

EARL'S COURT OUTLINE PLANNING APPLICATION

EC Properties Ltd has submitted 2 outline-planning applications for the Earl's Court redevelopment. The combined site includes the Earl's Court Exhibition Centre, a railway depot and the Gibbs Green and West Kensington housing estates. All comments have to be in by 30 September 2011.

Ownership of the land

There are three main landowners on the Earl's Court site.

EC Properties Limited: They own and operate both Earl's Court and Olympia, 50% of the Empress State Building within the site. The exhibition centres Earl's Court 1 (Lease expires 2037) and Earl's Court 2 (very much longer lease).

Transport for London (TfL): They are the freehold owner of both the Lillie Road Depot and the Earl's Court Exhibition Centres.

London Borough of Hammersmith & Fulham: They own the freehold and manage the West Kensington & Gibbs Green housing estates.

The Mayor of London's London Plan

The Mayor has designated the combined sites as the combined area one Opportunity Area, classifications of Urban or Central profile does not apply in this case.¹

The Mayor has set targets for each Borough to provide new housing over a 10-year period:

10-year target	LBHF	6150	10-year target	RBKC	5850
----------------	------	------	----------------	------	------

¹ 3.2 Density Matrix (habitable rooms and dwellings per hectare)

	150-250hr/ha	200-450 hr/ha	200-700 hr/ha
Urban¹	LBHF		
3.8-4.6 hr/unit	35-65 u/hr	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/hr
Central¹	RBKC		
3.8-4.6 hr/unit	35-85 u/hr	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha	215-405 u/hr

Urban areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two – four storeys, located within 800 metres walking distance of a District Centre or, along main aerial routes.

Central areas with very dense development, a mix of different uses, large building footprints and typically building of four to six storeys, located with 800 metres distance of an International, Metropolitan or Major town centre. (Draft Replacement London Plan 2009)

Applications 1 and 2 are outline-planning applications seeking to establish certain principles about the development, which can take place probably over many years and the Seagrave Road Car Park Planning Application².

None of the proposals will be designed in detail until much later. If outline planning permission is granted, detailed proposals will be the subject of further planning applications and consultation at a later date.

The outline applications seek to establish the following principles for development:

- The amount of development
- The uses of land (residential, office, cultural, retail, etc)
- Access points from the surrounding area for pedestrians, cyclists and vehicles
- Parameters and guidelines for the layout and scale of development
- Guidelines for the future architecture and landscaping of the development

Housing Statement

b) Quantum of Residential Development

Site wide the development proposes includes 757,447 m² GEA of residential (C3) floorspace accommodating up to 6,775 high quality new homes at a variety of sizes, types and prices. There are two Development Options; the Site Wide Development Option can deliver up to 6,775 homes whilst the RBKC Only Development Option delivers up to 1,016 homes. The apportionment between the two Development Options is set out in Table 2 below. (6.8)

Development Option	Maximum Floorspace (m ² GEA)	Maximum Unit Nos*
Site Wide	757,447	6,775
RBKC Only	143,503	1,016

Table 2: Unit Size Mix and Size

Commercial

The proposed development includes a range of commercial uses. These include retail, leisure, hotel, office and culture.

Retail

In the document it states that they do not want to have a ‘clone high street’ and are therefore looking for high-end small artisan shops similar to those in Covent Garden. There seems to be little provision for every-day shops, apart from some convenience stores in the West Kensington Village area with no supermarkets, hardware stores on site to serve the new local community.

Retail should reflect residential amenity and not predominantly as a Destination/ Location disconnected from the needs of the community both present and in the future. Also this would undermine the viability or regeneration of High Street Kensington³.

² LBHF 2011/02000/FUL If the proposal for the Earl’s Court site is approved, and the West Kensington and Gibbs Green Estates are included, 200 units of the estates’ residents would be re-housed in the Seagrave Road scheme, the balance on the main site.

³ 11.3.4 In order to support the key shopping role of the centre, the loss of shops will be rigorously assessed to ensure the necessary flexibility does not undermine the vitality of the centre. (RBKC Core Strategy December 2010)

Community facilities

The planning applications propose new facilities to cater for the needs of the new population.

This includes a new primary school, nursery day care facilities, a health hub and a sports hall. It could also include a range of other facilities such as a library and space for community groups and activities. **There is no provision for secondary education or an indication of where the facilities required for an older resident centre with Age UK, Open Age and New Horizons or places of Worship.**

Access to the site

- 3.1.6.45 Exhibition Square Vehicular access will be via a left turn into Empress Crescent, and out onto Warwick Road
- 3.1.6.46 Counter's Place into Empress Crescent
- 3.1.6.47 Broadway South from Lillie Road
- 3.1.6.49 Lillie Gardens from Lillie Road
- 3.1.6.50 High Street West from North End Road
- 3.1.6.51 Counter's Hill from North End Road
- 3.1.6.53 Beaumont Avenue from North End Road
- 3.1.6.54 West Kensington Road from West Cromwell Road
- 3.1.6.55 Broadway North from West Cromwell Road
- 3.1.6.57 Service road from 100 Cromwell Road⁴

Naming of the Villages

It has been pointed out to the developers that the use of the name Earl's Court Village already exists, and another name needs to be found for the area within the development with the same name.

The main area designated for Culture within the plan is around the Empress State Building. In the streets they would a 'Via Tortona' concept would have exhibition space for temporary exhibitions combined with small shops for artisans, and is predominantly in the open.

The Proposal

- The creation of new publicly accessible streets, gardens and squares including children's play space
- Up to 6,775 residential units
- Two hotels totalling 19,023 sqm
- Education/community/cultural uses totalling 18,221 sqm
- Retail totalling 29,430 sqm
- Leisure totalling 14,109 sqm
- Commercial (offices) totalling 120,615 sqm
- Health facilities totalling 11,687 sqm
- Parking, circulation, servicing and plant totalling 164,162 sqm
- Stabling totalling 10,205 sqm

The developer's concept of Culture:

- Street Life
- Food and Retail
- Entertainment

⁴ At present the Northern Access Road under Tesco's on West Cromwell Road is for Exhibition Centre Traffic only

- Streetscape
- Open Space
- Quality Design
- Community hubs/experience
- Artistic practice
- Cultural business/entrepreneurship

Their solutions include: Flexible space with pop-spaces for temporary use, designed space for possible lead creative tenant, Sculpture Trail, Text Trail to aid navigation,

They intend to have a Build-Up Creative Programme: Temporary Hoarding Project, host smaller events, specialist 'Pop-Up' market and cinema, open air concerts, temporary exhibition and growing spaces.

Descriptions of profile of streets and villages

The High Street

The central road from east to west⁵

*The Broadway*⁶

Is part of the primary structure of the masterplan and provides the primary North-South route through the site.

The Villages

*Earl's Court Village*⁷

Is defined by its High street and proximity to Earl's Court underground station and Warwick Road with crescents of terraced houses and mansion blocks with taller elements consisting of larger lateral flats with some houses that attract families and a number of owner-occupiers. The developers have been told repeatedly that Earl's Court Village is a name already well established.

Exhibition Square

3.7.2.17 At Exhibition Square shops, cafés, cultural facilities and a hotel space used for cultural installations and events.

*Warwick Walk*⁸

(3.7.2.18) Will be a narrow enclosed street for pedestrians only. It will be a specialist London place of high quality luxury and rare treats for refined tastes. With tailoring, high fashion dress and clothing, flowers, fashion, glamour, rare foods and specialities, pastries – cakes, upmarket coffee, books and papers.

The Circus (3.7.2.19) The Western end of Warwick Walk will open into The Circus a small London space, which will be the focus of café culture.

⁵ **Precedents** The character of the High Street is inspired by Marylebone High Street and Kensington Church Street; both successful well-known and well-loved London high streets. These streets provide neighbouring residents with their necessary local amenities as well as providing a range of one-off independent retailers, restaurants and bars, which also attract people from further afield.

⁶ **Precedents** 3.7.7.4 The Broadway takes its inspiration from other great metropolitan thoroughfares such as Sloane Street and Kingsway. These grand avenues have buildings appropriate in scale and mass to support their great commercial and residential uses and streetscapes with formal tree planting and generous pavement widths.

⁷ 3.7.2.21 **Resident topologies** Terraced houses, mansion blocks and taller buildings

⁸ 3.7.2.21 Terraced houses, mansion blocks and taller buildings.

Park Gate (3.7.2.20) At the point where the High Street crosses the Lost River Park. Sports Club pavilions will be set back from the High Street in the park.

North End Village^{9, 10, 11}

Intends to provide a vibrant street life and range of good quality, high density, and residential accommodation. This area will be offering a wide variety of product at lower price points and will aim to achieve high densities; smaller unit sizes in this area will enable a greater range of affordability across the whole scheme. Small-scale independent retailers.

3.7.4.18 There is the opportunity for a school to be positioned within the village opening onto and utilising the Thaxton Square adjacent, more residential with flexi-office space, but there is no mention of secondary education provision within the proposals.

West Kensington Village^{12, 13, 14}

This village forms the northern entrance to the site as well as a metropolitan front door to London due to its presence on the A4, pre-dominantly commercial with loft-style apartments, convenience stores and gym.

West Brompton Village^{15, 16, 17}

⁹ **The Precedents** The animated streets of Clifton Road and Portobello Road Market are the precedents for North End Village. These areas exude an energy driven by the activity and interest of their ground floor uses and its interaction with adjacent pavement space. The market at Ladbrooke Grove feeds off of its surrounding retail, restaurants and cafes and in return infuses the local offer with its character. The al fresco dining at Clifton Road brings people onto the street contributing to the daily theatre of the public realm. (3.7.4.6)

¹⁰ **Residential Typologies** The village will include a large portion of mixed tenure residential buildings and typologies supported within a London mansion block style building, these will house a variety of typologies including duplexes, apartments, studio apartments and penthouses. (3.7.4.19)

¹¹ 3.4.12 **Scale and Massing**

1. The scale and massing decreases from the centre of the site, due to the existing site levels and to meet with existing buildings to the west of North End Road.

2. The buildings along North End Village should be composed as a group and should not appear monolithic when viewed as a whole. The block structure seeks to create a permeable urban environment with framed apertures looking into the village and out towards the surroundings. Also refer to Part 2:

Legibility and Part 4: Elevation Principles.

3. The height of buildings should step up towards the The Broadway. The buildings within Thaxton Square residential quarter step down towards the existing buildings surrounding the site.

¹² **The Precedents** The Regent's Place development is commercial in its focus and has proved a viable business address whilst also providing significant new public realm and usable, defined streets. It has a public frontage but a well considered network of spaces and linkages away from this edge allowing for the provision of different uses including residential.

¹³ **Residential Typologies** A range of homes will be provided in this village, ranging from loft-style apartments adjacent to the commercial properties to mansion block and terraced apartments moving southwards into the plan.

¹⁴ 3.7.12 **Scale and Massing:**

1. The scale and massing of buildings has been created to frame the Broadway and entrance to the site, with larger buildings located next to the Broadway and smaller ones next to the edge of the site.

2. Buildings are set back to emphasise the new entrance and create Cromwell Place.

3. The buildings throughout West Kensington should be composed as a group and should not appear monolithic when viewed as a whole. The block structure seeks to create a permeable urban environment with framed openings looking into the village and out towards the surroundings.

4. The height of buildings step upwards towards the central node (3) located at the intersection with the Broadway and then step back down towards either side to the existing buildings surrounding the site.

5. The scale and massing should be appropriate to create the metropolitan front door.

The village is predominantly residential in line with the scale and massing of the existing development along Lillie Road and will offer a varied product to a wide target market with western parts of the area offering similar types of product to Earl's Court Village, with family homes, shop, restaurants, a nursery, a new two-form entry primary school with attached nursery with two classes and day care facilities

Residential areas

Within the masterplan there are 6 residential quarters: Gibbs Green, Thaxton Square, Whitley Green, West Whitley Green, Counters Green and West Counters Green.

Development Option	Maximum Floorspace (m2 GEA)	Maximum Unit Nos*
Site Wide	757,447	6,775
RBKC Only	143,503	1,016

Proposed Accommodation Unit Mix Range*

Unit Type	Proportion Range Within RBKC	Proportion Range Within LBHF	Minimum Unit Size m2 (NIA)
1 person apt	2% - 5%	2% - 5%	38
1 bed	20% - 35%	29% - 35%	50
2 bed	30% - 40%	30% - 40%	61
3 bed	20% - 25%	20% - 25%	74
4 bed +	5% - 20%	5% - 10%	90

Apart from the re-location of the tenants of the Gibbs Green and West Kensington Estate there is no additional Social Rented Housing, which does not give a full range of housing choices, on this site in light of the recently published London Plan Chapter 3:11 with 60% Affordable Rented/40% Affordable Intermediate. At present there is Affordable Intermediate and no indication of Affordable Private Rented.

To deliver a development that will create a ladder of opportunity in a mixed and sustainable, socially inclusive community containing a significant number of new high quality homes offering increased housing choice through new intermediate housing and

¹⁵ **The Precedents** The character of West Brompton Village will be inspired by places like Maida Vale and Kew Village. With excellent access to greenery and with mature street planting these areas have a calm genteel feel that is popular with families and the older generation. Limited retail and commercial offers result in a quieter local community-based centre to the respective villages and elegant neighbouring streets

¹⁶ **Residential Typologies** The context of the building plots in West Brompton, due to their proximity to low-scale existing residential buildings, creates the need for specific building typologies that respond to these constraints. The varied residential typologies proposed in West Brompton will include 4 storey townhouses with internal courtyards, duplex apartments with lower-ground levels and single-facing apartment blocks.

¹⁷ 3.5.10 **Scale and Massing:**

1. The scale and massing increases to meet the massing of the Broadway and High Street intersection. To the south the massing and scale reduces in comparison to the rest of the site, due to the low lying level of the masterplan and to respect the existing buildings on Lillie Road.
2. The buildings along West Brompton should be composed as a group and should not appear monolithic when viewed as a whole. The block structure seeks to create a permeable urban environment with framed openings looking into the village and out towards the surroundings.
3. The height of buildings step up towards the central node located at the intersection with the Broadway and the High Street.
4. All plots within West Brompton Village have elevations facing existing buildings. These plots have an additional internal boundary condition to aid in the stepping down of the scale and massing. Refer to Part 5 for plot specific internal boundary conditions.

a greater range of family housing and no reduction in the amount of social rented floor space.” (3.1.10.25)

3.5.3.9 Population & residence

Earls Court will broaden, diversify and increase housing choice and supply in West London. It proposes a total of 6,775 new homes across the two applications, making a major contribution to housing delivery in West London, including re-providing 760 homes on the existing West Kensington and Gibbs Green estates and an additional 740 intermediate-tenure affordable homes, making 1,500 affordable homes in total. These proposals respond effectively to the particular demands of the area, in particular delivering housing in an area where demand outstrips supply and affordability is a problem for many aspirant homeowners.

A broad choice of housing sizes and types is offered and for affordable housing the proposals expressly aim to diversify tenures, re-providing existing social rented housing within the two estates whilst recognising that even households with comparatively high incomes nationally struggle to afford homes in this part of London. (Outline Planning Application)

Phasing (3.4)

3.4.1 The development of the masterplan is split into 6 main phases of development:

- Phase 1 EC1
- Phase 2 North End Village (southern half)
- Phase 3 West Brompton Village and southern area of Broadway (including area around the Empress State Building)
- Phase 4 Central Broadway (eastern side of road)
- Phase 5 North End Village (northern half) and western half of West Kensington
- Phase 6 West Kensington Village (eastern half) and northern part of Broadway

Phased Landscape (3.4.3)

The Lost River Park will follow the masterplan phasing strategy and will be delivered as follows:

- Phase 1 0.825 ha
- Phase 3 0.155 ha
- Phase 4 0.395 ha
- Phase 6 0.625 ha

Existing Heights of Buildings

Philbeach Gardens 5-storeys

Eardley Crescent 4-storeys

Lillie Road 3 to 4-storey street edge structures, including the Empress State Building 31 storeys and the Hotel Ibis.¹⁸

North End Road is similarly varied with the 10 to 11-storey estate buildings juxtaposed with the 2 to 3-storey street edge buildings to its western side and the 5-storey Victorian terraces.

¹⁸ See LBHF Application: Ibis Hotel, 47 Lillie Road with the erection of part 5-storey, part 6-storey buildings, and alterations to the existing hotel tower to provide 260 additional hotel rooms and 12 hotel suites (C1), 9 replacement residential units (C3).

West Cromwell Road lacks containment and has no relationship to its neighbouring buildings.

Warwick Road with a consistent 4-6 storey building height with composed frontages.

Design Guidelines Section 2 Part 2 Access, Circulation & Movement

2.2.29 Existing Levels (Parameter Plan ECM2-PA-03-002 & 103):

Existing site levels vary from +3mAOD, in the western part to +12mAOD (Deck level of existing Earls Court Exhibition Centre). Much of the site is more low-lying than the surrounding roads. Also to be considered are the West London Line and District Lines cutting through the site at less than +3mAOD.

2.3.30 Proposed Levels (Parameter Plan ECM2-PA-03-006/018 & 107):

Future developments should adhere to the proposed levels by:

- Extending the deck level of +12mAOD, maintaining the existing EC2 deck and safely adding structure over and around existing train-lines in the development of the Lost River Park.
- Graduating levels from the highest point of +12mAOD to the level of surrounding roads so that the cross-site connections will be accessible and permeable.
- Levels will go from +7.5mAOD on Warwick Road to +12mAOD and +4.5mAOD on North End Road.

2.3.3 Massing Principles:

The massing should respond to the site context:

2.3.4 Low-rise buildings (6 storeys or less) are to be situated to the edge of the site to relate to the existing building's heights. Proposed houses will back onto existing houses to respond to the sensitive settings of Philbeach Gardens and Eardley Crescent. This arrangement allows the low-rise buildings to act as a buffer zone to the higher buildings towards the centre of the site.

2.3.5 Taller buildings are generally located nearer the Empress State Building.

Proposed Heights of Buildings



The buildings proposed at the rear of Philbeach Gardens and Eardley Crescent are too high and need to be reduced, when referring to existing heights the developers quote the number of storeys without mentioning that one of the storeys is a basement. They should respect the character and architecture of these Victorian streets, and not take light away from their gardens. The Empress State Building clusters will further dominant the present Empress Place. There must be issues of Enclosure and Light in Warwick and Empress Crescents.

Furthermore, there is a need to maintain the existing access road behind Philbeach Gardens for safety reasons and could impede fire engine access to buildings in Philbeach Gardens. There is also confusion as to the indications of the parameter envelope, and the drawings appear to be higher than the existing adjacent properties.

Affordable Housing

d) Affordable Housing and Delivery

6.13. Alongside the various market types and sub-markets the new homes will, in response to both the Council's identified needs, include affordable housing. For the Site Wide Development Option this in addition to new affordable provision will also comprise the re-provision of the existing homes.

6.14. The regeneration of the existing West Kensington and Gibbs Green Estates is central to delivery of the Site Wide Development Option. This represents a significant benefit of the Applications and is a direct response to the opportunities identified by LBHF of incorporating the existing estates as part of a comprehensive regeneration scheme to include new homes, job opportunities, better transport links and new community, leisure and amenity facilities. Critically because the proposals form part of the comprehensive proposals the Applicant is able to provide existing tenants certainty in terms of what they will be offered, when and where with no recourse to public subsidy or the uncertainties which underlie this – the proposals are solely funded through the development. (Housing Strategy document)

6.16 The approach that has been taken to the re-provision takes its direction from policy as to the key principles that should underlie any application, which includes regeneration of the existing estates. The guarantees made to residents by LBHF include:

- A permanent home in the area and moving of neighbours in phases to enable existing communities and friends to be kept together as far as practicable
- A decant strategy which is to be based on the principle that there will only be one move and no one will move out of their current home until a new one has been built
- Full involvement of residents in any plans or proposals
- For social rented tenants, rents will continue to be set by Government at a rate, which is affordable
- For home owners the chance to buy a home in the future development at a discount

(Housing Strategy document) Mixed Tenure)

a) Baseline Affordable Housing Offer

7.3 It is proposed that Site Wide Development Option will facilitate provision of 1,500 new affordable homes comprising:

- Delivery of 1,300 affordable homes on Site, within the red line boundary of Application 2, of which:
 - Up to 560 are provided for the re-provision of the existing homes on the two Estates
 - At least 740 are provided as net additional affordable homes (some of the 560 homes may be provided as net additional homes in the event that any of the existing residents choose not to take up the potential of a unit on site) to be apportioned between RBKC and LBHF
 - Payment to secure delivery of 200 affordable homes within the red line boundary of the Seagrave Road Car Park planning application for the re-provision of the existing homes identified for demolition (Housing Strategy document)

b) Re-provision of Existing Homes

7.5. The re-provision of the existing homes only occurs as part of the Site Wide Development Option. There are 760 existing homes proposed for replacement to facilitate delivery of the application proposals. The existing unit mix is set out in section 3 of this Statement. The development proposals have been prepared in the context of the key principles and offers made by LBHF to the existing residents and ensure that:

- All of the existing homes identified for replacement (social rent, RSL and the leasehold/freehold) are reprovided within the development area either as part of the 560 to be provided on site (within the red line boundary of Application 2) or through purchase of 200 homes at the Seagrave Road Car Park.
- All residents only have a single move – the use of Seagrave Road is critical to enabling this commitment to be met and to minimising to existing residents.
- There is no net loss of affordable housing floorspace. The existing 589 social rent homes will be reprovided on the basis of at least equivalent units and floorspace. The precise mix of the reprovion will depend on the individual household need at the time however the unit size mix of the first phases of decant to the Seagrave Road site will be set out in the application documentation – this is addressed in more detail in Section 8.
- Over and above the requirements of policy the Applicant also commits to providing a further 171 affordable intermediate tenure homes to ensure all of the existing leaseholders/freeholders have the option of moving into the new development. The value of the existing home will be transferred into an equity share of a new home. The owner will benefit from a 10% discount on the open market sale value and if the equity in their existing home is less than the amount

payable the unsold equity will be transferred to LBHF at nil cost with an assurance that no rent to be charged on the unsold equity. Where the existing home owners choose to move out of the development they forgo the opportunity to take up a new home within the development area and these homes will instead be transferred to LBHF at nil cost to be provided as net additional affordable housing (ie. the total number of affordable homes remains as 1,500 but the net additional affordable homes is more than the minimum 740 homes). More details on the offer made to leaseholders/freeholders is set out in Section 8. (Housing Strategy document)

7.6 All the 760 homes which replace the existing homes will be transferred to LBHF at nil cost. (Housing Strategy document)

c. New Affordable Housing

7.7. As part of the Site Wide Development Option the application proposals include 740 new affordable homes to be provided as intermediate tenures within the boundary of Application 2. It is intended that both Boroughs, LBHF and RBKC, will benefit from the potential to occupy these new homes, the basis for this apportionment is to be subject to further discussion. (Housing Strategy document)

7.8. In the event that the RBKC Only Development Option is taken forward (i.e. Application 1) then the Applicant will work with RBKC to ascertain an appropriate solution that is equivalent in terms of the impact on scheme viability. (Housing Strategy document)

7.9. In respect of the RBKC land (Application 1) the applicant has considered whether it is feasible to provide a financial contribution for affordable housing provision. The potential for this is subject to scheme viability and the planning gain requirements associated with the RBKC Only Development Option. It is intended that should this be possible it would be for the sole benefit of RBKC either by using the funds on site or, a better value for money option, utilised as a commuted sum either to further enhance affordability of those units to which RBKC are allocated within LBHF and/or to invest in facilitating off-site delivery of affordable housing on other strategic objective elsewhere within the Borough¹⁹. The potential benefits of a payment are consistent with the

¹⁹ **Commutated sums and delivery of affordable housing RBKC**

In the past 5 years the vast majority of affordable housing has been secured on-site, and financial contributions have only been sought in very exceptional circumstances. The table below shows the completed affordable housing units, and the total completions of housing. This varies from year to year, and there is no direct correlation between the affordable completions and total completions

<u>Year</u>	<u>Affordable Completions</u>	<u>Total Completions</u>	<u>Affordable completions as % of total</u>
2005/6	66	203	32.5
2006/7	64	361	17.7
2007/8	0	245	0
2008/9	99	215	46
2009/10	22	327	7

The financial contributions that have been received within the past 5 years are amounts from:

185-187 Warwick Road (January 2006) = £25,000 and
13 Brompton Place (March 2006) = £175,000

There are, however, a number of outstanding contributions, which have been negotiated in this period of time, but not yet received, as they have not reached their 'trigger' point yet. These are set out in the table below. Contributions must be spent within the terms of their agreement, which is generally to provide

strategic aims as set out in the RBKC Private Sector Renewal Strategy (2008-2013)
(Housing Strategy document)

e) *Affordability*

7.12 At a time when the definition of affordability is subject to change it is critical to ensure i) affordable homes are subject to appropriate controls to ensure their affordability and ii) there is sufficient flexibility within these controls to respond to future changes. (Housing Strategy document)

7.13 Homes re-provided as social rent tenures will continue to have their rents set by LBHF. In addition there are guarantees provided by the Applicant for compensation arrangements alongside an enhanced level of fit out ensuring existing tenants benefit from the development proposals. Tenants will be living in new homes constructed to high standards, for example Code for Sustainable Homes Level 4, meaning many households will face lower energy costs. (Housing Strategy document)

7.14 Similarly the arrangements in place ensure that existing leasehold/freehold owners will not be any worse off financially or any more financially exposed than they are occupying their present home. (Housing Strategy document)

7.15 With regard to the new intermediate homes all will be subject to the upper affordability thresholds set by the GLA with a series of bands to ensure a range of affordability can be achieved. These bands are able to be amended subject to the minimum price being achievable (see below) to enable the intermediate housing to respond to new products, funding opportunities and initiatives as and when they arise. The emphasis on flexibility will also provide the potential to properly respond to aid mobility within the local housing market, potentially enabling existing social rented stock to be released as households move up the housing ladder – reflecting national, regional and local aspirations to promote home ownership. Over and above this the approach mirrors that of Central Government and the introduction of Affordable Rent ensuring people pay what they can afford towards their housing costs and having the potential to use affordable housing as a means for creating subsidy for facilitating other enhanced affordability elsewhere in the scheme or off site if appropriate. (Housing Strategy document)

7.16. The Applicant proposes a baseline commitment to a range of incomes that homes will be affordable to, rather than seeking to specify types of intermediate tenure to be provided:

- One third to be targeted to households with incomes of £35,000 and under
- One third to be targeted to households with incomes £45,000 and under
- One third up to the thresholds allowable in the London Plan ie. £61,400 and £74,000 (Housing Strategy document)

i) *Enhanced Affordable Housing Offer*

7.21 Over and above this baseline offer the Applicant is exploring the potential to for an enhanced ‘policy plus’ offer in respect of the affordable housing for the Site Wide Development Option. This is potentially relevant to both Development Options and responds to the direction of travel of policy where in response to the significant reductions in public subsidy innovation and flexibility is encouraged. The approach being explored by the Applicant embraces and responds to this challenge positively. A mechanism is proposed which is applied to the affordable housing units given the financial uncertainty associated with this element in light of recent cuts in public subsidy and in view of the changing policy basis relating to tenure, tenancy terms and cost to occupiers. The revenue assumed as part of the viability process excludes grant. One of

affordable housing within the borough. Total amount in the RBKC Commuted sums from chart above= £3,254,000

the benefits of the proposed mechanism is that if grant is forthcoming in the future this or any other additional value released from these units can be captured and reinvested in the affordable homes over the duration of the development. (Housing Strategy document)

	Social Rented LBHF	RSL	Leasehold/Freehold	Total Existing Homes
1 Bed	163	7	21	191
2 Bed	212	19	85	316
3 Bed	121	25	52	198
4 Bed	35	7	13	55
Total	531	58	171	760

approx. 16% of homes are estimated to be over crowded

Tall Buildings^{20, 21, 22, 23, 24}

On the site there are two areas with taller buildings than in the surrounding areas: the beginning of the High Street and the Empress State Buildings cluster, these will eradicate our present sky-lines from the historic Brompton Cemetery to Cromwell Road, and from the east side of Warwick Road to North End Road. These buildings by definition will create 'overlooking' and loss of daylight to Philbeach Gardens, Eardley Crescent, Empress Place and the terrace of houses 62-68 Lillie Road.

In their proposals they reference the City and Canary Wharf in regard to building heights, which by their character are not residential, and therefore are not relevant to their statement:

"3.7.14. The building scale and mass will be referential to its surroundings and this will result in lower, smaller townhouses places adjacent to the site's boundary."

2.3.5. Taller buildings are generally located nearer the centre of the site, around the existing Empress State Building in a composed cluster adjacent to primary routes.

2.3.6. No new buildings are to be higher than the height of the Empress State Building unless otherwise agreed.

²⁰ 4.20 The views within the cemetery and looking out over the main site and Seagrave Road car park are sensitive. *Draft RBKC SPD*

²¹ **Policy 7.4 Local Character**

- c. That architecture 'is human in scale'
 - d. That architecture 'is informed by the surrounding historic environment'
- London Plan 2009*

²² **Policy 7.7 Location and design of tall and large building**

- D Tall buildings should not:
 - b. Impact adversely on local or strategic view
 - c. be encouraged in areas that would sensitive to their impact. Such areas might include conservation areas, the setting of listed building, historic parks and gardens
- London Plan 2009*

²³ **7.12 London Implementing the London View Management Framework**

It is suggested that Planning Decisions should include:

- A. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly and prominent to the detriment of the view, block a view or create an intrusive element to the view. *London Plan 2009*
- C ...should only be considered in areas whose character would not be adversely affected by the mass or bulk of a tall building... *London Plan 2009*
- D ...not impact adversely on local views... *London Plan 2009*

²⁴ 7.24. London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality. Natural landscapes can help to provide a unique sense of place. *London Plan 2009*

2.3.7. A general datum has been established along the principal routes of the High Street and the Broadway. A regularity of the shoulder height unifies the streetscape whilst variety is created by a series of different set-backs and pop-up features above.

2.3.8. Mid height buildings should be kept away from the eastern, western and southern edges of the site. The development's presence on the route to central London (A4 - West Cromwell Road) is to be marked by using mid-height buildings to the road and around a new public space: Cromwell Place. Mid-rise buildings are generally located on primary routes and may consist of 'pop-up' taller elements to act as focal points within the masterplan.

2.3.9. Tall Buildings Around the Empress State:

Where proposed buildings sit close to the boundary, their massing should compliment the existing buildings. Deeper into the site the buildings should increase in height to respond to street hierarchy, public space provisions, townscape considerations and the Empress State Building.

2.3.10. An increase of massing up to, but no taller than the Empress State Building, creates an inviting skyline. New proposed towers will create a cluster and a composition with the Empress State Building, creating a focal point for the site. This cluster will provide a unique new reference point in terms of way finding throughout the site and act as a symbol of the new development without competing with the established height of the Empress State Building.

2.3.11. Massing proposals should adhere to the approach of placing taller buildings on wider streets and green spaces and smaller buildings in areas with more intimate proportions. Generally tall buildings should relate to garden squares where applicable, whilst mid-height buildings should be located on principle streets and the Lost River Park, and low to medium rise situated towards the development edges.

There are no illustrative representations of the impact on the skylines of buildings on Eardley Crescent, Kempsford Gardens, Earl's Court Square or Warwick Road. Representative images of the impact of the site on Earl's Court, the red lines indicate the proposed height of the buildings.



Longridge Road looking west (From CapCo outline planning application LBHF)



Nevern Square south looking west (From CapCo outline planning application LBHF)



St Cuthbert's Church looking west (From CapCo outline planning application LBHF)

Conservation Areas

The CofE Chapel, Brompton Cemetery; The Entrance Gates and Screen to the cemetery on Old Brompton Road; West Brompton Station; 30-52 Earl's Court Square; Warwick Road entrance of Earl's Court Station and Ticket Office; Church of St Cuthbert's, Earl's Court Village and 62-68 Lillie Road. Brompton Cemetery, Philbeach, Nevern Square, Earl's Court Square and Courtfield Conservation Areas. (Outline Planning: Local Context: Listed Buildings)

Existing Traffic Flows

Public Realm Roads

Classification of the roads*

West Cromwell Road: Major Road

Warwick and Earl's Court Roads: Red Routes

Old Brompton Road: Primary Road

North End Road: Primary Road

Lillie Road: Primary Road

*(Local Context: Public Realm)

Our roads cannot maintain any more traffic. The North End Road will become gridlocked, putting the future of the market put in jeopardy, and Lillie Road cannot take more traffic, all of which will put additional pressure on the Earl's Court One-Way System (ECOWS). This will ultimately have a knock on effect on the whole of this part of South-West London: Brompton Road, Cromwell Road, from Shepherd's Bush down to the Embankment.

With the proposed redevelopment of 44-acres on the White City site, the 7,000 new residents north of Cromwell Road and south of High Street Kensington, and the

808 new units on the Seagrave Road Car Park site, this will make for an increased traffic volume that this area simply cannot sustain, and requires a traffic strategy for the wider area.

The Broadway and the High Street should be open to through traffic at all times, and the issue of the rat run of Eardley Crescent should be addressed although roads within the site will have a limit of 20mph.

Walking

The Pedestrian Crossings section do not include the some of the dangerous crossings or the timings, which are already an issue, and some without Audible or Rotating cones for the sight impaired:

- Earl's Court Road junction with Cromwell Road
- The timing on the crossing by Earl's Court Road Station on Earl's Court Road
- The lack of Pedestrian priority signing at the junction of Finborough, Old Brompton and Warwick Roads.
- The traffic island opposite Tesco's, West Cromwell Road.

6.5. *Earls Court Road*

6.5.1. In some locations and despite the adequate overall footway widths, the usable footway width is restricted as a result of street furniture, "clutter", and private premises signage.

3.1.3.9. The belief that urban developments should blend in with existing urban settings and become thriving, vibrant neighbourhoods in their own right therefore making integration with existing communities a priority by creating four urban Villages – Earl's Court, West Brompton, North End, West Kensington.

A4 West Cromwell Road

6.5.4. The A4 West Cromwell Road is a heavily trafficked dual carriageway. The section east of Warwick Road has a more pleasant pedestrian environment with footways exceeding 2m in width and residential frontages along the link.

6.5.5. The section west of Warwick Road is dominated by high volumes of traffic and parapet walls / guard railing which limits pedestrian crossing opportunities and detract from the pedestrian environment.

Street	Request Box	Tactile Info	Audible Info	Rotating Cones
Redcliffe Gardens – north of Fulham Road	✓	✓	⊘	⊘
Earls Court Road – north of Earls Court Road / Bramham Gardens / Earls Court Square junction	✓	⊘	⊘	✓
Fulham Road – east of Finborough Road	✓	✓	⊘	⊘
Old Brompton Road / Warwick Road	✓	⊘	⊘	⊘
Lillie Road (Lillie Road Bridge)	✓	⊘	⊘	✓
Warwick Road	✓	✓	⊘	✓

Chart: Pedestrian crossings Provision of sensory and mobility pedestrian chart (CapCo Outline Planning RBKC)

Cycling

Within the proposed developed area there is provision for safe cycling but this does not extend into the roads that the site will feed into, as with increased traffic from the development there is greater need to consider Cycle Lanes on the Earl's Court One-Way System and Cromwell Roads.

Car Parking within the site

Earl's Court site: 4335 parking spaces

Seagrave Road site: 485 parking spaces

Transport ^{25, 26, 27}

With the increased population, the already crowded platforms at Earl's Court, refurbishing the tunnel under the road from the exhibition site merely provides safety for their residents and visitors. The change of passenger flows with the loss of the exhibition visitors will only create additional pressure at peak times. The new permeability of the site will mean that there will be additional passengers who would choose to use a Zone 1 District/Piccadilly Line Station. The charts within the Outline Planning Document only specify passenger flows on the completion of the Earl's Court part of the development.

West Brompton Station is a listed building, and even with long platforms it will create fuller trains before the trains get to Earl's Court, and the same if they include West Kensington as a Piccadilly line train station. Earl's Court is also a listed building, and so there is no room for an extension of the platforms. There is need to increase the staff and gated secondary on the south side of Old Brompton Road by the bridge.

With the population of this site being approximately conservatively @ 6,775 units x 2.3 persons = 15,600, 7,000 new jobs, plus the visitors to the hotels, the 7,000 new residents north of Cromwell Road, and the approximately 1,616 new residents at Seagrave Road this presents an enormous increase in potential transportation population.

The projections of traveller use goes to 2021 when the first phases will be completed, but fail to consider that with the increased permeability of the site that more

25	Earl's Court	21.21 million entries and exits
	West Brompton	4.17 million entries and exits NOT INCLUDING RAIL/TUBE INTERCHANGE
	West Kensington	4.53 million entries and exits
	Counts – 2010 – annual entries and exits	© London Underground Ltd, 2011

26 6.14 Allowing development, wither individually or cumulatively, that would place an unacceptable burden on either the public transport network and/or the road network would be contrary to the objective of sustainable development.

27 **Policy 6.3 Assessing transport capacity**

Planning Decisions

- A. Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed.
- B. Where existing transport capacity is insufficient to allow for the travel generated by proposed developments and no firm plan exist for an increase in capacity to cater for this, borough should ensure that development proposal are phased until it is known these requirement can be met, otherwise they may be refused. The cumulative impacts of development on transport requirements must be taken in account.
- C. Transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidance for major planning applications.
(There studies between 7.00-10.00am indicate that there is 40% (approximately) capacity for finding a seat!)

6.14. Allowing development, wither individually or cumulatively, that would place an unacceptable burden on either the public transport network and/or the road network would be contrary to the objective of sustainable development. *London Plan*

travellers are likely to want to go from Earl’s Court Station in Zone 1 with the Wimbledon, Richmond, and Ealing Broadway connections as well as the Piccadilly line.

The recent study by TfL established that there was seat capacity between 7.00-10.00am of approximately 40%. Also fails to assess the on-ward impact on Gloucester Road, South Kensington and Sloane Square stations.

5.6 Future Service Improvements

5.6.1. The public transport improvements which are already proposed by the Mayor’s Transport Strategy and which have direct implications on the surrounding public transport networks have been derived through interrogation of LTS and the Central and Northern Sub Regional Railplan (CNSRRP) model. The Railplan model includes:

- Upgrade of the Piccadilly and District Lines;
- West London Line upgrade;
- Crossrail 1

5.6.2. The upgrades of the Piccadilly and District Lines involve an increase in frequencies and improvements to rolling stock to deliver increased capacity. Table 5.7 illustrates the average number of Trains per Hour (TPH), the corresponding number of available seats in the peak three-hour period and the corresponding crush (7 passengers per m²) capacity.

As the target market for the new homes on the development are for high-earners and families there will be more travellers on the platform means that the already saturated conditions of the station will be increased at peak times to a point which could be classified as dangerous and the renewed permeability of the site, which will encourage residents to go to Earl’s Court station in preference to nearer stations due to its links.

LUL Destination	Frequency (trains per hour)
District Line – Wimbledon	13
District Line – Edgware Road	6
District Line - Upminster	5
Total	24

LUL Destination	Frequency (trains per hour)
District Line – Ealing Broadway	8
District Line – Kensington Olympia	3
District Line – Richmond	6
District Line – Wimbledon	13
District Line – Edgware Road	6
District Line - Upminster	14
Piccadilly Line – Heathrow Terminal 5	6
Piccadilly Line – Uxbridge	4
Piccadilly Line - Cockfosters	18
Total	78

5.6.4. The upgrade of the West London Line results in a significant increase in capacity, delivered through changes to rolling stock and service frequency. A summary of TPH, seats per three-hour peak period and associated capacity is set out in Table 5.9.

Table 5.9: West London Line Capacity

TPH		Seats per Peak Period	Capacity per Peak Period
WLL Northbound	3.7	2,568	6,905
WLL Southbound	4.3	3,039	8,221

Table 5.10: 2026 West London Line % Changes in TPH and Capacity

TPH		Seats per Peak Period	Capacity per Peak Period
WLL North	62%	24%	97%
WLL South	40%	5%	65%

	Existing	2021 Base	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Underground Passengers						
Earls Court Entries	8,880	10,535	11,010	11,099	12,329	12,409
Earls Court Exits	6,641	7,474	7,873	7,862	8,849	8,866
Earls Court Totals	15,521	18,009	18,883	18,961	21,178	21,275
West Brompton Passengers						
West Brompton Entries	767	1,001	1,001	1,139	1,515	1,648
West Brompton Exits	1,634	2,036	2,050	2,081	2,979	2,995
West Brompton Totals	2,401	3,037	3,051	3,220	4,494	4,644
West London Line Passengers						
West Brompton Entries	295	659	673	695	851	874
West Brompton Exits	723	1,090	1,109	1,130	1,481	1,488
West Brompton Totals	1,018	1,749	1,781	1,826	2,332	2,362

	Existing	2021 Base	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Underground Passengers						
Earls Court Entries	8,032	9,394	9,858	9,890	11,396	11,421
Earls Court Exits	7,178	8,842	9,213	9,242	10,801	10,828
Earls Court Totals	15,210	18,236	19,071	19,132	22,198	22,249
West London Line Passengers						
West Brompton Entries	1,082	1,607	1,605	1,648	2,644	2,663
West Brompton Exits	1,037	1,379	1,375	1,471	1,903	2,019
West Brompton Totals	2,119	2,987	2,979	3,119	4,547	4,682
West London Line Passengers						
West Brompton Entries	686	1,551	1,580	1,574	2,028	2,043
West Brompton Exits	297	1,029	1,027	1,092	1,240	1,288
West Brompton Totals	983	2,580	2,607	2,666	3,268	3,331

Overground Rail

The Development would improve the pedestrian crossing to West Brompton station, where London Overground and Southern Trains run approximately 10 two-way mainline trains per hour in the peak. The West London Line upgrade is being implemented and increases peak capacity by 97% northbound and 65% southbound.

The Railplan analyses show that overground rail trips due to the Development would result in a negligible change from the 2021 Base (i.e. the situation in 2021 with no development).

Environmental Impact Studies

1.190 It is recognised that the demolition and construction works will interface with existing residential neighbours. The closeness of the Site boundaries and the proximity of the residential housing on Philbeach Gardens and Eardley Crescent in particular will require a fully encapsulated perimeter scaffold to EC1 to provide a visual shield, and also to provide human and environmental protection during deconstruction operations. Further mitigation measures that will be implemented to reduce nuisance from demolition and construction noise, vibration, dust, and the control of water to nearby residents are discussed below.

- Consultation with the general public and local community on the proposals for the redevelopment of the Earl's Court Site and input into the Construction Environmental Management Plan (CEMP);

This project is going to take 20 years for the overall site, and therefore given the level of night time working that will be required on this site, it is important that there are safeguards in place. In their assessments of impacts they mention that that the effects will be Negligible to Moderate Adverse – or reversible, but if the on-going works are for 5 years in the RBKC part of the site, then there must be some further assessments undertaken on the impact on residents lives and that there are resolutions in place before works start.

Asbestos

“Handling and disposal of asbestos and contaminated soils – ongoing Site investigation work and measures for soil clean up as necessary, procedures for the storage of oil and hydrocarbons, methods for dewatering of excavations and appropriate piling techniques.”

The developer has to provide detailed proposals for the demolition of the exhibition centres that meet with RBKC, LBHF and Health and Safety before the granting of planning permission.

Air Quality and Pollution²⁸

Earl’s Court, Warwick and Cromwell Road junctions are some of the most polluted in Europe, and although the individual developments are required meet the targets set out in the London Plan they will by their presence increase the overall pollution within the area.

Poor Air Quality has a detrimental effect on the health and well being of residents, visitors and workers.^{29,30}

Noise and Vibration³¹

1.199 As deconstruction/demolition and construction activities are predicted to result in impacts ranging from negligible to moderate adverse for noise, air quality and dust emissions, it is reasonable to predict that there will be adverse impacts on nearby sensitive receptors for the combined effect of individual impacts. This impact will be temporary in nature (i.e. reversible), lasting for the duration of the deconstruction/demolition and construction programme and is considered to be normal for such a large-scale development. It is considered that the benefits to the local community and wider Opportunity Areas once the development is complete will outweigh the temporary adverse nuisance impacts experienced through the deconstruction/demolition and construction programme of works.

Given the acknowledged proximity of Philbeach Gardens and Eardley Crescent, the necessity to undertake Night Time working, the length estimated at 5 years, the impact of building works must have effective safeguards, and that Environmental Health legislation should be incorporated and that the costs incurred should be covered by a S106 agreement.

Also the pre-existing problems of vibration that affect Nevern, Kensington and Wetherby Mansions are looked at, and that there are safeguards put in place. These

²⁸ “Long-term exposure to air pollution may have contributed to all 15,800 deaths due to cardiovascular causes in London in 2009 (i.e. one in three of all deaths) at an average additional loss of life for each of these adults of some three years at typical ages (e.g. 15% below age 65)

New scientific research indicates that children exposed to higher levels of traffic-related air pollution at school and home are at increased risk of developing asthma.

Scientists say living near roads travelled by 10,000 or more vehicles per day could be responsible for some 15-30 per cent of all new cases of asthma in children; and of COPD (chronic obstructive pulmonary disease) and CHD (coronary heart disease) in adults 65 years of age and older.” (Clean Air in London, 21 June 2011.)

²⁹ “The Mayor of London of London told us last June that, using the language used for alcoholism, obesity and smoking, an estimated 4,267 deaths in London in 2008 were attributed to long-term exposure to dangerous airborne particles (PM25).” Simon Birkett, Clean Air for London

³⁰ “Already more people die prematurely in London than did during the pea-soup smogs of the 1950s, thanks to growing traffic levels. Asthma affects some 700,000 people and children growing up near busy main roads have permanently impaired lung function.” Mike Tuffrey, London Assembly Member

³¹ Quality and ES Volume 1, Chapter 15

buildings should be inspected prior to the demolition and construction phases, so it will be easier to determine whether or not structural damage has been caused by the development.

Road Vehicle Movements

8.6.2 It is anticipated that there will be 3 to 4 vehicular access gates in operation at this time. On this basis, the frequency will reduce to a delivery every 30 minutes per access gate.

Other methods and site have been assessed but the conclusion is not clear, and the method of demolition not stated.

Water Pressure and Sewerage³²

- The local drainage network to the Earl's Court Site has a history of causing local flooding in the surrounding area. The risk is isolated to the basements and basement courtyards as there have been no reported instances of flooding from surcharging manholes.
- Flood Risk from the River Thames: EA mapping identifies that the majority of the Earl's Court Site lies within Flood Risk Zone 3. Flood Zone 3 (as defined by the EA) is an area with a high probability of flooding during a flood event with a greater than 0.5 percent chance of occurring annually (1 in 200 year event). A small part of the Earl's Court Site, located in the south-west bottom corner of the Site is located in Flood Risk Zone 2 (medium probability of flooding). The remainder of the Earl's Court Site, in and around the EC1 and EC2 buildings, lies within Flood Zone 1 (little or no risk), due to their siting on an artificially raised platform. Whilst there are carparking areas below EC2 at ground level and within the basements of EC1, these are not considered.
- Flood Risk from Groundwater: The geology of the Earl's Court Site and surrounds consists of London Clay overlying a Principal Aquifer. This impermeable cap to the Principal Aquifer should prevent incidents of deep groundwater flooding. The London Clay is overlain with superficial gravels at the Earl's Court Site, which contain shallow groundwater and a Secondary A Aquifer – there is also the possibility that they may contain a perched water table. If following heavy rainfall, the water table within this gravel layer rises, localised groundwater flooding

Earl's Court Square already suffers from no water between 11.00pm – 3.00am in the morning, and reduced water pressure. Elsewhere in Earl's Court the drains cannot cope with the volume of heavy rainwater and there are water leaks in a number of places. There is nothing in the Outline Planning Application to suggest that there will be any change or reduction of water pressure with this new development.

Flood Risk

Due to the different topographies of the site, there is no 'the site is located within Flood Zone as defined by the Environmental Agency', with a high probability of flooding. Given the problems associated with heavy rainfall in the area around Counter's Creek with road and homes north of this site already being flooded that it is important that the amount of paved areas are reduced, and that there is the facility of drain off.

Telecommunications, cable and satellite

The Council should withhold permitted development rights on the installation of satellite dishes. There are already concerns about the quality of mobile telephone reception and digital TV reception in the area, so more information is required on what is being done

32 Quality and ES Volume 1, Chapter 15

not to decrease the existing quality and whether the present situation could be improved.

Culture

The developer's concept of Culture:

- Street Life
- Food and Retail
- Entertainment
- Streetscape
- Open Space
- Quality Design
- Community hubs/experience
- Artistic practice
- Cultural business/entrepreneurship

Public Art

There should be Resident Consultation before the works are commissioned and "cultural masterplanning".

Public Art Steering Group

What would be the criteria of eligibility for membership of this group? As with the consideration of Public Art projects there should be residential involvement, as I was unaware of the developer's Consultation and Engagement programme in relation to Public Art.

Maintenance and Decommissioning

What are the estimated costs for the maintenance of the Public Art that RBKC will be responsible for this and the decommissioning of artwork? Will this be Borough or Opportunity Area boundary based?

Creative Projects

That it is essential that existing artists, sculptors, musicians etc. from the area are included.

History Project

That older residents are included in the 'history collecting project' both verbally but also as contributors to the archive image bank. This could be achieved via Age Concern, New Horizons and Open Age.

Lead Cultural Partner

This has not been addressed

The main area designated for Culture within the plan is around the Empress State Building. In the streets they would adopt a 'Via Tortona' concept would have exhibition space for temporary exhibitions combined with small shops for artisans – this is predominantly sited outdoors.

Their solutions include: Flexible space with pop-spaces for temporary use, designed space for possible lead creative tenant, Sculpture Trail, Text Trail to aid navigation,

They intend to have a Build-Up Creative Programme: Temporary Hoarding Project, host smaller events, specialist 'Pop-Up' market and cinema, open air concerts, temporary exhibition and growing spaces. (The Earl's Court Cultural Placemaking Strategy)

A five-screen cinema should be included in the Cultural provision.

Open Access Areas

17.7 hectares of open space within the existing site, (64% of the site area) meaning 36% of the site is built on. Residential amenity area forms 3.1 hectares, (11% of the site area); of which 0.5 hectares is utilized as children's play space. Only 7.8 hectares of open space or 28% of the site area is publicly accessible; therefore the remaining space is inaccessible, forming a large area of under utilized open space in West London. (2.3.3.7)

Communal Gardens at Roof Level

The aim is to provide a minimum provision of 45% of building footprint at roof level, which is a balanced combination of both green/brown roof and recreational amenity roof provision. A minimum of 1.58 ha should be provided as either green/brown roof.
3.9.45 Green Roofs

4.10.3. Minimum amenity space for family dwellings = 36 sqm/per residential dwelling unit

Minimum amenity space for non-family dwellings = 14 sqm / per residential dwelling unit

4.10.38. The roof level garden strategy aims to provide a well-balanced combination of both green and recreational amenity space across the development. Living roofs comprise of two main types: green/brown roofs and recreational roofs. Green roofs range from intensively to extensively vegetated. Recreational roofs provide amenity benefit. Communal gardens at roof level should sensibly balance amenity and ecological landscape.

4.10.39. Roof amenity space should adhere to all of the principle design guidelines established for the residential communal gardens at grade. Gardens at roof level are to be provided as communal gardens accessible by the residents of the related dwelling to create visually attractive, wind protected, safe and accessible residential amenity space.

4.10.44. Communal gardens at roof level should maximise the amount of amenity space (between 50% to 55% within appropriate roof top areas), integrating amenity use with other roof top space uses including:

The inclusion of recessed balconies, winter gardens and Juliet balconies, use of flat roof space as terrace/roof Garden, Green and Brown roofs in the Open Access calculations is disingenuous, as it is advised that Sedum roofs cannot be walked on and therefore should not be included in the 14.01 hectares of Total Area of Amenity Space.

Trees

The masterplan proposes a phased replacement of existing trees over a 20-year period. Existing trees to be retained or removed through a managed phased programme in line with the landscape phasing strategy. The masterplan proposes to progressively increase tree numbers across the regeneration area from the 331 existing trees to approximately four times this number. (3.4.9)

Play Space

This seems not to consider that families might have different aged children, and are set apart. There is only provision for 5 a side football, without adequate space for energetic young adults there is the possibility of in-built anti-social behaviour. There does not appear to be the same distribution of in the southern section of the development.

Age Group	No.of Children	Min.	Walking Distance
0-4	366	3,656 sqm	60m radius/100m straight line
5-11	552	5,524 sqm	240m radius/400m straight line
12-16	358	3,583 sqm	600m radius/800m straight line

Private and Intermediate	%	Social	%
0-4	59	0.4	28
5-10	27	5-10	42
11-15	14	11-15	30

Table 4.11.4. Child Age Group

Total Open Space

Total Area of Open Space = 15.25 hectares

Proposed Area of Green Space = 6.17 hectares

Proposed Area of Hard Space = 9.08 hectares

Open Space - Public

Total Area of Publicly Accessible Space = 10.88 hectares

Proposed Area of Publicly Accessible Green Space = 2.88 hectares

Proposed Area of Publicly Accessible Hard Space = 8.00 hectares

Amentity – Public / Private

Total Area of Amenity Space 14.01 hectares

Proposed Amenity at Grade – Public, Private & Communal = 6.11 hectares

Proposed Amenity at Roof Level – Communal = 3.60 hectares up to 45% of roof areas

Proposed Private Balconies & Terraces = 4.30 hectares

Open Space

Lost River Park = 2.00 hectares

Exhibition Square = 0.30 hectares

Garden Squares = 0.68 hectares

Total Area of Play space

Play Space = 1.49 hectares

Age Group 0-4 = 5822 sqm

Age Group 5-11 = 5524 sqm

Age Group 12-16 = 3583 sqm

Lost River Park

This linear park will be heavily overshadowed by the tall buildings around the High Street and this with the soil depth at 1m deep the planting will not have much chance of survival. At its widest point it is 90m wide and will become a place that people will

avoid, particularly at night. It does not allow for active play for more than 5 a side Football.

It is hard to determine from the proposals how much of the calculations are based on Winter Gardens, Balconies, Roofs, and green walls. The ratio of Publicly Accessible Green Space and Public Accessible Hard Space should be looked at, with Climate Change requirements and 'Heat Island' affect that more surface greening should be included and a better balance achieved.

West Brompton Station

The area alongside platform 4 should be retained and maintained as a Wetlands area, with access to the site under the railway bridge to link the two areas.

Education

This does not take into account the children growing up and they anticipate through the Play Strategy that there will be 358 12-16 year old children. Chelsea and Holland Park Academies are filled to capacity. North Kensington Academy is being built to respond to local area educational needs.

1.215. In total the child yield calculations indicate the requirement for 108 part-time nursery places, 303 primary school places, and 121 secondary school places. (LBHF Outline Planning Application)

The baseline information indicates that there is no spare capacity in local education provision in LBHF. In RBKC there is an existing short fall of Secondary school places, and the figure of 121 secondary places in 1.215 conflicts with the information supplied in Table 4.11.4. Child Age Group of their projection of 358 children between 12-16.

Employment

4.2 The SPD sets out the framework for delivering this vision and for increasing, amongst other things, employment opportunities for local people, by creating a minimum of 7,000 new jobs. It recognises that office-based employment is currently a significant contribution to employment in the ECWKO and that a significant quantum of office floorspace is required to enable this – ranging from 90,650 sq m to 194,250 sq m outlined in three development scenarios. (Office Market Assessment)

White City

4.3.8. Proposals for the 44-acre White City Opportunity Area are still evolving. (Office Market Assessment)

4.3.13. Parts of the Opportunity Area falling within the LBHF suffer from high unemployment with rates as high as 28% compared with a borough average of 14%. (Office Market Assessment)

This has been discussed, and the amount of office space specified as being required is considered to be high given the problems associated with West London office developments, with unfilled office and there should be included in the conditions attached to the granting of the Outline Planning consent that no offices can have a change of use from Office to Residential.

Conclusion

That the Outline Planning Application for this site should be seen in conjunction with the Seagrave Road Car Park development and not separately as it is interdependent.

That the presentation of the Outline Planning Application is hard to access with access to a computer, some of the files did not open, and no paper copy appears to be available.

Due to the generous room sizes of the residential (the unit sizes on the West Kensington Village site are smaller) it is possible that the estimated figures of the population are understated, and therefore the residential amenity are under specified in the proposals.

Spatially the site does not replicate the existing area: with 13m between the back of some buildings in Philbeach Gardens to the rear of Warwick Crescent. The space allowed within the buildings in some parts of the site too narrow e.g. 12m between Warwick Crescent, with 3 storeys on the site side and the 10-12-storey buildings at the start of the High Street.^{33, 34, 35} This must constitute light problems for both the streets and the residents of these buildings.

The unbroken 8-storey line of buildings will overshadow the Lost River Park. The overall heights of the developments should be reduced particularly when adjacent to Eardley Crescent and Philbeach Gardens and be the same roof heights. These properties should be reserved for residential use and not mixed use, and the heights should not exceed the present rooflines. The architecture, scale, and density should be in keeping with and not detract from the adjacent areas.

The result of this development will diminish the status of Earl's Court Road as being the 'heart' of the community east of the railway line, with the subsequent damage to the existing businesses on which we depend. The buildings on site will dominant, they are not of a human scale and will be out of character, rather than linking the two areas and are out of keeping with the pre-dominant Victorian architecture. The removal of the Earl's Court Exhibition, which has been an essential part of this area's identity, is to be replaced by a 'Brand'. There is no Business Plan to retain the existing businesses in Earl's Court Road that provide for the present residential amenity.

I feel that there is a conflict of interest with TfL's involvement with this scheme that makes for such densities in what is already one of the most densely populated areas in the Borough without any viable solutions to the Tube stations or net works. The increase of trains proposed will be taken up by the projected 21% increase as more people travel by tube.

Without a constructive, strategic plan for the road traffic, this area will become gridlocked, and therefore the Air Quality will become worse. This should have incorporated a far wider area and include the proposed redevelopments at Seagrave Road, north of Cromwell Road and at the 44-acre White City site.

In a development of this size and impact, it is essential that the Water, Water Pressure, Sewage and Drainage be addressed within the overall assessment of the site.

Their targets for Sustainability, Climate Change, and Air Quality might tick the boxes on site but will overall increase Pollution levels for the area, particularly for the residents of Warwick Road, Kensington and Nevern Mansions, who will bear the brunt of the increased traffic volumes.

Hammersmith and Fulham, as in Kensington and Chelsea have long Council waiting lists and this development will yield no additional Affordable Rented Housing, apart from the decanting and rehousing of the Estates.

³³ 3.2 New development will be seamlessly integrated into the existing urban fabric respecting its built form, pattern of streets and open spaces and character. *RBKC Draft SPD*

³⁴ 3.11 Requiring development... to respect the quality, character, setting, identity and appearance of the surrounding context particularly with regard to built form, height and scale. *RBKC Draft SPD*

³⁵ 3.5 which requires all new housing to 'enhance the quality of local places, taking into account physical context, local character, density ...' The London Plan 7.5

There is a working party who are examining how the Draft SPD can be strengthened, but there needs to be more evaluation of how this will impact the adjacent areas as the Councils' Transport and Traffic studies are not yet available.

Linda Wade
Liberal Democrat, Earl's Court Ward Councillor
Monday 12 September 2011

Charts, graphs, statistics, photographs were taken from the CapCo Outline Planning Application Submissions for the sites.