

# Planning Statement Addendum

ECDC Planning  
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# 1. Introduction and Executive Summary

- 1.1 This Planning Statement Addendum has been prepared by ECDC on behalf of Earls Court Partnership Limited ("ECPL") ("the Applicant") to supplement the previously submitted Planning Statement, dated July 2024.

## Background to this Planning Statement Addendum

- 1.2 Since the submission of the Hybrid Planning Applications in July 2024, consultation feedback has been received from a wide range of sources, including RBKC and LBHF in their capacity as Local Planning Authorities ("LPAs"), other statutory and non-statutory consultees, stakeholder groups and members of the public.
- 1.3 The Proposed Development as submitted in July 2024 represented a carefully considered composition which took account of significant stakeholder input over a three year pre-application process. The Hybrid Planning Applications have been positively received overall, with support for the vision and principle of the development, its landscape-led approach and the significant number of homes and jobs it can deliver being a consistent theme, while concerns have been raised in relation to the scale of the Proposed Development and perception of its environmental effects.
- 1.4 The Applicant has worked with ECDC and the wider project team, which has undertaken extensive post-submission engagement with the LPAs, consultees and stakeholders, to make a series of updates and changes to the Proposed Development to address this consultation feedback and take account of updates to planning policy and guidance published since the submission of the Hybrid Planning Applications. The updates and changes made are minor in the context of the Proposed Development and many relate to points of clarification or adjustments, which reflects the robust structure of the Proposed Development as it was originally proposed.
- 1.5 The amendments are set out and assessed where relevant in the updated application drawings and documents that comprise the supplementary submission that this Planning Statement Addendum forms a part of. For ease of reference, the proposed amendments can be broadly summarised as follows:
- Updates to Parameter Plans to reduce the maximum parameter envelope of Development Zone F in RBKC by 3.5m and refine the maximum parameter envelope of Development Zone X in LBHF, along with other incidental modifications to details on plans in relation to, for example, access points, annotations regarding ground floor active

frontages and corrections to provide clarity or ensure alignment with updates to the Development Specification and Design Code.

- Minor design changes to Development Plots within the RBKC Detailed Component (Plots EC05 and EC06) and LBHF Detailed Component (Plots WB03, WB04 and WB05), principally to address updates to Fire Safety Regulations.
- Inclusion of additional and updated codes within the Design Code to address detailed consultation feedback and ensure alignment with updated Parameter Plans and Development Specification.
- LBHF minimum residential unit number increased from 1,600 to 2,000 (proposed to be secured by an appropriately worded planning condition) and maximum office / research and development floorspace in LBHF reduced by 20,000 sqm (GEA).
- Development Specification updates to clarify details regarding land use flexibility and reflect the above amendments.

1.6 The amended development proposal for the Hybrid Planning Applications that includes the above changes is referred hereafter as the “Updated Proposed Development”.

1.7 The majority of the information submitted to supplement the July 2024 application submission is in the form of Addendums to previously submitted technical documents and drawings submitted for information, such is the nature of the proposed changes. For clarity and completeness though, full replacement versions of the Control Documents (i.e. Parameter Plans, Development Specification and Design Code) which are for approval have been submitted to replace the previous versions. A full list of replacement drawings and documents and supplementary information has been submitted alongside this Planning Statement Addendum.

## Purpose, Structure and Content of this Planning Statement Addendum

1.8 The purpose of this Planning Statement Addendum is to assess the Updated Proposed Development in the context of the latest planning policy framework at the time of writing, identifying where there are changes between the Proposed Development and Updated Proposed Development and where relevant policy or guidance updates have taken place to clarify whether there is any change to the assessment undertaken in the July 2024 Planning Statement. It should be read and considered in conjunction with the suite of updated planning application drawings and documents that have been submitted, alongside the originally submitted application drawing documents (where they have not been superseded), to inform the further consideration and determination of the Hybrid Planning Applications.

1.9 The remainder of this Addendum is structured to follow the chapter titles and numbering within the submitted July 2024 Planning Statement to enable cross referencing with the content of the previously submitted version but only to identify where matters have been updated.

1.10 It comprises the following:

- Chapter 2: provides an update on the application site (the “Site”)
- Chapter 3: updates the planning history relevant to the Site
- Chapter 4: summarises the engagement process that has taken place since submission of the Hybrid Planning Applications
- Chapter 5: sets out the updates and changes that have been made to form the Updated Proposed Development
- Chapter 6: identifies changes to the planning policy framework relevant to the Hybrid Planning Applications
- Chapter 7: considers the updates and changes made to the Updated Proposed Development in the context of relevant planning policy and guidance considerations
- Chapter 8: provides an update on S106 Agreement Heads of Terms
- Chapter 9: provides an update on the statement of public benefits associated with the Updated Proposed Development
- Chapter 10: provides updated conclusions following assessment of the Updated Proposed Development

1.11 Where there has been no change to a sub-section or part of the Chapter 7 assessment in the previously submitted July 2024 Planning Statement, for instance in relation to planning policy that remains unchanged or an assessment topic that is unchanged in the Updated Proposed Development, it is either:

- Not included in this Addendum (in which case the corresponding part or sub-section of the July 2024 Planning Statement remains applicable); or
- No change from the Proposed Development is noted ‘save for’ a particular point or matter.

### **Findings of this Planning Statement Addendum**

1.12 The Updated Proposed Development does not materially alter the original assessment or conclusions of the July 2024 Planning Statement (see Chapters 7 and 10 below). While minor in nature, the proposed changes further enhance the acceptability of the Hybrid Planning Applications, particularly when considered together with the most recent updates to the NPPF and its strengthened presumption in favour of sustainable development and the wide-ranging and significant benefits that will be delivered. As a result, the conclusion of this Planning Statement Addendum remains that planning permission should be granted for the Hybrid Planning Applications without delay.



## 2. Site and Surrounding Area

### The Earls Court Development Site

2.1 There are no changes to this Chapter of the Planning Statement, aside from a slight amendment to the LBHF Hybrid Planning Application site boundary to the north of the Empress State Building to reflect the ECPL and Mayor's Office of Policing and Crime ("MOPAC") ownership boundaries. The two Hybrid Planning Application boundaries are shown on the amended '001 – Site Location Plan' Rev P02 as shown in Figure 1a below.

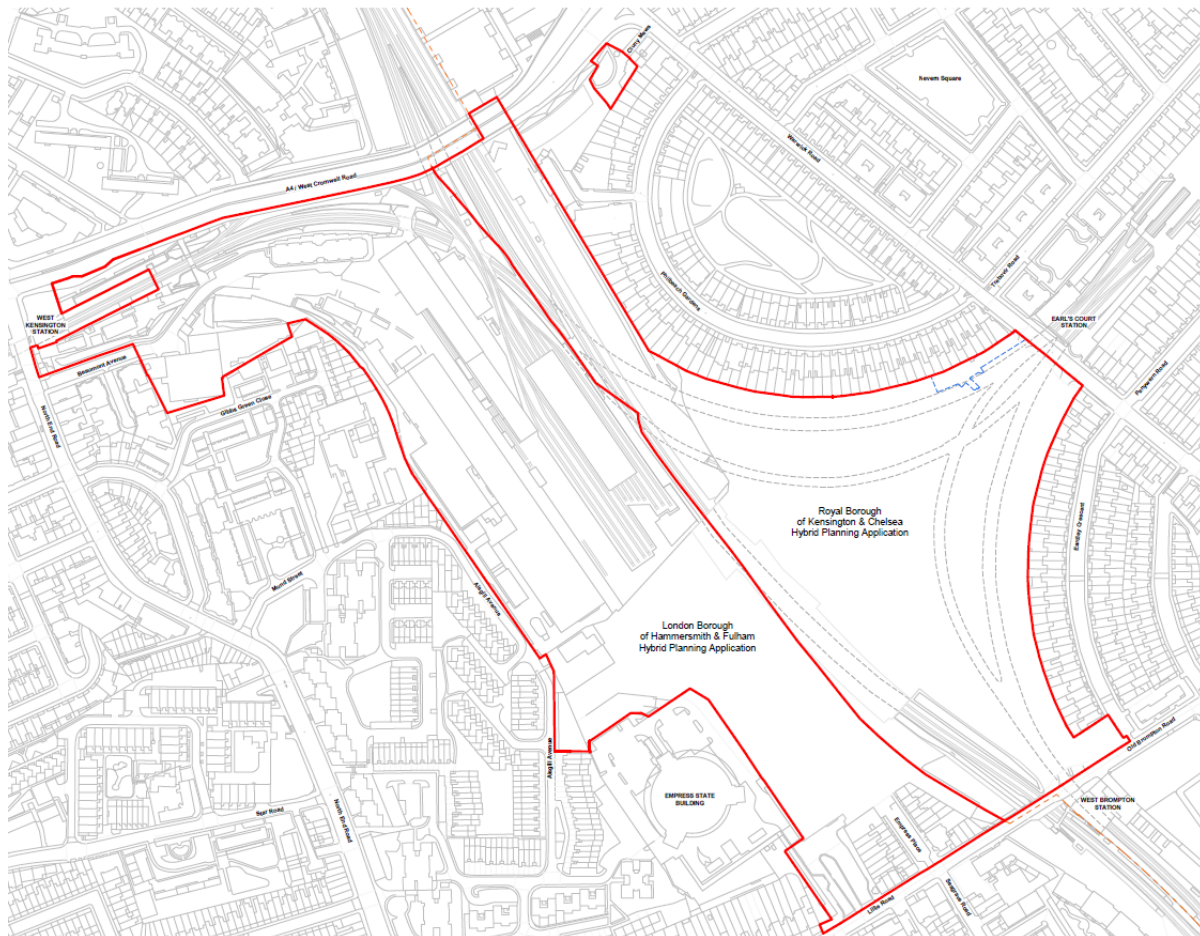


Figure 1a: PP001 Site Location Plan Rev P02

## 3. Planning History

- 3.1 The planning history for the Site remains as previously submitted, save for the following:
- 3.2 Within the RBKC Site (ref. July 2024 Planning Statement para. 3.3), planning permission (ref. PP/21/00272) for the redevelopment of 344-350 Old Brompton Road ("OBR") has now lapsed.
- 3.3 Several temporary planning permissions have been granted for meanwhile uses to occupy parts of the LBHF Site. These are summarised below:
- 'Live Entertainment' Space (ref. 2022/02045/FUL, 2024/01054/NMAT and 2024/02746/FUL): Installation of a temporary building which hosted the BBC Earth Experience and was visited by over 375,000 people in 10 months. Under an NMA and full planning application, this space has been transformed into a 'live entertainment' space to host an immersive/interactive production until 2027.
  - Padel Courts (ref.2023/02631/FUL and 2024/02875/VAR): ECDC launched an outdoor Padel court in collaboration with Padel Social Club. In spring 2024, the Padel Social Club expanded to a further four courts, a club house and bar, and wellness facilities.
  - Stone Demonstrator (ref: 2025/00024/FUL): Use of part of the former 'Earls Court Exhibition Centre 2' site, for a Stone Demonstrator with the purpose of educating construction industry specialists and the general public about using stone in construction works.
  - Temporary permission (ref: 2025/00161/FUL) for flexible community, leisure cultural and sporting uses, including a flexible pop-up food and beverage area and outdoor seating.
- 3.4 Immediately west of the Site, on land currently occupied on a temporary basis by Avonmore Primary School (known as the 'Mund Street Application'), a planning application has been submitted by LBHF to deliver 107 dwellings (Ref: 2025/02153/FR3). Construction is anticipated to commence in 2027 once Avonmore Primary School has re-located to Gibbs Green. The Mund Street scheme falls below the ES cumulative scheme criteria, but due to the proximity of this application proposal to the Site and the potential for overlapping construction programmes, it has been considered within the inter-project cumulative assessments of each ES technical chapter to assess potential impacts on the Proposed Development.
- 3.5 Further to the permissions noted above, an appended list of planning permissions of relevance to the Site is provided at Appendix 1.

## 4. Post-Submission Engagement

- 4.1 Since the registration of the Hybrid Applications in September 2024, ECDC, on behalf of the Applicant, has led post-submission engagement with members of the public, stakeholder groups, statutory bodies, design review panels and statutory consultees including the GLA, TfL, RBKC and LBHF officers and borough politicians.
- 4.2 This section provides a summary of the post-submission consultation process undertaken and where relevant, responses to consultation feedback are included in Chapter 7 below. Further details regarding engagement with local stakeholder groups and members of the public are provided in the submitted Statement of Community Involvement ("SCI") Addendum.
- 4.3 These meetings and workshops have been undertaken collaboratively to progress the design and composition of the Proposed Development since September 2024.

### EIA Reviewer Engagement

- 4.4 An Environmental Statement was submitted in support of the Hybrid Planning Applications and in compliance with RBKC and LBHF Scoping Opinions. The submitted Environmental Statement has been independently reviewed by Waterman, with Watermans Initial Review Report (IRR) received from LBHF on 27 November 2024 and from RBKC on 17 December 2024. Case Officer comments against the IRR were received from RBKC on 4 February 2025, and LBHF on 29 April 2025.
- 4.5 Since receipt of these comments, ECDC and Ramboll have undertaken a number of consultation meetings with Waterman, RBKC and LBHF officers. Ramboll's formal ES review responses for the Hybrid Planning Applications were submitted to Waterman on 1 July 2025. This process has informed the preparation of the Environmental Statement ("ES") Addendum that is submitted alongside this Planning Statement Addendum to address feedback received and an assessment of the Updated Proposed Development.

### Borough, GLA and TfL Officer Engagement

- 4.6 In addition to the above, post-submission engagement with RBKC, LBHF, GLA and TfL officers has been ongoing since Autumn 2024.
- 4.7 RBKC officer and specialist consultant feedback has been received between October 2024 and August 2025 which provides overall support for the principle of the proposed land use mix and design (subject to detailed comments which are covered in Chapter 7), with detailed feedback generally requesting further information and clarification to support the Hybrid Planning Application on the following topics:
- Planning (development management) general feedback in relation to multiple topics, including land use
  - Planning (policy), general feedback, including regarding affordable housing and affordable workspace



- Housing
- Viability
- Energy and sustainability
- Fire Safety
- Daylight, sunlight and overshadowing
- Economic development (including in relation to affordable workspace)
- Education
- Health
- Design
- Ecology
- Transport
- Heritage
- Flood risk, drainage and water management
- Air quality
- Noise
- Ground conditions
- Waste
- Security

4.8 Written feedback has been provided by LBHF officers and specialist consultants between November 2024 and August 2025, which provides overall support for the principle of the proposed land use mix and design (subject to detailed comments which are covered in Chapter 7), with detailed feedback generally requesting further information and clarification to support the Hybrid Planning Application on the following topics:

- Land use (regarding flexibility, minimum residential unit number, office floorspace quantum and feedback in relation to retail, commercial and culture strategies)
- Housing
- Viability
- Daylight, sunlight and overshadowing
- Energy and sustainability
- Flood risk and drainage
- Economic inclusion
- Design
- Transport
- Air quality
- Noise
- Ground conditions
- Waste
- Ecology

4.9 A GLA Stage 1 consultation response for the RBKC and LBHF Hybrid Planning Applications was received on 11 November 2024, and Technical Memos relating to Energy, Circular Economy, Whole Lifecycle Carbon and Air Quality were received on 13 November 2024. The response expresses strong support for the principle of the Proposed Development, proposed land use mix (on the basis a minimum number of residential units is secured) and flexibility proposed for the Outline Components. More detailed comments, which generally seek further information or clarification have been provided in relation to the following topics in addition to land use matters:

- Land Use
- Housing

- Design
- Heritage
- Transport (including initial TfL feedback)
- Energy and Sustainability

4.10 Since receipt of the Stage 1 feedback, subsequent points of clarification have been requested relating to the below topics:

- Detailed Component design
- Flood risk and drainage
- Energy, whole lifecycle carbon and circular economy

4.11 Separate pre-application feedback and engagement has taken place between TfL, ECDC and WSP including in relation to transport-specific matters regarding access, routes and the movement strategy, cycle routes, the modelling process, highway and station improvements, parking improvements and the access interface with land to the west of the Site.

4.12 In addition to the above written feedback, ECDC and the Applicant's project team have attended a total of over 100 joint and individual post-submission meetings and technical workshops with RBKC, LBHF, GLA and TfL officers. Separate meetings have generally taken place on a two-three weekly basis with RBKC and LBHF officers to discuss application progress, with joint borough meetings held to discuss technical feedback that relate to both Hybrid Planning Applications when necessary.

4.13 The meetings have covered a wide range of planning, design and technical topics. Joint meetings between RBKC, LBHF and GLA officers have taken place to discuss strategic technical matters such as energy and sustainability, with transport largely covered at joint RBKC, LBHF, GLA and TfL transport meetings to focus on specific matters related to modelling and transport-related strategies. Design and transport-focussed workshops have been held with officers since the receipt of RBKC and LBHF Case Officer Feedback to discuss more detailed matters.

4.14 While not exhaustive, Table 3a below provides a summary of the key topics that have been discussed (often on more than one occasion) with officers.

Table 3a: Summary of Post-Submission Meeting Topics		
Design Matters	Technical Matters	Transport Matters
<ul style="list-style-type: none"> <li>• Landscape Proposals – Ecology, Play Space, Public Realm and the Bioline</li> <li>• Development of the Illustrative Masterplan</li> <li>• Site optimisation, massing, height and density, including Townscape and Heritage considerations</li> </ul>	<ul style="list-style-type: none"> <li>• Viability</li> <li>• EIA discussions with Waterman</li> <li>• Land Use Mix</li> <li>• Commercial Strategy</li> <li>• Cultural Strategy</li> <li>• Sustainability Strategy, Energy Strategy, Whole Life Carbon, Circular Economy</li> <li>• Fire Strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Access, routes and movement strategy</li> <li>• Cycle routes</li> <li>• Modelling process</li> <li>• Highway improvements</li> <li>• Station Improvements</li> <li>• Parking Improvements</li> <li>• The Estates Construction</li> </ul>

<ul style="list-style-type: none"> <li>• Daylight, Sunlight and Overshadowing</li> <li>• Design Codes and Parameter Plans</li> <li>• Detailed Component proposals reviews</li> <li>• Inclusive Design, Safety and Accessibility</li> </ul>	<ul style="list-style-type: none"> <li>• Development Specification amendments</li> <li>• Air Quality</li> <li>• Arboriculture</li> <li>• S106 Heads of Terms</li> </ul>	
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## Statutory Consultee Engagement

4.15 Consultation feedback has been received from the following consultees:

- Sport England
- Active Travel England
- HSE Planning Gateway One
- Environment Agency
- Metropolitan Police
- Counter Terror Advisor
- National Air Traffic Services
- London Heliport
- Heathrow Safeguarding
- UKPN
- Thames Water
- The Royal Parks
- The Garden Trust
- Historic England
- Greater London Archaeology Advice Service
- London Underground Zones of Interest
- Transport for London
- Network Rail
- The Theatres Trust
- Twentieth Century Society
- NHS London Healthy Urban Development
- National Gas Transmission

4.16 Relevant references to the above statutory consultee feedback has been included within Chapter 7 of this Addendum.

## Review Panels

### *RBKC Qualitative Design Review Panel (Fire Safety)*

4.17 Information regarding the proposed Fire Strategy for the RBKC Hybrid Planning Application was submitted to a RBKC Qualitative Design Review Panel (“QDRP”) on 6 May 2025. The Applicant’s project team presented the updated Fire Strategy proposals in a QDRP meeting on 18 June 2025. The QDRP report was received from RBKC on 8 August 2025. This process has informed updated Fire Strategy information documents and discussions are on-going with RBKC Building Control officers .

## Community Engagement

- 4.18 ECDC, on behalf of the Applicant, has continued to engage with the local communities surrounding the Earls Court Site on the vision and plans of the Hybrid Planning Applications post submission in July 2024. The purpose of this was to continue to raise awareness of the Proposed Development, answer questions that arose, and to engage with the LPA-led application consultation process.
- 4.19 The details of post-submission engagement are set out within the submitted SCI Addendum, but are summarised below:
- August 2024 to June 2025: ECDC hosted or had presence at a range of public events, information sessions, resident meetings and pop-ups during the consideration period of the Hybrid Planning Applications.
  - September 2024 to December 2024: The information on display at Conversation Corner was updated with the content of the Hybrid Planning Applications and opened to the public on multiple days throughout the formal LPAs consultation period. Local residents and groups were notified and invited to attend to view the proposals. Members of the ECDC team were available to answer questions in person throughout the public drop-in sessions.
  - October to November 2024: Five meetings on 'Understanding the Detail' were held to support residents immediately neighbouring the Site relating to the Hybrid Planning Applications, the planning process, how to submit comments to the LPAs, as well as the process for technical assessments.
  - Autumn 2024 and Spring 2025: ECDC distributed a newsletter twice to 36,000 local residential addresses with details of the Hybrid Planning Application and information on how residents could participate in the LPA-led consultation process.
  - August 2024 to June 2025: ECDC hosted or had presence at a range of public events, information sessions, resident meetings and pop-ups during the consideration of the Hybrid Planning Applications.
  - September 2024 to June 2025: Four Public Realm Inclusivity Panel ('PRIP') sessions were held exploring a range of topics. A wider stakeholder meeting involving a sub-group of PRIP members was held on the theme of inclusive safety, culminating in the subsequent launch of the Inclusivity Safety Toolkit, shaped by the PRIP and other groups and stakeholders.
  - September 2024 to June 2025: Local area doorstep engagement took place, with 3,119 (1,803 in LBHF and 1,726 in RBKC) doors being knocked on with the ECDC team speaking to c.1,000 households. The purpose was to drive awareness amongst resident of the proposals and explain how they could make representations on the submitted Hybrid Planning Applications.
  - September 2024 to present: Regular public tours of the Earls Court development Site took place, including a visit to Conversation Corner and bookable via ECDC's Eventbrite page. The opportunity was widely advertised to the projects mailing list, through ECDC's social media channels, via London Open House and by printed newsletter and postcards distributed locally. ECDC continue to run tours and operate

the 24-hour telephone answering service and email address which are directly responded to as appropriate.

- October 2024 to July 2025: ECDC continued regular engagement with local businesses, hosting events such as a 'Understanding the Detail' breakfast briefing event, masterplan exhibition and Site tour for the Kensington, Chelsea and Westminster Chamber of Commerce, Economic Development Workshop and a Local Businesses Reception at the Prince in West Brompton.
- October 2024 to present: Meetings with a range of stakeholder groups with the purpose being to ensure awareness of the Hybrid Planning Application, listen to concerns, and answer questions raised. Groups included but were not limited to; Action on Disability, The Joint Societies, The Kensington Society, The Royal Parks, The Friends of Brompton Cemetery and St Cuthbert's Church.

4.20 RBKC (12,846 addresses) and LBHF (11,100 addresses) notified residents of the Hybrid Planning Applications by post and displaying planning application notices on street furniture / lampposts in the areas surrounding the Site. Since the registration of the applications in September 2024, 468 representations have been made to RBKC and 166 to LBHF (figures correct as of 31 July 2025). A summary of key points are provided below:

- The positive impact on the community that the project will have
- Building heights and density, including some concern and some support for taller elements
- Excitement for new green, publicly accessible spaces
- Support for new homes, particularly the inclusion of new affordable homes
- Impact on the local public transport and movement network
- The effect that an increase in local population will have on services

4.21 Further details of topic-based feedback received throughout the post-submission engagement process are set out in the submitted and updated documents, including the SCI Addendum, DAS Volume 1, 2 and 3 Addendums and within Chapter 7 of this Addendum.

## Representations to Draft Policy and Guidance

4.22 ECDC has continued to engage in statutory consultation processes for several emerging policy documents as a key stakeholder with substantial land interests in the two boroughs and London with a view to promoting development at the Site. ECDC has submitted representations to the Ministry for Housing, Communities and Local Government ("MHCLG"), GLA, RBKC and LBHF in relation to the following draft documents since submission of the Planning Application in July 2024:

- Proposed reforms to the NPPF and other changes to the planning system
- New Homes Accelerator
- Brownfield Passport
- GLA Call for Sites
- Key Worker Living Rent
- GLA Towards a New London Plan
- RBKC Earls Court Road Local Area Action Plan

## 5. Updated Proposed Development

- 5.1 This Chapter provides an overview of the updates and changes that form the Updated Proposed Development. It should also be read alongside the submitted Development Specification Rev 01, which contains the principal description of development and Application User Guide, which provide further explanation of the composition and contents of the Hybrid Planning Applications.
- 5.2 The Proposed Development remains as stated within the July 2024 Planning Statement, save for the following amendments:

### Detailed Component

- Amendments to Plots EC05, EC06, WB03, WB04 and WB05 in response to updated Fire Safety Regulations (BS9991) in particular the introduction of a secondary escape stairwell and resultant amendments to core arrangements. These have resulted in amendments to all buildings within RBKC and LBHF Detailed Components (unless otherwise specified below):
  - Internal layout reconfiguration.
  - Minor increases to building footprints (Plots WB04, WB05 and EC06).
  - Minor height increase to Plot EC05 and EC06.
  - Minor fenestration amendments.
  - Additional balcony and terrace provision to EC06.
  - External communal residential amenity space layouts at Plots EC05, WB03, WB04, WB05.
  - Public realm and open space layouts at Plots EC05 and EC06.
  - Increase in total GEA floorspace due to minor building footprint increases to accommodate additional building core space.
  - Reduction in LBHF Detailed Component residential units by 6 (462 to 456)
  - Reconfiguration of cycle parking facilities.

### Outline Component

- Amendments to Parameter Plans in respect of the following:
  - Planning application boundary to reflect re-alignment of the LBHF Hybrid Planning Application boundary between Plot WB05 and Empress State Building to the south.
  - Amendments relevant to Developments of Zones A, B and C regarding: Limits of deviation (plus/minus 2-2.8m); additional depth to development Zone O below ground level; Development Zone N below ground level extension in area to the west; Development Zone F (Plot EC03) maximum building height reduction of 3.5m; Development Zone X (Plot WK02) maximum parameter envelope setback to the north and extended below ground; amendments to



Site access, in particular the removal of vehicular access from Aisgill Avenue (via Mund Street) with the exception of emergency access and addition of potential pedestrian and cycle accesses from A4 West Cromwell Road and from the Site to Cluny Mews.

- Development Specification updates in respect of the following:
  - Clarification regarding land use definitions; updates to land use mix and floor areas within Development Zones to ensure alignment with amendments to Detailed Components, addition of Hotel (Class C1) use within Development Zone K; and updates to cycle parking numbers.
- Amendments to the Design Code in respect of the following:
  - Reflect or clarify amendments to the Parameter Plans.
  - Amended and add new West Brompton Square design codes to enhance synergy between active frontages and architectural elements.
  - New West Brompton Square design codes to ensure landscaping enhances the on-site SINC ecological corridor and responds to the character of the off-site Brompton Cemetery SINC.
  - Amended design codes in respect of Plot EC10 to enhance built form articulation in response to townscape and heritage setting from key views.
  - New design code for potential Cluny Mews pedestrian and cycle connection.
  - Amended built form design codes to clarify how buildings along Cluny Mews are articulated to create a synergy with the context, including the adjacent 1 Cluny Mews development and St. Cuthbert's Church.
  - Additional design codes to enhance articulation of built form .
  - New West Kensington Square design codes to provide design principle for a potential new square outside West Kensington Station.
  - Amended and new play space design codes to clarify the approach to integrated planting and play space; to ensure play space includes accessible equipment; and to ensure planting establishes and retains high biodiversity value.
  - New design codes added in relation to building maintenance and existing trees.

Amount of Proposed Development

- 5.3      This sub-section should be read in conjunction with submitted Development Specification Rev 01, which sets out the amount of development that is proposed under the Hybrid Planning Applications for the Updated Proposed Development. A summary is provided below.
- 5.4      The RBKC and LBHF Hybrid Planning Applications seek planning permission for a combined maximum total of 712,031 sqm GEA, which comprises the following:

Table 4a: RBKC and LBHF Hybrid Application Combined Total Permitted Floorspace

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

- 5.5      Tables 5 and 6 below set out maximum proposed floor areas by land use in each Development Zone in the LBHF and RBKC Hybrid Applications. Each land use and Development Zone has been allocated a maximum area, which is noted in the far-right hand column for land uses, titled 'Maximum Area (sqm GEA)', and along the bottom row for Development Zones, titled 'Development Zone Max Cap (sqm GEA)'. Areas relevant to Detailed Component are highlighted in green with letters and figures in *italics* for ease of reference.

Table 5a: RBKC Hybrid Application Floorspace and Land Use Table

Land use		Development Zone																
Land Use	Use Class	A	B	D	E	F	G	J	K	L	M	O	Q	R	S	V	Maximum Permitted Area (sqm GEA)	
			2				2									2		
		RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC		RBKC
Residential	C3	7,000	0	3,000	20,000	43,000	0	0	34,000	40,246	19,000	0	4,000	3,000	0	2,000	170,000	
PBSA	Sui Generis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,000	2,000	
Co-living	Sui Generis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,000	2,000	
Hotel	C1	0	0	0	0	0	0	0	16,000	0	12,000	0	0	0	0	0	16,000	
Office /Research & Development	E(g)	0	23,000	2,000	16,000	41,000	0	0	0	0	12,000	0	4,000	0	3,000	0	95,000	
Education	E (f) / F1(a)	0	0	0	0	22,000	0	0	0	0	12,000	0	0	0	0	0	20,000	
Older Persons Housing	C2	0	0	0	0	20,000	0	0	34,000	0	12,000	0	0	0	0	2,000	35,000	
Retail / F+B / Flexible Commercial	E(a)/(b)/(c) / Sui Generis	1,000	4,000	1,000	5,000	6,000	200	100	2,000	1,451*	2,000	3,000	0	0	0	0	11,000	
Leisure	E(d) / Sui Generis	0	2,000	0	0	4,000	0	0	1,000	0	0	3,000	0	0	0	0	4,000	
Culture	F / Sui Generis	1,000	3,000	0	1,000	4,000	200	100	2,000	0	2,000	3,000	0	0	0	0	7,000	
Storage and Distribution	B8	0	0	0	0	0	0	0	0	0	0	3,000	0	0	3,000	0	6,000	
Community / Social Infrastructure	F / E(e)/(f)/(g)	0	0	0	0	1,500	0	100	0	361	1,000	0	0	300	0	0	1,500	
Ancillary (Logistics / Station Interface / Parking / General BoH)	various	500	2,000	500	2,000	4,000	100	25	3,000	0	2,000	4,500	500	200	300	500	20,000	
DZ max cap (sqm)		7,000	27,000	5,000	40,000	50,000	300	200	37,000	42,058	32,000	4,500	4,000	2,100	3,000	2,000	N/A	
Maximum Permitted Area (sqm GEA)																		246,058

\* Detailed Component Plots include flexible ground floor uses which may also include Culture (Class F / Sui Generis) as well as the uses referred to in this table (refer to Table 4 of the Development Specification Rev 01).

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

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

\*Detailed Component Plots include flexible ground floor uses which may also include Culture (Class F / Sui Generis) as well as the uses referred to in this table (refer to Table 4 of the Development Specification Rev 01).

Notes in relation to interpretation of land use types and use class references:

- References to '**Residential (Use Class C3)**' relate to self-contained residential units, which may include housing for older people with an element of care provision, but which falls within Use Class C3 (as distinct from Use Class C2 Older Persons Housing)
- References to '**Purpose Built Student Accommodation (Sui Generis)**' relate to floorspace and bedrooms or occupation by students in higher education, which will be provided in addition to Class C3 residential units.
- References to '**Co-Living (Sui Generis)**' relate to Co-Living floorspace and units. Co-Living as a land use is defined for the purposes of the Hybrid Applications as non-self-contained housing units that fall within the Sui Generis Use Class so are distinct from Class C3 residential units referred to above, but are not restricted to occupation by specified groups, such as students or older people.
- References to '**Older Persons Housing (Use Class C2)**' relate to Older Persons Housing floorspace and units. Older Persons Housing as a land use is defined for the purposes of this Development Specification as self-contained housing units provided with care available and for occupation by people aged, for example, 55 or over that fall within Use Class C2 so are distinct from Class C3 residential units referred to above.
- References to '**Flexible Retail / F&B / Commercial**' relate to a range of types of retail, food and beverage and commercial uses that may fall within Use Classes E(a)/(b)/(c) and/or Sui Generis, although other uses retail-related uses, such as those associated with to cultural activities, may also come forward as part of the Proposed Development. Such uses may alternatively occupy floorspace under other Land Use types such as 'Culture'.
- References to '**Culture**' relate to a range of cultural uses that may fall within Use Classes E(a)/(b)/(c), F and/or Sui Generis, although other retail-related cultural uses may also come forward as part of the Proposed Development. Such uses may alternatively occupy floorspace under other Land Use types, such as Flexible Retail / Food and Beverage / Commercial.
- References to '**Leisure**' relate to a range of leisure uses that may fall within Use Class E(d) and/or Sui Generis, although other leisure-related uses, such as those associated with retail or cultural activities, may also come forward as part of the Proposed Development. Such uses may alternatively occupy floorspace under other Land Use types, such as Flexible Retail / F&B / Commercial or Culture.

- *Additional incidental and ancillary Flexible Retail / F&B / Commercial, Culture and / or Leisure uses could occur within the proposed public realm. However, any incidental use would be small scale, and additional permanent structures would be subject to separate planning applications in future.*
  - *References to ‘Community / Social Infrastructure’ relate to uses that may fall within Use Classes E (e)/(f)/(g) and/or F), although other education-related community / social infrastructure uses may also come forward as part of the Proposed Development. Such uses may alternatively occupy floorspace under other land use types such as ‘Education’.*
  - *References to ‘Education’ relate to educational uses that may fall within Use Class F1 (a), although other community / social infrastructure-related education uses may also come forward as part of the Proposed Development. Such uses may occupy floorspace under other Land Use types such as Community / Social Infrastructure.*
  - *References to ‘Health (Use Class C2)’ relate to health-related uses such as a Hospital, as distinct from Older Persons Housing referred to above.*
  - *References to ‘Storage and Distribution (Use Class B8)’ relate to any use within Class B8, including Warehouse, Storage, Logistics and Data Centre uses.*
  - *References are made to ‘Sui Generis’ uses in relation to various land types in Tables 4-7 of the Development Specification Rev 01 (and 5-6 of this Planning Statement Addendum). Unless otherwise specified (e.g. in the case of Purpose Built Student Accommodation and Co-Living), these references could relate to any of the following: Bus Parking Facility, Theatre, Car Showroom, Nightclub, Drinking Establishment (with or without expanded food provision), Hot Food Takeaway, Live Music Performance Venue, Cinema, Concert Hall, Bingo Hall and Dance Hall uses. The precise mix and nature of these uses is not known at this stage in terms of their quantum or location in either Hybrid Application, but an allowance is included to allow the potential for them to come forward as part of applications for RMA, where they would be assessed in relation to their impacts and benefits prior to RMA approval being granted.*
  - *References to ‘Ancillary’ floorspace relates to standalone buildings or structures within the public realm, as well as interfaces with stations, plant (including substations), parking and general back of house areas that are either shared between multiple land uses or not otherwise included in floor area figures for land uses identified above. Unless otherwise specified, references to ‘Use Class F’ may include uses related to education, display of works of art, museums, libraries or reading rooms, public halls or exhibition halls and excludes places of worship and law courts.*
- 5.6 For applicable land uses, maximum caps on units of accommodation are also set out in Table 7 below. 35% affordable housing or the equivalent (calculated as a proportion of Class C3 residential habitable rooms) and affordable PBSA bedrooms (calculated as a proportion of Sui Generis PBSA bedrooms) are proposed across the Proposed Development.

Table 7a: RBKC and LBHF Hybrid Application Residential Units and Hotel, Co-Living, Older Persons Housing and PBSA Rooms							
Land Use	RBKC Outline Component (Maximum)	RBKC Detailed Component	RBKC Total (Maximum)	LBHF Outline Component (Maximum)	LBHF Detailed Component	LBHF Total (Maximum)	Overall Total (Maximum)
Residential Units (Class C3)	1,090	310	1,400	2,044	456	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	1,500**	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.

### RBKC Detailed Component

5.7 The proposed floorspace by land use (in GEA and GIA sqm) for the RBKC Detailed Component is set out in Table 8a below:

Table 8a: RBKC Detailed Component			
Land use	Use Class	Amount (sqm)	
		GEA	GIA
Residential	C3	40,246	36,358
Flexible / Retail / Food and Beverage / Commercial / Culture	E(a)/(b)/(c) / F / Sui Generis	1,451	1,352
Office / Research and Development	E(g)	0	0
Nursery	E(f)	361	326
Total		42,058	38,036

5.8 The RBKC Detailed Component includes the following proposed residential unit mix:

Table 9a: RBKC Detailed Component Mix of homes	
Home Size	Number of Homes
Studio	11
1 bed	104
2 bed	144
3 bed	51
Total	310

### *LBHF Detailed Component*

- 5.9 The proposed floorspace by land use (in GEA and GIA sqm) for the LBHF Detailed Component is set out in Table 10 below:

Table 10a: LBHF Detailed Component			
Land use	Use Class	Amount (sqm)	
		GEA	GIA
Residential	C3	55,143	49,937
Student	Sui Generis	30,635	28,042
Leisure	E(d) / Sui Generis	2,113	1,933
Flexible Retail / Food and Beverage / Commercial / Culture	E (a) / (b) / (c) / F / Sui Generis	3,235	2,918
Community / Social Infrastructure	F2/E(g)/(f)/(g)	422	380
Ancillary	Sui Generis	1,425	1,356
Total		92,973	84,566

- 5.10 The LBHF Detailed Component includes the following proposed residential unit mix:

Table 11a: LBHF Detailed Component Mix of homes	
Home Size	Number of Homes
Studio	28
1 bed	171
2 bed	169
3 bed	88
Total	456



- 5.11     There is no change to the LBHF Detailed Component Mix of PBSA proposed in Plot WB03, which remains as set out in the July 2024 Planning Statement. Commercial floorspace would continue to be provided at podium levels.
- 5.12     There have been no changes to Plot WB04 mix or quantum of homes set out in the July 2024 Planning Statement. The altered mix of homes within Table 11a reflects amendments within Plot WB05.
- 5.13     WB05 provides 178 apartments and associated amenity space, which reflects a reduction of six homes following internal layout changes made in response to feedback from Registered Providers of affordable housing and LBHF housing and design officers.
- 5.14     Together, the ground levels of WB03, 04 and 05 comprise c. 5,230 sqm GIA of flexible retail, F&B, commercial, culture and community space, as well as leisure floorspace, and c. 1,360 sqm GIA of ancillary space.

Landscaping and Public Realm

- 5.15     This section remains as set out in the July 2024 Planning Statement aside from references to information in relation to areas of proposed public realm, which have since been updated.
- 5.16     The landscaping proposal for the LBHF Detailed Component remains predominantly as shown within the July 2024 Planning Statement with only very minor amendments at podium and courtyard level to ensure compliance with BS9991.

Play space

- 5.17     This section remains the same as set out in the July 2024 Planning Statement, aside from the below amendments to amounts of Detailed Component play space.
- 5.18     The RBKC Detailed Component will provide play space as follows:

Table 13a: RBKC Detailed Component play space quantum	
Age Group	Area Proposed (sqm)
Aged 0-4	160
Aged 5-11	0
Aged 12-18	0
Total	160

5.19 The LBHF Detailed Component will be providing play space as follows:

Table 14a: LBHF Detailed Component play space quantum	
Age Group	Area Proposed (sqm)
Aged 0-4	605
Aged 5-11	0
Aged 12-18	0
<b>Total</b>	<b>605</b>

5.20 The total Detailed Component for RBKC and LBHF will be providing play space as follows:

Table 15: Total Detailed Component play space quantum	
Age Group	Area Proposed (sqm)
Aged 0-4	765
Aged 5-11	0
Aged 12-18	0
<b>Total</b>	<b>765</b>

### *Car Parking*

5.21 A Transport Statement, Transport Statement Addendum, Framework Travel Plan and Framework Travel Plan Addendum have been submitted in support of the Updated Proposed Development.

5.22 The final number of car parking spaces for the Outline Components will be determined at RMA stage when the final residential unit mix and non-residential floorspace proposed by each RMA are approved. To align with the design updates, there have been some minor updates to the maximum number of car parking spaces that the Proposed Development (including the Outline and Detailed Components) would provide based on the maximum mix of proposed land uses, which comprises the following:

### Outline Components

Table 15a: Maximum Car Parking Provision				
Type	Sub-category	RBKC	LBHF	Maximum
Residential	-	43	77	120
Non-residential	-	9	16	25
Other	Visitor	12	23	35
	Car Club	10	15	25
<b>Total</b>		<b>74</b>	<b>131</b>	<b>205</b>

### Cycle Parking

- 5.23 The final number of cycle parking spaces for the Outline Components will be determined at RMA stage when the final residential unit mix and non-residential floorspace proposed by each RMA are approved. To align with the design updates, the maximum number of cycle parking spaces that the Proposed Development (including the Outline and Detailed Components) would provide based on the maximum mix of proposed land uses has increased, and comprises the following:

Table 16a: Maximum Cycle Parking Provision				
Type	Sub-category	RBKC	LBHF	Maximum
<b>Residential</b>	Long Stay	2,547	4,544	7,091
	Short Stay	39	64	103
<b>Non-residential</b>	Long Stay	950	3,755	4,705
	Short Stay	315	515	830
<b>Total</b>	Long Stay	3,498	8,298	11,796
	Short Stay	354	578	932
	<b>All</b>	<b>3,852</b>	<b>8,877</b>	<b>12,729</b>

5.24 The following cycle parking is proposed for the RBKC Detailed Component:

Table 17a: RBKC Detailed Component Cycle Parking Provision					
Land use	Land use classification	Quantum	Metric	Cycle Parking	
				Long Stay (rounded)	Short Stay (rounded)
Residential	C3	310	Homes	558	11
Food and Beverage	E(a)/(b)/(c)	1,451	sqm GEA	15	87
Social Infrastructure	F2	361	sqm GEA		
Total				573	98

5.25 The following cycle parking is proposed for the LBHF Detailed Component:

Table 18a: LBHF Detailed Component Proposed Residential Cycle Parking Spaces			
Dwelling Type	Number of Units	Cycle Parking	
		Long-Stay	Short-Stay
1 bed 1 person (inc. PBSA)	724	550	32
1 bed 2 person	171	275	
2+ bed	257	514	
Total	1,158	1,327	32

Table 19a: LBHF Detailed Component Proposed Non-Residential Cycle Parking Spaces			
Dwelling Type	GEA (sqm)	Cycle Parking	
		Long-Stay	Short-Stay
Retail / Food and Beverage / Flexible Commercial	2,284	14	114
Leisure	2,113	4	21

<b>Community / Social Infrastructure</b>	422	2	13
<b>Total</b>		<b>20</b>	<b>148</b>

## 6. Planning Policy Framework and Overview

- 6.1. The Planning Policy Framework and Overview Chapter remains as stated within the July 2024 Planning Statement, save for the following.
- 6.2. The Development Plan for the RBKC Site comprises the following:
- London Plan (2021); and
  - RBKC New Local Plan Review (July 2024).
- 6.3. In addition to the Development Plan, regard has been had to the National Planning Policy Framework (“NPPF”) (2025) and the National Planning Practice Guidance (“NPPG”) (2024).
- 6.4. The NPPF (most recently updated in December 2024 and amended in January 2025) sets out the Government’s planning policies for England. These policies articulate the Government’s vision for sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.5. The NPPG (published in November 2016 and most recently updated in February 2024) sets out the Government’s official guidance that supports and explains the policies contained within the NPPF, and should be read in conjunction with these policies.

### Local Policy (RBKC)

#### *RBKC New Local Plan Review (2024)*

- 6.6. The RBKC New Local Plan Review (2024) (“RBKC New Local Plan (2024)”) was adopted in July 2024 shortly after the submission of the Hybrid Planning Applications. It sets out the spatial policies, development management policies and site allocations to guide and manage development in RBKC. The documents submitted in support of the Hybrid Planning Applications took account of the policies within the RBKC New Local Plan (2024) as it was written at the time of application submission. There were no material amendments made to the plan as taken into account for the July 2024 RBKC Hybrid Planning Application submission and the adopted version. Any amendments to the content of the RBKC New Local Plan (2024) following the dates of the application submission are noted in Addendums to documents previously submitted.
- 6.7. Any reference to RBKC’s Previous Local Plan (2019) is no longer applicable within the July 2024 Planning Statement.



## Supplementary Guidance

### *National Guidance*

- 6.8. The Government has published National Planning Practice Guidance (“NPPG”), which is updated periodically. Updates to NPPG since July 2024 are referred to where relevant to the Proposed Development in Chapter 7 below.

### *Regional Guidance*

- 6.9. The Mayor of London has published a suite of adopted Supplementary Planning Guidance (SPG) and London Planning Guidance (LPG) documents. Since submission of the planning application in July 2024, the following LPG has been adopted (publication date in brackets):

- Large-Scale Purpose-Built Student Accommodation LPG (2024)

- 6.10. The following GLA LPG was excluded from the 2024 Planning Statement in error:

- Characterisation and Growth Strategy LPG (2023)

- 6.11. The following GLA LPGs are no longer in effect:

- Shaping Neighbourhoods: Character and Context SPG (2014)
- Purpose-Built Student Accommodation LPG (October 2023)

- 6.12. The GLA published an Accelerating Housing Delivery Guidance Note in December 2024 which is a material consideration for the purposes of determining planning applications and is of relevance to the Hybrid Planning Applications.

### *RBKC*

- 6.13. The following Supplementary Planning Documents (“SPDs”) should have been referred to in the July 2024 Planning Statement in addition to those listed in Chapter 6 as submitted as they were taken into account in the preparation of the RBKC Hybrid Planning Application:

- Strategic Flood Risk Assessment (2022)
- Trees and Development SPD (2023)

### *LBHF*

- 6.14. Since the submission of the LBHF Hybrid Planning Application in July 2024, the following documents have been published:

- Hammersmith Town Centre SPD (August 2024)
- Carbon Offset Cost Guidance Note (April 2025)

- 6.15. Although not a Supplementary Planning Document, LBHF published their Upstream London industrial strategy in November 2024, which is a material consideration referenced within Chapter 7 of this Planning Statement Addendum.

# 7. Assessment of Proposed Development

## Introduction

- 7.1. The planning assessment for the Updated Proposed Development remains as stated within the July 2024 Planning Statement unless otherwise set out below in this chapter.
- 7.2. On this basis, policy tables and associated assessment text within Chapter 7 of this Planning Statement Addendum are only included below where they have been amended or were not covered in the July 2024 Planning Statement. Previous references to 'draft' RBKC Local Plan policies are updated in this Addendum chapter to confirm they are now adopted policies, but no further assessment is set out unless relevant to an amendment to the Proposed Development. This assessment also takes account of the most recently adopted NPPF (2025) and other planning guidance published since July 2024, which are referred to where relevant in the sub-sections below.
- 7.3. All policy and topic-specific sub-sections that have not changed since July 2024 are not included in this Addendum and remain as previously stated in the July 2024 Planning Statement. This applies to both the Early Phases and All Phases development scenarios.
- 7.4. The Sections / Sub-Sections that have been amended within this Planning Statement Addendum are highlighted in *green italic* text in the table below for ease of reference:

Section / Sub-Section Title	Page Number
<b>Principle of Development</b>	30
<b>Land Use</b> <ul style="list-style-type: none"><li><i>Housing, including Affordable Housing, Viability and Older Persons Housing</i></li><li><i>Purpose-Built Student Accommodation ("PBSA")</i></li><li>Co-living / Shared Living</li><li><i>Workspace, including Affordable Workspace</i></li><li><i>Culture</i></li><li><i>Retail and Leisure</i></li><li><i>Hotels</i></li><li><i>Social Infrastructure</i></li><li>Storage and Distribution</li><li>Sui Generis Uses</li></ul>	32
<b>Design</b> <ul style="list-style-type: none"><li><i>High Quality Design and Design-Led Approach</i></li></ul>	42

<ul style="list-style-type: none"> <li><i>Landscape and Public Realm (including Playspace and Urban Greening Factor and Biodiversity Net Gain)</i></li> <li><i>Density</i></li> <li><i>Building Heights, Scale and Massing (including Tall Building Statement)</i></li> <li><i>Residential Amenity</i></li> </ul>	
<b>Heritage and Townscape</b>	49
<b>Fire Safety</b>	50
<b>Sustainable Design</b> <ul style="list-style-type: none"> <li><i>Sustainability Strategy, including Social Value and Economic Inclusivity</i></li> <li><i>Energy Strategy</i></li> <li><i>Overheating Strategy</i></li> <li><i>Whole Lifecycle Carbon and Circular Economy</i></li> <li><i>Household and Commercial Waste</i></li> </ul>	51
<b>Transport and Accessibility</b>	55
<b>Environmental Considerations</b> <ul style="list-style-type: none"> <li><i>Demolition and Construction</i></li> <li><i>Archaeology</i></li> <li><i>Health</i></li> <li><i>Air Quality</i></li> <li><i>Noise and Vibration</i></li> <li><i>Ecology, Greening and Trees</i></li> <li><i>Ground Conditions</i></li> <li><i>Water Resources</i></li> <li><i>Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill</i></li> <li><i>Wind</i></li> <li><i>Climate</i></li> </ul>	58

## Principle of Development

### *Relevant Policy Context*

- 7.5. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	<ul style="list-style-type: none"> <li>Para. 61 recognises the need for sufficient land to come forward where it is needed, to significantly boost housing supply.</li> <li>Para. 125(c) gives substantial weight to the use of brownfield land for homes and other needs, proposals for which should be approved unless substantial harm would be caused.</li> </ul>
<b>RBKC Adopted Local Plan</b>	<ul style="list-style-type: none"> <li>Policy SA2: Earls Court Exhibition Centre</li> </ul>

## Assessment

- 7.6. The principle of the Updated Proposed Development remains supported by relevant planning policy and guidance at all levels and that support is strengthened by updates to paragraph (para.) 11 of the 2025 updated NPPF where it continues to apply the presumption in favour of sustainable development and states that for decision-taking this now means:

*“c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>1</sup>, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance<sup>2</sup> provides a strong reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination<sup>3</sup>.”*

- 7.7. Footnote 8 (copied below for ease of reference) confirms that where a Housing Delivery Test indicates that the delivery of housing within a local authority was substantially below (i.e. less than 75%) its housing requirement the previous three years, Local Plan policies will be considered to be ‘out of date’ for the purposes of NPPF para. 11.

- 7.8. The results of the Housing Delivery Test (“HDT”) were published on 12<sup>th</sup> December 2024, which confirmed that RBKC delivered 854 homes in the period 2020/21 to 2022/23. This is only 63% of the total number of homes required and means that for the RBKC Hybrid

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<sup>1</sup> [NPPF Footnote 8] This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. See also paragraph 227.

<sup>2</sup> [NPPF Footnote 7] The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

<sup>3</sup> [NPPF Footnote 9] The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12

Planning Application, the ‘titled balance’ in the presumption in favour of sustainable development is engaged and Local Plan policies are to be considered ‘out of date’. NPPF para. 11 directs that development proposals should be granted permission unless there is a strong reason for refusal in relation to the protection of designated assets or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against NPPF policies taken as a whole.

- 7.9. The wide range of public benefits associated with the Proposed Development are summarised in Section 9 of the July 2024 Planning Statement and are fundamentally unchanged. They are not therefore reprised in full here, but remain central to the planning balance in the determination of the Hybrid Planning Applications. Those benefits, when considered alongside the overall accordance of the Proposed Development in the context of the LBHF and RBKC Development Plans when read as a whole, demonstrate that the Proposed Development represents sustainable development and should be granted planning permission, in accordance with NPPF para. 11. The titled balance that results from the HDT findings in RBKC further strengthens the presumption in favour of sustainable development and support for the RBKC Hybrid Planning Application to be approved without delay.

## Land Use

### Housing, including Affordable Housing and Viability

#### *Relevant Policy Context*

- 7.10. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy / Guidance Document	Policy or Para. Reference / Title
<b>NPPF</b>	<ul style="list-style-type: none"> <li>- Para. 61 outlines the Government’s objective of significantly boosting the supply of homes, stressing the importance that a sufficient amount and variety of land can come forward where it is needed, and that the needs of specific housing requirements are addressed.</li> <li>- Para. 72 stresses that planning authorities are required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement.</li> </ul>
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy HO1: Delivery and protection of homes</li> <li>- Policy SA2(a): Earl’s Court Exhibition Centre</li> <li>- Policy HO3: Community housing</li> <li>- Policy HO4: Housing size and standards</li> <li>- Policy HO5: Specialist housing</li> <li>- Policy HO6: Other housing products</li> </ul>

<b>GLA Accelerating Housing Delivery Guidance Note</b>	- Guidance published in December 2024 focussed on increasing housing delivery and forming part of suite of housing policy and guidance established through the London Plan and the Mayor's Housing Strategy.
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### *Assessment*

- 7.11. This section should be read in conjunction with the submitted RBKC and LBHF Housing Statement Addendums and Financial Viability Assessment ("FVA") Addendums.

### *Contribution to Housing Delivery (LBHF)*

- 7.12. The number of residential units proposed for the Detailed Component has been revised from 462 to 456 to take account of change to update the Fire Strategy for buildings in Development Plots WB04 and WB05.
- 7.13. The Applicant has also agreed in principle through post-submission discussions with LBHF officers to an appropriately worded planning condition that requires a minimum of 2,000 minimum residential units to be delivered under All Phases scenario for the LBHF Hybrid Planning Application.
- 7.14. The minor change in residential unit numbers proposed for the Detailed Component will not change the overall assessment for the Early or All Phases LBHF Hybrid Planning Application proposals in relation to housing delivery, which will still be significant, and the proposed condition will provide a mechanism for the Council to ensure that a minimum number of homes will be delivered towards annual housing targets and development under the FRA and Earls Court and West Kensington Opportunity Area ("ECWKO") site allocations in LBHF.

### *Housing Mix*

- 7.15. There are no changes proposed to the housing mix within the Outline Components in RBKC or LBHF. Minor changes have been made to the proposed housing mix for the Detailed Components, which have resulted in the following updated proposed unit mix:

Table 24a: RBKC Detailed Component Unit Mix (C3 homes)						
Unit Type	EC05		EC06		Unit Total	
	Units	%	Units	%	Units	%
Studio	11	5%	0	0%	11	3%
1 Bed	75	37%	29	27%	104	35%
2 Bed	101	50%	43	40%	144	46%
3 Bed	15	8%	36	33%	51	16%
<b>Total</b>	<b>202</b>	<b>100%</b>	<b>108</b>	<b>100%</b>	<b>310</b>	<b>100%</b>



Table 25a: LBHF Detailed Component Unit Mix (C3 homes)

Unit Type	WB04		WB05		Unit Total	
	Units	%	Units	%	Units	%
Studio	28	10%	0	0%	28	6%
1 Bed	113	41%	58	32%	171	38%
2 Bed	107	38%	62	35%	169	37%
3 Bed	30	11%	58	33%	88	19%
<b>Total</b>	<b>278</b>	<b>100%</b>	<b>178</b>	<b>100%</b>	<b>456</b>	<b>100%</b>

- 7.16. The proposed housing mix changes are minor in the context of the Updated Proposed Development and does not change the assessment as set out in the July 2024 Planning Statement.

*Affordable Housing and Viability*

- 7.17. The Applicant has progressed discussions regarding affordable housing and financial viability with RBKC and LBHF officers and their specialist consultants since the submission of the Hybrid Planning Applications in July 2024. The proportion of affordable housing proposed has received general in principle support, informed by a viability review process, with the principal focus of discussion being on the tenure mix for the proposed affordable housing component and the applications being considered through the London Plan Fast Track Route ("FTR"). Alongside this, the Applicant has also continued to engage with Registered Providers ("RPs") of affordable housing with a view to identifying potential partners to own and manage the affordable homes and GLA officers in relation to the availability of grant funding.
- 7.18. The proposed 35% (by habitable room) affordable housing proportion and tenure mix (40% social rent and 60% intermediate) remains as set out in July 2024 for both Hybrid Planning Applications.
- 7.19. Financial viability information was submitted with the Hybrid Planning Applications in July 2024 in support of the Applicant's case that the Hybrid Planning Applications should be considered through the FTR. Discussions regarding final details associated with cost and value inputs are on-going, but specialist consultants for RBKC (BNP Paribas, or "BNPP") and LBHF (BPS) have reviewed the FVAs submitted in July 2024 and further information provided post-submission. They have separately concluded, in line with the findings of the July 2024 FVAs and FVA Addendums submitted alongside this Addendum, that the proposed amount of affordable housing is well in excess of the maximum reasonable that would be justified based on viability alone.
- 7.20. GLA Stage 1 feedback has confirmed that the Hybrid Planning Applications can be considered eligible for the FTR, subject to confirmation of the proposed tenure split being acceptable to the LPAs.

- 7.21. During post-submission engagement, officers have raised concerns in relation to the percentage of social rent included in the affordable housing tenure split and its relation to local planning policy to allow the Hybrid Planning Applications to proceed under the Fast Track Route. The Applicant remains of the view that the Hybrid Planning Applications should be considered through the FTR.
- 7.22. The proposed tenure mix differs from the preferred mixes set out in RBKC New Local Plan (2024) Policy H03 and LBHF Local Plan Policy H03, but there is sufficient flexibility within London Plan policy when read together with Local Plan policy that allows the Hybrid Planning Applications to be considered through the FTR. The Hybrid Planning Applications propose a tenure mix that aligns with London Plan Policy H5C(2) and H6 on the basis it can be considered consistent with, if not identical to, that stated in Local Plan policy based on a judgement that must take into account the wider benefits of the FTR compared to the Viability Tested Route and the contribution the Updated Proposed Development can make to affordable housing delivery and helping to meet identified housing need.
- 7.23. This approach has been taken and accepted by the GLA and Boroughs across London since the introduction of the FTR in 2021 on the basis that the development plan is to be read as a whole and a departure from adopted Local Plan policy tenure splits can, when considered with London Plan policy, be acceptable for development proposals to follow the FTR.
- 7.24. The clear intention of the FTR is to incentivise applicants to commit to a higher amount of affordable housing than they could otherwise reach using a viability based approach to optimise the delivery of affordable housing and help meet local need, which exists for all tenures of affordable housing in RBKC and LBHF. The outcome of the viability review process to date, which has been undertaken to provide evidence that the proposed proportion of affordable housing and tenure mix will maximise the amount of affordable housing the Updated Proposed Development can deliver, provides further support for the Applicant's proposed affordable housing tenure mix, which should be considered acceptable for the Hybrid Planning Applications to follow the FTR when considering relevant planning policy in the round.
- 7.25. Notwithstanding the above, as part of post-submission engagement, the Applicant has also sought to explore alternative tenure mix options with RBKC and LBHF officers while maintaining the overall viability of the Updated Proposed Development. Discussions are also on-going with RPs, which have provided in principle support for the scale and quality of the development proposed, but also noted current challenges within the RP sector.
- 7.26. The GLA published the Accelerating Housing Delivery Guidance Note (the "GLA Guidance Note") in December 2024, which is a material consideration for the purposes of determining planning applications and is of relevance to the Hybrid Planning Applications. It recognises challenges associated with the sale of affordable housing to RPs and particularly Intermediate tenure affordable housing. In response, the guidance identifies a new FTR, referred to below as affordable housing "equivalency". This involves proposals offering entirely social rented affordable homes (i.e. no intermediate housing) with a reduced overall proportion of affordable housing, which is established by the formula set out in the Guidance Note, to establish a financial "equivalency" that ensures that a Fast Track-equivalent level

of affordable housing is still proposed, but can deliver a greater proportion of social rented housing than if it formed part of a mix with intermediate as part of a 35% proportion of housing proposed.

- 7.27. The submitted Housing Statement Addendums explain that the equivalency formula has been tested for buildings in Phase 1 of the Updated Proposed Development in RBKC and LBHF.
- 7.28. To allow for flexibility in the composition of affordable housing tenure mix that can come forward during Phase 1 of the Updated Proposed Development, it is proposed that any planning permission granted for the Hybrid Planning Applications is accompanied by an appropriately worded Section 106 obligation that secures the option to deliver either 35% affordable homes in a social rent / intermediate mix or the equivalent where the affordable homes are entirely made up of social rent. The equivalency option will only be pursued for Phase 1 of the Updated Proposed Development. For the avoidance of doubt, (and as detailed by the GLA Practice Note), either option could maintain the Fast Track status of the permission, with no viability reviews required.

## Purpose-Built Student Accommodation (“PBSA”)

### *Relevant Policy Context*

- 7.29. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following.

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	- Para. 61 outlines the Government’s objective of significantly boosting the supply of homes, stressing the importance that a sufficient amount and variety of land can come forward where it is needed, and that the needs of specific housing requirements are addressed.
<b>London Plan</b>	- Purpose-built Student Accommodation LPG (2024) <ul style="list-style-type: none"> <li>- Para. 1.1.1 notes that the purpose of this document is to support London Plan Policy H15.</li> <li>- Para. 1.2.5 notes that PBSA is counted towards housing supply on a ratio of 2.5:1 and para 2.1 Acknowledges that housing need is met by PBSA directly through housing students and indirectly through helping to alleviate pressure on traditional rented homes.</li> <li>- Sections 2.4 – 2.6 provide design guidance for new PBSA developments.</li> <li>- Para 3.1.2 is the requirement to secure most of the PBSA through a nominations agreement.</li> </ul>
<b>RBKC New Local Plan</b>	- Policy HO6 (d and e): Other housing products

### *Assessment*

- 7.30. The Mayor of London adopted the Purpose-Built Student Accommodation London Plan Guidance (PBSA LPG) on 20 November 2024. This guidance, which has been prepared to support London Plan Policy H15, aims to inform the design and development of PBSA to better meet London's housing needs, while balancing its delivery with other housing types. It reinforces the importance of the contribution PBSA makes to addressing London's housing needs and seeks to ensure PBSA contributes positively to mixed and inclusive neighbourhoods and addresses potential issues related to student housing concentrations ensuring high quality safe and inclusive schemes which are integrated into their neighbourhood.
- 7.31. The LPG provides broad design guidance through sections 2.4-2.6 which has been reflected within the submitted application drawings and documents, including the provision of accessible bedrooms (5% with a further 5% adaptable) and identifying the provision of soundproofing, overall good levels of daylight/sunlight and natural ventilation with dual aspect outlooks for shared living rooms, or at least a reasonable exterior outlook, where possible.
- 7.32. The design, location and delivery of the proposed PBSA remains principally unchanged from the July 2024 submission to the extent that no additional assessment is required in light of the adoption of the LPG when read as a whole.

## Workspace, including Affordable Workspace

### *Relevant Policy Context*

- 7.33. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"><li>- Policy PLV2: Earl's Court Opportunity Area</li><li>- Policy SA2: Earl's Court Exhibition Centre</li><li>- Policy BC1: Business uses</li><li>- Policy BC3: Affordable workspace</li><li>- Policy TC1: Location of town centre uses</li></ul>

### *Assessment*

- 7.34. This section should be read in conjunction with the submitted Commercial Strategy Addendum and appended Office Impact Assessment ("OIA") and RBKC and LBHF Town Centre Impact Assessment ("TCIA") Addendums.
- 7.35. The proposed quantum of non-residential floorspace and range of uses for the Outline Components remains as proposed in July 2024, other than a 20,000 sqm (GEA) reduction of the maximum office floorspace that can be delivered in LBHF, which is proposed to address post-submission feedback regarding agreement of a planning condition to a

minimum of 2,000 residential units in LBHF. This has the effect of reducing the residual maximum area that remains for non-residential uses. Incidental changes have also been made to non-residential Detailed Components in RBKC and LBHF.

- 7.36. Overall, the assessment set out in the 2024 Planning Statement remains unchanged and the principle of the delivery of a substantial quantum of workspace as part of the Hybrid Planning Applications has been accepted by the GLA, RBKC and LBHF officers and their specialist consultants (Iceni for RBKC and Aecom for LBHF). It has also been accepted that the sequential test is passed and the GLA in particular has expressed its support for the creation of a Major Town Centre within the Opportunity Area. Questions have, however, been raised by RBKC and LBHF officers and their consultants in relation to the proposed Commercial Strategy and further information requested to support the location, scale and potential impact of the proposed strategy on nearby centres in RBKC and LBHF.
- 7.37. The submitted Commercial Strategy Addendum and appended OIA provide further justification for the proposed Commercial Strategy. The Commercial Strategy Addendum is informed by updated market analysis and commercial agent advice from Knight Frank and JLL, in addition to the OIA prepared by Urban Shape. It provides further detailed explanation of the Commercial Strategy and its benefits, including the rationale behind the proposal to create a new employment hub at Earls Court, which responds positively to the drivers and objectives of the London Growth Plan and LBHF Upstream updated industrial strategy documents published since the July 2024 Hybrid Planning Application submissions.
- 7.38. The Commercial Strategy Addendum also explains that the scale and nature of the proposed workspace proposed by the Updated Proposed Development will form a significant part of the development of the West London market that has already seen the delivery of development at White City and Olympia in recent years, which are also identified as important contributors to the goals of the Upstream strategy in LBHF. The area is expected to see significant market growth over the coming years, supported by the 'flight to quality' as increasing numbers of businesses look to co-locate in accessible locations offering a sufficient range of flexible, high quality workspaces to meet operational requirements. The Updated Proposed Development will be well positioned to capitalise on these developing market trends, while proposing sufficient flexibility to ensure that it is not reliant on a specific market or industry to deliver the ecosystem of workspaces that is envisaged by the Commercial Strategy.
- 7.39. While not strictly required by planning policy, an OIA has been submitted to address consultation feedback and provide further support and justification for the Commercial Strategy in relation to the acceptability of the proposed office floorspace and its impact on local town centres and protected employment centres. The OIA takes account of updated Knight Frank and JLL market analysis and considers the nature of impact on each of the town centres and protected employment locations near the Site in RBKC and LBHF as a result of the Updated Proposed Development, having regard to relevant planning policy. It concludes that the Updated Proposed Development will not have a significant adverse effect on the network of existing centres in the local area or planned investment in RBKC and LBHF. It will instead deliver a network of high quality work spaces that will provide significant employment growth on the Site and encourage investment in the wider area, in

line with the aspirations of the development plan, the London Growth Plan and LBHF Upstream.

- 7.40. The further information that has been submitted adds further weight to the assessment findings of the July 2024 Planning Statement, which conclude that the proposed workspace forming part of the wider mixed-use Updated Proposed Development is in accordance with the Development Plan, and the impact and sequential tests are passed.

## Culture

### *Relevant Policy Context*

- 7.41. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy HO3: Community Housing</li> <li>- Policy T4: Streetscape</li> <li>- Policy BC2: Creative and Cultural Businesses</li> <li>- Policy TC7: Art and Culture uses</li> <li>- Policy TC10: South Kensington Strategic Cultural Area</li> <li>- Policy PLV2: Earl's Court Opportunity Area</li> <li>- PLV14: Earl's Court</li> <li>- SA2(d,g,l): Earl's Court Exhibition Centre</li> </ul>

### *Assessment*

- 7.42. This section should be read in conjunction with the submitted Commercial Strategy, Commercial Strategy Addendum, Town Centre Impact Assessment, Town Impact Assessment Addendum, as well as submitted Cultural (Rev 01 update) and Retail Strategies.
- 7.43. This section of the assessment takes account of the following amendments that are proposed as part of the Updated Proposed Development:
- A new Cultural Strategy document has been submitted to replace and expand on the content of the original July 2024 version. Additional clarification is provided regarding the vision, with further supporting evidence and updated policy context. It also sets out practical steps for creating an innovative cultural and creative neighbourhood.
  - A maximum of 14,000 sqm (GEA) of cultural (Class F / Sui Generis) floorspace is proposed across the two Hybrid Applications, comprising up to 7,000 sqm in RBKC and up to 7,000 sqm in LBHF. Minimum amounts of cultural floorspace to be delivered are also proposed by the Applicant, secured by appropriately worded obligations to be included in the Section 106 Agreements associated with planning

permissions for the Hybrid Planning Applications, the details of which are the subject of on-going discussion with officers.

7.44. Overall, the above amendments represent an improvement to the Cultural aspirations across the Earls Court Development and will continue to deliver the vision within relevant policy and guidance as stated within the June 2024 Planning Statement.

Retail and Leisure

Relevant Policy Context

7.45. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
RBKC New Local Plan	<ul style="list-style-type: none"><li>- Policy PVL14: Earl’s Court</li><li>- Policy SA2: Earl’s Court Exhibition Centre</li><li>- Policy TC1: Location of town centre uses</li><li>- Policy TC2: Nature of development within Town Centres</li><li>- Policy TC3: Diversity of uses within Town Centres</li><li>- Policy T3: Living streets and outdoor life</li></ul>

Assessment

7.46. This section should be read in conjunction with the submitted The submitted Town Centre Impact Assessment (“TCIA”) Addendums A (in relation to the RBKC Hybrid Planning Application) and B (in relation to the LBHF Hybrid Planning Application), which have been prepared to respond to post-submission consultation feedback from RBKC and LBHF officers and their specialist consultants (Nexus for RBKC and LSH for LBHF).

7.47. The quantum of retail and leisure floorspace within the Updated Proposed Development remains as previously proposed with the exception of minor incidental changes to Detailed Component ground floorspace in RBKC and LBHF due to internal reconfiguration to address updates to fire safety regulations. The conclusions of the July 2024 Planning Statement assessment remain as previously stated and the findings of reports provided by Nexus and LSH provide support for the principle of the proposed retail strategy and mix and quantum of the proposed town centre uses and agree that the sequential test is passed. The further information that has been submitted with in TCIA Addendums A and B has been provided in response to consultation feedback regarding retail impact on local centres and further substantiates the conclusions of the TCIA that was submitted in July 2024.

Hotels

Relevant Policy Context

7.48. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- TC8: Hotels and other forms of tourist accommodation</li> <li>- Policy T9: Servicing</li> </ul>

### *Assessment*

- 7.49. This section of the assessment takes account of proposed additional flexibility to provide up to 16,000 sqm of hotel floorspace within Development Zone K, and an increase in the maximum amount of hotel floorspace that may be delivered in development Zone M by 4,000 sqm. The maximum number of proposed bedrooms is increased to 200 within RBKC to account for this change.
- 7.50. The potential provision of hotel floorspace would serve both the business and tourist markets and support the cultural and commercial strategies for the Updated Proposed Development. There are no changes to the assessment findings as stated in the 2024 Planning Statement.

## Social Infrastructure (Community, Health and Education)

### *Relevant Policy Context*

- 7.51. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy SI1: Social infrastructure and facilities</li> <li>- Policy T6(b): Active Travel</li> </ul>

### *Assessment*

- 7.52. This section of the assessment takes account of the following minor changes that are proposed as part of the Updated Proposed Development:
- Increase in proposed nursery floorspace located within the ground floor of Plot EC06 within the RBKC Detailed Component; and
  - Decrease in community and social infrastructure floorspace within the LBHF Detailed Component which are the result of internal layout reconfiguration.
- 7.53. These minor amendments do not affect the assessment findings contained in the July 2024 Planning Statement.



## Design

### *Relevant Policy Context*

- 7.54. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	<ul style="list-style-type: none"> <li>- Para. 124: making as much use as possible of previously developed brownfield land and give substantial weight to the value of using suitable brownfield land to meet identified needs for housing</li> <li>- Para.129: decisions should support development that makes efficient use of land.</li> </ul>
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy CD1: Context and Character</li> <li>- Policy CD2: Design quality, character and growth</li> <li>- Policy CD7: Tall buildings</li> <li>- Policy CD14: Views</li> <li>- Policy CD15: Fire Safety</li> <li>- Policy CD2: Design quality, design and growth</li> <li>- Policy HO3: Community Housing</li> <li>- Policy HO4: Housing size and standards</li> <li>- Policy HO5: Specialist housing</li> <li>- Policy SA2: Earl's Court Exhibition Centre</li> <li>- Policy PLV1: Earl's Court Opportunity Area</li> <li>- Policy PLV14: Earl's Court</li> <li>- Policy GB15: Green Infrastructure</li> <li>- Policy GB16: Parks, gardens, open spaces and waterways</li> </ul>

### *Assessment*

- 7.55. This section should be read in conjunction with the submitted Parameter Plans (Rev P02), Design Code (Rev 1) and DAS Addendum Volumes 1, 2 and 3.
- 7.56. The principle of the vision, layout and general design composition for the Proposed Development has, overall, been positively received by officers, statutory consultees and members of the public. This is testimony to the extensive pre-application process that was undertaken and feedback that was taken into account in preparing the Hybrid Planning Applications.
- 7.57. The Updated Proposed Development includes a range of design amendments to the Proposed Development which have been made to address detailed matters raised in consultation feedback or changes to relevant guidance, but are minor when considered in the context of the development when considered as a whole. When taken individually or cumulatively they do not comprise material changes.

- 7.58. A series of changes have been made to the buildings that comprise the Detailed Component in both Hybrid Planning Applications, principally to take account of updated fire regulation requirements and address detailed design-related feedback from RBKC and LBHF officers. These have resulted in internal layout changes and incidental external design and footprint increases to accommodate additional building cores.
- 7.59. Through regular engagement with RBKC and LBHF officers, a number of incidental changes have also been made to the Control Documents in response to feedback received and to ensure consistency across the documents submitted for approval in relation to the Outline Components. These generally relate to updates to the contents of Parameter Plans to provide clarity or refine plan details and new or amended Design Codes within the updated Design Code.
- 7.60. The design changes between them contribute to the enhancement of the design quality for the Updated Proposed Development, which has been achieved through an on-going design-led process but given their overall minor nature, the findings of the assessment for this section remain as set out in the July 2024 Planning Statement.
- 7.61. The following sub-sections consider particular elements of the design of the Updated Proposed Development for clarity.

## Landscape and Public Realm, including Urban Greening Factor

### *Assessment*

- 7.62. This section should be read in conjunction with the submitted DAS Volume 1: Outline Component DAS Volume 1: Outline Component Addendum, Design Code Rev 01, ES and ES Addendum.
- 7.63. This section of the assessment takes account of the additional or amended information summarised below that is submitted as part of the Updated Proposed Development.

### *Outline Components*

- 7.64. In response to post-submission consultation feedback on the allocation of play space and planted areas, additional information has been provided to show play space areas in relation to the illustrative design for the Outline Components:
- Plant bed arrangements are altered to minimise overlap between play space calculations and planting that informs UGF and BNG calculations. UGF scores and BNG calculations are maintained, with a slight betterment of semi-natural vegetation shown within the BNG calculations.
  - Play space allocations for RBKC and LBHF have been kept within respective borough boundaries.
  - Additional play space has been located on plot rather than within the public realm.
  - Planting diagrams are updated to show undistributed habitats along the railway corridors north of the Table.

- Further opportunities for publicly accessible roof terraces have been explored, specifically within WK03, WK04 and WB08.

7.65. The submitted Temporary Uses Strategy Addendum includes additional information on hoarding treatments and the subsequent relationship with the public realm within Aisgill Gardens, the Table Park, Warwick Square and Empress Place.

#### *Detailed Components*

7.66. The following minor adjustments are proposed but do not alter the assessment as set out in the July 2024 Planning Statement:

#### *RBKC*

- The design of Warwick Lane has been reviewed in relation to updated fire regulations and fire tender tracking. Minor adjustments are made to planted areas to facilitate new access points.
- The EC04 3<sup>rd</sup> floor terrace layout on has been reviewed in respect of updated fire regulations to ensure all amenity areas are within 18m escape distance of the access point to EC05.
- 7th floor terrace layout for EC05 is amended to reflect updated fire regulations and escape distances.
- Development of planting palettes to include broader quantum of native species.
- A slight increase in the UGF score is achieved as a result of these amendments.

#### *LBHF*

- Relocation of public lift to the prominent corner of the Cascading Pavilions, facing Aisgill Gardens.
- Relocation of Service Access Road gate to the north.
- Review of external terrace layouts in respect of updated fire regulations to ensure all amenity areas are within 18m escape distance of the access point.

#### *Summary*

7.67. Given the minor nature of the above amendments, the findings of this assessment in relation to Landscape and Public Realm remain as stated in the 2024 Planning Statement.

## Density

#### *Assessment*

7.68. The assessment for this section remains as stated in the July 2024 Planning Statement aside from the provision of further density metrics and a comparison between the Illustrative Masterplan and maximum residential unit scenarios that have been requested by RBKC officers in relation to the RBKC Hybrid Planning Application in response to questions raised by members of the public. Confirmation is also provided in relation to the assumptions that

have informed the indicative figures in Table 25a below based on the density of the Updated Proposed Development not being definable at this stage as a result of its partially outline nature.

- 7.69. The London Plan identifies limitations associated with density metrics due to the definition of the red line extent or relationship with open space distorting the analysis, which has driven the move towards the more qualitative, or ‘design-led’, approach set out in London Plan Policy D3 and an acknowledgement that if they are to be referred to, there is a need for a combined reading of different metrics such as FAR, SCR and residential population figures (dph / hr/h), rather than identifying individual metrics in isolation. This is particularly the case for large scale, outline proposals, which form a large part of the Earls Court Development, as they are generally informed by averages that are necessarily based on a range of assumptions in relation to future delivery not known at the outline stage. The metrics referred to in supporting text to Policy D3 are understood to be retained in the London Plan primarily for data collection purposes and should carry little or no material weight in decision making.
- 7.70. The metrics that were included in the July 2024 Planning Statement were provided for information based on the Illustrative Masterplan. While an indicative dwelling mix is referred to in some chapters of the Environmental Statement (ES), the July 2024 Planning Statement explains that metrics, such as habitable rooms per hectare, were not included as they are indicative and based on the variety of assumptions mentioned above. However, metrics are provided in Table 25a below based on Illustrative Masterplan and ES Chapter Illustrative / Maximum assumptions, along with relevant inputs. These are provided for information only.
- 7.71. Average assumptions applied to density metrics for the Illustrative Masterplan in RBKC included in the submitted July 2024 Planning Statement comprise the following (including a minor update to reflect a more detailed site area noted in Development Specification Rev 1). These are benchmarked against average unit sizes across other emerging residential-led large scale developments:
- 1,088 residential dwellings
  - Average 70sqm per dwelling
  - Average 2 bedrooms / 3 habitable rooms per dwelling
  - Site area: 7.8575 hectares
- 7.72. ES Chapter 7 Indicative Maximum Residential Homes Unit Mix assumptions are used for residential dwelling mix (taken from ES Chapter 7 Table 7.4, which is unchanged in the submitted ES Addendum Volume 1A Chapter 7A).

Table 26a: Indicative Density Metrics – RBKC Hybrid Planning Application

Density Metric	RBKC Hybrid Planning Application (Illustrative Masterplan Scenario)	RBKC Hybrid Planning Application (Maximum Residential Unit Scenario)
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Early and All Phases		
Dwellings Per Hectare	138	178
Habitable rooms by hectare	415	474
Bedrooms by hectare	277	296
Bedspace by hectare*	N/A	N/A
Floor Area Ratio ("FAR")	3	3
Site Coverage Ratio ("SCR")	40%	40%

\*no older persons living, co-living or student accommodation bedrooms included in RBKC Illustrative Masterplan or Maximum Residential Unit Scenarios

- 7.73. Queries have been raised in consultation feedback in relation to the FAR level identified for the RBKC Hybrid Planning Application (236,443 sqm GEA Illustrative Masterplan floorspace / 78,575sqm site area = 3 FAR). This is comparable to other large scale regeneration projects such as Elephant Park and Canada Water (c.3.5 FAR) and is just one of the density metrics that simply divides floor area proposed by application site area, but this in effect suggests a consistent level of built form across the whole application site. In isolation, this is not a representative reflection of the reality of landscape-led proposed developments like the Earls Court Development.
- 7.74. The SCR referred to in Table 25a is also relevant to consider to give a more representative assessment of density alongside the FAR calculation as it provides an indication of the proposed proportion of public realm relative to the area identified for buildings. However, when the SCR is also considered (that reflects the occupancy of the development footprint as a proportion of the site area) this gives a truer appreciation of the proposed density alongside the proposed open spaces comparable with other large-scale regeneration sites in London.
- 7.75. Parameter Plan 004 – Development Zones, Maximum Building Lines and Public Realm shows a minimum of 40% of the Site is proposed to be covered by public realm and landscape, with up to the remaining 60% covered by Development Zones which will potentially comprise building footprint (all or in part). However, in reality, it is likely that the SCR across the RBKC site would be well below 60% (for instance, the SCR for the Illustrative Masterplan is c. 40% when routes between buildings and on-plot unbuilt areas are taken into account).
- 7.76. The assessment of the density of the Updated Proposed Development remains as set out in the July 2024 Planning Assessment in that it is the product of a design and landscape-led process and is acceptable for the redevelopment of this allocated, previously developed and underused brownfield land to make a strategic contribution to the delivery of open space, housing and jobs in a mix of land uses.

## Building Heights, Scale and Massing (Including Tall Building Statement)

### Assessment

- 7.77. This section remains the same as set out in the 2024 Planning Statement, save for minor alterations to proposed building heights (including a 3.5m reduction to the maximum perimeter envelope of Development Zone F (Development Plot EC03) and a refinement to Development Zone X) as a result of design changes. Minor changes have also been made to increase the footprint of buildings in the Detailed Components for both Hybrid Planning Applications to accommodate internal layout changes associated with design changes to address updated fire regulations.
- 7.78. The findings of the assessment in relation to building heights, scale and massing remains as stated in the 2024 Planning Statement. Please refer to Development Specification Rev 1 and PP006 Proposed Maximum Heights Parameter Plan Rev P02 for further details of amendments to the maximum building heights.

### Residential Amenity

- 7.79. This section should be read in conjunction with the Design and Access Statement Vol 1, 2 and 3 and associated Addendum Documents, the Parameter Plans Rev 1 and the Design Code Rev 1.
- 7.80. This section remains the same as detailed within the 2024 Planning Statement, save for updates to planning policy, and the removal of planning policy that is no longer in use, and the following amendments referred to below.

### Dual Aspect

- 7.81. There have been no updates to the Outline Component as detailed within the July 2024 Planning Statement.
- 7.82. The RBKC and LBHF Detailed Component has been designed to maximise the number of dual aspect units, which are set out in Tables 27 and 28 below:

Table 27a: Percentage of dual aspect homes in the RBKC Detailed Component		
Unit Aspect Type	EC05	EC06
Single aspect	13%	0%
Dual Aspect	87%	100%
LPG Duals Aspect	51%	78%
Habitable Dual Aspect Definition	36%	22%

Table 28a: Percentage of dual aspect homes in the LBHF Detailed Component		
Unit Aspect Type	WB04	WB05
Single aspect	0%	0%
Dual Aspect	100%	100%
LPG Duals Aspect	45%	67%
Habitable Dual Aspect Definition	55%	100%

- 7.83. As such, the provision of dual aspect units has been maximised throughout the RBKC and LBHF Detailed Component and single aspect north facing units have been avoided, in accordance with London Plan Policy D6 and intent of the LPG.

#### *Private Amenity Space*

- 7.84. This section remains the same as detailed within the July 2024 Planning Statement, save for updates to planning policy, the removal of planning policy that is no longer in use, and minor amendments to the RBKC Detailed Components which include a small increase in balconies on levels 1 and 2 of EC05 as well as a new terrace at level 7 (in response to comments from RBKC). The findings of this assessment in relation to Private Amenity Space therefore remain as stated in the 2024 Planning Statement.

#### *Playspace*

- 7.85. This section remains the same as detailed within the July 2024 Planning Statement, save for additional scenario testing following consultation feedback in relation to the allocation of play space and planted areas.
- 7.86. Testing has been undertaken to consider options that may reduce overlaps between areas identified for play and dense planting and is set out in the submitted Site Wide DAS Addendum. This demonstrates that it remains possible to achieve playspace requirements alongside a sitewide UGF score of 0.4 and above policy BNG targets. This is achieved through the identification of additional on-plot areas where playspace may be located on Development Plots within the Outline Component and is accompanied by a suite of segregation / separation methods to discourage access to planted areas. The scale and location of playspace and planted areas will be confirmed at RMA stage.
- 7.87. With regard to the Detailed Components, the overall quantum of playspace has been updated to reflect minor design changes to the proposed buildings. Further details and clarification have been provided across both detailed plots to cover quantum, child yield, type, age group provision and policy compliance.

#### *Accessible and Adaptable Homes*

- 7.88. The RBKC Detailed Component has been amended slightly with an increase and change in the mix for EC06 to provide more 2 bedroom / 3 person and 3 bedroom / 5 person

wheelchair units as well as restricting them to levels 2-4 only. There have been no such amendments to the LBHF Detailed Component or the Outline Component.

### *Summary*

- 7.89. The assessment findings in relation to residential amenity remain as stated in the July 2024 Planning Statement.

## Heritage and Townscape

### *Relevant Policy Context*

- 7.90. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	<ul style="list-style-type: none"> <li>- Paragraphs 210, 212 and 215: identifies the manner in which development impacting on a designated heritage asset should be assessed including the weighing of public benefits against them.</li> </ul>
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy CD3: Heritage Assets – Conservation Areas</li> <li>- Policy CD4(a): Heritage Assets - Listed Buildings</li> <li>- Policy CD6: Registered Parks and Gardens</li> <li>- PLV2(c): Earl's Court Opportunity Area</li> <li>- Policy SA2(o): Earl's court exhibition Centre</li> </ul>

### *Assessment*

- 7.91. This section should be read alongside the submitted ES Volume II Addendum (which includes the Heritage ES Chapter Addendum and Townscape and Visual Assessment ("TVA") and the Heritage Impact Assessment ("HIA") Addendums appended to the ES Addendum).
- 7.92. As detailed in the ES Addendum Volume 2 Chapter 2A, the Updated Proposed Development results in a slight difference in townscape compared to the Proposed Development, but would not alter the assessment or scope of effects reported in the July 2024 ES.
- 7.93. Minor improvements as a result of design changes have resulted in no additional or significant effects for the Updated Proposed Development. The additional Mund Street cumulative scheme would help transition building heights between the Updated Proposed Development and the Gibbs Green Estates, but would not alter the townscape or visual effects in the cumulative scenario.



- 7.94. Historic England has objected to the Proposed Development in its statutory consultation responses to the Hybrid Planning Applications, identifying Less Than Substantial Harm (“LTSH”) to the setting of Brompton Cemetery and St Cuthbert’s Church and conservation areas located adjacent or close to the Site. Responses from GLA, RBKC and LBHF also identify LTSH to these assets between them and all of the responses recognise the range of public benefits proposed, acknowledging that it will be responsibility of the LPAs to weigh the harm identified to the historic environment against any public benefits to the scheme.
- 7.95. The Gardens Trust consultation response queried whether design amendments could be made to mitigate visual impacts from Brompton Cemetery. Some visual relief has been provided via the Updated Proposed Development, however additional mitigation in the form of massing reductions would not be feasible given the scale of reduction that is likely to be required to address the concerns raised.
- 7.96. Having taken account of consultation responses received and design amendments made to Updated Proposed Development, the findings of this assessment in relation to Heritage and Townscape remain as set out in the 2024 Planning Statement.

## Fire Safety

### *Relevant Policy Context*

- 7.97. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>RBKC New Local Plan</b>	- Policy CG15: Fire Safety
<b>Fire Safety: Approved Document B</b>	- Updates to BS9991:2024 have resulted in the requirement for a number of design changes to ensure buildings are designed to minimise fire risks and provide safe access routes.

### *Assessment*

- 7.98. This section should be read in conjunction with the Site-Wide Fire Strategy (Rev 01) prepared by Hoare Lea, the Fire Statement: EC05 (Rev 01) and Fire Statement: EC06 (Rev 01) prepared by Hoare Lea, and the Fire Statement WB03 (Rev 01), Fire Statement WB04 (Rev 01) and Fire Statement WB05 (Rev 01) prepared by OFR Consultants.

### *Site-Wide Fire Safety*

- 7.99. This section of the assessment takes account of the following changes that are proposed as part of the Updated Proposed Development within the replacement Site-Wide Fire Strategy:

- Inclusion of additional information for the Site such as the proposed Illustrative Masterplan, number of storeys, land uses at Ground Level and predominant land uses
- Additional clarity regarding 'high risk buildings', including the relevant approval systems for applicable buildings
- Additional fire protection measures to cycle stores
- Inclusion of a Competency Statement
- Updates to Fire Service Access Routes
- Reference to a Fire Service Access maintenance plan to be incorporated into the Estate Management Plan, a consideration of potential uses within Plot EC07, and the proposal to extend and landscape the section of the WLL covered by the existing deck to the south

#### *RBKC Detailed Component*

- 7.100. In accordance with RBKC Adopted Local Plan Policy CD16(c), EC05 and EC06 have been the subject of a detailed review by a RBKC QDRP. RBKC officer and QDRP feedback has information proposed amendments to these Plots have been made to comply with BS:9991 which is set out in more detail within in the DAS Volume 2 Addendum. Notably, these amendments have altered the core arrangements, access and the usable terrace space for residents.
- 7.101. Additionally, and in line with the recommendations of the Building Safety Act, each building is now required to have its own dedicated life safety plant. As a result, the ground floor use in EC06 has been revised, replacing the workspace with a generator providing back up power to life safety systems. This also results in changes to the cycle parking provision and layout.

#### *LBHF Detailed Component*

- 7.102. The buildings have been amended to comply with BS:9991 and this is set out in more detail in the DAS Volume 2 Addendum. These amendments have altered the core arrangements and access resulting in isolated and minor changes to the footprint.

#### *Summary*

- 7.103. The majority of the above changes have been made to ensure compliance with Building Regulations. The findings of the planning policy assessment in relation to Fire Safety remains as set out in the 2024 Planning Statement.

## Sustainable Design

#### *Relevant Policy Context*

- 7.104. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	<ul style="list-style-type: none"> <li>- Para.161 requires the planning process to support the transition to net zero by 2050.</li> <li>- Para. 164 notes that new development should be planned to help reduce greenhouse gas emissions.</li> </ul>
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy GB3: Whole life-cycle Carbon</li> <li>- Policy GB4: Energy and Net Zero Carbon</li> <li>- Policy GB5: Overheating</li> <li>- Policy GB19: Waste Management</li> </ul>
<b>LBHF Supplementary Planning Documents</b>	<ul style="list-style-type: none"> <li>- Carbon Offset Cost Guidance Note: sets out development should maximise carbon savings through on-site measures.</li> </ul>

## Sustainability Strategy, including Socio-Economics and Energy Strategy

### *Assessment*

- 7.105. This section should be read in conjunction with the submitted Sustainability Strategy, Sustainability Strategy Addendum, Energy Strategy and Energy Strategy Addendum, BREEAM Strategy, Sustainability Statements and associated Addendums and Technical Notes for Plot EC05 and EC06, and WB03, WB04 and WB05 prepared by Hoare Lea; the ES Socio-Economics Chapter and ES Socio-Economics Chapter Addendum, the Social Value Statement, Economic Inclusion Statement, and the Economic Inclusion Statement Clarification Note.
- 7.106. The Applicant has engaged in post-submission consultation with GLA, RBKC and LBHF officers and specialist consultants (Hodkinson on behalf of RBKC and Aecom (regarding Energy on behalf of the GLA and Economic Inclusivity on behalf of LBHF) to discuss the proposed Energy and Sustainability Strategies. The principle of the approach to the proposed strategies has been supported throughout the application determination process with discussions focussed on clarification regarding the details of the proposed strategies and how they will be delivered. Discussions with officers are on-going in relation to appropriately worded planning conditions and Section 106 obligations to secure the delivery of the objectives of the strategies over the lifetime of the development.
- 7.107. The following further information has been provided to update the strategies to reflect design changes and address consultation feedback:
- Sustainability Strategy: updates to the Carbon Emissions within the Detailed Plots EC05, EC06 and WB04 following design changes to take account of BS 9991:2024 Fire safety requirements and additional information and clarification provided in relation to Energy, Whole Lifecycle Carbon and Circular Economy in relation to the Outline Components. There are no updates to LBHF Detailed Plots WB03 and WB05.

- Economic Inclusion: points of clarification contained in the Earls Court Development Economic Statement response to Aecom feedback on behalf of LBHF.
- Socio-Economics: updated housing delivery, social infrastructure demand and employment creation figures to reflect the Updated Proposed Development, including a consideration of Mund Street which has no change regarding the scale or significant of inter-project effects previously identified.
- Energy Strategy: Further information to support the site-wide peak load assessment, including:
  - Site-wide peak energy assessment, including methodology and profiles used for assessing peak electrical demands
  - Further commentary on measures to achieve demand reduction.
  - Initial appraisal of battery storage technology on-site.
- Supporting information regarding Photo Voltaic (“PV”) energy generation.
- Further information to demonstrate the ability to connect the heat network to future external networks.
- Provision of data sheets to support plant data.
- Updated ‘Be Lean’ regulated carbon emissions reductions following design changes made to the RBKC and LBHF Detailed Components (aside from Plot WB05) to take account of ‘BS 9991:2024 Fire safety requirements, which has resulted in improved reductions in carbon dioxide emissions ; and
- Further commentary to explain why waste water heat recovery is not provided in the Detailed Component.

7.108. With regard to Socio-Economics, the amendments to the Proposed Development have updated the quantum of construction jobs, on-site jobs and spending figures for the Early and All Phases contained within the July 2024 ES. The above referenced amendments do not change the overall findings of these assessments in relation to the Sustainability Strategy and Socio-Economics, which remain as stated in the July 2024 Planning Statement.

7.109. The findings in relation to updates to the Energy Strategy show an overall improvement in relation to carbon emissions as stated in the 2024 Planning Statement, which continue to exceed the requirements of National, regional and local planning policy in many respects, as set out in the July 2024 Planning Statement.

## Overheating Strategy

### *Assessment*

7.110. This section should be read in conjunction with the submitted Overheating and Thermal Comfort Statement, the Overheating and Thermal Comfort Statement Addendum, and the Sustainability Statements and associated Addendums for Plots EC05, EC06 and WB03, WB04 and WB05.

- 7.111. This section remains as set out in the 2024 Planning Statement, save for updates to overheating risk simulation following the introduction of BS 9991:2024 Fire safety requirements.
- 7.112. The above referenced changes are not significant enough to result in meaningful variance to the assessed performance in terms of Part L regulated energy consumption, CO2 emissions, overheating risk or whole life carbon emissions as per the submitted Sustainability Statements dated July 2024 for WB03, WB04 and WB05. On this basis, the findings of this assessment in relation to the Overheating Strategy remain as stated in the 2024 Planning Statement.

## Whole Lifecycle Carbon and Circular Economy

### *Assessment*

- 7.113. This section should be read in conjunction with the submitted Whole Lifecycle Carbon and Circular Economy Strategy, the WLC and Circular Economy Addendum, the Sustainability Statements for Plots EC05, EC06, WB03, WB04 and WB05 and the Framework Construction Site Waste Management Plan ("CSWMP") and CSWMP Addendum.
- 7.114. This section of the assessment takes account of the following changes proposed as part of the Updated Proposed Development:
- Construction Site Waste Management: the removal of Mund Street as a construction vehicle access point and an updated cut and fill assessment of maximum parameter plans.
  - Whole Lifecycle Carbon: Updated detailed component embodied carbon emissions following the introduction of 'BS 9991:2024 Fire safety requirements. The impact of these changes results in a negligible difference in embodied carbon for the plots compared to the previous (July 2024) results.
- 7.115. The above updates are minor in the context of the Updated Proposed Development and the findings of this assessment in relation to Whole Lifecycle Carbon and Circular Economy remain as stated within the June 2024 Planning Statement.

## Waste

### *Assessment*

- 7.116. This section should be read in conjunction with the replacement Operational Waste Management Strategy ("OWMS") Rev 01, the EC05 and EC06 Waste Management Strategy and associated Addendum, and the WB03, WB04 and WB05 Waste Management Strategy and associated Addendum.
- 7.117. This section of the assessment takes account of the following minor changes that are proposed as part of the Updated Proposed Development:

- Waste Management Strategy, Outline Components:
  - Alterations to floorspace figures , which has resulted in amendments to estimated residential and commercial / community waste volumes and weekly bin requirements; and
  - Reference to RBKC's preference for the avoidance of waste chutes, alongside separation of waste generation metrics and confirmation that where RBKC are unable to make the second weekly collection, ECDC will procure second weekly waste collection through either a commercial waste contractor or RBKC's trade waste team (to be secured through appropriately worded planning condition or Section 106 obligation).
- Waste Management Strategy, Detailed Components:
  - Minor amendments to RBKC waste arrangements for Plots EC05 and EC06 to respond to RBKC comments in relation to layout and access, and the footprint of refuse areas has been increased to accommodate additional bin stores. The bin store for the proposed nursery in EC06 has been relocated to Level 01.
  - The LBHF waste arrangements remain principally as submitted aside from minor amendments to WB05(T2) which reflects the change in servicing arrangements and waste collection which is now proposed from the Service Access Road, instead of Aisgill Avenue.

7.118. Having considered above amendments, the findings of this assessment in relation to household and commercial waste remain as stated in the 2024 Planning Statement.

## Transport

### *Relevant Policy Context*

7.119. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	<ul style="list-style-type: none"> <li>- Para. 110 relates to focussing development in sustainable locations with a genuine choice of transport modes.</li> <li>- Para.112 notes that local parking standards for all development should take into account the accessibility, type, mix and use of the development, public transport opportunities, local car ownership and the need to ensure an adequate provision of space for charging plug-in and ultra-low emission vehicles.</li> <li>- Para. 116 notes that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety.</li> <li>- Para. 117 notes that priority should first be given to pedestrian and cycle movements, address the needs of people with disabilities and reduced mobility, create places that are safe, secure and attractive, allow for the</li> </ul>

	<p>efficient delivery of goods, and be designed to enable charging of plug-in and other low emission vehicles in safe, accessible and convenient locations.</p> <ul style="list-style-type: none"> <li>- Para. 118 requires all developments that would generate significant amounts of movement to provide a travel plan.</li> </ul>
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy D1: Street network</li> <li>- Policy T3: Living streets</li> <li>- Policy T5: Land use and Transport</li> <li>- Policy T6: Active Travel</li> <li>- Policy T8: Car Parking</li> <li>- Policy T9: Servicing</li> </ul>

### Assessment

- 7.120. This section should be read in conjunction with the submitted Transport Assessment, Transport Assessment Addendum, Framework Travel Plans, Addendums to the Framework Travel Plans, the Transport ES Chapter and the associated ES Addendums.
- 7.121. Extensive post-submission engagement has taken place with GLA, TfL, RBKC and LBHF officers in relation to transport matters. Discussions have generally focussed on strategic and local modelling of anticipated effects that will result from the Updated Proposed Development, associated mitigation and Site access arrangements.
- 7.122. This section of the assessment takes account of the following updates and changes that are proposed as part of the Updated Proposed Development, which have been made as a result of the above engagement:
- Updated Public Transport Accessibility Level (PTAL) to account for the release of TfL's new WebCAT 3.0 database. Overall, the PTAL score remains the same as previously reported;
  - Updated trip generation information to address comments received from transport officers and inform strategic modelling;
  - Refined bus analysis to present the uplift in demand as a result of the Updated Proposed Development by bus stop and by route accessing each bus stop;
  - Updated access strategy and trip generation relating to the demolition and construction stage;
  - Updated highway network assessment including junction capacity assessments and micro-simulation modelling. Overall, updated assessments within the submitted Transport Assessment Addendum indicate that all junctions will continue to operate within capacity in the scenarios assessed except the A4 West Cromwell Road/North End Road (Early and All Phases), and Old Brompton Road/Warwick Road/Finborough Road (All Phases only), which will be the subject of mitigation to be secured through appropriately worded Section 106 / 278 Agreement obligations;
  - Inclusion of an assessment of the Early Phases scenario within the 2041 year;
  - Reduction in the number of access points proposed on Aisgill Avenue, resulting in two consolidated access points for pedestrians, cyclists and emergency service vehicles;

- In addition to measures referred to above, updated and refined and packages of mitigation are the subject of on-going discussions with officers, but are proposed to include:
  - Removal of Warwick Road cycle Lane in response to RBKC consultation feedback and provision of an alternative cycle access strategy;
  - updated cycle improvements on Lillie Road and Old Brompton Road;
  - improvements to pedestrian and cycle priority on Lillie Road/North End Road junction;
  - potential improvements to the A4 West Cromwell Road (subject to delivery of a TfL funded scheme of improvement works at the Warwick Road junction);
  - relocation of Beaumont Road pedestrian crossing;
  - changes to the traffic signal junction Earls Court Road/Old Brompton Road; review of Cluny Mews to St Cuthberts Lane connection;
  - preparation of Station Option Studies to inform appropriate station improvement contributions;
  - Santander Hire Docking Station provision;
  - space for micro-mobility facilities;
  - contributions towards delivery of bus stop improvements;
  - suite of management strategies; and
  - a monitor and manage approach to the implementation of mitigation.
- Updated car and cycle parking quantum;
- Removal of the allowance of consolidation within the delivery trip generation all land uses. The Servicing Strategy for the Site is not reliant upon the delivery of an on-site commercial logistics hub within Plot EC07; and
- Within the LBHF Detailed Plots, vehicular access from Aisgill Avenue to serve Plot WB05-T2 has been removed with servicing from the proposed service access road within the Site in response to LBHF feedback. The internal servicing and refuse arrangements have been subject to minor amendments to reflect changes to internal plot layouts.

7.123. Having regard to the submitted transport related addendum documents which have been amended following Stakeholder feedback, the findings of this assessment in relation to transport remain as stated in the 2024 Planning Statement.



## Environmental Considerations

### Demolition and Construction

#### *Relevant Policy Context*

- 7.124. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"><li>- Policy GB6(e): Air Quality</li><li>- Policy GB7: Construction Management</li><li>- Policy GB8: Noise and Vibration</li><li>- Policy GB19(g,i): Waste Management</li></ul>

#### *Assessment*

- 7.125. This section should be read in conjunction with the submitted Circular Economy Statement, ES Demolition and Construction Chapter, Framework Construction Management Plan, Framework Construction Traffic Logistics Plan, EC05 and EC06 Construction Method Statement, WB03, WB04 and WB05 Construction Management Statement, Framework Construction Traffics Logistics Plan RBKC and LBHF Addendum, Framework Construction Management Plan and Construction Management Statement EC05 and EC06 Addendum.
- 7.126. This section of the assessment takes account of the following changes proposed as part of the Updated Proposed Development:
- Removal of access/egress from Mund Street/Aisgill Avenue;
  - Updated calculations for earthworks, piling and substructure works with a resultant update to vehicle movements to take account of an additional area of excavation in Development Zone O, extension of below ground area in Development Zone N to include area the under the Cascades and an area for potential excavation below Development Zone X which has been increased. Relevant technical documents have been updated to reflect these amendments, including the Draft CTMP for the RBKC Detailed Component reflecting minor below ground changes to Plot EC06 which has been updated to comply with BS:9991.
- 7.127. The cumulative demolition and construction effects presented within the July 2024 ES remain valid for the Updated Proposed Development, and the findings of this assessment in relation to demolition and construction remain as stated in the 2024 Planning Statement.

### Archaeology

#### *Relevant Policy Context*

- 7.128. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	- Para. 207 notes that where a site includes/ has the potential to include heritage assets with archaeological interest, developers are required to submit a desk based assessment, and where necessary, a field evaluation.
<b>RBKC New Local Plan</b>	- Policy CD5: Scheduled Ancient Monuments and Archaeology

### *Assessment*

- 7.129. This section should be read in conjunction with the submitted ES Chapter 6, ES Chapter 6 Addendum, the Archaeological Desk Based Assessment (“DBA”), and the Archaeological DBA Addendum.
- 7.130. This section of the assessment takes account of two archaeological investigations within the study area have been added into the GLHER database. These investigations identified post-medieval remains of low heritage significance only and these additional findings have not altered the potential for or significance of archaeological remains within the Site.
- 7.131. While there would be amendments to areas of excavation, ground reduction and disturbance as a result of the Updated Proposed Development amended archaeological effects would not arise. On this basis, the July 2024 ES remains valid and the findings of this assessment in relation to archaeology remain as stated in the July 2024 Planning Statement.

## Health

### *Relevant Policy Context*

- 7.132. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	- Para. 98 provides guidance to help achieve healthy, inclusive and safe places, including planning positively for a range of local services, and ensuring an integrated approach to considering the location of the housing and economic uses, and the community facilities and services.
<b>RBKC New Local Plan</b>	- Policy SA2(g,v): Earl’s Court Exhibition Centre

### *Assessment*

- 7.133. This section should be read in conjunction with the ES Human Health Chapter and the ES Human Health Addendum. It takes account of the following changes proposed as part of the Updated Proposed Development:
- Consideration of post-submission ES points of clarification in response to Waterman feedback on behalf of RBKC and LBHF, including increased detail regarding community identity and social participation to confirm how end users influence these determinants and the population health effect conclusions are reached; and
  - Increased baseline indicator data added in relation to the housing determinant of health, focusing on affordability and tenure.
- 7.134. The consideration of post-submission clarifications in response to Watermans have resulted in additional non-significant effects within both the Early Phases and All Phases scenarios in relation to the general population for the air quality, climate mitigation and adaptation and noise and vibration health determinant assessments. Additional effects have also been identified within the Early Phases and All Phases Completed Development.
- 7.135. Notwithstanding the additional assessments outlined above, the findings of this assessment in relation to Human Health remains as stated in the 2024 Planning Statement.

## **Air Quality**

### *Relevant Policy Context*

- 7.136. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

<b>Policy Document</b>	<b>Policy or Para. Reference / Title</b>
<b>NPPF</b>	- Para. 199 requires air quality to be improved or impacts mitigated so far as possible.
<b>RBKC New Local Plan</b>	- Policy GB6: Air Quality

### *Assessment*

- 7.137. This section should be read in conjunction with the ES Air Quality Chapter, the ES Air Quality Chapter Addendum, the Air Quality Positive Statement, and the Air Quality Positive Statement Addendum. It takes account of the following information submitted or proposed to inform the Updated Proposed Development following receipt of feedback from, and engagement with, RBKC and LBHF officers:
- Amended minimum Air Quality Positive Statement requirements relating to the Implementation and Monitoring Plan for longer term targets;
  - Commitment to a number of planning conditions to secure design quality and reduce air quality exposure;

- Provision of a detailed qualitative assessment of emergency life safety back-up generators. As detailed within the 2024 ES, the effect on NO<sub>2</sub> concentrations at sensitive human health receptors were assessed as 'not significant' for the Early and All Phases development effects.
- Mitigation for air quality effects based on the national air quality objectives are not required for the Updated Proposed Development with regard to the Early and All Phases Demolition and Construction and Completed Development effects. Nonetheless, to align with the objectives of the LBHF Air Quality Action Plan 2018-2023 which commits LBHF to meeting the WHO AQG levels by 2030, additional mitigation is proposed to be secured through an appropriately worded planning condition. As a result, annual mean WHO 2021 Air Quality Guideline levels for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> will be used as trigger levels mitigation for the operational phases of the Updated Proposed Development, and for land uses where annual mean air quality objectives should apply as detailed in Box1-1 of Defra LAQM.TG(22) guidance.

7.138. The Proposed Development does not meet the LBHF Air Quality Action Plan 2018-2023 requirements where they require LBHF to meet the WHO AQG levels by 2030. Mitigation for air quality objectives such as this are not required for the Updated Proposed Development. Relevant mitigation may be secured via condition, if required by, and subject to agreement with, the LPA.

7.139. In EIA terms, no additional, new or different significant effects have been identified for the Updated Proposed Development and the findings of this assessment in relation to Air Quality remain as stated in the 2024 Planning Statement. It is proposed that identified mitigation is secured through appropriately worded conditions attached to any permissions for the Hybrid Planning Applications.

## Noise and Vibration

### *Relevant Policy Context*

7.140. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	- Para. 198 required development to mitigate potential adverse impacts resulting from noise
<b>RBKC New Local Plan</b>	- Policy GB8: Noise and vibration

### *Assessment*

7.141. This section is to be read in conjunction with the ES Noise and Vibration Chapter and ES Addendum. It takes account of updates to a number of impacts as a result of the Updated Proposed Development, which would be mitigated via appropriately worded conditions.

- 7.142. The Updated Proposed Development has resulted in increased noise disturbance from what was previously assessed. Nonetheless, this would not be to an unacceptable level with appropriately worded conditions secured, and the assessment within the 2024 Planning Statement in relation to Noise and Vibration remains valid.

## Ecology, Biodiversity Net Gain and Trees

### *Relevant Policy Context*

- 7.143. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy GB16: Parks, Gardens and Open Space</li> <li>- Policy GB17: Biodiversity</li> <li>- Policy GB18: Trees and Ecology</li> </ul>
<b>RBKC Supplementary Planning Document</b>	<ul style="list-style-type: none"> <li>- Trees and Development SPD</li> </ul>

- 7.144. This section should be read in conjunction with the Ecology ES Chapter, Ecology ES Chapter Addendum, the Preliminary Ecological Appraisal, the Preliminary Ecological Appraisal Addendum, the Biodiversity Net Gain Assessment and the Biodiversity Net Gain Addendum.

### *Ecology*

- 7.145. This section takes account of the following updates and changes proposed as part of the Updated Proposed Development in response to post-submission consultation comments:
- West London Line (“WLL”) SINCS in the event the Bioline is not delivered and the existing SINC is retained and enhanced;
  - WLL SINCS (whether retained or with the Bioline) from overshadowing, wind and artificial lighting. On balance, likely effects are not predicted to be significant in EIA terms;
  - Brompton Cemetery SINC (designated sites) from increased visitor footfall; and
  - Inclusion of 2021 invertebrate survey report and 2021 and 2024 bird surveys reports.
- 7.146. With regards to the WLL SINCS (designated sites), whether retained or with the Bioline, likely effects from enhancement or replacement of habitats and from overshadowing, wind and artificial lighting are predicted to be beneficial. On this basis, the findings of this assessment in relation to Ecology remain as stated in the July 2024 Planning Statement.

### *Biodiversity Net Gain ("BNG")*

7.147. This section takes account of the following updates and changes proposed as part of the Updated Proposed Development in response to post-submission consultation comments:

- Outline Component: new and amended landscaping and biodiversity Design Codes have been created in response to post-submission comments, alongside clarification of how BNG and UGF calculations differ and the provision of amended Illustrative Landscape Masterplan Area Changes for the All Phases scenario.
- Detailed Component: an assessment of the Updated Proposed Development (as a result of fire regulations) has resulted in slight amendments to the landscaping proposals of Plots WB04 and EC05.

7.148. Overall, there is no change to the landscape areas aside from a slight increase to semi-natural vegetation which is anticipated to result in a slight betterment to the post development habitats and their corresponding biodiversity unit scores. The July 2024 ES remains valid for the Updated Proposed Development, and the findings of this assessment in relation to BNG remain as stated in the 2024 Planning Statement.

### *Trees*

7.149. This section should be read in conjunction with the submitted Arboricultural Impact Assessment ("AIA") and the AIA Addendum.

7.150. The design changes included in the Updated Proposed Development do not affect the proposed tree planting strategy are not in proximity to retained trees. Therefore, the findings of the AIA Addendum remain as stated within the 2024 Planning Statement. Discussions with RBKC and LBHF are on-going with regard to agreement of appropriately worded planning conditions to secure relevant existing and proposed tree management and maintenance plans.

## Ground Conditions

### *Relevant Policy Context*

7.151. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	<ul style="list-style-type: none"> <li>- Para. 187 notes that remediating and mitigating contaminated land contributes to the enhancement of the natural and local environment.</li> <li>- Para. 196 requires ground conditions and risks arising from land instability and contamination is taken into account. Land should not be considered as contaminated after remediation.</li> </ul>

<b>RBKC New Local Plan</b>	- Policy GB20: Contaminated land
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### *Assessment*

- 7.152. This section should be read in conjunction with the submitted Ground Conditions ES Chapter and associated Addendum, Geo-Environmental Preliminary Risk Assessment, and Geo-Environmental Preliminary Risk Assessment Addendum.
- 7.153. This section takes account of the updates and changes proposed as part of the Updated Proposed Development in relation to excavation volumes and amended below ground areas at Development Zones O and X.
- 7.154. Having considered these amendments, the July 2024 ES remains valid for the Updated Proposed Development in respect of likely significant ground conditions effects and it is anticipated that appropriately worded planning conditions will be agreed with the LPAs to secure identified mitigation. The findings of this assessment in relation to ground conditions therefore remain as stated in the 2024 Planning Statement.

## Water Resources

### *Relevant Policy Context*

- 7.155. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

<b>Policy Document</b>	<b>Policy or Para. Reference / Title</b>
<b>NPPF</b>	<ul style="list-style-type: none"> <li>- Para. 181 requires authorities to ensure that planning applications will not increase flood risk elsewhere</li> <li>- Para. 164 requires inappropriate development at areas of flooding risk to be avoided by directing development away from areas at highest risk, and where necessary in such areas, ensuring the development will be made safe for its lifetime without increasing flood risk elsewhere.</li> <li>- Para.172 explains the aims of the Sequential Test</li> <li>- Para. 181 recommends that major development should incorporate sustainable drainage systems unless there is clear evidence this would be inappropriate.</li> </ul>
<b>RBKC New Local Plan</b>	<ul style="list-style-type: none"> <li>- Policy CD10: Basements</li> <li>- Policy SA2: Earl's Court Exhibition Centre</li> <li>- Policy GB11: Flood risk</li> <li>- GB12: Sustainable Drainage</li> <li>- GB15: Green Infrastructure</li> </ul>
<b>RBKC Supplementary Planning Document</b>	<ul style="list-style-type: none"> <li>- RBKC Strategic Flood Risk Assessment</li> </ul>

### *Assessment*

- 7.156. This section should be read in conjunction with the submitted ES Chapter 14, ES Chapter 14 Addendum, Flood Risk Assessment ("FRA") and Drainage Strategy, Integrated Water Management Strategy ("IWMS"), IWMS Addendum, Utilities and Service Infrastructure Strategy, Utilities and Service Infrastructure Strategy Addendum, and Drainage Statements for Plots EC05 and WC06, and Plots WB03, WB04 and WB05, prepared by WSP.
- 7.157. This section takes account of the following updates and changes proposed as part of the Updated Proposed Development:
- Updates to the Environment Agency Flood Map for Planning (March 2025), which has resulted in no change to the flood risk information provided within the Study Area;
  - Additional information regarding ground conditions, including details of groundwater monitoring to justify the assessment of groundwater flood risk and demonstrate the viability of the proposed infiltration strategy;
  - Further details regarding the existing surface water drainage regime, exceedance flow rates, the principles of SuDS interventions that would be incorporated into the Proposed Development and calculations for greenfield runoff rates;
  - Demonstration of how the proposed drainage infrastructure would be phased/delivered to accommodate the phasing strategy for the Proposed Development;
  - Provision of additional mitigation for sewer flood risk, alongside evidence of correspondence with Thames Water ("TW") to confirm that the TW sewer network has the capacity to accommodate forecast foul and proposed surface water discharge rates;
  - Consideration of the Mund Street School site redevelopment proposal, which concludes no inter-project cumulative effects are likely to arise on the basis that standard practice mitigation measures (CEMP, SuDS strategy and FRA) are adopted and secured for both Mund Street and the Updated Proposed Development;
  - Details of the TW sitewide water demand modelling study (April 2025), which indicates reinforcement / mains extensions would be required within Phase 1 and Phase 4 of the Proposed Development;
  - RBKC Detailed Component: additional information is provided to confirm the potential for rainwater re-use and the specific SuDS measures that are proposed within Plots EC05 and EC06;
  - LBHF Detailed Component: additional information is provided to clarify the proposed SuDS provision to each plot (including green roof areas and the benefits of the proposed SUDS measures), the flood risk associated with groundwater and the local sewer network, and the proposed water re-use strategy.
- 7.158. Having considered this updated information, it is concluded that the July 2024 ES remains valid for the Updated Proposed Development in respect of likely ground conditions effects and it is anticipated that appropriately worded planning conditions will be agreed with the



LPAs to secure identified mitigation. The findings of this assessment in relation to Water Resources remain as stated in the 2024 Planning Statement.

## Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill

### *Relevant Policy Context*

- 7.159. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
<b>NPPF</b>	- Para. 130 notes that a flexible approach should be taken towards daylight and sunlight where it would inhibit making effective use of the site, subject to the resulting scheme providing acceptable living standards.
<b>RBKC New Local Plan</b>	- Policy HO3: Community Housing

### *Assessment*

- 7.160. Impacts on external (i.e. in relation to properties neighbouring the Site) and internal (i.e. within the Proposed Development) daylight and sunlight levels have been assessed, along with overshadowing, solar glare and light spill, within the Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill ES Chapter, Contextual Daylight, Sunlight and Overshadowing Report (which is appended to the ES Chapter), the Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill ES Addendum Chapter, the Internal Daylight, Sunlight and Overshadowing Report, the Internal Daylight, Sunlight and Overshadowing Technical Addendum the Amenity within the Site: Internal Daylight, Sunlight and Overshadowing Assessment EC05 and EC06 Revision 01, and the Amenity within the Site: Internal Daylight, Sunlight and Overshadowing Assessment WB03, WB04 and WB03 Revision 01 submitted as part of the Hybrid Applications.
- 7.161. This section takes account of the updates and changes proposed as part of the Updated Proposed Development, which have been considered in the Addendums referred to above, which has included re-assessment to take account of the proposed design changes.
- 7.162. Overall, the conclusions of the July 2024 ES are considered to remain valid regarding external sunlight, overshadowing, solar glare and light spill. The re-assessment has resulted in a slight betterment of daylight effects, and clarification updates have resulted in minor changes to the figures reported within the external daylight and sunlight findings.
- 7.163. With regard to Internal Daylight, Sunlight and Overshadowing, whilst the proposed amendments could result in deviations from the values presented for the Outline Components in the July 2024 ES, given their limited nature they would not change the overall findings and conclusions of the originally submitted assessment. A Technical Addendum has been submitted which confirms this.

- 7.164. For the RBKC and LBHF Detailed Components, updates to internal layouts (to ensure fire safety compliance) have resulted in a replacement assessment being submitted, which confirms compliance with the BRE Guidance. The assessment of internal daylight, sunlight and overshadowing for the Detailed Plots remains as set out in the July 2024 Planning Statement.
- 7.165. While the proposed amendments will result in some deviations between the values presented for the Proposed Development and Updated Proposed Development, given their limited nature, they would not change the overall findings and conclusions of the assessment within the July 2024 Planning Statement.

## Wind

### *Relevant Policy Context*

- 7.166. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
RBKC New Local Plan	- Policy CD8: Living Conditions

### *Assessment*

- 7.167. This section should be read in conjunction with Volume 1, Chapter 16, Wind of the ES and Volume 1, Chapter 16, Wind of the ES Addendum.
- 7.168. This section remains as set out in the 2024 Planning Statement, save for an assessment of additional receptors, and amendments to the list of cumulative schemes.
- 7.169. The updated assessment concludes that the July 2024 ES remains valid for the Early and All Phases Development scenarios of the Updated Proposed Development and Cumulative Schemes. The assessment results for the additional receptors would also be the same for the Early and All Phases in isolation. On this basis, the findings of this assessment with regard to wind remains as stated in the July 2024 Planning Statement.

## Climate

### *Relevant Policy Context*

- 7.170. The relevant policy context for this section remains as stated in the July 2024 Planning Statement, aside from the following:

Policy Document	Policy or Para. Reference / Title
RBKC New Local Plan	- Policy GB2: Circular Economy - Policy GB3: Whole Life-Cycle Assessment

	<ul style="list-style-type: none"> <li>- Policy GB4: Energy and Net Zero Carbon</li> <li>- Policy GB5: Overheating</li> <li>- Policy GB12: Sustainable Drainage</li> </ul>
<b>RBKC Supplementary Planning Document</b>	<ul style="list-style-type: none"> <li>- RBKC Strategic Flood Risk Assessment</li> </ul>
<b>LBHF Supplementary Planning Document</b>	<ul style="list-style-type: none"> <li>- Carbon Offset Guidance Note</li> </ul>

### *Assessment*

- 7.171. This section should be read in conjunction with Volume 1, Chapter 17, Climate of the Environmental Statement and the associated Addendum.
- 7.172. This section remains as set out in the 2024 Planning Statement, save for minor clarifications and updates that include an assessment of the Updated Proposed Development, and a review of the Carbon Budget Data.
- 7.173. The updated assessments conclude that the climate effects reported in the July 2024 ES (climate resilience, in-combination and greenhouse gas emissions) remain valid for the Updated Proposed Development, with the exception of the Green House Gas (“GHG”) Emissions Assessment which predict a minor increase in emissions within the Early and All Phases Demolition and Construction scenarios and the Early Phases Completed Development scenario. The All Phases Completed Development scenario shows a small decrease in predicted emissions.
- 7.174. Having regard to this minor change, the findings of this assessment in relation to Climate remain as stated in the July 2024 Planning Statement.

## 8. Community Infrastructure Levy and Section 106 Agreement

### Community Infrastructure Levy (“CIL”)

- 8.1 Updated CIL Additional Information Forms have been submitted alongside this Addendum to take account of changes to proposed floorspace in the RBKC and LBHF Detailed Components, but the proposed amendments will not give rise to any change to the overall position on CIL as reported in the July 2024 Planning Statement.

### Planning Obligations

- 8.2 As reported in the July 2024 Planning Statement, the Applicant has prepared draft Section 106 Agreement Heads of Terms. These are currently being discussed with RBKC and LBHF officers and relevant stakeholders. They substantially remain as documented in the July 2024 Planning Statement and are based on the commitments and identified mitigation measures from the suite of supporting planning application documents, as amended.

## 9. Public Benefits of the Proposed Development

- 9.1 The July 2024 Planning Statement describes the significant range of benefits that would result from the Proposed Development. The Updated Proposed Development and associated documents do not alter the significance of these benefits. The benefits continue to be substantial and wide ranging, and will be secured through appropriately worded planning conditions and obligations where necessary.
- 9.2 As previously described in the July 2024 Planning Statement, the scale and nature of the public benefits associated with the Updated Proposed Development, which have been recognised by the GLA in its Stage 1 consultation response, are considered by the Applicant to be so significant and transformative that the impacts identified in supporting assessments (as amended), will be demonstrably outweighed.

# 10. Conclusion

- 10.1 This Planning Statement Addendum is submitted to assess the proposed updates and changes to the Proposed Development (the “Updated Proposed Development”) in the context of the latest planning policy framework at the time of writing.
- 10.2 Section 38(6) of the Planning and Compensation Act 2004 requires the submitted Hybrid Planning Applications to be determined in accordance with the relevant Development Plan unless material considerations indicate otherwise. When assessing the Hybrid Planning Applications, the decision-maker is required to give full consideration to the provisions of the Development Plan and all other material considerations. They are also required to consider the likely significant environmental effects of the development.
- 10.3 Since the submission of the Hybrid Planning Applications to RBKC and LBHF in July 2024, the Applicant has monitored changes and updates to relevant planning policy and guidance documents, undertaken on-going engagement and consultation feedback has been received from a wide range of sources, including RBKC and LBHF, other statutory and non-statutory consultees, stakeholder groups and members of the public.
- 10.4 The Proposed Development as it was submitted in July 2024 represented a carefully considered composition which took account of significant stakeholder input over a three year pre-application process. The Hybrid Planning Applications have been positively received overall, with support for the vision and principle of the development, its landscaped approach and the significant numbers of homes and jobs it can deliver being a consistent theme, while concerns have been raised in relation to the scale of the Proposed Development and perception of its environmental effects.
- 10.5 The Applicant has worked with ECDC and the wider project team to make a series of updates and changes to the Proposed Development to address this consultation feedback and take account of updates to planning policy and guidance since the submission of the Hybrid Planning Applications. The updates and changes made are minor in the context of the Proposed development and many relate to points of clarification or adjustments, which is a reflection of the robust structure of the Proposed Development as it was originally proposed.
- 10.6 The proposed changes made to form the Updated Proposed Development do not materially alter the original assessment or conclusions of the July 2024 Planning Statement. While minor in nature, the proposed changes further enhance the acceptability of the Hybrid Planning Applications, particularly when considered together with the most recent updates to the NPPF and its strengthened presumption in favour of sustainable development and the wide-ranging and significant benefits that will be delivered.
- 10.7 This Planning Statement Addendum has considered the Updated Proposed Development, as set out within the two Hybrid Planning Applications, against relevant national, regional and local planning policy, relevant guidance and material considerations. It has been informed by the suite of updated and replacement application drawing and documents provide the necessary information relating to how the Updated Proposed Development has been assessed.

- 10.8 The Updated Proposed Development complies with the most relevant planning policies at national, regional and local levels. While there are some adverse impacts identified within the July 2024 Planning Statement, this Addendum and relevant supporting documents, including on neighbour amenity and heritage impacts, the Updated Proposed Development – in both the Early Phases Scenario and All Phases Scenario – is in overall conformity with the relevant Development Plans when read as a whole. The identified impacts are clearly and convincingly outweighed by the very significant tangible and intangible benefits in the July 2024 Planning Statement, which are summarised below and strengthened by the greater weight attributed to the presumption in favour of sustainable development and delivery of new homes, particularly in the context of the RBKC Hybrid Application, in the most recently published version of the NPPF.
- 10.9 Notwithstanding the above, if either LPA were to conclude that the Updated Proposed Development is not in general conformity with the relevant Development Plans, the contents of the July 2024 Planning Statement, this Addendum and information submitted as part of the Hybrid Applications demonstrate that there are very substantial and material considerations for the Hybrid Applications to be granted planning permission.
- 10.10 The Updated Proposed Development is the product of wide-ranging and meaningful engagement over a five year period. This has involved many different stakeholders and the Updated Proposed Development balances different priorities and considerations. The below reasons set out, in summary, why the Hybrid Planning Applications are acceptable in planning terms:
- The Updated Proposed Development will result in wide ranging and significant benefits that will transform a longstanding predominantly vacant and under-utilised brownfield Site to deliver a residential-led mixed-use development of strategic importance.
  - The Updated Proposed Development is the product of a carefully considered design-led process that has evolved through extensive engagement over five years to ensure a balance is struck between optimisation of development on the Site and the effects that result from it to deliver the maximum amount of public benefits. The outcome of this process is a landscape-led development that will rejuvenate the Site, create a new place consisting of generous public open spaces, beautiful buildings and tree lined streets designed by world class architects for the enjoyment of a wide range of people who will work, live and spend time in the development for many years to come.
  - The nature and scale of the Updated Proposed Development, including its contribution to the delivery of housing, affordable housing and job creation at a borough and London-wide level, is such that it is a development which would have an important and significant impact on the implementation of the London Plan and Borough Local Plans.
  - The Updated Proposed Development will provide a wide range of different uses, creating a new neighbourhood and destination for residents, workers and visitors. New homes, workspace, cultural venues, community, health, leisure facilities as well as retail uses will be created, thoughtfully arranged around significant new areas of high quality public realm, landscaping and open space.
  - The Updated Proposed Development meets the objectives and policies for the Site's Opportunity Area designation and relevant site allocations within the Development

Plans. It will also bring about much needed social, physical, economic and environmental transformation of this strategically important Site.

- The Updated Proposed Development has been robustly tested and assessed. Across a wide range of relevant topics, the supporting documents appropriately respond to and address Development Plan policy and supplementary planning guidance. As is usual for a major development of this nature, some adverse environmental impacts are likely and, where appropriate, mitigation has been identified and will be secured to address adverse impacts

- 10.11 The Applicant anticipates that appropriate, relevant, reasonable and necessary planning conditions and planning obligations will be secured to ensure that the Updated Proposed Development is acceptable in planning terms and the identified environmental impacts are mitigated. The draft Section 106 Agreement Heads of Terms included in the July 2024 Planning Statement are the subject of on-going discussion with RBKC and LBHF officers and demonstrate, in broad and initial terms, the Applicant's commitment to ensuring that the key public benefits and necessary mitigations described in the July 2024 Planning Statement and this Addendum are secured.
- 10.12 The Earls Court Site represents a long-standing under-utilised brownfield development opportunity. The Site is hugely challenging, needing to overcome significant infrastructure constraints through investment. Its successful redevelopment, creating a place and destination in line with the objectives of the relevant Development Plans, requires collaborative efforts from stakeholders. Significant engagement has occurred to date, and the Applicant looks forward to further engagement during the remaining determination period for the Hybrid Planning Applications with all stakeholders. Most importantly, ongoing coordination and collaboration between the Applicant, RBKC, LBHF, the GLA and TfL will be needed to ensure the policy ambitions for the Site are realised.
- 10.13 For the reasons outlined above, the Applicant remains of the view that planning permission should be granted for the Hybrid Planning Applications without delay.



# Appendices

## Appendix 1A

### Planning History

The below table lists the relevant planning history for the Site.

Site Planning History			
Reference	Address	Description of Development	Decision
LBHF			
2022/01426/FUL	9 Beaumont Avenue London W14 9LP	Change of use and refurbishment of the former Mannequin Factory (Class B2) to a combined theatre/performance space with restaurant and bar areas (Sui Generis use), along with the use of the rear section of site as a church (Class F1 (f)), for a temporary period of 5 years.	Approved 1 November 2022
2023/00114/FUL	1 Empress Approach London SW6 1TW	Temporary change of use of the ground floor from a Metropolitan Police careers advice centre to a public exhibition space (Use Class F1), for a period of five years.	Approved – 9 March 2023
2024/02746/FUL	Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	The continued temporary use of the existing building on the site for a 'live entertainment' use until 31 December 2027.	Approved – 5th December 2024
2024/02875/VAR	Earls Court 2 Empress Approach London SW6 1TW	Variation of Condition 3 to allow an amendment to planning permission (ref. 2023/02631/FUL) dated 10 October 2023 for the temporary installation of five padel courts, with associated enclosures, entrance arch structure and floodlighting; comprising six - single and two-storey portable units (including food stalls, wellness room, bar, office and reception), for use as outdoor padel sports and recreation (Class F.2) with access from Empress Place, for an operational period from October 2023 until 31 December 2025, associated groundworks, drainage, means of enclosure, lighting, servicing and cycle parking.	Approved – 14th March 2025

Site Planning History			
Reference	Address	Description of Development	Decision
2025/00024/FUL	Earls Court 2 Empress Approach London SW6 1TW	Use of part of the former 'Earls Court Exhibition Centre 2' site, for a temporary period of two years (including installation and de-installation works), for a 'Stone Demonstrator' (ground plus two storey open sided framed structure), with the purpose of educating construction industry specialists and the general public about using stone in construction works; including a pocket park, outdoor seating areas, fencing, a programme of events and all other associated works.	Approved – 2 April 2025
2025/00161/FUL	Earls Court 2 Empress Approach London SW6 1TW	Temporary use of part of the former 'Earls Court Exhibition Centre 2 site', for an operational period from April 2025 to December 2027 for community, leisure, cultural and sporting uses, including the erection (not including installation and de-installation) of an open public access route, flexible pop-up food and beverage area comprising up to 6 units, and various structures, means of enclosure, outdoor seating, and associated servicing, alongside all other associated works with the various temporary events during the operational period ('Existing Temporary Permission: ref: 2022/03129/FUL dated 23 January 2023).	Approved – 6 June 2025
2025/01364/FUL	Empress State Building Empress Approach London SW6 1TR	The installation of Air / Water Source Heat Pumps, generators, an associated substation, relocation and reduction in size of an existing container and re-arrangement of car parking spaces.	Pending Approval



