

RBKC Housing Statement (Addendum)
Quod
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Earls Court Development RBKC Housing Statement Addendum

Contents

Vision Placeholder	3
Introduction	5
1.0 Application Overview Amendments	6
2.0 Policy	10
3.0 RBKC Housing Proposal Amendments	11
4.0 Conclusion	12

Vision Placeholder

Introduction

This Housing Statement Addendum has been prepared by Quod in response to feedback regarding Affordable Housing and wider design matters received from the Royal Borough of Kensington and Chelsea ("RBKC").

It is submitted to inform the consideration of Two Hybrid Planning Applications, one submitted to the London Borough of Hammersmith and Fulham ('LBHF') (Reference: 2024/01942/COMB) and one submitted to the Royal Borough of Kensington and Chelsea ('RBKC') (Reference: PP/24/05187) in July 2024 in relation to the redevelopment of the land bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road, the West London Railway Line ('WLL'), and 1 Cluny Mews in RBKC (the 'RBKC Site') and North End Road, Beaumont Avenue, West Cromwell Road, the WLL, land comprising the Empress State Building ('ESB'), Aisgill Avenue, the former Gibbs Green School properties fronting Gibbs Green Close, and properties fronting Dieppe Close (the 'LBHF Site') which straddle the boundary between the two boroughs (together forming 'the Site'). The Proposed Development will form the new Earls Court Development. The Hybrid Planning Applications are submitted on behalf of Earls Court Partnership Limited ('ECPL'), ("The Applicant").

This Housing Statement Addendum is supplementary to the information submitted in the Housing Statement issued in July 2024. The Addendum confirms updates to the housing proposals reflecting wider scheme design changes and feedback on housing from LBHF.

1.0 Application Overview Amendments

- 1.1 Table 3-1 in the Housing Statement (July 2024) summarised the overall number of units proposed across housing types for the development. The main amendment to the proposals within the Royal Borough of Kensington and Chelsea (RBKC) boundary relates to the number of rooms proposed for Hotel Use. In the Housing Statement, the RBKC Outline Component proposed 150 rooms; however, as a result of an uplift in floorspace, the maximum number of hotel rooms has increased to 200.
- 1.2 Further amendments to Table 3-1 following the July 2024 submission relate to proposals within the London Borough of Hammersmith and Fulham (LBHF) boundary as set out in the LBHF Housing Statement addendum.
- 1.3 As a result of these amendments, Table 3-1 in the Housing Statement has been superseded by Table 1-1, overleaf.

Table 1-1- Indicative RBKC and LBHF Hybrid Application Residential Units and Hotel, Co-Living, Older Persons Housing and PBSA Rooms

Land Use	RBKC Outline Component	RBKC Detailed Component	RBKC Total	LBHF Outline Component	LBHF Detailed Component	LBHF Total	Overall Total
Residential Units (Class C3)	1,090	310	1,400	2,044	452	2,500	3,900
Hotel Rooms (Class C1)	200	0	200	250	0	250	450
Older Persons Housing Units (Class C2)	150	0	150	150	0	150	300
Co-Living Units (Sui Generis)	40	0	40	1,000	0	1,000*	1,000
PBSA Bedrooms (Sui Generis)	30	0	30	804**	696	1,470 - 1,500**	1,500

*Maximum 1,000 Co-Living bedrooms under LBHF Hybrid Application only to be reached in the event that no Co-Living bedrooms come forward in Development Zone V2 under RBKC Hybrid Application

**Maximum 1,500 PBSA bedrooms under LBHF Hybrid Application only to be reached in the event that no PBSA bedrooms come forward in Development Zone V2 under RBKC Hybrid Application.

- 1.4 As a result of amendments to the maximum floorspace since the original submission, Tables 1-2 and 3-2 in the Housing Statement (July 2024) have been superseded by Table 1-2 below. The maximum Gross External Area (GEA) for Hotel Use in the original Housing Statement was 12,000 sqm; this has now been increased to 16,000 sqm.
- 1.5 The maximum permitted areas for Culture and Ancillary Use have also been updated since July 2024. The area for Culture Use has increased from 3,000 sqm to 7,000 sqm, while the maximum permitted area for Ancillary Use has decreased from 30,000 sqm to 20,000 sqm.
- 1.6 As a result of these changes, the overall maximum development capacity has increased from 245,002 sqm to 246,058 sqm.

Table 1-2- Detailed and Outline Area Floorspace for the RBKC Proposals		
Use	Detailed Area Floorspace GEA (sqm)	Maximum Permitted Area Floorspace GEA (sqm)
Residential	42,246	170,000
PBSA	0	2,000
Co-Living	0	2,000
Hotel	0	16,000
Office / Research and Development	0	95,000
Education	0	20,000
Health / Older Persons Housing	0	35,000
Retail / F + B / Flexible Commercial	1,451	11,000
Leisure	0	4,000
Culture	0	7,000
Storage and Distribution	0	6,000
Community / Social Infrastructure	361	2,000
Ancillary (Station Interface / Parking / General BoH)		20,000
Maximum Development Capacity	42,058	246,058

Quantum of Homes Proposed

- 1.7 The July 2024 Housing Statement set out the proposed unit type mix in Table 3-3, providing percentage ranges for the types of homes to be delivered. Since then, the

applicant has progressed the scheme design and confirmed the quantum of homes proposed within the Detailed Component of the application, as set out in Table 1-3 below.

Table 1-3- Quantum of Homes in the RBKC Detailed Application	
Unit Type	Homes
Studio	11
1 bed	104
2 bed	144
3 bed	51
4 bed	0
Total	310

2.0 Policy

- 2.1 Since the July 2024 submission, the GLA has published guidance in order to support delivery of affordable housing.

Accelerating Housing Delivery Planning & Housing Practice Note in December 2024 ('GLA Practice Note')

- 2.2 The document aims to bring forward additional measures to support housing delivery under the Mayor's planning and housing powers. This practice note focuses on short-term delivery and forms part of wider approaches established through the London Plan and the Mayor's Housing Strategy.
- 2.3 The GLA Practice Note focuses on increasing the provision of affordable homes and wider housing delivery, including social rented housing for households in greatest housing need and intermediate housing for key workers and middle income earners. It includes time-limited approaches that will be kept under review and may be withdrawn as market conditions improve. It sets out measures to support councils and registered providers of social housing (RPs) to deliver more affordable homes and to attract more institutional investment to the sector.
- 2.4 This GLA Practice Note is a material consideration for the purposes of determining planning applications. In recognition of the challenges currently facing housing delivery in London in the short term, Local Planning Authorities (LPAs) and applicants are strongly encouraged to implement the approaches in this practice note when bringing forward guidance, submitting and assessing planning applications and supporting the delivery of the pipeline of consented schemes.
- 2.5 The London Plan identifies the priority that should be given to low-cost rent housing, including social rent. In view of the particular need for social rented homes to provide for households with the lowest incomes and reduce need for temporary accommodation for homeless households, the Mayor wishes to promote additional measures that enhance the delivery of social rent. This is consistent with the objectives of the government as set out in national policy and ministerial statements.
- 2.6 In view of the significant and increasing need for social rent, the Mayor will consider allowing schemes that provide affordable housing as social rent only (or with a majority of social rent) at the equivalent level to a policy compliant threshold to be delivered without requiring full viability assessments or mid-term or late stage reviews, where the social rent provision is the equivalent to the relevant affordable housing threshold level at the local plan tenure split.

3.0 RBKC Housing Proposal Amendments

Proposals Under July 2024 Submission

- 3.1 The July 2024 submission included 35% affordable homes (measured by habitable room) in the proposals. The affordable housing mix comprised of social rent, intermediate rent and intermediate home ownership tenures, meeting or exceeding the minimum proportion of each tenure required under London Plan policy H6.

July 2025 Proposals

- 3.2 Since submission of the Hybrid Planning Applications the Applicant has continued to engage with Registered Providers (RPs) with a view to identifying potential partners to own and manage the affordable homes. RPs have responded positively to the scale and quality of the proposals, though noted that the sector is emerging from a period of uncertainty and financial challenges. Whilst government announcements on a 10 year settlement for social rent setting and the broad outline of a longer term funding programme are of assistance, concerns remain, particularly with regard to intermediate housing which is perceived to be of a higher risk profile.
- 3.3 The GLA has also recognised the challenges within the RP sector, releasing the Accelerating Housing Delivery Planning & Housing Practice Note in December 2024 ("the GLA Practice Note"). The GLA Practice Note is a material consideration for the purpose of determining planning applications. The GLA Practice Note acknowledges the challenges in the sale of affordable homes to RPs, particularly of intermediate tenures. In response to this the GLA identifies a new Fast Track route allowing schemes which provide affordable housing as entirely social rent to achieve Fast Track status with a reduced overall proportion of affordable housing. The reduced proportion is to be established by a formula which is appended to the GLA Practice Note and is intended to ensure that the fully social rent position is financially equivalent to the policy mix of social rent and intermediate tenures.
- 3.4 Given the scale and duration of the Earls Court proposals, the GLA social rent equivalence approach set out in the GLA Practice Note provides a potentially helpful route to ensure deliverability in challenging RP market conditions, particularly in respect of intermediate homes. It is therefore proposed that the permissions granted pursuant to the Hybrid Planning Applications secure the option to deliver either 35% affordable homes in a social rent / intermediate mix or the equivalent, where the affordable homes are made up of entirely as social rent. The equivalency option will only be pursued for Phase 1 of the Hybrid Application. For the avoidance of doubt, (and as detailed by the GLA Practice Note), either option would maintain the Fast Track status of the permission, with no viability reviews required .

4.0 Conclusion

Summary of Proposals

- 4.1 The Earls Court Development Company (ECDC) has worked closely with the Royal Borough of Kensington and Chelsea (RBKC) along with local stakeholders to optimise the proposals for housing. This Housing Statement Addendum sets out the approach to affordable homes, confirming that the benefits set out within the July 2024 Housing Statement remain with very minor changes to the number of homes reflecting design development in conjunction with RBKC.
- 4.2 The Proposed Development continues to represent a substantial proportion (c. two years of delivery) of all housing delivery targeted within the RBKC Local Plan and will provide up to 1,400 homes (C3 use) for local households, whilst also relieving pressure on the housing market through meeting specialist needs such as older person housing.
- 4.3 Affordable housing also continues to be included at a GLA Fast Track compliant level, either 35% in a mix of intermediate and social rent tenures or the equivalent, where the affordable homes are delivered entirely as social rent if approach set out in the GLA Practice Note is adopted. The equivalency option will only be pursued for Phase 1 of the Hybrid Application. The flexibility provided by this approach maximises deliverability in changing Registered Provider market conditions whilst also giving the opportunity to increase the total number of social rent homes delivered.

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