidance for daylight and sunlight. This occurs as the existing baseline for these residential units is high for an urban environment and given the low-rise nature of the development which currently occupies the site.

15.58 There is currently a minimal level of levels of massing on site. A large proportion of the site was cleared in 2015-2017, following the demolition of the former exhibition centre buildings and has remained undeveloped since. For any meaningful development to come forward, transgressions from BRE Guide default target criteria are therefore inevitable. Given the site's designation in an Opportunity Area, the site is almost a cleared site in a dense urban

environment, it is considered reasonable for 'Alternative Targets' to be set for the assessment of this site. In addition, some existing constraints relating to some inherent sensitivities to some of the existing neighbouring properties have been taken into account.

- 15.59 Under the existing baseline condition, the effects of the proposed development do result in some noticeable reductions to neighbouring properties. However, through the application of Alternative Target criteria, officers consider the reductions identified are generally considered supportable. With the proposed cut back to outline volume massing of Plot WK02 the effects of the scheme compared to that forming the original application proposals on Kensington Hall Gardens in respect of the provision of daylight is now considered more reasonable.
- 15.60 As a result, it is not considered that the daylight and sunlight reductions warrant refusal of the application on those grounds. The daylight and sunlight for the neighbouring properties is considered to be appropriate for their urban context, in accordance with policy D6(d) of the London Plan 2021 and Policy DC3 of the Local Plan, and these properties are considered to still have acceptable living standards in accordance with Paragraph 130(c) of the NPPF.

Overshadowing of amenity spaces

- 15.61 Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces
- 15.62 The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the different times of the day and year when shadow would be cast over a surrounding area.
- 15.63 In terms of overshadowing, 400 No. amenity spaces (site wide within LBHF & RBKC) have been reviewed, based on the ability to receive 2 hours or more of sunlight on 21st March. In total 281 would meet BRE's recommendation of half the area receiving 2 hours + of sun on March 21st.
- 15.64 For the effect upon external amenity areas, where reductions are applicable, all meet the BRE Guide default target criteria with the isolation exception of 2 No. amenity areas and for which the reductions are considered limited (no. 6 Aisgill Avenue and 9 Beaumont Crescent).
- 15.65 Based on a qualitative review, additional cumulative significant adverse daylight, sunlight and overshadowing effects to existing receptors in proximity to both the Mund Street School site cumulative scheme and the proposed development have been considered.

Solar Glare

- 15.66 London Plan 2021 Policy D9 Criterion C (g) stipulates that (tall) buildings should not cause adverse reflected glare.
- 15.67 Solar glare occurs when light from the sun is reflected off surfaces such as solar panels and buildings. The effect of solar glare can result in visual impairment caused by reflection off surfaces which could for example result in distraction from activities such as driving, or cause discomfort to pedestrians. As a result, the impact of solar glare is particularly focused to areas such as pedestrian crossings, road junctions, or where glare could result in temporary blinding of drivers.
- 15.68 Solar glare effects can only be quantitatively assessed where the façade details of a proposed building have been submitted in detail. The ES Volume 1, Chapter 15 has scoped in both road and rail viewpoints with the potential to be affected by the proposed development, within an approximate 500m distance from the site boundary. A full Solar Glare technical assessment cannot be undertaken for the outline part of the application. The exact detailing of the elevations for the outline part of the application do not form part of the consideration at this stage. The detailed design of the future buildings within the outline component would come forward at the RMA stage. A 3D model of the detailed component within the Early Phases comprising the façade details of the detailed plots in Phase 1 (in both RBKC and LBHF) has however been considered.
- 15.69 In total 21 viewpoints along surrounding roads and junctions and 32 railway locations placed along the District Line and WLL have been identified in the ES as sensitive to solar glare and receptors to light spill including residential properties.
- 15.70 The proposed development would not be visible from 7 road viewpoints. The remaining 14 viewpoints could potentially see instances of solar reflections within 10 and 30 degrees of the driver's line of sight for short periods of time. In total 12 of these 14 viewpoints would experience only a Minor Adverse (not significant) effect with 7 located within the borough.
- 15.71 The proposed development would have a Negligible or Minor Adverse effect at 5 railway viewpoints selected with the remaining and a further 27 railway viewpoints experiencing a Minor Adverse (not significant) effect.
- 15.72 The remaining 14 viewpoints could potentially see instances of solar reflections within 10 and 30 degrees of the driver's line of sight for short periods of time. In total 12 of these 14 viewpoints would experience only a Minor Adverse (not significant) effect with 7 located within the borough.
- 15.73 Overall, the potential impact of solar glare from the proposed development is considered at it worse to be Minor Adverse but the effects are not significant.
- 15.74 The assessment concludes that no additional measures are required to mitigate the impact of solar glare. As a technical assessment at this stage is not feasible

without detailed design the ES categorised the impact from negligible to major adverse (significant). To ensure the impacts are mitigated through design a condition is recommended to secure Solar Glare Assessment at each Reserved Matters stage.

Light Spillage

- 15.75 **London Plan 2021 Policy D9 Criterion C (h)** indicates that buildings should be designed to minimise light pollution from internal and external lighting. **Local Plan Policy CC12** requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. The SPD states that light spill from development that could affect residential areas should be minimised in line with policy CC12 of the Local Plan.
- 15.76 Light spillage is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from commercial buildings onto residential accommodation, where this would cause nuisance to the occupants. It is measured through light intrusion assessments – this is the spilling light beyond the boundary of a proposed development, and it is assessed through vertical illuminance in lux, measured flat at the centre of the sensitive receptor.
- 15.77 Residential and other sensitive properties located approximately 30m from the proposed office uses would be sensitive to light spill have been included in the study area.
- 15.78 Light spillage from any proposed offices spaces within the detailed component onto nearby existing or proposed neighbouring occupiers can be tested. However, as the location of future offices uses is unknown for the outline component, a qualitative consideration of potential light spill cannot be provided at this stage and is reserved for the RMA stage. Whilst the submitted Lighting Strategy provides an appropriate overview of the potential lighting a condition is imposed requiring the submission of a detailed lighting strategy prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. Subject to the satisfaction of this condition, the development would comply with Local Plan Policy and has been designed to avoid light spill.

Conclusion

- 15.79 A comprehensive daylight, sunlight and overshadowing assessment has been undertaken to assess the potential impacts of the development on existing properties in the vicinity of the site, in accordance with the industry standard methodology established by the Building Research Establishment (BRE).
- 15.80 The assessment demonstrates that while a relatively large number of neighbouring properties and open spaces would experience very little or no tangible impact to existing levels of daylight, sunlight or overshadowing, some

close to the development boundaries would be adversely affected. Noting that the BRE's target levels are advisory and that the Mayor's Housing SPG underlines the need for their flexible application in Opportunity Areas, these impacts are described in the Environmental Statement as ranging from minor to moderate and major adverse in some cases.

15.81 With a large proportion of the development coming forward in outline only at this stage, the daylight and sunlight modelling is largely based on the maximum building envelope. Some of the impacts presented would naturally be reduced as the building heights and massing are broken down as part of the detailed design process for future phases.

15.82 Overall, the proposed development demonstrates a high level of compliance with daylight and sunlight standards, particularly given the constraints of the site. Where shortfalls occur, they are minor, well-justified by design intent, and mitigated by the provision of high-quality internal layouts and access to well-lit communal amenity spaces. The scheme is therefore considered to provide an acceptable standard of residential amenity in accordance with the NPPF, London Plan Policy D6, and Local Plan Policy HO11.

Aspect, Outlook and Privacy

15.83 The distances between the residential blocks, generally upwards of 20m, are sufficient to ensure that there are no significant issues in respect of privacy or restricted outlook. Having regard to the site's location and the urban density of surrounding development, the levels of aspect and outlook are acceptable in this context.

Overlooking and Privacy

15.84 Local Plan Policy DC2 seeks to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. Consideration has to be given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential or sensitive properties.

15.85 The proposed development would include a mix of residential and commercial uses with both office and public/cultural terraces on upper floor levels. The immediate surrounding properties mainly consist of the residential and commercial uses. Where residential properties are located within the vicinity, these are away from the immediate surrounds, and the additional impact of the terraces and office use would not cause additional overlooking opportunities to that of the existing dense urban environment.

15.86 The proposed development would result in an increased height and massing across the whole of the site with a tall buildings cluster located near the existing Empress State building. The proposed development would be located away from existing residential units, and it is considered that by reason of the nature of the dense urban environment and separation distances proposed, the proposal would not result in a greater impact to the nearby units to warrant refusal of planning permission on grounds of unacceptable overbearing impact to the nearby residential properties.

- 15.87 The separation distances between the Detailed Plots in the first phase are broadly compliant with the minimum distances set out in the Council's SPD, but where this hasn't been possible, the detailed design of individual elements of the proposed buildings has been carefully considered to reduce impacts.
- 15.88 For the outline component, the Design Guidelines address this point, setting out the individual relationships between Development Plots and existing surrounding properties need to be considered, having regard to the impact of Development Plots coming forward in terms of new land uses and their relationship with the surroundings at a particular point in time.
- 15.89 Overall, the scheme has been well designed to deliver a high standard of accommodation to future occupiers. On balance officers consider the proposals would not result in any undue overlooking, loss of privacy or overbearing impact on neighbouring occupiers. As such, it would comply with Local Plan Policy DC2.

16 HIGHWAYS AND TRANSPORT

- 16.1 NPPF para. 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe.
- 16.2 The NPPF requires that developments which generate significant movement are located where the need to travel would be minimised, and the use of sustainable transport modes can be maximised; and that development should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 16.3 In determining this application, consideration has been given to the requirements of London Plan Policies T1, T2, T4, T5, T6, T6.1, T6.5 and T7, as well as the Healthy Streets for London strategy, published by TfL, in assessing the effects on the local highway network along with the proposed car parking, cycling parking and servicing requirements.
- 16.4 London Plan Policy T4 requires new development to have an acceptable impact on the highway network, incorporating mitigation where necessary, adopting a Healthy Streets Approach with active modes of travel prioritised.
- 16.5 London Plan Policy T6 sets out the intention to encourage consideration of transport implications as a fundamental element of sustainable transport, supporting development patterns that reduce the need to travel or that locate development with high trip generation in proximity of public transport services. The policies also provide guidance for the establishment of maximum car parking standards in relation to hotel and leisure uses as well as blue badge

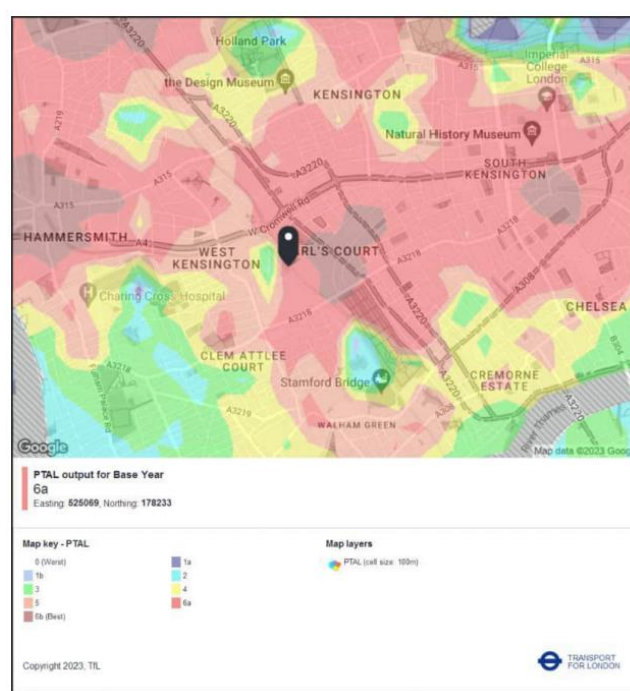
parking at Policies T6.4 and T6.5. London Plan Policy T5 sets out the requirements for cycle parking in accordance with the proposed use.

- 16.6 Local Plan Policy T1 sets out the Council's intention to work with strategic partners to improve transport provision, accessibility and air quality in the borough, by improving and increasing the opportunities for cycling and walking, and by improving connections for bus services, underground, national and regional rail.
- 16.7 Local Plan Policy T2 relates to transport assessments and travel plans and states "All development proposals would be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network".
- 16.8 Local Plan Policies T3, T4, T5 and T7 relate to opportunities for cycling and walking, vehicle parking standards, blue badge holders parking and construction logistics. Local Plan Policy CC7 sets out the requirements for all new developments to provide suitable facilities for the management of waste.
- 16.09 The following transport reports have been submitted in relation to this application:
- Healthy Streets Transport Assessment
 - Healthy Streets Transport Assessment Addendum
 - Transport Assessment Clarification Notes
 - Stage One Road Safety Audit
 - Framework Travel Plan
 - Framework Delivery and Servicing Management Plan
 - Parking Design Management Plan
 - Site Operations Management Plan
 - Construction Logistics Plan

Transport Context

- 16.10 From a transport perspective, the site benefits from excellent public transport connectivity. It is directly adjacent to three London Underground stations, Earls Court, West Brompton, and West Kensington providing access to the District and Piccadilly lines, as well as London Overground and National Rail services. Numerous bus routes serve the surrounding roads, including Warwick Road, Lillie Road, and North End Road, offering frequent services to destinations across London.
- 16.11 Earls Court LU station served by District and Piccadilly line can be accessed from Warwick Road directly east of the site. West Brompton station, served by District line and the London Overground network is located directly to the south of the site on Lillie Road. And at the northwest of the site is West Kensington LU station served by District line trains.

- 16.12 Bus stops can be accessed on Lillie Road, Old Brompton Road, North End and Warwick Road, with a total of eight routes (C1, C3, 28, 74, 190, 306, 328 and 430) to a variety of destinations.
- 16.13 The majority of the site benefits from excellent public transport accessibility, with much of the area achieving a PTAL rating of 6a (the second-highest level on the scale from 0 to 6b). This is largely due to its proximity to three London Underground and Overground stations, as well as numerous bus routes. However, given the size of the site, PTAL levels vary. While most of the site enjoys a rating of 6a, certain sections particularly along North End Road and around the West Kensington and Gibbs Green Estates experience lower accessibility levels, with PTAL ratings of 4 and 5 (which is rated as very good), illustrated on the PTAL map for the application site.



- 16.14 The site is bounded by West Cromwell Road (A4) to the north, Warwick Road (A3220) to the east, and Lillie Road and Old Brompton Road to the south. It is also adjacent to the West London Railway Line (WLL), which bisects the site. Warwick Road and West Cromwell Road both form part the Transport for London Road Network (TLRN) for which TfL is the highway authority. Old Brompton Road, Lillie Road, and North End Road, plus the various largely residential streets surrounding the site are all borough controlled. The 'Northern Access Road' links the RBKC side of the site to the Tesco supermarket carpark at 100 West Cromwell Road, running under the A4 and linking to Fenelon Place to the north.
- 16.15 The pedestrian environment around the site is well-developed, with footways along all major roads and good access to local amenities such as shops, schools, healthcare facilities, and parks.

- 16.16 Cycling infrastructure in the vicinity of the site is fragmented. Advisory cycle lanes exist on Lillie Road and Old Brompton Road, and Quietway 15 begins nearby on Kempsford Gardens. The development includes proposals to create dedicated north-south and east-west cycle routes through the site and to enhance connections to the wider network. The development plans to integrate micromobility hubs within the site to support short-distance travel and reduce reliance on private vehicles.
- 16.17 Parking in the surrounding area is controlled, with most streets operating under Controlled Parking Zones (CPZs) and restrictions on duration of stay. The development proposes minimal on-site parking, prioritising disabled users, car clubs, and essential visitors.
- 16.18 In terms of safety and accessibility, the Transport Assessment submitted with the application includes a detailed Active Travel Zone (ATZ) and Safety Inclusion Assessment. These studies highlight opportunities to improve pedestrian crossings, lighting, and footway conditions, particularly around key junctions and routes to transport hubs. The assessments also consider the needs of vulnerable users, including women and girls, and recommends targeted interventions to enhance comfort and security.

Development Overview and Phasing

- 16.19 The proposed development is planned to be delivered in eight main phases over a 19-year period. The Early Phases are expected to be completed by 2037. All-Phases scenario, representing full build-out, is targeted for completion by 2043. The Transport Assessment submitted with the application assesses both scenarios to understand transport impacts over time.
- 16.20 Phase 1 (Detailed Component) covers three Development Plots: WB03, WB04 and WB05 (within LBHF) and two in plots EC05 and EC06 (RBKC). The remaining development plots in Phase 1, including WB06 in LBHF, are submitted in outline form.
- 16.21 The other phases will come forward in outline form, with the Development Specification, Parameter Plans and Design Codes providing details of the maximum parameters for each development zone, and codes to manage their future design and appearance.

Transport Strategy

- 16.22 The transport strategy aims to support a modal shift away from private car use, promote active travel, and enhance public transport connectivity. The strategy is aligned with the London Plan, the Mayor's Transport Strategy, and local planning policies, and it responds to emerging trends such as hybrid working, micromobility, and low-emission transport.
- 16.23 The transport strategy is structured around a hierarchy of movement that places pedestrians at the top, followed by cyclists and public transport users, with private vehicles occupying the lowest tier. This approach is designed to create

a 'people first' public realm that encourages walking and cycling and reduces reliance on cars. Key elements of the transport strategy include:

- Pedestrian access: A network of gateways and secondary access points will ensure permeability across the site. Routes will connect to surrounding streets and transport nodes, with improvements to crossings and footways.
- Cycling and micromobility: Dedicated cycle routes will traverse the site, linking to existing and proposed infrastructure. Secure cycle parking, micro-mobility hubs, and e-bike docking stations will support active travel.
- Public transport: Enhancements to station access, bus stop facilities, and interchange points will facilitate seamless travel. The Lillie Road Bus Layover will be reconfigured to accommodate increased demand and improve efficiency.
- Vehicular access: Vehicle movements will be restricted to the site's periphery, with controlled access zones to protect pedestrian areas. Servicing, emergency access, and limited parking will be carefully managed.
- Parking strategy: A car-lite approach will be adopted, with parking limited to disabled users, car clubs, and essential visitors. All spaces will include electric vehicle charging points.

Site Accessibility

- 16.24 The existing access points around the application site include access from Empress Place, the Lillie Road bus layover, and Beaumont Avenue. Currently there is no permeability through the application site.
- 16.25 The proposed access and movement parameter plan sets out the proposed locations of accesses for pedestrians, cyclists, vehicles, and buses around the perimeter of the site. The proposed development would prioritise active travel reduce car dominance and proposes a pedestrian priority public realm.
- 16.26 Vehicular routes would be limited to the periphery of the site, with a 'car-lite' approach proposed to minimising car parking and servicing movements with consolidation centres proposed to minimise the number of trips to/from the development.
- 16.27 The proposed development includes four primary access points, Lillie Road and Beaumont Avenue (within LBHF), and Old Brompton Road and Warwick Road (within RBKC). The internal movement strategy prioritises sustainable and low-impact transport. Vehicular access will be restricted within the central areas of the site to create a more pedestrian-friendly environment. Delivery routes will be consolidated, with final distribution within the site carried out by bicycle or on foot, supporting active travel and reducing traffic congestion and emissions.
- 16.28 Four key pedestrian access points are proposed at: Lillie Road at Empress Place, Old Brompton Road at West Brompton Station, Beaumont Avenue at North End Road and Warwick Road at the former entrance to the Earls Court Exhibition Centre.

- 16.29 Further 'secondary' pedestrian and cycle access points largely on the LBHF western side of the site are also proposed. These adjoin the West Kensington estate with access points proposed on Aisgill Avenue and Mund Street.
- 16.30 The proposed street network within the site has been designed to accommodate low volumes of vehicular traffic, with the vehicular access strategy proposing limiting access to servicing, emergency vehicles, blue badge parking and for those who need direct access to plot (such as the mobility impaired).
- 16.31 Access is 'reserved' at the outline stage. Mechanisms for interim and final access arrangements are proposed to cater for the construction movements and phased build out of the site. All new and altered accesses would be secured and delivered via a S278 agreement with the Council. Condition will be secured to ensure the design of access routes accord with Healthy Streets principles.

Car Parking

- 16.32 London Plan Policy T6, T6.1, T6.4 and T6.5 state that proposals should encourage the reduction in the need to travel, especially by car. The London Plan sets no maximum car parking standards, but notes that in PTAL 4-6 areas, on-site car parking should be limited to operational needs, parking for disabled people and the needs for servicing as necessary, whereas the Local Plan sets out that for developments in PTAL 4 areas, these should be delivered as car-free.
- 16.33 A "car-lite" approach is proposed, with parking limited to disabled persons, car club vehicles, and essential visitors. The proposed disabled persons parking meets the initial requirements of the London Plan policy with spaces equivalent to the 3% of the dwellings to be delivered from the outset. Provision for a further 7% of dwellings is proposed to be delivered through a Parking Design and Management Plan (PDMP) for each RMA. For the commercial elements of the scheme, disabled persons parking will be provided either on-plot or on-street.
- 16.34 The proposal includes car club provision for up to 25 spaces, and up to 35 visitor parking spaces across all phases of development. The car club spaces are proposed as a viable alternative to car ownership for residents and employees requiring occasional access to a vehicle. The visitor parking is intended for essential visitors such as tradespeople and carers. These spaces will be managed by the estate management company and may be converted to disabled parking if demand arises. Further details regarding the allocation and management of parking spaces will be set out in the Parking Design and Management Plan (PDMP) submitted with each Reserved Matters Application (RMA). In addition, details of an electric car club scheme for the site will be secured as part of the Car Club Strategy, to support sustainable travel and reduce reliance on private car ownership. Secured through a Section 106 obligation,
- 16.35 A maximum of 205 car parking spaces is projected across both boroughs (131 in LBHF and 74 in RBKC). The final number of car parking spaces for the outline

component will be determined at RMA stage when the residential unit mix and non-residential floorspace proposed by each RMA come forward for approval. A maximum cap of car parking spaces is proposed and is estimated based on the maximum floorspace and mix of land uses. The total car parking spaces provision for the outline component is for up to 177 spaces: 115 car parking spaces in LBHF and 62 spaces in RBKC.

16.36 The LBHF outline car parking spaces breakdown would consist of the following maximum quantum:

- Residential (Blue Badge): 62 spaces
- Non-residential: 15 spaces
- Others (Visitor): 23 spaces
- Other (Car Club): 15 spaces

16.37 For the detailed component, the LBHF application would provide 16 car parking spaces comprising: 15 residential spaces and 1 non-residential space. The breakdown for the residential spaces is provided in the table below.

Plot	Land Use	Quantum	Proposed Persons Provision	Disabled Car Parking Provision from Outset
WB04	Residential	278 homes	9 spaces	
WB05	Residential	178 homes	6 spaces	
Total		456 homes	15 spaces (3.3%)	

16.38 The car parking for the LBHF detailed component would be limited to disabled persons and car club spaces only. The Blue Badge bays for residents/tenants would be accessed from the Service Access Road (SAR), except for the bay serving WB05 community use that would be located on Aisgill Avenue. The three Car club spaces would be located within the SAR.

16.39 The RBKC detailed component would provide 12 car parking spaces. Seven disabled persons spaces would be accessed from Warwick Crescent via an independent access street on EC05's eastern boundary, five disabled persons spaces will be provided within the public realm on Warwick Crescent close to building entrances.

16.40 To encourage sustainable travel, and in accordance with Building Regulations Part S Electric Vehicle (EV) charge points will be provided for all on-site parking spaces. The details of the electric vehicle charging infrastructure will be secured by planning condition for each RMA.

On street Parking Controls

16.41 The roads surrounding the site are subject to parking restrictions. In most cases, parking is restricted for permit holders and covers the core daily time periods. A number of areas also adopt limits on the duration of stay.

16.42 To understand the level of existing local on-street parking and to provide a baseline, parking surveys were undertaken by the transport consultants between 04:45-09:00 and 10:00-13:00 on Wednesday 20th March 2024 and Thursday 21st March 2024. The time periods were chosen to capture the overnight period when residential parking would be at its highest as well as the daytime period when employment derived parking demand would be at its highest. The scope of the parking survey was discussed with the Transport Stakeholders prior to being undertaken.

16.43 The surveys identified that there is a total of 904 on-street car parking spaces in the area surveyed. The parking survey results were separated into a number of zones surrounding the site to enable analysis. These zones were formed of the following roads/links:

- Zone 1 – Beaumont Avenue, Barons Court Road.
- Zone 2 – Beaumont Crescent, Gibbs Green Close, Castletown Road and Langfey Place.
- Zone 3 – Mund Street, Aisgill Avenue, Ivatt Place, Stanier Close, Bellamy Close, Chesson Road and Thaxton Road.
- Zone 4 – Empress Place and Seagrave Road.
- Zone 5 – Eardley Cresnet, Kempsford Gardens, Penywern Road and Earls Court Square.
- Zone 6 – Philbeach Gardens, Longridge Road and Trebovir Road

16.44 The table below provides a summary of the maximum parking stress for each zone.

Table 13: Maximum Parking Stress (Excluding double yellow lines and red route)				
Survey Day	Wednesday		Thursday	
Zone	Time	Parking Stress	Time	Parking Stress
1	12:00 - 13:00	92%	13:00 - 14:00	87%
2	04:45 - 05:45	63%	04:45 - 05:45	48%
3	06:00 - 07:00	30%	04:45 - 05:45	33%
4	11:00 - 13:00	56%	08:00 - 10:00	56%
5	04:45 - 05:45	74%	06:00 - 07:00	68%
6	06:00 - 07:00	71%	04:45 - 05:45	77%

16.45 The on-street surveys showed, at no point during the survey period were all spaces occupied. Occupancy levels across all surveyed times on the Wednesday varied between 30-92%. On the Thursday survey day, occupancy across all surveyed times varied between 33-87%.

- 16.46 To prevent parking stress in the surrounding area, a restriction will be secured through a Section 106 obligation preventing future occupiers of the development from applying for resident or visitor parking permits on nearby streets. This measure is intended to support sustainable travel choices and protect the integrity of existing Controlled Parking Zones.
- 11.47 In addition, to further mitigate potential parking impacts within the vicinity of the site, a CPZ Review obligation has been secured to ensure ongoing monitoring and review of parking restrictions in the surrounding zones to ensure they remain appropriate and effective in the context of the proposed development.

Cycle parking

- 16.48 London Plan Policy T5 (including the London Cycling Design Standards) and Local Plan Policy T2 seeks to develop and promote a safe environment for cyclists across the borough to encourage future residents and businesses to consider these modes. Local Plan Policy T3 seeks to increase and promote opportunities for cycling through the provision of convenient, accessible, safe and secure cycle parking within the boundary of the site. Appendix 8 of the Local Plan seeks to ensure that satisfactory cycle parking is provided for all developments.
- 16.49 The proposed cycle parking provision within the application site is designed to support the development's car-lite, active travel-focused transport strategy. The development proposes a total of 11,203 cycle parking spaces across the site at full build-out. This provision is intended to meet and exceed the requirements set out in the London Plan (2021), specifically Policy T5, which mandates high-quality, secure, and accessible cycle parking for all new developments.
- 16.50 Cycle parking is distributed across the site in both long-stay and short-stay formats, tailored to the needs of different land uses. Long-stay cycle parking is provided within lower ground or ground-level secure enclosures. Short-stay visitor parking is located near building entrances and public realm areas. In addition to traditional cycle parking, the development includes provision for micromobility hubs, which will accommodate e-bikes, cargo bikes, and e-scooters. These hubs are strategically located to support last-mile connectivity and reduce reliance on private vehicles.
- 16.51 Cycle parking for the detailed and outline components would be provided in accordance with the Minimum Cycle Parking Standards set out in the London Plan (2021).
- 16.52 As per the car parking requirements, the final cycle space numbers required for the outline element will be determined at the RMA stage, when the final residential unit mix and non-residential floorspace proposed by each RMA comes forward for approval. However, based on the outline submission, set around the maximum parameters and controls on the maximum floorspace per land use, a maximum number of cycle spaces required for both the outline and detailed components has been calculated. LBHF require a total of 7,338 cycle spaces. This would comprise of 6,864 long stay and 474 short stay cycle

spaces. Linked with the provision required in RBKC, the overall provision would increase to 10,386 long stay and 817 short stay spaces (11,203 cycle spaces in total).

16.53 For the residential component within LBHF, a total of 4,608 residential cycle spaces is required, comprising 4,544 long stay and 64 short stay cycle spaces. Combined with the provision required by RBKC, the overall total for the residential uses will increase to 7,095 long stay and 102 short stay cycle spaces (7,197 spaces in total).

16.54 Taking the Detailed Component in isolation, the proposal would comprise a total of 1,342 long stay and 180 short stay cycle spaces (total 1,527 cycle spaces). The breakdown of cycle parking/land uses proposed for the Detailed Component is as follows:

Land Use (Use Class)	Cycle Parking Long Stay	Cycle Parking Short Stay	Cycle Parking Total (Land Use)
Residential (C3)	805	14	819
Student (Sui Generis)	522	18	540
Leisure (F2)	4	21	25
Flexible Retail/F&B/Commercial (E(a) / (b) / (c)	14	114	128
Community /Social (F/E2 (g))		13	15
TOTAL	1,347	180	1,527

16.55 The cycle parking for each phase and building within the proposal will meet the minimum standards set out in the London Plan Policy T5, noting that part F requires that where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard will be applied. The cycle parking for the outline elements of the application will be secured as RMAs come forward to ensure the provision will accord with London Cycle Design Standards (or the prevailing standards) in accordance with London Plan policy T5B.

16.56 Cycle parking facilities will be designed in accordance with the London Cycle Design Standards (LCDS), ensuring:

- step-free access
- adequate spacing between stands
- Weather protection for long-stay parking
- Lighting and CCTV for security

- Wayfinding signage.
- 16.57 The development also includes cycle maintenance stations and charging points for electric bikes, supporting the shift toward low-emission personal transport. The details of these facilities will be secured by condition for each RMA.
- 16.58 The proposals include space within the public realm for 'micro-mobility modes' such as dockless e-bikes and e-scooters. Land will be safeguarded for this, with flexibility for the space to be used for this or other active travel measures, as RMAs come forward. Space within the public realm has also been allocated to accommodate three Cycle stations with land and funding for the delivery secured through S106 obligation, in line with London Plan policies T1 and T4.
- 16.59 Cycle parking will be provided at ground level in Plots WB03 and WB04, and at ground and mezzanine level in Plot WB05. Access to all buildings within the LBHF detailed Component for pedestrians and cyclists is provided at-grade, either via the Empress Place Boulevard or Aisgill Gardens via separate entrance lobbies for each building/ land use.
- 16.60 The entrance into the residential cycle store will require a fob to access. Within the bike stores there will be communal facilities which will include a bike pump and repair tools. LCDS states that cycle parking needs to take into account all user needs, so as not to exclude or disadvantage riders of certain types of cycle, which includes people who use accessible cycles.
- 16.61 There is no specific requirement for electric cycle charging set out in the LBHF, or London Plan policies. However, given the growth of sales for these bikes, and the opportunity to present an enhanced cycle strategy, the current European Cyclist Federation recommends equipping 10% of bays with e-bike charging infrastructure. As set out above, this is based on a mix of fixed and removable batteries, with removable batteries likely to be charged in the cyclist's home. It is therefore proposed to allow for 10% of long-stay cycle parking spaces with charging provision that will take the form of plug-in points on the walls.
- 16.62 Short stay cycle parking provision for the detailed component will be located within the public realm and secured by condition

Cycling Infrastructure

- 16.63 London Plan Policy T5 requires development proposals to help remove barriers to cycling. The location and proposed layout of the site offers opportunities for potential cycling improvements within the wider area, with the potential of opening up of connections through the site and the opportunity to deliver links to the existing surrounding cycle network.
- 16.64 The existing cycling infrastructure around Earls Court is fragmented. The proposed development provides an opportunity to create a coherent, safe, and inclusive cycling network in this part of the borough. Through a combination of on-site routes, off-site upgrades, and supportive facilities, the scheme has the

potential to make cycling a viable and attractive option for thousands of residents, workers, and visitors.

- 16.65 To the south of the site, Old Brompton Road serves as a key east-west corridor. It currently features advisory cycle lanes, but these are narrow, unprotected, and often interrupted by parked vehicles or turning traffic.
- 16.66 Warwick Road, which forms the eastern boundary of the site, is part of the Transport for London Road Network (TLRN) and carries significant volumes of traffic. It lacks any dedicated cycling infrastructure and is widely perceived as hostile to cyclists.
- 16.67 To the west, North End Road is a busy local high street with high pedestrian activity and frequent loading activity. It does not currently support cycling in a meaningful way, and its narrow carriageway and cluttered pavements make it difficult to retrofit infrastructure without significant redesign.
- 16.68 West Cromwell Road (A4) acts as a major barrier to northbound cycling. It is a fast-moving, multi-lane road with no cycle lanes and limited crossing points. Cyclists seeking to travel north toward Kensington High Street or Hyde Park must navigate a series of indirect routes.
- 16.69 Quietway 15, which runs through West Kensington, offers a lower-traffic route toward Hammersmith and Fulham. However, connectivity to this route from the Earls Court site is poor, and wayfinding is limited.
- 16.70 Recognising these shortcomings, the Applicant proposes a significant upgrade to cycling infrastructure both within and beyond the site. The masterplan includes the creation of new, dedicated cycle routes that will run north-south and east-west across the site, providing direct, safe, and legible connections between Warwick Road, Old Brompton Road, and the three adjacent Underground stations. These routes will be segregated from both vehicular traffic and pedestrian flows, designed in accordance with the London Cycle Design Standards (LCDS), and integrated into the public realm with clear signage, lighting, and landscaping.
- 16.71 In addition to these on-site routes, the development commits to improving connections to the wider network. This includes the introduction of a segregated cycle lane along Warwick Road, which would represent a major step forward in making this corridor safe and accessible for cyclists. While this proposal has generated some concern due to existing congestion, it is a critical intervention if the development is to support its target of 30% mode share for walking and cycling.
- 16.72 Old Brompton Road will also be upgraded, with enhancements to the existing advisory lanes, improved junction treatments, and better surface quality. These changes will help create a more continuous and coherent east-west route through the area.

- 16.73 The development proposes to improve links to Quietway 15 and other local routes through wayfinding, signage, and surface upgrades. Junctions such as Warwick Road/Old Brompton Road and Lillie Road/North End Road will be redesigned to include cycle-friendly signal phasing, advanced stop lines, and protected turning movements.
- 16.74 The proposed upgrades to the wider cycle network will be subject to further refinement of design, with delivery secured via S278 agreements at the relevant point in the development build out, which will help ensure safe, accessible, and high-quality routes for cycling.
- 16.75 Beyond cycle route infrastructure, the development will support cycling through the provision of cycle parking spaces, including secure long-stay facilities for residents and employees, short-stay racks for visitors, and micromobility hubs for e-bikes, cargo bikes, and scooters. These facilities will be distributed across the site and integrated into the public realm, ensuring that cycling is not only possible but convenient and attractive.
- 16.76 In policy terms, the cycling proposals align with the London Plan's Policy T5, which requires developments to support cycling through infrastructure, parking, and design. They also reflect the Mayor's Healthy Streets Approach commitments to active travel set out in the Local Plan.

Walking

- 16.77 The application site is surrounded by a mix of residential streets, local corridors and strategic routes. The pedestrian environment reflects this diversity, offering a range of walking routes that vary in character.
- 16.78 To the east, Warwick Road forms a significant boundary. It is a key route for pedestrians accessing the site from the east and northeast. It is a wide, vehicle-dominated corridor that connects to West Cromwell Road and the A4. While it provides access to Earls Court Station and several bus routes, pedestrian movement along and across Warwick Road are constrained by traffic volumes and junction complexity.
- 16.79 Old Brompton Road, running along the southern edge of the site, is a more traditional high street environment. It supports a mix of shops, cafes, and residential buildings, and is frequently used by pedestrians travelling between West Brompton Station and the surrounding neighbourhoods. The footways here are generally continuous, and the street benefits from active frontages, though crossing points are limited.
- 16.80 To the west, North End Road and Lillie Road serve as busy local corridors with strong pedestrian activity, particularly around retail and market areas. These streets connect the site to Fulham and West Kensington and are important for local access, school journeys, and connections to bus services.
- 16.81 Within the broader area, quieter residential streets such as Kempsford Gardens, Beaumont Avenue, Mund Street and Aisgill Avenue offer alternative

walking routes. These streets are less trafficked and provide a more relaxed pedestrian experience, though they are not always well-integrated into the wider pedestrian network.

- 16.82 The site is also within walking distance of three Underground stations: Earls Court, West Brompton, and West Kensington which are key anchors for pedestrian movement. Each station is accessible on foot, though the approaches vary in legibility and comfort.
- 16.83 Overall, the pedestrian environment around the site is functional and well-used but fragmented in places. The development presents an opportunity to strengthen these connections, improve wayfinding, and create a more coherent and inclusive walking network that links the site to its surrounding context.
- 16.84 Prioritising public realm improvements and pedestrian connectivity are a key central objective of the proposed development. The proposed development introducing a network of new pedestrian corridors that will run east-west and north-south across the application site. These routes are designed to be fully accessible, with level surfaces, dropped kerbs, and tactile paving. They will be linked to the three Underground stations and provide direct access to new public spaces such as Aisgill Gardens, Exhibition Gardens, Lillie Sidings and the Table Park.
- 16.85 The proposed public realm and connections within the site are in Outline but the nine key internal routes (in their indicative form) have been assessed against the Healthy Streets indicators and generally the routes perform well. Pedestrian routes within the site are designed to meet or exceed the standards set out in the London Plan, and the Mayors Healthy Streets indicators.
- 16.86 To ensure the delivery of high-quality and accessible walking connections within the site, conditions requiring compliance with Healthy Streets principles will be secured for each Reserved Matters Application (RMA). These conditions will be required to be cross-referenced with the standards set out in the site-wide Design Code to ensure that the internal movement strategy aligns with these objectives as the development is built out.
- 16.87 Off-site, the development commits to upgrading the pedestrian environment in the vicinity of the site. The improvements include (but are not limited to) upgrades to the footways on Lillie Road, North End Road, and Old Brompton Road. This includes widening pavements, resurfacing, and improving lighting and signage. Key junctions will be redesigned to include pedestrian phases at traffic signals, refuge islands, and improved visibility. These interventions aim to reduce severance and make walking a safer and more attractive option. All interventions will be subject to further refinement of design, with delivery secured via S278 agreements at the relevant point in the development build out.
- 16.88 In policy terms, the pedestrian priority approach aligns with the London Plan Policy T2, which promotes walking and the Healthy Streets approach, as well

as the Mayors Transport Strategy, which sets a target for 80% of trips in London to be made by walking, cycling, or public transport by 2041.

Active Travel Zone assessment

- 16.89 London Plan Policy T2 embeds the concept of Healthy Streets (HS) and highlights the need for developments to deliver high quality and accessible walking and cycling connections within the site and beyond to key destinations.
- 16.90 As part of the wider transport strategy for the Earls Court Development, an Active Travel Zone (ATZ) assessment was carried out to evaluate the quality, safety, and connectivity of walking and cycling routes within the surrounding area. The ATZ methodology, developed by Transport for London (TfL), is designed to assess the conditions for active travel within a 20-minute cycling radius and a 10-minute walking catchment from a development site. It is particularly useful for identifying barriers to movement, opportunities for improvement, and the overall suitability of the local environment for encouraging modal shift away from private vehicles.
- 16.91 The assessment focused on 26 key routes radiating from the site, covering connections to nearby Underground stations, local schools, parks, retail centres, and residential neighbourhoods. These routes were selected based on anticipated desire lines paths that future residents, workers, and visitors are likely to use for everyday journeys. The analysis considered a range of factors including footway width and condition, lighting, crossing facilities, signage, traffic volumes, and the presence of cycle infrastructure.
- 16.92 The ATZ assessment site visits were undertaken during both daylight and the hours of darkness on 26 routes external to the site. The routes were evaluated to understand the quality and connectivity of walking and cycling infrastructure within a 20-minute catchment of the site.
- 16.93 These routes were selected based on their strategic importance, their proximity to key destinations, and their likelihood of being used by future residents, workers, and visitors. Together, they form a web of connections that link the site to nearby transport hubs, schools, parks, retail centres, and residential neighbourhoods.
- 16.94 Some of the most prominent routes include those leading to the three Underground stations that frame the site: Earls Court, West Brompton, and West Kensington. These corridors via Warwick Road, Old Brompton Road, and North End Road are essential for public transport access and are expected to carry significant volumes of pedestrian and cycle traffic. The assessment found that while these routes are direct, they often suffer from poor crossing facilities, inconsistent cycle infrastructure, and limited space for pedestrians.
- 16.95 Other routes, such as those along Lillie Road and North End Road, serve as important east-west connectors. These streets are busy and vibrant, with a mix of retail and residential uses, but they also present challenges in terms of footway width, surface quality, and interaction with vehicular traffic.

Improvements along these corridors are considered essential to support safe and comfortable movement.

- 16.96 The assessment included quieter residential streets like Kempsford Gardens, Beaumont Avenue, and Aisgill Avenue. These routes offer alternative paths into and out of the site, and while they are less trafficked, they play a vital role in local connectivity. Their inclusion in the ATZ reflects a commitment to ensuring that active travel is supported not just on main roads but throughout the wider neighbourhood.
- 16.97 Several routes were assessed for their connection to community and leisure destinations, including Normand Park, Brompton Cemetery, and Fulham Broadway. These routes are important for non-work trips and contribute to the overall walkability and liveability of the area.
- 16.98 The ATZ also considered future connections, such as potential links via Cluny Mews and Fenelon Place, which could enhance permeability if access agreements are reached. These routes are currently constrained but represent opportunities for long-term improvement.
- 16.99 Each of the 26 routes was evaluated against criteria such as footway condition, lighting, safety, signage, and cycle provision. The findings informed the design of new infrastructure within the development and shaped the off-site mitigation strategy. For example, the need for upgraded crossings at Warwick Road and Old Brompton Road was identified as a priority, as was the enhancement of cycle links to Quietway 15 and other local routes.
- 16.100 One of the key findings of the ATZ assessment was that while the area benefits from a relatively dense street network and good proximity to amenities, the quality and consistency of the infrastructure for walking and cycling varies significantly. For example, routes along Warwick Road and Old Brompton Road were identified as critical corridors but were found to be lacking in safe crossing points and continuous cycle lanes. Similarly, Lillie Road and North End Road, which serve as important east-west connectors, were noted for their high pedestrian activity but constrained footways and limited provision for cyclists. Recommendations include enhancing crossings, widening footways, improving lighting, and addressing accessibility barriers.
- 16.101 The assessment also highlighted areas where the pedestrian environment could be improved to support inclusivity and safety. Streets such as Mund Street and Beaumont Avenue were flagged for poor lighting and limited passive surveillance, raising concerns particularly for women and girls walking alone. These findings were reinforced by a separate Safety Inclusion Assessment, which informed the design response and mitigation strategy.
- 16.102 In response to the ATZ findings, the development proposes a series of targeted interventions both within and beyond the site boundary. These include upgrading footways, crossings, and cycle infrastructure on priority routes identified in the ATZ. These improvements will be delivered in coordination with the boroughs and TfL and will be secured through Section 106 obligations.

Safety Inclusion Assessment

- 16.103 A Safety Inclusion Assessment (SIA) was undertaken, focusing on the needs of vulnerable users. Inclusivity is a central principle in the design of the development, embedded not only in the transport strategy but also in the wider public realm framework. The masterplan adopts a people-first approach, which places inclusive movement and equitable access at the heart of the site.
- 16.104 The assessment ensures that movement corridors are not only functional but also safe, legible, and comfortable for all users. The Design Code and Design & Access Statement submitted with the application also discuss how inclusive and accessible routes will be provided through the site. This is particularly important given the significant level differences at 'The Table' (the deck over the railway). It is proposed that 'The Cascades' form a terraced landscape to deal with the level changes in a gradual way; lifts are also proposed to assist those with mobility impairments. The Design Code principles focus on a pedestrian first environment, seeking to limit vehicles entering the site and highlighting personal safety, lighting, wayfinding as priorities. This supports the strategic policies and objectives in the London Plan and Mayor's Transport Strategy.
- 16.105 The site layout has been carefully planned to ensure that all key destinations residential buildings, cultural venues, retail areas, green spaces, and transport hubs are reachable via routes that are fully accessible to disabled people, older adults, and those with mobility impairments. This includes the provision of level surfaces throughout the public realm, the use of tactile paving at crossings and junctions, and the integration of dropped kerbs and step-free access points at all entrances and gateways.
- 16.106 The SIA highlighted areas where the pedestrian environment could be improved to support inclusivity and address concerns around personal safety in the surrounding pedestrian network. This includes quieter streets such as Mund Street and Beaumont Avenue, where improved visibility and passive surveillance will help foster a greater sense of security, particularly for women and girls.
- 16.107 The development proposes targeted improvements, including better lighting, passive surveillance, and public realm enhancements that foster a greater sense of safety and comfort. The measures to address these concerns including improvements to lighting and the provision of CCTV will be secured through S106 obligations.
- 16.108 In policy terms, these proposals align with the London Plan's Policy T2, which promotes walking and the Healthy Streets approach, as well as the Mayors Transport Strategy, which sets a target for 80% of trips in London to be made by walking, cycling, or public transport by 2041. Locally, LBHF supports pedestrian-first development through the Local Plan.

Pedestrian Comfort Level (PCL)

- 16.109 A Pedestrian Comfort Level (PCL) analysis was undertaken as part of the Transport Assessment (TA) focusing on key pedestrian corridors expected to experience increased demand from the proposed development. These locations include Lillie Road, Old Brompton Road / Eardley Crescent, and Warwick Road / Empress Place.
- 16.110 Pedestrian survey data from 2022 was used to inform the analysis, with peak hour and average flow values derived from six-hour survey periods. The assessment primarily used existing geometries, with updates applied to Lillie Road to reflect proposed footway widening.
- 16.111 The Lillie Road surveys indicated the Southern footways near West Brompton Station currently experience Very / Extremely Uncomfortable PCLs due to high pedestrian volumes and constrained widths. The northern footways generally perform better, though pinch points such as on the bridge showed inadequate capacity under the 2041 Base Minus scenario. The early Phases scenario demonstrates improved PCLs due to proposed public realm enhancements.
- 16.112 The Old Brompton Road / Eardley Crescent location operate acceptably across scenarios. However, areas show persistent Very / Extremely Uncomfortable PCLs due to existing constraints such as street furniture and bus stops. These were considered existing issues not attributable to the proposed Development; this location has been identified for further review through future RMA applications.
- 16.113 The Warwick Road / Empress Place (Warwick Apron) footways and crossings generally operate within acceptable PCL thresholds. There are areas which show a worsening PCL level C under the 2041 Early Phases scenario, placing it on the “At Risk” threshold for Transport Interchanges. This location has been identified for further review and potential mitigation through future public realm improvements.
- 16.114 Overall, while several locations show constrained pedestrian comfort levels, many of these are existing conditions. The proposed development includes a package of mitigation measures to improve pedestrian conditions, particularly where demand is forecast to increase.

Modelling

- 16.115 The Transport Assessment (TA) used the Transport for London’s MoTiON model to estimate trip generation and mode share for the development. MoTiON is considered a robust strategic tool designed to simulate travel behaviour across Greater London, integrating demand modelling with assignment tools such as Railplan for public transport, LoHAM for highways, and Cynemon for cycling. These models collectively allow for a comprehensive assessment of congestion, crowding, and journey times across different modes.

16.116 The MoTiON (Model of Travel in London) is Transport for London's strategic multi-modal transport demand model. It is designed to simulate travel behaviour across Greater London and surrounding areas and is used to assess the impact of major developments and infrastructure schemes. MoTiON estimates:

- The number of trips generated by a development
- The origins and destinations of those trips
- The mode of transport used (e.g. walk, cycle, bus, rail, car)
- The time of day when trips occur

16.117 It does this by applying behavioural algorithms to a synthetic population, calibrated using real-world data such as the London Travel Demand Survey (LTDS), Census data, and observed transport flows.

16.118 Integrated Assignment Models MoTiON is linked to several assignment models that simulate how trips are distributed across the transport network:

- Railplan – Assigns trips to public transport services (Underground, Overground, National Rail, bus)
- LoHAM (London Highway Assignment Model) – Assigns trips to the road network, including private vehicles, taxis, and freight
- Cynemon – Assigns trips to the cycle network

16.119 These models allow MoTiON to assess congestion, crowding, and journey times across different modes. MoTiON was used to estimate trip generation for both Early and All Phases scenarios, determine mode share (e.g. 60% public transport, 30% active travel, 10% vehicle), identify peak hour demand at nearby stations (Earls Court, West Brompton, West Kensington) and assess impacts on bus services and road junctions.

16.120 The model outputs were refined using local data and adjusted to reflect the site's car-lite strategy and provision for micromobility. Adjustments included reductions in car trip estimates to reflect low parking provision, manual additions for servicing trips, and recalibrations for taxi and private hire usage based on observed trends.

16.121 The projected mode share was assumed to be 60% public transport, 30% active travel, and 10% vehicular whilst ambitious it aligns with policy objectives. It assumes a significant behavioural shift but faces challenges, such as the availability of safe and continuous cycle routes, station capacity constraints, and the impact of construction phasing on access.

16.122 The strategic modelling was undertaken in collaboration with TfL's modelling team and a third-party auditor, using the Planning Forecast as the background growth scenario. This high-demand future provides reassurance that the modelling is sufficiently robust to accommodate a range of outcomes. Local validation was also carried out to ensure the base models accurately reflect conditions in the vicinity of the site. Bespoke adjustments were made to model zones and network connections to allow for detailed scenario testing, including 2031 and 2041 conditions with and without the development.

16.123 In the absence of a detailed growth scenario for the outline planning application, a Maximum Development Parameters approach was adopted to define the scale and composition of the modelled scenarios. Should the final number of homes or jobs exceed the thresholds used in the modelling, further strategic analysis will be required with each future RMA application.

Trip Generation

16.124 The Trip Generation provides a detailed forecast of the number of journeys expected to be generated by the proposed land uses, broken down by mode and time of day. The assessment considers two development scenarios: the Early Phases, representing completion of Phases 1–4 by 2037 with the Lillie Bridge Depot (LBD) remaining operational, and the All Phases, representing a full build-out by 2043 and including redevelopment of the LBD.

16.125 The methodology combines strategic modelling using TfL's MoTiON model and associated assignment tools (Railplan and LoHAM), with bespoke trip rate calculations based on Gross Internal Area (GIA), land use type, and expected occupancy. This hybrid approach ensures that both strategic travel behaviour and site-specific characteristics such as the car-lite strategy and emphasis on active travel are accurately captured.

16.126 In the Early Phases, the development is expected to generate approximately 3,904 trips during the AM peak hour and 3,224 during the PM peak hour. By the All Phases and completion of the development, this increases to 6,149 AM peak trips and 5,133 PM peak trips.

16.127 These trips are distributed across a range of modes, with public transport accounting for the majority. In the All Phases AM peak, approximately 1,781 trips are expected by Underground, 1,078 by National Rail, 828 by bus, 942 by bicycle, and 1,215 on foot. Only 46 trips are forecast by private car, reflecting the sites limited parking provision and strong public transport accessibility.

16.128 The assessment considers two key scenarios: the Early Phases, representing the initial stages of development, and the All Phases, reflecting full build-out by 2043.

Peak Hour Trip Generation		
Scenario	AM Peak Trips	PM Peak Trips
Early Phases	6,351	4,700
All Phases	8,843	7,026

16.129 These figures reflect total person trips across all modes, derived from strategic modelling using TfL's MoTiON, Railplan, and LoHAM models, supplemented by bespoke calculations based on land use, floor area, and expected occupancy.

16.130 The development targets a mode share of:

- 60% Public Transport
- 30% Walking and Cycling
- 10% Vehicle (including private car, taxi, and servicing)

16.131 These assumptions are aligned with London Plan policies and reflect the site's car-lite strategy, excellent public transport accessibility, and emphasis on active travel. The trip generation provides a forecast of how many journeys will be made to and from the site once occupied, and how these journeys will be distributed across different modes of transport. The assessment considers two key scenarios: the Early Phases, representing the initial stages of development, and the All Phases, reflecting full build-out by 2043.

16.132 Residential uses are the largest contributor to trip generation. In the Early Phases, the site will accommodate approximately 1,670 homes and 550 student rooms, increasing to 2,325 homes and 1,641 student rooms by the All Phases. These dwellings generate significant trip volumes, particularly during peak hours, as residents travel to work, education, and other destinations. Most residential trips are expected to be made by public transport, with walking and cycling also playing a prominent role due to the site's proximity to key amenities and transport hubs. Car use is minimal, consistent with the site's limited parking provision.

16.133 Commercial and employment uses also contribute substantially to trip generation. The development includes office and research space, totalling around 168,000 square metres of GIA in the Early Phases and nearly 270,000 square metres in the All Phases. These uses generate commuter trips primarily during weekday peak hours, with employees expected to rely on public transport, walking, and cycling. The site's adjacency to three Underground stations and multiple bus routes supports this modal split, while car use remains low due to restricted parking.

16.134 Retail, food and beverage, and cultural uses generate trips throughout the day and into the evening. These trips are more varied in nature, attracting both employees and visitors. Walking and cycling are expected to dominate for local users, while public transport will serve those travelling from further afield. Taxi and private hire vehicles may be used for evening events or by those with mobility needs, and the development includes dedicated pick-up and drop-off areas to accommodate these modes.

16.135 Education and social infrastructure also play a role in trip generation. The site includes a private school with 400 pupils and a nursery with 140 places, generating trips during morning and afternoon peaks. These are expected to be made primarily by walking, cycling, and short-distance public transport, with some car use managed through designated access points and parking controls. Healthcare facilities such as GP surgeries and dental practices contribute additional trips, typically spread throughout the day and served by a mix of active and public transport modes.

- 16.136 In addition to weekday trip generation, the Transport Assessment considers the potential for weekend travel demand, particularly in relation to leisure, retail, and cultural uses. While TfL's MoTiON model does not provide weekend demand forecasts, an indicative weekend profile was developed using alternative data sources, including expanded TRICS selection criteria and adjusted assumptions.
- 16.137 The weekend trip generation exercise applied a first principles approach, consistent with the weekday methodology, and assumed an internalisation rate of 8% per hour. The resulting profile suggests a peak hour between 12:00 and 13:00, with approximately 3,307 two-way person trips across all land uses. This is significantly lower than the weekday peak (6,245 two-way trips), indicating that weekend demand, while notable, is unlikely to exceed weekday impacts.
- 16.138 Consideration of the site's role as a destination, particularly at weekends when cultural and leisure-based trips may increase. A sensitivity test was undertaken, reducing the internalisation assumption for retail and food & beverage trips from 80% to 50%. This resulted in a higher peak hour of 4,122 two-way trips between 13:00 and 14:00. While this represents an increase of approximately 800 trips compared to the base weekend scenario, it remains below the weekday peak hour volumes and is not considered to warrant further modelling or mitigation at this stage.

Servicing and Delivery Trips

- 16.139 Servicing and delivery trips have been modelled separately to account for operational activity. These trips are expected to be consolidated and managed through site-wide logistics strategies, with final distribution within the site undertaken by bike or on foot.
- 16.140 Peak hour impacts from servicing trips have been assessed and are considered manageable with the proposed mitigation measures, including designated access points and delivery management protocols.

Scenario	Daily Servicing Trips
Early Phases	754
All Phases	1,276

- 16.141 In addition to person trips, the development will generate a substantial number of servicing and delivery movements, including deliveries to residential and commercial units, waste collection, and logistics operations. These trips are made by a mix of cargo bikes, vans, and rigid trucks. The TA estimates that the Early Phases will generate around 750 servicing trips per day, increasing to over 1,270 in the All Phases. Peak hour impacts have been modelled and are considered manageable, supported by the inclusion of dedicated servicing bays and logistics hubs designed to consolidate movements, reduce emissions, and minimise disruption to the public realm.

- 16.142 These servicing strategies form part of a wider commitment to sustainable operations and efficient site management, ensuring that the development supports both functional needs and broader transport and environmental objectives.
- 16.143 The TA included assumptions around trip consolidation, reflecting modern logistics practices and the evolution of delivery patterns over the past decade. However, following stakeholder feedback, all internalisation assumptions were removed to present a more conservative, worst-case scenario.
- 16.144 Based on the worst case scenario (without consolidation) the daily servicing trips are estimated at 754 for the Early Phases and 1,276 for the All Phases. These figures include all delivery and servicing activity across residential, commercial, retail, and social infrastructure uses.
- 16.145 Peak hour impacts were modelled based on the assumption that 15% of servicing trips occur during peak periods. While this approach may overstate demand in some cases, it ensures robustness in planning and mitigation.
- 16.146 Servicing and delivery trips, while not modelled in detail by MoTiON, have been manually added to the assessment to ensure a realistic representation of operational activity. These trips are expected to be consolidated and managed through site-wide logistics strategies, with final distribution within the site undertaken by bike or on foot.

Public Transport - London Underground / Overground

- 16.147 London Plan Policy T3 requires development proposals to support transport capacity, connectivity and other improvements to public transport to ensure it can operate efficiently to, from and within developments and supporting infrastructure as needed.
- 16.148 In line with this policy, the Transport Assessment (TA) for the Development identifies a significant reliance on three key stations within the vicinity of the site Earls Court, West Brompton, and West Kensington.
- 16.149 While current modelling indicates that these stations operate within capacity, the cumulative impact of the proposed development particularly during peak hours raises concerns about potential overcrowding and reduced service quality. The TA acknowledges this risk but does not yet include firm commitments or funding mechanisms to address it. Engagement with Transport for London (TfL) is ongoing, but further action is required to ensure the development supports necessary upgrades. These may include platform widening, ticket hall enhancements, improved wayfinding, and step-free access improvements to accommodate increased demand and enhance accessibility.
- 16.150 To address these concerns a Section 106 obligation will be secured to contribute towards station capacity improvements. In addition, the applicant will fund a detailed Station Access Strategy, developed in collaboration with TfL, to

identify and prioritise interventions that support safe, efficient, and inclusive access to public transport facilities.

- 16.151 Railplan modelling was undertaken to compare demand between the 2041 Early Phases and the 2041 Base Minus scenarios. This analysis focused on key station access points at West Brompton Station and the Warwick Road entrance to Earls Court Station, reflecting the anticipated concentration of pedestrian activity in these areas due to the site's access strategy.
- 16.152 The Early Phases scenario assumes limited connectivity to West Kensington, which results in a greater reliance on West Brompton and Earls Court stations for both arrivals and departures.
- 16.153 These Railplan outputs were used to inform the uplift applied to baseline (2022) pedestrian flows, which then fed into the Pedestrian Comfort Level (PCL) analysis. The results confirm that both stations will experience substantial pedestrian activity during peak periods under the Early Phases scenario. This is consistent with the development's modal strategy and the spatial distribution of access points.
- 16.154 The methodology and outputs assessing the impact of the Development on LU and LO train capacity have been largely agreed with TfL officers. While some minor refinements are anticipated, these are expected to result in lower crowding levels than initially forecast, reinforcing the robustness of the assessment.
- 16.155 The most notable impact identified is overcrowding on northbound District Line services departing West Brompton Station in 2041. This issue appears to be influenced by the station layout, and TfL has recommended mitigation measures such as improved signage and platform canopies to encourage passengers to spread along the full length of the platform, thereby easing congestion.
- 16.156 The results for the 2041 Early Phases scenario are very similar to those for the 2041 All Phases scenario, indicating that the Early Phases do not introduce additional pressure beyond what has already been assessed.
- 16.157 To understand station-level impacts, Legion micro-simulation models were run for Earls Court and West Brompton Stations using demand forecasts for the 2041 Early Phases scenario. At Earls Court Station, where no mitigation is proposed, the existing layout was tested. The results show Level of Service (LoS) ranging from B to E across various station elements during peak periods. Notably, LoS D/E was observed at the top of the stairs to the Piccadilly Line mezzanine level and on Platform 4 (District Line westbound), indicating moderate crowding. However, these results are consistent with those from the All-Phases scenario and do not warrant further intervention.
- 16.158 At West Brompton Station, the Early Phases scenario was tested using the proposed mitigation layout, which includes the closure of the side entrance. The modelling shows LoS C/D at the gate line and LoS D/E on the stairs and

platforms during both AM and PM peaks. These results mirror those from the All-Phases scenario, confirming that the Early Phases do not materially worsen conditions. The mitigation measures already proposed remain appropriate.

- 16.159 The modelling concluded the impacts of the 2041 Early Phases on LU and LO services and station operations are not materially different from those assessed for the full build-out. The strategic modelling and station simulations confirm that the proposed mitigation measures are sufficient, and no further adjustments are required at this stage
- 16.160 Initial static analysis of gate line capacity at Earls Court, West Brompton, and West Kensington stations was undertaken, the modelling assessed the performance of station infrastructure including ticket halls, gate lines, staircases, escalators, and platforms under the 2031 and 2041 development scenarios.
- 16.161 At Earls Court, the Legion modelling shows that both the 2031 and 2041 development scenarios have a limited impact on station operations. Given the station's existing constraints, heritage status, and operational importance, TfL has confirmed that no mitigation is required at this location.
- 16.162 In contrast, significant interventions are required at West Brompton Station to accommodate the development-related demand in both 2031 and 2041. While congestion is already evident in the baseline scenario, TfL has raised concerns about the TA's presentation of this issue. The development is expected to exacerbate existing congestion, potentially rendering the station inoperable due to safety concerns and negatively affecting both existing users and future occupiers.
- 16.163 TfL requires the developer to fully fund and deliver a London Underground-compliant design that accommodates the additional demand generated by the development not merely restores conditions to baseline levels. A proposed design has been submitted, including the reconfiguration of the ticket hall, a new overbridge and stairs and a lift providing step-free access (SFA) to District Line Platform 1. The design will serve as the basis for further refinement to ensure compliance with LU and Network Rail standards, while also addressing constraints such as the station's listed status.
- 16.164 At West Kensington, the 2041 development scenario triggers the need for gate line enhancements. The 2031 scenario was not assessed due to the phased build-out, which means the London Borough Depot (LBD) will not yet be relocated, and development impacts will be minimal.
- 16.165 The 2041 demand, however, would render the station inoperable without controls. A design has been submitted that includes: a reconfigured ticket hall, a new walkway and stairs and step-free access to both platforms.
- 16.166 Further design work is required to incorporate staff facilities, address the future of retail units, and ensure adequate gate line and staircase capacity. TfL expects the developer to fully fund and deliver SFA in line with London Plan

Policy T1, which requires development proposals to facilitate step-free access to LU stations.

- 16.167 To progress the necessary station mitigation works, collaborative discussions between the developer, TfL, Network Rail, and other stakeholders are required. These discussions will focus on refining designs, establishing cost estimates, identifying delivery triggers, and agreeing mechanisms for implementation. The developer is expected to obtain pre-feasibility cost estimates to support this process and ensure mitigation is delivered in accordance with London Plan Policy T4.
- 16.168 The AM and PM peak hour operational passenger crowding levels expected on the rail network across London in the various scenarios was assessed, including the Early Phases development scenario in the future year of 2041. The assessment showed very similar results for the 2041, it is therefore considered that at a network wide level the impacts of the 2041 are no worse than what has already been assessed in the TA.
- 16.169 A package of station mitigation was set out within the TA to address capacity constraints at both West Brompton and West Kensington Stations. TfL have requested that Station Option Studies (commensurate with TfL's Pathways Stage 2 Option Study) are prepared for the two stations. These studies are currently being prepared and appropriate contributions towards station improvements will be secured through the S106 agreement.

Bus network

- 16.170 London Plan Policy T3 requires development proposals to support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.
- 16.171 The TA included an evaluation of future year bus capacity in relation to the demand generated by the development was undertaken to forecast how demand will affect individual bus routes and stops. This is particularly important for identifying where service enhancements may be required and ensuring that mitigation measures are proportionate and effective.
- 16.172 The development is expected to generate significant increases in bus demand across several key stops and services in both the Early and All Phases scenarios. The TA Addendum provided a granular breakdown of boarding and alighting activity during peak hours, enabling a clearer understanding of how individual services and stops will be affected.
- 16.173 The All Phase Scenario 2041 assessment showed In the AM peak, the West Kensington Station bus stop (ID: 11255) is forecast to experience the greatest increase in demand, with 173 additional passengers (74 boarding, 98 alighting). The most affected service is the 28, which would see an increase of 104 passengers, equating to approximately 26 additional passengers per bus, assuming four services per hour.

- 16.174 The West Kensington Estate stop (ID: 11254) follows closely, with a total increase of 150 passengers, primarily impacting the 306 service. This would result in approximately 21 additional passengers per bus during the AM peak.
- 16.175 West Cromwell Road (ID: BP2068) also sees notable increases, with 124 additional passengers in the AM peak, most of whom are using the 328 service. This translates to around 15 additional passengers per bus.
- 16.176 In the PM peak, demand shifts slightly, with West Cromwell Road becoming the most impacted stop (138 additional passengers), followed by West Kensington Station (115) and West Kensington Estate (100). The same services 328, 28, and 306 remain the most affected, with per-bus increases ranging from 16 to 17 passengers.
- 16.177 For the Detailed Component, the demand increases are more modest but still relevant for operational planning. In both AM and PM peaks, West Cromwell Road, Earls Court Station, and Empress State Building / West Brompton are the most affected stops.
- 16.178 At West Cromwell Road, the 328 service sees an increase of 27 passengers in the AM peak and 17 in the PM peak, equating to 6 and 4 additional passengers per bus respectively.
- 16.179 At Earls Court Station, the 328 and C3 services are most impacted, with increases of 16 and 13 passengers respectively across the peaks. This results in approximately 4 additional passengers per bus.
- 16.180 At Empress State Building / West Brompton, the 430 and 74 services see increases of up to 12 passengers, translating to 2–6 additional passengers per bus depending on the peak hour.
- 16.181 A sensitivity test combining Early Phases development demand with the 2041 Base Minus scenario was undertaken to evaluate potential peak hour impacts. The results confirm that while demand increases are notable, they remain within the operational capacity of the existing bus network, assuming appropriate service adjustments are made.
- 16.182 Based on the current analysis, it is likely that increased bus frequencies will be needed on certain routes serving the site, particularly during peak hours. TfL has indicated that a financial contribution from the developer, in the form of pump-priming support for a five-year period may be required. The scale and timing of these contributions will be aligned with the phasing of development and occupation.
- 16.183 In addition to service capacity, the TA acknowledges that proposed highway mitigation measures may result in bus journey delays, which would require either design-led solutions or further financial mitigation to maintain service reliability. To accommodate the forecast demand, TfL has indicated that increased bus frequencies may be required on certain routes, particularly the

28, 306, 328, 430, and 74. These enhancements may necessitate financial contributions from the developer, likely in the form of pump-priming support for a five-year period, with the scale and timing to be confirmed following final assessment.

Bus Layover

- 16.184 During construction of the development, a temporary layover solution will be required to ensure continuity of bus services. TfL and the developer have discussed options, and a strategy will be agreed to ensure continuity of bus standing provision throughout the construction period. A critical operational requirement is the reprovision of the existing bus layover facility off Lillie Road, which currently accommodates four buses standing independently. The replacement facility must ensure that each bus stand space is accessible from the commencing stop to support efficient operations. Enhanced driver welfare facilities will also be required to support the smooth functioning of the layover.
- 16.185 Both the permanent and temporary layover facilities, along with associated access arrangements, licences, leases, and maintenance regimes, will be secured as part of any planning permission. These provisions are necessary to comply with London Plan Policies T1 and T3, which require developments to support high-quality public transport infrastructure.

Highway Network and Junction Impacts

- 16.186 The TA for the development includes strategic modelling using TfL's LoHAM model and detailed micro-simulation using VISSIM. The modelling concludes that, due to the development's low car mode share, the overall impact on the strategic highway network is expected to be negligible. However, several junctions in the vicinity of the site, particularly those at Warwick Road, Lillie Road, and Old Brompton Road are already operating close to capacity and may experience increased pressure from servicing vehicles, taxis, and residual car trips.
- 16.187 As part of the TA scoping process, a number of junctions were identified for detailed capacity assessment. These locations were selected based on their proximity to the site and their potential to be affected by development-related traffic.
- 16.188 The junction modelling has been updated for the TAA, with results summarised in Table 37 using a RAG classification system:
- Green: Degree of Saturation (DoS) < 90% or Ratio of Flow to Capacity (RFC) < 0.85n
 - Amber: DoS 90–99% or RFC 0.86–0.99
 - Red: DoS > 100% or RFC > 1.00
- 16.189 It is important to note that the 2022 Base, 2031 Base Minus, and 2041 Base Minus, scenarios have not changed and were not re-run. Consequently, junctions such as Lillie Road/Empress Place/Seagrave Road and Lillie

Road/Lillie Road Bus Layover were not revisited. Similarly, the North End Road/Mund Street junction was excluded due to changes in the access strategy, and the Warwick Road/Cluny Mews junction was not reassessed as it functions as an entry-only junction.

- 16.190 The findings for A4 West Cromwell Road/North End Road junction show In the 2031 Early Phases scenario, the A4 western arm reaches a DoS of 90.4%. In the 2041 All Phases scenario, the North End Road southern arm reaches 94.4%. A mitigation scheme for this junction was identified.
- 16.191 The modelling for North End Road/Lillie Road junction in the 2041 All Phases AM peak shows a maximum RFC of 0.72 on the North End Road northern arm. A mitigation scheme focused on pedestrian and cyclist improvements has been discussed with stakeholders.
- 49.192 The Old Brompton Road / Finborough Road / Warwick Road junction reaches a DoS of 95.3% on the Old Brompton Road western arm in the 2041 All Phases AM peak. While vehicular capacity is constrained, improvements to pedestrian crossing provision are proposed to enhance conditions for non-vehicular users.
- 16.193 The Lillie Road/Empress Place/Seagrave Road junction (Proposed Layout) In the 2031 Early Phases PM peak, the eastbound arm of Lillie Road reaches a DoS of 89.4%, approaching the amber threshold. However, the design prioritises pedestrian and cycle movement and incorporates future year flows, including background growth. These enhancements are expected to significantly improve conditions for active travel users.
- 16.194 The updated junction modelling confirms that most junctions will continue to operate within acceptable capacity thresholds, even with the additional demand generated by the development. Where junctions approach or exceed capacity, targeted mitigation measures have been identified, focusing on both vehicular flow and improvements for pedestrians and cyclists.
- 16.195 These measures will be secured through planning obligations and coordinated with TfL and borough stakeholders to ensure compliance with London Plan Policy T4, which requires developments to appropriately mitigate their transport impacts.
- 16.196 To assess the wider network impacts of the development, VISSIM microsimulation modelling was undertaken, covering both the Early Phases and All Phases scenarios. The study area and selected journey time routes reflect key corridors around the site including Warwick Road, Lillie Road, and North End Road.
- 16.197 The study area and selected journey time routes reflect key corridors around the site including Warwick Road, Lillie Road, and North End Road. The study area and selected journey time routes reflect key corridors around the site including Warwick Road, Lillie Road, and North End Road.

- 16.198 Following stakeholder feedback, the 2031 and 2041 Base Minus scenarios were updated in the TA Addendum to reflect committed schemes in the local area. These include pedestrian improvements at the Kempsford Gardens / Old Brompton Road junction and new pedestrian and cycle crossings at the Old Brompton Road / Warwick Road junction. These updates ensure the base scenarios more accurately reflect future conditions.
- 16.199 In the AM peak for the early phase, the most significant journey time increases are observed on:
- :
- Route 3 Northbound (Warwick Road): 124–158 seconds.
 - Route 5 Eastbound (Lillie Road): 124–158 seconds
- 16.200 These are notably lower than the original TA estimates, which reported increases of 205 and 216 seconds respectively. Other routes show minimal delay, indicating that the Early Phases have a limited impact on the wider highway network.
- 16.201 In the PM peak, the same routes show increases of:
- Route 3 Northbound: 70–96 seconds
 - Route 5 Eastbound: 70–96 seconds
- 16.202 These impacts are significantly reduced when compared to the TA figures, suggesting that the revised modelling presents a more accurate and less severe impact profile.
- 16.203 In the All Phase All Phase AM peak, the most affected routes are:
- Route 3 Northbound (Warwick Road): 133–144 seconds
 - Route 5 Eastbound (Lillie Road): 133–144 seconds
 - Route 2 (North End Road): 113 seconds southbound, 82 seconds northbound
- 16.204 The increase on North End Road is higher than previously reported, which is due to the removal of Mund Street access and increased trip generation.
- 16.205 In the PM peak, journey time increases are on:
- Route 3 Northbound: 78–146 seconds
 - Route 5 Eastbound: 78–146 seconds
 - Route 2 (North End Road): 25 seconds southbound, 93 seconds northbound
- 16.206 These results confirm that while most of the network remains resilient, Warwick Road, Lillie Road, and North End Road are locations where journey time impacts may be more pronounced, particularly in the All Phases scenario. To mitigate these traffic impacts and to prevent/deter rat-running on the surrounding residential streets within LBHF, a Traffic Reduction S106 obligation has been secured to deliver traffic reduction measures (the design of any measures will be coproduced with LBHF stakeholders).

Junction Capacity and Mitigation

16.207 Updated junction modelling has been undertaken to reflect changes as a result of the mitigation package. The results, show that most junctions continue to operate within capacity, even with the development and mitigation in place. Key findings include:

- North End Road/Lillie Road: RFC of 0.72 in the 2041 AM peak, indicating operation within capacity.
- A4 West Cromwell Road/North End Road: DoS of 101.1% in the 2041 AM peak, indicating over-capacity. However, mitigation measures including a new pedestrian and cycle crossing and junction improvements are proposed. These align with London Plan Policy T1 and are expected to be delivered post-vacation of the Lillie Bridge Depot.
- Earls Court Road/Old Brompton Road: DoS remains below 85% across all scenarios, confirming that the junction operates within capacity.

16.208 The VISSIM microsimulation confirms that while the Earls Court Development has minimal impact on most of the highway network, targeted locations such as Warwick Road, Lillie Road, and North End Road may experience notable journey time increases. These impacts will be addressed through a combination of design-led mitigation, monitor and manage strategies, and active travel enhancements, ensuring alignment with London Plan policies and stakeholder expectations.

16.209 To assess the effectiveness of proposed highway mitigation measures, VISSIM microsimulation modelling was undertaken for both the 2031 Early Phases and 2041 All Phases scenarios. The mitigation modelling used the same study area and journey time routes as the original assessments, ensuring consistency in evaluating network performance.

16.210 The mitigation package includes targeted interventions at key junctions and corridors, such as signal timing adjustments, pedestrian and cycle enhancements, and junction layout changes. These measures were developed in response to stakeholder feedback and refined through the VISSIM Model Audit Process (VMAP) led by TfL.

16.211 In the Early Phase AM peak, the most notable journey time changes were observed on:

- Route 4 Southbound (Earls Court Road)
- Route 5 Eastbound (Lillie Road)
- Route 3 Northbound (Warwick Road)

16.212 These increases are attributed to signal timing changes at the Earls Court Road/Old Brompton Road junction, where even minor adjustments have a pronounced effect due to existing congestion levels. Despite these increases, the overall network remains operational, and the changes are considered acceptable given the benefits to pedestrian and cycle movement.

16.213 In the PM peak, similar patterns were observed, with the greatest journey time increases on:

- Route 5 Eastbound and Westbound (Lillie Road)
- Route 4 Southbound (Earls Court Road)

16.214 These are linked to the junction modifications, and while delays are present, they are offset by improved conditions for non-vehicular users.

16.215 In the all phase AM peak, the most affected routes were:

- Route 4 Southbound (Earls Court Road)
- Route 5 Eastbound (Lillie Road)
- Route 2 Northbound and Southbound (North End Road)

16.216 These impacts reflect the cumulative effect of multiple mitigation measures, including the new pedestrian and cycle crossing on the A4 West Cromwell Road and further signal adjustments. While journey times have increased, particularly on North End Road, the network continues to function within acceptable parameters.

16.217 In the PM peak, the same routes show the greatest changes, with journey time increases consistent with the AM peak. These results confirm that while the mitigation measures introduce some delay for vehicular traffic, they provide substantial benefits for active travel and align with the objectives of London Plan Policy T1.

16.218 The VISSIM mitigation modelling demonstrates that the proposed interventions are effective in managing the impacts of the Earls Court Development. While journey time increases are observed on key corridors, particularly Warwick Road, Lillie Road, and North End Road, these are largely the result of deliberate design choices to prioritise pedestrian and cycle movement.

16.219 The modelling confirms that the network remains operational under both the Early and All Phases scenarios, and that the mitigation package supports a balanced approach to transport planning enhancing accessibility, safety, and sustainability in line with strategic policy objectives.

16.220 Following feedback from LBHF, the TAA included an extended analysis of five junctions located outside the original study area agreed during the TA scoping process. These junctions were specifically identified by LBHF as potentially sensitive to development-related traffic and include:

- J1: Dawes Road / North End Roads
- J2: Fulham Road / North End Roads
- J3: Fulham Palace Road / Lillie Roads
- J4: Lillie Road / Munster Roads
- J5: A4 Talgarth Road / Gliddon Roads

- 16.221 To assess potential impacts at these locations, traffic flow data was extracted from TfL's LoHAM strategic highway assignment model, which includes a 2016 base year and forecast years for 2031 and 2041. The model has been locally updated to reflect the Earls Court Development and provides a reliable basis for assessing wider network effects.
- 16.222 The total demand flow (in PCUs/hr) through each junction during the AM and PM peak hours across the base and forecast scenarios was assessed.
- 16.223 The comparison between the 2031 and 2041 Base Minus scenarios and the 2016 Base reveals that in some cases, junction demand is expected to decrease. Notably, at Fulham Palace Road / Lillie Road, LoHAM predicts reduced traffic volumes due to increased congestion at the A219 Hammersmith Gyratory, which causes traffic to reroute away from Fulham Palace Road. When comparing the 2031 Early Phases and 2041 All Phases scenarios to the base years, the analysis shows only minor changes in junction demand at all five locations. These changes are not considered significant and do not indicate any material impact on operational capacity.
- 16.224 The extended junction analysis confirms that the Earls Court Development is not expected to materially affect highway operations at the five LBHF-identified junctions. The changes in traffic volumes are minor and fall within the range of normal network variation. As such, no further assessment or mitigation is considered necessary at these locations.
- 16.225 A sensitivity test was undertaken to assess the potential impacts of the Early Phases (Phases 1–4) of the Earls Court Development in the future year of 2041, rather than the 2031 scenario originally used in the TA and Environmental Statement (ES).
- 16.226 The sensitivity test confirmed. In most cases, impacts are either reduced or remain consistent with those previously assessed. This reinforces the robustness of the transport evidence base and supports the continued use of the original modelling assumptions for planning and mitigation purposes.

Framework Travel Plan

- 16.227 A Framework Travel Plan will be implemented to support sustainable travel behaviour across the Development.
- 16.228 The Framework Travel Plan (FTP) sets out a comprehensive, long-term strategy to support sustainable travel behaviour across the Development. Its purpose is to establish site-wide objectives, targets, and measures that will encourage active and sustainable modes of transport while reducing reliance on private car use. The FTP is conceived as a 'live' document, evolving as the development is built out and responding to changes in travel patterns, infrastructure, and policy requirements.
- 16.229 The FTP is aligned with the principles of the London Plan (2021) and the Mayor's Transport Strategy, which aim to achieve a significant shift towards

sustainable travel, with a target that 80% of all trips in London will be made by walking, cycling, or public transport by 2041. By embedding these principles, the FTP ensures that the Proposed Development contributes to London's vision for a healthier, greener, and more accessible city.

- 16.230 The FTP acts as an overarching strategy document for the Proposed Development, guiding sustainable travel behaviour across all land uses. It sets out clear objectives and targets, supported by practical measures and a robust monitoring framework. The FTP will remain active throughout the build-out phase, with regular updates to reflect progress and emerging opportunities.
- 16.231 To deliver its objectives, the FTP includes a series of commitments that will shape travel behaviour and embed sustainability into daily life at the development. A Sustainable Travel Manager (STM) will be appointed to oversee implementation, monitoring, and review at a site-wide level, supported by Travel Plan Representatives at individual plot level. A Travel Plan Working Group will provide governance and coordination, guiding the delivery of initiatives and responding to feedback.
- 16.232 Residents and employees will be engaged through digital travel welcome packs, which will include maps, sustainable travel initiatives, and details of services such as car clubs. Sustainable travel information will also be integrated into the development's website and app, providing easy access to resources and real-time updates. A cycle user group will be promoted to encourage cycling and foster a sense of community among users. These measures will be supported by infrastructure such as secure cycle parking, electric vehicle charging points, and designated spaces for car clubs.
- 16.233 A Framework Travel Plan will be implemented to support sustainable travel behaviour across the development, and its effectiveness will be secured through planning obligations. Monitoring will be a cornerstone of this approach. Annual travel surveys will be undertaken to capture mode share, trip purpose, and barriers to sustainable travel among residents, employees, and visitors. These surveys will provide the evidence base for ongoing review.
- 16.234 The Travel Plan will include mode share tracking, with clear targets for walking, cycling, public transport, and car use. Annual reporting will track progress against these targets and identify emerging trends or issues. Where targets are not met or travel behaviour deviates from expectations, the FTP will include mechanisms for adaptive mitigation measures, such as increasing cycle parking, improving wayfinding, or introducing engagement campaigns to address gaps.
- 16.235 A formal governance structure will be established, involving officers from LBHF, RBKC, and TfL. This group will oversee monitoring, review survey results, and agree on any necessary adjustments to the Travel Plan. This collaborative approach ensures accountability and responsiveness throughout the life of the development.

16.236 The Framework Travel Plan provides a robust and adaptable strategy for promoting sustainable travel across the Proposed Development. By embedding London Plan principles, committing to continuous monitoring, and establishing strong governance arrangements, the FTP will help create a community that prioritises active travel, reduces car dependency, and supports London's long-term sustainability goals.

16.237 This approach ensures that the Travel Plan remains a living document, capable of responding to real-world conditions and supporting the delivery of a truly sustainable development in line with London Plan Policy T4.

Delivery and Servicing

16.238 Vehicular access to the development is intentionally restricted to the site periphery to preserve the integrity of a pedestrian-prioritised public realm. Controlled access zones are implemented to manage vehicle movements and ensure safety and comfort for pedestrians.

16.239 Key vehicular access points include Lillie Road, Old Brompton Road, Warwick Road, Beaumont Avenue, and Mund Street.

16.240 The internal street network is designed to accommodate low volumes of vehicular traffic, with priority given to:

- Servicing and delivery vehicles
- Emergency access
- Disabled parking provision
- Servicing Strategy and Modelling

16.241 A comprehensive Framework Delivery and Servicing Plan has been developed to support the site's mixed-use character while minimising environmental and operational impacts. This includes:

- Off-site consolidation for large commercial uses to reduce the number of heavy goods vehicles entering the site.
- On-site micro-consolidation hubs to facilitate last-mile deliveries using zero exhaust-emission vehicles or cargo bikes.
- Booking systems for timed deliveries to manage peak hour demand and reduce congestion.
- Dedicated servicing bays distributed throughout the site to support efficient loading/unloading.
- Vehicle tracking analysis to ensure safe and unobstructed access for refuse collection and emergency services.

16.242 The Framework Delivery and Servicing Plan (FDSP) establishes a long term, site-wide strategy for managing deliveries and servicing across the Proposed Development. Its purpose is to ensure that these essential activities are carried out efficiently and sustainably, without adversely impacting the operation of the local highway network or compromising the safety of vulnerable road users, including those with reduced mobility or sensory impairments.

16.243 The FDSP is designed to complement the Framework Travel Plan (FTP) and forms part of a wider commitment to sustainable operations and efficient site management. By embedding best practice logistics principles, the FDSP aims to reduce congestion, improve air quality, and enhance road safety, while supporting the functional needs of residential, commercial, and social infrastructure uses within the development.

16.244 The FDSP seeks to achieve several key objectives:

- Minimise the impact of delivery and servicing trips on the local highway network.
- Promote consolidation and sustainable delivery practices.
- Reduce emissions and congestion associated with freight movements.
- Ensure safe and efficient servicing arrangements for all land uses.
- Support wider environmental and transport objectives set out in the London Plan and Mayor's Transport Strategy.

16.245 To deliver these objectives, the FDSP outlines a package of measures that will govern how deliveries and servicing are managed throughout the life of the development.

16.246 The FDSP encourages the consolidation of deliveries wherever possible. This may include on-site solutions such as residential concierge services, retail click-and-collect facilities, and potentially a dedicated commercial logistics hub. For larger office tenants, off-site consolidation facilities will be promoted to reduce the number of individual trips entering the site.

16.247 Deliveries will be scheduled outside network peak hours wherever feasible, supported by a clear protocol for managing out-of-hours deliveries. This approach will help minimize congestion and improve safety during busy periods.

16.248 The FDSP will promote sustainable delivery options, including the use of cargo bikes for last-mile distribution and engagement with local suppliers. The Freight Information Portal will be used to encourage best practice and provide guidance to operators.

6.249 A vehicle booking system will be implemented, coupled with security-controlled access to certain areas of the development, as outlined in the Security Strategy. This will ensure that servicing movements are coordinated and do not conflict with pedestrian or cycle flows.

16.250 Suppliers will be encouraged to join the Fleet Operator Recognition Scheme (FORS), ensuring high standards of safety, efficiency, and environmental performance.

16.251 Dedicated servicing bays and logistics hubs will be provided within the development to accommodate delivery vehicles without impacting the local highway network. These facilities will be designed to support consolidation and

efficient operations. 16.152 The Transport Assessment (TA) estimates that the early phases of the development will generate approximately 754 servicing trips per day, increasing to:

- 754 trips during the Early Phases
- 1,276 trips across All Phases

16.253 Peak hour impacts have been assessed and mitigated through strategic scheduling and infrastructure design. The servicing approach supports the development's sustainability goals by consolidating movements, reducing emissions, and managing logistics efficiently.

16.254 These figures represent a conservative, worst-case scenario, as assumptions around internalisation and consolidation were removed following stakeholder feedback. Peak hour impacts have been assessed on the basis that 15% of servicing trips occur during peak periods. While this may overstate demand in some cases, it ensures robustness in planning and mitigation.

16.255 Servicing trips will include a mix of cargo bikes, vans, and rigid trucks. Site-wide logistics strategies will aim to consolidate these movements and manage final distribution within the site by bike or on foot, reducing emissions and minimising disruption to the public realm.

16.256 The FDSP will be monitored through the Framework Travel Plan's governance arrangements. Annual reviews will assess the effectiveness of consolidation measures, scheduling protocols, and sustainable delivery initiatives. Where necessary, adaptive measures will be introduced, such as expanding cycle logistics capacity or enhancing booking systems.

16.257 The Framework Delivery and Servicing Plan provides a clear and proactive approach to managing freight and servicing activity across the Proposed Development. Detailed Delivery and Servicing Plans will be secured for each RMA application and the ongoing monitoring will be secured through a S106 obligations.

Construction Logistic Plan

16.258 London Plan Policy T7 and Local Plan Policy T7 seek that all developments prepare a Construction Management Plan to manage the construction impacts and ensure the smooth operation of the highway network. The applicant has submitted Outline Construction Management and Logistics Plans.

16.259 The scale, complexity, and duration of the Earls Court redevelopment will result in significant construction activity across multiple phases. The scale, complexity, and duration of the Earls Court redevelopment will involve extensive enabling works, demolition, and construction activity across multiple phases. This level of activity has the potential to significantly impact the surrounding transport network, local amenity, and public safety if not carefully managed.

16.260 To address these challenges, a robust Construction Logistics Plan (CLP) framework has been developed as part of the submitted Transport Assessment (TA). The CLP sets out measures to mitigate the impacts of construction traffic and ensure safe, efficient, and sustainable operations throughout the development lifecycle.

16.261 Without effective management, construction activity could:

- Disrupt local road networks and bus services.
- Compromise pedestrian and cycle access.
- Exacerbate congestion on key routes.
- Pose risks to road safety and public amenity.

16.262 These risks underline the need for a detailed, phased approach to construction logistics planning.

16.263 An outline CLP has been submitted with the planning application, providing an initial overview of proposed works and early-stage mitigation measures. This document acknowledges stakeholder concerns and commits to addressing them in detailed CLPs for each phase of the development. The detailed CLPs will be:

- Prepared by the appointed Principal Contractor.
- Aligned with Transport for London's CLP Guidance.
- Submitted to and approved by the Council prior to the commencement of demolition or construction works.

16.264 This CLP will be secured via planning condition to ensure compliance. Key Measures in the CLP will include:

- Routing agreements for HGVs, avoiding sensitive residential streets and minimizing conflict with vulnerable road users.
- Temporary access arrangements for construction compounds and site entry points.
- Pedestrian and cycle diversion plans, ensuring safe and legible alternative routes during construction.
- Real-time communication protocols with residents and businesses, including advance notice of disruptive works and access changes.

16.265 Construction traffic will be scheduled to avoid peak periods and minimize conflict with public transport operations. Amenity impacts such as noise, vibration, dust, and air quality will be monitored and controlled through best-practice site management and mitigation measures. Continuous stakeholder engagement will be maintained to minimize disruption and build trust with affected communities.

16.266 Following feedback from LBHF, the demolition and construction access strategy has been revised. Notably, Mund Street and Aisgill Avenue are no longer proposed as access routes. Updated traffic estimates indicate that peak

daily demolition and construction traffic will occur in 2028, with a modest increase of 15 daily vehicle movements compared to previous estimates. Across all phases, the TA identifies an increase of 24 daily vehicle movements compared to the original assessment, while construction worker volumes remain unchanged.

16.267 Further highway modelling may be required to assess cumulative impacts on junction performance, bus operations, and pedestrian flows. These assessments will inform mitigation strategies and be incorporated into the CLP for each phase. The CLP will be a dynamic document, reviewed regularly to ensure that measures remain effective and responsive to changing conditions.

16.268 The Construction Logistics Plan provides a clear framework for managing the transport impacts of demolition and construction activity at Earls Court. By securing detailed CLPs for each phase and embedding best-practice measures, the development will minimize disruption, protect public safety, and maintain the integrity of the local transport network throughout its delivery.

Monitor and Manage Approach

16.269 The planning application seeks consent for a range of different land uses with the majority of the Site in Outline (all matters reserved) and five Plots in Detail (no matters reserved). The Development Specification sets out a series of maximum floorspaces for proposed land uses across the various Development Zones that are identified on the Parameter Plans.

16.270 Within the Development Specification and identified on the Parameter Plans are a series of Development Zones where more than one Predominant Use is identified. This is to allow flexibility for anyone (or more) of those identified land uses to occupy the majority of the floorspace within the Development Zone.

16.271 This flexible approach to the outline elements of the planning applications means that the final development quantum and mix of land uses that comes forwards is unknown at this stage. The TA and TAA submitted with the application have assessed a worst-case scenario from a peak hour trip generation perspective.

16.272 The transport network assessment and package of mitigation measures outlined within the TA and this TAA therefore represent the maximum package of measures that would be required to mitigate the impacts of the Proposed Development.

16.273 The final transport impacts will not be known at this stage as they will depend upon the land use mix that is brought forwards. This means that any triggers that are identified for the purposes of controlling the implementation of mitigation measures secured within the planning consent will be based upon the maximum development parameters land use mix. These maximum development parameters were chosen to represent the worst-case trip generating potential of the land uses proposed within the planning applications.

16.274 The last few years has seen a significant period of change in the transport environment and therefore whilst the Proposed Development is assessed in the future years of 2031 and 2041 it can only be estimated what the level of background growth will be when the development comes forwards.

16.275 A Monitor & Manage (M&M) approach to the implementation of transport mitigation is therefore proposed. The final details of the M&M approach will be worked up and secured within the S106 agreement.

16.276 The M&M approach envisages the following key elements:

- Establishment of a Transport Steering Group made up of representatives of the Transport Stakeholders (LBHF, RBKC and TfL) and the Developer (ECPL)
- Undertaking monitoring prior to occupation (to establish a baseline) and then upon completion of each Phase of development to review the actual impacts arising
- Preparation of a Transport Strategy and Implementation Plan (TSIP) to report the results of the monitoring and set out a series of recommendations
- Review of the provisional triggers for implementation of mitigation to identify if measures are required to be implemented.
- Where measures are identified through the TSIP to be required (and the conclusions of the TSIP agreed by the Steering Group) to review the scope of mitigation
- To oversee the implementation of mitigation measures in accordance with the TSIP findings and aligned with any applicable planning obligations and the S106 Agreement.

Highway and Transport Mitigation Package

16.277 The proposed development will be delivered over a 20-year build-out period and will interface significantly with the surrounding highway and transport network within LBHF. Given the flexible nature of the outline application, a phased and adaptive approach to transport mitigation is essential to ensure that impacts are managed and sustainable travel is promoted throughout the life of the project.

16.278 The following works will be delivered under Section 278 Agreements:

- Lillie Road Reconfiguration: Improve public realm for walking and cycling, provide vehicle access points into MOPAC, bus layover facilities, and a new service access road off Lillie Road and Empress Place. Includes public realm improvements to the section of Lillie Road between West Brompton Station and the Lillie Road Bus Layover.
- Empress Place Public Realm Works
- Lillie Road / North End Road Junction: Deliver improvements to the double-mini roundabout junction.
- Gibbs Green Estate Works: Public realm improvements to Mund Street and Aisgill Avenue.
- Beaumont Avenue Public Realm Works

- North End Road Junction Works: At Beaumont Avenue and Barons Court Road, including public realm improvements to the section of North End Road between West Kensington Station and Beaumont Avenue.

16.279 To address cumulative impacts and promote sustainable travel, the following measures will be secured through planning conditions and S106 obligations:

- Parking review contribution to limit overspill parking
- Traffic reduction contribution to deliver measures to prevent rat-running in the surrounding residential streets
- Healthy Streets interventions to enhance walking and cycling
- Car club strategy as an alternative to private car ownership
- Micro-mobility infrastructure provision
- S106 contributions to TfL for station upgrades and bus capacity enhancements

16.280 Given the phased nature of the development, an ongoing monitoring and governance structure will be implemented:

- Transport Steering Group funded by the developer to oversee delivery and monitoring
- Delivery and Servicing Plan Monitoring
- Travel Plan Monitoring
- Construction Logistic Plan Monitoring
- Demolition Logistics Plan Monitoring

16.281 Additional Commitments include:

- Permit-Free Agreement
- Demolition and Construction Community Working Group prior to any works commencing
- Highway Stopping Up, Pedestrianisation and Adoption

16.282 The development includes works to the public highway, requiring amendments to the existing public highway boundary and necessitating:

- Realignment of Beaumont Avenue requiring a Stopping Up Order under Sections 247 and 248 of the Town and Country Planning Act 1990, and Section 38 and Section 278 Agreements under the Highways Act 1980
- Securing of easements for works affecting Mund Street and Aisgill Avenue. These requirements will be secured through a Grampian-style planning condition, ensuring that no development affecting these areas can commence until the necessary legal processes and agreements are completed.
- Pedestrianisation of Empress Place

16.283 These requirements will be imposed as a Grampian-style condition/obligation as the works involve alterations to the public highway outside the applicant's control and must be completed prior to commencement of the relevant phases of development.

Infrastructure Protection

- 16.284 Beneath the site is an extensive network of railway infrastructure including the District Line and Piccadilly Line, and the LBD that is currently used as a maintenance Facility by London Underground Ltd (LUL) and as a TfL training facility. Infrastructure Protection conditions will be required, and TfL's Infrastructure Protection team will advise the LPAs of these as necessary.

Conclusion

- 16.285 Subject to the mitigation including conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies, Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction. It would also accord with the relevant Local Plan policies.

17 ENVIRONMENTAL CONSIDERATIONS

Sustainability

- 17.1 Provision of sustainable development is a key feature of the NPPF. Section 14 of the NPPF seeks to ensure that developments plan for climate change.
- 17.2 **London Plan Policies GG5, GG6 and SI 5** promote development moving towards a low carbon economy, and supports development that adapts to a changing climate, and achieves the equivalent of BREEAM excellent 'standards.
- 17.3 **Policy CC1 of the LBHF Local Plan** requires major developments to implement energy conservation measures, meet the sustainable energy policies set out in the London Plan, and implement passive design measures. **Policy CC2** requires the implementation of sustainable design and construction measures.
- 17.4 A site-wide Sustainability Strategy, Sustainability Statements for Development Plots WB03, WB04 and WB05 and associated Addendums and Technical Notes have been submitted. The sustainable approach for the proposed development has been considered alongside the Energy Strategy/Energy Strategy Addendum and the Whole Life Carbon and Circular Economy Strategy Addendum and Overheating Risk & Thermal Comfort Strategy Addendum
- 17.5 The Sustainability Strategy provides the sustainability objectives for the outline components and sets out 'Principles for Future Living' including Beyond Net Zero Carbon, Delivering Clean Air, Circular Resource Use, Healthy Living, Water Neutral, Celebrating Nature and Certifications. The aspiration is for the proposed development to be climate positive.
- 17.6 Objectives for future RMAs include:

- Target BREEAM Communities 'Excellent' certification, with an aspiration to achieve 'Outstanding'.
- For non-residential buildings, target BREEAM Excellent with the aspiration for Outstanding.
- Within office buildings, achieve WELL Building Standard (WELL) Gold rating with the aspiration for Platinum.
- For residential buildings, target Home Quality Mark ("HQM") rating of 4, with an aspiration to achieve 5.
- Aspire is also to utilise BREEAM In-Use to verify actual performance post-completion.
- Design to Passivhaus principles. Aim at high performance for residential uses and considering NABERS UK rating to demonstrate energy efficiency, aspiring to a 5.5* rating for offices.
- Implementation of an all-electric energy strategy when utilising the district network to ensure zero on-site emissions in operation.
- Implement Solar PV (or other renewables) on selected, appropriate green roofs (bio-solar roofs) across the Proposed Development.
- Implementation of a 5th generation 'Ambient Loop' energy network.
- Achieving at least 10% lower pollutant levels on-Site compared to the Borough averages.
- Retain buildings and structures which are suited to the requirements of the Site, such as 'The Table'.
- Target 20% of materials in the proposed development that can be reused and/or contain recycled content to minimise carbon impacts.
- Minimise construction waste by diverting more than 95% from landfill for reuse, recycling, or recovery.
- Enable more than 65% of operational waste from all users to be diverted from Landfill.
- Create a fully accessible and inclusive environment with step-free mobility across the Site.
- Improvements to wider pedestrian and cycle infrastructure around the site and the provision of play space for all children.
- Achieve over 85% Biodiversity Net Gain.
- Commitment to a minimum of 1,000 new trees, of which 50% will be semi-mature.
- Improve the Urban Greening Factor of the Site beyond the current baseline to >0.4 across the whole Site.
- Ensure all landscape is watered using rainfall and grey water from the Site.
- Attenuate all rainfall on Site, with it either being used or infiltrated to the ground for the most frequent storm event, reducing runoff rates from the Site by over 95%. Overall reducing the risk of sewer and surface water flooding for the surrounding area and achieving less than the runoff from a greenfield site, with significantly lower runoffs from the previous uses of the Site.
- Design water efficient buildings, minimising potable demand through the use of low flow fittings, rainwater harvesting and greywater recycling where appropriate, proposing less than 105 litres of water per person, per day ("l/p/d"), with an aspiration for less than 80 l/p/d in residential buildings.

- 17.7 The non-residential elements of detailed plots including WB03 have been designed to achieve BREEAM 'Excellent' ratings, achieving a pre-assessment score of 74.4%. The residential elements are targeting HQM 4 and WB04 and WB05 achieve a pre-assessment score of 298. These certifications all exceed relevant planning policy requirements. The use of water efficient fittings and rainwater and greywater harvesting are proposed. Plot WB03 will aim to achieve 95 l/p/d and Plot WB04 and WB05 will aim for 80 l/p/d water use.
- 17.8 The proposal aims to achieve Net Zero Carbon (in line with GLA definition) and go beyond policy to consider impacts beyond buildings based on the initiatives and objectives outlined above.
- 17.9 The Local Plan highlights the importance of invigorating local centres, providing accessible community services, and ensuring new community developments meet local needs without negatively impacting the environment or the existing residents' amenities. The Sustainability Statement includes a section on "Social Value" goals that the development will set out to achieve, in addition to environmental wellbeing and economic inclusion, namely:
- A safe, inclusive, and supportive place for everyone
 - A wonderful place to live, work and visit
 - Involving local people

Energy Strategy

- 17.10 **Section 14 of the NPPF** requires development to be planned in ways that reduce greenhouse gas emissions, while both local and national policy requires development to be net Zero-Carbon.
- 17.11 **London Plan Policy SI 2** requires the minimisation of both annual and peak energy demand in accordance with the energy hierarchy. Major development must also achieve a 35% minimum reduction in total carbon dioxide emissions against the Building Regulations part L 2021 baseline, with separate targets of at least 10%-15% of this being achieved via energy efficiency measures alone where possible, with the higher 15% target applying to non-residential schemes. The GLA also have a separate benchmark of 50% CO2 reduction for major residential developments. Any remaining emissions should be off set through a cash in lieu contribution to the Council to help fund implementation of local carbon reduction measures. The energy hierarchy approach requires steps to be taken in the following order when developing the Energy Strategy:
- 1) Be Lean: use less energy and manage demand during operation
 - 2) Be Clean: supply energy efficiently and cleanly
 - 3) Be Green: maximise opportunities for renewable energy
 - 4) Be Seen: Monitor, verify and report on energy performance.
- 17.12 **Local Plan Policy CC1** requires all major development to be accompanied by an Energy Strategy, demonstrating how developments have optimised building design to reduce energy demand and carbon dioxide emissions.
- 17.13 An Energy Strategy and Energy Strategy Addendum have been submitted with the application. This overarching Energy Strategy is supported by the Energy

Assessments included in the Sustainability Statements for the Detailed Component, namely WB03, WB04 and WB05. This proposes a 'fabric first' approach in line with the London Plan energy hierarchy, resulting in a net-decrease in carbon dioxide emissions, compared to Building Regulations requirements. The Energy Strategy provides a framework for the Outline Components, with separate Sustainable Design Performance Statements provided for the Detailed Component. Passive design, energy efficiency measures and use of a heat network powered by electric heat pumps, supplemented by PV panel installations set the basis for reducing energy demand and CO2 emission reduction. Commitments and targets set out within the Energy Strategy are captured within the S106 Agreement.

17.14 Proposed initiatives are set out to reduce energy demand and carbon dioxide emissions and include the following proposals:

- Adopt an all-electric strategy except the use of carbon based HVO emergency generators, using 5th generation 'Ambient Loop' energy network, to meet the heating, hot water and cooling demands of the development, using Air Source Heat Pumps (ASHPs) and Water Source Heat Pumps (WSHPs).
- Proposed that the energy network will extend beyond the site boundaries of the proposed development. Will reduce energy consumption and enable site-wide CO2 emissions savings of over 65% compared to a gas boiler-based strategy.
- Deliver net zero carbon on-site emissions for all buildings, plots, and public realm functions when connected to the 5th generation 'Ambient Loop' energy network.
- Design residential buildings using Passivhaus principles where practicable and where possible, aiming at high environmental performance for residential uses.
- Implement Solar Photo Voltaic ("PV"), or other suitable renewable energy sources on appropriate green roofs (e.g. bio-solar roofs), providing at least 280kWp of installed capacity, generating enough energy annually for over 65 homes.
- Set a voluntary target 'carbon budget' for all buildings, plots, and components of the site which aims to go beyond policy.
- Co-locate energy network plant and equipment to minimise embodied carbon, maximise operational efficiency and create more opportunities for amenity use.
- Reduce the up-front embodied carbon of buildings, targeting less than 500kgCO2/m2 for domestic and less than 650kgCO2/m2 for non-domestic use.

17.15 For the Outline Component, an all-electric strategy, 5th generation 'Ambient Loop' energy strategy, using ASHPs and WSHPs and bio-solar roofs are proposed to be implemented. The proposal avoids producing on-site emissions by using electric heat pumps rather than gas-fired boilers, making a valuable contribution towards achieving the clean air strategy. The 'measures are calculated to achieve over 65% reduction in total carbon dioxide emissions on site, exceeding the London Plan Policy target of 35%. It is anticipated that up

to a 24% reduction in carbon dioxide emissions will be achieved at the 'Be Lean' stage, exceeding the London Plan separate carbon reduction target on energy efficiency of 10% for residential schemes and 15% for non-residential. The remaining carbon dioxide emissions will need to be off set through a cash in lieu contribution. This is currently estimated at approximately £4.37 million (based on £95/Tonne for a period of 30 years) for the whole application (detailed plots and outline plots in LBHF). Further information would come forward at the detailed design stage of the outline components, through the RMA submissions.

- 17.16 In terms of the detailed plots, all the buildings coming forward will be provided with air source heat pumps ("ASHP") and water-source heat pumps ("WSHP"), connected to an ambient loop system. The proposals significantly exceed the London Plan minimum target of 35% reduction in carbon emissions (and the 50% GLA benchmark for major residential schemes), with an overall on-site reduction of 59.55% (WB03), 68.96% (WB04) and 71.3% (WB05) in regulated carbon dioxide emissions over Part L 2021. Energy demand has been reduced, with the two residential-led Plots (WB04 and WB05) exceeding the London Plan target of 10% CO₂ reduction through energy efficiency measures alone, achieving 25.74% (WB04) and 20.7% (WB05). Plot WB03 providing student accommodation is classified as a non-residential use for the purpose of the Energy Assessment, which means it is expected to meet a 15% target in terms of carbon emissions reductions through energy efficiency measures. This has not been demonstrated as it is only calculated to achieve a reduction of 1.23%. It is acknowledged by the GLA that non-residential developments can find it more challenging to achieve this energy efficiency target because the Building Regulations baseline used to calculate the percentage improvements in carbon reductions for non-residential schemes has been changed since the targets were set in policy. However, planning applicants are still expected to follow the Energy Hierarchy to maximise carbon savings before offsetting is considered.
- 17.17 A payment in lieu contribution of £840,000 is estimated payable to LBHF for the detailed early phase development plots (based on the £95/Tonne calculation for a period of 30 years) as the off-set payment. However, using the Council's local costs of carbon to calculate the offset costs shows that an offset payment of £3,101,280 would be required for the detailed plots, based on the submitted energy assessment figures. It is not currently possible to calculate a revised offset payment using the Council's tariffs for the remaining outline element of the scheme, so this will be done as part of the RMA process.
- 17.18 London Plan Policy S I3 requires major development proposals within Heat Network Priority Areas (HNPA) to have a communal low-temperature heating hierarchy. Three energy networks are proposed for the whole site, two in LBHF and one in RBKC, with a network allocated to each Development Zone which will have their own central plantroom. Each network can function independently, but they are also interconnected to maximise energy exchange opportunities between each zone. Some buildings will have rooftop plant such as heat pumps and dry air coolers which will be connected to the central plantrooms. There is also scope for the network to be extended in the future to serve other buildings outside the Earls Court Development, such as the neighbouring MOPAC building and potentially the surrounding residential estates.

- 17.19 **London Plan Policy SI 4 and the London Housing SPG** require the design of development to reduce overheating and reliance on air conditioning systems. **Policy GG6 of the London Plan** further notes that buildings and infrastructure should be designed to adapt to a changing climate, reducing impacts from heatwaves, while mitigating and avoiding contributing to the urban heat island effect. The Overheating and Thermal Comfort Statement and the Sustainability Statements set out the overheating strategy for the detailed plots and how thermal comfort will be maintained throughout summer conditions, both now and in the future.
- 17.20 At the outline stage, the proposed development seeks to minimise the overheating risk through passive design measures first and reduce reliance on active cooling to provide thermal comfort, balanced with the requirements of other design considerations, including noise performance and access to daylight within residential units. A hierarchy of mitigation methods is proposed to be used in combination, where appropriate including minimising internal heat generation through energy efficient design; reducing the amount of heat entering the building in summer; implementing external solar shading; passive ventilation; and mechanical ventilation and active cooling. The final thermal overheating performance will be confirmed through the detailed design process as application(s) for RMA come forward for the different phases.
- 17.21 For the detailed design process, an overheating / thermal comfort analysis has been undertaken for each plot to ensure an appropriate level of thermal comfort is maintained through the summer conditions. The residential buildings will include a series of external shading methods such as boosting Mechanical Ventilation with Heat Recovery (“MVHR”) units and other Plot-specific measures such as tempered cooling. Plots will aim to achieve compliance with DSY1, DSY2 and DSY3 2020 weather files and DSY1 and DSY2 2050 weather files, demonstrating that they would not result in overheating, and are resilient against future climate scenarios. A dedicated thermal assessment has not been applied to the non-residential spaces, although excessive thermal gains were assessed as part of Criterion 3 of the energy (Part L2) assessment, and measures including improving the g-value of the glazing and adding adequate shading to reduce peak solar gains have been applied. On this basis, the detailed components accord with Policy SI 4 and GG6 of the London Plan.

Whole Life-cycle Carbon and the Circular Economy

- 17.22 **London Plan Policy GG6** seeks to improve energy efficiency and support the move towards a low carbon circular economy. **London Plan Policy SI 2** requires development proposals referable to the Mayor, to calculate Whole Life-cycle Carbon Emissions. **Policy SI 7** on Reducing Waste and Supporting the Circular Economy further sets out that resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by promoting a more circular economy, to improve resource efficiency and innovation, keeping products and materials at their highest use for as long as possible. As for the Whole Life-cycle Carbon Assessment, GLA-referable schemes are required to submit a Circular Economy Statement. **The London Housing Design Standards SPG** confirms

that applications for development that are referable to the Mayor of London are required to include a Circular Economy Statement and a Whole Life Carbon Assessment.

- 17.23 In accordance with London Plan Policy SI 2 and Policy SI 7, the applicant has submitted a Whole Life-cycle Carbon Assessment (WLC) to fully capture the development's carbon footprint and reduce whole life-cycle carbon emissions.
- 17.24 The WLC Assessment has been prepared to report the performance of the Proposed Development at a number of life cycle stages through the development process, in line with industry standards. This begins with raw material extraction, moving through product manufacture, transportation, and installation. It then continues into maintenance and use of the Site whilst the development is operational, and eventual material disposal at the end-of-life stage.
- 17.25 To ensure the re-use of materials is maximised on-Site for the Outline Components and that WLC emissions are minimised, each application for RMA will:
- Re-audit the relevant buildings, producing a full materials schedule for these existing buildings
 - Consider the re-use of material and avoidance disposing of material on landfill sites
 - Maximise material reuse on Site, undertake whole life carbon analysis for each proposed scenario and compare the whole life carbon emissions to the breakeven analysis points contained within the Whole Life Carbon and Circular Economy Strategy
- 17.26 The WLC from the Detailed Components has been calculated, demonstrating that the average upfront carbon (A1-A5) for Plots EC05, EC06, WB03, WB04, WB05 is 604kgCO₂e/m², and the average embodied carbon emissions (B1-B5, C1-C4) are 488kgCO₂e/m². These results indicate that all Plots contained within the Detailed Components perform better than the GLA 'Baseline' benchmark for upfront carbon (A1-A5).
- 17.27 The above strategy ensures that a range of circular economy principles are integrated into the design and construction and waste management of the Proposed Development and result in upfront carbon calculations that improve upon the GLA baseline, and overall reduce construction waste, in accordance with Policy GG6 and SI7 of the London Plan.
- 17.28 With regards to supporting circular economy principles, the application has explored opportunities to retain and refurbish buildings or building elements currently on site. A Circular Economy Statement (CES) has been submitted which sets out the strategic approach proposed for the Site. It is focused on defining an approach to principles and identifying high-level strategic opportunities as early as possible in the development process.

- 17.29 The buildings and structures on the Site have been reviewed in terms of their potential to be retained and their suitability for the Site's future redevelopment in accordance with the decision tree in the Mayor of London's Circular Economy Statements LPG, having regard to the Site's Opportunity Area location and Local Plan allocations. This has included exploration of alternative design options for existing buildings / structures with potential to be retained, which have informed the analysis that they do not meet the requirements for the Site before a conclusion is reached to propose their demolition. In LBHF, a terrace of shops along North End Road are to be retained, as are some of the existing TFL train sidings buildings (partial retention). Some buildings require further assessment such as Ashfield House and Empress Place before a final decision can be made. Where existing buildings are proposed for demolition, this is either because retention is not feasible (e.g. because the building has reached the end of its useable life) or, for some buildings, their retention is not compatible with the overall requirements of the scheme.
- 17.30 All buildings and structures proposed for demolition, partial demolition or potential demolition have been analysed as part of the Circular Economy Statement to justify their proposed full or partial demolition, with a plan for on-Site recycling of over 95% of the material, in accordance with planning policy.
- 17.31 All new buildings have been designed around Circular Economy and low WLC principles to maximise recycled content, minimise waste and use low carbon materials. Whole life carbon budgets have been set for all buildings, plots and Development Components, providing a carbon ceiling to show carbon reductions are in line with current policy.
- 17.32 In line with adopted policy, the Circular Economy targets for the Proposed Development in Early and All Phases are as follows:
- 95% of demolition waste materials will be diverted from landfill for reuse, recycling or recovery (over 90% of reuse is assumed on Site)
 - 95% excavation waste materials to be diverted from landfill for beneficial reuse.
 - Over 95% of construction waste materials to be diverted from landfill for reuse, recycling or recovery
 - 65% of municipal waste to be recycled
 - Use materials in the Proposed Development which minimise carbon impacts targeting 20% of materials that are reused and/or contain recycled content.
- 17.33 Regarding the detailed component, the approach to the circular economy is to minimise quantities of materials used for the sub and superstructure; and manage construction waste and excavation waste in line with the Site-wide strategies for the Outline Component, in accordance with relevant planning policy. Further information has been provided on material quantity, assumptions and building end-of-life scenarios.
- 17.34 Planning policy at all levels requires construction to comprise of sustainable waste behaviour, such as re-using and recycling construction and demolition waste, recycling and segregating waste materials when feasible to reduce the

amount of waste going to landfill. The methods of achieving sustainable waste practices include a number of circular economy commitments, including the segregation of construction waste to be recycled and the monitoring of waste streams to help meet identified waste targets. These aims are outlined within the framework Construction Waste Management Plan ("CWMP") which accompanies the Hybrid Applications.

- 17.35 Main contractors and sub-contractors will prepare a detailed Site Waste Management Plan ("SWMP") prior to commencing works on Site, ensuring that the proposed development complies with construction waste policy at all levels, including London Plan Policy SI7, LBHF Policy CC7.
- 17.36 The WLC Assessment and Circular Economy Statement (CES) are integrated into the design principles of the development. Both assessments are largely compliant with GLA guidance. Conditions are secured requiring each phase of the outline component to submit a detailed WLC Assessment and CES as part of reserved matters applications. A condition should also be secured requiring the applicant to submit a post-construction report.

Flood Risk, Drainage and Water Resources

- 17.37 **Section 14 of the NPPF** seeks to meet the challenge of climate change, flooding, and coastal change by supporting the transition to a low carbon future in a changing climate taking account of flood risk and coastal change. **Paragraph 170** states that: "Inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". Paragraph 174 states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source.
- 17.38 **London Plan Policies SI 12 (Flood risk management) and SI 13 (Sustainable drainage)** outline strategic objectives in relation to flood risk management and sustainable drainage. London Plan 2021 Policy SI 12 Criterion C states that: "Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of the watercourses". Policy SI 12, part G states that: "Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat".
- 17.39 **Local Plan Policy CC2** requires major developments to implement sustainable design and construction measures, including making the most efficient use of water. **Local Plan Policies CC3 (Minimising Flood Risk and Reducing Water Use) and CC4 Minimising Surface Water Run-Off with Sustainable Drainage Systems)** contain similar requirements designed to assess and mitigate against the risk of flooding and integrate surface water drainage measures into development proposals.

Flood Risk Assessment

- 17.40 A Flood Risk Assessment has been submitted as required by London Plan Policy SI 12 and Local Plan Policy CC3. The FRA has assessed the risk of flooding to the site and considered the impact of the development on the risk of flooding elsewhere.
- 17.41 The site is located within Flood Zone 3 which indicates a high probability of flooding, with an annual probability of river flooding greater than 1% (1 in 100). However, this does not take into account that the site is protected by the River Thames tidal flood defences which reduce these risks, resulting in an up to a 1 in 1000 (0.1%) chance in any year. The site benefits from strategic flood defences along the Thames, and in the unlikely event of a breach, only isolated pockets of the site are at risk of flooding. Latest flood modelling provided by the Environment Agency shows part of the site is not currently at risk but would be at risk in the future (2100 scenario), if there were to be a breach in the defences or they were to be overtopped.
- 17.42 The Environment Agency is satisfied that the submitted FRA has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data and the development does not propose any sleeping accommodation below the modelled tidal breach flood level. The applicant has confirmed that finished floor levels are to be set 300mm above the breach level, and that flood resilience measures are proposed. They have identified that there is potential for elevated groundwater levels beneath the site and propose that Basement Impact Assessments will be undertaken to inform mitigation. This would be secured by condition, with any groundwater monitoring ideally taking place during winter months.
- 17.43 The Reserved Matters Applications for outline Development Zones would need to demonstrate how the flood risks are mitigated for the proposed uses. Sustainable drainage features would be incorporated into the development, including the public realm to manage surface water run-off. Further details on these proposals are set out in the Drainage Strategy.

Drainage Strategy

- 17.44 The applicant's drainage strategy follows the CIRIA SuDS Manual as well as the SuDS Drainage Guidance adopted by both boroughs, which implements flow-matching for the 1 in 1-year and 1 in 100-year events, long-term storage, and volume reduction to achieve less than greenfield run-off rate discharges to the sewer network. This is supported in accordance with London Plan Policy SI 13.
- 17.45 For the purposes of assessing drainage requirements, the Site has been divided into a series of 10 catchment areas. Plots WB03, WB04 and WB05 of the Early Phases are in Catchment Area 8 where the main sustainable drainage measure is the use of infiltration into the ground through nature-based SuDS features such as soft landscaping including raingardens and tree planting and permeable paving. Rainwater harvesting and green roofs will also contribute to attenuation of surface water discharge rates. Measures have been sized to

accommodate the 1 in 100-year storm event + climate change factor to account for future increases in rainfall. Without attenuation, discharge rates have been calculated to range from 558 l/s to 2261 l/s for different storm events in the Early Phase scheme.

- 17.46 The proposed Drainage Strategy is calculated to reduce this range to 2.4 l/s to 9.3 l/s. For smaller storm events there is capacity to manage run-off just with the on-site SuDS measures without needing to discharge to the sewer network but in the event of heavier rainfall, storm water will be discharged to the sewer at the controlled rates which are lower than the greenfield rate for the Site and provide significant betterment.
- 17.47 In terms of the wider site, similar SuDS measures are proposed for all catchments, although there are some which are not suitable for widespread use of infiltration due to constraints such as proximity of railways and associated infrastructure or unsuitable ground conditions in that catchment. Some catchments will need to use attenuation tanks to store storm water for re-use or controlled release into the sewer network. Re-use of rainwater will be prioritised as part of a sitewide irrigation network where collected rainfall will be used for landscape irrigation. The tanks will have capacity to provide over 1 month of storage of irrigation water and will help minimise or remove entirely the need to use potable water for watering landscaped areas.
- 17.48 Without attenuation, discharge rates have been calculated to range from 922 l/s to 3739 l/s for different storm events for All Phases of the scheme. As is proposed for the Early Phases, the proposal is to reduce this range to 2.4 l/s to 9.3 l/s with the ability to manage run-off from smaller storms on-site. For heavier rainfall, storm water will need to be discharged to the sewer at the controlled, lower than greenfield, rates.
- 17.49 Portable water demand would be managed in a sustainable manner through rainwater harvesting, grey water recycling and water efficient fixtures and fittings. The water supply strategy has been developed in discussions with Thames Water. Water efficient designs for the buildings will also help minimise potable demand through the use of low flow fittings, achieving a better than Building Regulation water use standard of no more than 105 litres of water per person, per day ("l/p/d"), with an aspiration for less than 80 l/p/d in residential building by incorporating rainwater and greywater re-use. Water demand for irrigation of landscaped areas will be reduced by collecting and re-using rainwater.
- 17.50 Thames Water has recommended conditions to appropriately address the site's drainage strategy.
- 17.51 In line with the above and subject to the inclusion of conditions requiring the submission of a detailed surface water drainage strategy and design, officers consider that the proposed approach would be acceptable and in accordance with Policies SI12 and SI 14 of the London Plan and policy requiring flood risk assessment and development to mitigate flood risk, Policies CC3 and CC4 of the Local Plan which requires development to minimise future flood risk.

Land Contamination

- 17.52 **NPPF Paragraph 196** requires that planning decisions should ensure that sites are suitable for the proposed new use taking account of ground conditions and after remediation the land should not be capable of being determined to be contaminated land.
- 17.53 **London Plan Policies SD1 and E7** supports the remediation of contaminated sites. **Local Plan Policy CC9 (Contaminated Land)** sets out to ensure that no unacceptable risks are caused to humans, controlled waters, or the wider environment during and following the development works. **Key principles LC1-6 of the Planning Guidance SPG** inform the processes for engaging with the Council on, and assessing, phasing, and granting applications for planning permission on contaminated land. Key principle LC6 supports the use of planning conditions to ensure that development does not commence until full details have been discharged. As such developers are required to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

Contamination Assessment

- 17.54 The application is supported by a preliminary risk assessment and site investigation scheme to assess the risk of contamination. The assessment identifies a range of potential contamination sources associated with the site's historic uses. As highlighted above part of the application site formed part of the Exhibition Centre land, and the LBD is an industrial site. The site is acknowledged to comprise contaminated land which will require remediation, although it is noted that some remediation of the land had already occurred in and around 2015. Matters relating to land contamination have been subject to commentary by residents and third parties on the planning application. The Council's Land Contamination Officer has found the PRA broadly acceptable, subject to conditions to ensure detailed focused assessments are undertaken.
- 17.55 The preliminary risk assessment concludes that the overall risk to human health and controlled waters ranges from very low to moderate, with specific recommendations for further investigation. These include an intrusive ground investigation and Generic Quantitative Risk Assessment (GQRA) to inform the need for any remediation. The scope of the ground investigation would be designed to allow comprehensive characterisation of the ground, groundwater, and ground gas/vapour conditions underlying the site. The findings would be reported in a Phase II report, which would include an updated conceptual site model and, if necessary, a remediation strategy.
- 17.56 The preliminary risk assessment has been reviewed by the Council's land contamination officers who are satisfied with the methodology proposed. For each development zone, conditions would be used to secure an updated preliminary risk assessment, a scope of investigation works, a qualitative risk assessment (i.e. Phase II report) to establish whether any potential risks are posed from land contamination to the site users and a remediation method

statement and verification report to outline works required/undertaken to mitigate risks associated with any identified pollutant linkages. Subject to the imposition of conditions, the proposal is in accordance with Local Plan Policy CC9. Subject to these conditions, the development would comply with the requirements of the NPPF, London Plan policies SD1 and E7 and Local Plan policy CC9.

Air Quality

- 17.57 **NPPF Paragraph 199** relates to air quality. It states planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. The Council's Air Quality Action Plan for 2025-2030 was approved and adopted by LBHF on 16 December 2024.
- 17.58 **London Plan Policy SI 1 (Improving air quality)** supported by the Mayor's Control of Dust and Emissions during Construction and Demolition SPG (July 2014), provides strategic policy on avoiding a further deterioration of existing poor air quality. An Air Quality Assessment (AQA) is expected to be submitted for all major development. The AQA is required to demonstrate how development would not lead to further deterioration of existing poor air quality and would not create any new areas that exceed air quality limits (or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits). Development is also expected to achieve Air Quality Neutral status within larger scale development proposals subject to EIA and is encouraged to achieve an air quality positive approach.
- 17.59 **Local Plan Policy CC10 (Air Quality)**, seeks to reduce the potential adverse air quality impacts of new developments through a range of policy measures.
- 17.60 The entire borough has been declared an Air Quality Management Area (AQMA) designated for exceedances of the annual mean nitrogen dioxide (NO₂) and 24-hour mean PM₁₀ objectives. The site is within a GLA Air Quality Focus Area. The introduction of new receptor exposure within an AQFA and AQMA necessitates an assessment of both construction and operational phase impacts. Local air quality can be impacted by development through emissions from the demolition and construction (dust and emissions from demolition and construction activities, plant and traffic) and the operational impacts (traffic and building emissions) (heating / energy)). Developments also need to address any cumulative impact to ensure no deterioration of air quality occurs.
- 17.61 The application is supported by the Air Quality chapter (Chapter 10) in the Environmental Statement (July 2024) and Chapter 10A in the ES Addendum (July 2025) and an Air Quality Positive Statement and Addendum.

Air Quality Assessment

- 17.62 In accordance with London Plan requirements, the applicant has provided an Air Quality Assessment. Air Quality is a key material consideration for the Earls Court development due to the nature and scale of the proposals. Based on the available information and the existing site use (largely disused and derelict, except for the Empress Place at the southern end of the development site), the

key pollution sources are the heavily trafficked roads surrounding the site and the MOPAC Energy Centre

- 17.63 From the submitted documentation, it appears that the key sources of pollution for the LBHF portion of the site will be emissions from the estimated number of construction vehicles (demolition and construction phases) and from the servicing and deliveries activities and 31 emergency biofuel HVO-fuelled generators during the operational phase. Pollutants such as NO_x, NO₂ and Particulate Matter (PM₁₀, PM_{2.5}) will be emitted and have an adverse impact on local air quality, not just on the Earls Court Development site itself, but farther afield within the Borough.
- 17.64 This is significant as the entire borough of Hammersmith & Fulham has been declared an Air Quality Management Area due to exceedances of the Annual Mean and 1-hour Mean for Nitrogen Dioxide (NO₂) and the 24-hour Mean for Particulate Matter (PM₁₀) national objectives. In December 2024 the Council committed in its Air Quality Action Plan 2025-2030 to complying with the more stringent annual mean World Health Organisation (WHO) Air Quality Guideline Values for Nitrogen Dioxide (NO₂) and particulate matter (PM₁₀, PM_{2.5}).
- 17.65 Modelling has been completed for NO₂, PM₁₀ and PM_{2.5} at sensitive receptors for the existing off-site and future on-site sensitive receptors during the Completed Development stage and includes the contribution from road emissions, MOPAC Energy Centre, 61 biofuel HVO emergency generators, NO₂ PC and 2030 Defra Background Concentrations.
- 17.66 All modelled LBHF receptors are expected to meet the National Air quality objectives (NAQO) for NO₂, PM₁₀ and PM_{2.5}. All locations are expected to be in exceedance of the Council's 2030 Air Quality Targets for NO₂, PM₁₀ and PM_{2.5} and the WHO 2021 Air Quality Guideline values.
- 17.67 Additional mitigation secured by conditions will be required for the development to be in accordance with NPPF, Local Plan Policy CC10, London Plan Policy SI1 and the Council's Air Quality Action Plan.

Air Quality Neutral

- 17.68 An Air Quality Neutral Assessment has been undertaken in line with the GLA's London Plan Guidance, Air Quality Neutral (February 2023). The approach is to compare the expected emissions from the building's energy use and associated vehicle trips against defined benchmarks for buildings and vehicle trips in London. As stated in the guidance if one or both benchmarks are not met, appropriate mitigation or offsetting will be required.
- 17.69 The development does not propose the use of combustion plant for the routine provision of electricity, heating, or hot water apart from during an emergency and complete power loss, where backup HVO biofuel generators will be utilised. Generators will be used for less than 50 hours per year for emergency and operational testing. The proposed development is thus considered Air Quality Neutral in terms of building emissions.

- 17.70 The proposed development would be car lite with only essential on-site car parking provided for blue badge holders and visitors. The development includes 12 car club bays. These shall be secured as electric vehicles charging vehicles only to ensure full air quality neutrality can be achieved. For transport emissions, the assessment also concludes that the development would be air quality neutral

Air Quality Positive

- 17.71 The applicant has also submitted an Air Quality Positive Statement. The statement is thorough and includes evidence that air quality has been considered from the design process. The statement includes measures such as the possible provision of an on-site micro consolidation/logistics hub to facilitate last mile deliveries by zero exhaust emission vehicles that go above and beyond standard design scope
- 17.72 The Air Quality Positive statement submitted does not suitably demonstrate that the proposals will enable the development to be Air Quality Positive in respect to both building and transport emissions. This is due to the following:
- No adopted undertaking committing to the installation and implementation and use of an on-site hub micro consolidation/logistics hub to facilitate last mile deliveries by zero exhaust emission vehicles
 - A contradiction in the statement of the development being 'all electric' when it looks to install a large number of HVO-fuelled combustion generators, (42 in the Early Phases and 61 for the All Phases) 33 of which will be situated in Hammersmith & Fulham.
- 17.73 For a development which should be futureproofed, due to the 20+ year construction / operational timeframe, the use of this number of combustion bio-fuelled generators is not acceptable with regards to Air Quality Positive as there will be an adverse impact on local air quality for existing off-site sensitive receptors and future on-site receptors.
- 17.74 The proposed new primary 132kV/11kV electricity substation on the West Crowell Road A4 frontage site boundary and an upgrade of the existing West Brompton Electricity Substation should be prioritised as part of the enabling works for the development plots WB03, WB04, WB05, EC05, EC06 to avoid reliance on combustion fuelled emergency diesel/ biofuel (HVO) generators for the Early Phases and the entire development. If the upgrade of the West Brompton Electricity Substation is deemed unfeasible, a second supply located on the southern border should be identified, scoped into the proposals and installed prior to the commencement of any major construction works.
- 17.75 The feasibility for this additional substation should be reviewed at all relevant stages of the design progression to ensure that the reliance and use of biofuel/diesel generators for backup power is minimised as far as practically possible, particularly in all of the proposed 22 development plots (WB01-WB10, WK01-WK12) in the LBHF part of the overall development.

- 17.76 The development proposal does not demonstrate that the proposals will enable the development to be Air Quality Positive in accordance with London Plan Policy SI1 and the Councils Air Quality Action Plan without additional mitigation as provided by recommended conditions.

Demolition and Construction Works

- 17.77 During demolition and construction works, dust emissions are expected to increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission. Mitigation for the risk of dust and air borne pollutants from the construction of the development would be secured by condition and S106 obligation towards monitoring.

Operational Impacts

- 17.78 It is also recommended that the Council apply conditions or obligations to restrict use of the backup carbon-based biofuel HVO generators to emergency use and the installation and operation of an on-site micro consolidation/logistics hub to facilitate last mile deliveries by zero exhaust emission vehicles such as cargo bicycles and other electric vehicles.
- 17.79 Subject to conditions and S106 contributions, the proposed development would have a minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and can address air quality positively, subject to mitigation. The proposed development would accord with Policy SI1 of the London Plan and Policy CC10 of the Local Plan which seek to improve air quality.

Archaeology

- 17.80 **Paragraph 207 of the NPPF** states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.
- 17.81 **Policy HC1 of the London Plan** recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. **Local Plan Policy DC8** sets out the principles for the conservation and protection of heritage in the borough.
- 17.82 The site does not lie within an Archaeological Priority Area in the Local Plan or contain any Scheduled Monuments. The Earls Court Development Site is however a large site and the development proposes infrastructure, enabling, demolition and construction work. The archaeological potential therefore needs to be assessed despite the site not being within an Archaeological Priority Area.
- 17.83 The application is supported by an Archaeology Statement: The Archaeological Desk Based Assessment (MOLA, Jun 24) and Chapter 6 of the Environment Statement. The Statement identifies that previous archaeological assessments have been carried out on sections of the site in 2014-2016, as part of the demolition of the former Exhibition Centre building. The Statement states that the former Exhibition Centre buildings and underground infrastructure are likely to have removed any potential for archaeological remains. The Statement

identifies this part of the Site as having relatively low to medium archaeological potential as most of the land has been severely truncated by development. Recent geoarchaeological monitoring of geotechnical works and watching briefs to the east of the site support this assessment.

- 17.84 The Statement sets out that the remainder of the site may have low archaeological potential. However, this should be assessed with geoarchaeological monitoring and archaeological evaluation to inform an appropriate mitigation strategy. An archaeological Written Scheme of Investigation ('WSI') to be approved by the Council is proposed during the demolition and construction phases to ensure mitigation and offsetting measures are appropriately captured. A programme of public engagement which highlights the industrial heritage of the site is also recommended and should be designed and completed in tandem with the archaeological investigation.
- 17.85 The Greater London Archaeology Advisory Service (GLAAS) provides archaeological advice to the borough and were consulted. GLAAS accept that part of the site has seen extensive modern disturbance and any archaeological remains surviving are likely to be fragmentary or removed. GLAAS however recommend that the development could cause harm to archaeological remains on less disturbed parts and a field evaluation is needed to determine appropriate mitigation. A two-stage archaeological condition is recommended. The condition would comprise firstly, of an evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. Overall, with the implementation of archaeological investigation, the demolition and construction stages of the development would not give rise to significant residual effects on buried heritage assets. Subject to the imposition of the condition, the proposed development would comply with the NPPF, Policy HC1(d) of the London Plan, and Policy DC8 of the Local Plan.

Noise and Vibration

- 17.86 **Paragraph 191 of the NPPF** requires development to mitigate potential adverse impacts resulting from noise. **London Plan Policies D13 and D14** and **Local Plan Policy CC11** seek to reduce, manage, and mitigate noise to improve health and quality of life. The policies require developers to consider the impact of their developments on the noise environment. The development should ensure that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
- 17.87 Local Plan **Policy CC13** seeks to control pollution, including noise, and requires proposed developments to show that there would be 'no undue detriment to the general amenities enjoyed by existing surrounding occupiers of their properties'. **Local Plan Policy T7** requires all construction, demolition and major logistic activities within the borough to work with the Council in developing the scope and impact of their operations, while the LBHF Construction Code of Practice ("CoCP") provides advice to assist construction works, with further detail on hours of work, noise and vibration, air quality including dust, particles

and Nox, non-road mobile machinery, site logistics, access and deliveries, and communications and public relations.

- 17.88 A Noise and Vibration assessment is included in Chapter 11 of the Environmental Statement Volume 1: Main Report and detailed assessment provided in Volume 3.
- 17.89 The Noise and Vibration Assessment has assessed the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development. The ES has identified the nearest existing noise and vibration sensitive receptors for the different stages of the development. The majority of these relate to residential elements.
- 17.90 Consideration has been given to the impact of increased noise levels during the demolition, construction, and operational phases of development. The cumulative impact of neighbouring construction works has also been taken into consideration. Receptors in different locations around the site have been identified, comprising predominantly existing residential and commercial properties. The impact on the internal ambient noise of the proposed residential buildings and future occupiers of the commercial building has been assessed for the operational stage.
- 17.91 The adverse effects identified during the demolition and construction works will be temporary in nature. These will cease on the completion of the relevant Development Plot and once the Development is completed. During the Early Phases, works are anticipated to increase noise levels immediately adjacent to the site. The highest predicted noise levels are expected to occur during the demolition of the existing buildings. Noise levels are not expected to result in any significant adverse effects within either the Detailed Component or Outline Component, as the extent of the demolition works is limited and mitigation measures would be put in place. The Outline Component in the later phases contains areas of higher risk as Development Zones are located adjacent to West Cromwell Road and railway / underground lines and represent the main noise and vibration source present at the Site.
- 17.92 Mitigation measures are proposed to reduce such impact. Best practice measures are proposed to mitigate against noise and vibration. Measures proposed include controlling hours of working, using appropriate machinery and following best practice procedures. Advanced notifications and consultation of particularly noisy activities is considered beneficial, and procedures should be put in place for noise complaints to be addressed.
- 17.93 A Framework Construction Management Plan ("CMP") has been submitted which details the anticipated demolition and construction programme, works required to enable commencement and completion of the proposed development, and the management of construction hours of work. A Framework Construction Environment Management Plan ("CEMP"), contained within the submitted CMP, sets out a further range of additional measures proposed to

prevent negative environmental effects on the general amenities of existing surrounding occupiers. Mitigation measures proposed include plot-specific management plans, including a more detailed framework Construction Logistics Plan (CLP). A detailed CMP and CLP alongside demolition-related management and logistic plans, when required, would be produced by each appointed principal contractor prior to works commencing on a Development Plot. The CMP would include measures to control impacts and require mitigation measures for demolition and construction lighting, the prevention of water contamination, the embedded ecology mitigation, management measures on the built heritage, townscape and visual impacts. Noise and vibration mitigation associated with demolition and construction works, including control over working hours, types of equipment used, and vehicle movements would be secured by condition. These could also be captured under the S106 agreement.

- 17.94 In the Detailed Component of the proposed development, active uses are located at lower/ground floor levels, and include retail, food and beverage, and cultural uses. At this stage specific users have not been identified so the precise commercial activity and associated noise level cannot be accurately defined. However, the levels of noise generated from the likely type of commercial activity are expected to be relatively low. A series of conditions are proposed to be attached in respect of the hours of use of the office amenity terraces and balconies, as well as a restriction on the use of amplified music on these terraces. Operational management plans for the public terrace and cultural provision would be secured via a S106 agreement, and these will be expected to set out the appropriate noise control measures to minimise disturbance to nearby sensitive receptors. The appropriate noise control measures are likely to be largely based around opening hours and effective security.
- 17.95 An Operational Noise Impact Assessment, prepared as a Noise and Vibration Appendix to the Environmental Statement, has been submitted to support the application. The assessment concludes that there are negligible noise impacts from future operation of the site in terms of predicted operational traffic.
- 17.96 Similarly for the Outline Component a mix of residential and commercial uses are proposed. Given the uncertainty and flexibility in the land uses proposed across the Development Zones, the exact levels of commercial activity and associated noise are unknown at this stage. Mitigation measures for the proposed development would need to be included in the design of the outline plots, through acoustic design and incorporate measures such as glazing and ventilation along with the position of outdoor balconies, so appropriate internal noise levels would be met. As with the Detailed Component, detailed Noise Assessment will be required for each Reserved Matters Application, and this will be secured by condition.
- 17.97 The Council's Environmental Noise Protection officer has reviewed the information and raised no objections to the impact of noise or vibration. If the application is approved, officers recommend that conditions be included to mitigate noise and vibration during the deconstruction/construction activities, including the use of Demolition and Construction Environmental Management

and Logistics Plans and the regulation of the operational phases of the development. A S106 Environmental contribution is also required to monitor the demolition and construction works. Subject to the proposed conditions and S106 Heads of Terms, officers consider the proposed development would comply with policies D13 and D14 of the London Plan and Policies CC11 and CC13 of the Local Plan.

Wind Microclimate

17.98 London Plan policies D3 (Optimising site capacity through the design-led approach), D8 (Public realm) and (D9 - Tall buildings) and Local Plan Policies DC2 and DC3 are relevant in this case.

17.99 **London Plan Policy D3** requires that development optimises site capacity through a "design-led approach," which means using design to determine the most appropriate form and use for a site rather than simply maximizing density. **Policy D8**, related to public realm, requires that development proposals consider wind conditions to ensure pedestrian comfort and safety. Developers must analyse and mitigate wind impacts, particularly at ground level and on elevated spaces like terraces, to prevent excessive speeds that could make public areas unpleasant or unsafe. This includes designing to create shelter, using mitigation strategies like screens or landscaping, and ensuring the development does not negatively impact wind conditions on neighbouring areas. **Policy DC9** requires that tall buildings do not negatively impact the wind environment, ensuring a comfortable and safe pedestrian experience at ground level. Proposed developments must carefully consider and mitigate wind impacts around buildings and in the surrounding public realm. The comfort and enjoyment of open spaces or street-level conditions must not be compromised by the impact of tall buildings.

17.100 The Local Plan does not have a specific policy relating to wind impacts. Policy DC2 requires new developments, especially tall buildings, to consider and mitigate potential adverse wind environments to ensure a suitable microclimate for public and private spaces and implement microclimate mitigation measures if required. Policy DC3 requires tall buildings to avoid negatively impacting the amenities of surrounding premises. While the policy does not specifically mention wind effects, such effects including downdraughts from tall buildings, can cause harm local amenity or safety.

17.101 A Wind Impact Assessment is included in Chapter 16 of the Environmental Statement Volume 1: Main Report and addendum and a detailed assessment provided in Volume 3. Chapter 16 of the ES.

17.102 As some of the proposed buildings are over 50m AOD, both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing have been undertaken by independent experts. The wind tunnel and CFD results broadly give the same assessment results. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

- 17.103 Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis have also been carried out.
- 17.104 Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, buildings entrances, bus stops, ground and terrace level amenity spaces. The assessment uses the wind comfort criteria, referred to as the Lawson Criteria being five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
- 17.105 In considering the significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use because of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
- 17.106 The study area includes all buildings or structures within 450m of the centre of the site. Assessments have been carried out for both the windiest season and the summer season. A series of cumulative configurations have been run, which separates out all consented developments (referred to as “consented cumulative surrounding buildings”), and those which have been submitted but not yet granted planning permission (referred to as “non consented cumulative surrounding buildings”).
- 17.107 In general, the proposed development would have a beneficial impact on the pedestrian comfort. The proposed mitigation would ensure that where there are moderately adverse effects (i.e. a change in wind category) on site these localised areas would still be suitable for the intended use.
- 17.108 A condition is proposed that would secure all necessary wind mitigation and in the instance that not all cumulative schemes are built out, potential wind mitigation measures. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policies D3, D8 and D9, and Local Plan policies DC2 and DC3.

Thermal Comfort Assessment

- 17.109 London Plan Policy D8 and D9 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood, must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal

comfort and delivering improvements in air quality and open space. The London Plan indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

17.110 The Council's Climate Change SPD also provides guidance on how new developments can prevent overheating. As a densely built inner London borough, LBHF is particularly vulnerable to 'Urban Heat Island' effects, in which urban areas can be up to 10°C warmer than surrounding areas. New developments need to be designed and built to provide adequate ventilation and avoid causing overheating in the summer.

17.111 An Overheating Risk and Thermal Comfort Strategy assessment has been submitted. The assessment technique involves merging the effects of wind, air temperature, humidity and solar radiation data to develop an understanding of Thermal Comfort and how the microclimatic character of a place feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence. Design measures included in the sites in the Detailed Component include passive measures to reduce heat gains, provide natural ventilation where possible and provide shading. Active measures are also included where passive measures will not always be sufficient.

17.112 It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policies D8 and D9.

Aviation Safety

17.113 An Aviation Impact Assessment has been prepared and submitted in response on the likely aviation safeguarding effects of the proposed development. The AIA considers the effects of the proposed development construction works, building footprints and heights of the Detailed Component, and the development zone maximum vertical and horizontal parameters in the Outline Component.

17.114 London Heathrow Airport has confirmed that the safeguarding area around the airport has been extended to approximately 50km and now covers the site. Consultation with London Heathrow Airport confirms that the proposed development up to the maximum height of 162 AOD would be acceptable and would not result in any adverse effects on flight operations subject to conditions being attached to any planning permission granted. The proposed conditions are to ensure that a crane management strategy and radar mitigation scheme are submitted and approved by the Council and agreed in consultation with London Heathrow Airport.

NATS and London Heliport

17.115 The National Air Traffic Services (NATS) has confirmed that the upper portions of building WB04 would be of sufficient height to reflect radar signals and cause false aircraft targets to appear on air traffic controllers' displays. Consultation with NATS confirms that the proposed development up to the maximum height

of 162 AOD would be acceptable and would not result in any adverse effects on flight operations subject to a condition being attached to a planning permission. The proposed condition is to ensure that a radar mitigation scheme is submitted and approved by the Council and agreed in consultation with NATS.

- 17.116 London Heliport has been consulted on the proposals and has advised that, as cranes are likely to be required during construction, the applicant will need to liaise directly with the Heliport in accordance with current Civil Aviation Authority guidelines.

18 SOCIO ECONOMICS / EQUALITY CONSIDERATIONS

19 COMMUNITY INFRASTRUCTURE LEVY (CIL) & SECTION 106 HEADS OF TERMS

- 19.1 **Paragraphs 56, 57 and 58 of the NPPF** requires consideration of whether otherwise unacceptable development could be made acceptable using conditions or planning obligations, but only where they are necessary, related to the development, fair and reasonable.
- 19.2 The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the borough's environment and facilities. The proposals would also require payment of the Mayor's Community Infrastructure Levy (MCIL) to help fund the provision of infrastructure.
- 19.3 The proposed development is a phased (hybrid) application and will generate a significant amount of CIL liability in accordance with the Community Infrastructure Levy Regulations 2010 (as amended). Regulation 8(3a) of the Community Infrastructure Levy (Amendment) Regulations 2014 allows for each phase of the development to be treated as a separate chargeable development for levy purposes. In this instance, the applicant proposes phases which would mean Mayoral CIL would only be payable upon implementation of construction works (excluding preparation and infrastructure works). The precise CIL liability would be determined in accordance with the floorspace to be delivered in each Phase and the charging schedule that exists at the time of implementation.

Mayoral CIL

- 19.4 CIL is a flat-rate charge applied to every square metre of chargeable development to fund infrastructure to underpin growth. On 1 April 2019, the Mayor of London adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2"). The development is liable to pay Mayoral CIL. The Mayoral CIL will be passed to Transport for London (TfL) to help fund Crossrail and Crossrail 2.
- 19.5 The Mayoral Community Levy 2 Levy is set at differential rates for the Greater London boroughs. LBHF is in Band Rate 1. The applicable charging rates are based on the following amounts:

- Office 185GBP per sqm
- Retail 165GBP per sqm and Hotel 140GBP per sqm
- All other uses 80GBP per sqm
- Development used wholly or mainly for the provision of any medical or health services or education as a school or college, as an institution of higher education are applied a NIL rate.

19.6 The rates above are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created. Development of social housing are excluded are exempt from MCIL under the 2008 Act and the Regulations.

19.7 In accordance with the Mayor of London's, the Applicant is liable to make a payment of approximately £30.2M towards the Mayor of London's CIL. A proportion of the floorspace would be subject to social housing relief as set out in regulations which may result in a discount to part of the levy. It would be for the applicant to apply for such relief.

Local CIL

19.8 The LBHF Local CIL is used to meet the infrastructure needs of the borough. The site falls within to a nil charge rate (for land within the ECWKOAA) under the borough's CIL Charging Schedules (which came into effect in 2015). With exception to a section within RBKC the site's liability will be Mayoral CIL. The required infrastructure or mitigation measures identified by the borough will therefore need to be funded through the s106 agreement.

S106 Planning Obligations

19.10 The Council's Regulation 123 list sets out the infrastructure that CIL receipts can be spent on. Specifically in relation to the area around the application site, possible recipients of CIL funding are stated as the delivery of a new health facility, cycle routes and parking, and the new cycle and pedestrian schools

19.11 The obligations set out below are required. They are considered necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

Proposed Heads Of Terms

RESIDENTIAL (C3) & AFFORDABLE HOUSING

- Provision of an early-stage review mechanism
- Minimum 2000 new homes across all H&F phases
- 35% AH and tenure split (60:40; intermediate : social rent)
- Potential "equivalency option" to be investigated further to increase % of social rent homes and allow for the possibility of more grant funding
- Preferred size mix of AH to be agreed
- Delivery triggers for AH across all phases to be agreed

- Submission of an AH Plan at RMA stage to monitor the delivery of AH and as a reconciliation mechanism at RMA stage
- Indexation to be applied at point of delivery to ensure affordability of intermediate products
- BLV and % profit inputs to be agreed for the purpose of establishing a baseline for future revisions

CO-LIVING

- Calculation/agreement of co-living equivalent AH sum and how it's intended to be used in this case.

BUILD TO RENT

- 35% affordable housing delivery
- Management covenant (single ownership, tenancies, etc.)

WHEELCHAIR USER DWELLINGS (condition

- 10% of residential units (all housing types) to be built to Part M4(3) Remaining 90% to Part M4(2).
- Details of marketing of the wheelchair dwellings to be agreed with the council.

PURPOSE BUILT STUDENT ACCOMMODATION (PBSA)

- Measures to secure 35% affordable student accommodation
- Retention of communal spaces for that purpose
- External open space freely available at no cost for all residents
- The use of accommodation secured for students
- A nominations agreement with one or more higher education institutions covering a majority of the student rooms, including all the affordable accommodation.

EMPLOYMENT RELATED ACCOMMODATION (ERA)

- 15% of all market housing
- Details of qualification, level of subsidy, mechanism for conversion from rental to purchase, minimum delivery requirements, timescales for offer

NON-RESIDENTIAL

- Minimum delivery of employment floorspace
- Minimum delivery of lab enabled floorspace (movable power units, minimum floor to ceiling heights, and appropriate air handling systems)

ECONOMIC DEVELOPMENT

- Financial contribution of £4,000,000; £6,000,000; £8,000,000; or £10,000,000 (depending on which of the affordable workspace provision

options A); B); C); or D) (below) are agreed), to support borough-wide economic development priorities, including:

- Wider economic development interventions aligned to Upstream London, including but not limited to:
 - Local employment and skills programmes for H&F residents and H&F students
 - Business growth, enterprise support and innovation initiatives delivered through Upstream London
 - Local procurement and supply chain development activities
 - Sector partnerships, careers engagement and pathways into jobs
- In-kind support to deliver local employment pathways, support local enterprise, and strengthen H&F's economic ecosystem, in the form of In-kind economic development benefits with a minimum total value of £1.7m, comprising:
 - Delivery of a Skills and Training Hub space, including rent-free provision and relocation costs
 - Developer-funded internships, apprenticeships and training activity (e.g., coordination, supervision, accreditation, materials)
 - Seed-funding, bursaries and targeted support for local start-ups and H&F young people and other residents' groups requiring support
 - Business engagement, outreach and supply chain development programmes
 - Any additional direct delivery costs associated with the Employment & Skills Strategy and Business Support programme

Phasing and Delivery

- The £6m financial contribution will be phased across the development, with payments linked to key trigger points to be agreed with LBHF.
- The £1.7m in-kind commitments will be delivered on a phase-by-phase basis through approved Employment, Skills and Business Strategy and corresponding Delivery Plans.
- Each Delivery Plan will confirm the in-kind activities, value, beneficiaries, and timing for that phase, ensuring the cumulative in-kind value of £1.7m is met or exceeded.
- Any in-kind value not delivered in a phase must be made up in subsequent phases or may be subject to a financial reconciliation mechanism agreed with LBHF.

Economic Development – Wider Benefits Package *(aligned with Upstream London and including but not limited to Employment and Skills, Business Support, Local Procurement)*

Employment and Skills (Construction and End-Use)

- A development-wide Employment Skills and Business Strategy to be prepared and approved prior to commencement, covering both construction and end-use phases and aligning with Upstream London.
- Phase-by-Phase Delivery Plans
 - A Delivery Plan for each phase to be prepared and agreed prior to commencement, setting out:
 - job roles, skill requirements expected during that phase.
 - the specific number and type of apprenticeships and placements to be delivered in that phase
 - delivery partners, recruitment processes and timelines.
 - how the phase contributes towards the cumulative Strategy outputs.
 - confirmation that all opportunities are aimed at and fulfilled by H&F residents and students enrolled in H&F schools/FE/HE institutions.
- Total Employment and Skills Outputs (across the full development)
 - At least 10% of the total number of people employed during the development are local (H&F) residents, including:
 - 200 apprenticeships
 - 500 paid work placements (minimum 6 weeks at London Living Wage)
 - 500 unpaid work placements (minimum 4 weeks)
 - all apprenticeships and placements will be provided exclusively to residents of the London Borough of Hammersmith and Fulham, and students of H&F schools, colleges, and universities.
 - At least 20% of the total number of people employed in the end use of the development to be local (H&F) residents.
 - Non-Compliance Contribution
 - A payment of £7,000 per apprenticeship or work placement not delivered, assessed at the end of each phase.
 - Monitoring
 - Quarterly monitoring during active delivery phases and annual reporting thereafter.
 - All in-kind and non-financial contributions (training, supervision, accreditation, equipment, etc.) must be itemised, evidenced, and monitored.
 - Reports must explicitly confirm and evidence H&F residency/H&F student status of all beneficiaries.
 - Local Procurement

- A minimum of 10% of total construction spend to be procured from H&F-based businesses.
- A Local Procurement Strategy, supported by phase-specific engagement plans, quarterly reporting of supplier location, value and sector, with only H&F-based suppliers counting towards the 10% commitment.

Upstream London Ambitions

- Developer participation in the Upstream London Pathway Bond or equivalent, including but not limited to employer outreach and careers engagement, recruitment and talent pipeline pathways for H&F residents and students.
- Business engagement and support activities, including but not limited to SME mentoring, business diagnostics, innovation and sector programmes, strengthening of the H&F start-up and business ecosystem.
- End-use occupiers to be encouraged (and required where feasible) to work with the Council and prioritise H&F residents for recruitment and H&F businesses for supply-chain opportunities.

Affordable Workspace Provision (AWS)

4 options:

- **Option A:** Provision of 5% of eligible commercial floorspace as Affordable Workspace, agreed specifically for Earl's Court and delivered in accordance with the principles of LBHF's Affordable Workspace SPD (2022), at 40% discount below market rent + £4,000,000 financial contribution to support borough-wide economic development priorities.
- **Option B:** Provision of 5% of eligible commercial floorspace as Affordable Workspace, as above, at 35% discount below market rent + £6,000,000 financial contribution to support borough-wide economic development priorities.
- **Option C:** Provision of 5% of eligible commercial floorspace as Affordable Workspace, as above, at 30% discount below market rent + £8,000,000 financial contribution to support borough-wide economic development priorities.
- **Option D:** Provision of 5% of eligible commercial floorspace as Affordable Workspace, as above, at 25% discount below market rent + £10,000,000 financial contribution to support borough-wide economic development priorities

In each option:

- The Affordable Workspace to be delivered fitted to Category A standard, ready for immediate occupation.
- Affordable Workspace to be secured in perpetuity through the S106 Agreement.
- Overall Affordable Workspace Strategy
 - An overarching AWS Strategy to be prepared and approved by LBHF prior to commencement of any phase, setting out:
 - Total AWS quantum and discount across the masterplan.
 - Target outcomes supporting start-ups, SMEs, innovation, and social value.
 - Tenant eligibility criteria and allocation principles.
 - Management, governance, and monitoring arrangements.
 - Integration of any incubator/desks or innovation space with Upstream London.
- Phase-Specific AWS Delivery Plans
 - A Delivery Plan to be prepared and approved for each phase prior to commencement, detailing:
 - Exact AWS floorspace to be delivered in that phase.
 - Timing, specification, handover and occupation arrangements.
 - Indicative tenant mix or priority sectors.
 - Phase-specific monitoring, reporting, and valuation of in-kind contributions.
- Minimum Benefit/Cost Guarantee

The total AWS value, including delivery, fit out and in-kind contributions (£18,385,818) is the minimum guaranteed benefit to LBHF.

 - These costs and values cannot be reduced without prior written agreement from the Council.
 - All in-kind and non-financial contributions will be monitored, evidenced, and reconciled by LBHF to ensure delivery meets agreed values and outcomes.

Incubator Office Space

- Office incubator space (minimum floor area 2,500sqm) to be delivered as a long-term meanwhile use, contemporaneously with Phase 1 (but on land within Phase 4); and thereafter in purpose-built facilities elsewhere on the EC site, in either the Empress Place Innovation/Creation area or the West Kensington Innovation Cluster (both in H&F).
- The incubator space will deliver a range of employment floorspace provision suitable (in particular) for early-stage startups and scaleups operating within Climate Tech (or Green Tech) and other emerging industries; and provide access to an innovation ecosystem and spaces in which to establish and

grow; and support the delivery of Development Plan policies and the aspirations of Upstream London.

- These spaces could take the form of workshops and labs, with ancillary events spaces. The “meanwhile” incubator space will be secured by way of an appropriate legal mechanism securing delivery (including phasing and operational strategy) and fit out, whilst the permanent provision will be secured by way of a subsequent RMA relating to the relevant Development Zone.
- Submission of reconciliation statements for co-working space enabling start up and scale up businesses, small affordable studios and workshops, and mixed lab/office/research and development space

EMPLOYMENT FLOORSPACE

- Minimum delivery of employment floorspace (sqm) across early and late phases

RETAIL

- Minimum delivery of retail floorspace

PHASING

- Delivery of Development Zone I prior to occupation of Development Zone H

CHILDREN & EDUCATION OPPORTUNITIES

- Financial contribution of £3,600,000 (linked to residential delivery)
- ECPL funded outreach programmes with local schools
- Provision of an on-site early years’ nursery (not less than 340m2) prior to occupation of 1500 dwelling
- Development Zone U RMA - reconciliation statement for education and early years to inform delivery of provision

COMMUNITY, CULTURE & SOCIAL INFRASTRUCTURE

- Financial contribution of up to £3,500,000 (including £415,000 towards health for early phases and, in event health facility is not provided on site, a cash contribution for the later phases to be calculated on submission of each RMA up to a max £3, 500,000).
- ECPL to build and fit-out new Community Centre delivered within WB05-T2
- Financial contribution of £125,000 towards improvements to Gibbs Green Community Centre, in the event that the proposed Community Centre is not delivered before the occupation of the residential units in WBO5
- Minimum delivery of community floorspace and public toilets within detailed phases prior to occupation
- ECPL to provide and fit-out new cultural venues delivered on-site
- MUGA improvements and relocation of existing play equipment

OPEN SPACE & PLAY SPACE

- Phased provision of on-site public open space in accordance with agreed drawings and specifications.
- Provision of children's and young people's play and recreation space in accordance with agreed standards
- General public to be granted access to the public open space in accordance with agreed terms to be set out in the Section 106 Agreement.
- Each application for Reserved Matters approval in respect of a Development Plot that includes areas of proposed landscaping or public realm works to include a Landscaping & Public Realm Specification and management plan. Supporting documents shall include details of all species within the planting schedule, additional ecological initiatives such as, but not limited to, native species planting, bird and bat boxes and log piles, and management responsibilities and maintenance schedules for all landscape areas. The planting schedule must not include any invasives, such as those included on the London Invasive Species Initiative. The use of herbicides and pesticides should be entirely avoided with exception to tackling invasive species. The landscaping and public realm specification and management plan shall be implemented in accordance with the approved details and shall thereafter be permanently retained in this form.

ENVIRONMENT

- Carbon Off-Set Payment (Detailed Plots only) of £3,151,280 (+ top-up payment post construction in the event of underperformance)
- Carbon Off-Set Payments (Outline Plots) – further CO2 offset payments for the outline phases to be calculated/paid at RMA stage in accordance with our local tariff rate.
- Monitoring Infrastructure – details of proposed LBD monitoring equipment to be installed and monitored by ECDC

HIGHWAYS & TRANSPORT

- Financial contribution of £2,000,000 - towards CPZ reviews, car traffic neighbourhood improvements, walking/cycling improvements, and related matters.
- Financial contribution of £2,000,000 towards community safety / CCTV (comprising £100,000 p/a over 20 years)
- Financial contribution of £1,105,000 (in the form of a contingency fund to allow for delivery of Healthy Streets improvements)
- £225,000 – Travel Planning & Transport Steering Group (£12,500 a year, for 18-years, to cover cost of TSG representative)
- Requirement to enter s278 agreement(s) with the council in relation to highway improvements works to mitigate the impacts of the development (including, but not limited to, improvements to the Lillie Rd/North End Road

roundabout; Beaumont Avenue parking; and North End Road/Beaumont Avenue highway junction).

- West Kensington Station Upgrade - £10,000,000 contribution to TfL (ECDC contributing £20m to TfL towards improvement to West Kensington + West Brompton stations; assumption is that TfL will allocate this roughly 50:50 between the 2 stations).
- Buses Improvements to bus stop infrastructure and bus contingency fund (S278 works).
- Cycling – details of road improvements and bus contingency fund
- Car permit free clauses prohibiting occupiers and businesses (apart from blue badge holders) from applying for or holding on-street car parking permits to park in Controlled Parking Zones
- Travel Plans to be submitted and approved in relation to each phase of the Development.

MONITORING

- Financial contribution of £4,000,000 (over life of development; capped at £200k pa over 20 years) towards:
 - monitoring obligations contained in the Section 106 Agreement.
 - monitoring environmental impacts; and
 - monitoring of other development impacts.

LEGAL COSTS

- Applicant's undertaking to cover the council's legal costs in relation to the drafting of the s106 agreement.

19.12 Officers request delegated authority to continue to negotiate and agree the terms of the proposed agreement summarised in Paragraph 19.11, to be entered into under Section 106 of the Town and Country Planning Act 1990 (and where necessary pursuant to any other enabling powers and Section 278 of the Highways Act 1980).

20 CONCLUSION

20.1. In considering planning applications, the Local Planning Authority needs to consider whether or not the proposed development accords with the development plan as a whole and any other material considerations. The NPPF explains that planning applications that accord with the development plan should be approved without delay.

20.2. In the assessment of the application regard has been given to the NPPF, London Plan, and Local Plan policies as well as guidance. The proposal scheme represents an opportunity to deliver the regeneration of the Earls Court site, which forms part of the Earls Court and West Kensington Opportunity Area, (also

part of the wider Fulham Regeneration Area), in accordance with the London Plan and the Council's Local Plan policies.

20.3. The masterplan approach to the redevelopment of the wider site, encompassing land in RKBC too, offers a unique opportunity to reconnect and improve permeability, connectivity and legibility of the site in the context of its local surroundings. This will make a significant contribution to promoting active travel and healthy lifestyles.

20.4. Proposals would optimise the opportunity of the site, bringing forward a mix of new housing, commercial, and community/cultural uses, alongside new and significant areas of public spaces, whilst creating a new innovation hub for emerging industries and cultural destination in West London.

Housing

20.5. The development would deliver up to 3,900 new homes across both boroughs, with up to 2,500 homes (and minimum 2,000 homes) in LBHF. The new homes include the provision of 35% affordable housing (by habitable room) across the site. A range of housing is proposed including private for sale, build to rent, social rented, shared ownership & intermediate for rent and Employment Related Accommodation (ERA), and tenure mix (40% Social Rent and 60% Intermediate). ERA would be connected to the commercial floorspace to be provided on the Site and in addition to the 35% affordable housing provision.

20.6. In addition, up to 1,500 new student rooms would be provided in LBHF (696 rooms in the detailed component of Phase 1). The student housing would include 35% affordable bedrooms. The proposed development would potentially include other forms of residential accommodation, including co-living, that will make a significant contribution to housing delivery in the borough.

Land use and Employment

20.7. The proposal seeks a mix use development delivering a range of complementary land uses. The proposal seeks to deliver a new employment district on the site offering a range of business and employment opportunities and range of businesses. The proposal includes a significant amount of office floorspace - up to 250,000sqm (up to 155,000sqm within LBHF) to be delivered by 2043, which is estimated to accommodate up to 14,500 direct jobs (FTE). Workspaces across the site could come forward in a range of forms, types and scales ranging from modern large scale office space to smaller workspace and purpose-built R&D floorspace (including a variety of lab space). This would attract and accommodate business of all sizes, including small-medium enterprises, creative industries, corporations and logistics operators, some of it as affordable workspace. An incubator hub will be delivered as part of the employment

floorspace, which will provide a bespoke environment for startups and growing businesses within the Green Tech, Climate Tech and other emerging innovation industries.

20.8. The construction phases will also ensure that employment, skills and training opportunities come forward. It is estimated that there will be approximately 1,150 full-time construction jobs created over the estimated 20-year build programme. Subject to engagement with the Council's Economic Development team, the development will provide opportunities for residents in the borough to gain skills and training opportunities in the construction sector over a long period of time.

20.9. The proposal includes the provision of retail and flexible commercial floorspace which will support and strengthen opportunities in the borough to meet the needs of growing businesses and local communities, creating a vibrant community. These town centre uses will sit alongside cultural, leisure, hotel and other uses, which will contribute towards positive place-making for residents, employees and visitors. Potential negative impacts on existing town centres will be minimised through legal obligations requiring ongoing assessment of impacts as the development is built out.

20.10. The development will also provide a fully equipped community hub and community hall, along with a reconfigured and upgraded MUGA and outdoor gym and a children's nursery.

20.11. Ecology

20.12. The landscaping strategy seeks to increase access into and throughout the proposed site with multifunctional social, economic and environmental sustainability underpinning the design. The proposal meets or exceeds London Plan Policies in relation to policies on Urban Greening and Biodiversity, and access to nature.

20.13. Obligations have been secured to ensure best ecological practice, enhance biodiversity and deliver greening policies, alongside ensuring delivery of Biodiversity Net Gain commitment (a site wide commitment of 85%), including reconciliation on a phase-by-phase basis. Obligations to ensure delivery of Urban Greening Factor beyond the current baseline to >0.4 on a site-wide basis have been sought, including reconciliation on a phase-by-phase basis.

Accessibility and Inclusivity

20.14. Despite the significant change in levels across the site, officers consider the proposals have embraced inclusivity as part of the design proposals, acknowledging the diversity and needs of all groups, including the elderly and persons with physical or sensory disabilities, creating a place for all.

20.15. Overall, the proposed development would deliver a high quality, accessible, inclusive and sustainable place in accordance with the relevant planning policies and inclusive design principles. The proposal has been designed to ensure that the site meets the highest standards of inclusive design in line with London Plan and Local Plan Policies.

20.16. Amenity considerations

20.17. A comprehensive daylight, sunlight and overshadowing assessment has been undertaken to assess the potential impacts of the development on existing properties in the vicinity of the site. The assessment demonstrates that while a relatively large number of neighbouring properties and open spaces would experience very little or no tangible impact to existing levels of daylight, sunlight or overshadowing, some close to the development boundaries would be adversely affected. Given the site's designation in an Opportunity Area, and the fact the site is almost a cleared site in a dense urban environment, it is considered reasonable for 'Alternative Targets' to be set for the assessment of this site.

20.18. Overall, the proposed development demonstrates a high level of compliance with daylight and sunlight standards, particularly given the constraints of the site. Where shortfalls occur, they are minor, well-justified by design intent, and mitigated by the provision of high-quality internal layouts and access to well-lit communal amenity spaces. The scheme is therefore considered to provide an acceptable standard of residential amenity for future occupiers.

Highways and Transport

20.19. The proposal, through its well-considered public realm, will result in improvements to the accessibility and permeability of this part of the borough and its neighbours, and will deliver active travel benefits through new pedestrian and cycle routes.

20.20. The proposal will provide contributions towards the delivery of step free access to West Brompton and West Kensington stations, which will improve the accessibility and inclusivity of this public transport infrastructure.

20.21. Better interchange facilities at Lillie Road bus layover are incorporated into the development, allowing boarding as well as alighting from vehicles.

Environmental considerations

20.22. The site will be remediated in respect of contaminated land.

Design, Heritage, and Townscape

- 20.23. The configuration, design and materiality of the proposed development is thought to be well considered and would provide a high-quality development which would enhance the appearance of the local area, reinforcing the legibility and identity of the Earls Court site in the wider locality.
- 20.24. Having undertaken an assessment of the scheme against the tall building frameworks of London Plan Policy D9 and Local Plan Policy DC3, officers conclude that the design of the scheme, (particularly the Phase 1 development), would represent a scheme of the highest-quality design. Whilst the development would result in significant changes to townscape views/receptors, these changes are considered neutral to beneficial overall, (notwithstanding the localised adverse impact upon the cluster of Victorian developments to the east of the site, within RBKC), and would not have an unacceptably disruptive and harmful impact upon the skyline.
- 20.25. Due to the scale of the development, the proposal would result in harms to the settings of several heritage assets within the London Borough of Hammersmith & Fulham and the adjoining Royal Borough of Kensington and Chelsea. In all instances these harms are considered to fall within the range of less than substantial harm. Considerable importance and weight must be given in the planning balance to these harms to the settings of heritage assets, even if these harms are considered to be less than substantial. Nevertheless, officers are satisfied that the overall character and significance of the settings of all these heritage assets would be preserved either entirely or substantially, notwithstanding these harms.
- 20.26. The degree of impact on assets in both boroughs has therefore been reviewed and assessed by both the applicant and both boroughs. The development would have some intervisibility in localised townscape views. However, the impact upon these views would be within the range of minor adverse/neutral to beneficial overall.
- 20.27. As listed in earlier sections of the report there are some heritage benefits arising from the proposals, however these benefits in their own right would not outweigh the less than substantial harms to the settings of adjacent heritage assets identified by officers and considering the necessary NPPF tests. These benefits would be reduced further in the event that it is not possible to retain the buildings within Empress Place, and if the TfL depot land is not brought forward for redevelopment with the attendant benefits to the Baron's Court conservation area. Further discussion of this and summary of the wider public benefits of the scheme are referenced below.

Summary of Public Benefits

20.28. As stated above, there are a number of significant public benefits that will be delivered by the scheme including:

- Delivery of up to 2,500 homes (and minimum 2,000 homes) in LBHF; including the provision of 35% affordable housing (by habitable room) across the site.
- Delivery of a new employment district on the site offering a range of business and employment opportunities and range of businesses. Up to 155,000 sqm of high-quality employment floorspace suitable for a variety of occupiers, including an incubation space, to be delivered by 2043, which is estimated to accommodate up to 14,500 direct jobs (FTE).
- Approximately an average 1,150 full-time construction jobs created over the estimated 20-year build programme.
- Significant new public spaces and improved pedestrian links/connections to the site and key public transport infrastructure.
- The proposal meets or exceeds London Plan Policies in relation to policies on Urban Greening and Biodiversity, and access to nature.
- Delivery of upgrade works to local London Underground and Overground stations

Balance

20.29. Considering the heritage impacts of the development, taking the public benefits of the scheme into consideration, officers consider that it is appropriate to grant planning permission, having had special regard to the desirability of preserving the settings of relevant listed buildings (section 66, Planning (Listed Buildings and Conservation Areas) Act 1990), and having paid special attention to the desirability of preserving or enhancing the character or appearance of relevant conservation areas (section 72, the 1990 Act).

20.30. All harms that have been identified represent departures from certain aspects of the Development Plan. Notwithstanding these departures, when viewed in the round and recognising that the Development Plan policies may pull in different directions, there are no material considerations which indicate a decision otherwise in accordance with the Development Plan.

20.31. The proposed development is therefore considered to accord with the Development Plan when considered as a whole. There are other important material considerations that support the grant of planning permission. As summarised above, these include the delivery of a number of significant public benefits and the acceptability of the proposed development when assessed on a systematic basis against relevant factors identified in policy.

20.32. Accordingly, it is recommended that the proposed development be granted planning permission subject to the conditions listed and the completion of s106 and no contrary direction from the Mayor of London.

APPENDICES (BACKGROUND PAPERS)

- **Appendix A:** Documents and Drawings for Approval / Background Papers
- **Appendix B:** List of Consultation Responses (Consultee/Neighbour Comments)
- **Appendix C:** List of Relevant Policies

Appendix A: Documents and Drawings for Approval / Background Papers

Documents for Approval (OUTLINE COMPONENT)

- **Development Specification** Revision 01 – prepared by ECDC Planning (August 2025)
- **Parameter Plans** Revision 01 – prepared by Hawkins\Brown & Studio Egret West (July 2025)
- **Design Code** Revision. 01 – prepared Hawkins\Brown & Studio Egret West (July 2025)

Drawings for Approval (DETAILED COMPONENT)

APPROVED PLANS
Site Location Plan
ECD-SW-ZZ-HBS-07-XX-DR-A-102224 -P02– Site Location Plan (LBHF)
Parameter Plans
001 / P02 – Site Location Plan
002 / P02 – Demolition Plan
003 / P02 – Existing Site Levels
004 / P02 – Development Zones, Maximum Building Lines and Public Realm
005 / P02 – Proposed Plot Plan
006 / P02 – Proposed Maximum Heights
007 / P02 – Proposed Public Realm Typologies
008 / P02 – Proposed Access and Movement
009 / P02 – Proposed Site Levels Ground Floor

010 / P02 – Proposed Site Levels below Ground Floor
011 / P02 – Proposed Land Use Ground Level
012 / P02 – Proposed Land Use Upper Levels
013 / P02 – Proposed Land Use below Ground Floor
014 / P02 – Urban Design Plan
Detailed Component: WB03
ECD-WB03-P1-SER-07-ZZ-DR-A-002205 – 01 - WB03 Podium Plans
ECD-WB03-T1-SER-07-ZZ-DR-A-002206 – 01 - WB03 Floor Plans Levels 2 - 28
ECD-WB03-T1-SER-07-ZZ-DR-A-002207 – 01 - WB03 Floor Plans Levels 29 - Roof
ECD-WB03-ZZ-SER-07-ZZ-DR-A-002220 – 01 - WB03 North-East Elevation
ECD-WB03-ZZ-SER-07-ZZ-DR-A-002221 – 01 - WB03 North-West Elevation
ECD-WB03-ZZ-SER-07-ZZ-DR-A-002222 – 01 - WB03 South-East Elevation
ECD-WB03-ZZ-SER-07-ZZ-DR-A-002223 – 01 - WB03 South-West Elevation
ECD-WB03-ZZ-SER-07-ZZ-DR-A-002301 – 01 - WB03 Section 1
ECD-WB03-ZZ-SER-07-ZZ-DR-A-002302 – 01 - WB03 Section 2
ECD-WB03-P1-SER-XX-ZZ-DR-A-021300 – Illustrative WB03 Podium Bay Study
ECD-WB03-P1-SER-XX-ZZ-DRA-021301 – Illustrative WB03 Resi Entrance Lobby Bay Study
ECD-WB03-P1-SER-XX-ZZ-DR-A-021302 - Illustrative WB03 Cluster Kitchen Bay Study
ECD-WB03-P1-SER-XX-ZZ-DR-A-021303 - Illustrative WB03 Typical Studio Bay Study
ECD-WB03-P1-SER-XX-ZZ-DR-A-021304 - Illustrative WB03 Top of the Building Bay Study
Detailed Component: WB04
ECD-WB04-T1-SHR-07-ZZ-DR-A-102223 – 01 - WB04 Proposed South-West Elevation
ECD-WB04-T1-SHR-07-ZZ-DR-A-102222 – 01 - WB04 Proposed South-East Elevation

ECD-WB04-T1-SHR-07-ZZ-DR-A-102260 – 01 - WB04 Proposed Cross Section 01
ECD-WB04-T1-SHR-07-ZZ-DR-A-102261 – 01 - WB04 Proposed Cross Section 02
ECD-WB04-T1-SHR-07-ZZ-DR-A-102221- 01 - WB04 Proposed North-West Elevation
ECD-WB04-T1-SHR-07-ZZ-DR-A-102220 – 01 - WB04 Proposed North-East Elevation
ECD-WB04-T1-SHR-07-ZZ-DR-A-102204 – 01 - WB04 Proposed Floorplates Levels 33 to 40
ECD-WB04-T1-SHR-07-ZZ-DR-A-102205 – 01 - WB04 Proposed Floorplates Level 41 to Roof
ECD-WB04-P1-SHR-07-ZZ-DR-A-102211 – 01 - WB04 Proposed Podium South-West Elevations
ECD-WB04-P1-SHR-07-ZZ-DR-A-102210 – 01 - WB04 Proposed Podium North-East and North-West Elevations
ECD-WB04-P1-SHR-07-ZZ-DR-A-102262 – 01 - WB04 Proposed Podium Sections
ECD-WB04-P1-SHR-07-LG-DR-A-102199 – 01 - WB04 Proposed Lower Ground Floor Plan
ECD-WB04-T1-SHR-07-ZZ-DR-A-102203 – 01 - WB04 Proposed Floorplates Level 2 to 32
ECD-WB04-P1-SHR-07-GF-DR-A-102200 – 01 - WB04 Proposed Ground Floor Plan
ECD-WB04-P1-SHR-07-01-DR-A-102201 – 01 - WB04 Proposed 1st Floor Plan
ECD-WB04-P1-SHR-07-02-DR-A-102202 – 01 - WB04 Proposed 2nd Floor Plan
ECD-WB04-P1-SHR-07-B1-DR-A-102198 – 01 - WB04 Proposed Podium Basement Floor Plan
ECD-WB04-P1-SHR-07-B1-DR-A-102319 – LBHF Detailed Component WB04 Entrance Lobby Bay Study
ECD-WB04-P1-SHR-07-B1-DR-A-102320 – LBHF Detailed Component WB04 Bay Study Podium
ECD-WB04-P1-SHR-07-B1-DR-A-102321 – LBHF Detailed Component WB04 Bay Study Typical
ECD-WB04-P1-SHR-07-B1-DR-A-102322 – LBHF Detailed Component WB04 Detailed Component Bay Study Top

Detailed Component: WB05
ECD-WB05-ZZ-DRM-07-RF-DR-A-020120 – 01 - WB05 Proposed Roof Floor Plan
ECD-WB05-ZZ-DRM-07-ZZ-DR-A-020110 – 01 - WB05 Proposed Typical Upper Floor Plan
ECD-WB05-T2-DRM-07-ZZ-DR-A-040112 – 01 - WB05 Proposed T2 North and South Elevations
ECD-WB05-T2-DRM-07-ZZ-DR-A-040113 – 01 - WB05 Proposed T2 East and West Elevations
ECD-WB05-ZZ-DRM-07-ZZ-DR-A-020103 – 01 - WB05 Proposed Typical Lower Floor Plan
ECD-WB05-ZZ-DRM-07-ZZ-DR-A-030100 – 01 - WB05 Proposed Site Section
ECD-WB05-ZZ-DRM-07-ZZ-DR-A-040101 – 01 - WB05 Proposed South-East Site Elevation
ECD-WB05-ZZ-DRM-07-ZZ-DR-A-040100 – 01 - WB05 Proposed North-West Site Elevation
ECD-WB05-ZZ-DRM-07-M1-DR-A-020121 – 01 - WB05 Proposed Mezzanine Floor Plan
ECD-WB05-ZZ-DRM-07-GF-DR-A-020100 – 01 - WB05 Proposed Ground Floor Plan
ECD-WB05-ZZ-DRM-07-16-DR-A-020116 – 01 - WB05 Proposed Sixteenth Floor Plan
ECD-WB05-ZZ-DRM-07-15-DR-A-020115 – 01 - WB05 Proposed Fifteenth Floor Plan
ECD-WB05-ZZ-DRM-07-14-DR-A-020114 – 01 - WB05 Proposed Fourteenth Floor Plan
ECD-WB05-ZZ-DRM-07-09-DR-A-020109 – 01 - WB05 Proposed Ninth Floor Plan
ECD-WB05-ZZ-DRM-07-02-DR-A-020102 – 01 - WB05 Proposed Second Floor Plan
ECD-WB05-ZZ-DRM-07-01-DR-A-020101 – 01 - WB05 Proposed First Floor Plan
ECD-WB05-T1-DRM-07-ZZ-DR-A-040111 – 01 - WB05 Proposed T1 North-East and South-West Elevations
ECD-WB05-T1-DRM-07-ZZ-DR-A-040110 – 01 - WB05 Proposed T1 North-West and South-East Elevations

ECD-WB05-T1-DRM-07-ZZ-DR-A-040122 –Illustrative WB05-T1 Bay Study Base
ECD-WB05-T1-DRM-07-ZZ-DR-A-040123 –Illustrative WB05-T1 Bay Study Middle
ECD-WB05-T1-DRM-07-ZZ-DR-A-040124 –Illustrative WB05-T1 Bay Study Top
ECD-WB05-T1-DRM-07-ZZ-DR-A-040125 –Illustrative WB05-T2 Bay Study Base
ECD-WB05-T1-DRM-07-ZZ-DR-A-040126 –Illustrative WB05-T2 Bay Study Top
LBHF Detailed Component: Combined Drawings
ECD-WBZZ-ZZ-SHR-07-GF-DR-A-102001 – 01 - LBHF Detailed Component Ground Floor Location Plan
ECD-WBZZ-ZZ-SHR-07-RF-DR-A-102002 – 01 – LBHF Detailed Component Roof Location Plan
LBHF Detailed Component: Landscaping
ECD-WB03-P1-LDA-07-02-DR-L-000011 – 01 - WB03 Podium General Arrangement
ECD-WB03-T1-LDA-07-ZZ-DR-L-000002 – 01 - WB03 Terraces General Arrangement
ECD-WB04-T1-LDA-07-39-DR-L-000005 – 01 - WB04 T1 L39 Terraces General Arrangement
ECD-WB04-P1-LDA-07-02-DR-L-000012 – 01 - WB04 Podium General Arrangement
ECD-WB04-T1-LDA-07-33-DR-L-000003 – 01 - WB04 T1 L33 Terraces General Arrangement
ECD-WB04-T1-LDA-07-35-DR-L-000004 – 01 - WB04 T1 L35 Terraces General Arrangement
ECD-WB05-P1-LDA-07-GF-DR-L-000006 – 01 - WB05 Ground Floor General Arrangement
ECD-WB05-P1-LDA-07-01-DR-L-000007 – 01 - WB05 1st Floor General Arrangement
Drawings: For Information Only
ECD-SW-ZZ-HBS-07-XX-DR-A104000 – Existing Buildings Plan
ECD-SW-ZZ-HBS-07-XX-DR-A-304001 – Existing Site Section 01
ECD-SW-ZZ-HBS-07-XX-DR-A-304002 – Existing Site Section 02

ECD-WBZZ-ZZ-SHR-07-01-DR-A-102101 – 01 - WB03 WB04 WB05 First Floor Plan
ECD-WBZZ-ZZ-SHR-07-02-DR-A-102102 – 01 - WB03 WB04 WB05 Second Floor Plan
ECD-WBZZ-ZZ-SHR-07-GF-DR-A-102100 – 01 - WB03 WB04 WB05 Ground Floor Plan
ECD-WBZZ-ZZ-SHR-07-LG-DR-A-102099 – 01 - WB03 WB04 WB05 Lower Ground Floor Plan
ECD-WBZZ-ZZ-SHR-07-RF-DR-A-102105 – 01 - WB03 WB04 WB05 Roof Plan
ECD-WBZZ-ZZ-SHR-07-ZZ-DR-A-102103 – 01 - WB03 WB04 WB05 Typical Lower Floor Plan
ECD-WBZZ-ZZ-SHR-07-ZZ-DR-A-102104 – 01 - WB03 WB04 WB05 Typical Upper Floor Plan
ECD-WBZZ-ZZ-SHR-07-ZZ-DR-A-102110 – 01 - WB03 WB04 WB05 North-East Elevation
ECD-WBZZ-ZZ-SHR-07-ZZ-DR-A-102111 – 01 - WB03 WB04 WB05 North-West Elevation
ECD-WBZZ-ZZ-SHR-07-ZZ-DR-A-102112 – 01 - WB03 WB04 WB05 South-West Elevation
ECD-WBZZ-ZZ-SHR-07-ZZ-DR-A-102113 – 01 - WB03 WB04 WB05 South-East Elevation
ECD-WBZZ-P1-LDA-07-02-DR-L-000001 – 01 - WB03 WB04 Podium General Arrangement

OTHER BACKGROUND PAPERS

ORIGINAL SUBMISSION (JULY 2024)

- Completed Application Form
- Additional CIL Information Form
- Architectural Drawings and Drawing Schedule
- Application User Guide – prepared by ECDC (July 2024)
- Cover Letter – prepared by the Earls Court Partnership Limited dated 30 July 2024
- Planning Statement - prepared by ECDC Planning (July 2024)

- Illustrative Masterplan Drawings - prepared by Hawkins\Brown & Studio Egret West (July 2024)
- Design & Access Statement Volume 1: Outline Component – prepared by Hawkins\Brown & Studio Egret West (July 2024)
- Design & Access Statement Volume 3: LBHF Detailed Component – prepared by Sheppard Robson/ Serie/ dRMM (July 2024)
- Development Specification – prepared by ECDC Planning (July 2024)
- Design Code – prepared Hawkins\Brown & Studio Egret West (July 2024)
- Parameter Plans - prepared by Hawkins\Brown & Studio Egret West (July 2024)
- Indicative Phasing Strategy - prepared by Hawkins\Brown & Studio Egret West (July 2024)
- Template Reconciliation Statement - prepared by A-Project / ECDC Planning (July 2024)
- Air Quality Positive Statement – prepared by Ramboll (July 2024)
- Affordable Workspace Strategy - prepared by Quod (July 2024)
- Arboricultural Impact Assessment – prepared by Crown Tree Consultancy (July 2024)
- Biodiversity Net Gain Assessment – prepared by Ramboll (July 2024)
- Biodiversity Net Gain Metrics Earls Court Scenario 3 – Early Phases LBHF Toolkit
- Biodiversity Net Gain Metrics Earls Court Scenario 6 – All Phases LBHF Toolkit_V3
- Urban Greening Factor Plan – prepared by Hawkins\Brown & Studio Egret West (July 2024)
- MP03 Illustrative Urban Greening Factor Plan – prepared by Hawkins\Brown (July 2024)
- MP03 Illustrative UGF Categories Per Plot – prepared by Hawkins\Brown (July 2024)
- MP03 Urban Greening Factor Plan with Maximum Building Line – prepared by Hawkins\Brown (July 2024)
- MP03 Urban Greening Factor Plan Early Phases with Maximum Building Line - prepared by Hawkins\Brown (July 2024)
- MP03 Proposed Trees with Maximum Building Line – prepared by Hawkins\Brown (July 2024)
- MP03 Proposed Trees Early Phases with Maximum Building Line – prepared by Hawkins\Brown (July 2024)
- MP03 Illustrative UGF Categories per plot – prepared by Hawkins Brown (July 2024)
- Commercial Strategy – prepared by ECDC/JLL & Knight Frank (July 2024)
- Cultural Strategy - prepared by ECDC/Sound Diplomacy (July 2024)
- Retail Strategy – prepared by JLL (July 2024)
- Student Needs Assessment - prepared by Knight Frank (July 2024)
- Economic Inclusion Statement - prepared by SQW (July 2024)
- Lillie Bridge Depot Preliminary Relocation Statement - prepared by Places for London/TfL (July 2024)
- Temporary Uses Strategy – prepared by ECDC/ Hawkins\Brown & Studio Egret West (July 2024)
- Town Centre Impact Assessment – prepared by ECDC Planning (July 2024)

- Construction Site Waste Management Plan – prepared by Turner & Townsend (July 2024)
- Energy Strategy – prepared by Hoare Lea (July 2024)
- Equality Statement, prepared by Quod (July 2024)
- Estate Management Framework - prepared by Rendall & Rittner (July 2024)
- Financial Viability Assessment (LBHF) – prepared by Quod (July 2024)
- Assessment & Drainage Strategy - prepared by WSP (July 2024)
- Drainage Statement WB03, WB04 & WB05 - prepared by Walsh (July 2024)
- Integrated Water Management Strategy – prepared by WSP (June 2024)
- Fire Strategy - prepared by Hoare Lea (July 2024)
- Fire Statement WB03 - prepared by OFR (July 2024)
- Fire Statement WB04 - prepared by OFR (July 2024)
- Fire Statement WB05 - prepared by OFR (July 2024)
- Gateway 1 FormWB03, WB04 & WB05 – prepared by OFR (July 2024)
- Housing Statement - prepared by QUOD (July 2024)
- Public Benefits Statement - prepared by Quod (July 2024)
- Impacts on Neighbours: Contextual Daylight, Sunlight & Overshadowing Report – prepared by GIA (July 2024)
- Amenity within the Site: Internal Daylight, Sunlight & Overshadowing Assessment WB03, WB04 & WB05 Revision 01 – prepared by GIA (July 2024)
- Amenity within the Site: Internal Daylight, Sunlight & Overshadowing Assessment - prepared by GIA (July 2024)
- Overheating Risk and Thermal Comfort Strategy - prepared by Hoare Lea (July 2024)
- Sustainability Statement - WB03 – prepared by Hoare Lea (July 2024)
- Sustainability Statement - WB04 - prepared by Hoare Lea (July 2024)
- Sustainability Statement - WB05 - prepared by Hoare Lea (July 2024)
- Sustainability Strategy – prepared by Hoare Lea (July 2024)
- Security Planning Report - prepared by Hoare Lea (July 2024)
- Social Value Statement - prepared by RealWorth (July 2024)
- Statement of Community Involvement – prepared by LCA/ECDC (July 2024)
- Transport Assessment - prepared by WSP (July 2024)
- Draft Delivery & Servicing Plan WB03, WB04 & WB05 - prepared by WSP (July 2024)
- Draft Operational Waste Management Strategy WB03, WB04 & WB05 - prepared by WSP (July 2024)
- Draft Parking Design & Management Plan WB03, WB04 & WB05 - prepared by WSP (July 2024)
- Draft Travel Plan WB03, WB04 & WB05 - prepared by WSP (July 2024)
- Framework Delivery & Servicing Plan - prepared by WSP (July 2024)
- Framework Parking Design and Management Plan - prepared by WSP (July 2024)
- Framework Travel Plan - prepared by WSP (July 2024)
- Framework Basement Impact Assessment - prepared by WSP (July 2024)
- Framework Construction Management Plan - prepared by Turner & Townsend (July 2024)
- Framework Construction Traffic Logistics Plan - prepared by Turner & Townsend (July 2024)

- Operational Waste Management Strategy - prepared by WSP (July 2024)
- Construction Management Statement WB03, WB04 & WB05 – prepared by Walsh – (July 2024)
- Whole Life Carbon and Circular Economy Strategy – prepared by Hoare Lea (July 2024)
- WB03 04 PODIUM GLA_CIRCULAR_ECONOMY_STATEMENTS
- WB04 GLA_CIRCULAR_ECONOMY_STATEMENTS
- WB05 GLA_CIRCULAR_ECONOMY_STATEMENTS
- LHBF DETAILED GLA_WLCA_ASSESSMENT_TEMPLATE
- OUTLINE APPLICATION AREA ONLY GLA_WLCA_ASSESSMENT
- GLA Circular Economy Statement – Outline Application Area Only
- WB03 GLA Circular Economy Statement – Application Area Only
- WB03_PART_L_2021_GLA_Carbon Emission Reporting Spreadsheet
- WB04_PART_L_2021_GLA_Carbon Emission Reporting Spreadsheet
- WB05_PART_L_2021_GLA_Carbon Emission Reporting Spreadsheet
- Engineering Services: Generator Schedule – Complete Development prepared by Hoare Lea
- Utilities & Services Infrastructure Strategy – prepared Hoare Lea (July 2024)
- Ventilation and Extraction Statement – prepared by ECDC Planning (July 2024)
- ECDC Letter dated 4 September 2024: Ministerial Statement of 30th July 2024 from the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government
- Imperial College London Letter dated 4 July 2024
- Confidential Masterplan Security Strategy – prepared by Hoare Lea (July 2024)
- Confidential Security Risk Assessment – prepared by Hoare Lea (July 2024)
- Existing Building Plan – prepared by Hawkins\Brown
- Existing Site Sections 01 – prepared by Hawkins\Brown
- Existing Site Sections 02 – prepared by Hawkins\Brown

Environmental Statement (July 2024) prepared by Ramboll (July 2024)

Environmental Statement Volume 1: Main Environmental Statement Report

- Chapter 1 Introduction
- Chapter 2 EIA Process and Methodology
- Chapter 3 Alternatives and Design Evolution
- Chapter 4 Proposed Development Description
- Chapter 5 Demolition and Construction Description
- Chapter 6 Archaeology
- Chapter 7 Socio Economics
- Chapter 8 Human Health
- Chapter 9 Transport and Accessibility
- Chapter 10 Air Quality
- Chapter 11 Noise and Vibration
- Chapter 12 Ecology
- Chapter 13 Ground Conditions
- Chapter 14 Water Resources
- Chapter 15 Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill
- Chapter 16 Wind

- Chapter 17 Climate
- Chapter 18 Cumulative Effects
- Chapter 19 Summary of Additional Mitigation and Residual Effects

Environmental Statement Volume 2: Built Heritage, Townscape and Visual Assessment

- Chapter 1 Built Heritage
- Chapter 2 Townscape and Visual

Environmental Statement Volume 3: Technical Appendices

- Appendix 1.1 IEMA Quality Mark Checklist
- Appendix 1.2 Regulation 18(5)(B) Statement
- Appendix 2.1 EIA Scoping Opinion Request Report
- Appendix 2.2 Royal Borough of Kensington and Chelsea EIA Scoping Opinion and Waterman Report
- Appendix 2.3 London Borough of Hammersmith and Fulham Scoping Opinion and Waterman Report
- Appendix 2.4 Post-Scoping Opinions Consultations – 19 March 2024
- Appendix 2.5 Post-Scoping Opinions Consultations (Ground Conditions and Water Resources) – May/June 2024
- Appendix 2.6 Aviation Impact Assessment
- Appendix 2.7 Telecommunications Impact Assessment
- Appendix 2.8 Construction Waste Management Plan
- Appendix 5.1 Demolition and Construction Time Slices
- Appendix 6.1 Archaeological Desk Based Assessment
- Appendix 6.2 Greater London Archaeological Advisory Service Consultations
- Appendix 8.1 Baseline Data
- Appendix 8.2 Health Economic Assessment Tool for Walking and Cycling
- Appendix 9.1 Transport Link Data and Outputs
- Appendix 10.1 Legislation, Policy and Consultation
- Appendix 10.2 Assessment Methodology
- Appendix 10.3 Model Results
- Appendix 11.1 Legislation, Policy, Guidance and Consultations
- Appendix 11.2 Baseline Noise Surveys
- Appendix 11.3 Baseline Vibration Survey
- Appendix 11.4 Further Construction Stage Information
- Appendix 11.5 Further Operational Stage Information
- Appendix 11.6 Noise and Vibration Site Suitability Assessment
- Appendix 12.1 Earls Court Preliminary Ecological Appraisal (2024)
- Appendix 13.1 Geo-Environmental Preliminary Risk Assessment
- Appendix 14.1 Flood Risk Assessment and Outline Drainage Strategy
- Appendix 15.1 Planning Policy and Guidance
- Appendix 15.2 Methodology
- Appendix 15.3 Assumptions and Limitations
- Appendix 15.4 Property Scoping Process
- Appendix 15.5 Scenario Overview
- Appendix 15.6 Daylight and Sunlight Results

- Appendix 15.7 Daylight, Sunlight and Overshadowing Alternative Target Review Table
- Appendix 15.8 Window Maps
- Appendix 15.9 No Skyline Contours
- Appendix 15.10 Overshadowing Results
- Appendix 15.11 Solar Glare Results
- Appendix 15.12 Light Spill Results
- Appendix 15.13 Daylight, Sunlight and Overshadowing Contextual Report and Appendices
- Appendix 15.16 Illustrative Scheme and Supplementary Wind Microclimate Assessment
- Appendix 19.1 Borough Reporting

Environmental Statement: Non-Technical Summary

REVISED SUBMISSION (received September 2025)

- Architectural Drawings and Drawing Schedule (see above)
- Additional Community Infrastructure Levy Information Form Revision 01 – prepared by ECDC Planning (August 2025)
- Cover Letter – prepared by the Earls Court Partnership Limited dated 15 August 2025
- Planning Statement Addendum prepared by ECDC Planning (August 2025)
- Illustrative Masterplan Drawings Revision.01 - prepared by Hawkins\Brown & Studio Egret West (July 2025)
- Design & Access Statement Addendum Volume 1: Outline Component – prepared by Hawkins\Brown & Studio Egret West (August 2025)
- Design & Access Statement Volume 3: LBHF Detailed Component Addendum — prepared by Sheppard Robson/ Serie/ dRMM (July 2025)
- Development Specification Revision 01 - prepared by ECDC Planning (August 2025)
- Design Code Revision. 01 - prepared Hawkins\Brown & Studio Egret West (July 2025)
- Parameter Plans Revision -01 – prepared by Hawkins\Brown & Studio Egret West (July 2025)
- Air Quality Positive Statement Addendum – prepared by Ramboll (July 2025)
- Affordable Workspace Strategy - prepared by Quod (July 2024)
- Arboricultural Impact Assessment Addendum – prepared by Ramboll (July 2025)
- Biodiversity Net Gain Assessment Addendum – prepared by Ramboll (July 2025)
- Urban Greening Factor Plan Addendum – prepared by Hawkins\Brown & Studio Egret West (July 2025)
- MP03 Illustrative Urban Greening Factor Plan – prepared by Hawkins\Brown
- MP03 Illustrative UGF Categories Per Plot – prepared by Hawkins\Brown
- MP03 Urban Greening Factor Plan with Maximum Building Line – prepared by Hawkins\Brown
- MP03 Urban Greening Factor Plan Early Phases with Maximum Building Line - prepared by Hawkins\Brown
- MP03 Proposed Trees with Maximum Building Line – prepared by Hawkins\Brown

- MP03 Proposed Trees Early Phases with Maximum Building Line – prepared by Hawkins\Brown
- Illustrative UGF Categories per plot – prepared by Hawkins\Brown
- Housing Statement Addendum (August 2025)
- Commercial Strategy Addendum – prepared by ECDC, JLL & Knight Frank (July 2025)
- Cultural Strategy Revision 01 - prepared by ECDC/Sound Diplomacy (July 2025)
- Office Impact Assessment – prepared by ECDC Planning (July 2025)
- Economic Inclusion Statement Clarification –May 2025 - prepared by SQW (May 2025)
- Temporary Uses Strategy Addendum – prepared by ECDC/ Hawkins\Brown & Studio Egret West (July 2025)
- Town Centre Impact Assessment Addendum B: Response to LBHF (LSH) Appraisal – prepared by ECDC Planning (August 2025)
- Construction Site Waste Management Plan Addendum – prepared by Turner & Townsend (July 2025)
- Energy Strategy Addendum– prepared by Hoare Lea (July 2025)
- Carbon Emission Reporting Spreadsheet – Outline Illustrative Masterplan
- Be Seen Spreadsheet
- LBHF Financial Viability Assessment Addendum (LBHF) – prepared by Quod (August 2025)
- Flood Risk Assessment & Outline Drainage Strategy Addendum – prepared by WSP (July 2025)
- Drainage Statement WB03, WB04 & WB05 Addendum - prepared by Walsh (July 2025)
- Integrated Water Management Strategy Addendum – prepared by WSP (July 2025)
- Fire Strategy Revision 02 - prepared by Hoare Lea (July 2025)
- Fire Statement WB03: Revision 01 - prepared by OFR (July 2025)
- Fire Statement WB04: Revision 01 - prepared by OFR (July 2025)
- Fire Statement WB05: Revision 01 - prepared by OFR (July 2025)
- Gateway 1 Form WB03, WB04 & WB05: Revision. 01 - prepared by OFR (July 2025)
- LBHF Housing Statement Addendum prepared by QUOD (August 2025)
- Impacts on Neighbours: Contextual Daylight, Sunlight & Overshadowing Report Technical Addendum – prepared by GIA (July 2025)
- Amenity within the Site: Internal Daylight, Sunlight & Overshadowing Assessment WB03, WB04 & WB05: Revision 01 – prepared by GIA (July 2025)
- Amenity within the Site: Internal Daylight, Sunlight & Overshadowing Technical Addendum - prepared by GIA (July 2025)
- Overheating Risk and Thermal Comfort Strategy: Addendum - prepared by Hoare Lea (August 2025)
- Sustainability Strategy Addendum - prepared by Hoare Lea (July 2025)
- Sustainability Statement: WB03 Technical Note – prepared by Hoare Lea (July 2025)
- Sustainability Statement: WB04 Addendum - prepared by Hoare Lea (July 2025)
- Sustainability Statement: WB05 Technical Note – prepared by Hoare Lea (July 2025)
- Statement of Community Involvement Addendum – prepared by Kanda (July 2025)
- Transport Assessment Addendum - prepared by WSP (August 2025)
- Draft Delivery & Servicing Plan - WB03, WB04 & WB05 Addendum prepared by WSP (July 2025)

- Draft Operational Waste Management Plan WB03, WB04 & WB05 Addendum - prepared by WSP (July 2025)
- Draft Parking Design & Management Plan WB03, WB04 & WB05 Addendum - prepared by WSP (July 2025)
- Draft Travel Plan WB03, WB04 & WB05 Addendum - prepared by WSP (July 2025)
- Framework Delivery & Servicing Plan Addendum prepared by WSP (July 2025)
- Draft Parking Design and Management Plan Addendum prepared by WSP (August 2025)
- Framework Travel Plan Addendum prepared by WSP (July 2025)
- Framework Basement Impact Assessment Technical Note - prepared by WSP (July 2025)
- Framework Construction Management Plan Addendum - prepared by Turner & Townsend (July 2025)
- Framework Construction Traffic Logistics Plan Addendum - prepared by Turner & Townsend (July 2025)
- Framework Parking Management Plan Addendum - prepared by WSP (July 2025)
- Operational Waste Management Plan Revision 01 - prepared by WSP (July 2025)
- Whole Life Carbon and Circular Economy Strategy: Addendum – prepared by Hoare Lea (July 2025)
- WB04 GLA_CIRCULAR_ECONOMY_STATEMENTS
- LHBF DETAILED GLA_WLCA_ASSESSMENT_TEMPLATE
- Utilities & Services Infrastructure Strategy Addendum – prepared Hoare Lea (July 2025)

Environmental Statement Addendum - prepared by Ramboll (August 2025)

Environmental Statement Volume 1 Addendum: Main Environmental Statement Report

- Chapter 1A Introduction Addendum
- Chapter 2A EIA Process and Methodology Addendum
- Chapter 3A Alternatives and Design Evolution Addendum
- Chapter 4A Amended Proposed Development Description
- Chapter 5A Amended Demolition and Construction Description
- Chapter 6A Archaeology Addendum
- Chapter 7A Socio-Economics Addendum
- Chapter 8A Human Health Addendum
- Chapter 9A Transport and Accessibility Addendum
- Chapter 10A Air Quality Addendum
- Chapter 11 A Noise and Vibration Addendum
- Chapter 12A Ecology Addendum
- Chapter 13A Ground Conditions Addendum
- Chapter 14A Water Resources Addendum
- Chapter 15A Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill Addendum
- Chapter 16A Wind Addendum
- Chapter 17A Climate Addendum

- Chapter 18A Cumulative Effects Addendum
- Chapter 19A Summary of Additional Mitigation and Residual Effects

Environmental Statement Volume 2 Addendum: Built Heritage, Townscape and Visual Assessment

- Chapter 1A Built Heritage Addendum
- Appendix 1.2A Technical Appendix Addendum: Maps of Heritage Study Area
- Appendix 1.3A Technical Appendix Addendum: Amended Maps of Heritage Study Area Overlaid with Zone of Theoretical Visibility
- Appendix 1.6A Technical Appendix Addendum: Maps of Heritage Assets Scope in for Assessment
- Chapter 2A Townscape and Visual Assessment Addendum
- Appendix 2.1A Updated Verified and Non-Verified Views

Environmental Statement Volume 3: Technical Appendices

- Appendix 1.2A Regulation 18(5)(B) Statement Addendum
- Appendix 2.6A Aviation Impact Assessment Addendum
- Appendix 2.7A Telecommunications Impact Assessment Addendum
- Appendix 2.8A Construction Waste Management Plan Addendum
- Appendix 9.1 Operational Waste Management Plan Revision 01
- Appendix 2.10 Waterman, Schrodgers Begg and Consil Final Review of Environmental Statement
- Appendix 6.1A Archaeological Desk Based Assessment Addendum
- Appendix 9.1A Transport Link Data and Outputs Addendum
- Appendix 10.1A Amended Legislation, Policy and Consultation
- Appendix 10.2A Amended Assessment Methodology
- Appendix 10.3A Amended Model Results
- Appendix 11.1A Amended Legislation, Policy and Consultations
- Appendix 11.4A Amended Construction Stage Information
- Appendix 11.5A Amended Operational Stage Information
- Appendix 11.6A Noise and Vibration Site Suitability Assessment
- Appendix 12.1A Earls Court Preliminary Ecological Appraisal Addendum
- Appendix 13.1A Geo-Environmental Preliminary Risk Assessment Addendum
- Appendix 14.1A Flood Risk Assessment and Outline Drainage Strategy Addendum
- Appendix 15.5A Amended Scenario Overviews
- Appendix 15.6A Amended Daylight and Sunlight Results
- Appendix 15.8A Amended Window Maps
- Appendix 15.9A Amended No Skyline Contours
- Appendix 15.13A Daylight, Sunlight and Overshadowing Contextual Report and Appendices Addendum
- Appendix 16.2A Atmospheric Boundary Layer Simulation Information
- Appendix 16.3A Landscapes Modelling Information
- Appendix 16.4A Balcony Modelling Information
- Appendix 19.1A Borough Reporting Addendum

Environmental Statement: Non-Technical Summary Addendum

Appendix B - LIST OF CONSULTATION & NEIGHBOUR COMMENTS (ADDRESSES)

Consultation Comments:	Date:
Active Travel England	23.09.2024
Theatres Trust	04.10.2024
Thames Water – Development Control	04.10.2024
Environment Agency - Planning Liaison	07.10.2024
Historic England London Region	07.10.2024
Greater London Archaeological Advisory Service (GLAAS)	07.10.2024
Health and Safety Executive (HSE)	07.10.2024
The London Heliport Limited	08.10.2024
Metropolitan Police - Crime Prevention Design Advisor	09.10.2024
Sport England	09.10.2024
The Gardens Trust	14.10.2024
Transport for London (TfL) - Infrastructure Protection Team	18.10.2024
Greater London Authority (GLA)	11.11.2024
Transport for London (TfL) - Spatial Planning	28.11.2024
The Royal Parks	29.11.2024
NHS London Healthy Urban Development Unit (HUDU)	29.11.2024
Network Rail	30.12.2024
NHS London Healthy Urban Development Unit (HUDU)	02.01.2025
London Historic Parks and Gardens Trust	10.01.2025
NATS (National Air Traffic Services)	04.02.2025
Twentieth Century Society	05.02.2025
UK Power Networks	04.03.2025
BAA-Heathrow Airport	04.04.2025
NHS London Healthy Urban Development Unit (HUDU)	23.06.2024
Transport for London (TfL) - Spatial Planning	05.09.2025
Active Travel	10.09.2025
Cadent Gas Ltd	11.09.2025
UK Power Networks	11.09.2025
Environment Agency	12.09.2025
Thames Water	16.09.2025
Greater London Archaeological Advisory Service (GLAAS)	25.09.2025
Transport for London (TfL) - Infrastructure Protection Team	26.09.2025
Health and Safety Executive (HSE)	01.10.2025
Kensington Chelsea & Westminster Chamber of Commerce	02.10.2025
Metropolitan Police - Crime Prevention Design Advisor	03.10.2025

Action on Disability (AoD)	16.10.2025
The Royal Parks	17.10.2025
Sport England	31.10.2025
Theatres Trust	31.10.2025
Transport for London (TfL) - Spatial Planning	07.11.2025
The Royal Parks	11.11.2025
NHS London Healthy Urban Development Unit (HUDU)	11.11.2025

Amenity Groups:

Hammersmith Society	25/11/2024*
Fulham Society	25.11.2024*
Lillie Road Residents Association	25.11.2024*

** Individual comments + joint letter*

West Kensington TRA Secretary	25.11.2024
The Earl's Court Area Action Group (ECAAG)	25.11.2025
Edwardes Square, Scarsdale & Abingdon Association	25.11.2024
The Earls Court Society	26.11.2024
Save Earl's Court Supporters Club (SECSC)	27.11.2024
The Earls Court Society	27.11.2024
Friends of Brompton Cemetery	02.12.2024
West Kensington Estate TRA Secretary	07.10.2025
RMT's Piccadilly and District West Branch	07.10.2025
Save Earl's Court Supporters Club (SECSC)	10.10.2025
The Earl's Court Area Action Group (ECAAG)	10.10.2025

Neighbour Comments: (OBJECTION)

Date:

LBHF

27 Fabian Road SW6	21.09.2024
Flat 72, West Kensington Court, West Cromwell Road W14	23.09.2024
72 West Kensington Court, West Cromwell Road W14	26.09.2024
2 Napier Avenue SW6	27.09.2024
Kelway House, North End Road W14	27.09.2024
Flat 14C, 28-30 Mornington Avenue W14	28.09.2024
Apartment 3.03, 7 Lillie Square SW6	29.09.2024
No Address Given (OH)	03.10.2024
17 Eustace Road SW6	09.10.2024
78 Walham Green Court SW6	11.10.2024
Flat 69, Burne Jones House, North End Road W14	14.10.2024
No Address Given (RW)	14.10.2024
30 Lillie Road SW6	22.10.2024
33 Ongar Road SW6	23.10.2024
28 Ashcombe Street SW6	28.10.2024
59 Clancarty Road SW6	05.11.2024

50 Agate Road W6	07.11.2024
61A Fairholme Road W14	11.11.2024
59a Ongar Road SW6	15.11.2024
55 Anselm Road SW6	16.11.2024
No Address Given (MA)	20.11.2024
32 Lillie Road SW6	22.11.2024
Flat 44, Desborough House, North End Road W14	24.11.2024
59a Ongar Road SW6	25.11.2024
57 Musard Road W6	25.11.2024
27 Fabian Road SW6	25.11.2024
2 Hildyard Road SW6	25.11.2024
2 Hildyard Road SW6	25.11.2024
56 Lillie Road SW6	25.11.2024
347A North End Road SW6	26.11.2024
No Address Given (PJH)	27.11.2024
No Address Given (TR)	27.11.2024
35 Poplar Grove W6	02.12.2024
27 Racton Road SW6	11.01.2025
32 Lillie Road SW6	23.01.2025
50 Agate Road London W6	20.07.2025
No Address Given (EM)	20.07.2025

122c Edith Road W14	19.09.2025
23 Eustace Road SW6	20.09.2025
28 Elmstone Road SW6	03.10.2025
Flat 4 Block M, Peabody Estate, Lillie Road, SW6	03.10.2025
89 Lillie Road SW6	04.10.2025
55 Carrara Wharf W12	10.10.2025
Flat 5, 39 Gunterstone Road W14	12.10.2025
3 Lillie Square SW6	13.10.2025
1 Trevanion Road W14	13.10.2025
Flat 3. 8 Barons Court Road, W14	14.10.2025
88 Archel Road W14	15.10.2025
50 Agate Road W6	19.10.2025
GFF, 15 Castletown Road, W14	29.10.2025
31 Epirus Road SW6	14.11.2025

RBKC

Ifield Road London SW10	02.10.2024
43 Eardley Crescent London SW5	24.10.2024
Flat 9, Latham Court, 94 West Cromwell Road W14	30.10.2024
27 Bolton Gardens SW5	05.11.2024
Flat 3, 110 Philbeach Gardens SW5	12.11.2024
Flat 8, 65 Warwick Road SW5	24.11.2024
8 Earls Court Road W8	24.11.2024
Flat 3, 61 Earls Court Square SW5	24.11.2024
20D, Philbeach Gardens SW5	25.11.2024
Earls Court Square SW5	25.11.2024
Old Brompton Road SW5	25.11.2024

8 Earls Court Square SW5	25.11.2025
23 Philbeach Gardens SW5	25.11.2024
3 Hobury Street SW10	25.11.2024
24 Clanricarde Gardens W2	25.11.2024
105 Philbeach Gardens SW5	26.11.2024
29 Kempsford Gardens SW5	27.11.2024
126 Finborough Road SW10	03.12.2024
Longridge Road SW5	18.02.2025

Refettorio Felix - St Cuthbert's Centre 51 Philbeach Gardens SW5	09.10.2025
20D Philbeach Gardens SW5 (2025/02404/OBS)	10.10.2025
60 Nevern Square SW6	14.11.2025

Others

No Address Given (MM)	13.10.2025

Neighbour Comments: (SUPPORT)

Date:

LBHF

Flat 2.05, 2 Bolander Grove SW6	21.09.2024
Flat 5, 11 Mornington Avenue W14	25.09.2024
122 Halford Road SW6	25.09.2024
145 Gibbs Green Close West Kensington W14	05.10.2024
39 Desborough House 245 North End Road W14	07.10.2024

74 North End Road W14	14.10.2024
6 Strode Road SW6	14.10.2024
179 Seagrave Road SW6	15.10.2024
6 Delaford Street SW6	15.10.2024
234b Hammersmith Grove W6	15.10.2024
7 Glazbury Road W14	15.10.2024
47 Fairburn House Ivatt Place W14	18.10.2024
Flat B, 3 Vera Road Fulham SW6	18.10.2024
88 Sullivan Court, Peterborough Road SW6	24.10.2024
Flat First Floor, 51 Sedlescombe Road SW6	25.10.2024
Peterborough Road SW6	25.10.2024
Flat 73 Churchward House Ivatt Place W14	01.11.2024
38 Lickey House 243 North End Road W14	01.11.2024
31 Ongar Road SW6	01.11.2024
Flat 1.04, 1 Bolander Grove SW6	06.11.2024
Flat C, 24 Harwood Road SW6	08.11.2024
Flat 3 2 Challoner Crescent W14	10.11.2024
3 Spencer Mansions, Queens Club Gardens W14	13.11.2024
49 The Grampians Shepherd Bush Road W6	13.11.2024
53 Chesson Road W14	17.11.2024
14B Aisgill Avenue West Kensington W14	18.11.2024

8 K Block, Peabody Estate, Lillie Road SW6	18.11.2024
No Address Given (SC)	18.11.2024
Flat 7 Kingsley Mansions Greyhound Road W14	21.11.2024
37 Racton Road SW6	21.11.2024
Flat 2, York House, 1A Seagrave Road SW6	21.11.2024
1A Seagrave Road SW6	21.11.2024
1A Seagrave Road SW6	21.11.2024
1A Seagrave Road SW6	21.11.2024
No Address Given (TR)	21.11.2024
Lickey House North End Road W14	22.11.2024
Top Floor Flat, 1 Hildyard Road SW6	23.11.2024
59 Napier Avenue SW6	23.11.2024
14 Lillie Road SW6	24.11.2024
41 Colwith Road W6	25.11.2024
43 Colwith Road W6	25.11.2024
24 Lillie Road SW6	25.11.2024
32 Ongar Road SW6	25.11.2024
Apt. 1.04, One Columbia Gardens SW6	25.11.2024
7c Keith Grove W12	25.11.2024
70 Tamworth Street SW6	25.11.2024
53 Marville Road SW6	25.11.2024
270 Brompton Park Crescent SW6	25.11.2024
22 Normandy Place, Bourbon Lane W12	25.11.2024
Joanna House Queen Caroline Street W6	26.11.2024
167 Brompton Park Crescent SW6	27.11.2024
Crondace Road, London SW6 4BT	27.11.2024
North End Road W14	27.11.2024
116 Gibbs Green W14	29.11.2024
116 Gibbs Green W14	02.12.2024
Kings Road SW6	02.12.2024
Flat 5, 85 Comeragh Road W14	13.12.2024
Flat 1 (Lower Ground) 47 Turneville Road W14	13.12.2024
329 Goldhawk Road W6	16.12.2024
4 Armadale Road, SW6	20.12.2024
19a New Kings Road, SW6	16.01.2025
23 Langthorne Street SW6	25.02.2025
34 Walham Grove SW6	05.03.2025
11 Ongar Road SW6	08.04.2025
62 Archel Road W14	06.06.2025
Flat 6.01, 7 Lillie Square SW6	19.06.2025
Flat C 11 Chesson Road W14	14.08.2025
7 Len Freeman Place SW6	14.08.2025
16 Horton House, Field Road W6	15.08.2025
14 Kelway House, 162 North End Road W14	15.08.2025
Flat 5 West Kensington W14	18.08.2025
1A Nye Bevan House St Thomas Way SW6	18.08.2025
Linacre Court, W14	31.08.2025
59 Racton Road SW6	07.09.2025
Flat B, 166 Hammersmith Grove W6	09.09.2025

15 Micklethwaite Road SW6	18.09.2025
3 Marchbank Road W14	19.09.2025
Flat C, 24 Harwood Road SW6	19.09.2025
62 Archel Road W14	23.09.2025
Flat 69 Borne Jone House, North End Road W14	23.09.2025
No Address Given (E)	23.09.2025
82 Barons Court Road, W14	25.09.2025
Flat 12B, Block Peabody Estate, Lillie Road, SW6	26.09.2025
Flat 44, 21-27 Seagrave Road SW6	26.09.2025
104 Rannoch Road W6	29.09.2025
Westway W12	29.09.2025
Lyric Hammersmith Theatre Lyric Square, King Street W6	02.10.2025
104 Napier Court Napier Avenue SW6	03.10.2025
Flat 1.04 I Bolander Grove SW6	04.10.2025
19 Tamworth Street SW6	06.10.2025
24 Coverdale Road W12	07.10.2025
36 Perham Road London W14	07.10.2025
The Lost Estate, 9 Beaumont Avenue, W14	10.10.2025
Cranston Court, Shepherds Bush, W12	10.10.2025
Barons Court Project, 69 Talgarth Road, W14	10.10.2025
15 Micklethwaite Road SW6	10.10.2025
16 Lillie Road SW6	10.10.2025
24 St Stephens Avenue W12	11.10.2025
82 Baron's Court Road W14	13.10.2025
22 Mirabel Road SW6	15.10.2025
Flat 3, Wordsworth Mansions, Queens Club Gardens, W14	21.10.2025
117 Percy Road W12	14.11.2025
16 Franklin Square W14	14.11.2025
11 Gibbs Green W14	14.11.2025
134 Gibbs Green W14	14.11.2025
16 Cambridge Grove SW6	14.11.2025
16C Peabody Estate Lillie Road SW6	14.11.2025
195 Lillie Road SW6	14.11.2025
22 Cheesemans Terrace SW6	14.11.2025
26 Aisgill Avenue SW6	14.11.2025
60 Aisgill Avenue SW6	14.11.2025
270 Brompton Park Crescent SW6	14.11.2025
278 Tom Williams House SW6	14.11.2025
28 Eustace Road SW6	14.11.2025
29 Queensmill Road SW6	14.11.2025
29A Parsons Green Lane SW6	14.11.2025
3 Tilton Street W14	14.11.2025
32 Michael Stewart Ho. Clem Attlee Court SW6	14.11.2025
43 Cheryls Close SW6	14.11.2025
61A Perham Road SW6	14.11.2025
7 Chesson Road W14	14.11.2025
7 Len Freeman Place, Clem Attlee Court, SW6	14.11.2025
7 Len Freeman Place, Clem Attlee Court, SW6	14.11.2025
7 Len Freeman Place, Clem Attlee Court, SW6	14.11.2025
7 Mimosa Street SW6	14.11.2025

75 Brecon Road SW6	14.11.2025
71A Seagrave Road SW6	14.11.2025
8 Hammersmith Bridge Road SW6	14.11.2025
8 Normand Mansions, Normand Road SW6	14.11.2025
Flat 12, John Knight Lodge, Vanston Place SW6	14.11.2025
93 Brompton Park Crescent SW6	14.11.2025
Flat 258 Samuel Lewis Trust, Vanston Place SW6	14.11.2025
Flat 258 Samuel Lewis Trust, Vanston Place SW6	14.11.2025
Flat 4 Sequoia House, 191 Townmead Road SW6	14.11.2025
Flat 64, Desborough House, 245 North End Road SW6	14.11.2025

RBKC

1 Wetherby Mews SW5	22.09.2024
Flat 2, 50 Warwick Gardens W14	02.10.2024
Flat 35a, The Mansions, 252 Old Brompton Road SW5	17.10.2024
26 Collingham Place SW5	23.11.2024
5 Kensington Square London W8	25.11.2024
31 Moore Street London SW3	25.11.2024
Earls Court Youth Club - 120 Ifield Road SW10	25.11.2024
50 Cheniston Gardens W8	25.11.2024
5 Purcell House, Milmans Street SW10	25.11.2024
120 Ifield Road SW10 9AF	25.11.2024
14 Hogarth Road SW5	26.11.2024

19 Broadwood Terrace W8	02.12.2024
1 Denbigh House, Portobello Court W11	02.12.2024
20 Eardley Crescent SW5	02.12.2024
Flat 11 Mathison House, Coleridge Gardens, SW10	27.01.2025
18 Kempsford Gardens SW5	30.07.2025
Flat 12, Paul Byrne Court, 31 Braham Gardens SW5	19.08.2025
18 Kempsford Gardens SW5	09.09.2025
20/22 Aquarius Hotel, Hogarth Road SW5	09.09.2025

23 Nevern Square SW5	01.10.2025
23 Nevern Square SW5	01.10.2025
66A Barkston Gardens SW5	11.10.2025
16 Cromwell Crescent SW5	15.10.2025
Earls Court Youth Club - 120 Ifield Road SW10	17.10.2025

(Includes individual representations from the following:)

- Flat 3, 10-11 Cresford Road SW6
- 6 Redcliffe Close, Old Brompton Road SW5
- 65 Ifield Road SW10
- 69 Ifield Road SW19
- Flat 2, 81 Ifield Road SW10
- Flat 52, Hortensia House, Hortensia Road SW10
- 51A Finborough Road SW10
- Flat 8, 110 Elm Park Gardens SW10
- Flat 8, Winch House, Kings Road SW10
- 86A Warwick Road W14
- LSE Rosebery Hall, 90 Rosebery Avenue EC1R
- SW10 (No Address Given)

Flat 42, Winterton Tower, Worlds End Estate SW10	14.11.2025

Flat 3, 13 Longridge Road SW5	14.11.2025
Flat 3, 13 Longridge Road SW5	14.11.2025
Flat 3, Nevern Road SW5	14.11.2025
Flat 13, 201 Cromwell Mansions SW5	14.11.2025
68A Longridge Road SW5	14.11.2025
Flat 5, 69 Longridge Road SW5	14.11.2025
Flat 14, 90 Redcliffe Gardens SW10	14.11.2025
19 Warwick Mansions, 22 Cromwell Crescent SW5	14.11.2025
3 Elm Park Road SW3	14.11.2025
29B Lancaster Road W11	14.11.2025
107 Ifield Road SW10	14.11.2025
No Address Given (M)	14.11.2025

Others

678 Hobart House 18 Wandsworth Road SW18	08.10.2024
No Address Given (SR)	07.10.2024
First floor 115A Kilburn Lane W10	09.10.2024
No 1 Village Courtyard Circus West Village, Battersea P.S. SW11	25.11.2024
Flat 216, Viridian Apartments SW8	25.11.2024
Bellevalia Court London E5 9PD	26.11.2024
337 Psalter Lane, Sheffield S11	27.11.2024
Flat 23, 212 Wandsworth Road SW8	27.11.2024
Sussex Barn, Witherenden Road, Mayfield TN20	28.11.2024
7 Phoenix Close SE8	05.12.2024
30 Crown Place EC2A	16.12.2024
19 Boundary Road, Hove, BN3	16.12.2024
6 Mitre Passage SE10	20.01.2025
6 Mitre Passage SE10	20.01.2025
No Address Given (H.E-M)	05.02.2025
93 Hater Road SW2	11.02.2025
32 Bostock House, 14 Biscoe Close, TW5	25.02.2025
25 Essex Road Romford Essex RM7	11.03.2025
606 Cinnamon Wharf, 24 Shad Thames, SE1	21.05.2025
42A Totteridge Common N20	26.06.2025
77 Malmö Tower London SE8	11.07.2025
58 Montem Road SE23	12.08.2025
London Giants Volleyball Club	15.09.2025
606 Cinnamon Wharf 24 Shad Thames SE1	18.09.2025
5 Ashton Gardens, Hounslow, TW4	20.09.2025
12 Christchurch Close, North Finchley, London N12	22.09.2025
20 Burnside Crescent, Alperton. London HA0	22.09.2025
169 Stebbing House, 5 Queensdale Crescent, W11	26.09.2025
4 Chiswick Wharf W4	01.10.2025
19 The Green, Bexleyheath, Kent, DA7	02.10.2025
Maple House, 382 Kenton Road, Kenton, Harrow HA3	06.10.2025
3 The Mews, Bodmin Hill, Lostwithiel, Cornwall PL22	07.10.2025
19 Stoke Fields, Guildford GU1	08.10.2025
10 Longleigh House, Peckham Road SE5	10.10.2025
5 Hainthorpe Road SE27	10.10.2025

115a Kilburn Lane London W10	10.10.2025
1A Saltoun Road London SW2	10.10.2025
No Address Given (ZC)	25.10.2025
301 Fairbairn Hall, 310 Barking Road, Newham E13	04.11.2025
45 The Avenue, West Ealing, W13	04.11.2025
8 Melrose Avenue, SW16	04.11.2025
129 Torriano Avenue, NW5	13.11.2025
72 Friars Avenue SW15	14.11.2025
4 Sherborne Road, Petts Wood, BR5	18.11.2025

**Neighbour Comments:
(Neutral)**

Date:

LBHF

2 Sun Road, West Kensington W14	25.09.2024
31 Rainsborough Square, Fulham, SW6	26.09.2024
Gunterstone Road W14	30.09.2024
Flat 72, Churchward House, Ivatt Place W14	28.09.2024
82 Churchwardens House, Ivatt Place W14	01.11.2024
44 Avonmore Road W14	13.11.2024
18 Unwin Mansions W14	13.11.2024
Pearcroft Court, Fulham SW6	25.11.2024
Lillie Road SX6 1TN	26.11.2024
52 Nevern Square, 26 Rupert House SW5	19.02.2025
31 Epirus Road SW6	20.05.2025
54 Walham Grove SW6	03.06.2025
44 Carrara Wharf Ranelagh Gardens SW6	14.08.2025
93A Chesson Road SW6	15.08.2025
1 Wheatsheaf Lane SW6	19.08.2025

Flat 5, Knights House, Barons Court Road W14	16.09.2025
Earls Court Square, SW5 9DP	19.09.2025
Centenary House, The Queen's Club, Palliser Road W14	25.09.2025

35 Sedlescombe Road SW6	11.10.2025
25 Wheatsheaf Lane SW6	14.11.2025
22A Dancer Road SW6	14.11.2025
14 Cairns House 241 Wandsworth Bridge Road SW6	14.11.2025

RBKC / Others

30 Gresham Street EC2V	09.06.2025
43 Eardley Crescent, London SW5	10.09.2025
Flat 47, Heatherley Court Evering Road London N16	18.09.2025
No Address Given (PA)	22.09.2025
No Address Given (IT)	21.10.2025
32a Edith Grove SW10	24.10.2025

108 Finborough Road SW10	25.11.2024
Flat 5, 8 Earls Court Square SW5	19.09.2025
6 Wharfedale Street SW10	10.10.2025
Nevern Place SW5	14.11.2025
Flat 35A The Mansion, 252 Old Brompton Road SW5	14.11.2025

2025/02404/OBS – Neighbour Representations

Objection

20D Philbeach Gardens SW5	10.10.2025
11F Peabody Estate London SW3	14.11.2025

Support

London W12	14.11.2025
London W14	14.11.2025
Flat Ground Floor, 61 Tynemouth Street London SW6	14.11.2025
Flat 7 Pegasus Court, 3 Trenmar Gardens London NW10	14.11.2025
Flat 5, 69 Longridge Road London SW5	14.11.2025
Flat 14, 90 Redcliffe Gardens London SW10	14.11.2025
Flat 10E Peabody House London SW6	14.11.2025
9 Lakeside Road London W14	14.11.2025
86 Harwood Road London SW6	14.11.2025
73 Anselm Road London SW6	14.11.2025
71 Castletown Road London W14	14.11.2025
7 Glazbury Road London W14	14.11.2025
7 Faroe Road London W14	14.11.2025
59 West Kensington Mansions London W14	14.11.2025
52 Stafford Cripps House London SW6	14.11.2025
37 Abbey Gardens London W6	14.11.2025
32B Chesson Rd London W14	14.11.2025
30 Ashbourne Road London W5	14.11.2025
3 Spencer Mansions, Queens Club Gardens London W14	14.11.2025
19 Warwick Mansions, Cromwell Crescent London SW5	14.11.2025
17 Cambridge Road London SW13	14.11.2025
14B Aisgill Avenue London W14	14.11.2025

Neutral

Flat 2, 237 North End Rd London W14	14.11.2025
7/14 Penywern Road London SW5	14.11.2025
16 Atney Rd London SW15	14.11.2025

Appendix C - RELEVANT POLICIES

London Plan Policies

- Policy GG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a Healthy City
- Policy GG4 Delivering the homes Londoners need
- Policy GG5 Growing a good economy
- Policy GG6 Increasing efficiency and resilience
- Policy SD1 Opportunity Areas
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy SD6 Town centres and high streets
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement development
- Policy D11 Safety, security, and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy H1 Increasing housing supply
- Policy H4 Delivering affordable housing
- Policy H5 Threshold approach to applications
- Policy H6 Affordable housing tenure
- Policy H10 Housing size mix
- Policy H11 Build to Rent
- Policy H12 Supported and specialised accommodation
- Policy H13 Specialist older persons housing
- Policy H15 Purpose-built student accommodation
- Policy H16 Large-scale purpose-built shared living
- Policy S3 Education and social care facilities
- Policy S4 Play and informal recreation
- Policy S5 Sports and recreation facilities
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspaces
- Policy E9 Retail, markets, and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth

- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI 1 Improving air quality
- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy Infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 5 Water Infrastructure
- Policy SI 6 Digital connectivity Infrastructure
- Policy SI 7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SI 12 Flood Risk Management
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
 - (Policy T6.1 Residential Parking)
 - (Policy T6.2 Office Parking)
 - (Policy T6.3 Retail Parking)
 - (Policy T6.4 Hotels and leisure facilities)
 - (Policy T6.5 Non-residential disabled persons parking)
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning Guidance & Other Documents

- Accessible London: Achieving an Inclusive Environment SPG (October 2014)
- Control of Dust & Emissions during Construction and Demolition SPG (September 2014)
- Social Infrastructure (May 2015)
- Culture and Night-Time Economy SPG (November 2017)
- London Environment Strategy (May 2018)
- London View Management Framework SPG (March 2012)
- Cultural Strategy (2018)
- Mayoral CIL 2 Charging Schedule (April 2019)
- Central Activities Zone (March 2016)
- Mayor's Transport Strategy (2018)

LBHF Local Plan Policies

- Strategic Policy FRA Fulham Regeneration Area
- Strategic Policy FRA 1 Earl's Court & West Kensington Opportunity Area
- Policy H01 Housing Supply

• Policy H03	Affordable Housing
• Policy HO4	Housing Quality & Density
• Policy HO5	Housing Mix
• Policy HO6	Accessible Housing
• Policy HO7	Housing–Special Needs
• Policy HO9	Student Accommodation
• Policy HO11	Residential Standards
• Policy E1	Employment Uses
• Policy E2	Land & Premises
• Policy E3	Visitor Accommodation (Hotels)
• Policy E4	Local Employment Training & Skills
• Policy TLC1	Town & Local Centres
• Policy CF1	Community Facilities & Services
• Policy CF2	Enhance/Retention of Community Uses
• Policy CF3	Arts, Culture, Entertainment, Leisure, Recreation & Sport
• Policy OS1	Parks & Open Space
• Policy OS2	Access to Parks & Open Space
• Policy OS3	Play space
• Policy OS4	Nature Conservation
• Policy DC1	Built Environment
• Policy DC2	Design of New Build
• Policy DC3	Tall Buildings
• Policy DC5	Shopfronts
• Policy DC7	Views & Landmarks
• Policy DC8	Heritage & Conservation
• Policy DC9	Advertisements
• Policy CC1	Reduce Carbon Dioxide Emissions
• Policy CC2	Sustainability
• Policy CC3	Flood Risk
• Policy CC4	Surface Water Run-off with SuDS
• Policy CC7	Waste Management
• Policy CC9	Contaminated Land
• Policy CC10	Air Quality
• Policy CC11	Noise
• Policy CC12	Light Pollution
• Policy CC13	Control Polluting Uses
• Policy T1	Transport
• Policy T2	Transport Assessments & Travel Plans
• Policy T3	Promoting Cycling & Walking
• Policy T4	Vehicle Parking Standards
• Policy T5	Blue Badge Holders
• Policy T6	Borough Road Network
• Policy T7	Construction & Demolition Logistics
• Policy INFRA1	Planning Contributions

Relevant LBHF Supplementary Planning Guidance

- Supplementary Planning Guidance Document: February 2018

Other Relevant LBHF Documents

- Affordable Workspace Supplementary Planning Document: 2022
- Climate Change Supplementary Planning Document (SPD): 2023
- Upstream London: 2024
- Cultural Strategy – Vision