

This is the first time in the Supplementary Planning Document consultation process that **Transport** and **Traffic** sections of the document have been gone into in such depth. Although there are indications that the surrounding areas have been considered, further work has to be undertaken to ensure that the impact of the Development of the site does not create additional pressures on the existing residents.

## Traffic

Interestingly, the scenario the transport impacts of the development are based on 5,560 homes and 12,165<sup>1</sup> jobs rather than the present Outline Application by the developers of 6,775 homes and 7,000 jobs<sup>2</sup>. **10.7** states that significant parts of the highway network are operating at 90% capacity with a number of traffic delays at junctions around the Opportunity Area (OA), 'including at all four corners of the site, during peak periods and weekends.' And in **10.57** that 'even without development in the OA traffic levels in the local area are forecast to increase significantly from 2009 to 2031...due to the removal of the Western Congestion Charging Zone, as well as forecast growth in population and employment.' **10.58** 'The strategic transport study estimates that development would increase traffic levels within the OA by around 3% in the AM Peak and 2% in the PM but is not transparent as to the impact it would have on the Earl's Court One-Way-System (ECOWS) and North End Road. The projected reduction on completion in 2031 is based on the use of the north-south road from West Cromwell Road to Lillie Road. This road is intended to be 20mph and forms a zigzag through the site, will be combined with differing road surface treatments and therefore the figures may not be representative of the real figures on completion.

**10.63** 'would result in a deterioration of the performance in terms of journey times, vehicle delay and queue lengths on the east-west routes through the area. On...(the) A4 journey times increase in the AM peak by 40 seconds westbound and 60 seconds east bound in comparison to the 2009 base. In the PM Peak the overall increases in traffic volume are greater and journey times therefore increase more significantly. To site that there has to be 'a shift in behaviour towards sustainable travel choices' would appear to be undermined by revised 'green light phasing' to increase the flow of traffic on Warwick Road **10.59**; and increasing the widths of pavements **10.21**, which in turn would perhaps hamper the flow of traffic that they are trying to achieve.

It is acknowledged that the Opportunity Area is a transport-dominated site **10.2** and the proposals want to reduce the severance caused by the railway lines, **but** there is also the problem of severance for residents east of Warwick Road due to traffic, which has not been addressed in fact potentially made worse by increased traffic and increased 'green light phasing' **10.59**. This will not only make the pedestrian environment less attractive but also increase problems of pedestrian and cyclist safety, which seems to be contrary to the strategies of promoting Walking and Cycling within the Revised Draft. Much has been made of the need to promote Cycling but there is no indication that there would be Bike Lanes incorporated in the new traffic plan once out of the OA.

Furthermore, in **10.21** it states that there is generally sufficient footway width to accommodate the footfall generated by the development on the existing streets **but** this would require 'interventions' such as increased pavements widths on North End Road around West Kensington station, around Earl's Court station entrance on Warwick Road, which narrows north of the station, and West Brompton station on Old Brompton Road. There is no mention of a potential increase on Earl's Court Road, which also has narrow pavements. In Figure **10.7** the SPD shows the existing locations with sub-standard

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<sup>1</sup> (10.14) Two higher transport scenarios were considered in the first draft of the SPD:

- (1) 8,286 homes and 24,050 jobs; and (2) 10,647 homes and 31,895 jobs

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

<sup>2</sup> In the Mayor's London Plan (2011) it sets out that there should be 4,000 new homes and 7,000 new jobs in Earl's Court and West Kensington Opportunity Area.

footway widths on the street, one of which is West Brompton station where the widening of the pavement may not be an option given the Victorian bridge at that point, as it would reduce the flow of traffic.

**10.71** An east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, though not for vehicles. A vehicle route from Star Road has been assessed and does not create additional congestion on North End Road. A **vehicle access at Warwick Road has the potential to create conflict** with pedestrians using Earl's Court station and to compromise the quality of the proposed new public space.

The Traffic part of the Revised Draft needs to be examined in further detail, we need to see the traffic figures including present and proposed levels of HTV traffic, and an Origin and Destination survey to establish whether the vehicles are serving the area or just passing through. The only effective way of reducing the pressure on our roads is for the Night Time Lorry ban to be implemented and an initiative that would reduce the size, weight and length of goods vehicles that use ECOWS. This study has to cover a larger area given the impact on the Borough's main north-south priority route, and the impact on Earl's Court Road has been included in the study.

## Transport

In the Transport Section of the Revised Draft in **10.5**: 'The London Underground lines serving the Opportunity Area are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly Lines in the AM peak period. Significant increases in capacity are planned and funded for the District and Piccadilly Lines as part of the London Underground upgrades. The District Line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is **no definite date** for the upgrade of the Piccadilly Line, which would provide a capacity increase of 24%, although it is expected to be complete prior to 2031. Crossrail 1 is planned to open in 2018 (the Council are supporting the campaign for a station at Kensal), which will release capacity on the Central Line, which in turn will draw passengers from the Piccadilly Line, thereby releasing some limited capacity.' **10.34** 'There are a number of currently unfunded proposals that would, if delivered, provide transport benefits to the Opportunity Area. In particular this includes the provision of longer trains on the London Overground and Southern Services along the West London Line and the proposed **Chelsea/Hackney Line**<sup>3</sup>, which would offer relief to the Wimbledon branch of the District Line but with a station on the Kings Road will not relieve the congestion at Earl's Court, West Brompton or West Kensington. The principle of each of these proposals is supported due to the benefit that they would provide to the area.' I would venture this is wishful thinking given the length of time that it has taken to get Crossrail 1 off the ground, that Crossrail 2 will be constructed within the time frame of this development, if ever and therefore should be discounted?

Given the increased projections of approximate 30% by 2031 (based on 2009 figures) at Earl's Court<sup>4</sup>, West Brompton and West Kensington stations, and the lack of information supplied on the existing interchange passengers provided at Earl's Court and West Brompton, this appears to be an important element that is not being considered in this document. The Platforms are to capacity at present, the introduction of the tunnel will place an additional burden on the interchange between the Piccadilly and District line platforms. Therefore more emphasis has to be placed on increasing the

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<sup>3</sup> The concept for the Crossrail initiatives has been subject to a varied history. Originally conceived in 1948, resurrected in 1974, introduced to Parliament as The Central London Study of 1989 proposed as East-West Crossrail (now Crossrail), and in a 1991 a Bill was submitted to Parliament for the scheme. This bill finally received Royal Assent in 2008. The Crossrail 2 route (2008) Victoria is definite; the route south of there is not. Trains would almost certainly serve Clapham Junction; the route between Victoria and Clapham Junction could be via Battersea (to serve the new development at Battersea Power Station) or via the King's Road in Chelsea, an area of Kensington & Chelsea currently poorly served by public transport and Imperial Wharf station.

<sup>4</sup> 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

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connectivity between platforms to be able to cope with the increase and there is no indication that with the opening of the tunnel linking the site to the station will ease the interchange at Earl's Court station.

**10.37** the report states that the ticket halls at all three stations are 'not ...sufficient to cater for demand'. Therefore the suggestion to increase the ticket hall areas at Earl's Court and West Brompton stations are listed may be limited.

## Bus Services

The intention is for the bus services will need to 'reflect demand, support increased bus routes' **10.50**. Routes that connect the south of RBKC to the north are currently very limited and new services should help to bridge this gap. **10.51**.

With the anticipated volume of traffic on Warwick Road, has consideration be made of a Bus Stand within the site, to increase connectivity and reduce queuing times behind standing buses?

## Air Quality

**12.75** 'LBHF and RBKC are both designated as Air Quality Management Areas (AQMA). This designation is due to levels of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM10) in both boroughs that breach the Government's air quality objectives. Vehicles using Talgarth Road/West Cromwell Road (A4), Warwick Road, North End Road and Lillie Road are one of the main sources of NO<sub>2</sub>, PM10 and PM2.5 emissions affecting the OA. Buildings are also responsible for a significant amount of local emissions, especially NO<sub>2</sub> from gas boilers. Figures 12.6 and 12.7<sup>5</sup> show the predicted annual mean levels of PM10 and NO<sub>2</sub> in 2008 respectively. Figure 12.8 shows the number of days per year (in 2010) that PM10 exceeded the Government's objectives.'

The indications of Air Quality are based on 2008 projections. They are based on computer modelling of emissions from cars, boilers, diesel from good vehicles and the impact can be increased by the width of the roads, prevailing weather conditions, volume of moving, slow moving and statutory traffic. Earl's Court Road, being one section of ECOWS has to be included in these studies.

**12.81** The Low Emission Strategy will need to propose measures to ensure that development is air quality neutral at each phase and where appropriate, set out measures to improve air quality (see possible mitigation measures below) in accordance with the Mayor of London's Air Quality Strategy<sup>6</sup> and local air quality action plans. It may also be necessary to implement design solutions to minimise exposure to poor air quality, such as locating less sensitive uses in areas of poor air quality and/or incorporating appropriate mitigation measures.

There needs to be day-by-day monitoring, enabling instant responses by the contractors and the authorities. The RBKC Core Strategy and S106 SPD allows for S106 contributions from developers towards improved management of air quality e.g. monitoring stations within the site over the course of the project.

**12.8** shows that the Government's objective for the number of days, on which the average PM10 pollution should not exceed the daily limit of 50 micrograms per cubic metre, is **35** days. The

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<sup>5</sup> Figures 12.6 and 12.7 in the draft SPD show predicted emissions in 2008, using data from <http://data.london.gov.uk/laei-2008>. In terms of real time emissions, there are six monitoring stations in RBKC, of which one (at about 312 Earl's Court Road) is the closest to the OA. Information from the monitoring stations in RBKC is available to view and interrogate at <http://www.londonair.org.uk/LondonAir/Default.aspx>. More detailed borough-wide air quality information can be found in the RBKC Air Quality Management Progress Report 2011, available at <http://www.rbkc.gov.uk/environmentandtransport/airquality/reportsanddocuments.aspx>.

<sup>6</sup> The Government can apply similarly for a time extension from January 2010 to January 2015 to comply with legal standards for nitrogen dioxide (so called NO<sub>2</sub>). London has the highest annual mean concentrations of NO<sub>2</sub> of all 27 European capital cities with pollution over twice the legal limit and World Health Organisation guideline near our busiest streets. Incredibly, Government will not be able to comply with this legal standard in London until 2025. This raises the prospect of infraction action from the European Commission in the months leading up to the London 2012 Olympics and unlimited lump sum and daily fines in due course. (Source: Campaign for Clean Air in London)

figure shows that along the Warwick and Cromwell Roads<sup>7</sup>, the number of days exceeding the limit was between **35 and 80** days, and as high as **105** at the main junction or **162 days**.<sup>8</sup>

In the first 5-10 years of the development there is likely to be an increase of PM pollution due to construction and an increased in NO<sub>2</sub> levels due to works traffic. Therefore it is essential that contractor data on Air Quality monitoring are available to the Councils at all times.

## Noise and Vibration

**12.84** 'The main sources of noise and vibration in the OA are from road traffic, London Underground trains, West London Line trains (including freight trains) and aircraft on the Heathrow flight paths. The use of the TfL Lillie Road Depot for emergency track repairs and events at the Exhibition Centres also causes noise and vibration although these two sources of noise will be discontinued with redevelopment of the OA. Noise and Vibration also affect the adjacent properties in Philbeach Gardens who already experience high levels of vibration from the Olympia bound tube. It is anticipated that there will be some vibration during the course of the demolition and construction phases on the raft over the railways lines' and consideration of the pre-existing issue of potential damage to Kensington Mansions, Warwick and Trebovir Roads, Nevern Mansions, Warwick Road and Nevern Square, and Wetherby Mansions, Earl's Court Square through vibration from the Exhibition Centre.

## Demolition, Excavation and Construction Impacts

This is not only a complex site, but there are also residents who will have to endure night time working for prolonged periods of time for the course of 10 years. It is essential that as much work is completed off-site, and that measures which might include double glazing or other minimizing devices are undertaken for the protection of residents in Philbeach Gardens and Eardley Crescent (Phases 2, 4 and 4b).

Also, it is essential is that within the Planning Application that funding is provided (S106 Agreement) by the developer for a dedicated Environmental Health Noise and Nuisance team to support residents and liaise with the developer to deal with issues during the construction period 24/7.

Given the pre-existing history of vibration issues in Nevern, Kensington and Wetherby Mansions from rhythmic motion from the Earl's Court Exhibition Centre, there needs to be a precautionary survey of these properties to ensure that there is a baseline for determining any structural changes in these buildings.

## Flood Risk and Sustainable Water Management

**12.33** 'Thames Water is preparing a bid to Ofwat for funding for the Counter's Creek Sewer Alleviation Scheme, which will increase the capacity of the Counter's Creek sewer. Subject to securing funding from Ofwat and any necessary planning permissions and consents, construction could commence in 2014 with completion likely in 2018. However, the scheme is not yet confirmed'. **12.35** 'As the majority of the OA is located with Flood Zone 3 and the site is larger than 1ha a site specific FRA is required'.

Are there projections of probable outcomes and impacts on flooding, and will the fact that ground that was previously un-built on, therefore providing drain away, will be built on, increase the potential area for flooding? What is the position and attribution of costs for any works undertaken on the site, and what safeguards are in place to protect, and potentially improve, the delivery of water, water pressure and drain away in the surrounding areas? What are the probabilities that Ofwat will provide funding? Has the existing flooding caused by Counter's Creek been considered in this analysis? There is also the existing issue of low water pressure, surface flooding through poor street drainage.

These essential studies are incomplete and need to demonstrate the impact of Traffic, Transport and Air

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<sup>7</sup> Warwick Road/Cromwell Road Junction: 107 micrograms NO<sub>2</sub> (averaged out per year); Earl's Court Road 105 micrograms NO<sub>2</sub> (averaged out per year)

<sup>8</sup> These were projected figures.

Quality on the surrounding areas, and not exclusively to the Opportunity Area, as their impact will far wider area than dealt with in these sections. The Opportunity Area is not in 'isolation' to the rest of Earl's Court, Fulham Broadway and North End wards and any studies need to reflect this.

If you cannot make any of the Consultation meetings scheduled on **Tuesday 29 November** on Planning and **Wednesday 30 November** on Transport, or the Workshops to be announced at a latter date, and wish to comment please email: Alison Flight, RBKC Strategic Developments Team Leader for this project at: <mailto:Alison.Flight@rbkc.gov.uk>