
ROYAL BOROUGH of KENSINGTON and CHELSEA

PROPOSED SUBMISISON CORE STRATEGY

FOR THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA WITH A FOCUS ON NORTH KENSINGTON

Representations by Capital & Counties on behalf of the Earls Court and Olympia Group

1.0 INTRODUCTION

- 1.1 These representations are submitted by Capital & Counties (C&C) on behalf of Earls Court and Olympia Group with regard to the Earls Court exhibition centre (known as EC1 and EC2) and surrounding land. The freehold of EC1 and EC2 is owned by London Underground Limited (LUL). EC1 and EC2 lie adjacent to the Lillie Road Depot also owned by LUL, and the West Kensington and Gibbs Green housing estates owned by LBHF. The combined holdings total 27 hectares and present a significant redevelopment opportunity, referred to in this submission as the Earls Court Regeneration Area (EC Regeneration Area). A plan of the EC Regeneration Area is attached at **Appendix 1**. TfL support C&C's representations as set out in its letter at **Appendix 2**.
- 1.2 The EC Regeneration Area straddles the borough boundary between the Royal Borough of Kensington and Chelsea (RBKC) and London Borough Hammersmith & Fulham (LBHF). It is recognised by both authorities as a development opportunity in their respective Core Strategies. The portion of the EC Regeneration Area within RBKC (7 hectares) comprises the Earls Court Strategic Site identified in the Proposed Submission (PS) Core Strategy, October 2009, with some small boundary changes being required to reflect the plan set out at Appendix 1 (see also C&C's requested amendments to the "Strategic Site: Earls Court" plan at page 345 of the PS Core Strategy). The remainder of the site (20 hectares) is currently described in LBHF's Core Strategy Options document (June 2009) as "the West Kensington, Earls Court, North Fulham Regeneration Area" and as a Strategic Site. For clarity C&C has requested terminology changes to ensure consistency between the LBHF Core Strategy and the RBKC Core Strategy in how the wider EC Regeneration Area and the relevant RBKC Area and LBHF Area components are described. This is reflected in the detailed representations below (Section 4.0).

- 1.3 The EC Regeneration Area is being promoted as an Opportunity Area in the draft Replacement London Plan (RLP). Opportunity Areas are identified in the RLP as “the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility”. It advises that development densities for residential and non residential development should be optimised. The EC Regeneration Area is identified as a “significant opportunity for regeneration comprising estate renewal and housing and employment growth” recommending that “the potential for a strategic leisure, cultural and visitor attraction and strategically significant offices should be explored together with retail, hotels and supporting social infrastructure”.
- 1.4 It is clear that redevelopment of the EC Regeneration Area could realise a number of strategic objectives. The RLP suggests that the OA could create 7,000 new jobs and provide a minimum of 2,000 new homes, although analysis undertaken to date by C&C’s consultancy team demonstrates that the site is capable of accommodating significantly higher levels of development (Section 2.0) and GLA officers have also acknowledged in discussions with C&C that there is potential for additional floorspace within the EC Regeneration Area. The RLP advises that the optimum capacity for the site will be informed by a transport study which has been recently commissioned by TfL. The initial findings of the study are expected in Spring 2010. C&C has commissioned assessment of the basis of the draft RLP allocation which has demonstrated that GLA projections for office and housing requirements in this part of London are significantly underestimated. This evidence is being submitted as part of C&C’s representations on the RLP.
- 1.5 The principle of redevelopment of EC Regeneration Area is endorsed by both of the London boroughs. It has also been promoted by C&C in representations to their Core Strategies as well as in representations to consultation on the London Plan. The representations were supported by the Evidence Base summarised in Section 2.0 (with small adjustments in the case of LBHF submissions, reflecting the LBHF part of the site) in accordance with PPS12. This has comprised:
- representations to RBKC Issues and Options, December 2005
 - representations to RBKC Interim Issues and Options, February 2008
 - representations submitted to RBKC Towards Preferred Options, September 2008
 - representations including Evidence Base submitted to RBKC Places and Strategic Sites, May 2009
 - representations including Evidence Base to LBHF Core Strategy Options, June 2009
 - representations including Evidence Base to RBKC Draft Core Strategy, July 2009
 - representations including Evidence Base to Initial proposals for the Mayor’s London Plan, April 2009.

- 1.6 RBKC has incorporated some changes in response to C&C's representations as the Core Strategy has evolved. However, the Proposed Submission document requires further clarification and amplification to provide an appropriate basis for development proposals to come forward and the full potential of the Earls Court Regeneration Area (including the RBKC Area component) be realised. A copy of the Evidence Base previously submitted to the authorities accompanies these current representations and supports the changes being sought to PS Core Strategy.

2.0 EVIDENCE BASE

- 2.1 The following documents form the background evidence in support of these representations. A CD containing these documents is attached to this submission document.

Planning Policy Summary

Produced by DP9, it provides an overview of relevant planning policy relating to future development of the EC Regeneration Area. It evaluates the proposals being promoted in these representations, concluding that they accord with national and regional policy.

Earls Court Regeneration Area Framework

Produced by Urban Strategies Inc, it sets out the overall ambitions, area regeneration objectives and market context for the EC Regeneration Area, concluding with some key framework principles in relation to the EC Regeneration Area.

Design Principles Summary Study

Produced by Benoy, it describes the vision for the EC Regeneration Area and design principles to underpin future development proposals.

Summary Townscape and Tall Building Study

Produced by Robert Tavernor, it considers the townscape context for the EC Regeneration Area and scope for tall buildings on the EC Regeneration Area, concluding that the EC Regeneration Area, in principle is a suitable location for appropriately designed tall buildings.

Summary Socio Economic Study

Produced by King Sturge, it reviews socio-economic data of relevance to development of the EC Regeneration Area and concludes that the site is well placed to meet demand for new jobs and housing.

Office Land Use Summary Study

Produced by King Sturge, it considers the office market and potential for office development in a new urban quarter on the EC Regeneration Area. It concludes that the site could support a significant level of office floorspace.

Retail Land Use Summary Study

Produced by King Sturge, it considers the demand for retail floorspace to serve a new mixed use community on the EC Regeneration Area. It concludes that new facilities would be required primarily to serve those living, working and visiting the site.

Hotel Land Use Summary Study

Produced by King Sturge, it considers the hotel market and potential for hotel development on the EC Regeneration Area, which is considered to be strong.

Summary Culture, Destination and Leisure Land Uses Study

Produced by King Sturge and Locum Consulting, it considers consumer demand for leisure uses and the opportunity to create a destination venue as part of mixed use development of the EC Regeneration Area.

Housing Land Use Summary Study (separate volumes for RBKC and LBHF)

Prepared by RPS and First Base, it considers the need for additional housing and the opportunity for a substantial residential mixed income and tenure development creating a new community on the wider EC Regeneration Area. It also sets out the site potential in respect of housing delivery for the parts of the EC Regeneration Area within each respective borough, given their housing trajectory requirements.

Summary Transport Study

Produced by WSP and Halcrow, it considers the transport network serving the EC Regeneration Area and likely transport requirements generated by future development of the site.

Summary of Sustainability Approach

Produced by Hoare Lea, it reviews the sustainability measures that could be employed through redevelopment of the EC Regeneration Area.

Summary Infrastructure and Waste Study

Produced by Hoare Lea, Arup and WSP Environmental Ltd, it provides a preliminary assessment of infrastructure capacity, structural deliverability and waste management considerations for development of the EC Regeneration Area. It concludes that with appropriate measures and procedures in place, the site provides the opportunity for high density mixed use development.

- 2.2 C&C also produced previous background evidence in the form of a Summary Potential International Convention Centre Study produced by Locum Consulting, which considered the potential for an International Convention Centre to be located in the LBHF, with options including Olympia or otherwise the wider EC Regeneration Area (though not the EC1 or EC2 site). However, an ICC is not being actively pursued at this time within developing schemes for either Earls Court or

Olympia. The Summary Potential ICC Study is no longer thus being promoted by C&C as part of the RBKC Core Strategy evidence base.

- 2.3 It is important to note that this Evidence Base has been prepared with respect to the proposed EC Regeneration Area strategic site allocation based on an indicative Land Use Budget, rather than in support of a specific development scheme at this stage. There is clear evidence supporting the indicative Land Use Budget proposed for the EC Regeneration Area. The amount and level of evidence clearly supports a strategic site allocation at Core Strategy level in accordance with PPS12 guidance. This is acknowledged by RBKC in the PS Core Strategy and by the Mayor in the RLP.

Indicative Land Use Budget

- 2.4 The assessment work undertaken on behalf of C&C supports high quality and density and mixed use on the EC Regeneration Area, in accordance with the adopted London Plan objectives to make the best use of available sites and achieve maximum intensity of use compatible with local context, design and transport capacity considerations (policy 3A.3). This has led to the following indicative Land Use Budget for the EC Regeneration Area:

User Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

- 2.5 These areas represent floorspace ranges up to and including a total of 1,640,000 sqm. They are indicative at this stage but soundly based on the assessment work undertaken thus far. The Indicative Land Use Budget enables approximate parameters to be formulated for the EC Regeneration Area and demonstrates the potential for the EC Regeneration Area to deliver development of a strategic scale. Further analysis including outputs from the transport capacity study being carried

out by TfL will be required to tailor the land use mix and final quantum of development and its disposition across the EC Regeneration Area. This will help to inform a Planning Framework for the Opportunity Area which will be worked up by the GLA in consultation with the Boroughs, the landowners and other relevant parties and be further refined through a Masterplan process and as part of subsequent planning applications. A planning framework approach is promoted in the PS Core Strategy (para 26.3.4) and the RLP.

3.0 KEY THEMES SUMMARY

- 3.1 The PS Core Strategy incorporates some of the alterations proposed by C&C in previous representations, which is welcomed. Further modifications are appropriate, nonetheless, to acknowledge the full potential offered by the comprehensive development opportunity and its recognised status as a Strategic Site within an Opportunity Area and to ensure that the Core Strategy is sound. Section 4.0 contains the detailed representations, explaining why elements of the current draft are considered to be unsound and seeking text alterations to redress the position. The representations take in to account comments from RBKC officers in response to C&C's earlier submissions.
- 3.2 The following key themes cover the representations. The same themes have been raised on each occasion in C&C's previous representations.

Site/ area definitions and maps

- 3.3 C&C proposes modifications to the text to be consistent with the way the comprehensive site has been described in earlier representations submitted to RBKC, LBHF and the GLA. RBKC refer to the wider site description used in LBHF's Issues and Options document. However the wider site is known as the Earls Court Regeneration Area (EC Regeneration Area), as confirmed in C&C's representations to LBHF. The boundary of this site is shown on the plan at Appendix 1. Some adjustments are required to the Proposals Map on page 159 of the PS Core Strategy to reflect the appropriate boundary. Similarly, boundary adjustments are needed to the Strategic Site plan on page 345 to reflect the RBKC part of the wider site.
- 3.4 As a Masterplan scheme has to be worked up for the EC Regeneration Area, it is unknown at this point how land uses will be distributed across the comprehensive site and possibly apportioned between the two boroughs. Therefore, the representations propose that reference to the Earls Court Regeneration Area is added on a number of occasions in the PS Core Strategy to ensure that a reader of the document is fully cognisant of future development on the wider site and related matters. It should also provide a greater understanding of the spatial planning for this part of the Borough. In this regard, it would be helpful if the various plans/

diagrams are annotated to show the EC Regeneration Area, as illustrated on the Key Diagram.

- 3.5 The changes sought to the relevant plans are notated on the extracts at **Appendix 3**.

Places and strategic site allocation

- 3.6 Changes proposed to the area and site specific text in chapters 10 and 26 are shown at **Appendix 4** and **Appendix 5** (two versions are provided; with tracked changes to the PS Core Strategy text, and with the changes accepted i.e. a "clean" revised version). They seek to take in to account the full development potential of the EC Regeneration Area. The Planning Summary (Evidence Base) explains how future proposals for the EC Regeneration Area would comply with relevant national and regional policy.
- 3.7 The PS Core Strategy (para 10.3.8) refers to the possibility of an International Conference Centre (ICC) being developed within the existing Earls Court and Olympia complexes (Olympia is also owned by the Earls Court and Olympia Group). This reflects the development Vision promoted by LBHF in its Core Strategy Options (June 2009) and hitherto has been explored by C&C on the basis that such a development would be subject to viability and feasibility testing and as an alternative, may be provided on another suitable site in the locality. The RLP supports the principle of an ICC but more centrally located, within or on the fringes of the Central Activities Zone. However, the possibility of an ICC is no longer being actively pursued at this time. The enclosed representations respond to this shift in circumstances, providing for the scenario in which an ICC does not come forward. This change reflects a deliverable solution and is, therefore, effective and sound.
- 3.8 RBKC has been keen to seek a destination use in the event that the existing exhibition centre is redeveloped, albeit following masterplanning such a facility may be within the LBHF part of the site. This is recognised in references to the destination use being within the locus of Earls Court (para 26.2.3). C&C support this aim as part of the vision for the area but propose modifications to broaden the description in the PS Core Strategy to “significant cultural/ destination uses” to embrace a range of destination uses that may be appropriate to retain the site’s status, as explained in the Culture, Destination and Leisure Study (Evidence Base). The proposed changes also ensure a consistency in terminology where there are references to this facility across the document. The changes provide additional clarity and a development allocation that could be achieved.
- 3.9 The representations to the Strategic Site text propose changes to clarify that the 10,000 sqm floorspace allocated on the site relates to “non residential” land uses rather than purely offices and retail. Elsewhere, the PS Core Strategy confirms that the site would be suitable for other uses including the cultural destination use

mentioned above and hotels (policy CF8). The Evidence Base reinforces the range of uses the site could deliver. This is also consistent with the land use mix envisaged in the RLP (see para 1.3 above). C&C's changes also propose that the floorspace figure should be a minimum. The Evidence Base supports a Land Use Budget for the EC Regeneration Area that is capable of delivering a quantum of development in excess of the scale (proportionately) sought by RBKC on the Strategic Site. The London Plan advises that development in an OA should be maximised (adopted plan) or optimised (RLP). Indeed, the PS Core Strategy recognises that the site has "considerable potential" and that its capacity may be in excess of stated figures (para 26.2.1). It is appropriate, therefore, and in the interests of a sustainable development solution, for the site allocation to refer to minimum figures.

- 3.10 The changes proposed to the site allocation text include references to the approximate minimum level of residential accommodation that could be delivered across the Earls Court Regeneration Area and in relation to the RBKC part of the site. These revised figures reflect the assessment work undertaken to date, as explained in the C&C Housing Studies (Evidence Base), reflecting the strategic nature of the site. Whilst the figures are approximate at this stage, the suggested minimum quota for RBKC sits comfortably within the density matrix in the London Plan and a lower minimum figure would not be justified or be sound in PPS12 terms.
- 3.11 Previous representations presented as part of the Strategic Sites DPD considered the headline capacity for the Earls Court Regeneration Area within RBKC to accommodate residential provision (see Housing Land Use Summary Study in the Evidence Base). These considered the direction of policy H9 of the UDP and within London Plan policy 3A.2 alongside the fact that boroughs are expected to investigate additional sources of housing capacity and identify further sites, applying higher densities where appropriate (LP paragraph 3A.10). The London Plan density provisions of policy 3A.3 and guidance figures of table 3A.2 suggest that on land in a Central area density levels of between 140 – 405 units/ha would be appropriate depending upon the average dwelling size. On the basis that the part of the Earls Court Regeneration Area land which lies within RBKC has a PTAL rating of 5 and is a highly accessible location the site was judged to be capable of accommodating at least 1500 homes subject to further design, master planning and assessment. In light of the inclusion of some 10,000 sq m of non residential uses within this area the anticipated site capacity has been appropriately modified to 1,000 homes within these representations.
- 3.12 The unit numbers will become more finely tuned through the Planning Framework and Masterplan process and as further assessment work is undertaken. It is clear, however, that, from the work undertaken to date, the site can make a much more significant contribution towards meeting the Borough's residential requirements in accordance with the PS Core Strategy vision than the minimum figure of 500 homes.

- 3.13 The delivery of around 10,000 new residential homes on the EC Regeneration Area is consistent with London Plan aspirations for boroughs to exceed targets and investigate additional sources of housing capacity, applying higher densities where appropriate. The Opportunity Area designation for Earls Court in the RLP reinforces the potential for significant housing development on the wider site. The quantum of new housing suggested in the OA (2,000 units) is recognised by the GLA as a conservative forecast and further analysis undertaken by C&C (being submitted with representations on the RLP) demonstrates that significantly higher levels of housing can be justified and will assist in meeting local need, as well as meeting strategic objectives for growth and housing delivery across the capital.
- 3.14 C&C wishes to have ongoing active engagement in relation to the housing evidence base, including Housing Trajectory (including SHLAA) and Housing Market Assessment discussions, Affordable Housing Target and Affordable Housing Threshold and Percentage methodology. C&C has identified its concerns in relation to the methodologies for the Borough SHMA and the viability assessment which should underpin the affordable housing policy approach. As the Earls Court Regeneration Area represents an important strategic opportunity for the borough C&C would welcome ongoing involvement in how the evidence base is developed and updated particularly as part of the Planning Framework discussions.
- 3.15 The revisions proposed to the site allocation text introduce clarity and flexibility which is essential for the Strategic Site to assist the Council in realising its vision and strategic objectives for the borough. They are also consistent with the PS Core Strategy vision, in particular to foster vitality (CO2) and the cultural use designation proposed on the Fostering Vitality Plan (page 170) and will help achieve an engaging public realm (CO4) and diversity of housing (CO6).

Town centre

- 3.16 The representations propose a town centre designation within the EC Regeneration Area. Whilst currently outside an existing town centre, the site is clearly identified for high density mixed use development in emerging strategic and local policy guidance. The proposed range of uses includes town centre functions (office, retail, leisure, hotel, cultural, destination facilities etc). The town centre function would be a consequence of this land use mix which is explained in more detail in the various land use studies in the Evidence Base. The Planning Framework and Masterplan will determine the spatial arrangement across the site based on new routes/ transport connections and the synergy between uses resulting in areas of focused activity synonymous with the Borough's aspirations for a vibrant world class new quarter of the city (para 10.2). This is explained in more detail in the Regeneration Area Framework and the Design Principles Study (Evidence Base).
- 3.17 The RBKC part of the site lies beyond 400m/ 5mins walk of existing local facilities and the PS Core Strategy proposes that redevelopment of the Strategic Site provides

the opportunity to meet this deficiency (para 30.3.10). The PS Core Strategy promotes new centres at Latimer and Kensal to address existing deficiencies (policy CF1) with the scale of development within the new centres reflecting the nature of proposed development in the wider area (para 31.3.5). There should be similar recognition that the EC Regeneration Area can supplement the existing network of centres. The Council acknowledges in responses to C&C's earlier representations that new development on the site will generate its own demand for retail facilities. Its response to C&C's earlier representations suggests that policy CF1 provides adequate scope to consider retail development on the Strategic Site. Whilst this policy accepts the principle of retail development outside designated locations where it would underpin the Council's regeneration objectives (subject to acceptable impacts on existing centres), the quantum and type of development envisaged in the EC Regeneration Area will manifest in a new town centre which will be needed to ensure a sustainable community. The RLP refers to development of a strategic scale in the Opportunity Area. It is appropriate and consistent in spatial planning for the future of the area for the Core Strategy to acknowledge this.

- 3.18 C&C's proposed approach would be consistent with national guidance advising local authorities to be positive and proactive in considering the need for new centres and to identify them, appropriate in scale, in areas of significant growth or where there are deficiencies (PPS6, draft PPS4). The RLP advises that town centres are a key spatial priority of the Plan, providing access to a range of services and enabling all parts of London to make a greater contribution to its economic success. They are key locations for a diverse range of activities, including retail, leisure and office space as well as housing, social infrastructure and public open space and key nodes for more effective land use and transport integration. The RLP promotes town centres as the main foci beyond the Central Activities Zone for commercial development and intensification including residential development where a sense of place and local identity can be provided. C&C will be making representations on the RLP to promote a town centre designation on the EC Regeneration Area. This is wholly consistent with the strategic and local development aspirations for EC Regeneration Area. It is an appropriate location for at least a new District Centre. If necessary, the Core Strategy should promote an early review following adoption of the RLP and the OAPF.
- 3.19 The precise location of the new town centre within the Regeneration Area will be determined through the Planning Framework and Masterplan process. New pedestrian and cycle routes will integrate the town centre within the Regeneration Area and, in turn, connect the new development with its surroundings. New facilities proposed within the site would, therefore, be convenient for existing residents in the area. The PS Core Strategy refers to local facilities within a short walking distance being an "essential characteristic" of life in the Borough and promotes measures to improve access for residents. Increasing access to local social and community facilities is a PS Core Strategy vision (CO1) and proposals for EC Regeneration Area will meet this objective.

- 3.20 This change is proposed to the places/ site specific text for the Strategic Site and the general policies where consequential changes are needed to be consistent.

One way system

- 3.21 The representations propose alternative, more appropriate, wording with respect to references to “unravel” the Earls Court one way system. C&C supports the desire to reduce the impact of existing traffic along Earls Court Road and to bring forward public realm and environmental improvements. The optimum way this can be achieved will depend on feasibility analysis/ testing and enlisting support from TfL as the responsible authority. TfL is currently undertaking a transport study for the area which will help to inform this process. It is clear from the GLA and TfL representations on Places and Sites (June 2009) that a proposal for two-way traffic is yet to be proven possible or even desirable. There also seemed very little support from the local community during public consultation.
- 3.22 The changes propose clarification to explain the objective for "improving" (rather than "unraveling") current arrangements and also refer to the need for assessments to be undertaken to help inform possible solutions. The revised drafting provides flexibility for a deliverable solution to come forward, without undermining the overall objective. In PPS12 terms, it is the most appropriate policy wording in terms of evidence base and flexibility. It recognises the importance of meeting Core Strategy visions for an engaging public realm, better travel choices and respect for environmental limits. Where necessary, C&C's revised wording has been fed in to other references in the document, to ensure consistency.
- 3.23 The Summary Transport Study which forms part of the evidence base explains that a transport strategy for the EC Regeneration Area will include a package of measures to promote sustainable travel choices, reduce the need to travel and reduce car dependency, in line with national, regional and local policy aims.

Townscape

- 3.24 The representations include some requested changes to the townscape and design related policies. In places, the DCS goes beyond the advice in national policy guidance. As a consequence, the approach is too prescriptive and could stifle opportunities for carefully conceived contemporary architecture. In addition, there needs to be greater recognition that large sites such as the EC Regeneration Area have the potential to introduce a variety of urban typologies, influenced by context, to complement existing townscape. It is important that such areas are also able to meet occupier requirements and achieve viable developments.

Contingencies and Risks Matrix

- 3.25 C&C has made representations on relevant parts of the matrix. Consequential changes reflecting changes elsewhere in the draft Core Strategy are required.

Other proposed changes

- 3.26 As already mentioned, consequential changes resulting from the above have been picked up throughout the PS document.
- 3.27 Representations are also being submitted with respect to some of the development management policies to assist in a sound document capable of realising the borough's vision and strategic objectives.

Sustainability appraisal

- 3.28 To assist in considering these representations, the changes proposed to particular policies have been assessed against the checklist in the Sustainability Appraisal and the ratings included in support of the proposed changes. This is explained in the schedule at **Appendix 6**.

4.0 DETAILED REPRESENTATIONS AND JUSTIFICATION

- 4.1 The table below sets out the detailed representations by C&C in relation to the text of the PS Core Strategy. Extracts from the Core Strategy are included, with changes to show the alterations being proposed – the text to be deleted has been struck through and the new text is underlined.

p10 Key Diagram	Legally compliant – N/A Sound – not effective Reasons See Key Themes Summary in C&C's submission document. There are a number of factors supporting a future town centre on the site: <ul style="list-style-type: none">- the strategic site allocation for Earls Court (with C&C's proposed changes) confirms the site as a suitable location for mixed use development cultural, leisure, hotel office and retail uses. These are all town centre uses in terms of PPS6 and draft PPS4- the strategy refers to the site being able to meet existing retail deficiencies in the area (para 3.3.10)- the Council in its response to C&C's earlier representations recognises that new development on the site will generate additional demand for
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	<p>town centre uses</p> <ul style="list-style-type: none"> - the Vision anticipates a cultural destination on the site - the Opportunity Area status of the site means it is a focus for high density mixed used development. The draft London Plan refers to the site having a strategic role - initial assessment work undertaken by C&C supports up to approx 720,000 sqm of town centre uses (office, retail, hotel, destination) on the Regeneration Area although the proposed quantum will be considered in greater detail as part of the ongoing assessment work including the transport study being carried out for the area and the forthcoming Planning Framework. <p>The location of a new centre within the Regeneration Area will be determined through the Masterplan process and it may potentially be concentrated more within the LBHF part of the Regeneration Area.</p> <p>The Council's response to C&C's earlier representations advises that designating a new centre would be premature and that a new centre could only be designated if the Council is satisfied it would not have a detrimental impact on existing centres. It also is concerned to avoid an indication that the Council is giving carte blanche for retail uses on the site.</p> <p>However, it is clear that in order to create a sustainable mixed use new community, a new town centre designation will be required. Reference to an "appropriate" centre together with the additional text in the proposed change makes it clear that the designation is subject to further assessment to ensure it is "appropriate". The Council in its response suggests that policy CF1 provides scope to permit out of centre retail development. However, the proposed designation is relevant as a Masterplan for the Regeneration Area will include town centre uses other than retail. The Council recognises that town centres are about more than just shopping, providing important places where people live, work and visit for leisure activities (para 31.3.21). This is reflected in the Strategic Site allocation and inherent in promoting new destination cultural facilities.</p>
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	<p>The proposed change will comply with the “town centre first” approach advocated in para 31.2.1 and advice in PPS6 that boroughs should adopt a positive and proactive approach to planning for the future of centres.</p> <p>The Earl’s Court Wider Site should be renamed as Earls Court Regeneration Area to be consistent with the terminology proposed by C&C in its representations to LBHF Core Strategy and the draft Replacement London Plan.</p> <p>The changes will provide clarity, making the strategy effective and sound.</p> <p>Changes sought Include notation on the Diagram referring to an "Appropriate New Centre" on the Earls Court Wider Site Re-name the Earls Court Wider Site as Earls Court Regeneration Area. See map extract at Appendix 3.</p>
<p>p11 Policy CV1 Vision for the Royal Borough: Building on Success</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons To reflect the vision for the Earls Court Regeneration Area, as explained in chapters 10 and 26.</p> <p>The Earls Court Regeneration Area is one of only 3 Opportunity Areas in the Borough and the second largest (albeit including land within LBHF). These are the areas where greatest change through urban regeneration is envisaged over the plan period. It is appropriate, therefore, to include a specific reference in policy CV1 as it is the overarching policy setting out the Council’s vision. It is important that the Executive Summary gives the reader a clear message about the direction of the Strategy. The proposed change ensures the text is consistent with references in chapters 10 and 26. It will enable the policy to be more effective and sound.</p>

	<p>Changes sought</p> <p>Policy CV1</p> <p>Our vision for Kensington and Chelsea over the next 20 years is to build on success. To further develop the strong and varied sense of place of the Borough, we will, in partnership with other organisations and importantly with our residents:</p> <ul style="list-style-type: none"> • stimulate regeneration in North Kensington through the provision of better transport, better housing and better facilities; • enhance the reputation of our national and international destinations – Knightsbridge, Portobello Road, South Kensington, the King’s Road, Kensington High Street, and Earl’s Court – by supporting and encouraging retail and cultural activities <u>and a new urban quarter as part of the Earls Court Regeneration Area</u> in particular; • uphold our residential quality of life so that we remain the best place in which to live in London, through cherishing quality in the built environment, acting on environmental issues and facilitating local living, including through strengthening local centres.
<p>p13, 14 What we will do to Enhance the Reputation of our National and International Destinations</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The proposed changes are needed to ensure the text is consistent with chapters 10 and 26, reflecting the potential for the site allocations to realise the strategic vision. The figure for new housing at Warwick Road is amended to be consistent with the allocation specified in para 10.4.2. The revisions make the policy effective and sound.</p> <p>Changes sought Page 13 Earl’s Court will offer an attractive 'urban-village' environment once <u>improvements are made to the one way system</u> is unraveled and stronger links will be created to the Earl's Court <u>Regeneration Area site</u></p>

	<p>which will remain an important exhibition or conference cultural venue that will be at least a destination, with <u>at least 1,000</u> 500 new homes in the Borough, and many more in neighbouring Hammersmith and Fulham. Over 4000 <u>1,700</u> more homes will be built at Warwick Road. Streetscape and pedestrian improvements to the Cromwell Road will transform the environment. We have allocated sites at Warwick Road and the Exhibition Centre to deliver these plans.</p> <p>Page 14 Specifically, by 2028:</p> <p>we will have fostered vitality:</p> <ul style="list-style-type: none"> • Earl’s Court will remain the location for <u>cultural/ destination uses or attractions</u> a large convention centre or exhibition function; • <u>Significant office development will have been developed in the Earls Court Regeneration Area</u> but small businesses will continue to be the backbone of the employment economy of the Borough;
<p>p36 Policy CV1 Vision for the Royal Borough: Building on Success</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons To reflect the vision for the Earls Court Regeneration Area, as explained in chapters 10 and 26.</p> <p>The Earls Court Regeneration Area is one of only 3 Opportunity Areas in the Borough and the second largest (including land within LBHF). These are the areas where greatest change through urban regeneration is envisaged over the plan period. It is appropriate, therefore, to include a specific reference in policy CV1 as it is the overarching policy setting out the Council’s vision. It is important that Executive Summary gives the reader a clear message about the direction of the Strategy. The proposed change ensures the text is consistent with references in chapters 10 and 26. It will enable the policy to be more effective and sound.</p> <p>Changes sought</p>

	<p>Policy CV1</p> <p>Our vision for Kensington and Chelsea over the next 20 years is to build on success. To further develop the strong and varied sense of place of the Borough, we will, in partnership with other organisations and importantly with our residents:</p> <ul style="list-style-type: none"> • stimulate regeneration in North Kensington through the provision of better transport, better housing and better facilities; • enhance the reputation of our national and international destinations – Knightsbridge, Portobello Road, South Kensington, the King’s Road, Kensington High Street, and Earl’s Court – by supporting and encouraging retail and cultural activities <u>and a new urban quarter as part of the Earls Court Regeneration Area</u> in particular; • uphold our residential quality of life so that we remain the best place in which to live in London, through cherishing quality in the built environment, acting on environmental issues and facilitating local living, including through strengthening local centres. <p>By 2028 regeneration in North Kensington will have resulted in significantly improved transport, with a new Crossrail station at Kensal, better links to Hammersmith and Fulham across the West London line and improved north-south bus links overcoming the generally lower levels of accessibility in the north. 2-3000 new homes will have been built, both private market and affordable, addressing the serious shortfall in housing need, and helping to diversify supply. It will be of a high quality design, well integrated into its context, overcoming some of the barriers to movement by which the North of the Borough is characterised. Better facilities will have been provided by the building of a new academy to serve the communities of North Kensington to address the serious shortage of secondary school places in the borough, helping to make life more local for residents. The deficiency in local shopping will have been addressed with two new town centres at Kensal and Latimer <u>and the Earls Court Regeneration Area</u>. The</p>
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	<p>unique character of Portobello Road will have flourished, including the antiques and street market, adding to the vitality of the area. Jobs will be readily available as the Employment Zones will have been protected from encroaching residential and be thriving centres for small businesses and the cultural industries sector. The north of the Borough will be at the heart of environmental sustainability with the combined heat and power network extending from the hubs at the major new developments at Kensal, Latimer and Wornington Green.</p> <p>In the Borough as a whole our reputation as a national and international destination will have been further enhanced. The Borough will have avoided becoming little more than a residential suburb, with a flourishing and rich variety of retail and cultural activities adding so much to the quality of life of the residents. Our top retail destinations of Knightsbridge, King’s Road, Kensington High Street and Portobello will have been maintained and enhanced. Opportunities to expand retail floorspace in Knightsbridge, King’s Road, Fulham Road and South Kensington will have been taken up. Earl’s Court will remain an important cultural destination, <u>as well as providing offices, hotel, commercial, leisure and retail floorspace</u> and around <u>2 2700</u> new dwellings <u>at Earls Court and</u> on surrounding sites. Exhibition Road in South Kensington will be providing a first class experience to visitors to the national institutions, and have set a new standard nationally of streetscape design. The Royal Marsden and Brompton hospitals will continue to further its international reputation for delivering world class health care, education and research activities.</p>
<p>P42 para 4.3.2 Broad Quanta of development</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C’s submission document. Changes are proposed to reflect the minimum quantum of housing appropriate for the Earls Court Strategic Site allocation (1,000 units), meaning the overall</p>

	<p>strategic figure should increase to 5,500. The change reflects C&C's representations to chapters 10 and 26 and provides consistency across the document and effectiveness of the Core Strategy to meet its vision to diversify housing.</p> <p>Changes sought 4.3.2 The Borough has to provide a minimum of 3,500 homes between 2007/8 and 2016/7 - or 350 units a year. This housing target is set out in the London Plan. The revised London Plan, issued for public consultation in October 2009, raises this figure to 585. This is not yet an agreed target, and will not be until the the Examination in Public into the revised London Plan has concluded. The Borough is therefore planning for 600 units a year to allow for some flexibility from 2011/12, the estimated date of adoption of the revised London Plan⁽¹⁴⁾, for a 10 year period. This increase can be accommodated because of significant redevelopment sites. Two sites, Kensal and Earl's Court, are designated as Opportunity Areas in the revised London Plan. Earl's Court also includes land in the London Borough of Hammersmith and Fulham. The proposed housing provision on the strategic sites in this Borough allocated in this plan is over 5,500 dwellings.</p>
<p>p42 para 4.3.6 broad quanta of development</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C's submission document.</p> <p>Changes sought 4.3.6 The Retail Needs Assessment identifies a need for just over 25,000m² (269,000 ft²) (gross) of comparison retail floorspace to 2015 for the south of the Borough. Very little of this is forecast to be required in the centre and north of the Borough. A proportion of this would be accommodated by making better use of existing premises and sites and filling vacant units. In terms of new sites, there are no large sites for retail development identified in the plan that could be regarded as 'strategic' <u>although new retail</u></p>

	<p><u>development and other town centre and destination uses are proposed as part of redevelopment within the wider Earls Court Regeneration Area. . Whilst it is thus not appropriate for specific retail sites them to be allocated in the Core Strategy, the Earls Court Regeneration Area is recognised as suitable for an appropriate town centre. However, I In Knightsbridge, South Kensington, Brompton Cross and the King's Road a number of smaller sites have been identified (not allocated) with the potential for ground floor retail in the <i>Place Profiles</i> (see below). In total, the combined site area amounts to about 21,000m² (210,000 ft²). It is therefore envisaged that the identified demand can be accommodated within or immediately adjacent to existing centres <u>and within the Earls Court Regeneration Area.</u></u></p>
<p>p43 Policy CP1 Core Policy: Quanta of development</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C's submission document.</p> <p>The proposed changes are required to reflect the development potential of the Earls Court Strategic Site and the wider Earls Court Regeneration Area, having regard to its Opportunity Area status in the Replacement London Plan and the mix of uses envisaged on the site elsewhere in the PS Core Strategy and the RLP. The PS Core Strategy recognises that the Strategic Site has considerable potential and capacity which will be in excess of the current allocations. Analysis presented in the Evidence Base accompanying C&C's representations support a Land Use Budget of up to 1,640,000 sqm across the EC Regeneration Area. Further refinement of the quantum and mix of uses on the site will be informed by the GLA's transport capacity study and other assessments and through a Planning Framework and Masterplan process.</p> <p>In relation to office floorspace, the 10,000m² of allocation should be flexible to incorporate a wider range of non-residential uses, including <u>potential commercial, office, retail and leisure uses – a change is</u></p>

	<p><u>sought in this regard, as is set out below.</u></p> <p>The proposed changes are consistent with C&C’s representations to chapters 10 and 26 and achieve an effective policy basis for the Core Strategy to deliver its vision.</p> <p>Changes sought</p> <p>Policy CP1</p> <p>The Council will provide:</p> <p>(1) 350 additional new homes a year until the London Plan is reviewed, and <u>a minimum of 600</u> a year (of which 200 will be affordable) thereafter for a 10 year period;</p> <p>(2) <u>up to 69,200m²</u> of office floorspace to 2028;</p> <p>(3) <u>26,150m²</u> of comparison retail floorspace to 2015 in the south of the Borough <u>and additional retail development as part of the Earls Court Regeneration Area;</u></p> <p>(4) Infrastructure as set out in the infrastructure plan, including through developer contributions.</p> <p>To deliver this the Council has, in this document:</p> <p>(a) allocated strategic sites with the capacity for a minimum of <u>53-800</u> dwellings;</p> <p>(b) allocated in the strategic sites of Kensal and Earls Court a minimum of <u>2 10,000m²</u> business floorspace to meet identified unmet demand above the existing permissions;</p> <p>(c) <u>allocate a minimum of 10,000sqm of non residential floorspace for potential commercial, office, retail and leisure uses and a new urban quarter as part of the Earls Court Regeneration Area;</u></p> <p>(d) identified in the south of the Borough sufficient small sites with the potential for retail development to demonstrate identified retail needs of the borough can be met;</p> <p>(e) set out current infrastructure requirements, to be updated as part of the regular infrastructure plan review process.</p>
<p>p44 Quantum of Development diagram</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p>

	<p>Reasons See Key Themes Summary in C&C’s submission document.</p> <p>The supporting text should acknowledge that town centre uses are proposed in the Earls Court Regeneration Area. The strategic site policy (with C&C’s proposed changes) confirms the site as a suitable location for cultural, leisure, hotel office and retail uses. There are a number of factors supporting a future town centre on the site:</p> <ul style="list-style-type: none"> - the strategy refers to the site being able to meet existing retail deficiencies in the area (para 3.3.10) - the Council in its response to C&C’s earlier representations recognises that new development on the site will generate additional demand for town centre uses - the Vision anticipates an cultural destination on the site - the Opportunity Area status of the site means it is a focus for high density mixed used development. The draft London Plan refers to the site having a strategic role - initial assessment work undertaken by C&C supports approx 720,000 sqm of town centre uses (office, retail, hotel, destination) on the Regeneration Area although the proposed quantum will be considered in greater detail as part of the transport study being carried out for the area and the forthcoming Planning Framework <p>The location of a new centre within the Regeneration Area will be determined through the Masterplan process and it may potentially be concentrated more within the LBHF part of the Regeneration Area.</p> <p>The Council’s response to C&C’s earlier representations advises that designating a new centre would be premature and that a new centre could only be designated if the Council is satisfied it would not have a detrimental impact on existing centres. It also is concerned to avoid an indication that the Council is giving carte blanche for retail uses on the site.</p> <p>Reference to an “appropriate” centre together with the additional text in the proposed change makes it clear</p>
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	<p>that the designation is subject to further assessment. The Council in its response suggests that policy CF1 provides scope to permit out of centre retail development. However, the proposed designation is relevant as a Masterplan for the Regeneration Area will also include town centre uses other than retail. The Council recognises that town centres are about more than just shopping providing important places where people live, work and visit for leisure activities (para 31.3.21). This is reflected in the Strategic Site allocation and inherent in promoting new cultural destination facilities.</p> <p>The proposed change will comply with the “town centre first” approach advocated in para 31.2.1 and advice in PPS6 that boroughs should adopt a positive and proactive approach to planning for the future of centres. The change will provide clarity, making the strategy effective and sound.</p> <p>Changes sought Add "Appropriate New Centre" notation on the Earls Court Regeneration Area. See map extract at Appendix 3.</p>
<p>p 80 Chapter 10 Earls Court</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not justified</p> <p>Reasons 10.1.1 and 10.1.3 The proposed change clarifies that the text refers to the locality within RBKC to be accurate and avoid possible confusion with the Earls Court exhibition centre site itself or Earls Court as a town centre or the wider Earls Court Regeneration Area within LBHF.</p> <p>10.1.2 The proposed change reflects the possibility of a changed status for the existing Earls Court town centre. The probability of a reclassification is not known; the RLP continues to designate it as a District Centre.</p> <p>Reference to the one way system impacting upon the centre is a more accurate reflection of the effects of the current arrangement. Whilst the road system</p>

	<p>segregates the centre and adversely impacts on the environment, there are strong pedestrian links across road system. “Shattered” is in any event, overly emotive language in this context.</p> <p>10.1.6 The proposed change adds recognition that access and servicing arrangements for the Exhibition Centre complex will need continued support until redevelopment occurs, and improvements to alter in the future to serve the day to day operational needs of the existing business.</p> <p>10.2 The proposed changes reflect the changes sought to the Vision for the area, as explained in the Key Themes Summary in the main submission. These include:</p> <ul style="list-style-type: none">- seeking improvements to the one way system (rather than necessarily “unravelling”) as scope to change the existing arrangements, associated works and their feasibility have yet to be assessed and tested- clarification that redevelopment of the Exhibition Centre is likely to be considered as part of the wider Earls Court Regeneration Area scheme or vision. The proposed range of uses confirms that a scheme would involve residential and non residential uses. Reference to a convention or exhibition centre on redevelopment of the site is deleted as such a facility is no long being actively pursued at this time. The text confirms that a significant destination use should be provided on redevelopment instead. It also refers to the potential for a new town centre within the EC Regeneration Area <p>10.3.2 The proposed changes reflect more accurately the context for assessing improvements to the one way system and necessary provisos having regard to the information currently available, as explained in the Key Themes Summary in C&C’s submission document.</p> <p>10.3.6 The proposed change clarifies the importance of the townscape heritage issues in considering new</p>
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	<p>development in the area. Reference to “crucial” implies the success of Earls Court as an area is dependent on these heritage considerations. Impacts on listed buildings and conservation areas will be given relevant weight by other policies in the Core Strategy and under PPG15 guidance. However, this will be one of a range of material considerations, of varying importance, that development proposals would need to address and will depend on the specific circumstances of the site and scheme.</p> <p>10.3.7 The text clarifies the legacy for the area will be underpinned by development proposals across the wider Regeneration Area and that the existing Earls Court Road centre is a district centre in the hierarchy.</p> <p>10.3.8 Reference to a convention centre within the Earls Court or Olympia complexes is deleted as such a facility is no longer being actively pursued at this time. The text confirms that a significant destination use should be provided on the wider Earls Court Regeneration Area instead, reflecting the draw of the site at present</p> <p>10.3.11 The proposed change recognises the potential for a new town centre designation within the wider Earls Court Regeneration Area, reflecting the range and scale of land uses proposed across the site and its status as an Opportunity Area in the RLP.</p> <p>10.3.12 The proposed change seeks a more diverse housing tenure creating a sustainable balanced community with flexibility required (not unduly constrained by existing tenure mix). The changes clarify the amount of residential development that can be supported across the wider Earls Court Regeneration Area, based on the evidence base presented by C&C and reflecting London Plan densities and public transport accessibility. It is recognised that these figures will be refined as a result of analysis feeding in to the Planning Framework (OAPF) and a subsequent Masterplan but the potential capacity of the wider Earls Court</p>
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	<p>Regeneration Area is established and should be reflected.</p> <p>10.3.15 The proposed changes reflect a deliverable goal for the one way system whilst acknowledging that further feasibility work is required. Reference is introduced seeking Council support for the assessment of initiatives which is important as RBKC is a stakeholder with a role enabling transport and public realm improvements</p> <p>10.3.16 A consistent use of “wider Earls Court Regeneration Area” is required for clarity.</p> <p>10.4.2 The proposed changes reflect the quantum of development and mix of uses that could be achieved across the RBKC part of the wider Earls Court Regeneration Area and the wider EC regeneration Area itself, based on the C&C evidence base, London Plan densities and public transport accessibility. It clarifies that these figures will be subject to capacity testing through the Planning Framework OAPF and a subsequent masterplan. The proposed changes distinguish between development proposed within the RBKC part of the site and what is envisaged for the Regeneration Area as a whole.</p> <p>10.4.3 “Improvements” rather than “unravelling” will accurately reflect a deliverable objective.</p> <p>10.4.4 The proposed changes take in to account the way forward agreed with GLA and the 2 boroughs ie that an OAPF is produced for the wider Earls Court Regeneration Area, prepared by the GLA jointly with the authorities and landowners, in line with the recommended approach set out in the London Plan. The Planning Framework will help inform the disposition of uses across the Regeneration Area and quantum of floorspace, providing additional guidance within which planning applications can be put together to deliver the vision. The Planning Framework and</p>
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	<p>masterplanning process will also determine potential for the new hub to provide the focus for a town centre designation. The Core Strategy should acknowledge the full scope of development that could come forward in the Regeneration Area to allow for change and provide a robust policy document within which planning applications can be determined.</p> <p>10.4.6 Alterations are proposed to the output indicators to include:</p> <ul style="list-style-type: none"> - the contribution the site makes to meeting housing targets, being one of the Strategic Objectives - potential improvements to the one way system to reflect a deliverable output - clarification of the destination use proposed for the Earls Court strategic site - reference to connections to a district energy source for new development to provide flexibility for future sustainable heat and energy solutions. Reference to “the” district energy source is deleted as there may be a series of smaller sources (eg small scale CHPs) and the provision may also be phased. <p>Changes sought See text mark up in Appendix 4.</p>
<p>p152 Chapter 26 Strategic Sites, Policy CA7 - Earls Court</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not justified</p> <p>Reasons 26.1.2 The proposed change seeks to provide no preference to the list of priorities. Due to the nature of the development opportunity on the strategic site and the wider Earls Court Regeneration Area all the Strategic Objectives will be important and relevant. It is preferable to allow some flexibility for development proposals to respond to the Objectives on a more holistic basis, taking in to account opportunities presented by the wider Regeneration Site. This will serve the interests in achieving a sustainable Masterplan. The evidence base for the currently listed priority order is not sound.</p>

	<p>26.1.3 Additional text is proposed to reinforce the strategic importance of the Earls Court Regeneration Area, as a location to deliver urban renewal through high density mixed use development, in accordance with the Replacement London Plan</p> <p>26.2.1 The proposed changes take in to account the way forward agreed with GLA and the 2 boroughs ie that an OAPF is produced for the wider Earls Court Regeneration Area prepared by the GLA jointly with the local authorities and landowners, in line with the recommended approach set out in the London Plan. The Planning Framework will help inform the disposition of uses across the site and quantum of floorspace, providing additional guidance within which planning applications can be put together to deliver the vision. The Planning Framework and masterplanning process will also determine potential for the hub to provide the focus for a town centre designation. The Core Strategy should acknowledge the full scope of development that could come forward in the Regeneration Area to allow for change and provide a robust policy document within which planning applications can be determined.</p> <p>26.2.2 The proposed change clarifies that meeting day to day needs will be one function of the retail accommodation provided on redevelopment. It will also, for example, serve those visiting the cultural destination facility and meet demand generated from other uses proposed within a comprehensive scheme.</p> <p>26.2.3 The proposed change introduces clarity,</p> <ul style="list-style-type: none">- to take account of ongoing operational requirements of the existing Exhibition Centre business. The Core Strategy recognises the importance of the existing exhibition centre and it is relevant for the document to acknowledge that this will be supported until redevelopment occurs.
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	<p>This is consistent with current Local Plan policy;</p> <ul style="list-style-type: none"> - that redevelopment of the Exhibition Centre is likely to be considered as part of the wider Earls Court Regeneration Area. The proposed range of uses confirms that a scheme would involve residential and non residential uses. Reference to a convention or exhibition centre on redevelopment of the site is deleted as such a facility is no longer being actively pursued at this time. The text confirms that a significant destination use should be provided on redevelopment instead - in relation to the way forward agreed with GLA and the 2 boroughs ie that an OAPF is produced for the Regeneration Area, prepared by the GLA jointly with the local authorities and landowners, in line with the recommended approach set out in the London Plan. The Planning Framework will help inform the disposition of uses across the site and quantum of floorspace, providing additional guidance within which planning applications can be put together to deliver the vision for the site. <p>26.2.4 The proposed changes reflect more accurately the context for assessing improvements to the one way system and necessary provisos having regard to the information currently available, as explained in the Key Themes Summary in C&C's submission document.</p> <p>26.2.8 The changes reflect the approach in the London Plan when considering development in Opportunity Areas. It is important to avoid unnecessary prescription so that an appropriate masterplan can evolve. Other policies in the Core Strategy explain how development proposals should address density and townscape context. The current wording is unduly negative.</p> <p>26.2.9 The proposed changes clarify the requirements for a waste management strategy. The most effective and efficient solution will depend on development and phasing proposed across the Earls Court Regeneration</p>
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	<p>Area.</p> <p>26.2.10 The changes include reference to connections to a district energy source for new development to provide flexibility for future sustainable heat and energy solutions.</p> <p>26.2.11 Opportunities to enhance biodiversity are likely to stem from a strategy for the wider Regeneration Area, informed by the Planning Framework, rather than just the RBKC part of the Regeneration Area. Local biodiversity enhancement is a deliverable policy objective to help to contribute to overall provision.</p> <p>Policy CA7 Changes are proposed to ensure consistency with C&C's representations to other parts of the document. The text is importantly amended to clarify elements that relate purely to Earls Court as a strategic site within RBKC Core Strategy and those relating to the wider Earls Court Regeneration Area. In particular:</p> <ul style="list-style-type: none"> - regarding (a) and (b) (as amended) these relate solely to RBKC part of the EC Regeneration Area, ie the allocation, with a quantum and mix of uses reflects the strategic role of the site as part of an Opportunity Area in the Replacement London Plan, as explained in the Key Themes Summary in C&C's submission document - (c), (d) and (e) (as amended) relate to the wider Earls Court Regeneration Area and where on the wider Earls Court Regeneration Area they are precisely provided is subject to further masterplanning. (c), (d) and (e) (as amended) are therefore set out as land uses which the RBKC wishes to see incorporated in to the wider EC Regeneration Area as a whole. The proposed range of uses confirms that a scheme would involve residential and non residential uses. Reference to a convention or exhibition centre on redevelopment of the site is deleted as such a facility is no longer being actively. The text confirms that a significant destination use should be provided within the wider Earls Court
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	<p>Regeneration Area instead. In relation to (d) and (e) the changes seek to make the policy less prescriptive so that objectives for sustainable waste and energy solutions can be realistically achieved</p> <ul style="list-style-type: none"> - in relation to (f), (g) and (h) (as amended), these are set out as key design principles to apply to either the wider Earls Court Regeneration Area or just the RBKC part of the EC Regeneration Area as applicable, subject to masterplanning. The proposed changes reflect more accurately the context for assessing improvements to the one way system and necessary provisos having regard to the information currently available, as explained in the Key Themes Summary in C&C's submission document. - in relation to (i) to (p) inclusive (as amended), these are set out as infrastructure and planning obligations to apply to either the wider Earls Court regeneration Area or just the RBKC part of the EC Regeneration Area as applicable, subject to masterplanning. Clarification is inserted that requirements for development related obligations will be covered by the Planning Framework Document (OAPF) for the EC Regeneration Area, as well as being informed by the Council's forthcoming Developer Obligations . <p>26.3.1 The proposed changes reflect C&C's representations to the Risks matrix.</p> <p>A scheme not involving as many cultural or destination uses could be implemented if that was the only way of achieving regeneration. However, it is clear that the current Earls Court owners have every intention of building on the Earls Court brand, so this is considered to be a "medium" risk.</p> <p>The deliverability of changes to the Earls Court One-Way system should be regarded a medium risk as does not C&C's proposed change to the policy allows for appropriate flexibility in relation to Earls Court One-Way system "improvements". In reality what can feasibly and viably be done to improve the One-Way</p>
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	<p>system should be done.</p> <p>26.3.2 The proposed changes take in to account the way forward agreed with GLA and the 2 boroughs ie that an OAPF is produced for the site, prepared by the GLA jointly with the local authorities in collaboration with the landowners, in line with the recommended approach set out in the London Plan. The Planning Framework will help inform the disposition of uses across the site and quantum of floorspace, providing additional guidance within which planning applications can be put together to deliver the vision for the site.</p> <p>26.3.4 The changes clarify the delivery milestones to ensure consistency with changes proposed to the rest of the chapter.</p> <p>26.4.4 The proposed change includes TfL as a site owner (freeholder of the Exhibition Centre site).</p> <p>Changes sought See text mark up in Appendix 5.</p>
<p>p158 – para 28.1.3</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The site boundary for Earls Court Strategic Site needs to be amended to reflect the boundary of the EC Regeneration Area within RBKC. The proper integration of the parcel of land currently outside of the boundary shown is required to ensure a satisfactory setting for the site.</p> <p>Changes sought Amend site boundary for Earls Court Strategic site See map extract in Appendix 3.</p>
<p>p161 para 29.2.4 and Policy C1 Infrastructure delivery and planning obligations</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p>

	<p>Reasons</p> <ul style="list-style-type: none"> - The policy and supporting text require clarification to ensure that the range of measures that may be secured through s106 are tailored to the circumstances of a development proposal and its expected impacts. - In considering potential planning obligations it will be relevant to have regard to the planning benefits of a scheme and the extent to which imposition of planning obligations may have the undesired consequence of curtailing opportunities for other potential benefits to be realised - Viability issues will have a bearing on a range of types of planning obligations, in addition to section 106 contributions. - These changes will provide appropriate flexibility for development proposals to realise the Vision making the policy effective and sound. <p>Changes sought</p> <p>29.2.4 Planning Obligations are intended to make acceptable development which would otherwise be unacceptable in planning terms. They might be used to prescribe the nature of a development; to secure a contribution from a developer to compensate for loss or damage created by a development; or to mitigate a development's impact. Such measures may <u>(as appropriate and applicable to the relevant proposals)</u> include.....</p> <p>Policy C1</p> <p>New development will be coordinated with the provision of appropriate infrastructure to support the development. The Council will require that there is adequate infrastructure to serve developments, including through the use of planning obligations, working with infrastructure providers and stakeholders to identify requirements.</p> <p>In determining applications for planning permission, the Council will take into consideration the nature, scale and location of the proposed development, and where the need arises from the development either because of its individual or cumulative impact, will seek prescriptive, compensatory or mitigatory measures to secure the necessary social, physical, green or</p>
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	<p>environmental infrastructure, or improvements to the proposals submitted to enable the development to proceed, in accordance with advice in national guidance.</p> <p><i>Planning Obligations</i> Planning obligations will be negotiated taking account of the proposed development, <u>having regard to the benefits generated by the development</u> and in determining which measure receives priority, account will be taken of the individual characteristics of the site, the infrastructure needs of the site and the surrounding area, and the London Plan. Proposals that form part of potentially wider sites will be assessed in terms of the capacity of the site as a whole.</p> <p>The viability of the development will also be taken into account. In the case of an enabling development, or where the development is unable to deliver all the policy requirements for reasons of viability, a viability study will be required to accompany the planning application. s106 contributions <u>and related obligations and commitments</u> will be reviewed in the context of this viability study. The viability study should use the GLA toolkit or an agreed alternative. The applicant will fund the independent assessment of the viability study, or other technical studies requiring independent assessment, prior to the application being determined.</p>
<p>p164 Keeping Life Local</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The text acknowledges that existing deficiencies in local shopping facilities in the Earls Court area are expected to be addressed through redevelopment of the EC Regeneration Area (30.3.10). The Council’s response to earlier representations state that the proposed change is unnecessary and repetitive as the wider area is indicated elsewhere in the document.</p> <p>However, the location of retail facilities on the site will be determined through the Masterplan process and may be on land within LBHF. Denoting the wider EC Regeneration Site (as illustrated on the Key Diagram)</p>

	<p>will clarify the position for the reader and provide consistence across the document making it effective.</p> <p>Changes sought Add brown shading across land within LBHF to denote the Earls Court Regeneration Area “wider site”, as illustrated on the Key Diagram. See map extract at Appendix 3.</p>
<p>p168 Corporate or partnership actions for keeping life local</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The text refers to existing deficiencies in local shopping facilities in the Earls Court area as being addressed through redevelopment of the Earls Court strategic site (30.3.10). This development opportunity will come forward as part of the Earls Court Regeneration Area, in conjunction with LBHF and the GLA. Whilst this approach is explained elsewhere in the document, it is relevant to include a specific corporate action as the development opportunity will help meet the strategic objective for keeping life local. The proposed change explains the deliverability of this benefit, making the document effective and sound.</p> <p>Changes sought Add a new bullet point: <u>15 The Directorate of Planning and Borough Development will work with LBHF and the GLA to prepare a Supplementary Planning Document to bring forward redevelopment of the Earls Court Regeneration Area</u></p>
<p>p169 Fostering Vitality</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C’s submission document.</p> <p>The supporting text should acknowledge that town centre uses are proposed in the Earls Court Regeneration Area. The strategic site policy (with</p>

	<p>C&C proposed changes) confirms the site as a suitable location for cultural, leisure, hotel office and retail uses. There are a number of factors supporting a future town centre on the site:</p> <ul style="list-style-type: none">- the strategy refers to the site being able to meet existing retail deficiencies in the area (para 3.3.10)- the Council in its response to C&C's earlier representations recognises that new development on the site will generate additional demand for town centre uses- the Vision anticipates a cultural destination on the site- the Opportunity Area status of the site means it is a focus for high density mixed used development. The draft London Plan refers to the site having a strategic role- initial assessment work undertaken by C&C supports approx 720,000 sqm of town centre uses (office, retail, hotel, destination) on the Regeneration Area although the proposed quantum will be considered in greater detail as part of further assessment including the transport study being carried out for the area and the forthcoming Planning Framework <p>The location of a new centre within the Regeneration Area will be determined through the Masterplan process and it may potentially be concentrated more within the LBHF part of the Regeneration Area.</p> <p>The Council's response to C&C's earlier representations advises that designating a new centre would be premature and that a new centre could only be designated if the Council is satisfied it would not have a detrimental impact on existing centres. It also is concerned to avoid an indication that the Council is giving carte blanche for retail uses on the site.</p> <p>Reference to an "appropriate" centre together with the additional text in the proposed change makes it clear that the designation needs to be appropriate and is subject to further assessment. The Council in its response suggests that policy CF1 provides scope to permit out of centre retail development. However, the proposed designation is relevant as a Masterplan for the Regeneration Area will also include town centre uses</p>
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	<p>other than retail. The Council recognises that town centres are about more than just shopping providing important places where people live, work and visit for leisure activities (para 31.3.21). This is reflected in the Strategic Site allocation and inherent in promoting new cultural facilities that comprise a destination.</p> <p>The proposed change will comply with the “town centre first” approach advocated in para 31.2.1 and advice in PPS6 that boroughs should adopt a positive and proactive approach to planning for the future of centres. C&C’s representations to the RLP will also seek recognition for a town centre designation on the Earls Court Regeneration Area The change will provide clarity, making the strategy effective and sound.</p> <p>Changes sought Add a new paragraph after 31.2.2 <u>New town centre uses to include commercial, office, retail, leisure and hotel and a cultural/ destination use or attractions of a destination scale are proposed at the Earls Court Strategic Site as part of a new urban quarter on the Earls Court Regeneration Area which includes land within LBHF. These facilities together with significant levels of residential development will establish an appropriate new town centre within the Regeneration Area, although its location within the Regeneration Area will be determined through a Planning Framework and Masterplan process. Following the adoption of the Planning Framework, an early review of the Core Strategy policy in this respect can be undertaken as required.</u></p>
<p>p170 Fostering Vitality diagram</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C’s submission document and representations to page 169 – Fostering Vitality.</p> <p>Changes sought Add "Appropriate New Centre" notation on the Earls Court Regeneration Area and extend the Concentration</p>

	<p>of Cultural Uses notation across the wider site. See map extract at Appendix 4.</p>
<p>p171 Policy CF1 Location of new shop uses</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C’s submission document.</p> <p>The supporting text should acknowledge that town centre uses are proposed in the Earls Court Regeneration Area. The strategic site policy (with C&C proposed changes) confirms the site as a suitable location for cultural, leisure, hotel office and retail uses. There are a number of factors supporting a future town centre on the site:</p> <ul style="list-style-type: none"> - the strategy refers to the site being able to meet existing retail deficiencies in the area (para 3.3.10) - the Council in its response to C&C’s earlier representations recognises that new development on the site will generate additional demand for town centre uses - the Vision anticipates a cultural destination on the site - the Opportunity Area status of the site means it is a focus for high density mixed used development. The draft London Plan refers to the site having a strategic role - initial assessment work undertaken by C&C supports approx 720,000 sqm of town centre uses (office, retail, hotel, destination) on the Regeneration Area although the proposed quantum will be considered in greater detail as part of the forthcoming Planning Framework <p>The location of a new centre within the Regeneration Area will be determined through the Masterplan process and it may potentially be concentrated more within the LBHF part of the Regeneration Area.</p> <p>The Council’s response to C&C’s earlier representations advises that designating a new centre would be premature and that a new centre could only be designated if the Council is satisfied it would not</p>

	<p>have a detrimental impact on existing centres. It also is concerned to avoid an indication that the Council is giving carte blanche for retail uses on the site.</p> <p>Reference to an “Appropriate” centre together with the additional text in the proposed change makes it clear that the designation needs to be appropriate and is subject to further assessment. The Council in its response suggests that policy CF1 provides scope to permit out of centre retail development. However, the proposed designation is relevant as a Masterplan for the Regeneration Area will also include town centre uses other than retail. The Council recognises that town centres are about more than just shopping, providing important places where people live, work and visit for leisure activities (para 31.3.21). This is reflected in the strategic site allocation and inherent in promoting new cultural facilities that comprise a destination.</p> <p>The proposed change will comply with the “town centre first” approach advocated in para 31.2.1 and advice in PPS6 that boroughs should adopt a positive and proactive approach to planning for the future of centres. The change will provide clarity, making the strategy effective and sound</p> <p>Changes sought</p> <p>The Council will ensure vital and viable town centres through a town centre first approach to new retail floorspace.</p> <p>To deliver this the Council will:</p> <ul style="list-style-type: none">(a) support the creation of new shop floorspace within town centres;(b) require new retail development with a floor area of 400 m² (4,300 ft²) (gross external) or more to be located within existing higher order town centres or within sites adjoining Knightsbridge, King’s Road (East and West), Fulham Road, Brompton Cross and South Kensington where no suitable sites can be identified within these centres;
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	<p>(c) permit new shops (A1) of less than 400 m² (4,300 ft²)(gross external) in areas of retail deficiency as shown on the plan within Chapter 30 (<i>Keeping Life Local</i>) ;</p> <p>(d) require the establishment of new centres in the <u>Latimer and Kensal areas</u> and the <u>Earls Court Regeneration Area</u> to address identified retail deficiency;</p> <p>(e) require, where proposals for new retail development do not comply with parts (a) to (d), that it is demonstrated either:</p> <ul style="list-style-type: none"> i. the need for the proposal; and that the development would meet the requirements of the sequential test; and that the development will not have an unacceptable impact on existing centres; or ii. that the new floorspace would underpin the Council’s regeneration objectives and the vitality of any existing centre will not be harmed.
<p>p174 Policy CF2 – neighbourhood shops</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons Changes are proposed to have regard to other planning objectives and benefits that development proposals qualifying under para (c) may deliver and also to take in to account impacts on viability. The proposed change provides some flexibility for the policy to be applied effectively.</p> <p>Changes sought Policy CF2 The Council will promote vital and viable town centres and ensure that the character and diversity of the Borough's town centres is maintained.</p> <p>To deliver this the Council will: (a) require the scale and nature of development</p>

	<p>within a town centre to reflect the position of the centre within the retail hierarchy and to assist in the implementation of the vision for that centre as set out within Section 1b <i>Places</i> (Chapters 4-18);</p> <p>(b) require a range of shop units sizes in new major retail development, and resist the amalgamation of shop units, where the retention of the existing units contributes to achieving the vision for the centre;</p> <p>(c) require new large scale retail development or mixed use development with a significant retail element, to provide affordable shops to be managed under the Council’s Neighbourhood Shopping Policy. Affordable shops can be provided off site within the same centre where appropriate. <u>In applying this part of the policy the Council will have regard to viability and wider planning benefits to be realised by the development including meeting strategic regeneration objectives.</u></p>
<p>p176 para 31.3.31</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The current drafting infers that most demand for office floorspace comes from small requirements, whereas requirements for larger units will constitute a greater part of the office supply. The changes provide additional clarity, reflecting demand for large units as well as smaller premises, thus making the policy more effective.</p> <p>Changes sought 31.3.31 There is a forecast demand for 15% growth of office jobs over the plan period. This equates to a net addition of 69,200 m² (750,000 ft²) of office floorspace. For industry and warehousing, the forecast is for a small reduction of required stock of just 4,500 m² (50,000 ft²) or just 180 jobs. The types of units sought does vary. For light industrial uses, most take up is in units to about 230 m² (2,500 ft²), whereas for offices, most take up is for units between 45 m² and 75 m² (500 ft² and 800 ft²). This is not to say that t <u>There</u></p>

	<p>is no <u>also</u> demand for larger units within the Borough as evidenced by the recent building out of some large scale office developments indicates that there is. <u>A range of size of sites will be needed, therefore, to meet future demand requirements.</u></p>
<p>p176 para 31.3.32</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C’s submission document.</p> <p>The proposed change reflects the site allocation for the Earls Court Strategic Site, as modified by C&C’s representations. The site designation includes 10,000sqm of non residential floorspace to comprise offices, amongst other uses.</p> <p>Changes sought 31.3.32 On the supply side, office floorspace under construction and outstanding permissions provide a net addition of 46,000m² (500,000 ft²)⁽²⁸¹⁾. This level of building will meet office demand until 2017. The Council therefore recognises that a further 23,000 m² of office floorspace needs to be developed within the Borough, within the plan period for the predicted need to be met. The Council has allocated 2 <u>10,000m²</u> (108,000 ft²) of business floor space within the Strategic Site Allocations for the Earls Court and the Kensal Gasworks sites. <u>A minimum of 10,000 sqm of further commercial floorspace which may include office development is allocated on the Earls Court Strategic Site.</u> Any remaining need would be likely to be met by other smaller windfall sites, particularly by very small and small office developments across the Borough.</p>
<p>p178 Policy CF5 Location of business uses</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons Additional text is proposed to refer to the acceptability of office development on the Earls Court and Kensal</p>

	<p>Gasworks strategic sites, as stated in para 31.3.32. Added flexibility is proposed in (f) (formerly (e)) to take account of other factors that will have a bearing on the nature and type of business space appropriate in a particular development scheme. The alteration provides clarity and consistency for an effective policy.</p> <p>Changes sought Policy CF5 The Council will ensure that there are a range of business premises within the Borough to allow businesses to grow and thrive; to consolidate large and medium offices within town centres and areas of high transport accessibility; and protect and promote employment zones for a range of small and medium business activities which directly support the function and character of the zone.</p> <p>To deliver this the Council will, with regard to:</p> <p><i>Offices</i></p> <ul style="list-style-type: none">(a) protect very small and small offices (when either stand alone or as part of a larger business premises) throughout the Borough; medium sized offices within the Employment Zones, Higher Order Town Centres, other accessible areas and primarily commercial mews; large offices in Higher Order Town Centres and other accessible areas, except where:<ul style="list-style-type: none">(i) the office is within an employment zone and is being replaced by a light industrial use, workshop or other use which directly supports the character and function of the zone;(ii) the office is within a town centre and is being replaced by a shop or shop floorspace;(b) permit very small offices anywhere in the Borough save for ground floor level of town centres;(c) permit small offices anywhere in the Borough; require medium offices to be located in town centres, in other accessible areas, in Employment Zones and in commercial mews; require large offices to be located in higher order town centres and other accessible areas, except where the proposal:<ul style="list-style-type: none">(i) results in shared communal residential/
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	<p>business entrance;</p> <p>(ii) results in the net loss of any residential units or floorspace; or</p> <p>(iii) in the case of a town centre, harms the retail function of that centre;</p> <p>(d) <u>permit office development on the Earls Court and Kensal Gasworks strategic sites;</u></p> <p>(e) permit business centres at upper floor levels of higher order town centres, within accessible areas and within Employment Zones;</p> <p>(f) require all new business floorspace over 100m² to be flexible, capable of accommodating a range of unit sizes <u>having regard to the nature of the scheme and viability;</u></p>
<p>p179 para 31.3.43 Arts and culture uses</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons Reference to the cultural facilities proposed at Earls Court as part of the strategic site allocation is added for clarity. This will make the document effective in delivering the vision for the site and the document sound.</p> <p>Changes sought 31.3.43 The Borough's arts and cultural uses include museums, art galleries, exhibition spaces, theatres, cinemas and studios. Several of these facilities are enjoyed by more than just a local audience, but have a national, and, in some cases, an international draw. <u>New cultural facilities or attractions that comprise a destination are proposed at Earls Court as part of the Earls Court Regeneration Area. Further detail regarding the types of uses and their location within the Regeneration Area will be determined through a Planning Framework and masterplanning.</u></p>
<p>p182 Corporate and partner actions for fostering vitality</p>	<p>Legally compliant – N/A</p> <p>Unsound – not effective</p> <p>Reasons See Key Themes Summary in C&C's submission document.</p>

	<p>The proposed change reflects the development potential of the Earls Court Regeneration Area as described elsewhere in the document. It provides consistency and clarity to make the strategy effective and sound.</p> <p>Changes sought (3) Planning officers will work with land owners and other stakeholders to deliver two new town centres in the north of the Borough, in the Kensal and Latimer areas <u>and within the Earls Court Regeneration Area.</u></p>
<p>p183 para 32.2.2 and Policy CT1 Improving alternatives to car use</p>	<p>Legally compliant – yes</p> <p>Unsound – not justified, not effective</p> <p>Reasons There is no sound and credible evidence base to demonstrate that converting the Earls Court road system to 2-way working is achievable or would deliver the benefits sought. Para 26.2.4 refers to initial feasibility work having been undertaken but this assessment does not form part of the Council’s evidence base to the PS Core Strategy. In addition, the Council’s response to C&C’s earlier representations states that this work would need to be updated to include development proposals in the area.</p> <p>The GLA’s representations to earlier iterations of the document refer to previous studies showing that “removal of the one-way system is highly problematic to achieve” and that TfL has “no plans at present to remove the one-way system and as such no funding has been identified for this”. The Council’s response to these representations state it is aware of the difficulty in unravelling the one-way system, yet no evidence has been put forward by the Council to justify maintaining this approach as the most appropriate strategy when considered against reasonable alternatives. There also seems to have been very little support to unravelling the one way system from the local community during previous consultations.</p> <p>For these reasons, deliverability of 2-way working is uncertain and it is not appropriate, therefore, to</p>

	<p>“require” development to contribute to this project. As currently worded the policy is not effective. By widening the text so it refers to making improvements to these streets and exploring the potential for one way working would bring the policy in line with PPS12. The proposal would continue to recognise the importance of meeting Core Strategy visions for an engaging public realm, better travel choices and respect for environmental limits.</p> <p>Changes sought</p> <p>32.2.2 In a Borough with such a high concentration of shops, businesses, and arts and cultural facilities, walking and cycling can often be the quickest and easiest way of getting to places. Through constantly improving the street environment, removing and bridging existing barriers, supporting the London Cycle Hire Scheme and by ensuring new development provides the appropriate facilities, the Council will ensure that the number of journeys made on foot and by bicycle increases. Where residents need to use a car, a dense network of on-street car club bays will mean they do not need to own their own vehicle. The communities surrounding the Earl's Court One-Way System are currently blighted by traffic. This would be improved by returning the roads to two-way operation. <u>Alternative proposals which can improve the position will be supported, including pedestrian and environmental improvements.</u></p> <p>Policy CT1</p> <p>The Council will ensure that there are better alternatives to car use by making it easier and more attractive to walk, cycle and use public transport and by managing traffic congestion and the supply of car parking.</p> <p>To deliver this the Council will:</p> <p>(n) work with TfL to improve the streets within the Earl's Court One-Way System <u>and investigate the potential of returning the streets to</u> by seeking two-way operation, and by requiring developments to contribute to this objective;</p>
p187 – Policy CT2 New and enhanced rail infrastructure	Legally compliant – N/A

	<p>Sound – not effective</p> <p>Reasons The proposed changes are required for the policy to have some flexibility in (e) to be effective. The current drafting refers to the transport improvements as a requirement which is not deliverable. There may be scope to for some of the transport improvements sought in (e) as part of a comprehensive scheme for the wider Earls Court Regeneration Area. However, this will require detailed analysis into feasibility and viability involving third parties including TfL and Network Rail and will also depend on the final quantum and land use mix proposed across the Opportunity Area. Further detail will emerge through the masterplanning process and as a result of transport capacity analysis currently being undertaken by TfL.</p> <p>Changes sought Policy CT2 The Council will require improved access to existing and planned new rail infrastructure in the Borough.</p> <p>To deliver this the Council will:</p> <ul style="list-style-type: none"> (a) require developments at the allocated Kensal Gasworks site to establish a Crossrail Station, subject to approval by Crossrail Limited; (b) promote the creation of a new station on the West London Line at North Pole Road; (c) protect the safeguarded route and associated land for the Chelsea-Hackney Line, including a station at Sloane Square and near Chelsea Old Town Hall on the King's Road; (d) promote a station further west, potentially at Imperial Wharf, as part of the Chelsea-Hackney Line; (e) <u>subject to feasibility and viability testing seek opportunities for</u> require improvements to the accessibility of West Brompton Station, measures to increase the capacity of the West London Line and improvements to its interchange with the underground network, as part of any <u>comprehensive</u> redevelopment of the Earl's Court <u>Regeneration Area</u> Exhibition Centre.
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<p>p189 para 33.2.5 and Policy CR1 Street Network</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The proposed changes seek increased flexibility for the policy to be effective. It will not always be feasible to change street network patterns. For example, in the case of the Earls Court one-way system, TfL is not supportive of proposed 2-way working, as explained in C&C’s representations to Policy CT1.</p> <p>When considering a regeneration site connectivity with the surrounding area will be important. Whilst the legibility of new routes may be enhanced by drawing from historic patterns, there also needs to be flexibility to allow the introduction of new layouts, reflecting the uses and scale of development being proposed and achieving the wider masterplanning objectives for the strategic sites. The policy should recognise the potential for positive change.</p> <p>Large scale development proposals such as the Earls Court Regeneration Area should embrace a range of urban typologies to reflect different land uses and ranges in density. Whilst a finer grain of development may be appropriate for residential areas, alternative plan forms will be more suited to accommodate larger commercial premises and achieving necessary building efficiencies.</p> <p>Change sought 33.2.5 However, there are parts of the Borough where the public realm is of a lesser quality and in need of significant attention. Areas such as the Westway, Cromwell Road, the Earl's Court One-Way System, Kensal, World's End and Latimer. Establishing <u>where feasible</u> a new and improved street network, drawing from the Borough’s historic patterns and public spaces, will be at the heart of the successful regeneration of these areas.</p> <p>Policy CR1 The Council will require a well connected, inclusive and legible network of streets to be maintained and enhanced.</p>
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	<p>To deliver this the Council will:</p> <p>(a) require, in areas of regeneration and large scale redevelopment, the new street network to be inspired by the Borough’s historic street patterns <u>whilst also taking in to account the proposed land use and scale of redevelopment and urban design rationale for place-making</u> to ensure optimal connectivity and accessibility; etc</p>
<p>p192 Policy CR2 Three Dimensional Form</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The Policy is not effective as it is too prescriptive to achieve the masterplanning objectives for the strategic sites.</p> <p>Large scale development proposals such as the Earls Court Regeneration Area should embrace a range of urban typologies to reflect different land uses and ranges in density. Whilst a finer grain of development may be appropriate for residential areas, alternative plan forms will be more suited to accommodate larger commercial premises and achieving necessary building efficiencies.</p> <p>Additional flexibility is sought in (c) as the relationship with existing context need not be uniform to achieve a successful piece of townscape. By Design gives the following guidance “Relating new development to the general pattern of building heights should not preclude a degree of variety to reflect particular circumstances” (p11).</p> <p>Changes sought Policy CR2 The Council will require that where new streets are proposed, or where development would make significant change to the form of existing streets, the resultant street form and character must draw from the traditional qualities and form of the existing high quality streets <u>whilst also taking in to account the proposed land use and scale of redevelopment and</u></p>

	<p><u>urban design rationale for place-making.</u></p> <p>To deliver this the Council will:</p> <ul style="list-style-type: none"> (a) require appropriate street widths to be established with regard to the legibility of the street function and hierarchy; (b) require the ratio of building height to street width to give a coherent and comfortable scale to the street; (c) require building lines and building scales to be consistent and related to context; (d) require a frequency and rhythm of building entrances and windows that support active street frontages and optimises community safety; (e) require a clear distinction to be maintained between public, private and communal space through the retention and provision of characteristic boundary treatments.
<p>p195 Policy CR5 Parks, gardens, open spaces and waterways</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not consistent with national policy</p> <p>Reasons The policy is not effective as it is too restrictive and not consistence with advice in PPS1 allowing flexibility for appropriately designed buildings taking in to account their townscape impacts. The visibility of a new building could have a neutral or positive impact on the Parks and Gardens that are on the Borough’s Register or their setting.</p> <p>Changes sought Policy CR5 The Council will protect, enhance and make the most of existing parks, gardens and open spaces, and require new high quality outdoor spaces to be provided.</p> <p>To deliver this the Council will:</p> <p>(b) <u>assess the impact of development</u> resist development that has an adverse effect upon the environmental and open character or visual amenity of Metropolitan Open Land and the Parks and Gardens on the Borough's Register of Special Historic Interest</p>

	in England, or their setting; etc
p197 Policy CR7 Servicing	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons It is appropriate for the policy to refer to existing servicing requirements which may alter as a result of new development or changes in existing operational requirements involving development. The proposed changes provide an effective policy.</p> <p>Changes sought Policy CR7 The Council will require servicing facilities to be well-designed, built to accommodate the demands of new <u>and existing</u> development and sensitively integrated into the development and the surrounding townscape. In particular servicing activities should not give rise to traffic congestion, conflict with pedestrians or be detrimental to residential amenity.</p>
p201 para 34.2.1	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The text is inconsistent with Policy CL2 which refers to new development being of the “highest architectural” quality. The proposed change introduces consistency, providing some flexibility for effective interpretation and application of the policy.</p> <p>Changes sought 34.2.1 Careful incremental improvement is needed to ensure our conservation areas remain of the highest quality. However, there are a number of small areas in the south and two large areas in the north of the Borough which are not within conservation areas. It is important that these areas are not regarded as ‘second class’ in terms of the future quality and contribution for which we should be striving. We should aspire for these areas to be our future conservation areas and exceptional <u>high architectural design</u> quality is needed to create a new design legacy for the Borough.</p>

<p>p203 para 34.3.4, 34.3.7 Policy CL1 Context and character</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not consistent with national policy</p> <p>Reasons The existing wording is too prescriptive and will compromise development opportunities and is not effective. In addition, it is inconsistent with advice in PPG15, as explained below.</p> <p>Additional text is proposed to acknowledge that the Borough has a variety of building scales and densities, sometimes (but not always) reflected by increased heights. This has been recognised in earlier versions of the Core Strategy and in the Council’s draft Tall Buildings SPD which mentions that certain locations may be appropriate for major development and increased densities which could include taller buildings. The proposed changes also retain a reference from earlier versions of the Core Strategy to increased density making better use of land, which is an important consideration to achieve sustainable development solutions.</p> <p>The current drafting is contradictory on the issue of density. It states that RBKC's context encourages high density schemes (34.3.6) and yet that density should not be a determinant of design (34.3.7). As acknowledged, the existing townscape of RBKC shows that high density is not incompatible with high quality design (34.3.6). It does not follow therefore that high density designs will undermine the Borough's commitment to protect the quality of conservation areas and to support good design. Density will be one of a number of factors to take into account in determining the appropriateness of development proposals. National guidance and the London Plan advocate density levels that are appropriate to a site and the Core Strategy should allow such levels of development to come forward. It is particularly relevant in the case of Opportunity Areas which are regarded as the capital’s reservoir of brownfield land with significant capacity to accommodate future growth.</p>
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	<p>PPG15 states that the desirability of preserving or enhancing a conservation area is a material consideration where development would be seen in views into or out of the area. The visibility of a new building could have a neutral or positive impact and still respect the character or appearance of a conservation area in accordance with PPG15, and similarly be acceptable in other sensitive views.</p> <p>The change proposed to para (b) provides clarity to ensure that the context for a site also embraces any existing development on the site.</p> <p>The changes proposed to paras (c) and (f) of the policy introduce flexibility, which is important if the strategic development sites are able to deliver the planning objectives set out in the Core Strategy vision. Para (e) is reworded to reflect PPG15. The Council's response to C&C's previous representations state that "assess" provides no policy direction. However, a blanket resistance to all development does not acknowledge that in some instances townscape impacts may be acceptable and, indeed positive. The townscape impacts of a development proposal should be considered in the round and weighed against the other impacts the scheme would generate. The policy should not unduly restrict allowing each application to be considered on its merits.</p> <p>The policy/supporting text should apply to the impacts of development in important townscape views and clarify how such "local vistas, views and gaps" will be agreed. In some instances, they may be set out in the Council's Conservation Area Proposal Statement or other adopted guidance but others will need to be agreed in consultation with the applicant.</p> <p>Changes sought Insert a new para after 34.3.4 <u>In parts of the Borough, different building scales and type give rise to greater densities of development, for example, residential towers (Trellick Tower, Latimer Road Estate and World's End Estate) and commercial buildings along transit routes (Notting Hill Gate, Kensington High Street, Cromwell Road, Brompton Road and parts of Sloane Avenue). Increased densities</u></p>
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	<p><u>make better use of land and can be appropriate in some locations. This is particularly the case in Opportunity Areas.</u></p> <p>34.3.7 However, the Council considers that densities should not be the only or foremost determinant of design, as it would undermine <u>Our duties are</u> also to have regard both to the desirability of preserving or enhancing the character or appearance of conservation areas, and to good design⁽³⁰²⁾. The density matrix in the London Plan⁽³⁰³⁾ therefore needs to be read in relation to the context of the development.</p> <p>34.3.10 The quality and character of an area is not only provided by the individual buildings but it is also gained from views into and out of the area. Therefore development that impacts on <u>important</u> views, vistas and gaps is an important aspect of respecting context. <u>When considering a development proposal, the Council will agree relevant views, vistas and gaps with the applicant.</u></p> <p>Policy CL1 The Council will require all development to respect the existing context, character, and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions, including being inclusive and accessible for all.</p> <p>To deliver this the Council will:</p> <ul style="list-style-type: none"> (a) require development through its architecture and urban form to contribute positively to the context of the townscape, addressing matters such as scale, height, bulk, mass, proportion, plot width, building lines, street form, rhythm, roofscape, materials, vista, view, gaps and historic fabric; (b) require the analysis of context to be drawn from an area that is proportionate and relevant to the size of the development <u>and will take in to account the form of development currently on the site;</u> (c) require the density of development to be optimised relative to context, whilst taking into account the appropriate density range <u>for the site as a whole and its potential to deliver sustainable development and to achieve wider planning benefits;</u>
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	<p>(d) require riverside and canalside development to enhance the waterside character and setting, including opening up views and securing access to the waterway;</p> <p>(e) <u>assess the impact of resist development which interrupts, disrupts or detracts from strategic and local vistas, views and gaps and resist development which is harmful in important views having regard to its visibility in the round;</u></p> <p>(f) require a comprehensive approach to site layout and design including adjacent sites where these are suitable for redevelopment <u>taking in to account phasing requirements.</u></p>
<p>p205 para 34.3.22, 34.3.22, 34.3.26, 34.3.28, 34.3.29 High buildings</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The proposed changes add clarity and consistency with strategic policy to make the Strategy effective.</p> <p>The changes clarify that not all the Borough comprises modest development of consistent height. Parts of the borough do have larger and tall buildings, as explained in C&C’s proposed additions after para 34.3.4. The changes proposed at 34.3.24 provide clarity as the current drafting is cumbersome and unclear.</p> <p>The changes reflect strategic policy which identifies Opportunity Areas as potential locations for tall buildings where there is good access by public transport.</p> <p>The proposed changes allow flexibility for development proposals that have a neutral impact on the townscape. A building that is visible from different locations may be acceptable providing it has a positive or neutral impact on local townscape. In addition, a negative impact may be outweighed by other benefits to be generated by the scheme. The proposed change is consistent with C&C’s proposed changes to Policy CL1. Combined, the two policies provide guidance for development having an adverse, neutral or positive impact in key views.</p> <p>The changes proposed in para 34.3.29 explain more clearly recognised good practice in the approach to be</p>

	<p>used when assessing the impact of buildings in townscape views.</p> <p>Changes sought</p> <p>34.3.22 The relatively modest and consistent height of building <u>across</u> a large part of within Kensington and Chelsea reflects the primarily residential character of the Borough. High residential densities are delivered within this townscape without recourse to tall buildings and this pattern of development with its medium-rise, high-density residential areas has produced a very attractive townscape, and is central to the Borough’s charm. Given its central location, the Borough has comparatively few tall buildings <u>compared to other central London boroughs</u>, the tallest being Trellick Tower at 98m. Tall buildings <u>Buildings that are significantly taller than the surrounding townscape are therefore very much the exception and proposals for new tall buildings must be considered carefully in relation to sensitive features of the townscape. Building height is thus a critical issue and a very sensitive feature of the townscape.</u></p> <p>34.3.23 One approach to determining the appropriate location of high buildings would be to identify where they are not appropriate – such as in Conservation Areas. However, such an approach risks inferring that they are therefore appropriate anywhere else. That would not be an appropriate approach, because h <u>Higher buildings considered as local or district landmarks or very tall buildings should must only be located where - depending on their impact - they give meaning to the local or Borough townscape.</u></p> <p>34.3.26 Very tall buildings, more than 4 times their context, characterise central metropolitan areas and are thus inappropriate <u>across much of the to this Borough. Designated Opportunity Areas fulfil a strategic role and may be suitable for tall buildings, subject to satisfying the criteria in Policy CL2</u></p> <p>34.3.28 High buildings can interrupt views that are important in the townscape, both those identified within the London Plan or within the Council’s Conservation Area Proposal Statements or other adopted documents. It is not enough, however, to</p>
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	<p>ensure that their location avoids this. They should make a <u>neutral or positive</u> intervention in the existing townscape. Because district landmarks are visible over a wider area, their location must be of significance to the Borough as a whole, and they will therefore be exceptional. Their location and the townscape sensitivity are therefore of the utmost <u>significant</u> importance.</p> <p>34.3.29 Care is also needed to ensure that their visibility <u>visibility of high buildings</u> is assessed in the round to ensure they do not appear in incongruous with their context. A computer generated zone of visual influence <u>should be identified and the likely visible impact of the scheme assessed from points within that zone agreed with the Council.</u> The potential visual impact of <u>proposals is most accurately tested and assessed through the use of computer generated representations of the existing townscape and the proposals., that includes an accurate model of the relevant context, is an essential tool in assessing the visual impact of district landmarks.</u></p>
<p>p206 Policy CL2 New buildings, extensions and modifications to existing buildings</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not consistent with national policy</p> <p>Reasons The proposed changes reflect strategic policy which identifies Opportunity Areas as potential locations for tall buildings where there is good access by public transport.</p> <p>The change proposed in (j) recognises that a taller building may be acceptable when it fulfils other strategic benefits. This may be the case with respect to the Opportunity Areas where future development is anticipated to provide a strategic role.</p> <p>The proposed change allows flexibility for development proposals that have a neutral impact on the townscape. A buildings that is visible from different locations, may be acceptable providing it has a positive or neutral impact on local townscape. In addition, a negative impact may be outweighed by other benefits to be generated by the scheme.</p>

	<p>The proposed change is consistent with C&C's proposed changes to Policy CL1. Combined, the two policies provide guidance for development having an adverse, neutral or positive impact in key views.</p> <p>Changes sought Policy CL2 The Council will require new buildings, extensions and modifications to existing buildings to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area and the way it functions.</p> <p>To deliver this the Council will, in relation to:</p> <p><i>High Buildings</i> (h) resist a proposal that exceeds the prevailing building height within the context, except where the proposal:</p> <ul style="list-style-type: none"> (i) is of a slender profile and proportion <u>having regard to its proposed use and function</u>; and (ii) does not <u>give rise to an adverse townscape impact</u> within any identified linear views; and (iii) is of high design quality; <p>(i) require a proposed local landmark to:</p> <ul style="list-style-type: none"> (i) be compatible with the scale of its context; and (ii) articulate positively a point of townscape legibility of local significance; <p>(j) require a proposed district landmark to:</p> <ul style="list-style-type: none"> (i) articulate positively a point of townscape legibility of significance for the wider Borough and neighbouring boroughs, such as deliberately framed views and specific vistas; and (ii) provide a strategic London-wide public use <u>or fulfil a strategic planning objective</u>; <p>(k) require an assessment of the zone of visual influence of a proposed district landmark within or visible from the Borough, to demonstrate that <u>when considered in the round</u> the building has a wholly <u>positive or neutral</u> visual impact on the quality and</p>
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	<p>character of the Borough's or neighbouring boroughs' townscape;</p> <p>(l) resist a proposal that is of a metropolitan scale <u>unless is it within an Opportunity Area and accessible by public transport and fulfils the criteria applicable to a district landmark in (j) and (m);</u></p> <p>(m) require <u>sufficient information to enable a full assessment of the impacts a full planning application</u> for of a proposed district landmark; etc</p>
<p>p212 Corporate or partnership actions</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The selection of architects will be a developer's decision. The proposed change is less prescriptive, so the action can be deliverable and effective.</p> <p>Changes sought (9) The Council will <u>encourage</u> make use of architectural competitions to help select architects for developments on major sites, leading to better quality design;</p>
<p>p215 Paragraph 35.3.6</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons This does not identify the key issue in how the SHMA drew its conclusions about the potential role for intermediate accommodation in RBKC.</p> <p>Changes sought 35.3.6 Research has been undertaken to ascertain the type of affordable housing that should be provided in the Borough, taking into account the ability of a sample of households to afford different products. <u>On the assumption that intermediate products are priced only at the mid point between social rented housing costs and those of entering the private market this research suggests that 4% of affordable housing should be equity based intermediate housing, 11% should be intermediate rented housing, and 85% should be social</u></p>

	rented housing(319).
p217 Paragraph 35.3.13	<p>Legally compliant – N/A</p> <p>Sound – not effective inconsistent with national guidance</p> <p>Reasons It is beyond the scope of planning policy to specify and restrict the price at which housing is transferred under a planning obligation.</p> <p>Changes sought The Council caps the cost of developing affordable housing, therefore in terms of costs to the developer, there is little financial difference in providing a social rented unit compared to an intermediate affordable unit. Land values in the Borough, however, make the provision of intermediate housing at the usefully affordable point very difficult</p>
p215 Policy CH1 Housing Targets	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The specific changes to the policy propose deleting the term ‘require’ as it does not provide for sufficient flexibility in application of this policy in light of the suggested amendments to policy CH2 and having regard to the approach taken by the SHMA in establishing the role for intermediate housing products in RBKC.</p> <p>The proposed amendments to tenure mix targets accord with the position being advocated as part of the London Housing Strategy and acknowledge the need for increasing the opportunity to deliver mixed and balanced communities in accordance with PPS3 and in light of the particular concentrations of social rented tenures which exist in the Borough. The proposed change will increase the effectiveness of the policy to achieve the Council’s objectives.</p> <p>Changes sought Policy CH1 The Council will ensure that sufficient housing sites</p>

	<p>are allocated in order to ensure the housing targets are met.</p> <p>To deliver this the Council will:</p> <ul style="list-style-type: none"> a) make provision for a minimum of 350 net additional dwellings a year until the London Plan is replaced (estimated as 2011/12). From this date the Council is planning to make provision for a minimum of 600 net additional dwellings a year, until c.2021/22. The exact target will be set through the London Plan process; b) make provision for the maximum amount of affordable housing with a target of 200 units per annum from 2011/12 until 2021/22 from all sources; c) <u>generally seek the provision of require affordable housing tenures to be provided</u> such that they work towards a Borough wide target of 60855% social rented housing and 40455% Intermediate housing. <u>It is acknowledged that in the following wards Golborne, St.Charles, Notting Barns, Colville, Norland, Earl's Court and Cremorne wards an increased provision of intermediate provision will be targeted in order to broaden tenure choice in these areas.</u>
<p>p218 Paragraph 35.3.23</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons Amendments required to acknowledge that all aspects of Lifetime homes may not be reasonably achievable in all types of residential development .</p> <p>Changes sought Lifetime homes standards will be used to address this issue, <u>although it is acknowledged that full compliance with all aspects can be problematic within certain build forms. because</u> New homes will incorporate basic design criteria to ensure that the properties are convenient, flexible and adaptable. They are designed to meet a families changing needs over time, but are not intended to be fully wheelchair accessible. The</p>

	standards exceed those in Part M of the Building Regulations which are only concerned with enabling disabled people to visit a dwelling. The criteria include issues which relate to parking, the approach to a dwelling, entrance treatment and the design of internal spaces(334
p219 Policy CH2 Housing diversity	<p>Legally compliant – N/A</p> <p>Sound – not effective, not consistent with national policy</p> <p>Reasons The proposed changes provide additional clarity of wording in respect of the Council’s key housing priority, the re-provision of older person accommodation, allow provision of studio accommodation in leasehold accommodation and ensure affordability of intermediate accommodation accords with PPS3 and the CS Glossary. They also provide guidance as to how particular standards will be implemented by the Council.</p> <p>Revisions to the mechanisms by which affordable housing is calculated are considered necessary to provide consistency with PPS3 and the London Plan. Provision as a proportion of habitable rooms or units provides sufficient flexibility for the appropriate amount of affordable housing to be advanced on differing development schemes and on this basis a departure from the London Plan position (to a floorspace calculation) is not justified</p> <p>Revisions to tenure balance of new provision are considered appropriate in light of the strategic direction from the GLA and the need to improve tenure balance across the Borough’s affordable offer to the end of the plan period. Furthermore the SHMA takes a particular approach to determining the potential role for intermediate provision which only ‘tests’ households’ ability to afford intermediate priced accommodation at the ‘usefully affordable level’. This may understate the ability of this tenure to resolve need particularly where it is provided at a range of price points between social rented levels and market provision. .</p> <p>The requirement within the policy to meet unquantified</p>

	<p>standards in respect of floorspace and floor to ceiling heights should be deleted or guidance added as to the scope of these requirements.</p> <p>It is not apparent that the proposed policy requirement has had regard to findings of the Housing Viability study. This concluded that provision of 50% affordable housing would not be a viable proposition in the current market and a 40% target would be the ‘highest’ that could be reasonably advanced. (para 7.15). Amendment is therefore recommended to reflect an overall 40% target, though in any event the particular viability issues facing large sites in terms of up front infrastructure costs should be acknowledged. This will also align with the direction of PPS3 paragraph 29.</p> <p>Small revisions are necessary to part (m) in order to allow for alternative approaches to the delivery of off site affordable housing subject to agreement with the Council.</p> <p>Together the amendments ensure compliance with PPS3 and the London plan and provide added assurance that policy promotes rather than frustrates delivery of housing in accordance with targets and other policy objectives. They will increase the effectiveness of the policy.</p> <p>Changes sought Policy CH2 The Council's will ensure new housing development is provided so as to further refine the grain of the mix of housing across the Borough <u>key housing priority is the delivery of new homes both market and affordable which meet needs and contribute towards providing a broad mix of housing for a wide variety of households in the area.</u></p> <p>To deliver this the Council will:</p> <p>Housing mix and type</p> <p>a. require new residential developments to include a mix of types, tenures and sizes of homes to reflect the <u>which contribute to meeting the varying and evidenced</u> needs of the Borough, taking in to account the characteristics of the site,</p>
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	<p><u>development viability</u> and current evidence in relation to housing need;</p> <p>b. require new residential developments, including conversions, amalgamations and changes of use, to be designed to meet <u>where possible</u> all the following standards:</p> <p>(i) lifetime homes;</p> <p>(ii) floorspace and floor to ceiling heights;</p> <p>(iii) wheelchair accessibility for a minimum of 10% of dwellings</p> <p>c. encourage extra care housing, particularly in the south of the Borough.</p> <p>d. protect houses in multiple occupation except where a proposal concerns conversion into self-contained studio flats, and require any such proposal to be subject to a S106 agreement to ensure the flats remain <u>long term</u> as studios in perpetuity;</p> <p>e. resist the loss of residential hostels except where the site will be utilized as a different form of affordable housing;</p> <p>f. resist development which results in the net loss of five or more residential units;</p> <p>g. require development that results in the amalgamation of residential units to be subject to a s106 agreement to ensure the resultant units are not further amalgamated in the future;</p> <p>h. require housing schemes to include outdoor amenity space;</p> <p>Affordable housing</p> <p>i. <u>on schemes which have the capacity to provide 10 homes or more, require the maximum reasonable amount of affordable housing with the presumption being at least 50% provision on gross</u></p>
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	<p>residential floor space in excess of 800m² the Council will target the provision of up to 40% 50% of either habitable room numbers or unit numbers as affordable housing provision taking into account contributions towards the Borough target from other sources of supply, the need to promote rather than restrain residential development, the viability of the proposals, particularly large sites with significant infrastructure costs, and site specific circumstances including the availability of public subsidy. Where an applicant identifies that a 40% 50% affordable contribution cannot be viably supported by a development the council will require a viability assessment, using the GLA toolkit or an agreed alternative, to be submitted as part of the planning application documentation;</p> <p>j. require <u>as appropriate provision to be in the form of a commuted sum in lieu of affordable housing within the scheme where schemes propose less than 12 homes</u>1,200m² of gross external residential floor space is proposed;</p> <p>k. require <u>provision of affordable housing provision of affordable homes on site within the scheme where 12 homes or more than 1,200m² of gross external residential floor space is are proposed,</u> unless exceptional circumstances <u>are agreed to exist;</u></p> <p>l. require <u>that any off-site off-scheme affordable housing is not generally provided to be provided in within the any wards except the following ward areas as illustrated on the Housing diversity map in this chapter: Golborne, St.Charles, Notting Barns, Colville, Norland, Earl's Court and Cremorne wards;</u></p> <p>m. require, where appropriate, an application to be made for any 'off-site' affordable housing concurrently with the main planning application and that the two applications are linked through a Section 106 agreement or unilateral undertaking;</p> <p>n. require that <u>where provided within a scheme</u></p>
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	<p>affordable and market housing and market housing are delivered so as to achieve an <u>integrated tenure blind design which does not prejudice the creation of mixed and balanced communities</u> have the same external appearance;</p> <p>o. require the affordable and market housing to have equivalent <u>acceptable levels of amenity</u> in relation to factors including views, daylight, noise and proximity to open space, playspace, community facilities, and shops;</p> <p>p. require a viability assessment, using the GLA toolkit or an agreed alternative, to be submitted where schemes fail to provide 50% affordable housing on floorspace in excess of 800m2;</p> <p>q. require that affordable housing includes a minimum of 15% intermediate housing in Golborne, St.Charles, Notting Barns, Norland, Colville, Earl’s Court and Cremorne wards <u>affordable housing should include a minimum of 40% intermediate housing. In all other wards a minimum of 85% social rented housing should be provided</u> <u>Elsewhere in the Borough consideration should be given to the Borough wide targets, need, scheme viability and site specific circumstances;</u></p> <p>r. require that the provision of intermediate housing is provided at the “usefully affordable” <u>which is affordable to households whose income prevents them from accessing suitable accommodation on the open market locally.</u></p>
<p>p225 Respecting environmental limits plan</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons To provide flexibility for the site potentially to deliver the facilities in accordance with a Masterplan for the Regeneration Area, consistent with C&C’s proposed changes to para 26.2.9, making the document effective.</p> <p>Changes sought The Map should make it clear that a potential on-site waste management facility may be located within the</p>

	<p>wider EC Regeneration Area, not necessarily within the RBKC part of the wider site. See map extract at Appendix 4.</p>
<p>p227 Policy CE1 Climate change</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not consistent with national policy</p> <p>Reasons A new criteria is added (para i) requiring development proposals to be supported by a carbon footprint analysis. This will provide a more accurate reflection of the environmental footprint of the development taking in to account factors not covered by the Code for Sustainable Homes. The CfSH does not equate to zero carbon. Changes to the building regulations may not equate to CfSH definitions of Zero Carbon and current requirements for Code 6. Consequently, the changes sought in paras (a) and (b) propose minimum and aspirational targets. In addition, the current drafting goes beyond the building regulations between 2013 and 2015 by requiring Level 5. A further code is being developed for non domestic buildings to replace BREEAM . This is reflected in the proposed changes at paras (a) and (b).</p> <p>Policy CE1(e) should be expressed as subject to viability and feasibility constraints to reflect the need for a development's deliverability to be looked at holistically.</p> <p>Policy CE(h) should be subject to feasibility and good design to ensure feasible and appropriately well designed development.</p> <p>Policy CE(i) should be deleted as it appears to give the Council the ability to leverage financial contributions, impose planning conditions or extend or raise sustainability standards retrospectively in relation to existing development which is onerous.</p> <p>These changes will put in place deliverable targets and make the policy more effective.</p> <p>Changes sought</p>

	<p>Policy CE1</p> <p>The Council recognises the Government's targets to reduce national carbon dioxide emissions by 26% against 1990 levels by 2020 in order to meet a 60% reduction by 2050 and will require development to make a significant contribution towards this target.</p> <p>To deliver this the Council will:</p> <p>(a) require an assessment to demonstrate that all new buildings and extensions defined as major development achieves the following Code for Sustainable Homes / BREEAM standards:</p> <p>(i) Residential Development: Code for Sustainable Homes:</p> <ul style="list-style-type: none"> • Up to 2012: Level Four; • 2013 to 2015: <u>new development should seek to exceed Building Regulations on energy and water and aspire to achieve Level Five</u> • 2016 onwards: in addition to meeting Building Regulations on energy and water, <u>new development should aspire to achieve Level Six</u> <p>(ii) Non Residential Development: Relevant BREEAM Assessment <u>or future replacement code</u></p> <ul style="list-style-type: none"> • Up to 2015: Excellent; • 2016 onwards: Outstanding; <p>(b) require an assessment to demonstrate that conversions and refurbishment defined as major development achieves the following relevant BREEAM standards <u>or future replacement code</u>:</p> <p>(i) Residential Development: EcoHomes Very Good (at design and post construction) with 40% of credits achieved under the Energy, Water and Materials sections, or comparable when BREEAM for refurbishment is published;</p> <p>(ii) Non Residential Development:</p> <ul style="list-style-type: none"> • Up to 2015: Very Good (with 40% of credits achieved under the Energy, Water and Materials sections); • 2016 onwards: Excellent (with 40% of credits achieved under the Energy, Water and Materials sections);
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	<p>e. require the provision, <u>subject to feasibility and viability</u>, of a Combined Cooling, Heat and Power plant, or similar, which is of suitable size to service the planned development and contribute as part of a district heat and energy network</p> <p>h. require development to incorporate, <u>where feasible and part of good design</u>, measures that will contribute to on-site sustainable food production commensurate with the scale of development</p> <p>i. require, in due course, development to reduce carbon dioxide emissions and mitigate or adapt to climate change, especially from the existing building stock, through financial contributions, planning conditions and extending or raising the Code for Sustainable Homes and BREEAM standards for other types of development</p> <p>(i) require a carbon footprint analysis to demonstrate how a whole development will <u>enable achieve</u> an 80% reduction in total carbon footprint by 2050, <u>taking account of planned reductions in the carbon-intensity of upstream energy generation and the wider economy</u>. Implementation of the assessment recommendations will be monitored at key stages of the development process to ensure commitments to reducing carbon emissions are being met.</p>
<p>p229 Policy CE2 Flooding</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not consistent with national policy</p> <p>Reasons The change in (a) is proposed to be consistent with terminology in PPS25. As currently drafted the policy would resist uses such as hotels, health services and education uses in buildings within Zone 3. This is inconsistent with the findings of the SFRA which advises that land in Zone 3 should not be used for basement flats but is acceptable for most other uses</p> <p>The change in (d) is proposed to reflect more accurately deliverable solutions. The Council’s response to C&C’s earlier representations refer to its</p>

	<p>intention to strengthen the approach to reduce, the risk of flooding. However, the current drafting requires a reduction in the “volume” of discharge which in practice, is likely to be impossible to achieve in most instances. This is due to the impermeable ground conditions in areas underlain by clay, which is typical of the local area. The proposed drafting will make the policy effective and sound.</p> <p>Changes sought Policy CE2 The Council will require development to adapt to fluvial flooding and mitigate the effects of, and adapt to, surface water and sewer flooding. To deliver this the Council will:</p> <ul style="list-style-type: none"> (a) resist <u>highly</u> vulnerable development, including self-contained basement dwellings, in Flood Risk Zone 3 as defined in the Strategic Flood Risk Assessment; (b) require a site-specific Flood Risk Assessment, including an ‘Exception Test’ for all development in Flood Risk Zone 2 and 3 as defined in the Strategic Flood Risk Assessment, and for all sites greater than 1 hectare; (c) require development at risk from flooding in Flood Risk Zones 2 & 3 or sites greater than 1ha to incorporate suitable flood defence or flood mitigation measures in accordance with the recommendations of the site-specific Flood Risk Assessment; (d) require sustainable urban drainage, or other measures, to reduce both the volume and the speed of water run off to the drainage system ensuring that surface water run-off is managed as close to its source as possible in line with the hierarchy in the London Plan. In particular, major development must make a significant reduction in the current volume and speed of water run off to the drainage system; (e) resist impermeable surfaces in front gardens; (f) require development adjacent to the Thames to be set back from the Thames flood defence to enable the sustainable and cost-effective upgrade of flood defences over the next 50 to 100 years; (g) require works associated with the construction
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	<p>of the Thames Tideway Tunnel to:</p> <ul style="list-style-type: none"> (i) preserve or enhance the character or appearance of the Cheyne, Royal Hospital and Thames Conservation areas; (ii) preserve the setting of listed buildings and Parks and Gardens of Special Historic Interest (i.e. the Royal Hospital grounds); (iii) not adversely impact on amenity; (iv) not compromise the future of Cremorne Wharf which is a Safeguarded Wharf.
<p>p231 Policy CE3 Waste</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The proposed change in (b) brings the policy in line with terminology in the Respecting Environmental Limits map on page 225 and paras 36.3.22 and 36.3.25. Waste “treatment” plants (in their broad waste industry sense) are not appropriate to the EC Regeneration Area. A “sorting plant” would also not be suitable due to potential amenity impacts.</p> <p>The change in (d) provides flexibility for an effective policy as achieving this requirement will be dependent on third parties and may not be deliverable in all cases.</p> <p>Changes sought The Council will meet the waste apportionment figure as set out in the London Plan and will ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced.</p> <p>To deliver this the Council will:</p> <ul style="list-style-type: none"> (b) require on-site waste treatment <u>management</u> facilities as part of development at Kensal and Earl's Court to handle waste arising from the new uses on the site (this could include recycling facilities and anaerobic digestion); (d) require that <u>where feasible and viable</u> development proposals make use of the rail and the waterway network for the transportation of construction waste

	and other waste;
<p>p233 para 36.3.42 Policy CE6 Noise and vibration</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons The proposed changes provide flexibility for development proposals to meet the Core Strategy objectives. The Council’s response to C&C’s earlier representations state that additional flexibility is introduced in to this version of the policy but this does not seem to have occurred. The change proposed in (b) retains references to national and regional guidance in earlier draft of the policy and qualifies the factors to be taken in to account in considering exceptions. The change proposed in (d) is required for a deliverable policy. In practice it will not always be possible to “enhance” quiet areas.</p> <p>Changes sought Policy CE6 The Council will carefully control the impact of noise and vibration generating sources which affect amenity. The Council will require new noise and vibration sensitive developments to mitigate and protect occupiers against existing sources of noise and vibration. To deliver this the Council will:</p> <ul style="list-style-type: none"> (a) require that noise and vibration sensitive development is located in the most appropriate location and protected against existing sources of noise and vibration, through careful design, layout and use of materials, to ensure adequate insulation from sound and vibration; (b) resist developments which fail to meet <u>national, regional and local noise and vibration standards guidance as contained in the Council’s Noise SPD, without suitable justification having regard to the circumstances of the site and development proposal and the potential to achieve the Borough’s strategic objectives;</u> (c) resist all applications for noise and vibration generating development and plant that would have an unacceptable noise and vibration impact on surrounding amenity;

	<p>(d) require that development protects, respects and <u>where feasible</u> enhances the attributes of the special significance and tranquillity of tranquil quiet areas.</p>
<p>p244, 245 Infrastructure</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C’s submission document. Returning the roads to a two way operation (‘unraveling’) has not been tested and is yet to be supported by the GLA and TfL. The revised text provides flexibility for a deliverable solution to come forward, without undermining the overall objective. Funding sources and delivery management and organization may involve multiple parties which should be reflected.</p> <p>Changes sought</p> <p>Where column – Earl’s Court one-way system.</p> <p>What column – <u>"Improvement"</u> to the ‘Unraveling’ the Earls Court one-way system.</p> <p>Sources of funding column – TfL, highways authority, developer contributions <u>and potential further sources of funding</u></p>
<p>p269, 270 38.5.7 Monitoring strategic sites, Earls Court</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons See Key Themes Summary in C&C’s submission document. Consequential changes are required to the policy targets and outputs to reflect the strategic site allocation, including C&C’s proposed changes to chapters 10 and 26 and to reflect the opportunity Area designation on the Replacement London Plan</p> <p>Changes sought</p>

	<p>CA7(b) Target column - Provide 10,000 sqm (108,000 sqft) of <u>non residential floorspace to include office, commercial, leisure, cultural/ destination and retail uses floorspace</u></p> <p>CA7(d) Monitoring column – The new use of the Exhibition Centre proposed as part of a planning application for the redevelopment of the site <u>Earls Court Regeneration Area</u></p> <p><u>The new use of the Earls Court Regeneration Area Exhibition Centre proposed as part of planning application for the redevelopment of the site</u></p> <p>CA7(l) Target column – Secure highway contributions including measures to facilitate <u>improvements to the unraveling</u> of the Earl’s Court one way system</p> <p>Monitoring column – The unraveling of <u>Improvements to the one-way system and highway improvements</u> proposed as part of planning application for the redevelopment of the site.</p>
<p>p304 No7 Contingencies and risks</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective</p> <p>Reasons To properly reflect the development proposals for the Earls Court Regeneration Area and to ensure deliverability in accordance with PPS12.</p> <p>Changes sought Policy – Earls Court Exhibition Centre: mixed use redevelopment including an exhibition or convention use <u>cultural and destination use.</u></p> <p>Dependency: if this policy is not implemented, what may not happen on the ground as a result? – The Earls Court exhibition ‘brand’ is lost if no exhibition center or convention centre use is included in the redevelopment. <u>Redevelopment and regeneration in line with London Plan Opportunity Area designation and policies and Core Strategy Places and Allocations</u></p>

	<p><u>objectives for Earl's Court is not achieved.</u></p> <p>Central to the delivery of the strategy vision? – Yes</p> <p>Risk(s): what can get in the way of implementing the policy? – The <u>cultural and destination exhibition or convention</u> uses require too high a cross subsidy from the development forcing up development volumes to unacceptable levels.</p> <p>Likelihood of risk occurring? (Low, Med, High) – Negligible <u>TBC depending on viability studies</u></p> <p>Impact on the strategy if risk occurs? (Low, Med, High) – High <u>Medium</u></p> <p>Plan B Required? (Yes/No) – Yes</p> <p>Potential Alternatives – Whilst the possibility of an international convention centre may prove more difficult to achieve, A scheme not involving as many cultural or destination uses could be implemented if that was the only way of achieving regeneration. However, it is clear that the current Earls Court owners have every intention of building on the Earls Court brand, so no Plan B developed despite the "<u>medium</u>"-high impact score.</p>
<p>p304 No7 Contingencies and risks</p>	<p>Legally compliant – N/A</p> <p>Sound – not effective, not justified</p> <p>Reasons and changes sought Delete the column dealing with the dependency entitled: "Earls Court One-Way system does not receive sufficient investment to be unraveled, and thus remains in place". This is because the C&C proposed change to the policy allows for appropriate flexibility in relation to "Earls Court One-Way system "improvements" which makes this issue superfluous as in reality what can feasibly and viably be done to improve the One-Way system should be done and there is no "Plan B" in this context since if it is not feasible or viable, there is not realistically a "Plan B".</p> <p>.</p>
<p>p319 Housing Trajectory</p>	<p>Legally compliant – N/A</p>

<p>and Supporting Information and p.321 Appendix 2 Further Evidence Affordable Housing Target</p>	<p>Sound – not effective, not justified</p> <p>Reasons and changes sought The housing trajectory at p.319 should be adjusted to reflect an additional 500 units (minimum) at the Earls Court strategic site from 2013/14 onwards.</p> <p>The table showing the strategic site allocations on p.321 should be adjusted to show a minimum of 1000 units at Earls Court and an estimate of affordable units of 0-400 (indicative, depending on affordable housing delivery across the wider Earls Court Regeneration Area and viability).</p> <p>This change reflects (1) the results of the Council’s Housing Viability study which concluded that provision of 50% affordable housing would not be a viable proposition in the current market and a 40% target would be the ‘highest’ that could be reasonably advanced (para 7.15), (2) C&C’s proposed changes to policy CH2, (3) <u>the need for a detailed viability assessment to be undertaken, (4) phasing requirements, and (5) to reflect the fact that the delivery of affordable housing will be assessed across the whole of the Earls Court Regeneration Area, meaning that the number to be delivered in RBKC will be influenced by the whole site provision.</u></p>
<p>p345 Earls Court Strategic Site</p>	<p>Proposed change The site plan should be revised to reflect the Earls Court Regeneration Area (RBKC Area) boundary for the land within RBKC, as shown on the plan at Appendix 1 See plan extract at Appendix 4.</p>
<p>p355 Flood Risk Zones 2 and 3 Brompton Cemetery</p>	<p>Proposed change Clarification should be added to explain the dark shading on the plan A relevant extract from the SFRA Residual Risk map should also be included</p> <p>Reason for change For the reasons explained in representations above to Policy CE2</p>

<p>p357 Flood Risk Zones 2 and 3 Philbeach</p>	<p>Proposed change Clarification should be added to explain the dark shading on the plan A relevant extract from the SFRA Residual Risk map should also be included</p> <p>Reason for change For the reasons explained in representations above to Policy CE2</p>
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5.0 CONCLUSIONS

5.1 These representations propose changes to the PS Core Strategy so as to deliver a sound document to govern the future of land within EC Regeneration Area falling within RBKC. Adjustments to the Core Strategy in accordance with these representations will achieve a strategy that is:

- justified
- effective i.e. deliverable, flexible and able to be monitored
- consistent with national policy,

all required and in accordance with PPS12.

5.2 C&C has made representations as the Core Strategy has been evolving through the consultation process. It has clearly stated its wishes to work with the Council and other stakeholders to participate in the development of the policy framework needed to deliver redevelopment of the EC Regeneration Area.

5.3 The changes sought are set out in the text and map amendments at Appendices 3, 4 and 5 and in the schedule at Section 4.0. If appropriate, C&C will expand upon these representations when the document is formally submitted to the Secretary of State.

5.4 The Earls Court Regeneration Area including the land within RBKC represents an exciting strategic redevelopment opportunity for the Borough, supported in the RLP which will benefit a wide range of stakeholders and lead to a high quality sustainable mixed community.

10 December 2009

EARLS COURT REGENERATION AREA
CORE STRATEGY EVIDENCE BASE
DESIGN PRINCIPLES SUMMARY STUDY

Capital & Counties
40 Broadway
London SW1H 0BT



Benoy

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1.0 KEY POINTS SUMMARY

1.1 This study has been prepared for Capital & Counties on behalf of the Earls Court & Olympia Group. It forms part of the evidence base to support the allocation of Earls Court Regeneration Area within the Core Strategies for the Royal Borough of Kensington and Chelsea (RBKC) and the London borough of Hammersmith and Fulham (LBHF) and its purpose is:

1.1.1 To identify the relevant planning policy by way of context

1.1.2 To describe the vision for potential future development within the Earls Court Regeneration Area

1.1.3 To explain the design principles which would underpin the quality of future development and the public realm.

1.2 Using sound principles of design to inform the masterplanning and planning application processes the Earls Court Regeneration Area provides the opportunity to:

1.2.1 repair and reinvent an underutilised and physically divisive land area currently dominated by ailing building stock and significant railway infrastructure and by building on an existing well-known name transform it into a well designed desirable and significant London place with a vibrant public realm

1.2.2 build on and promote the connectivity of the Regeneration Area with its proximity to Earls Court, West Kensington and West Brompton stations (along with the adjacent A4/West Cromwell Road) and develop strong linkages to adjacent streets and local landmarks to create a well connected hub.

2.0 POLICIES AND BEST PRACTICE

2.1 Planning policy encourages high quality and inclusive design whereby development is intended to create attractive places and take the opportunities available for improving the visual character and quality of an area and that good design should contribute positively to making places better for people (PPS1, Delivering Sustainable Development).

2.2 Design principles which would underpin the masterplanning process for any proposals in the Regeneration Area would aim to address key existing and emerging policies at the regional and local level including seeking to:

2.2.1 Maximise site potential

2.2.2 Promote high quality inclusive design and create/enhance the public realm

2.2.3 Respect local context, history, built heritage, character and communities

2.2.4 Create development which is attractive to look at

2.2.5 Realise the value of open space and green infrastructure

2.2.6 Promote development of a high standard of design sensitive to and compatible with the scale, height, bulk materials and character of the surroundings

2.2.7 Promote development which conserves the inherited built environment and adds a legacy of equal quality

- 2.2.8 Create well designed buildings with active streets that respect their surroundings
- 2.2.9 Provide a street pattern linking one place to another, encouraging walking routes through areas.

2.3 Any regeneration scheme coming forward within the Regeneration Area should also aim to meet national best practice which sets out urban design objectives¹ for example:

- 2.3.1 **Character** - *To promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture*
- 2.3.2 **Continuity and enclosure** - *To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas.*
- 2.3.3 **Quality of the public realm** - *To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people.*
- 2.3.4 **Ease of movement** - *To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport.*
- 2.3.5 **Legibility** - *To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around.*

3.0 VISION

3.1 London is made up of unique places and districts, each with their own character and history. The redevelopment of an area with the scale and importance of the Earls Court Regeneration Area provides an exciting opportunity to build on an existing well-known name to create a substantial new part of London that can become a pleasurable destination for work, living, the arts and urban life.

3.2 Comprehensive development within the Regeneration Area will permit a holistic approach to sustainable development. Key elements of any proposals coming forward will be the ability to integrate transport and planning to reduce the need to travel and provide local jobs and recreation areas close to where people live within inclusive neighbourhoods.

3.3 The Earls Court Regeneration Area is currently an island; a super-block with broken frontages; fragmented urban form; few externally facing uses; and no walking routes through its core. Any regeneration scheme coming forward within the Regeneration Area provides the opportunity to repair and reinvent an underutilised and physically divisive land area currently dominated by ailing building stock and significant railway infrastructure and transform it into a desirable and significant London place.

3.4 The vision for the Earls Court Regeneration Area would be to seek to:

- 3.4.1 Provide an inspiring destination that builds on the established reputation of Earl's Court as a major attraction and is of a gravitas and quality commensurate with the ambition afforded by the Regeneration Area's characteristics;
- 3.4.2 Repair broken connections and the fractured urban form and deliver a comprehensive, unique, high quality rejuvenated cityscape that builds on the

¹ Page 15, By Design: Urban Design in the Planning System: Towards Better Practice, CABE/DETR 2000

character of the old and can become one of London's great metropolitan destinations;

- 3.4.3 Accommodate a development of significant scale and intensity which respects important qualities of local character and the quality of views into and out of the Regeneration Area along important local and metropolitan vistas;
- 3.4.4 Provide strong east-west connections between the London boroughs forging new pedestrian links via routes that are currently denied by the presence of the railway lines and the Earls Court exhibition halls;
- 3.4.5 Deliver an integrated public realm that is rich in beauty, diversity and landscaping quality, providing appropriate space for a range of activities to take place, supporting local, civic and cultural daily life with a major public square as the community focus and civic heart of the Regeneration Area;
- 3.4.6 Provide an attractive, legible, safe and secure environment ensuring appropriate transition between areas of domestic, public and commercial scale.

4.0 DESIGN

4.1 Design Opportunities

- 4.1.1 The Regeneration Area is currently marginalised by a number of physical constraints, primarily as a result of existing buildings and railway infrastructure. However this presents a range of interesting design opportunities that can inform the development of any future masterplan. The opportunities include;
 - (a) **Making use of topography** - *the level changes required to bridge retained railway infrastructure obstructions - generally grading down as one moves West from Warwick Road - means that a variety of levels can be designed into a new ground plane creating an interesting topographical street network, or a 'cloth of landscape' beneath which unsightly infrastructure, parking etc. can be concealed, thus improving the general attractiveness of the area and allowing buildings to sit on 'real' ground wherever feasible;*
 - (b) **Orientation** - *the relative elevation of the eastern portion of the Regeneration Area allows for views west across London and public spaces to be orientated to catch the sun throughout the day;*
 - (c) **Connectivity** - *the relative position of the existing underground stations and lack of coherent urban structure within the Regeneration Area allows future masterplan proposals to deliver appropriate street connections with the existing urban fabric based on natural desire lines.*

4.2 Design Principles

- 4.2.1 Consideration should be given to the development of proposals for the Regeneration Area that recognise its unique position (bounded by transit corridors and existing residential districts) and should seek to repair the fragmented nature of the urban form in this area, integrating new development seamlessly into a contemporary urban structure that better reflects the density of its metropolitan location and the intensity of the local urban morphology.
- 4.2.2 Design quality should be at the forefront in developing the masterplan for the Regeneration Area. Whilst there is an aspiration to deliver a place of metropolitan,

and therefore international, status there is also a need to ensure that proposals come forward that are locally appropriate. The scale of the Regeneration Area will demand a sensitive approach to design and construction.

4.2.3 Key to the success of any new development will be the ease with which the network of routes, spaces, landscape and infrastructure across the Regeneration Area can utilise the ground plane to connect into the local urban fabric.

4.2.4 Key design principles could include:

- (a) Establishing an appropriate density of development, concentrating higher densities and destination, commercial and metropolitan uses around major transport nodes;
- (b) Setting out a traditional street pattern hierarchy within a familiar language of urban grain that enhances pedestrian connectivity across the boroughs and makes the Regeneration Scheme an integrated part of the wider area rather than an isolated development site;
- (c) Developing entrances into the Regeneration Area and enhancing them around its periphery, the most significant of which would be the connection to Warwick Road, where the urban form allows for a gateway into the area which is at present occupied by the Earls Court exhibition halls;
- (d) Developing strong linkages to adjacent streets and local landmarks to generate the principle masterplan layout, repairing and improving existing 'broken' street frontages around the periphery of the Regeneration Area;
- (e) Providing active edges to the Regeneration Area boundaries and along publicly accessible routes within the Regeneration Area;
- (f) Placing residential buildings within a hierarchy of streets and squares and providing a mixture of dwelling types, tenure, and accommodation sizes;
- (g) Realising desire lines as major pedestrian boulevards between West Kensington, West Brompton and Earls Court stations, with their convergence determining the location of a new primary London square, which should become the 'heart' of the place;
- (h) Building on the best qualities of the locality around the edges of the Regeneration Area, which offer a diverse set of conditions between North End Road, Lillie Bridge Road, West Cromwell Road and Warwick Road. New uses could bind the Regeneration Area into these existing neighbourhoods by extending their influence into any new development;
- (i) Respecting the grain of the historic street patterns and outstanding building stock of the locale and seeking to develop urban form that reinforces the notions of continuity and enclosure, promoting continuous and unbroken street frontages, within perimeter urban blocks;
- (j) Concentrating areas of height around public transport nodes and potentially along the A4 corridor with a sympathetic scale and form of building and landscape design around the edges, with massing towards the core of the Regeneration Area which protects existing residential areas.

5.0 PLACE MAKING

5.1 Capitalising on Opportunities

- 5.1.1 Earls Court Regeneration Area already has the scale, accessibility and brand-name familiarity to be the home to major and minor destinations that would draw both from London and beyond. The relative accessibility the Regeneration Area and proximity to mass transit nodes makes it an ideal location for a metropolitan scale destination and a potential area for centering significant employment uses through the provision of a business/office district accessed off the A4/ West Cromwell Road corridor, with direct connections to the three surrounding underground stations.
- 5.1.2 In their current location the Earls Court exhibition halls (EC1 and 2) create an impenetrable barrier to movement across the Regeneration Area undermining any ability to create a strong gateway and new street connections between Warwick Road and North End Road or the local underground stations. As a key element of the rejuvenation of the broader Regeneration Area, the EC1 and 2 sites have a strategic role to play in the realisation of a comprehensive redevelopment; this is essentially the front door between the Earls Court station area of RBKC and the body of the Regeneration Area to the west in LBHF and is the key to the physical unity of the boroughs in this area.
- 5.1.3 The potential benefits of providing an International Convention Centre (ICC) within LBHF are acknowledged and (as explained in more detail in other studies) it is considered that the Olympia site represents the best-fit location given its connectivity, brand associations and proximity to complementary and ancillary products and services (such as hotels, retail, catering and offices).
- 5.1.4 Locating an ICC at Olympia would enable a masterplan to capitalise on opportunities to create a strong connected new place. Design considerations which do not support a potential ICC at the EC1 and EC2 location include:
- (a) Any potential ICC building is likely to be a complex and demanding building, with very particular requirements for site area, servicing, transport access, visibility, associated open space, security and other considerations. It is a building which needs to sit well with its neighbouring development. Conference and exhibition centres typically have long blank walls and significant servicing requirements which result in a big "back" that need to be carefully planned with adjacent uses. These challenging aspects of any potential ICC building would not be easily overcome on the existing EC1 and 2 sites, where blank frontages will be hard to design around and where there is the most complex pattern of Underground and Overground lines.
 - (b) As noted, a key design principle is to provide enhanced connectivity. In particular, the ability to create east-west connectivity between Warwick Road and North End Road is a major potential benefit. This key movement is currently blocked by the necessarily "secure/private" nature of the Earls Court buildings, and any ICC development on the same site would have similar challenges and would do nothing to remove this detrimental blockage to east-west permeability;
 - (c) A key design principle is for the existing EC1 and 2 sites to be utilised going forward to allow a better "scale transition" to the wider development to be appropriately planned. The scale transition is currently abrupt, from existing townhouses with gardens to service roads and the expansive, blank walls of

EC1 - effectively a 'black box' structure. By introducing a potential ICC here the opportunity for significant visual improvement is much more limited;

- (d) The area immediately west of Warwick Road is crossed by a complex network of underground tunnels, which create design and build constraints in relation to the construction of a modern ICC building with the potential for acoustic and vibration problems.

5.2 Public Realm

- 5.2.1 The ambition for the public realm should be to generate innovative, high quality and sustainable urban landscape design, blending green and hard spaces, along with zones devoted to promoting urban ecology, helping to create a memorable destination and much loved local places with open space employed as a means of promoting locally distinctive development form, character and culture.
- 5.2.2 As noted, a major new London public square could be provided as a focus of the new place, amongst a broader range of open space provision. It would be fitting for the design principles for the primary square to reflect the established tradition Earls Court has as a place of exhibition, celebration and entertainment, providing for example, flexible congregational space suitable for public events, street theatre, concerts, galas, markets, shows, sculpture, media screens, interactive landscape, eating and dining, along with places to sit, play, and relax. Any significant destination attraction proposed for the Regeneration Area should be located appropriately in relation to this major open space. Other quarters of the Regeneration Area could feature their own open space, with a character appropriate to the surrounding uses.
- 5.2.3 Street life and building use distribution should encourage an appropriate level of activity to support busy or quiet spaces. Ground level frontages along public routes should avoid blind facades and be designed to animate the street scene.
- 5.2.4 Key design principles underpinning the masterplanning of the public realm may include:
 - (a) Offering a hierarchical network of streets, squares and open space provision, with clearly defined public and private areas ranging from a major focal 'London' square and local gateway and perimeter squares to private amenity spaces providing variety in street widths, proportions and levels of activity dependent upon intended use;
 - (b) Seeking to encourage broader pedestrian and cycle movement across the Regeneration Area improving links between RBKC and LBHF and any existing local amenities including the possibility of a green link to West Brompton Cemetery which could provide a strong connection to what is already a cherished community asset;
 - (c) Exploring opportunities for complementary public realm landmarks aiding orientation and facilitating the transition between new and existing development, for example in linking the Regeneration Area to Warwick Road;
 - (d) Ensuring spaces have a direct relationship with the buildings that they address and, in turn, the buildings should offer appropriate surveillance to make such spaces feel safe and comfortable for their patrons;

- (e) Considering lighting, signage and street furniture as an integral component of the architectural and public realm design, arranging them to minimise clutter and physical and visual intrusion;
- (f) Designing a streetscape planting strategy to enhance visual 'greenness' and to increase urban tree canopy/coverage to help mitigate the impact of the thermal heat island effect.

6.0 CONCLUSION

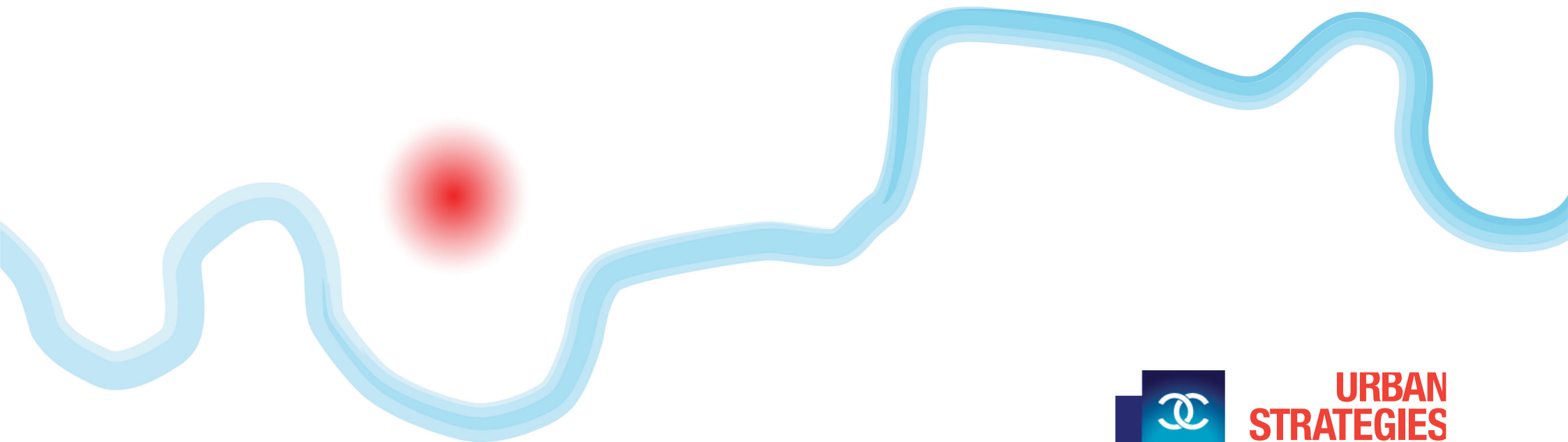
6.1 Earls Court Regeneration Area is currently an island characterised by broken frontages, a fragmented urban form and no walking routes through its core. What is more, the existing exhibition halls present a significant barrier to enhancing connectivity between the boroughs and capitalising on the opportunity to establish an important gateway to the Regeneration Area.

6.2 Using sound principles of design to inform the Masterplanning processes the Earls Court Regeneration Area provides the opportunity to:

- 6.2.1 repair and reinvent an underutilised and physically divisive land area currently dominated by ailing building stock and significant railway infrastructure and by building on an existing well-known name transform it into a well designed, desirable and significant London place with a vibrant public realm.
- 6.2.2 build on and promote the connectivity of the Regeneration Area with its proximity to Earls Court, West Kensington and West Brompton stations (along with the adjacent A4/West Cromwell Road) and develop strong linkages to adjacent streets and local landmarks to create a well connected hub.

Earls Court

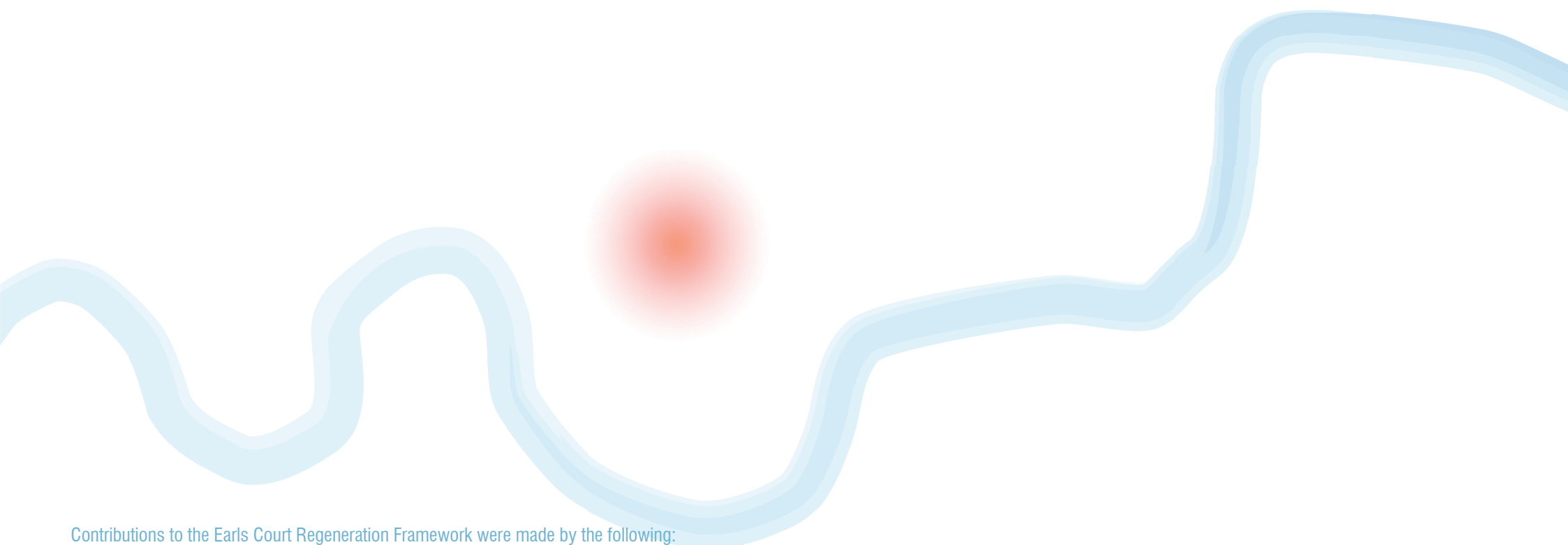
Regeneration Area Framework



June 2009



**URBAN
STRATEGIES
INC .**



Contributions to the Earls Court Regeneration Framework were made by the following:

Arup
King Sturge

DP9

Gardiner & Theobald
Kohn Pedersen Fox Associates

Halcrow

Hoare Lea
WSP

Earls Court Regeneration Area Framework

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Earls Court Regeneration Area Framework

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The Earls Court Regeneration Area

is a unique, large area in West London whose redevelopment provides a major opportunity to contribute to the long-term economic growth of London and to the regeneration ambitions of the boroughs in which it sits.

The area has great accessibility. It is directly served by three Underground and one Overground stations, as well as numerous bus services. It is adjacent to major road and rail infrastructure, including connections to Heathrow airport. To the immediate west of Central London, the Earls Court Regeneration Area can be home to development of the scale and complexity necessary to provide expansion room for the great business, cultural and residential attractions of that sector of the capital, while supporting the regeneration and enhancement of adjacent areas. It is an area of strategic importance to the future economy of London, at the apex of the dynamic Western Wedge along the M4.

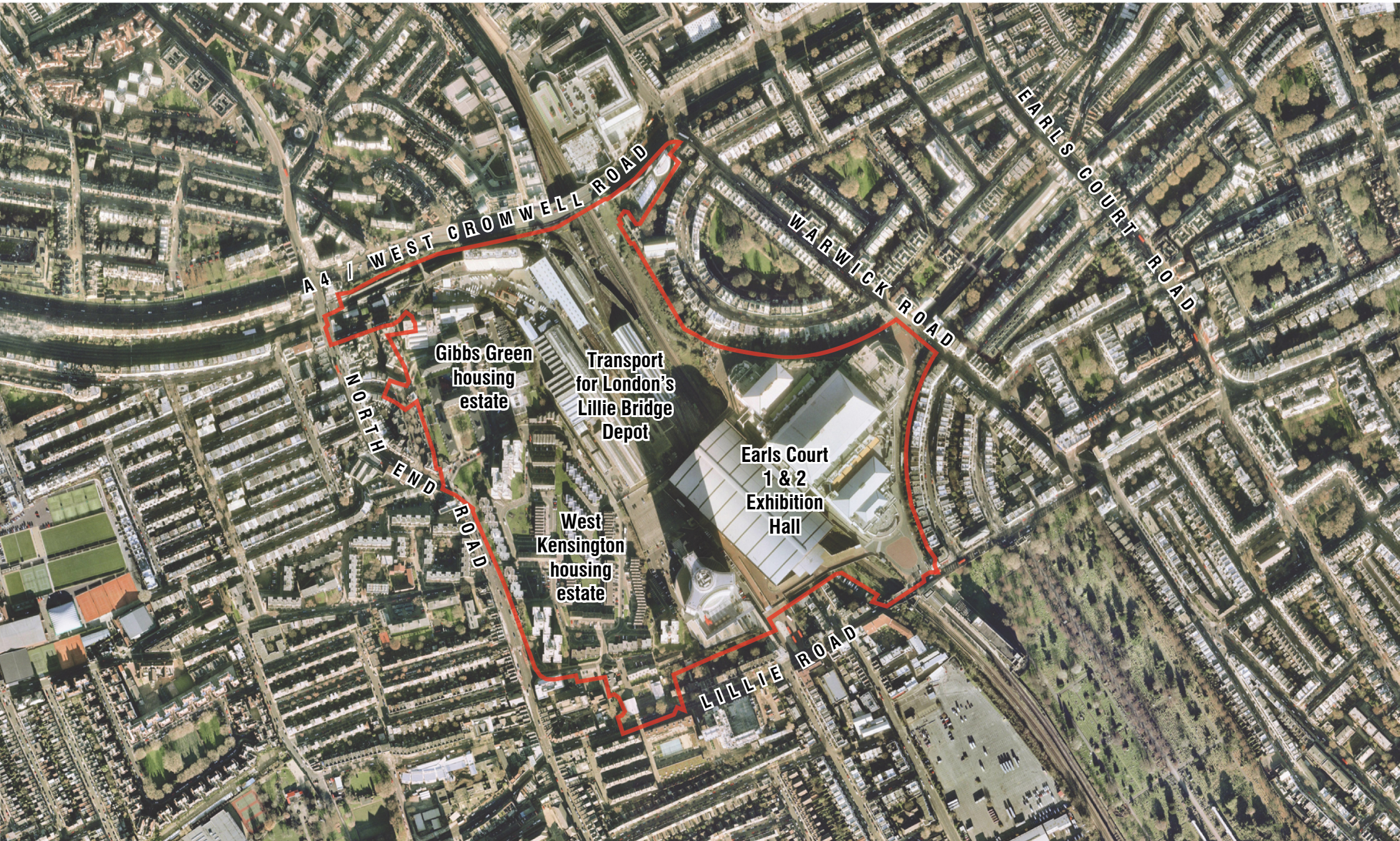
Redevelopment of the Earls Court Regeneration Area can also be a catalyst for a comprehensive regeneration strategy at the borough level to broaden the housing mix, create a greater socio-economic balance and provide more training and employment choices,

establishing a ladder of opportunity for all local residents. Unlike many large sites, the lands within the Earls Court Regeneration Area are owned by a small group of public and private owners, simplifying the development process, facilitating integration of physical and socio-economic regeneration and linking public objectives with private delivery.

From a market perspective, notwithstanding current unsettled conditions, potential for a major redevelopment at the Earls Court Regeneration Area is strong. Substantial office, residential, hotel and retail demand exists for the medium and long-term timetable of its development. Earls Court is a well-known feature of London, already with a distinct brand identity. The market background, remarkable attributes and the primacy of metropolitan and local regeneration objectives collectively suggest a substantial development of significant intensity. All such imperatives must however be set within the overall goal for the area – to create a great new place in London and an encouraging new presence in the boroughs.

This document details the metropolitan ambitions, area regeneration objectives and market context for the Earls Court Regeneration Area. It sets out 11 key economic, physical and community regeneration objectives for successful redevelopment and identifies their transport and design implications. It concludes with a series of detailed principles that comprise a Framework for the Earls Court Regeneration Area.

Figure 1.1 Earls Court Regeneration Area



1.0

Introduction to the Framework

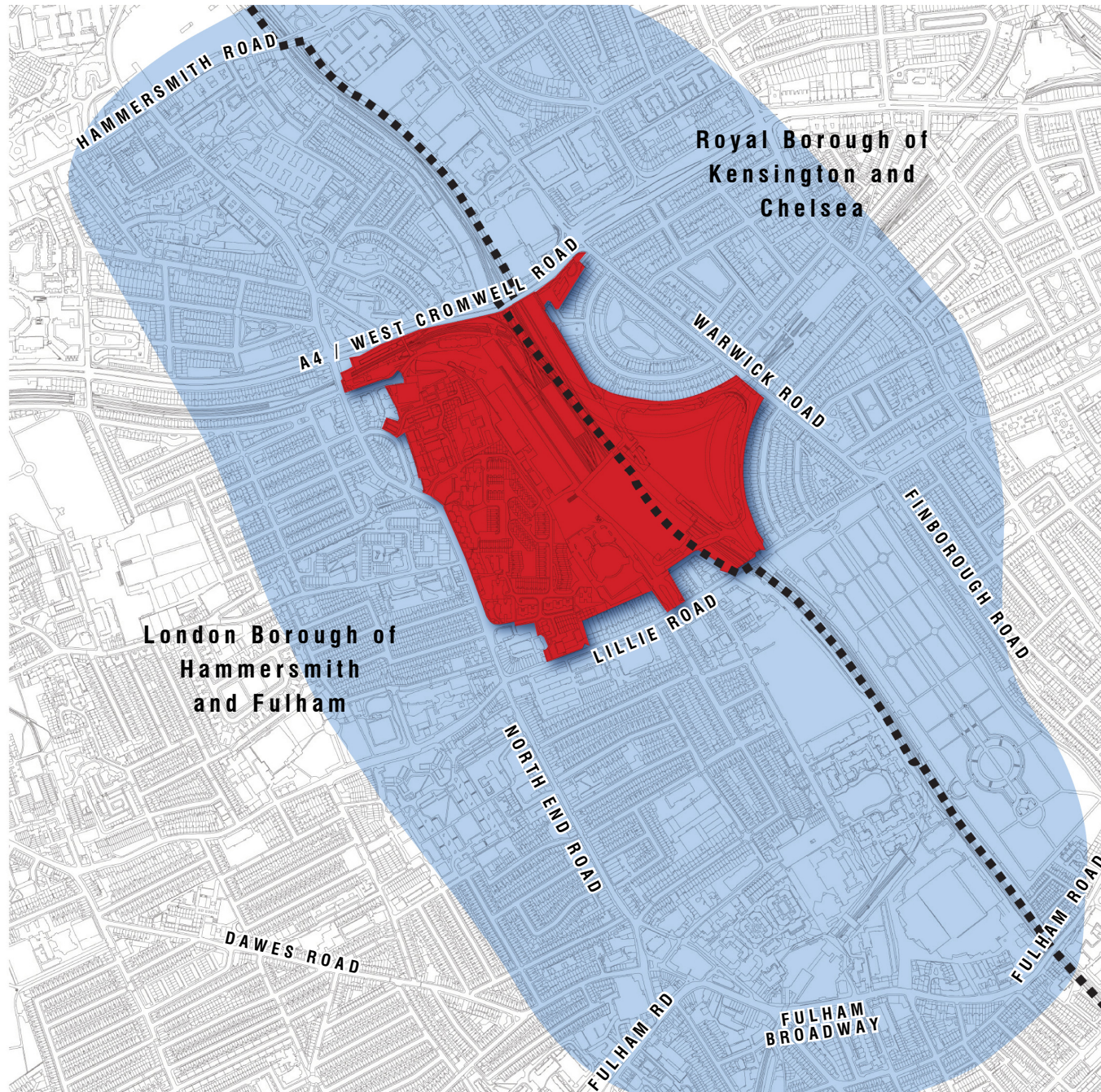
1.1 The Purpose of the Framework




The Framework is a strategic document that considers the direction for the renewal of the area referred to in this report as the Earls Court Regeneration Area. Situating the redevelopment of the Earls Court Regeneration Area and its surroundings in the context of London's ongoing development and growth, the Framework presents the strategic rationale for realising the opportunity and potential of the Regeneration Area as a new mixed use district in the capital. It supports a comprehensive mixed-use redevelopment that responds to both London's needs and to the needs of Hammersmith and Fulham and Kensington and Chelsea.

The Framework sets out high level objectives and principles that will allow for a clear and comprehensive approach to the planning of the Earls Court Regeneration Area, while being sufficiently flexible to respond to the changing priorities and market conditions likely to occur over its extended development period. The focus of the Framework is on shaping a new and enduring element of London's physical, economic and social structure, rather than on fashioning a specific development.

The Framework is intended to establish objectives and principles for development of the Regeneration Area, building on the existing Greater London Authority (GLA) (see Appendix 1) and Borough policies which provide guidance for an area of this importance and location. The Framework provides more detailed guidance specific to the Regeneration Area and its evolution. The potential for major redevelopment and regeneration has been highlighted by the area's landowners and both the London Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea are currently considering new policies to recognise the potential of the Regeneration Area through their new local development plans, now known as Local Development Frameworks (LDFs). Kensington and Chelsea's *Towards Preferred Options* publication for their LDF identifies Earls Court as a Major Development site, appropriate for major mixed use development, either office or residential led, and a possible area for tall buildings. Hammersmith and Fulham's *Core Strategy Options* document also supports a comprehensive mixed use development, designed as a vibrant world class quarter of London.

Figure 1.2 Framework area in its local context



-  Earls Court Regeneration Area
-  Framework Plan local context area
-  Borough boundary

1.2 The Regeneration Area and its Context

The Framework study area is located at the western edge of Central London and spans the boundary of the Boroughs of Hammersmith and Fulham and Kensington and Chelsea.

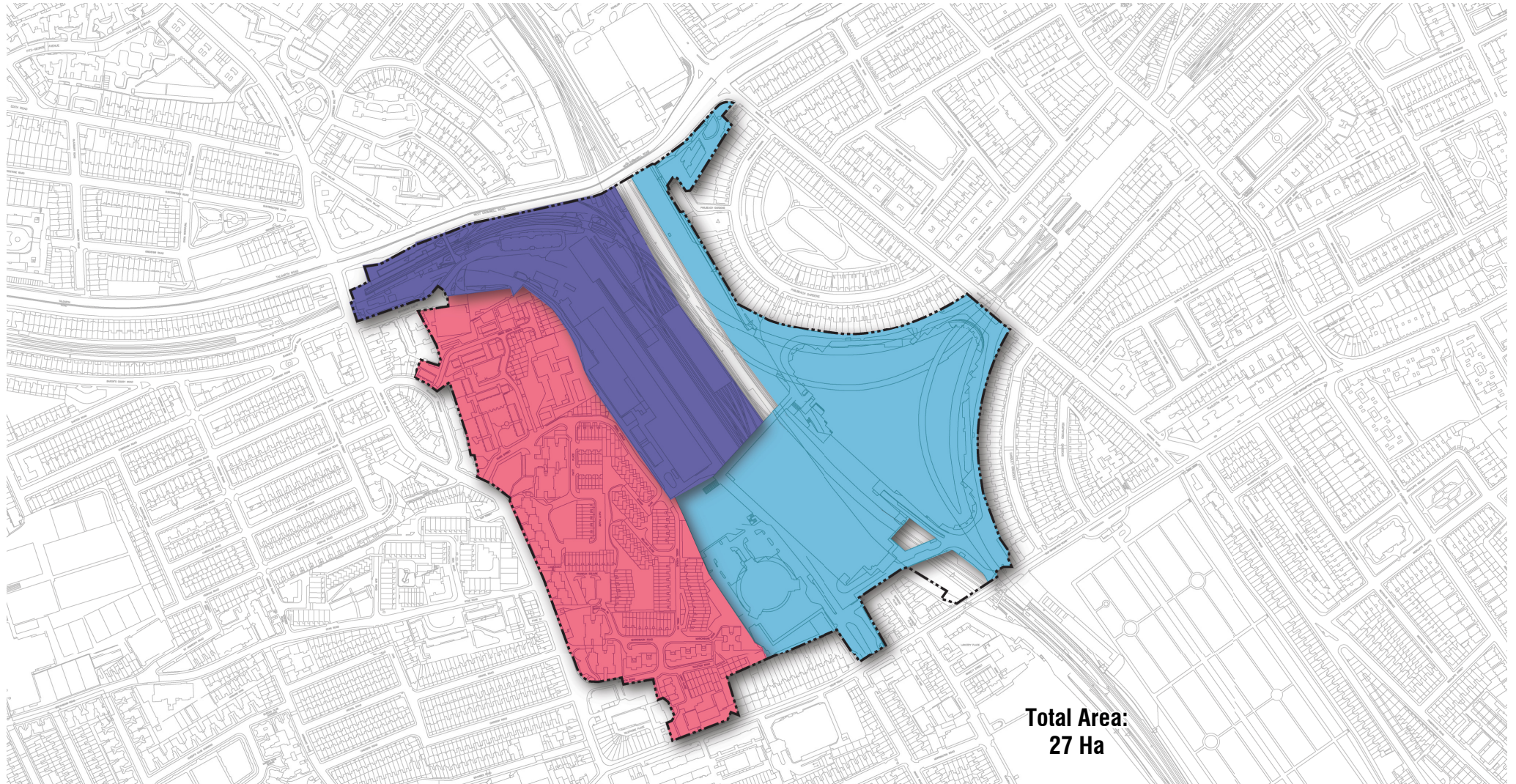
The geographic focus of the Framework is the Earls Court Regeneration Area (see Figure 1.2: Framework area in its local context). Totalling over 27 hectares, the primary area of focus takes in the lands bounded to the east by Warwick Road, to the south by Lillie Road, to the west by North End Road and the western boundaries of the West Kensington and Gibbs Green housing estates, and by the A4 / Talgarth Road / West Cromwell Road corridor to the north.

The Regeneration Area is currently comprised of three main zones of activity:

- Earls Court 1 and 2 Exhibition Halls and their related infrastructure
- Transport for London's (TfL) Lillie Bridge Depot
- West Kensington and Gibbs Green housing estates overseen by the Borough of Hammersmith and Fulham

The Earls Court Regeneration Area sits within a wider study area extending south to Fulham Broadway, west to include the housing estates west of North End Road, east to Earl's Court Road, south to Fulham Broadway and north to Olympia. It is this wider study area that would be expected to be the most affected by, and benefit from, the development of the Regeneration Area.

Figure 1.3 Ownership distribution



CapCo
Capital & Counties

TfL
Transport for London

LBHF
London Borough
of Hammersmith
and Fulham

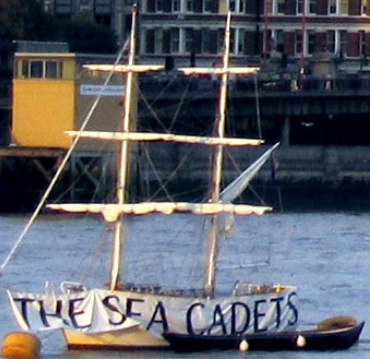
1.3 Land Ownership

The Boroughs of Hammersmith and Fulham and Kensington and Chelsea recognise the opportunity for substantial new development that would create a great place for the benefit of local residents, workers and visitors from elsewhere. They also recognise the opportunity to extend these benefits beyond the boundary of the Regeneration Area to the neighbourhoods and districts beyond.

The Framework establishes how the Regeneration Area, under the primary ownership of three organisations, could be redeveloped to the benefit of stakeholders. The area falls under the principal ownership of the following parties and their respective holdings each represent approximately one third of the area:

- Earls Court and Olympia Limited (led by Capital & Counties), owner of Earls Court 1 and 2 Exhibition Halls
- The Borough of Hammersmith and Fulham, owner of the two housing estates
- TfL, owner of the Lillie Bridge Depot

The result is an area large enough to achieve multiple objectives and which could have significant benefits, at not only the local but also the metropolitan level. Through this approach, the area can be planned comprehensively, with future phases of work adding detail to ensure a logical approach to design, infrastructure provision and phasing.



2.0

The Opportunity for London

2.1 London is Growing

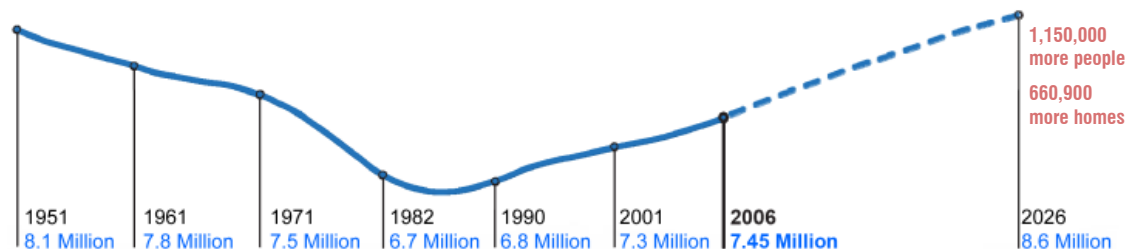
Opportunity #1: London is a world city that will continue to grow and require new spaces, a need which the Regeneration Area can respond to.

Earls Court Regeneration Area is strategically located, large enough to be of London-wide significance and contribute to both metropolitan and Borough objectives, particularly in its ability to accommodate the health of the capital's economy and to accommodate its renewed population and job growth.

Following a period of population decline from the 1950s through the late 1980s, London is once again experiencing significant levels of population increase. The capital has added over one million people during the past two decades. This upward trend is expected to continue, with the population exceeding levels last reached in the 1950s. Current expectations see it rising to between 8.3 and 8.6 million by 2026 according to King Sturge Research.

This growth will translate into a need for new homes and workplaces. The capital will require 660,900 new homes by 2026.¹ It will also need 380,000 more jobs or approximately 7.6 million sq. m. of additional employment space.² With this level of growth anticipated and a robust longer term outlook for the economy, the expectation is for London to continue strengthening its position as a world city that is a leader in business, financial services and tourism.

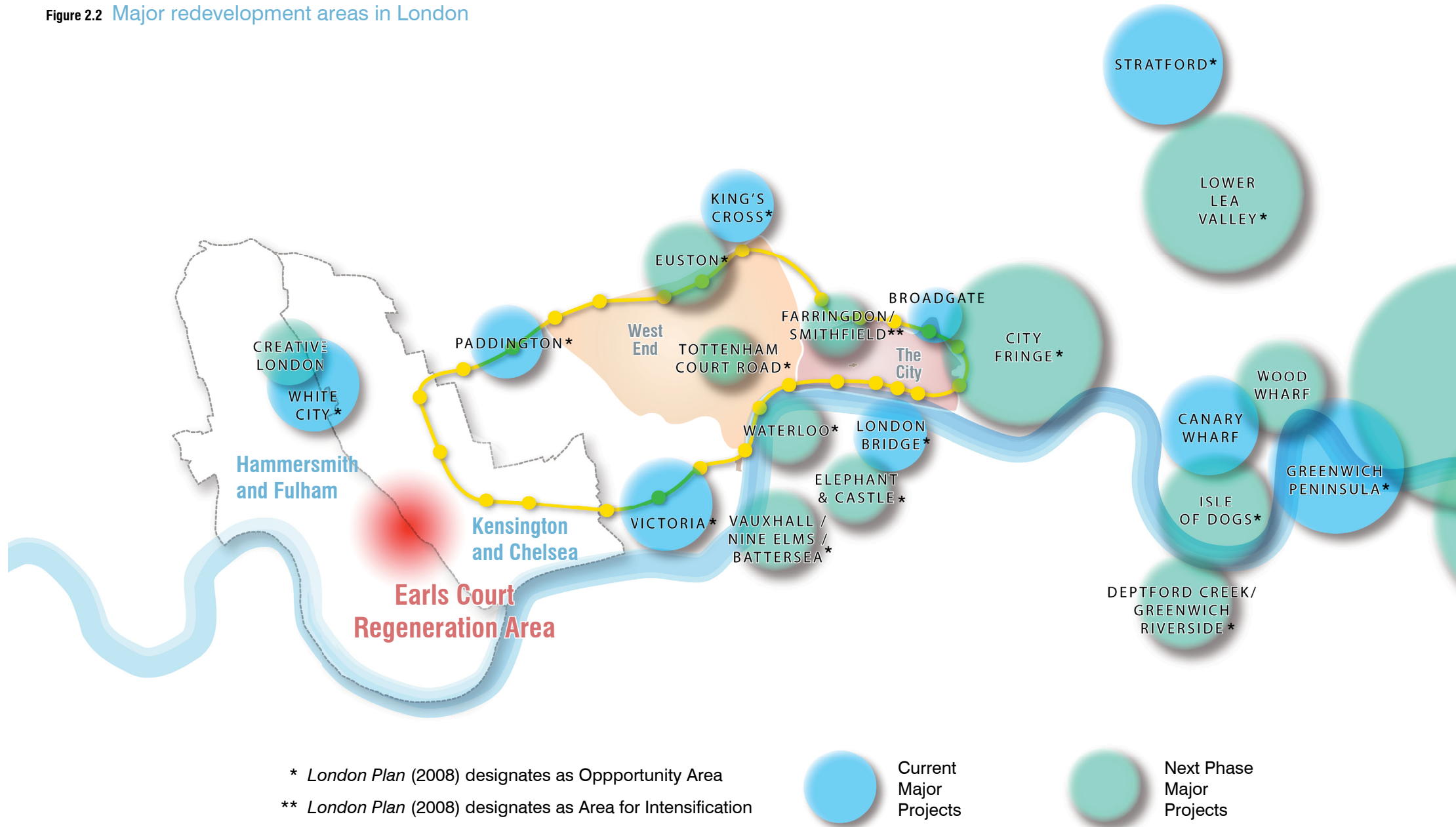
Figure 2.1 London's growth



¹ The requirement for 366,800 homes identified in the *Greater London Strategic Housing Market Assessment 2008* is carried forward an additional nine years to give an indication of what the need could be in 2026.

² Based on 20 sq. m. per employee as a general employment density.

Figure 2.2 Major redevelopment areas in London



2.2 Limits to Strategic Growth and Redevelopment

Opportunity #2: There are few sites in London that can accommodate substantial new development that will significantly contribute to the capital’s needs, making the Regeneration Area one of strategic importance.

To sustain these rates of growth, a significant number of major locations where new jobs and homes can successfully be provided will be required. The *London Plan* sets the spatial strategy and policy context for how and where growth is to be accommodated. As part of the review of the *London Plan* now underway, the following vision for the capital’s future development has been put forward:

To ensure that over the years to 2031, London excels among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century.

Implementation of this vision will be guided by the following six objectives which seek to ensure London is:

- A city that meets the challenges of economic and population growth
- An internationally competitive and successful city
- A city of diverse, strong, secure and accessible neighbourhoods
- A city that delights the eye
- A city that becomes a world leader in improving the environment
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities

To meet such objectives and achieve the vision proposed, a continuing supply of large sites is required to accommodate a mix of uses at higher intensities, with high levels of service by public transport and other infrastructure that are key to ensuring long-term sustainability.

Historically, the area contained within the Circle Line has been the focus for major developments seeking a central location. Having experienced significant levels of new development in recent decades, this area of the capital is nearing capacity and unable to accommodate further major development. As a result, growth is now being pushed to the edges of central London – to the Isle of Dogs, London Bridge, City Fringe, Paddington, Kings Cross, Euston and other locations (see Figure 2.2: Major redevelopment areas in London). Significantly, most of these areas available for major development activity are located to the north, east and south of central London’s prime business and residential areas. With the exception of the Earls Court Regeneration Area, very few large, well-located sites exist in West London.

Figure 2.3 London context and major road network

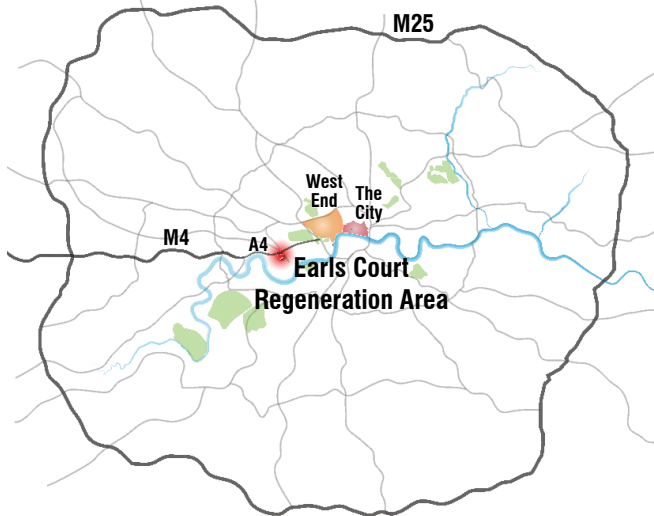
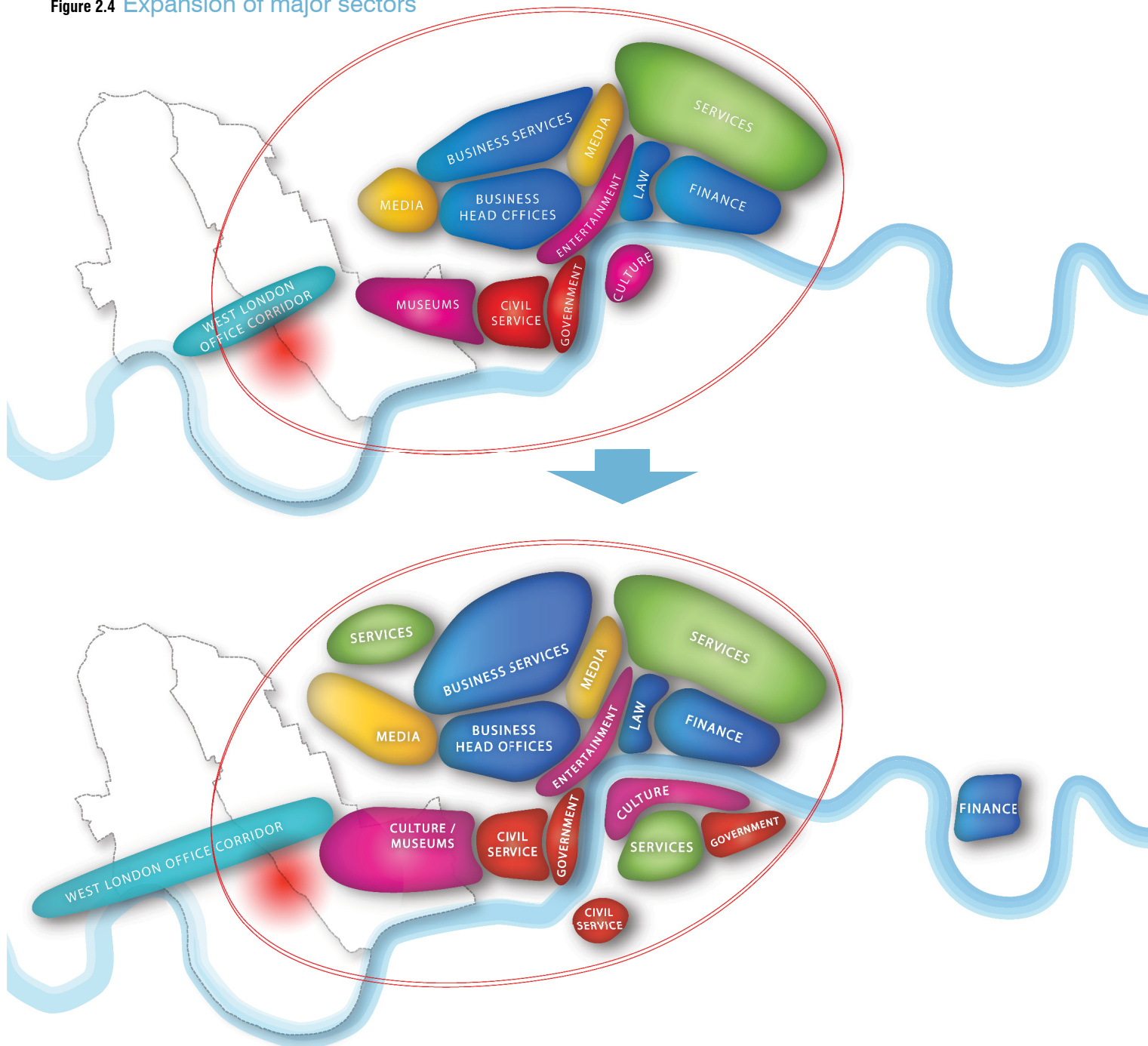


Figure 2.4 Expansion of major sectors



London's Shifting Economic Geography

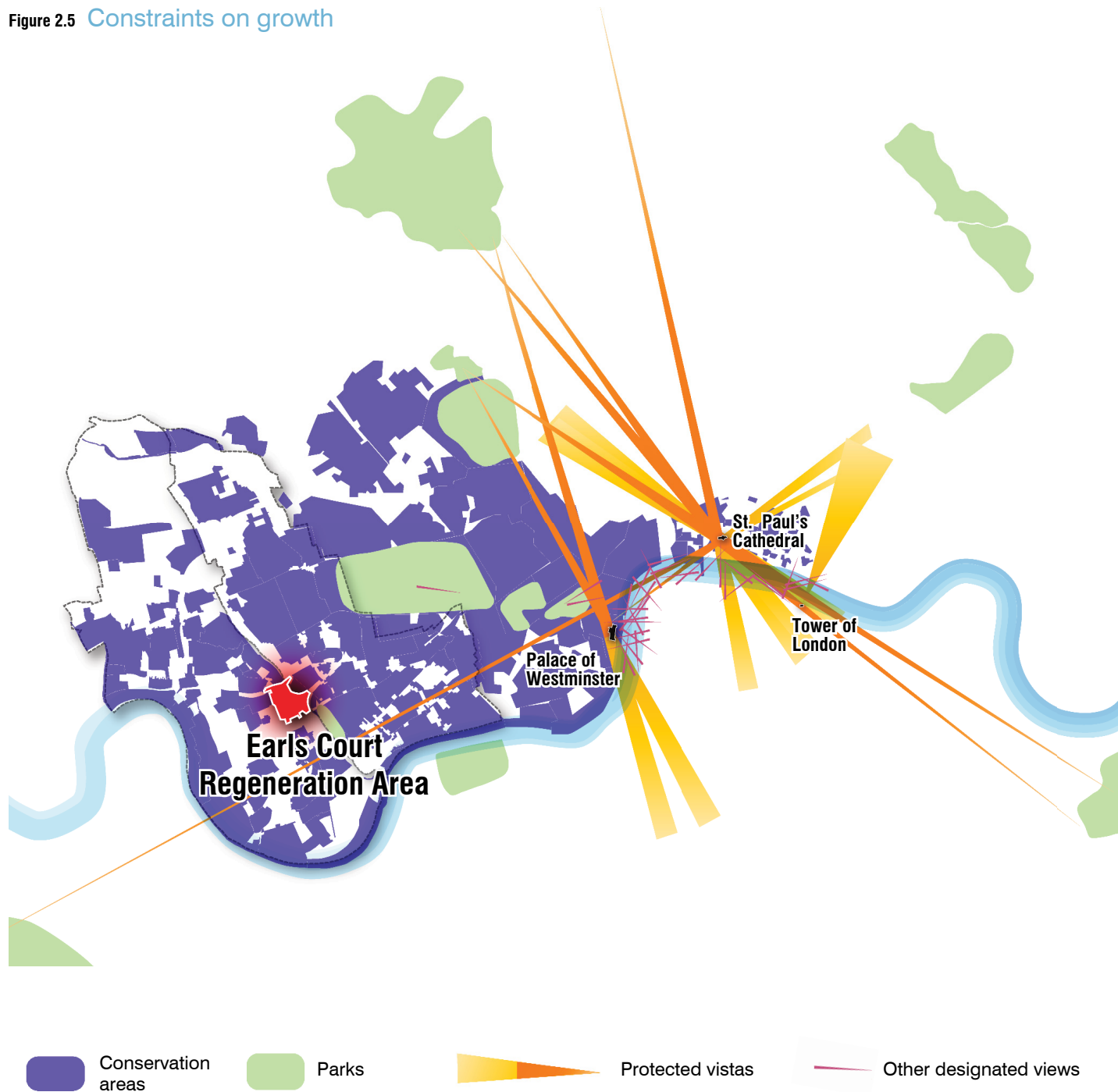
Opportunity #3:

London's economy continues to require new and innovative forms of accommodation in a variety of locations.

Major economic sectors are expanding to areas beyond those with which they are traditionally associated – finance from the City to Canary Wharf, arts and culture from Knightsbridge and South Kensington to the South Bank. The West London corridor is becoming an increasingly important office location. With fewer sites available in central London, new areas suitable for expansion needs are being sought. In some cases, the evolution of the sector is requiring a new or more varied type of space for its particular activity.

The office towers of Canary Wharf, for example, offer a different type of accommodation to historic buildings in central London. Unique and special redevelopment opportunities can provide new facilities that allow a sector to expand and add a new offering to its users.

Figure 2.5 Constraints on growth



Constraints on Growth

Opportunity #4: The Earls Court Regeneration Area is not impacted by many of the constraints to growth found in other parts of London.

Alongside the *London Plan* policies are a number of other factors which significantly constrain where growth can occur.

The ability of the capital to accommodate developments of a significant scale is restricted by various strategies and policies intended to protect the physical features that contribute to London's unique character. Many of these – the Royal Parks, view corridors to historic buildings and along the River Thames, conservation areas – mean that larger scale redevelopment projects are not possible in much of central and west London.

It is in this context of continued dynamic growth and constrained development opportunities, particularly in West London, that the Earls Court Regeneration Area represents a unique development opportunity that could meet the capital's planning objectives and accommodate the space requirements of the great engine of the London economy. It is a strategically significant location.

2.3 The Economic Opportunity

To quantify the scale of future demand for space to house this employment, residential and related growth, analysis has been undertaken of the historic and anticipated performance of the London economy over the past and the next two decades and of the associated population projections.³ While such projections inevitably contain a number of variables and assumptions, and present unsettled market conditions can generate understandable skepticism, it should be understood that the trends on which the analysis is based find their origins in the 1980s and have extended through at least two economic cycles since then.

The strong levels of long-term population and job growth for London translate into a strong market through the delivery of the Earls Court Regeneration Area project, which would not commence construction until after 2012. The forecast levels of demand for new space throughout London in all sectors – office, residential, retail, convention and hotel – are outlined below.

³ King Sturge Research

Office Demand

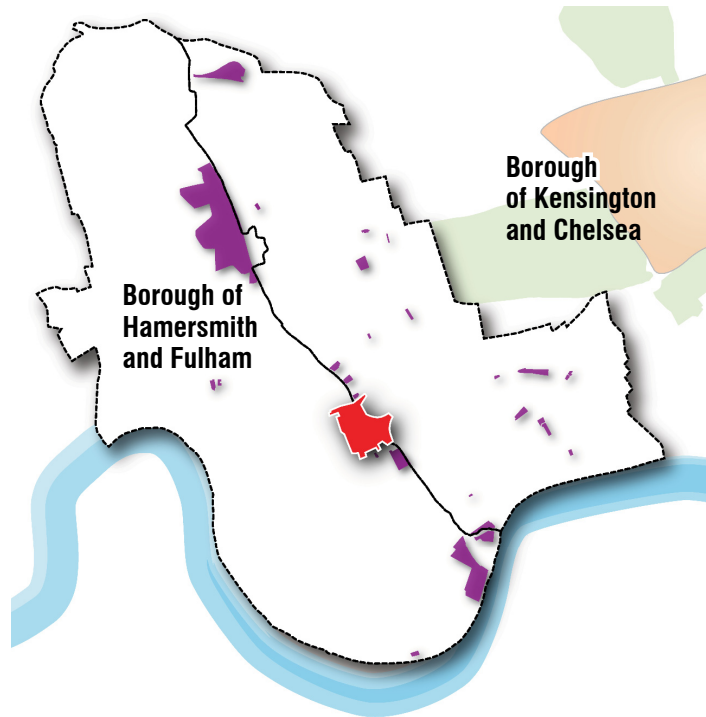
Opportunity #5: London's role as a global business centre for a range of activities, including business services, finance, insurance, creative industries, technology and telecoms, creates a long-term need for new office accommodation.

Notwithstanding current economic conditions, expectations are for improved office employment demand prior to delivery of the Earls Court Regeneration Area project. Looking forward over the next two decades to 2026 and beyond, the renewed strength of the office market is expected to result in a requirement for 2.9 million sq. m. of new office space in London.

A range of users – business services, finance, insurance, creative industries, technology and telecoms, corporate head offices, all characteristically more West End users – are anticipated to drive demand for office space. The majority of the speculative office space currently under construction will be completed prior to 2015. This may serve to intensify the shortage of Grade A space available, particularly in the West End, a part of town which has recently had high rates of take up. A shortage of available, well serviced, large sites suitable for high quality offices, particularly to the west of Central London, will be increasingly evident over the next decade, as the ring of 'railway station' sites is developed. The next wave of large sites are primarily to the east, north and south of the centre, further out from the Circle Line and are generally not conceived as being major office employment areas.

The Earls Court Regeneration Area will therefore have a critically important role to play in ensuring the continued supply of office space for the capital, serving the expansion of the business sectors vital to its long-term economic future. As the *London Plan* review acknowledges, a city of the global significance of London requires for its success many large business-appropriate development areas to ensure a varied portfolio of opportunities for different office users in different quarters of the city well into the future. The Earls Court Regeneration Area is just such an area.

Figure 2.6 Major development sites (as per UDP)



Residential Demand

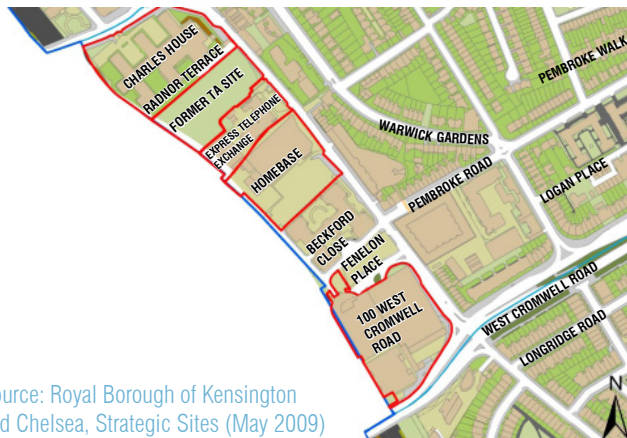
Opportunity #6: London has an on-going need for new quality housing at affordable prices that can meet a range of lifestyle and lifestage needs.

Notwithstanding current market conditions, London, and the wider South East, is experiencing an ongoing challenge of undersupply of housing. Continued population growth and decreasing household size are sustaining the need for more housing. The current *London Plan* seeks a minimum target for housing provision of 30,500 additional homes per year (Policy 3A.1). Targets for the construction of new housing at the national, regional and sub-regional scales have been established to meet this ongoing need and ensure that the regeneration of available land, especially brownfield and government-owned sites, is contributing to housing development. The draft *London Housing Strategy* (May 2009) by the Mayor of London sets out a vision for moving beyond targets, ensuring not just more homes but a better mix of types and tenures of homes at prices more Londoners can afford.

Reflecting the overall growth of London, Hammersmith and Fulham and Kensington and Chelsea are both expected to experience strong continuing population growth, and therefore housing need. Like all London boroughs, the Councils have established housing targets to meet by 2016.⁴ A simple extension of those targets gives the following housing requirement for the two boroughs over the course of the redevelopment of the Earls Court Regeneration Area to 2026:

⁴ The housing targets are expected to remain in place until new direction is provided through the *London Plan* review.

Figure 2.7 Warwick Road Strategic Site



Source: Royal Borough of Kensington and Chelsea, Strategic Sites (May 2009)

Figure 2.8 Population and housing projections

Borough	Additional Population by 2026 ⁵	Additional Housing Units required by 2026 ⁶
LB Hammersmith and Fulham	21,100	12,350
RB Kensington and Chelsea	13,700	6,650

Both Boroughs are currently in the process of preparing their LDFs. As part of this work, they have identified sites likely able to accommodate their immediate housing targets to 2016/17. The supply of land for such future residential demand is quite constrained, with some exceptions. Kensington and Chelsea have identified the Warwick Road corridor, immediately north and east of the Regeneration Area, as a Strategic Site capable of making a contribution to meeting the Borough’s housing target (see Figure 2.7: Warwick Road Strategic Site). Other than the Regeneration Area, sites are small and many are located within built-up areas which restrict their scale of development.

Looking beyond the term of the current *London Plan* and the 2016/17 threshold currently set in the LDF Core Strategy consultation documents, this Earls Court Regeneration Area Framework could ensure a long-term supply of residential land, over a large area, where a range of different housing forms, tenure types and household sizes can be accommodated – all key housing aspirations for both Boroughs. Based on historic sales trends and expectations for population growth, it is estimated that the area’s potential residential demand could be between 9,000 and 10,000 units. It is clear that the Earls Court Regeneration Area could have a uniquely important role in meeting the Boroughs’ medium and long-term housing ambitions.

⁵ King Sturge Research

⁶ Hammersmith and Fulham housing projections from *Hammersmith and Fulham Housing Strategy 2007-2014: A Housing Ladder of Opportunity For All*. Kensington and Chelsea housing targets from GLA *The London Plan Consolidated with Alterations since 2004* (February 2008).

Retail Demand

Opportunity #7: Continued population growth and the introduction of new residents to the Regeneration Area will create additional need for retail facilities that are complementary to existing designated retail centres.

Additional retail services of all types and sizes will be required to support London's expanding population. *London Plan* Policy 3D.3 advises that Boroughs should provide a policy framework for monitoring, managing and enhancing local and neighbourhood shopping facilities and, where appropriate, for the provision of further such facilities in accessible locations, including to serve new residential communities. Forecast increase in latent demand – population growth and consumer spending growth of 123% between 2007 and 2025 (at 2007 prices) – is expected to create an overall need for approximately 920,700 sq. m. of retail accommodation by just 2016.⁷ This is in addition to the known major new retail developments at White City and Stratford.

Redevelopment of the Regeneration Area for intensive office and residential development will in turn generate a significant additional retail demand, which can be served both by the important retail centres at Fulham Broadway and Earl's Court Road and in the Regeneration Area itself. Based on per capita retail spend (combined total convenience and comparison), new residents alone could generate an estimated £184 to £243 million in retail demand. Those working in the Regeneration Area could add a further £219 to £356 million.

⁷ Experian for the GLA, London Town Centre Assessment: Stage 1: Comparison Goods Floorspace Need (2004).

International Convention Centre Demand

Opportunity #8: The Greater London Authority has been exploring for some time the creation of an International Convention Centre (ICC) in central London. The Borough of Hammersmith and Fulham is exploring the possibility of locating an ICC within its boundaries, with a scheme(s) involving development/redevelopment of Olympia and Earls Court complexes being examined.

An objective of the current London Plan is to bring forward a major international convention centre (ICC) (Policy 3D.7) and the Borough of Hammersmith and Fulham is exploring the possibility of locating such a facility within the borough. London is an international destination for business tourism, an industry that is worth in the neighbourhood of £3.2bn to the capital's economy⁸; however, as a globally competitive city, London lacks one feature that would be expected of a city of such stature – a high quality, purpose built convention centre of international repute. ICCs are often purpose-built venues offering a range of rooms and spaces including tiered auditoriums, meeting spaces, exhibition areas, break-out rooms, and catering and restaurant facilities with a variety of complementary uses such as hotels, restaurants and leisure and entertainment in close proximity.

In 2005, the Mayor's International Convention Centre Commission reported on the need, market case and feasibility for an ICC in London. London's position in the rankings of destinations for large international events declined from the number one position in the 1970s to the 19th position by 2005. In 2003, 15 out of the 17 existing venues turned away business equivalent to some 90,000 delegate days due to inadequate facilities. While the city is popular for business tourists and international business visitors and the convention industry sees it as having strong destination appeal, only 20% are satisfied with the current facility offer. 80% reported they would be likely to hold events in London should a new, larger ICC be available.⁹

⁸ International Convention Centre Commission

⁹ Ibid

The London Borough of Hammersmith and Fulham is promoting schemes, including development / redevelopment of the Olympia and Earls Court complexes, as possible locations for the ICC. The proposition is that it could strengthen the area's brand, leverage off its accessibility by rail, generate additional discretionary spend to local businesses and bring new employment opportunities to the area. The feasibility, viability and impact of an ICC as part of a scheme including the development / redevelopment of the Olympia and Earls Court complexes require further analysis; however, the analysis completed by the ICC Commission indicates the scale of the opportunity.

Hotel Demand

Opportunity #9: International visitor nights in London are on the rise and the Regeneration Area presents an opportunity to cater for visitor demand for hotel and related leisure uses.

The capital's hotel market will be driven by an existing under supply in hotel stock and increasing visitor numbers. The *London Plan* is seeking to achieve 40,000 net additional hotel bedrooms by 2026 (Policy 3D.7). With international visitor nights alone increasing by 2.4% annually between 2007 and 2026, up to 2,000 additional hotel rooms will be needed every year. The largest growth is expected to be in Central and West London, with 750 and 500 rooms required annually.¹⁰

¹⁰ Grant Thornton and The Leisure & Tourism Organisation for the Greater London Authority, Hotel Demand Study (June 2006).

2.4 Why West London?

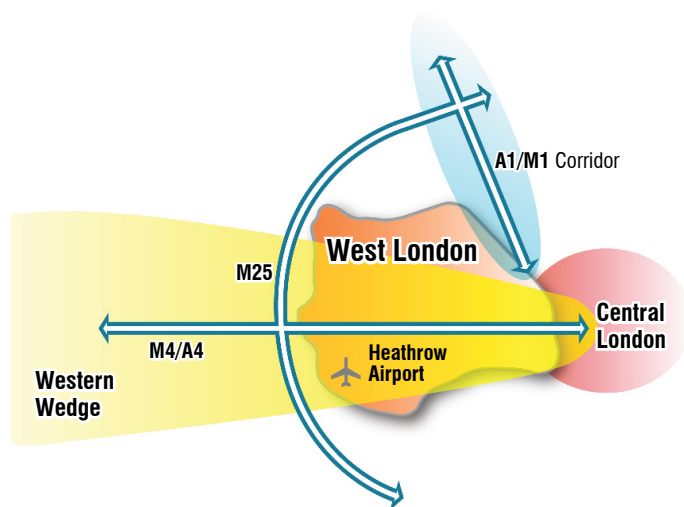
Opportunity #10: The Earls Court Regeneration Area is situated at the intersection of central and west London, a vector of high demand for both business and residential location, with few opportunities for major development.

If the population forecasts and demand estimates are reliable for London as a whole, the question still remains as to why West London in general, and the Earls Court Regeneration Area in particular, should be the recipient of that growth, given the competition that exists in London? Specifically, why is it appropriate particularly as a major new business quarter for the city? There are a number of reasons.

Maintaining the city's competitiveness will require a variety of space options to be provided for the broad range of users and uses seeking accommodation. Within the aggregate estimates for long-term demand it is possible to identify aspects that differentiate as to location and sector within London and to the major employment and living alternatives available. Although the pattern is complex, the financial services sector, historically located in the City, has preferred the expansion opportunities available in Canary Wharf and other Docklands locations. The legal services industry has, in part, followed them out. The West End office market is more characteristically made up of corporate head office and business services firms; their expansion options are more constrained if they wish to locate to the west and the space options are limited in terms of the type of buildings available – constraints resulting in West End office rental rates being the highest in the world. Both Hammersmith and Fulham and Kensington and Chelsea are already home to numerous such businesses; Hammersmith and Fulham has the largest creative sector economy in London. As noted previously, the growth opportunities in the western part of the central city are limited, and will be used up once the current stock of 'railway station' sites is fully developed.

Government and GLA planning and development policy has been concentrating on an eastward strategy for London, a strategy which has yielded many dividends for London as a whole. However, the attractions of the west – the cultural facilities, restaurants and clubs, the proximity to Heathrow and the adjacency to the highest value residential neighbourhoods – remain strong and must be capitalised upon. London is a large, complex city and a balanced approach to growth is not only desirable to accommodate all sectors of growth, but it is also necessary from a sustainable development perspective. The Earls Court Regeneration Area can uniquely provide a major business quarter at the western edge of Central London.

Figure 2.9 West London's strategic position



Source: adapted from the GLA's West London Sub-Regional Development Framework (May 2006).

Figure 2.10 Earls Court Regeneration Area is a key node in metropolitan London



The proposed investments in the District and Piccadilly Lines and the construction of Crossrail will open up considerable capacity available for western growth to the benefit of large areas like Earls Court Regeneration Area. Planning documents such as the current *London Plan* (Policy 5D.1) and the West London Sub-regional Development Framework propose the concept of a 'Western Wedge' of development, an economic corridor that starts at Paddington and embraces the intense economic activity along the M4 towards Heathrow. Initial proposals put forth as part of the *London Plan* review continue to support the development of corridors like the Western Wedge, acknowledging its importance at the city-region scale. The Earls Court Regeneration Area is well-located to serve the many businesses – including the telecommunications, information technology and media businesses characteristically located in this vector – needing a central city location for expansion and business development but not wishing to pay West End rents.

2.5 How does the Earls Court Regeneration Area Respond?

London is a leader on the world stage that enjoyed remarkable levels of growth over the past decade. As outlined, the long-term projections are for this expansion to continue resulting in some very large demands for office and residential space by 2026 – 2.9 million sq. m. of office development and 660,900 new homes. It is within that context that the role of the Earls Court Regeneration Area can be placed.

Identifying sites where growth can be accommodated will be a challenge for the city moving forward as most available large sites have been accounted for to date (see Figure 2.2: Major development areas). While consideration has been given to a variety of options for development, including residential only, the Earls Court Regeneration Area is a unique opportunity in the capital, capable of contributing in a significant way to London's ongoing global competitiveness by accommodating development of a metropolitan scale and mix. With a project timeline that is not due to start before 2012, the Earls Court Regeneration Area is ideally positioned to begin leading the next generation of London's evolution, responding to the need for a range of spaces.

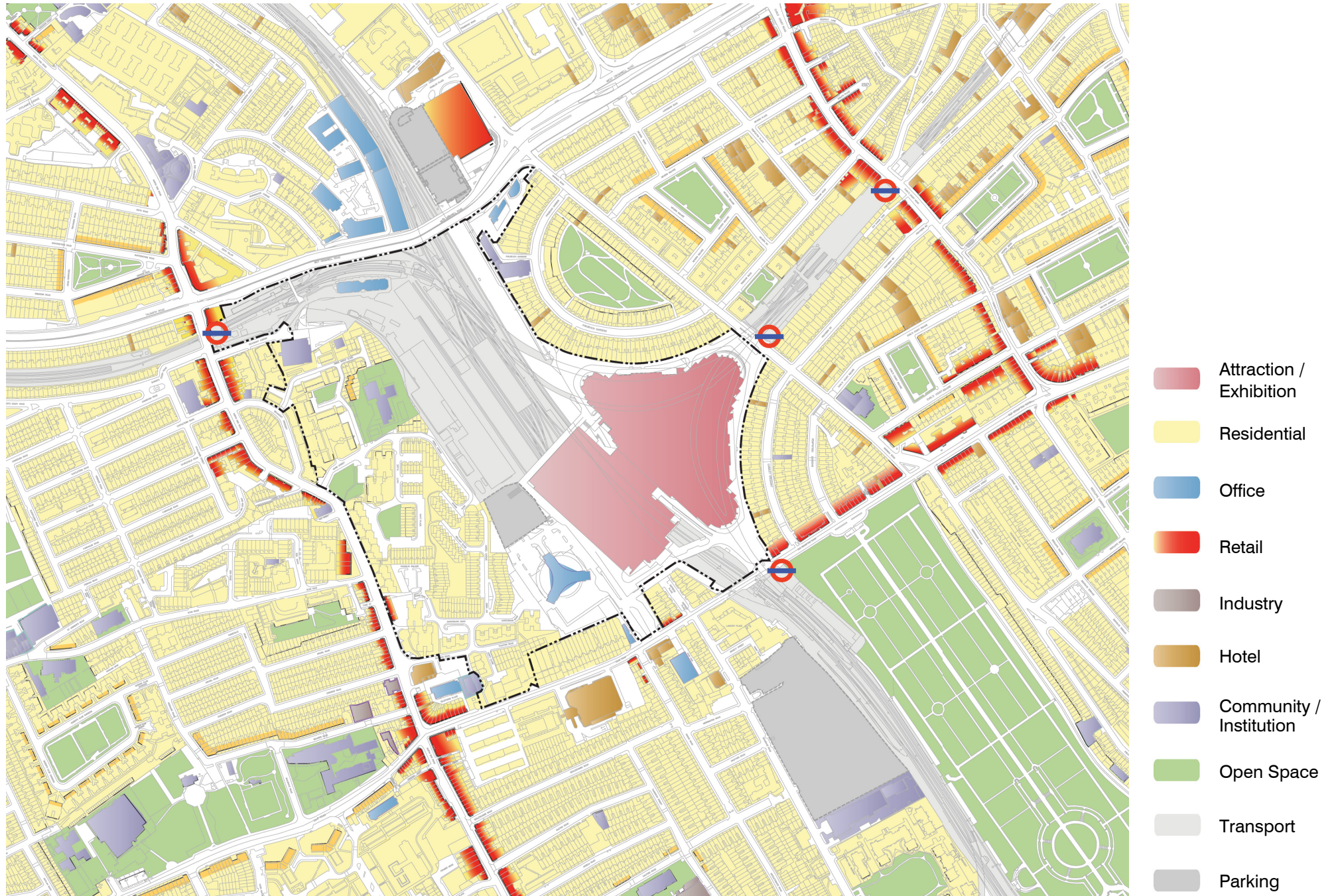
An estimate has been made of the likely contribution that the Earls Court Regeneration Area could make to meeting London’s expected demand. The following is an indicative land use budget, broken down by contribution by major land use group:

Office	400,000	to	550,000 sq. m.
Residential	9,000	to	10,000 units
Retail	40,000	to	55,000 sq. m.
Hotel	45,000	to	65,000 sq. m.
Culture, destination and leisure	35,000	to	50,000 sq. m.

This potential development programme would be augmented by approximately 10,000 to 20,000 sq. m of educational and other social and local community uses. At this stage in the development of the regeneration scheme, these numbers represent ranges and possibilities and are only one of a number of inputs into the development and design work to be considered as the project moves forward. They will inform the choices and trade-offs to be made in identifying the final combination and quantum of each type of use for the area.

Current preference is for a mixed-use development that will create a vibrant new urban district. Nonetheless, the analysis does lead to the conclusion that market support exists for a very substantial business quarter and mixed use development in the Earls Court Regeneration Area.

Figure 3.1 Current area land uses



3.0

A Profile of the Framework Area

3.1 The Physical Environment

The physical environment of the Earls Court Regeneration Area and its context is diverse in the use, type and scale of buildings, streets and open spaces. The major uses are identified on Figure 3.1: Current area land uses. Within the area itself, elements of transport infrastructure and the built environment present major challenges for redevelopment.



1 Earls Court 1 exhibition centre, viewed from Warwick Road



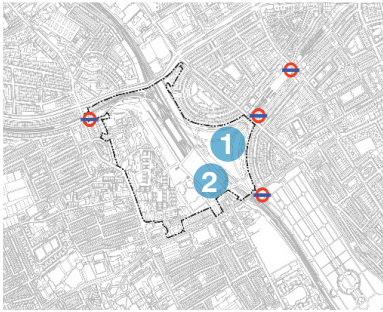
2 Empress State Building & Earls Court 2 exhibition centre, viewed from Lillie Road



3 Existing council estate in the Regeneration Area

The Regeneration Area

Earls Court Exhibition Area



Issue #1: Accommodating exhibition uses has disrupted the urban fabric and segregated Earls Court from the area around it.

At the heart of the Regeneration Area are the Earls Court exhibition buildings and accompanying lands (1). The scale of the buildings and their loading / unloading areas and the nature of their use have segregated Earls Court from the surrounding communities, compounding the separation in the urban fabric of west London created by the West London Line. The Earls Court 1 and 2 buildings reach effectively 18 stories from the base of the deck on which they sit. Surrounding them are substantial areas for circulation and event preparation and takedown.

Located to the west of Earls Court 2 is the 31-storey Empress State building, occupied by the Metropolitan Police Service (2).

Council Estates



Issue #2: The potential of the council estates is not being maximised.

Issue #3: The council estates are designed in a way that prevents their easy integration into the surrounding urban fabric.

The western portion of the Regeneration Area is occupied by two council estates – West Kensington and Gibbs Green – which are typically 1960s in their form and character (3). Though a few larger tower blocks of 9, 10 and 11 storeys are present, the estate accommodation is primarily low and medium scale density buildings. The estates suffer from the discontinuous internal roads and awkward placing of buildings at odd angles to the perimeter streets characteristic of this era of urban development, preventing easy integration into the fabric of the surrounding city. The generous provision of internal parking has a particularly dominating effect on the visual landscape.



4 Earl's Court station



5 West Brompton station



6 West Kensington station



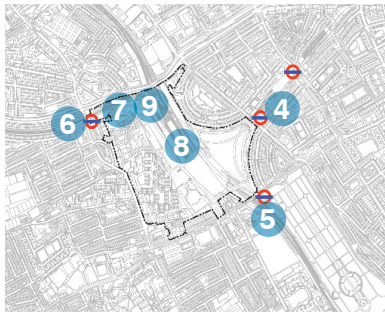
7 Rail lines in the northwestern portion of the Regeneration Area



8 Rail lines in the eastern portion of the Regeneration Area



9 TfL training facility viewed from A4 / West Cromwell Road



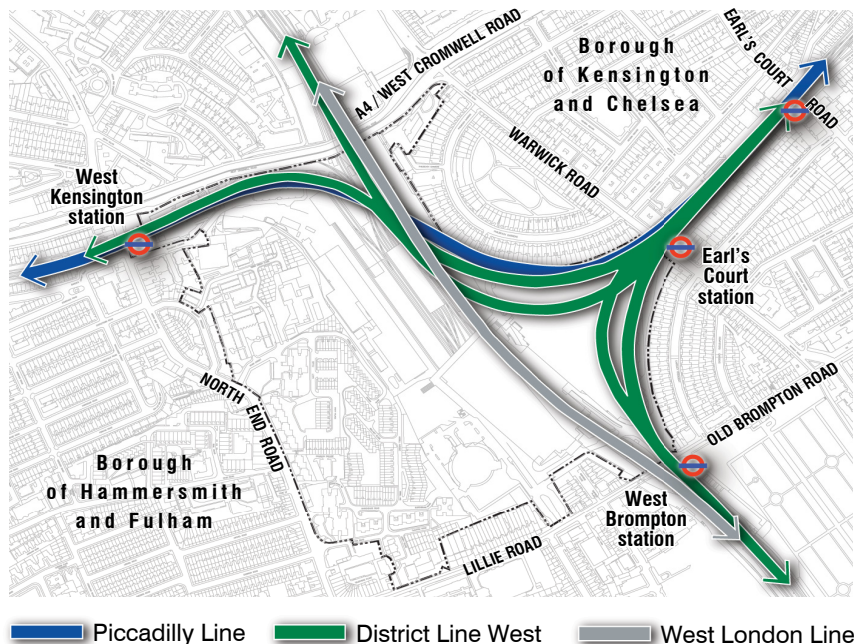
Rail Infrastructure

Issue #4: Railway infrastructure traverses the area, preventing linkages and connections through the Earls Court exhibition area.

Issue #5: The railway operations will require ongoing and careful accommodation.

Opportunity #11: The area is one of London's most connected with transport links at the local, metropolitan, regional and national scales, providing an opportunity for a highly accessible and sustainable development.

Figure 3.2 Rail infrastructure

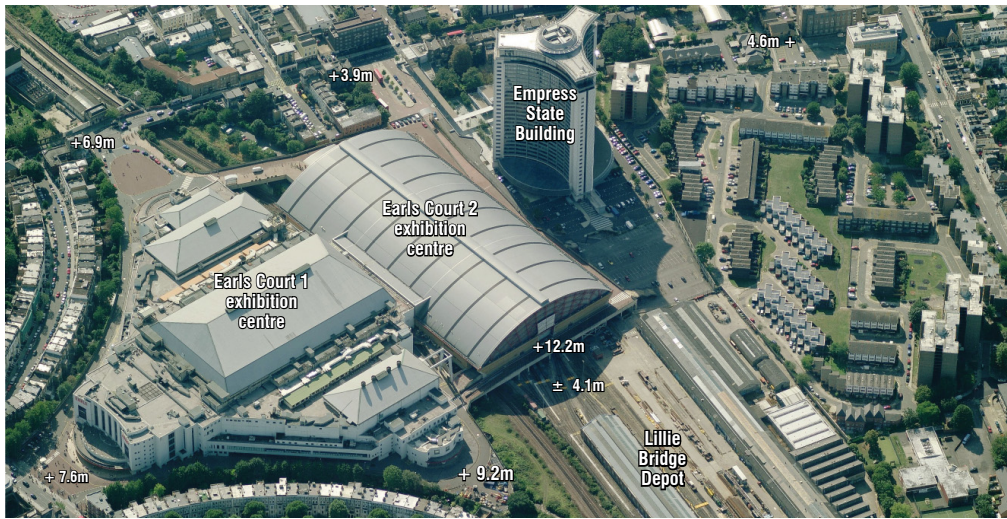


The Earls Court Regeneration Area is one of London's most connected locations. It has important links at all geographical scales – local, metropolitan, regional and national. Three London Underground Limited (LUL) stations – Earls Court (4), West Brompton (5) and West Kensington (6) – and one London Overground station (West Brompton) (5) serve the area.

This level of integration into the railway and LUL networks means rail infrastructure has a notable presence in the Regeneration Area, which is traversed by the District Line, the Piccadilly Line and the West London Line (7 and 8) (see Figure 3.2: Rail infrastructure). The area's high level of accessibility has consequences for redevelopment; the rail lines to the east and north fragment the area in distinct ways. Each also has particular requirements for distance separation and load bearing for any building situated above.

The potential for continued use of part of the Lillie Bridge Depot maintenance yards in the central and northern portions of the Regeneration Area add to the transport infrastructure requirements to be accommodated in redevelopment. The depot is currently used as a maintenance facility by TfL but there is the opportunity for a significant part of the site to be released.

A second office building of 9 storeys can be found on the northern edge of the Regeneration Area and is used as a TfL training facility (9).

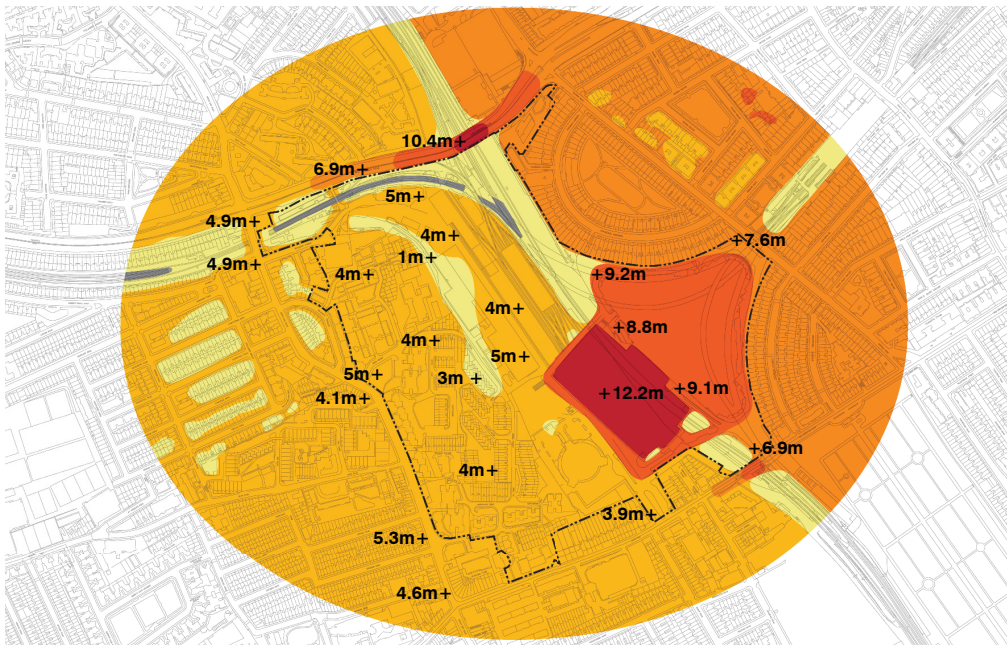


Topography

Issue #6: Changes in elevations and ground levels and the presence of the West London Line create a challenging topography across the Regeneration Area.

There is a distinct topography east and west across the Regeneration Area that will impact redevelopment. Changes in elevations and ground levels combined with the need to provide clearance over the West London Line create a substantial east / west level change running north / south through the area.

Figure 3.3 Existing area levels



- 10m and above
- 8.0 - 9.0m
- 6.0 - 7.9m
- 4.0 - 5.9m
- 0 - 3.9m
- 0m and below

Figure 3.4 Conservation areas

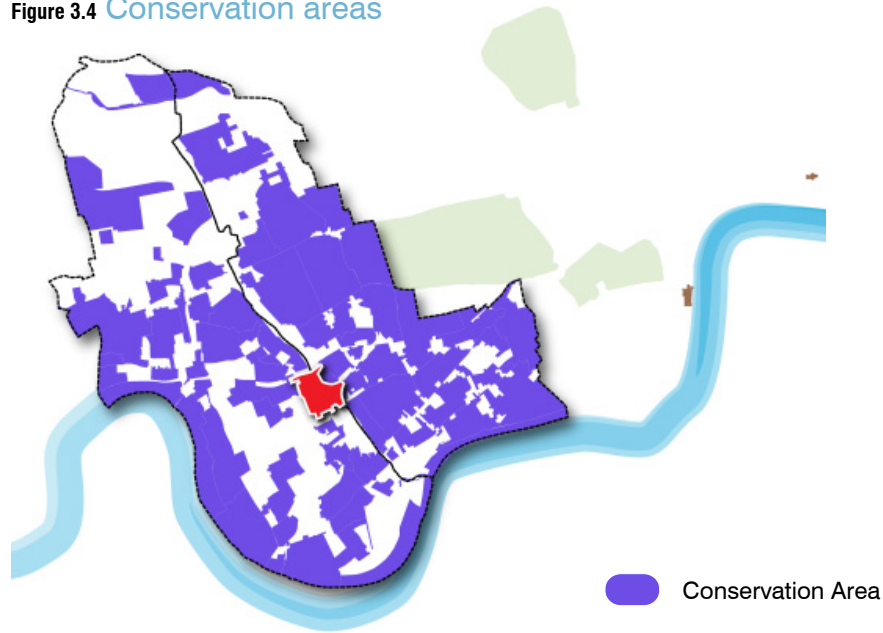
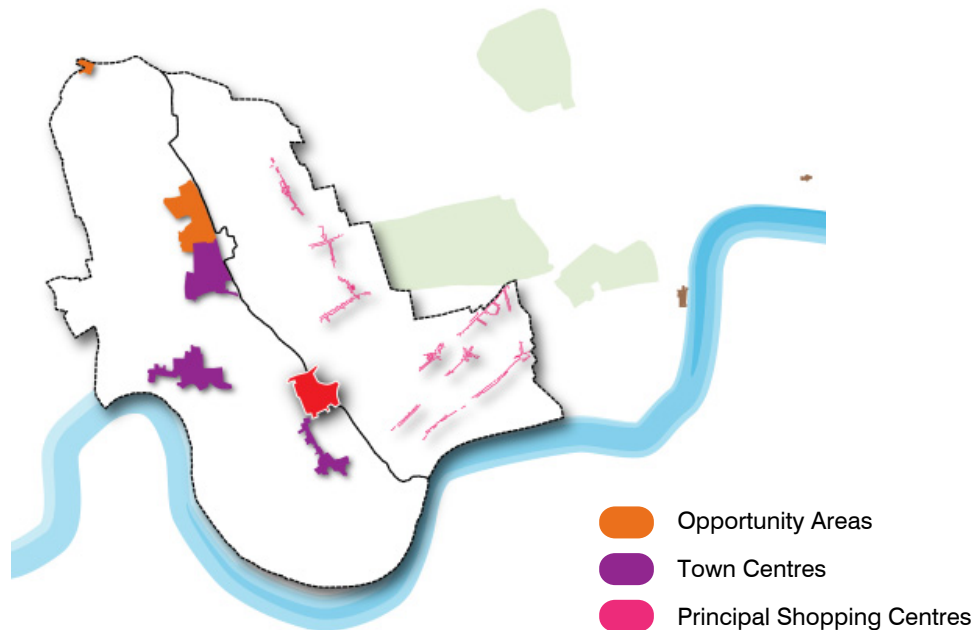


Figure 3.5 Areas of regeneration and retail focus (as per UDP)



The Surrounding Area

Opportunity #12: The surrounding Conservation Areas are important features of both boroughs which can both complement new development and be enhanced by the sensitive introduction of new buildings, open spaces and uses.

The immediate context of the Earls Court Regeneration Area is characterised by primarily low and medium density residential communities and local commercial streets with discontinuous retail frontages. Some higher buildings are located along the A4 / West Cromwell Road corridor and Lillie Road. Though not in a designated Conservation Area itself, the Earls Court Regeneration Area is immediately adjacent to protected areas of Hammersmith and Fulham and Kensington and Chelsea. It is also closely located to areas of regeneration and retail focus for both Boroughs, including Fulham Town Centre, Hammersmith Town Centre and the Principal Shopping Centres of Kensington and Chelsea. The three LUL stations – Earl’s Court, West Brompton and West Kensington – and one London Overground station (West Brompton) serving the area are located around its immediate perimeter.



1 Mansion block streets of Kensington and Chelsea



2 Earl's Court Road



3 Warwick Road



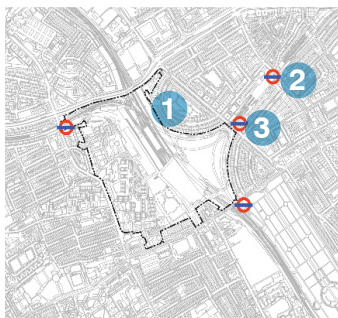
4 North Fulham residential street



5 Lillie Road



6 Brompton Cemetery



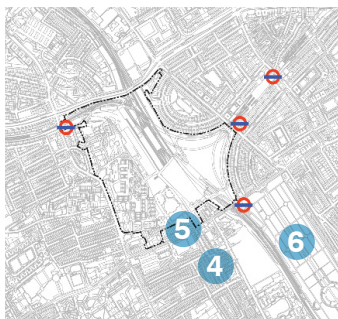
To the East

Issue #7: The Earl's Court Road / Warwick Road one way system has had a negative impact on the quality of the environment and pedestrian experience.

Issue #8: Traffic congestion and air quality are continuing problems in the area around Earl's Court Road / Warwick Road.

To the east of the Regeneration Area, extending from Warwick Road to Earl's Court Road, are the Victorian crescents and mansion block streets of Kensington and Chelsea (1). These streets have played a key role in defining the character of the area. Earl's Court Road is an active and increasingly attractive high street of shops and restaurants (2). However, its pairing with Warwick Road (3) to create the Earl's Court Road / Warwick Road one way system has had a particularly detrimental impact on the quality of the environment and the pedestrian experience. The dominance of the car is revealed through the high levels of traffic congestion and poor results against air quality measures.

To the South



Opportunity #13: Brompton Cemetery is a valued community resource which can both complement new development in the area and benefit from it by the new connections the Regeneration Area can offer.

Across Lillie Road to the south, and west of the Regeneration Area, are the neighbourhoods that comprise North Fulham (4), a designated New Deal for Communities (NDC) area. The area to the south is undergoing renewal with many properties displaying evidence of recent renovation and upgrading. Lillie Road is a low scale, discontinuous local commercial street with some higher scale residential and hotel developments on the south side (5). Brompton Cemetery, an important community resource, borders the West London line (6).



7 Clem Atlee housing estate at Lillie Road / North End Road intersection



8 Normand Park and related community facilities



9 Local commercial street North End Road



10 Star Road housing estate west of North End Road



11 Mansion blocks at Beaumont Crescent



12 A4 / West Cromwell Road Corridor



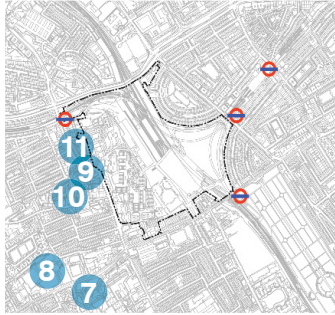
13 Council estates on North End Road north of West Cromwell Road



14 Office building on the southwest corner of the Warwick Road / A4 West Cromwell Road intersection



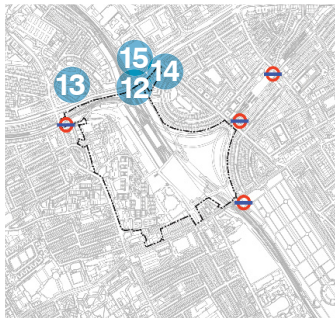
15 Tesco building on the northwest corner of the Warwick Road / A4 West Cromwell Road intersection



To the West

Issue #9: North End Road is a disjointed and tired commercial street that is not fully benefitting from the prosperity found nearby and experienced at Fulham Broadway and Earl's Court Road.

Much of the area to the west is also part of the North Fulham NDC area. Beyond the Lillie Road / North End Road intersection is the substantial Clem Atlee housing estate (7), the recently renovated Normand Park (8) and related community facilities. North End Road is characterised by low scale local commercial and residential uses and is host to the regular North End Road Market (9). To the west of North End Road is a mix of council housing (along Star Road) and relatively stable residential streets (10). At the top of North End Road at Beaumont Crescent and adjacent to the Gibbs Green Estate are a number of well-maintained late 19th Century mansion blocks (11).



To the North

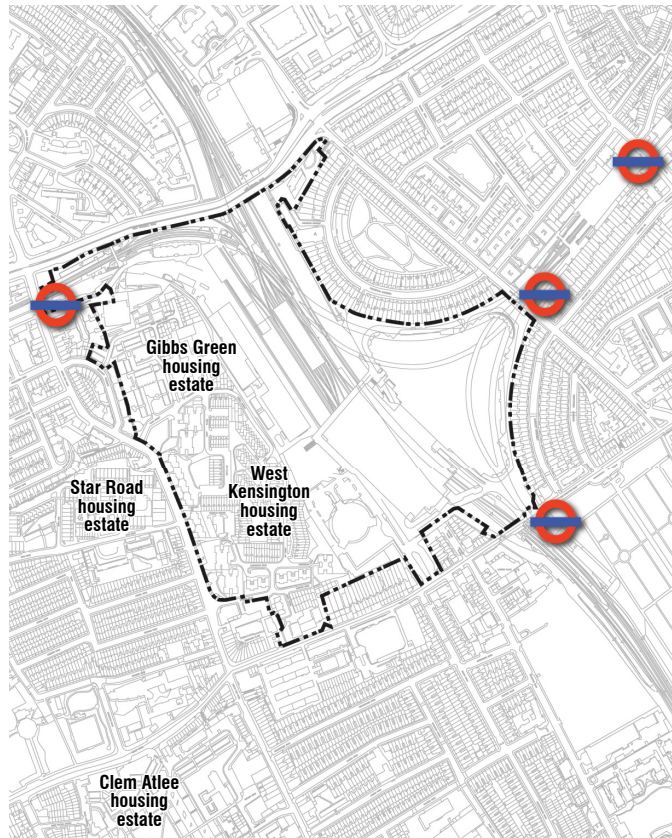
Issue #10: The A4 / Cromwell Road corridor is a dominating feature of the local area, which acts as a divider between the Framework area and the communities to the north.

Opportunity #14: The potential for new residential uses in the area is promoted in the *Warwick Road Planning Brief*.

The northern perimeter of the Regeneration Area is defined by the dominating A4 / West Cromwell Road corridor (12). Beyond the corridor between North End Road and Warwick Road are a mix of residential, commercial and office uses. The residential areas are quite varied – attractive streets of historic mansion blocks, Georgian terraces in need of upgrading and council estates. North End Road features a mix of activities, including retail and residential in the form of Council estates (13). An office building (14) and a Tesco supermarket (15) occupy the southwest and northwest corners of the Warwick Road intersection. A mix of uses can be found along Warwick Road, though the area is currently the focus of a Borough Planning Brief which seeks to introduce new residential developments along its western edge.

3.2 The People

Figure 3.6 Communities distribution



The Earls Court Regeneration Area and its local context area sit at the centre of an area of broad contrasts, straddling borough boundaries and surrounded by some of the wealthiest and some of the poorest communities in the country. The Boroughs of Hammersmith and Fulham and Kensington and Chelsea are adjacent to the affluence and international importance of the West End, as well as to the dynamic zone of economic activity leading west to Heathrow Airport and beyond. The Regeneration Area and its surrounds reflect borough averages for key socio-economic indicators – residents are generally prosperous, with good skills and stable employment – yet distinct pockets of high social disadvantage exist as indicated by the socio-economic profile displayed in Figure 3.7: A socio-economic profile of the local area and Figure 3.8: Deprivation map of the boroughs.

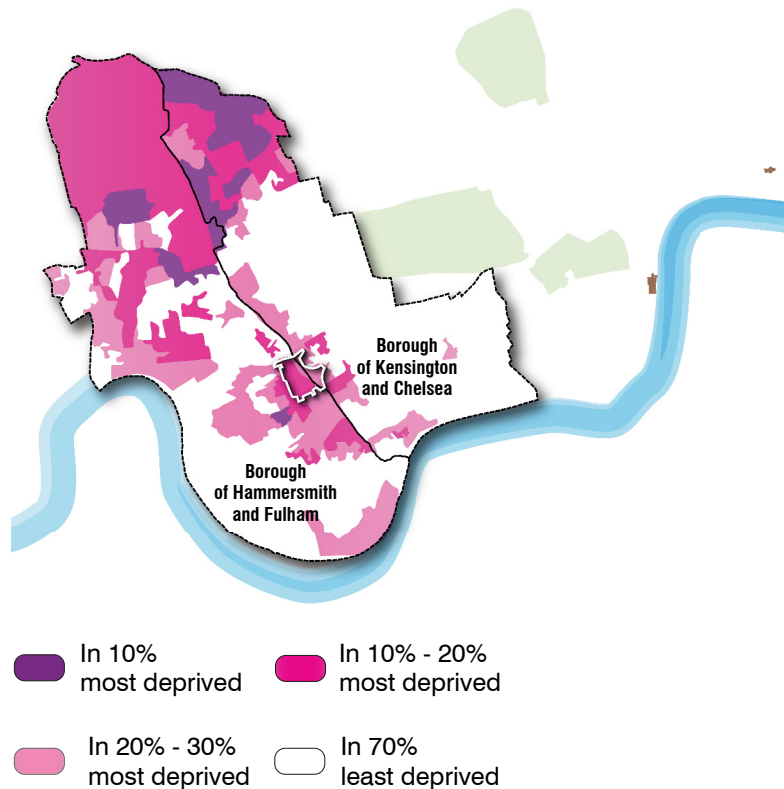
Figure 3.7 A socio-economic profile of the local area

	Framework Plan local context area	Earls Court Regeneration Area + Clem Atlee Estate + Star Road Estate	LBHF	RBKC	London	England
Households who own their home (2001)	38%	22%	44%	44%	57%	69%
Households who are social renters (2001)	34%	62%	33%	26%	26%	19%
Households who are private renters (2001)	26%	12%	21%	15%	16%	10%
Working age residents who are income support claimants (2007)	8%	14%	7%	6%	7%	5%
Economically in-active: Unemployed (2001)	5%	6%	5%	5%	4%	3%
Households with no adults in employment and dependent children (2001)	6%	13%	6%	4%	7%	5%
Households with limiting long term illness (2001)	27%	37%	27%	24%	30%	34%
Working age residents never worked/long term unemployed (2001)	6%	13%	6%	5%	7%	4%
People aged 16-74 with no qualifications (2001)	16%	30%	18%	13%	24%	29%
People aged 16-74 with highest qualification attained Level 1 (2001)	7%	12%	8%	6%	13%	17%

Source: Office for National Statistics

Deprived Areas

Figure 3.8 Deprivation map of the boroughs



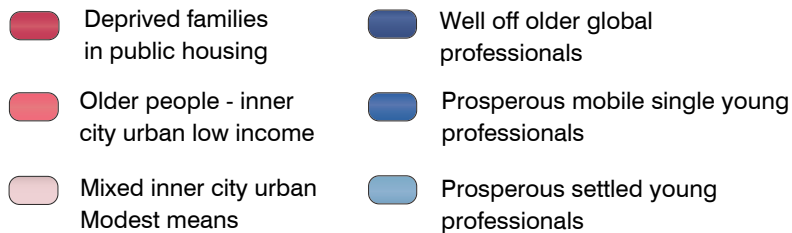
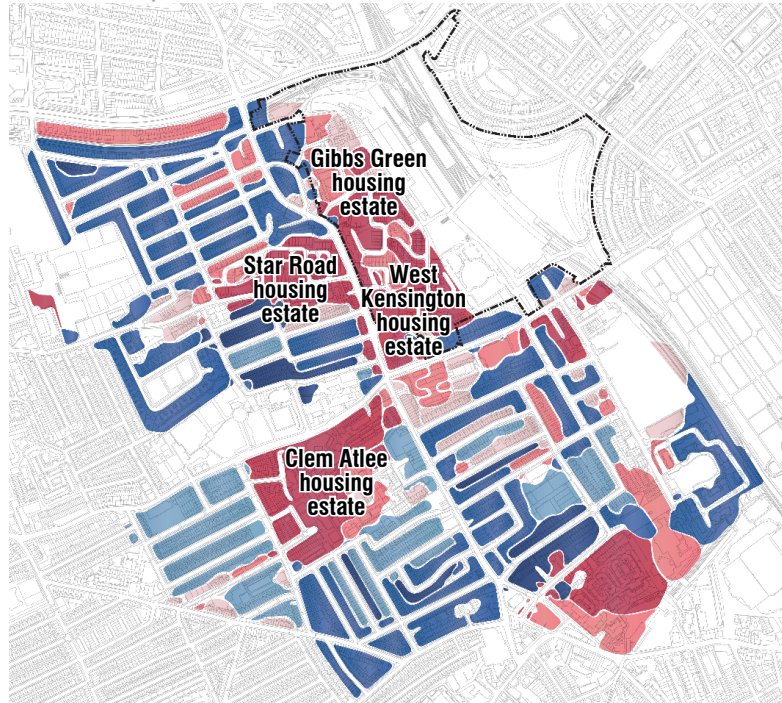
Issue #11: The four major housing estates found in the local area correspond with the areas of most intense deprivation in North Fulham and rank among the top 20% of the most deprived areas in the country.

Within the wider area, there is a significant segment of the population not receiving the benefits of this general prosperity, as can be seen from the second column of Figure 3.7: A socio-economic profile of the local area, which combines the estates in and adjacent to the Earls Court Regeneration Area. Portions of the area rank among the top 20% of the most deprived areas in the country. This deprivation is concentrated in the four council housing estates – West Kensington and Gibbs Green in the Regeneration Area, Star Road across North End Road to the west and Clem Atlee to the southwest. Twice the percentage of residents here suffer from social and economic dependence, low qualifications and limiting long-term illness when compared to their neighbours.

Source: LBHF and RBKC, IMD 2007

Socioeconomic Segregation

Figure 3.9 Deprivation in North Fulham



Source: LBHF Customer Segmentation Survey (Ward Profiles of North End Ward and Fulham Broadway Ward)

Issue #12: Socio-economic segregation exists alongside wealth and prosperity.

Opportunity #15: The local area has many strong neighbourhoods that could support and reinforce regeneration efforts.

Opportunity #16: Redevelopment of the Earls Court Regeneration Area in a manner that is outward looking and which engages with adjacent areas would have positive impacts for the existing local community.

In 2005 / 2006 Hammersmith and Fulham Council undertook a study to understand better the residential population of the borough. The disparities previously described are clearly confirmed by the results. The areas in most need of attention and regeneration are the housing estates. Fortunately, they are surrounded by otherwise strong and stable areas, including those in neighbouring Kensington and Chelsea. The immediate presence of prosperity adjacent to areas in need of assistance can reinforce focused regeneration efforts aimed at those deprived communities and intended to reduce segregation.

Housing Affordability

Issue #13: Home ownership is currently out of reach for a number of residents.

The challenging social and economic conditions in North Fulham and the strength of the local housing market has made home ownership in the area nearly unattainable for a range of residents – from those on assistance to relatively prosperous young professionals and families. Kensington and Chelsea has the highest average house prices in the country, and Hammersmith and Fulham has the 4th most expensive residential property in the country.¹¹ When these prices are compared to the average annual incomes of residents, the lack of affordability is made even clearer. To purchase a home in Kensington and Chelsea selling for the average price in the borough requires an investment equal to 34 times the average borough income. In Hammersmith and Fulham, the house price to income ratio is 1:12.¹² Compared to the London ratio of 1:10 it is clear that home ownership in Hammersmith and Fulham and Kensington and Chelsea is at present an option only for those in the highest income brackets.

¹¹ Land Registry, House Price Index July 2008 and April 2009 releases.

¹² Based on data from the LDA Economic Profile of the Boroughs (September 2007).

North Fulham as a Regeneration Priority

West Kensington Estate



Issue #14:

Creation of a sustainable and balanced community in the local area has been hindered by the concentration of social and economic deprivation coupled with housing market conditions which have made accessing home ownership difficult for a range of residents.

Opportunity #17:

The public and private sectors are poised to together take on the challenges of social and economic deprivation, housing mobility, environmental quality and other regeneration issues present in this part of the borough.

Opportunity #18:

The redevelopment of the Earls Court Regeneration Area to achieve multiple objectives and significant positive impacts for stakeholders is supportive of Hammersmith and Fulham's regeneration initiatives.

The Borough of Hammersmith and Fulham is seeking new and innovative ways to address the challenges of social and economic deprivation and housing affordability. North Fulham has been identified as a priority area for regeneration by the Borough and the Council has established its Borough of Opportunity initiative, which has supported events like the 2007 Developer's Summit as a new way of engaging private sector partners in finding solutions for these challenges. However, these efforts need to evolve into a comprehensive regeneration strategy for North Fulham. That strategy needs to tackle both the supply and the demand aspects of the housing market, by offering access to affordable home ownership and addressing the lack of adequate earning power of a significant number of households. It must address directly the low levels of qualifications and the prevalence of unemployment and underemployment characteristic of areas of deprivation in the community. The objective must be to create a more sustainable and successful community fully capable of participating in and contributing to the prosperity surrounding it.

The routes to achieving that objective are set out in this Framework. Unique in this area of West London, the redevelopment of the Earls Court Regeneration Area can have the scale, diversity and private sector participation to become the catalytic opportunity to realise this regeneration strategy and create the desired socio-economic mix and balance.

Securing the future
delivering UK sustainable development strategy



OF LONDON

The London Plan
Spatial Development Strategy for Greater London



February 2004



**Core Strategy and
North Kensington Plan**
"Towards Preferred Options"

Public Consultation Draft: July 29 - October 10 2008
Local Development Framework
Development Plan Document

Appendices under separate cover



4.0

Planning Policy

4.1 Planning Policy Context

The evolution and ongoing development of UK communities is guided by a collection of planning policy documents produced at the national, regional and local levels. Together, they provide the framework for achieving a series of planning and development objectives related to a number of topics falling under such headings as sustainable development, land use, transportation and housing. The following is a review of a selection of key policy documents relevant to a discussion of opportunities in the Earls Court Regeneration Area.

National Policy

The Government's sustainable development strategy – *A Better Quality of Life – A Strategy for Sustainable Development for the UK (1999)* – sets the stage for national planning policy which seeks to promote more sustainable patterns of development through the efficient use of land and transport infrastructure (*PPS1: Delivering Sustainable Development*). Acknowledging the key role planning has to play in the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community, *PPS1* promotes development plans that allow environmental, economic and social objectives to be achieved in an integrated and holistic way. In order to deliver this vision, patterns of growth must be managed to make maximum use of public transport and ensure land is used efficiently through mixed use development at higher densities. The scale, mix, intensity and accessibility of Earls Court regeneration provide a unique opportunity to advance sustainable development over a large area.

Creation of sustainable, mixed communities as envisioned in *PPS1* requires renters and buyers to be given a choice – choice in where they live, in the type of home they have – and options that they can pay for, whether they require affordable or market housing. *PPS3: Housing* seeks to widen opportunities for home ownership and affordability to ensure everyone can live in a decent home in a community they wish to be in that provides good access to jobs, services and infrastructure. In particular, it promotes “making effective use of land, existing infrastructure and available public and private investment, particularly for mixed use developments.” Again, the potential scale and intensity of the new Earls Court makes possible a full range of housing strategies.

PPG13: Transport seeks to “integrate planning and transport to promote more sustainable transport choices; promote accessibility to jobs, shopping, leisure facilities and services by public transport and cycling, and; reduce the need to travel, especially by car.” By influencing factors such as the location, scale, density, design and mix of land uses, planning can help reduce the need to travel and the length of journeys while promoting sustainable modes of travel such as transport, walking and cycling. Specifically, major transport generating development and uses (including offices, retail, commercial, leisure, hospitals and conference facilities) should be located near public transport interchanges so that the fullest use can be made of this infrastructure. Wherever possible, a mix of uses, including residential, should be combined to achieve this level of use. The Earls Court Regeneration Area is remarkably well-served by transport infrastructure.

The UK Government’s *Energy White Paper* aims “to put the UK on a path to cut its carbon dioxide emissions by some 60% by 2050, with real progress by 2020.” *PPG22 Renewable Energy* seeks to establish planning and land use principles that will guide the realisation of this goal. Support is given for on-site renewables where it is viable given the type of development proposed, its location, and design. The scale of the Earls Court Regeneration Area can allow for consideration of energy strategies and technologies not possible on smaller sites.

Regional Policy for London

The *London Plan* is the guiding land use and planning document for the capital. As such it sets out the spatial strategy and policy context for how and where growth is to be accommodated, taking into consideration the factors impacting London's growth for the coming 15 to 20 years. The Plan aims to ensure London's development is sustainable by seeking to "promote, support and encourage the development of London in ways that will secure a series of social, environmental and economic objectives". These objectives include optimising the development of previously developed land, promoting development in areas accessible by public transport and the potential of mixed use development to strengthen communities and local economies. The Plan supports greater intensification, particularly for mixed use developments, as a means of meeting London's housing and employment needs and for realising the potential of previously developed sites (Policies 2A.2, 3B.3). Tall buildings are supported in the *London Plan* as "catalysts for regeneration" and / or where they can provide "a coherent location for economic clusters of related activities" (Policy 4B.9). The scale and accessibility of the Earls Court Regeneration Area provides a unique opportunity to realise these policy ambitions.

The GLA is currently undertaking a review of the *London Plan* to establish the direction London's development will take over the next 20 years to approximately 2031. Published in April 2009, the GLA's *A new plan for London: Proposals for the Mayor's London Plan* indicates the key challenges the future *London Plan* will seek to address – ensuring London remains dynamic and economically successful, while simultaneously guaranteeing a good and constantly improving quality of life and taking a lead role in addressing the important economic, environmental and social issues. The revised draft *London Plan* is scheduled to be issued for public consultation in autumn 2009, with the final plan published in winter 2011/12.

Emerging Local Policy

The *Planning and Compulsory Purchase Act 2004*, and the related regulations and guidance, introduced a revised planning system in the United Kingdom. The new system replaced the UDP with Local Development Documents (LDDs) that together form an LDF. The Core Strategy is the overarching document of an LDF. It highlights key issues and establishes strategic policies to address these issues. Importantly, the Core Strategy sets out the long-term vision for planning and development and the locations for delivering on key housing and development requirements.

Both the Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea are in the process of preparing their first LDFs. The following sets out the emerging policy directions for each as is represented in various draft Core Strategy consultation documents.

London Borough of Hammersmith and Fulham

The Borough of Hammersmith and Fulham has released its *Core Strategy Options* document for consultation. Building on the Community Strategy for the borough, key priorities for delivering the spatial vision for Hammersmith and Fulham are identified:

1. Promoting home ownership
2. Regenerating the most deprived parts of the borough
3. A top quality education for all – schools of choice
4. Setting the framework for a healthy borough
5. Tackling crime and anti-social behaviour
6. Creating a cleaner, greener borough
7. Delivering high quality, value for money public services

The consultation document presents a number of alternative scenarios for the future development of the borough and sets out a preferred option for what is described as the Earls Court Regeneration Area in this framework document. This preferred option seeks a comprehensive development of the three landholdings comprising the Regeneration Area for a mix of uses, including residential, employment, hotel, leisure and office uses. Envisioned as a vibrant world class new urban quarter, the option presented includes:

- A full range of new community facilities and open space
- Support for improving connectivity both within the Regeneration Area and beyond
- The potential for an ICC as part of a major refurbishment and/or development within the existing Earls Court & Olympia complexes
- The phased redevelopment of Gibbs Green and West Kensington estates
- Support for tall buildings

Consultation on the *Core Strategy Options* continues until mid July 2009. The Borough currently expects adoption of the final Core Strategy in early 2011.

Royal Borough of Kensington and Chelsea

The Royal Borough of Kensington and Chelsea has identified seven strategic objectives or themes to guide development over the period the LDF is in place:

1. **Keeping life local** – ensuring local shops and community facilities are accessible to residents
2. **Fostering vitality** – ensure a rich mix of entertainment and creative uses
3. **Better travel choices** – to promote sustainable travel choices
4. **Caring for the public realm** – to ensure an attractive borough and reflect its values of mutual respect and responsibility
5. **Renewing the legacy** – to preserve and build upon the borough’s built environment
6. **Diversity of housing** – to ensure a range of new homes in terms of size and tenure, built in high quality mixed communities
7. **Respecting our environmental limits** – to be at the cutting edge of environmental sustainability

The Borough is now consulting on a series of places and strategic sites that are central to achieving the strategic objectives of the Core Strategy. It has identified 14 “places” requiring specific attention to place-making and integration of strategic objectives. The wider Earl’s Court area, of which the Earls Court Regeneration Area is part, is one such place. The portion of the Regeneration Area located within Kensington and Chelsea has also been designated a Strategic Site, meaning its development is considered by the Borough to be central to the achievement of strategic objectives for both the wider area and the Core Strategy itself. A brief delivery strategy has been proposed for the site which includes continued exhibition centre uses and / or convention centre use, with additional potential for office and residential uses. The Borough would also support:

- Significantly more residential and potentially additional office accommodation, subject to improved accessibility to the site
- An ICC on the site as part of a mixed use development

The Royal Borough of Kensington and Chelsea is currently scheduled to release a draft LDF Core Strategy in autumn 2009. The Examination in Public is expected to take place in autumn 2010.

Policy Implications for the Earls Court Regeneration Area

Existing and emerging planning policy from the national to the local level supports development which will realise a full range of social, economic and environmental objectives in areas of significance like the Earls Court Regeneration Area. Specifically, planning policy envisions effective redevelopment as that which:

- Supports a mix of uses that will bring vitality to area and balance the demand on public transport use
- Maximises the potential of transport infrastructure and supports sustainable travel choices
- Maximises the density of development
- Delivers a range of types of accommodation and affordability
- Accommodates major destination developments
- Provides an appropriate setting for high quality tall buildings, creating attractive landmarks while meeting an economic need and providing a catalyst for regeneration
- Promotes and advances innovation in sustainability
- Is identified by high quality design of both buildings and public realm and the integration of new development with its surroundings

Fulham Town Centre



5.0

A Strategy for Regeneration and Renewal

The scale and significance of the potential development of the Earls Court Regeneration Area, as revealed in the preceding analysis, has important implications for the two boroughs. The filling in of what is effectively a large void in the structure of North Fulham would bring a new level of vitality to the Earls Court Regeneration Area, with its regeneration energy spreading beyond the area itself. Redevelopment can be the catalyst for a significant improvement in the economic and social health of North Fulham and to the overall attractiveness and livability of the surrounding district. The strategy outlined below presents 11 regeneration objectives and describes how redevelopment of the Regeneration Area plays a central role in unlocking the regeneration potential in both Hammersmith and Fulham and Kensington and Chelsea.

Regeneration Objective 1:	Regenerate the estates and rebalance the community
Regeneration Objective 2:	Offer housing choices
Regeneration Objective 3:	Create a ladder of employment opportunity
Regeneration Objective 4:	Close the skills gap
Regeneration Objective 5:	Bring investment to local centres
Regeneration Objective 6:	Establish a world class business quarter
Regeneration Objective 7:	Support the principle of an International Convention Centre as part of a scheme including the Olympia and Earls Court complexes
Regeneration Objective 8:	Improve accessibility to the area
Regeneration Objective 9:	Build a sustainable community
Regeneration Objective 10:	Reinvent the destination
Regeneration Objective 11:	Design a unique place

West Kensington Estate



Regeneration Objective 1: Regenerate the estates and rebalance the community

The four major council housing estates in the Earls Court Regeneration Area correspond with the areas of most intense deprivation in North Fulham:

- Compared to the two boroughs, twice the percentage of residents in the estates are on income support
- Compared to London and the two boroughs, approximately twice the percentage of residents are unemployed
- More than twice the percentage of households with no adults in employment also have dependent children, compared to the two boroughs
- Compared to the two boroughs, more than twice the percentage of residents in the estates have never worked or suffer from a limiting long-term illness

It is understood that approximately 4,700 residents are accommodated in a total of 1,900 units. Only 22% of residents own their own home, compared to 44% in both boroughs and 57% across London. The estates offer a relatively low density form of residential accommodation at approximately 59 units per hectare, whereas the wider area, with its historically lower scale but dense built form, is built at about 77 units per hectare.

The successful regeneration of North Fulham requires a new approach to these Council landholdings, one that maximises their role in creating a healthy and sustainable community. The estates should be regenerated and repositioned in a manner that supports the evolution of North Fulham into a more diverse and balanced community capable of fully benefiting from the employment, housing and leisure choices that will become available through the long-term development of the Earls Court Regeneration Area.

The estates in the Regeneration Area (Gibbs Green and West Kensington) and the existing land of the remaining two estates could provide over 6,000 residential units at current *London Plan* densities¹³ through a combination of intensification and selective redevelopment. This equates to a tripling of their current yield. This under-utilised potential can both add different types of new housing and provide flexibility and capacity for any necessary relocation occasioned by redevelopment and go a long way to redressing the socio-economic imbalance of the area. By offering high quality residential development and a variety of routes to residency and ownership – including market-based, innovative home ownership mechanisms (as described below) as well as other forms of affordable housing – the estate areas would offer attractive and affordable options to a larger and more diverse group of prospective residents. Any changes to the estates must place the quality of life of residents as a top priority and ensure any new accommodation is provided in the local area, wherever possible.

¹³ Table 3A.2 of the *London Plan* suggests an urban site with a high PTAL could have a density of up to 260 units per hectare (uph). Assuming an average density of 200 uph over the estates, their combined site area would generate a total of approximately 6,000 units.

Coin Street Community Builders housing developments, London



Regeneration Objective 2: Offer housing choices

Fostering balanced and sustainable communities in the boroughs is a critical step in addressing the social and economic challenges of North Fulham and reducing the concentration of low aspirations, low educational attainment and crime. A broader range of housing choices generates a broader social mix, something that young people in particular would benefit from. Maximising housing choice is essential to promoting housing mobility and maintaining the important support networks present in a community like North Fulham. Providing the range of accommodation needed to allow residents to move home within the district as their household grows or contracts, or as their income changes, will help them to maintain important social and family networks and continue their engagement with the local community.¹⁴

The provision of both social and market housing remains an important objective but those with incomes too high to qualify them for assistance but too low to afford a home on the market – the intermediate market – are an important element of any balanced community. Typically young professionals, new families and key workers, these residents can bring community vitality and commitment to any neighbourhood. The redevelopment of the Regeneration Area will be sufficient in scope and scale to contribute a significant number of housing units of all types and tenures to the long-term area supply. It will offer the opportunity for the relevant partners – the Boroughs, developers, builders, financial institutions and agencies – to explore new and innovative programmes for expanding home ownership to a larger segment of the area's residents and new arrivals. By offering a range of high quality residential accommodation and a variety of routes to residency and ownership – including market-based, innovative home ownership mechanisms as well as other forms of affordable housing – more affordable and attractive options for housing would be available to a larger and more diverse group of prospective residents. The size and ownership structure of the Earls Court Regeneration Area itself will provide a unique platform for creative innovation in finding implementable solutions for a housing affordability challenge that exists across London.

¹⁴ Joseph Rowntree Foundation, *Creating and Sustaining Mixed Income Communities* (2006).



Regeneration Objective 3: Create a ladder of employment opportunity

A major redevelopment project implemented over a number of years, containing a mix of uses and activities, will create a substantial ladder of employment opportunity for local residents. Initial and on-going construction activity will require a significant labour force. The finished scheme will offer thousands of jobs at all levels:

from executive / managerial,
professional services,
administrative / secretarial,
office services / printing / graphics,
building maintenance / trades,
hospitality / catering / food preparation
delivery / cleaning / security

Major contractors and tenants could be encouraged to hire a minimum staff complement from the local area for certain types of positions. The potential spin-offs for local businesses from indirect employment related to new development in the Regeneration Area would be a substantial source of new opportunities as well.

Providing more quality local jobs for residents with the right skills will have important stabilising benefits for the community. Less time spent commuting provides parents more time with their families, allows residents time to engage with and take part in their community and offers a more sustainable approach to urban living. Higher quality jobs that boost local income levels will be key to expanding home ownership by providing residents with sufficient means to participate in innovative home ownership schemes on offer through such a large scale redevelopment. There are good examples of such local labour agreements – that can provide a model for the redevelopment of the Earls Court Regeneration Area, a project with the necessary scale for success.



Local job sourcing works: Heathrow Terminal 5

The Heathrow local labour strategy was established through a commitment made by BAA to invest £150,000 per year over 10 years to ensure that local people had access to the opportunities resulting from the T5 project.

A training programme was established on site to train and qualify local people. As project managers became aware of skills needed on the job, this information was shared with the training and recruitment organisers to ensure training was always targeted to real job needs. BAA partnered with local further education colleges to tailor existing construction training programmes to the needs of T5 and to encourage long term supply of skilled labour in construction to match the long timeline of the project. BAA also developed relevant curriculum for use in local schools.

With construction complete, the second phase of the local labour strategy will focus on the jobs that are available through airport operations.

Source: www.heathrowairport.com

Regeneration Objective 4: Close the skills gap

The ability for many local residents to access the ladder of employment created by the redevelopment and to benefit from these new opportunities will require a clear focus on advancing their skills. Closing the skills gap will necessitate a comprehensive and intensive training programme that brings together potential employees, employers, local training bodies and facilities. A clear connection between skills training and job placement and the redevelopment process must be established at the outset to guide training efforts. The redevelopment scheme should offer real-world, hands on local training for local residents to fill real needs. Partnerships with the two Boroughs, local technical colleges and universities could be established in the Regeneration Area to create additional draws while providing necessary skills improvement. Again, some successful models exist in other large-scale London projects that provide helpful examples for the Regeneration Area – London City Airport and ExCeL are examples of successful local community outreach and training programmes. The size and scale of the redevelopment proposed by the Framework provide a unique opportunity that cannot be readily found elsewhere in the two boroughs.

Figure 5.1 Local skills training examples

Tower Hamlets “Local Labour in Construction”
More London “Building London Creating Futures”
Paddington First “Providing local access to local jobs”
London City Airport “Educating Excellence”

Earl's Court Road



Regeneration Objective 5: Bring investment to local centres

The Earls Court Regeneration Area is envisioned as a mixed-use community featuring a variety of complementary activities – office, residential, arts and cultural, hotel, retail and community – that would attract a range of users throughout the day and the evening. The influx of new workers, residents and visitors to the area as a result of the redevelopment, combined with improvements to the circumstances of existing local residents through improved employment and training opportunities, will bring greater disposable income and increased spending power to the area. Established local retail centres – notably Earl’s Court Road and Fulham Broadway but also the retail strips along North End and Lillie Roads – with their mixes of shopping, restaurant and leisure activities, can expect increased returns from expanded activity in the area. A stronger and sustained market accompanied by increased sales could give business owners the confidence they need to invest in improvements to their accommodation and offering, to the benefit of both themselves and the local area. The character of the retail streets can also be improved through the design and development process.

In the Regeneration Area itself, the right balance of uses must be found to create the type of atmosphere and level of activity necessary to create lasting change in North Fulham. Retail will be an important part of the mix; that necessary to meet the demand of the development alone will generate the activity levels to ensure a successful redevelopment.

More London



Paternoster Square, London



Regeneration Objective 6: Establish a world class business quarter

The introduction of a world class office quarter in this part of West London would build upon its existing role and provide a significant economic boost to Hammersmith and Fulham and Kensington and Chelsea. The range of employment activities and the potential market for local retailers and businesses associated with such development are critical to the regeneration strategy for North Fulham and the continued renewal of Earl's Court Road. The introduction of such a critical mass of activity to the area would offer new employment opportunities to existing residents of both boroughs that could be supported by the training programmes outlined earlier.

By responding to a metropolitan need for business accommodation and creating a distinct and innovative offering, a new point of business reference will be placed on the London map, bringing a new level of interest and attention to the area that could be expected to flow west to Hammersmith and north to White City. Both of these areas are identified in the Hammersmith and Fulham UDP as key nodes of employment activity which will benefit from continued investment. If the borough can offer multiple locations for different types of complementary office development which are well-located and accessible, in close proximity to other complementary amenities, such as shopping and hotels, it will be in an ideal position to benefit from the long-term need for new office accommodation in London.

Barcelona International Convention Center (CCIB)



Le Palais des Congrès de Paris



Vancouver Convention & Exhibition Centre (VCEC)



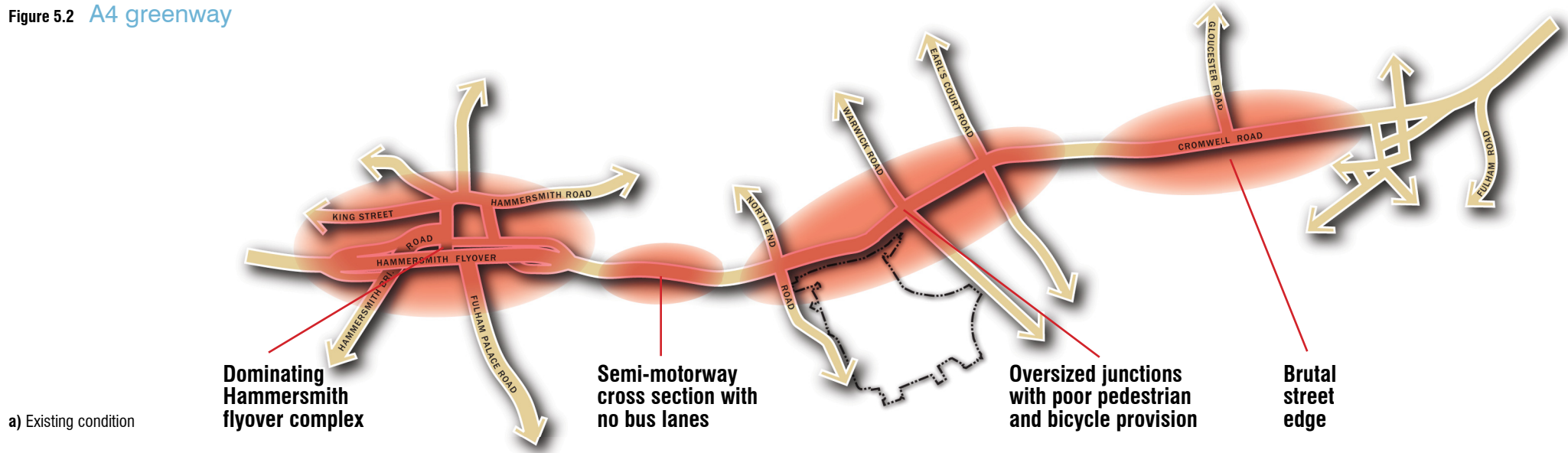
Regeneration Objective 7: Support the principle of an International Convention Centre as part of a scheme including the Olympia and Earls Court complexes

The development of an ICC has, for some time, been on the agenda of the GLA who envision it as an important complement to the unique cultural and business offer for which London is known around the world. One of the key challenges to moving this agenda forward is the identification of an appropriate site that can satisfy a range of financial, physical and logistical requirements.

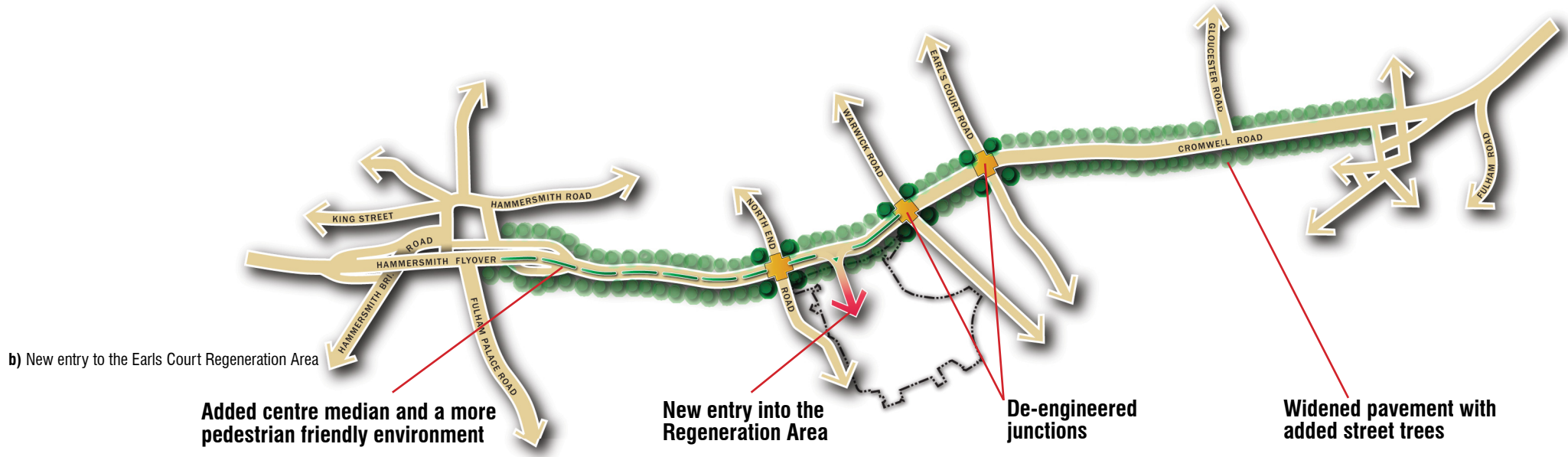
The Borough of Hammersmith and Fulham is interested in the opportunity that an ICC as part of a scheme(s) including the development / redevelopment of the existing Olympia and Earls Court complexes presents. These sites are already identified with large exhibitions and the staging of major events, making them logical places for potentially locating an ICC. In addition, they are well located relative to the cultural, shopping, hotel and entertainment facilities of Kensington and the West End. The Borough sees a potential ICC as an important generator of wealth for local businesses and services. An Olympia location, in particular, presents a credible potential opportunity for an ICC in terms of deliverability, subject to further viability and feasibility assessment. The creation of an ICC at Olympia or within the Earls Court Regeneration Area could support London Borough of Hammersmith and Fulham regeneration objectives by contributing to the success of North Fulham, offering employment opportunities to the local community that fit with the local skill base historically supported by the exhibition activities at Earls Court and Olympia. The area's extensive transport links, including both road and rail, would support the continuation of this type of use at this location. Plans for Crossrail will also enhance accessibility in the future.

Given this potential, further assessments should be undertaken to identify the appropriate location for an ICC.

Figure 5.2 A4 greenway



a) Existing condition



b) New entry to the Earls Court Regeneration Area

Regeneration Objective 8: Improve accessibility to the area

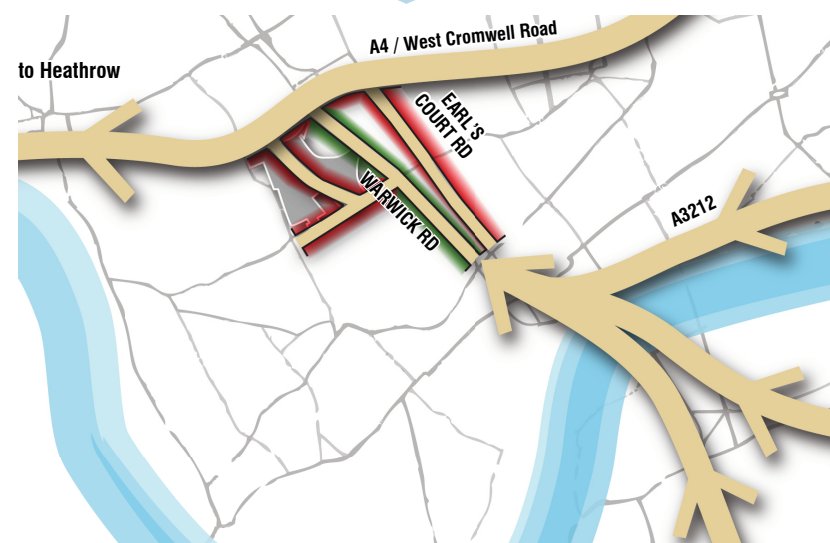
The Earls Court Regeneration Area is well-served by both Underground and Overground lines and has easy connections to major routes into and out of London; however, improvements can be made to achieve a higher level of accessibility by rail and to reduce traffic congestion, while simultaneously supporting an improved pedestrian and cycling environment.

The motorway character of the A4 / West Cromwell Road and the one-way pairing of Earl's Court Road / Warwick Road have resulted in very negative effects on the environment and livability of these important streets. Congestion is also a significant issue in the area. By considering the Earls Court Regeneration Area within a wider traffic management context and its functioning, solutions can be explored for accommodating and ameliorating the effects of through traffic pressures resulting from the current operation of these streets as major arterial roads. Opening up the Regeneration Area and linking it back into the fabric and networks of the surrounding area can assist in spreading traffic loads and redefining these streets as less car dominated and more enjoyable urban environments.

Figure 5.3 Area road improvements

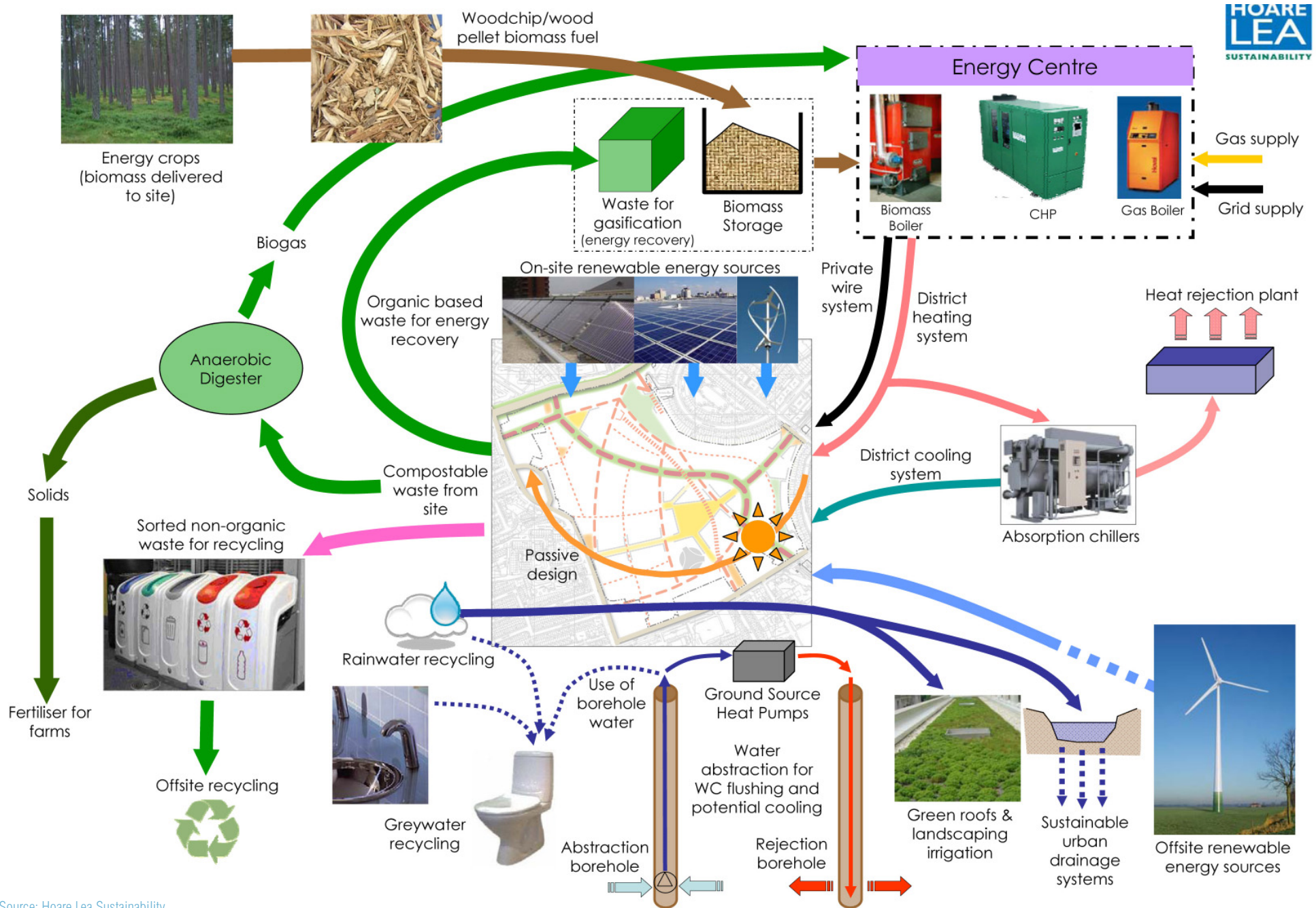


a) The south-to-west movement is funneled through a one-way pair



b) Potentially reinstating two way movement (subject to feasibility and viability) and introducing a third north / south route could provide traffic choice and improve street environments

Figure 5.4 Sustainability opportunities



Source: Hoare Lea Sustainability

Regeneration Objective 9: Build a sustainable community

The Framework is intended to put in place the strategic direction necessary to guide the redevelopment of the Earls Court Regeneration Area. A key aim for the redevelopment will be to deliver a high quality sustainable mixed-use development which will be an asset to the Boroughs of Hammersmith and Fulham and Kensington and Chelsea, to London and to the people who will visit, live and work there. The following guiding principles for sustainability form the basis of the approach to achieve this aim, building on existing Borough and GLA approaches and sustainability initiatives. Together, they seek to maximise the sustainability benefits of a mixed use development, which could be expected to place a more evenly distributed demand on energy and servicing. Informed by a philosophy of research, exploration and investigation into ways of creating a new vibrant and sustainable development, the strategy aims to:

- Use natural resources efficiently
- Create a high quality local environment
- Have low regional and global environmental impact
- Be economically sustainable
- Ensure community infrastructure needs are met locally
- Minimise maintenance requirements

Community recycling facility



Energy / C02 – Low Carbon

A low carbon development will be delivered through, where practicable, efficient community energy infrastructure servicing all buildings and with reduced dependency on the national grid. Building form, massing and orientation will optimise the benefits of the climatic conditions of the area. Solar access to buildings and external spaces will be promoted to make best use of the benefits of natural light for passive heating, to enhance the environment for the occupants and users and to encourage plant growth. The potential for renewable energy sources such as wind, solar energy and biomass to generate energy in the area itself to serve the buildings and thus reduce dependency on fossil fuels will be investigated.

Low Waste

Minimal disposal of waste to landfill will be facilitated, primarily through facilities for recycling. The potential application and integration of vacuum waste systems will be explored.

Materials Procurement

A sustainable approach to materials procurement during construction will minimise material and energy waste through the use of standardised products and optimum use of pre-fabrication, use of recycled and reclaimed materials and minimising embodied energy in construction. Hazardous / toxic substances should be avoided.

Ecology

Green roofs, gardens and courtyards and other features using water will generate biodiversity in the area, contribute to flood risk management and generally enhancing amenities and living space. Green spaces and water features can provide areas of comfortable micro-climate under increasing summer temperatures. Environmental Impact Assessments will be used to investigate and analyse the ecological impacts of the construction strategy, design and landscaping.

Sustainable Water Use and Sustainable Drainage

Water consumption benchmarks and targets will be set based on best practice and standards (e.g. BREEAM, Code for Sustainable Homes, CEEQUAL etc). These targets will govern the performance of the water and drainage systems that are ultimately integrated throughout the development. Sustainable water measures – grey water and

Green roof



Shared bicycle facility



rainwater recycling – will be integrated where appropriate to serve internal and external building requirements.

Travel Demand Management and Low Emission Strategy

Travel Demand Management (TDM) measures will promote sustainable transport choices in the Regeneration Area. Car clubs with low emission vehicles; promoting walking and cycling and the use of public transport; parking ratios below the minimum standards and controlled parking zones; and the use of Green Travel Plans are proactive measures that can define the area as a leader in TDM. Ideally, these initiatives would be implemented alongside a Low Emission Strategy. Reduced reliance on the automobile will assist in efforts by both TfL and the Boroughs to reduce congestion and pollution. It will also support the image of the Earls Court Regeneration Area as an attractive urban environment where residents and employees benefit from improved health and wellbeing and reduced time lost to congestion.

Health and Wellbeing

Access to and provision of external amenities and public spaces will be important for the success of the area as a comfortable urban environment. Sunlight access to amenity spaces would promote the environment required to generate ecological growth and to provide attractive external spaces for the occupants and users of the development. Careful consideration of the arrangement of buildings and locations of building types (retail, office, residential, etc.) will minimise the impacts of noise generated within the development or local to the development. The creation of a well-designed network of open spaces with connections from the Earls Court Regeneration Area to amenities in the community, such as Brompton Cemetery, will serve to enhance the surroundings.

Social and Community Sustainability

The redevelopment of Earls Court will establish a substantial new residential and working population in the boroughs. Attention should be paid to ensuring that adequate provision is made for the anticipated populations in terms of educational, health, training and similar community support facilities. One of the advantages of a development of this scale, and its concentrated ownership, is that the opportunity exists for innovation in the provision, financing and operation of such facilities that does not exist on smaller individual sites.

Federation Square, Melbourne



Regeneration Objective 10: Reinvent the destination

The Earls Court Regeneration Area should be developed as a vibrant, complex, multi-faceted new district in London. It already has the scale, accessibility and brand-name familiarity to be the home to major and minor destinations that would draw both from London and the wider world. Such destinations should be located and designed to add to the activity and interest of this new district in the capital and located to provide image, address and drama to a central space while minimising any functional impacts or 'dark time'.

A number of metropolitan scale destinations are possible candidates. Consideration could be given to the concept of an ICC as part of a scheme involving the redevelopment / development of the Earls Court and Olympia complexes. The area could also be home to a major cultural destination which might be particularly appropriate given the location along a strong cultural corridor stretching from the West End, through South Kensington to the Lyric Theatre and the Apollo in Hammersmith. Future detailed design and development work should explore these possibilities.

Any destination facility should be supported and augmented by retail and restaurant amenities. As previously noted, redevelopment itself will generate significant new spending power to support existing area retail centres. It will be important however not to 'starve' the centre of the Regeneration Area itself from the energy, identity and city-wide draw that a well-designed and targeted retail, restaurant and café presence would bring. Ultimately it will be the whole place, rather than its individual elements, which will become the destination.

Columbus Circle, New York City



St. Christopher's Place, London



Paddington Basin, London



Covent Garden, London



Regeneration Objective 11: Design a unique place

The redevelopment of an area of the scale and importance as the Earls Court Regeneration Area provides an unparalleled opportunity to build on an existing well-known name to create a remarkable new part of the city. London is made up of unique places and districts, each with their own character and history. The Regeneration Area can become a pleasurable destination for work, living, the arts and urban life. This piece of the city can be reconnected to the fabric of the surrounding area to overcome the division caused by the historic development and land use pattern. Thoughtful building design, road linkages, proper arrangement of taller buildings, high quality open spaces and good walking and visual connections to the rest of London are just a few of the vital pieces of the design and development strategy to ensure the area is added to London's collection of memorable locations.

Design strategies:

- Easy connections to surrounding neighbourhoods
- A new recognisable city / national / world destination
- A new London-scale public place that is in itself a destination
- Great urban design focused on the pedestrian and street level
- Fine architecture with the right composition of foreground and background buildings
- An accessible and safe environment
- An attractive addition to the London skyline

Issues

- Issue #1:** Accommodating exhibition uses has disrupted the urban fabric and segregated Earls Court from the area around it.
- Issue #2:** The potential of the council estates is not being maximised.
- Issue #3:** The council estates are designed in a way that prevents their easy integration into the surrounding urban fabric.
- Issue #4:** Railway infrastructure traverses the area, preventing linkages and connections through the Earls Court exhibition area.
- Issue #5:** The railway operations will require ongoing and careful accommodation.
- Issue #6:** Changes in elevations and ground levels and the presence of the West London Line create a challenging topography across the Regeneration Area.
- Issue #7:** The Earl's Court Road / Warwick Road one way system has had a negative impact on the quality of the environment and pedestrian experience.
- Issue #8:** Traffic congestion and air quality are continuing problems in the area around Earl's Court Road / Warwick Road.
- Issue #9:** North End Road is a disjointed and tired commercial street that is not fully benefitting from the prosperity found nearby and experienced at Fulham Broadway and Earl's Court Road.
- Issue #10:** The A4 / Cromwell Road corridor is a dominating feature of the local area, which acts as a divider between the Framework area and the communities to the north.
- Issue #11:** The four major housing estates found in the local area correspond with the areas of most intense deprivation in North Fulham and rank among the top 20% of the most deprived areas in the country.
- Issue #12:** Socio-economic segregation exists alongside wealth and prosperity.
- Issue #13:** Home ownership is currently out of reach for a number of residents.
- Issue #14:** Creation of a sustainable and balanced community in the local area has been hindered by the concentration of social and economic deprivation coupled with housing market conditions which have made accessing home ownership difficult for a range of residents.

Opportunities

- Opportunity #1:** London is a world city that will continue to grow and require new spaces, a need which the Regeneration Area can respond to.
- Opportunity #2:** There are few sites in London that can accommodate substantial new development that will significantly contribute to the capital's needs, making the Regeneration Area one of strategic importance.
- Opportunity #3:** London's economy continues to require new and innovative forms of accommodation in a variety of locations.
- Opportunity #4:** The Earls Court Regeneration Area is not impacted by many of the constraints to growth found in other parts of London.
- Opportunity #5:** London's role as a global business centre for a range of activities, including business services, finance, insurance, creative industries, technology and telecoms, creates a long-term need for new office accommodation.
- Opportunity #6:** London has an on-going need for new quality housing at affordable prices that can meet a range of lifestyle and lifestage needs.
- Opportunity #7:** Continued population growth and the introduction of new residents to the Regeneration Area will create additional need for retail facilities that are complementary to existing designated retail centres.
- Opportunity #8:** The Greater London Authority has been exploring for some time the creation of an International Convention Centre (ICC) in central London. The Borough of Hammersmith and Fulham is exploring the possibility of locating an ICC within its boundaries, with a scheme(s) involving development/ redevelopment of Olympia and Earls Court complexes being examined.
- Opportunity #9:** International visitor nights in London are on the rise and the Regeneration Area presents an opportunity to cater for visitor demand for hotel and related leisure uses.
- Opportunity #10:** The Earls Court Regeneration Area is situated at the intersection of central and west London, vector of high demand for both business and residential location, with few opportunities for major development.
- Opportunity #11:** The area is one of London's most connected with transport links at the local, metropolitan, regional and national scales, providing an opportunity for a highly accessible and sustainable development.
- Opportunity #12:** The surrounding Conservation Areas are important features of both boroughs which can both complement new development and be enhanced by the sensitive introduction of new buildings, open spaces and uses.
- Opportunity #13:** Brompton Cemetery is a valued community resource which can both complement new development in the area and benefit from it by the new connections the Regeneration Area can offer.
- Opportunity #14:** The potential for new residential uses in the area is promoted in the *Warwick Road Planning Brief*.
- Opportunity #15:** The local area has many strong neighbourhoods that could support and reinforce regeneration efforts.
- Opportunity #16:** Redevelopment of the Earls Court Regeneration Area in a manner that is outward looking and which engages with adjacent areas would have positive impacts for the existing local community.
- Opportunity #17:** The public and private sectors are poised to together take on the challenges of social and economic deprivation, housing mobility, environmental quality and other regeneration issues present in this part of the borough.
- Opportunity #18:** The redevelopment of the Earls Court Regeneration Area to achieve multiple objectives and significant positive impacts for stakeholders is supportive of Hammersmith and Fulham's regeneration initiatives.

6.0

Scenarios for the Future of the Earls Court Regeneration Area

6.1 Three Options for the Future

The preceding sections of the Framework describe a series of issues and opportunities from the local up to the metropolitan scale which establish the context for the potential redevelopment of the Earls Court Regeneration Area. They also set the stage for the preparation of a series of alternative options for regeneration. Three such alternatives are presented below. Each seeks to present a different approach to the future of the Regeneration Area, while responding to established and emerging policy directions.

Option #1

Option #1 proposes that the Regeneration Area is redeveloped as a collection of discrete areas. This option would include:

- An infill-based estates renewal programme that would entail the introduction of new buildings to the Council properties.
- Redevelopment of the Earls Court 1 and 2 sites primarily with residential uses, along with a small amount of office, hotel and neighbourhood-related retail and restaurant uses.
- The depot area would remain undeveloped. Accommodating the rail lines and access to the area would be challenging if development of the site was not part of a comprehensive redevelopment of the entire Regeneration Area.

Option #2

Under Option #2, the Regeneration Area would be redeveloped comprehensively. A residential-led development is proposed, complemented by neighbourhood-related retail and restaurants and community uses.

Option #3

Option #3 also proposes a comprehensive approach to redevelopment of the Regeneration Area. A mixed-use development is suggested combining residential, office, retail and restaurants, hotel and local community uses. A Destination Development is also included. The option seeks to realise the potential of the Regeneration Area by maximising the density within it.

6.2 Evaluation of the Options

Each of the three options presented above has been evaluated against the 11 Regeneration Objectives presented in Section 5.0 in order to determine which best unlocks the regeneration potential of the area. Two measures were used in the evaluation process – compatibility and achievement.

Each option has been evaluated for its compatibility with each of the objectives according to the following scoring system:

√ = Compatible¹⁵ with objective

X = Incompatible¹⁶ with objective

D = Depends on implementation

0 = No significant interaction

? = Relationship uncertain

For each “√ = Compatible with objective” result, a further score was given based on how well the option achieved the objective. The following scoring system was used:

√ = Achieves¹⁷ objective

√√ = Exemplar achievement of objective

The results of this evaluation are presented in the tables on the following pages.

¹⁵ Is in keeping with general intent of the objective.

¹⁶ Is not in keeping with the general intent of the objective.

¹⁷ Accomplishes the objective to an acceptable degree.

Table 1: Evaluation of Option #1

Regeneration Objective	Score		Comments
	Compatibility	Achievement	
1	X	—	An infill-based programme of estates renewal would not bring about the change necessary to fully rebalance the community. The challenging design of the estates layout would make filling the gaps a difficult challenge and likely result in only a nominal increase in the number of units. The estates would still be characterised by concentrations of residents in difficult circumstances, reinforcing current deprivation.
2	D	—	The infill development on the council estates and the residential development on the Earls Court 1 and 2 sites could provide some limited opportunity to introduce innovative housing programmes available to both existing area residents and new residents.
3	X	—	As a primarily residential-led proposal, Option #1 would not generate the economic activity necessary to support a substantial number of jobs.
4	X	—	In the absence of employment activity, skills and training programmes would be difficult to support.
5	√	√	The introduction of some new residents with greater disposable income, primarily to the Earls Court 1 and 2 sites, would bring increased spending power to the area to support local businesses and services, albeit more limited than with the other options.
6	X	—	Lacking a significant office component, this option would not support the establishment of a world class business quarter.
7	X	—	A primarily residential-led development would not provide the setting and uses complementary to a potential ICC or other cultural, destination or leisure venue(s).
8	X	—	Without the TfL property included in the option, enhancing access to the Regeneration Area and reconnecting it to the urban fabric would be challenging. Specifically, the introduction of a new north / south route through the Regeneration Area would not be possible.

Table 1: Evaluation of Option #1 (Continued from the previous page)

Regeneration Objective	Score		Comments
	Compatibility	Achievement	
9	D	—	The ability to deliver a sustainable community would be considerably hindered if each landowner moves forward on their own. This approach will not support an integrated approach to sustainable infrastructure and the planning and investment necessary to put it in place. Smaller scale measures that can be implemented by single landowners on individual parcels / buildings (ie. green roofs) would be possible.
10	X	—	A primarily residential-led scheme would not introduce uses that would support the Earls Court Regeneration Area as a destination in its own right.
11	X	—	Infill on the council estates would not support the change necessary to create a unique new place. While the Earls Court 1 and 2 sites would be well-designed and of high quality, a primarily single use district could not become an interesting and unique place in London.

Table 2: Evaluation of Option #2

Regeneration Objective	Score		Comments
	Compatibility	Achievement	
1	√	√ √	The comprehensive redevelopment of the entire Regeneration Area would include the full regeneration of the council estates and provide the opportunity to diversify and increase the residence base.
2	√	√ √	The significant amount of housing that would be introduced over the entire Regeneration Area would be sufficient to offer a range of housing types, tenures and affordability.
3	D	—	If the amount of office development reaches the upper end of the floor area range indicated for this option, it could be sufficient to support a sizeable number of jobs.
4	√	√	The amount of office development proposed could be sufficient to support a small skills and training programme linking local jobs and local residents.
5	√	√	The introduction of new residents and workers with greater disposable income would bring increased spending power to the area to support local businesses and services.
6	X	—	The amount of office development proposed is not sufficient to support the establishment of a world class business quarter.
7	X	—	A site developed primarily with residential uses would not provide an appropriate setting for a potential ICC or other cultural, destination or leisure venue(s).
8	X	—	The redevelopment of the entire Regeneration Area with primarily one use would not support a balanced use of the transport network and would more likely overload the road and rail infrastructure as residents will need to commute to other locations for employment.
9	X	—	Building an integrated sustainable community would not be possible if a single primary use (residential) is the focus of the development.

Table 2: Evaluation of Option #2 (Continued from the previous page)

Regeneration Objective	Score		Comments
	Compatibility	Achievement	
10	X	—	The specific scale of development and the mix of uses proposed under this option would be unlikely to provide the critical mass and vitality necessary to really define the Earls Court Regeneration Area as a special and unique place in London.
11	√	√	Redevelopment of the full Regeneration Area would provide the opportunity for unique design approaches and ideas, though the scale of the development and the mix of uses proposed may not provide the critical mass and vitality necessary to truly redefine the area.

Table 3: Evaluation of Option #3

Regeneration Objective	Score		Comments
	Compatibility	Achievement	
1	√	√ √	The comprehensive redevelopment of the entire Regeneration Area would include the full regeneration of the council estates and provide the opportunity to diversify and increase the residence base.
2	√	√ √	The significant amount of housing that would be introduced over the entire Regeneration Area would be sufficient to offer a range of housing types, tenures and affordability.
3	√	√ √	The amount of office development proposed and the range and amount of ancillary uses would be sufficient to support a sizeable number of jobs.
4	√	√ √	The amount of office development proposed and the range and amount of ancillary uses would be sufficient to support a comprehensive training and development programme.
5	√	√ √	The introduction of new residents and workers with greater disposable income would be sufficient to bring increased spending power to the area to support local businesses and services.
6	√	√ √	The amount of office development proposed is sufficient to support the establishment of a world class business quarter.
7	√	√	A potential ICC or other leisure, cultural or destination venue(s) would be an appropriate development to accompany the proposed mix of uses. Careful consideration would need to be given to siting to ensure benefits from transport infrastructure and a suitable relationship with adjacent uses. Further study would be required to understand viability.
8	√	√ √	The redevelopment of the entire Regeneration Area would allow for a full consideration of transport requirements and issues in the area and beyond, as well as allowing for and improving funding of the improvements needed. A mix of uses will promote a balanced use of the area's transport infrastructure.

Table 3: Evaluation of Option #3 (Continued from the previous page)

Regeneration Objective	Score		Comments
	Compatibility	Achievement	
9	√	√ √	Building an integrated sustainable community would be possible. Comprehensive redevelopment of the full area, major infrastructure and community services would be planned and provided in a comprehensive, efficient manner; area-wide travel demand management is possible, and; open spaces can be connected to surrounding neighbourhoods. The intended use mix would maximise opportunities for energy efficiency strategies.
10	√	√ √	The scale of development and the mix of uses proposed under this option would provide the critical mass and vitality necessary to really define the Earls Court Regeneration Area as a special and unique place in London.
11	√	√ √	Redevelopment of the full Regeneration Area with the proposed mix and amount of uses would provide the opportunity to create a memorable location.

6.3 The Preferred Option

Based on the evaluation of the three options against the Framework Regeneration Objectives, it is concluded that Option #3 best meets the objectives. This option is the only one of the three which is compatible with all 11 Regeneration Objectives, and offers the possibility of exemplar achievement of all but one of the objectives. A comprehensive redevelopment as presented under Option #3 can maximise opportunities for sustainable regeneration of the Earls Court Regeneration Area.



7.0

A Development Structure for the Preferred Option

A basic direction has emerged from the preceding wider scale London and Borough analysis and the options appraisal that can now be refined into structuring principles that will guide development of the area itself. At 27 hectares, the Earls Court Regeneration Area is a uniquely large area in West London that can accommodate a wide range of uses in a way that makes a unique contribution to achieving policy goals at the metropolitan and local scales.

This section of the Framework elaborates on the overall structuring framework within which development activity could take place. It starts with examining the transport capacity that could be available for such a scale of development. It examines the options for increasing rail transport capacity for the contemplated range of uses and the road network required to service the development. The broad desirable pattern of land use, built form, open spaces and the location of future key features are described. All of these items are placed within the overall goal for the Earls Court Regeneration Area – to create a great new place for London and an encouraging new presence in the Boroughs.

7.1 Transport Strategy

The Earls Court Regeneration Area can be the location of a substantial new development, responding to planning policies that seek to locate major new developments in proximity to transport infrastructure. With minimal car parking provision, the proposal would promote Borough policy aims to address congestion in the area. While the development itself will place new requirements on the existing transport infrastructure, the implications of the new demands generated by the area have been assessed and are reflected in the transport strategy summarised below.

Rail Service

Rail connections in the Earls Court Regeneration Area are extensive and provide important links at all geographic scales – local, metropolitan, regional and national – for residents, workers and visitors alike. The following proposals are aimed at ensuring that the level of service and extent of connections are in place to both support and accommodate the Earls Court Regeneration Area scheme and the evolution of the surrounding area. By creating demand in the west of the central city and stimulating investment in the transport infrastructure, redevelopment of the Regeneration Area will help to balance overall patterns of public transport use across London.

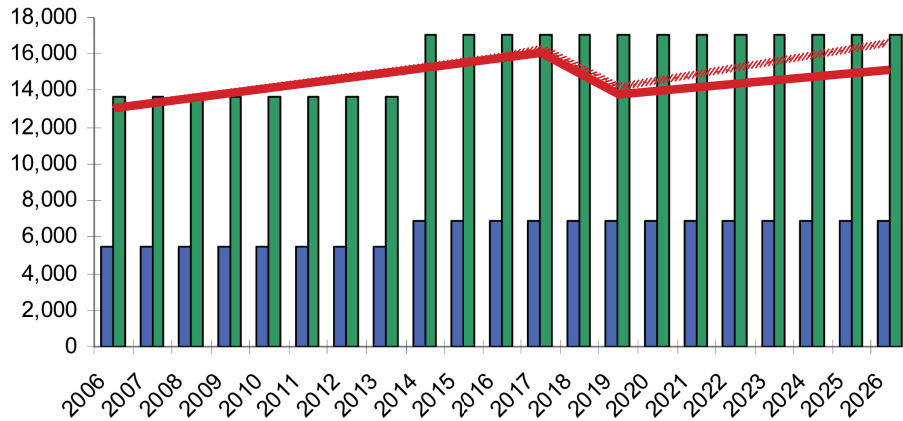
Increase Capacity on the Underground and Overground

Plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. Their successful delivery is necessary to ensure the full redevelopment of the Earls Court Regeneration Area as a sustainable mixed use district. Residents, workers and visitors will depend on the presence of reliable transport networks with capacity to accommodate them.

PPP upgrades due by 2017 are planned for the eastbound Piccadilly and District Lines, as well as part of the District Line between West Brompton and Earl's Court stations, bringing significant additional capacity to each. Providing a new option for those travelling east / west, Crossrail will also assist in further reducing congestion by diverting passengers from some of the most heavily traveled Underground routes. Collectively these improvements create the significant new rail capacities necessary for a complete development of this scale and can accommodate, with some enhancements, the movement demands anticipated.

Subject to detailed demand forecasting, specific improvements over and above those already contemplated under the PPP and Crossrail initiatives may be required in the AM peak inbound to increase services and / or capacity to the West London Line and to relieve inbound congestion on the District Line from Putney. Introducing station entrances within the Regeneration Area will ensure the transport infrastructure is as accessible as possible.

Figure 7.1 Piccadilly Line – Eastbound departure from Earl’s Court at the AM peak hour

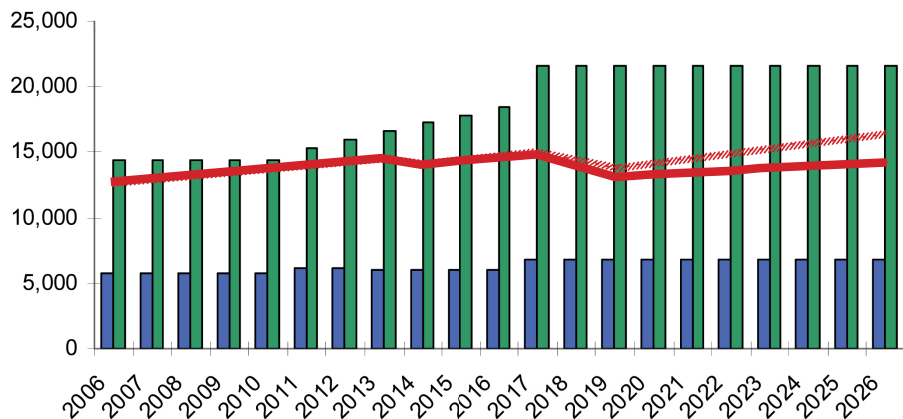


Piccadilly Line

The PPP improvements to the eastbound Piccadilly Line due in 2014 will result in a 25% increase in frequency, at which point capacity will exceed demand in the peak hour. The opening of Crossrail in 2017 is expected to improve capacity further as some passengers shift from the Underground to this new service. With these works complete, demand resulting from the development in the Earls Court Regeneration Area can be accommodated.



Figure 7.2 District Line – Eastbound departure from Earl’s Court at the AM peak hour

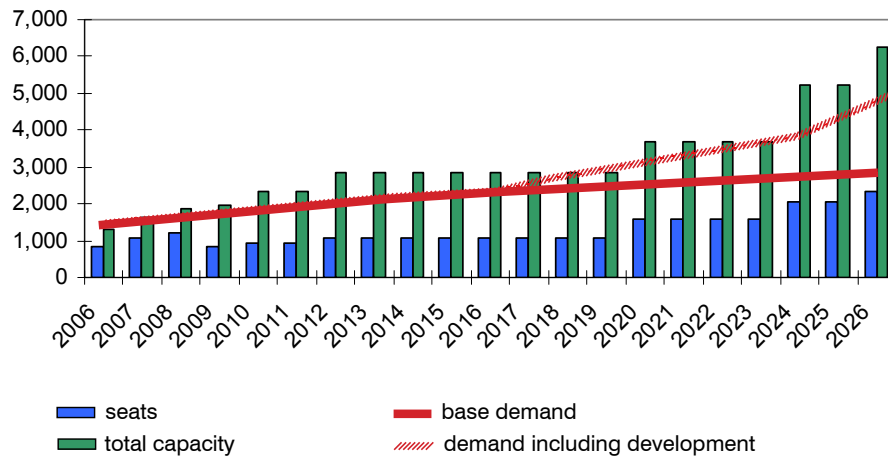


District Line Eastbound

The eastbound District Line is currently running with spare capacity in the peak hour at Earl’s Court station. Development of the Earls Court Regeneration Area could easily be accommodated following minor frequency increases and the introduction of new trains between 2012 and 2017, PPP improvements by 2017 and Crossrail, which is expected to lead to some passengers shifting to the Piccadilly Line.



Figure 7.3 West London Line – Northbound departure (including District Line Wimbledon branch excess development demand) at the AM peak hour



West London Line (including District Line Wimbledon branch)

Together, the Wimbledon branch of the District Line and the West London Line provide north / south rail service from the Regeneration Area. The Underground connects northwest and southwest London, while the West London Line is an important link in the plans for an orbital rail network in London, for which enhancements to the Overground network are supported.¹⁸ Both are scheduled for upgrades and increases in service over the medium and long-term.

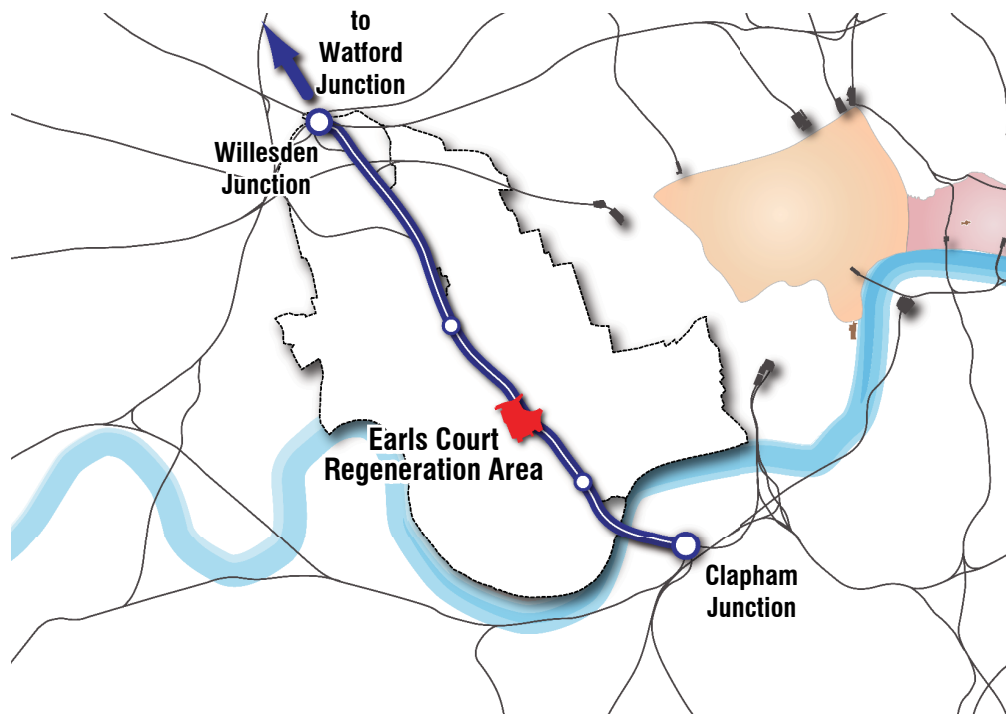
Despite these improvements, capacity in the northbound direction on these two lines will not be sufficient to meet the needs of London as it grows. A number of options have been explored for further services that would address the issue of capacity in the northbound direction and ensure that development in the Earls Court Regeneration Area is as accessible as possible once in place. While further detailed study is required, the resulting recommendations for northbound travel are two-fold.

The first recommendation is to increase the baseline level of service on the West London Line by adding the following in 2024:

- 2 trains between Clapham Junction and Willesden Junction
- 4 services from the East London Line / Queens Road Peckham route (2 go to Clapham Junction and 2 go to Willesden Junction)
- 1 Southern train calling all stations to Shepherd’s Bush

¹⁸ See London Plan Policy 3C.12.

Figure 7.4 West London Line



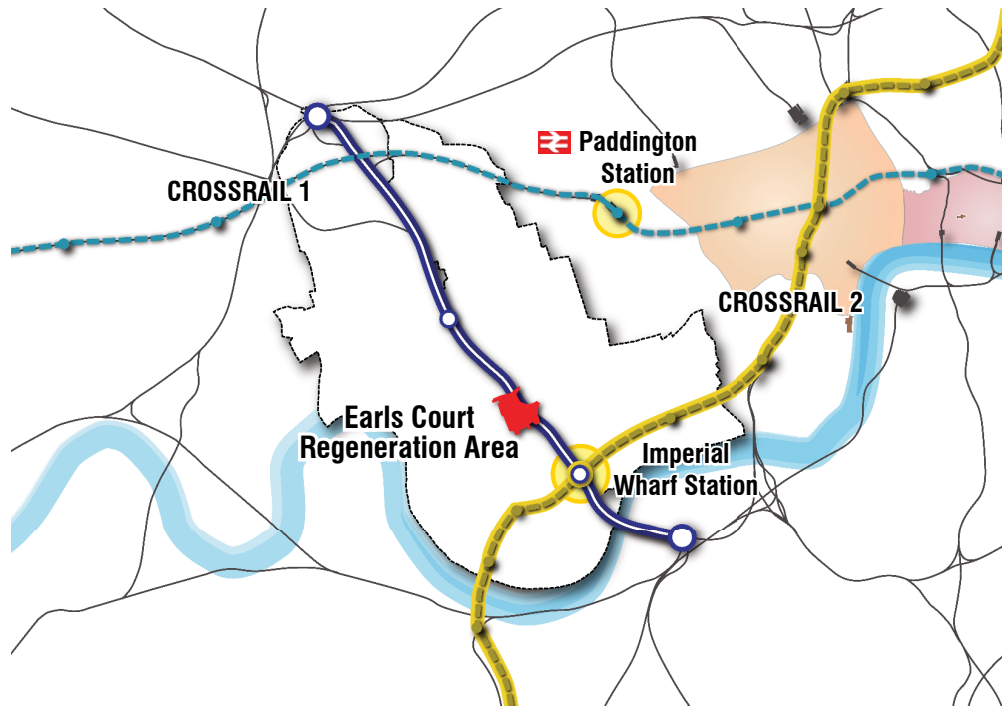
The second recommendation would ensure substantial additional capacity in the network despite development in the Regeneration Area. In 2026, an additional service on the West London Line from Clapham Junction to Watford Junction will supply an increase of nearly 2,000 new passenger spaces. Trains would run on the West London Line to Willesden West London Junction, where they would then run on the Willesden relief lines to Sudbury Junction. At Sudbury Junction they would join the slow lines, providing connections to Wembley Central, Harrow and Wealdstone and Watford Junction. This additional service would allow more frequent service on the West London Line:

Clapham Junction to Watford Junction
<ul style="list-style-type: none"> • 23 more trains per day (though the last evening service would finish at Shepherd's Bush) • 2 more trains during the morning peak between 8:00 and 9:00am
Watford Junction to Clapham Junction
<ul style="list-style-type: none"> • 22 more trains per day • 2 more trains during the morning peak between 8:00 and 9:00am

By extending the service north to Watford Junction, a further hourly connection between the West London Line and the West Coast Main Line would be added. Changes to the existing schedules would impact some freight movements, which would need to be adjusted or cancelled to allow the proposed service extension.

By introducing the two alterations described above, excess demand on the Wimbledon branch can be shifted to the West London Line, resulting in overall spare capacity northbound during the course of the redevelopment of the Earls Court Regeneration Area.

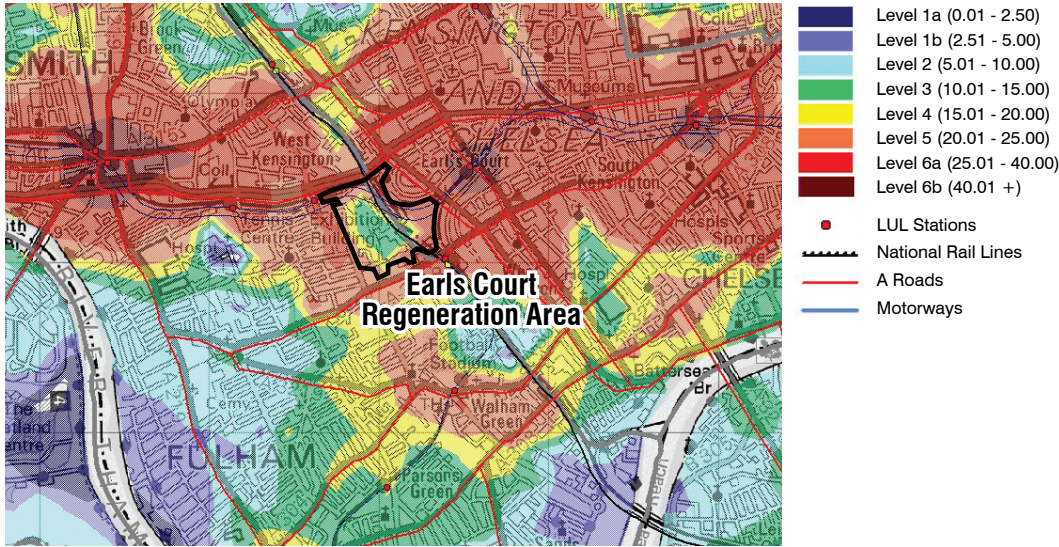
Figure 7.5 Crossrail 1 and 2



Chelsea Hackney Line (Crossrail 2)

The new Imperial Wharf Station in south Fulham is now under construction, adding another station to the West London Line and enhancing accessibility in both Hammersmith and Fulham and Kensington and Chelsea. The station has been suggested for inclusion in the Chelsea Hackney Line (Crossrail 2) extending from southwest to northeast London, which would provide additional travel possibilities in proximity to the Earls Court Regeneration Area. Through the Safeguarding Direction for the line released by the Department for Transport in June 2008, the Boroughs are required to continue ensuring development does not negatively impact the route or the ability of Transport for London to undertake works proposed as the project is developed. Efforts should be made to ensure the Imperial Wharf station remains connected to the route of the Chelsea Hackney Line as planning moves forward.

Figure 7.6 PTAL for the Earls Court Regeneration Area



This map shows the relative levels of access provided by public transport using LB Hammersmith & Fulham's PTAL method.

This map is for illustrative purposes only, the data has not been verified.

Map revised March 2005

Figure 7.7 Existing and proposed station entrances (5 min walking radius from the new entrances)



Extend Existing Stations into the Regeneration Area

The current entrances of the Underground and Overground stations serving the Earls Court Regeneration Area are all located on the periphery of the area. Public transport accessibility levels (PTALs) to any redevelopment would be greatly improved by creating new entrances or extending platforms to provide points of entry closer to its centre. While further detailed study is required, opportunities for enhancing accessibility are possible at each station:

Earl's Court station: The existing tunnel connection beneath Warwick Road, between Earls Court 1 and the Underground station could be refurbished and reopened to provide a link from the station to the area. A new entry plaza on the west side of Warwick Road, and a redeveloped station entrance to the east, would also improve the sense of arrival.

West Brompton station: A new exit could be created at the existing forecourt to Earls Court 2, accessed by walkways on either side of the West London Line from the existing platforms 3 and 4. The walkway from platform 3 could also serve the northbound District Line. Linking the southbound District Line is somewhat more challenging but would be possible with a new bridge in the existing station to platform 1 (as is in place now to access platform 4).

West Kensington station: A new exit could be created in the middle of the Regeneration Area, on the northern edge of the existing Earls Court 2 platform, to provide a point of entry at the heart of the area.

London bus

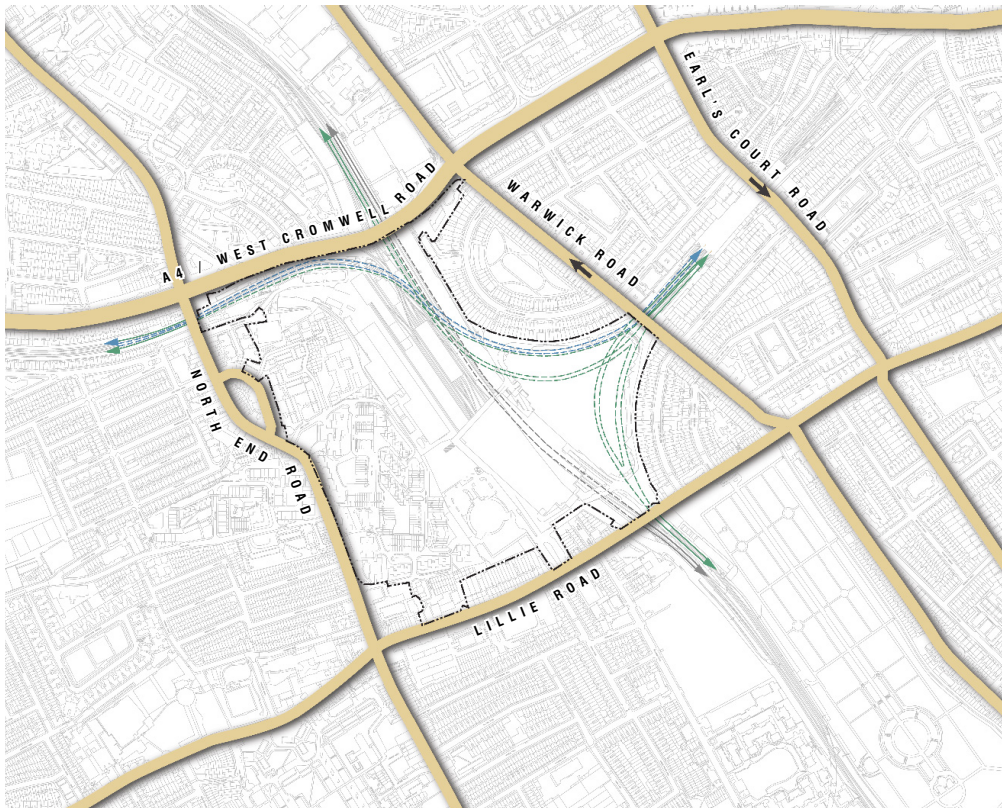


Bus Service

A reliable and comprehensive bus service through and around the Earls Court Regeneration Area would be an essential element to integrating it into the wider – local and metropolitan – transport network and to providing sustainable transport options. The following initiatives should be further explored as ways of achieving these objectives:

- Create a new bus interchange to allow easy interchanges with other modes
- Extend existing bus routes into the Regeneration Area
- Increase the frequency of existing bus service
- Provide bus links to key locations and areas lacking high-speed Underground or rail connections
- Improvements to night bus service

Figure 7.8 Existing road network



Road Network

The Earls Court Regeneration Area is currently poorly connected to the surrounding road network, and because of its current pattern of uses and rail lines, is inadequately served internally for the types and intensity of uses contemplated through redevelopment. While the specific alignments and connectivity of any future road system would be dependent on the character of that redevelopment, the following structuring elements would be necessary.

Figure 7.9 Proposed environmental improvements at West Cromwell Road / Warwick Road



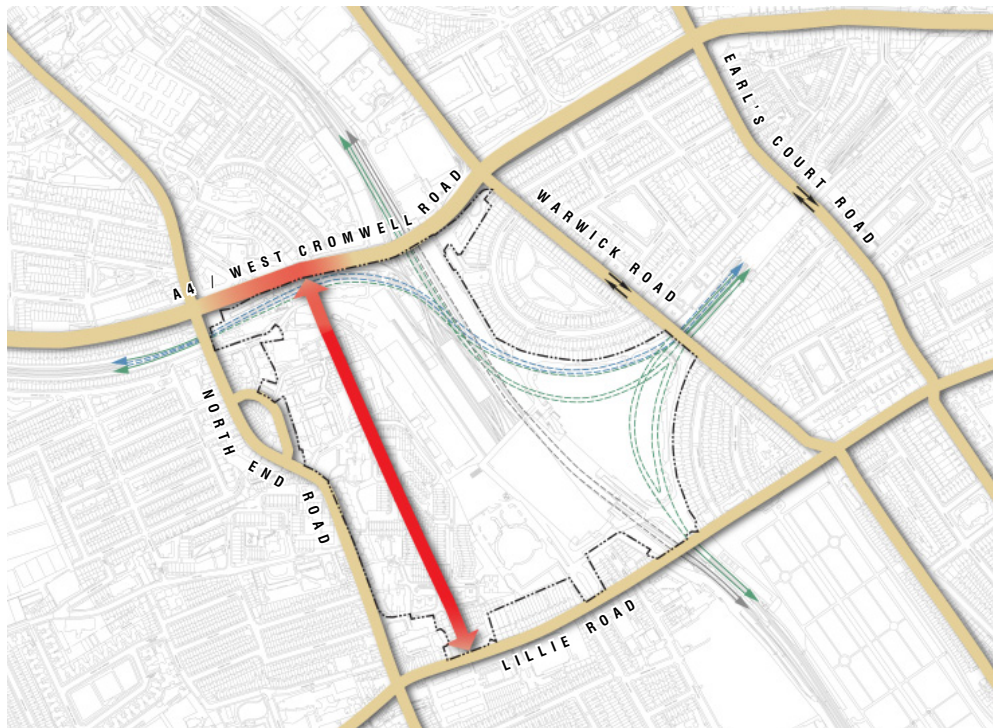
Source: 100 Cromwell Road Draft Planning and Design Guidelines

A4 / West Cromwell Road

The development of the Earls Court Regeneration Area would benefit from a major entrance from the A4 / West Cromwell Road. A new junction with the proposed north / south road (see below) offers the opportunity to identify the area from this important access corridor with a well-designed entrance, providing visibility, image and access to the development to the south.

At the same time, the construction of this new junction and of a major development along the southern edge of a significant length of road frontage would provide the opportunity to remediate the currently negative environmental quality of this stretch of the corridor. Designed as part of a coordinated improvement with new junction design, bicycle and bus lanes and street landscaping, improvements to this portion of the A4 / West Cromwell Road would address a missing link in the GLA proposals for improvements to the corridor. Extending from Hogarth Roundabout in Chiswick east to Earl's Court Road, this portion of the corridor (ie. A4 / West Cromwell Road at North End Road to Warwick Road) is currently not included in the plans. The opportunity for an integrated approach to the re-design of the corridor has been captured in Kensington and Chelsea's *100 West Cromwell Road Draft Planning and Design Guidelines* which seeks wider public realm enhancements along the corridor and north up Warwick Road as part of the site's redevelopment.

Figure 7.10 North / south link road



North / South Link Road

A new north / south road connecting Lillie Road and the A4 / West Cromwell Road corridor would provide both essential accessibility to the core of the Regeneration Area and also provide a critical new link in the overall highway network in the area. Such a new road connection would be intended to break down the current isolation of the area where the exhibition uses are presently located, making it a part of the fabric of London and the surrounding districts, while avoiding becoming a 'rat run' for through traffic.

As well as providing local access into the Regeneration Area, the link could also cater for some strategic through traffic. A proposed alignment and possible junction geometries for the link road have been identified for further development as part of the detailed design for the area. The capacity of the route would be constrained by the approach junctions at the north and south access points but should assist in relieving congestion within parts of the Earl's Court Road / Warwick Road one-way system. By so doing it would allow for improvements to the environmental quality of this pair of streets. The diversion of some strategic traffic volumes from those streets to this new road would also assist in their reorganising to allow for a more pedestrian, bicycle and bus friendly design.

Service Routes

Redevelopment of the scale contemplated would generate a considerable amount of service traffic. Service routes could take advantage of the topographic and rail clearance level changes occurring across the Regeneration Area. There are potential alignments that could follow the main north / south track corridor; one could run north from Lillie Road at the bridge location to the west of the tracks.

Amsterdam, Netherlands



Further detailed studies would be undertaken in association with a specific development proposal to determine the alignments and design of these routes.

Secondary Routes

The north / south route would permit secondary connections to the surrounding street system, increasing the permeability of the Regeneration Area and providing access to future development parcels. There is potential for an east / west route through the area, although the desirability of such a connection should be assessed in relation to any specific development proposal. Such a connection is made more complicated by the grading requirements necessitated by clearance of the railway and LUL lines. All secondary streets would be designed to prevent “rat running”, and provide amenity and priority to pedestrians, cyclists, vehicles and where appropriate, buses.

Cyclist and Pedestrian Friendly Design

The environment and permeability of the Regeneration Area would be greatly enhanced through a design approach prioritising cyclists and pedestrians. A network of connections could link roads, pedestrian connections and pathways leading to important destinations, such as the Underground stations, major public open spaces and shopping, and connect the area to adjacent neighbourhoods. Extensions to the London Cycling Network should be an integral feature of this network. The design of the overall network should provide a hierarchy of connections, the logic of which can easily be understood by residents as well as visitors. The elements of the network – roads, pathways, etc. – should provide sufficient space and a public realm to ensure a comfortable walking or cycling experience.

Figure 7.11 Organising concepts (conceptual only)



The Grand Avenue Option



The Grid Option



The Organic Option



The Crescent Option

7.2 Organising Structure

The road and access network described above sets out the connectivity requirements for a development of the scale proposed in the indicative land use budget. Within such a network a number of organising concepts for the Regeneration Area would be possible, allowing the flexibility essential for future design. Four conceptual arrangements are shown in Figure 7.11: Organising concepts, illustrating the range of development alternatives that basic road structures could accommodate. While four alternatives are presented, further detailed design work may result in additional options or a combination of these alternatives.

The Grand Avenue

An urban parkway is extended north / south through the area, providing a strong structuring element and establishing a clear identity for the area.

The Organic Plan

A less rectilinear road system provides a more varied pattern of streets and blocks and resolves many of the inherent complexities of the area.

The Grid

A regular grid of north / south and east / west streets creates an even distribution of districts, each potentially with their own identity, and a standardised block pattern.

The Crescents

The traditional crescent street pattern of West London is extended west to provide a structure that generally reflects that of the wider area.

7.3 Land Use Pattern

The market analysis indicates significant levels of demand for all the major land use activities considered for the Regeneration Area. The objective would be to have a mixed development in the Earls Court Regeneration Area, as is currently under exploration by the two Boroughs through their LDF Core Strategy work. The particular requirements of individual land uses and the nature of the surrounding district suggest a strong logic as to how different uses should be arranged.

Residential Development

A significant amount of residential development would be appropriate across the Regeneration Area. Given its size and increasing accessibility, the area can support the sustainable delivery of a considerable amount and mix of housing required in the area and support the commitment by the Borough of Hammersmith and Fulham to ensure existing council estate residents can be provided with new homes in the local area, wherever possible.

Some differentiation must be made between the best locations for the various types of residential development envisioned for the Regeneration Area. The centre of the area, given its high accessibility and distance from adjacent neighbourhoods, suggests higher apartment housing forms. The strong character of the crescents to the east suggests a street-related form, such as a contemporary form of mansion blocks and high density maisonettes. The mansion blocks to the northwest of the area also suggest an attractive precedent in scale and form for the western edge. The need for larger, more family-oriented units would respond to this overall pattern of scale and form. Regardless of the housing form, careful design attention will be required to achieve residential accommodation that is “tenure-blind” and defined by its high quality design and not its ownership or tenant status.

Accordia development, Cambridge



Kensington High Street, London



Office Development

Two general areas would appear most appropriate for office development. The visibility of the A4 / West Cromwell Road frontage provides good access and road connectivity. The centre of the Regeneration Area, located between the Underground and Overground stations, also provides good accessibility. A connecting spine of office locations could be arrayed along the north-south spine.

Retail Development

The overall retail planning goal would be to provide sufficient retail activity to make the development an interesting and attractive new urban district able to service the population that would live and work there, while ensuring that such provision is complementary to and not competitive with the important existing retail centres and streets in the wider area as well as White City, which is already easily accessible from the area.

Three strategies seem appropriate. First, the development should be designed to complete and augment the currently interrupted and lower quality of retail along the Lillie Road and North End Road frontages, and specifically to support their rejuvenation through residential-led redevelopment, physical and environmental improvements with appropriately located clusters of neighbourhood shops. Second, the higher intensity and strengthened accessibility of the centre of the area suggests a need to focus retail, restaurant and cultural activity with sufficient critical mass to animate a central place (or places) that can become a significant London wide destination. Additional nodes of activity will be identified through the master planning process. Third, the Regeneration Area is large and will be accommodating a substantial living and working population, and some areas particularly to the north and east will have no ready convenience shopping. Some local retail clusters at appropriate places would also be desirable.

Swiss Cottage Leisure Centre, London



Destination Development

A destination development is an appropriate addition to the proposed mix of uses. It supports the sustainable transport objectives from the local to the metropolitan level and the desire to make the Earls Court Regeneration Area a unique part of London that is known for its special sense of place. While further work is required for this element of the redevelopment, the following considerations could be key to identifying such a use and locating it in the Regeneration Area:

- Locations that maximise proximity to Underground stations
- The need for expansion space
- The need for a visible location
- The opportunity for a unique building that is identifiable from the A4 / Cromwell Road corridor
- The need for hotel and leisure uses to be located nearby

Community Clusters

A development of this scale will bring a significant number of new residents to the area, creating the need for a full range of new community facilities, including schools, doctor's surgeries, crèches and other services. The Regeneration Area seems naturally to break down into a series of quadrants, each of which should be identified by a cluster of service retail activity, open space and any required community facilities to create a sense of local identity, particularly in areas at some distance from local streets. The exact needs and locations for new community infrastructure would be determined at the detailed planning stage.

Brompton Cemetery, London



Through the LDF process, Kensington and Chelsea is exploring opportunities to expand the use of Brompton Cemetery

Broadgate Exchange Square, London



7.4 Open Spaces and Public Realm

The location and pattern of open spaces would be determined through a master plan for the Regeneration Area. Future design work should establish a hierarchy of open spaces, comprised of different types of open space that would benefit from the overall quality of the new district and its surroundings, while also responding to adjacent land uses and activities. Explorations in innovative approaches to the provision, design and management of open space and other significant public realm areas should be pursued, such as public / private / shared use and provision of open space on multiple levels.

A significant open space (or spaces) should be established in the centre of the Regeneration Area with good accessibility to Earl's Court and West Brompton stations with the character, design quality and adjacent animating uses and activities that would make it a major destination. A green link to West Brompton Cemetery could provide a strong connection to what is already a cherished community asset and which may in future become a more active open space under Borough plans to add the cemetery to its collection of recreation spaces.

Any significant destination attraction proposed for the area – such as a conference centre, museum / gallery or other facility – is likely to be most appropriately located in relation to a major open space. Each of the other quarters of the area could feature its own open space, with a character appropriate to the surrounding uses.

All open spaces and public realm features should be designed to the highest quality. Design competitions and other mechanisms should be encouraged to access new thinking and innovation in the design and development of open spaces, public art and even infrastructure that can contribute to making Earls Court Regeneration Area a unique place to be.

Figure 7.12 Options for arranging height

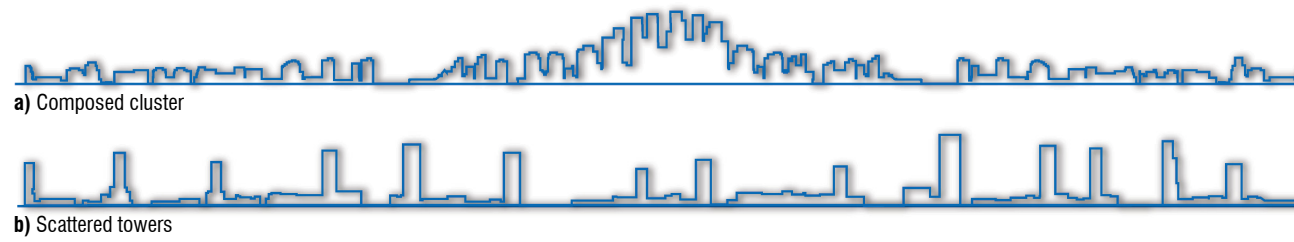


Figure 7.13 Existing heights in the area

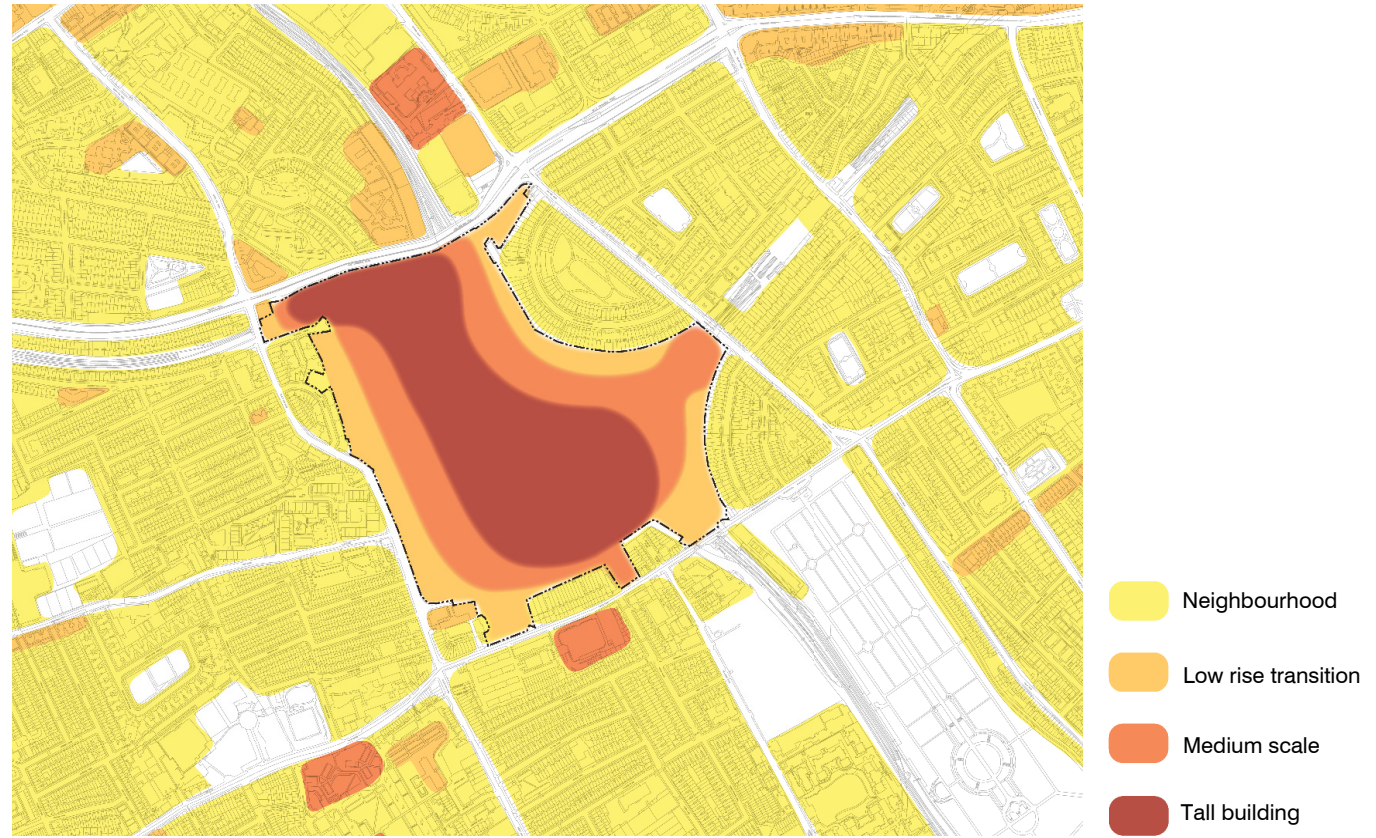


7.5 Heights and Views

The Earls Court Regeneration Area is large enough and its centre at a sufficient distance from adjacent neighbourhoods to be an appropriate location for taller buildings. Locating tall buildings in the area would maximise the opportunity presented by its size, strategic location, high level of connectivity and the significant development programme that implies. Thoughtfully sited and designed, tall buildings can help to create a sense of place that is interesting and varied – important considerations when planning and designing an area of the scale of the Earls Court Regeneration Area. They would also be key to the development of a unique and identifiable image for the proposed business district, which would be achieved through quality design and character of international standard.

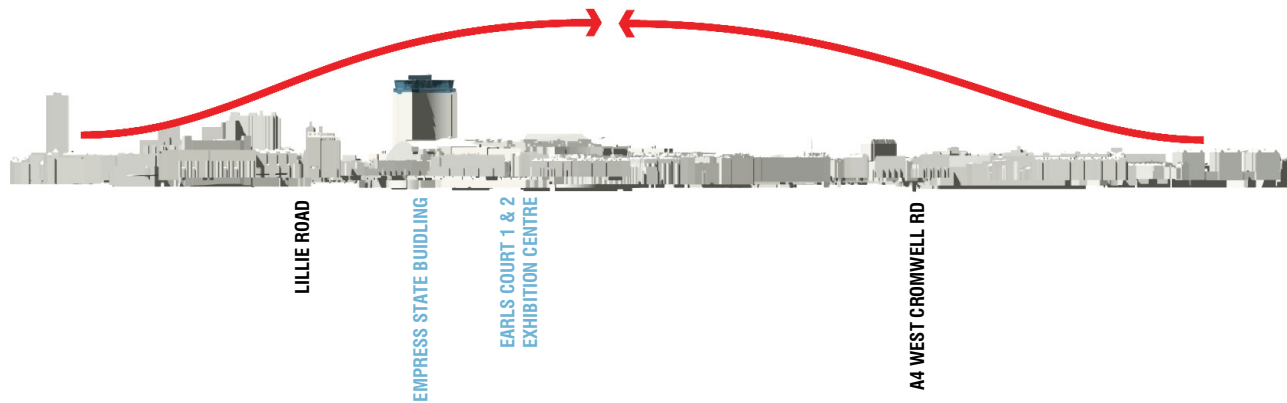
A major development must however be planned with a high degree of sensitivity in the deployment of taller buildings if views of the area are not to be intrusive and the skyline of the development is to be an attractive addition to the profile of London. The area represents something of a relief valve for tall buildings in London. It is relatively unaffected by protected views defined by the *London View Management Framework* (July 2007) and the previous RPG3, and views and vistas from the locally sensitive locations. Local and district views, such as that from Brompton Cemetery, would have to be taken into account at the time of detailed design. With relatively few sites in and around Central London as unconstrained as the Earls Court Regeneration Area, it is an important location for appropriately sited tall buildings.

Figure 7.14 Potential height plan



Note: The Tall Building category indicates where tall buildings could be appropriately located in the Regeneration Area. It is not intended to imply that the entire portion of the Regeneration Area indicated as Tall Building will be occupied by only tall buildings.

Figure 7.15 Height strategy

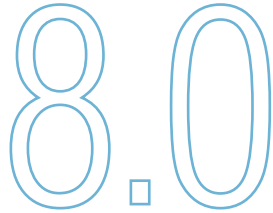


Clustering of taller buildings into attractive composed groupings is consistent with current planning directions and provides an alternative to isolated, more intrusive, high buildings on individual smaller sites scattered through the boroughs (see Figure 7.12: Options for arranging height). The current *London Plan* supports the development of tall buildings where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and / or act as a catalyst for regeneration (Policy 4B.8). Draft planning policy from Kensington and Chelsea recognises the benefits of sites with good transport connections along the western border of the borough as potential locations for tall buildings. The Borough's *Towards Preferred Options* publication for their LDF identifies the portion of the Earls Court Regeneration Area in the borough as a Major Development Site, which could potentially accommodate tall buildings.

The general pattern of heights in and around the Regeneration Area at present is of low to medium scale, with some significant exceptions (see Figure 7.13: Existing heights in the area). The Earls Court complex is of very substantial bulk and reaches up to an effective 18 storeys and is highly visible from the surrounding area. The Empress State Building is 31 storeys and the TfL building to the north is 9 storeys. Isolated higher buildings are found along Lillie Road and Cromwell Road.

This height context and the proper respect for views of the development from the surrounding neighbourhoods and wider city suggest locating taller buildings along a 'ridge' of height running north / south through the centre of the Regeneration Area, scaling down to make compatible transitions in scale to the surrounding areas (see Figure 7.14: Potential height plan). While attention to these local relationships is important, attention must also be paid to the collective composition of individual taller buildings, to its urban profile, when seen from a distance – something that should be deliberately sculpted to achieve an appropriate feature in the evolving landscape of London (see Figure 7.15: Height strategy). Such clusters would be preferable to scattered towers.





A Framework for the Earls Court Regeneration Area

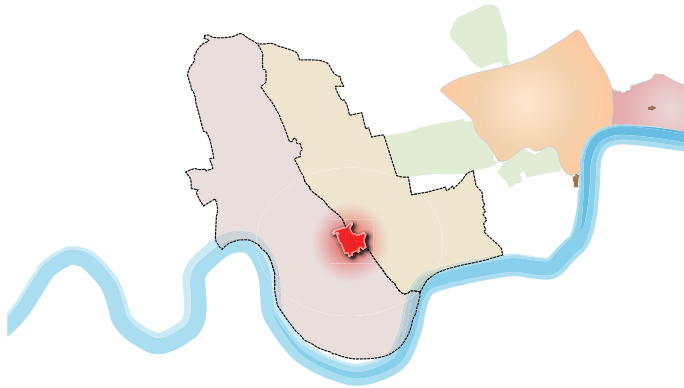
Preceding sections have provided a detailed analysis of the metropolitan context and market demand, set out an area regeneration strategy, transport plan and structuring principles, collectively contributing to the central objective of creating at Earls Court a new urban place in London – a place Borough residents, works and visitors can all be proud of and that will contribute to the future of the city and make a difference to the neighbourhoods surrounding it.

This section has derived from that analysis a set of specific principles that can guide the redevelopment of the Earls Court Regeneration Area and future investment by both public and private sectors throughout the wider area. They are structured at the various scales at which policy and planning will have a bearing on further planning and design work.



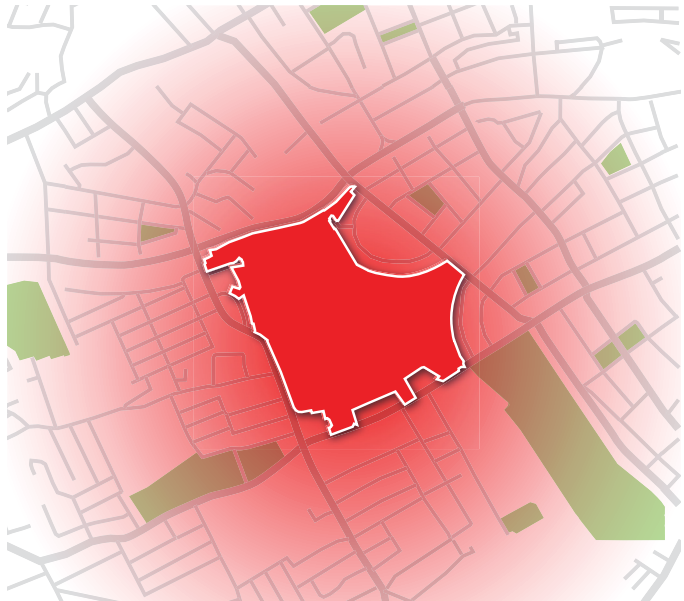
At the London scale, development of the Earls Court Regeneration Area should:

- L.1 Help meet the population and employment targets established to direct London's growth and prosperity over the medium and long-term
- L.2 Make a strategic contribution to the continuing strength of the London economy
- L.3 Develop so as to relieve growth pressure on smaller, less appropriate development sites
- L.4 Accommodate growth while enhancing open space, views and other valued features of London
- L.5 Play a key economic role in the success of the West London Corridor
- L.6 Establish a model of public transport-led development
- L.7 Add a new urban district to the richness and diversity of working, living in and visiting London
- L.8 Create an attractive new built profile to the landscape of London as an example of appropriate intensification



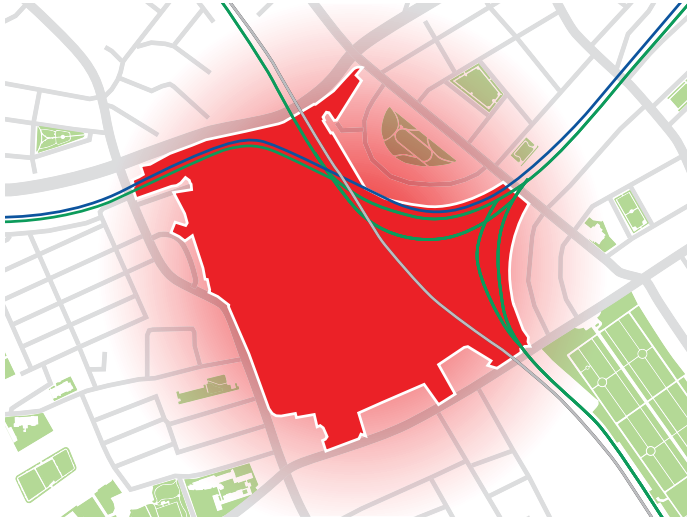
At the borough scale, development of the Earls Court Regeneration Area should:

- B.1** Direct growth-required development away from more sensitive areas of the boroughs
- B.2** Establish a vital new component of economic infrastructure in the area
- B.3** Contribute to the success of surrounding major retail centres
- B.4** Contribute to the usage, convenience and connectivity of the area's public transport system
- B.5** Provide new community facilities



At the district scale, development of the Earls Court Regeneration Area should:

- D.1** Connect to surrounding streets, neighbourhoods and open spaces and overcome the isolation of the area
- D.2** Accommodate a development of significant scale and intensity while respecting important qualities of local character
- D.3** Support the health of local retail streets and the North End Market by adding to their continuity and market capture
- D.4** Contribute to the environmental quality of Warwick Road, Earl's Court Road and A4 / West Cromwell Road through traffic management and streetscape improvements
- D.5** Provide a range of new affordable housing



At the area scale, development of the Earls Court Regeneration Area should:

- A.1** Undertake a substantial development of a scale appropriate to the size, location, transport accessibility and development opportunity that is available
- A.2** Ensure a wide variety of building uses and forms to ensure the creation of an interesting, sustainable, diverse new London district with the flexibility to grow and change in the future
- A.3** Create a strong, connected structure of streets, buildings and open spaces that makes the development an integrated new London district rather than an isolated development
- A.4** Introduce a north / south street connection between Lillie Road and A4 / West Cromwell Road that can provide accessibility to the core of the area and contribute to the environmental improvement of the area street network without encouraging 'rat-running'
- A.5** Connect to local streets where possible to add permeability and linkages between the Regeneration Area and its surroundings
- A.6** Explore the desirability of an east / west street to provide access to the core of the area and overall connectivity
- A.7** Design streets to inhibit rat-running and promote a strong pedestrian character with provision for bicycles and buses where required
- A.8** Focus new office development along the A4 / West Cromwell Road corridor and in the centre of the area closest to Underground and Overground stations

- A.9** Establish an important retail presence in the centre of the area with local retail activity distributed in the various local districts of the development
- A.10** Encourage residential development throughout the development to optimise the mix of activity
- A.11** Establish a major central space that has the design quality, critical mass of adjacent uses and accessibility to become one of London's great places
- A.12** Locate any destination attractions – conference centre, museums, galleries etc – in relationship to the central space
- A.13** Support the central space and related destinations with a unique retail and restaurant offer
- A.14** Provide interesting attractive, usable and maintainable open spaces throughout the development
- A.15** Ensure a pattern of heights that concentrates taller buildings generally north / south through the centre of the area to form an attractive, composite, urban profile
- A.16** Respect the quality of views of the development from important places and the adjacency of local conservation areas
- A.17** Become a unique interesting, attractive, well-designed new district of buildings, spaces, activities with a sense of place that adds to London's richness



9.0

Implementation and Delivery

A redevelopment project of the scale proposed by the Framework is an exciting opportunity, one that comes with incredible potential to achieve many varied objectives and to create a wonderful new place. Creation of such a place will require detailed implementation and delivery plans which will take some time to prepare; however, the following are some initial proposals around topics key to implementation and delivery – phasing, consultation and Section 106.

9.1 Phasing

A redevelopment project of the scale proposed in the Framework will be implemented through a series of phases. Further detailed work around phasing will be undertaken during the master planning and detailed design stages of the scheme development. The following principles would guide the phasing strategy that will result to ensure a logical programme of work:

- The living standard of local communities and the council estate residents must be given a high priority
- The accommodation needs of council estate residents during redevelopment should be provided in the local area wherever possible
- Provision of retail, amenities and appropriate social / community facilities must accompany each phase of the development
- Develop a sufficient amount office space to establish a critical mass of floorspace
- Phasing plans should be coordinated with transport improvements

9.2 Consultation and Engagement

The Framework and the redevelopment proposals it describes are aimed at establishing the Earls Court Regeneration Area as a new part of Hammersmith and Fulham and Kensington and Chelsea. The scale of the potential change is both exciting and substantial. There are existing communities and neighborhoods in the area, and a range of other stakeholders, who necessarily need to participate in the detailed planning and design of the regeneration scheme. As work moves forward, stakeholder engagement and consultation will be an important part of the process. The consultation to be undertaken will provide clear opportunities for the local community and other stakeholders to make their views known and to participate in the planning and design of the proposals. Consultation will be guided by the requirements of *PPS1 Creating Sustainable Communities*, *PPS3 Housing* and the Boroughs' respective *Statements of Community Involvement*.

9.3 Planning Gain

PPS1 establishes the ability of local planning authorities to utilise planning obligations, referred to as “Section 106 Agreements”, as “compensatory measures” when impacts of development proposals cannot be otherwise mitigated. Planning obligations are legal agreements entered into by local planning authorities and developers alongside planning permission. The agreement commits the developer to undertake certain actions required by the authority, or contribute in benefit or in kind towards measures to make the scheme acceptable in planning terms. The overall extent of the planning obligation includes what is reasonable given the scale of the proposed development, its impact and the requirements of the local development plan.

Reflecting the objectives of both Boroughs for the long-term social and economic sustainability of the Regeneration Area, planning obligations may include the provision of community and social infrastructure, affordable housing, employment initiatives, transport improvements, public realm enhancements and related benefits.

A redevelopment project the scale of that proposed by the Framework for the Earls Court Regeneration Area will bring important benefits to the local area. It will also create new needs for many of the items set out above. As the proposal moves forward and further work is undertaken to detail the regeneration scheme, discussions on the potential Section 106 obligations will clarify how the benefits and needs can best be balanced.



10.0

Conclusion

The Framework establishes an inspiring and exciting way forward for the Earls Court Regeneration Area. It identifies and articulates a new vision for a part of London that has not yet reached its full potential, but which could contribute so much to the success of the two Boroughs in which it sits and to London as a whole. London is a world city that will continue to grow and attract new residents and workers. Its individual boroughs and communities have a key part to play in providing accommodation for new and existing residents, together with employment and other opportunities, integrating with improvements to the quality of the surrounding environment. Creating a new destination that is identified as a desirable place to live, work and a community which can showcase exemplar design and sustainability, the Earls Court Regeneration Area is a rare and unique development opportunity which should be pursued.



Appendix 1

Current London Plan Policy Framework



The London Plan

The *London Plan* is the Mayor's spatial development strategy which provides a strategic framework for the capital's ongoing development and growth, taking into consideration the social, economic and environmental factors impacting the capital's growth for the coming 15 to 20 years. The Plan sets out a variety of objectives to be achieved across London, particularly for strategically important developments of the scale contemplated in the area, which the Earls Court Regeneration Area project successfully responds to.

Positioning London

- The Mayor, LDA and TfL will, and all other strategic agencies should, ensure that the development of London as a global business centre supports the spatial and economic development of Europe and the UK and that London's growth supports the future growth of the 'core cities' (Policy 1.1)

Sustainability and Energy

- The Mayor will, and boroughs and other stakeholders should promote, support and encourage the development of London in ways that secure the plan's social, environmental and economic objectives. This will include using the following criteria:
 - Optimise the use of previously developed land and vacant or underutilised buildings
 - Ensure development occurs in locations that are currently, or will be, accessible by public transport, walking and cycling
 - Take account of the suitability of sites for mixed use development and the contribution that development might make to strengthening local communities and economies including opportunities for local businesses and for the training of local people (Policy 2A.1)
- Ensure future developments meet the highest standards of sustainable design and construction (Policy 4A.3)
- Facilitate and encourage the use of all forms of energy efficiency measures and renewable energy where appropriate (Policy 4A.7)

Housing

- Increase the supply of housing in Hammersmith and Fulham and Kensington and Chelsea by the established targets – 450¹ and 350 homes per year, respectively (Policy 3A.1)
- Seek to exceed the targets and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality. Identify new sources of supply having regard to redevelopment of low density commercial sites to secure mixed use development. Intensification of housing provision through development at higher densities where consistent with the principles of sustainable residential quality (Policy 3A.2)
- Ensure development proposals achieve the maximum intensity of use compatible with local context, *London Plan* design principles and with public transport capacity (Policy 3A.3)
- Provide housing choice in terms of mix of sizes and types, taking into account the varying needs of residents and building to ‘Lifetime Homes’ standards (Policy 3A.5)
- Encourage large residential developments (and accompanying suitable non-residential uses) in areas of high public transport accessibility (Policy 3A.7)
- The strategic target for affordable housing provision is 50%, with a London-wide objective of 70% social housing and 30% intermediate, and the promotion of mixed and balanced communities (Policy 3A.9)
- Seek the maximum reasonable amount of affordable housing from residential and mixed-use schemes, having regard to borough affordable housing targets and the need to encourage rather than restrain residential development and the individual circumstances of the site (including site costs, availability of public subsidy and other scheme requirements) (Policy 3A.10)
- Require affordable housing provision on a site which has capacity for 10 or more homes (Policy 3A.11)
- Prevent loss of housing, including affordable housing, without its replacement at existing or higher densities (Policy 3A.15)

¹ This target has recently been increased to 650 units / year by the Borough.

Employment

- Provide a range of premises of different types, sizes and costs to meet the needs of different sectors of the economy and firms of different types and sizes and to remove supply side blockages for key sectors, including the finance and business services sectors (Policy 3B.1)
- To meet office demand and supply:
 - Seek a significant increment to current office stock through changes of use and development of vacant brownfield sites
 - Seek the renovation and renewal of existing stock to increase and enhance the quality and flexibility of London's office market offer, in line with policies for maximising the intensity of development
 - Seek the provision of a variety of type, size and cost of office premises to meet the needs of all sectors, including small and medium sized enterprises (Policy 3B.2)

Transport

- Ensure the integration of transport and development by:
 - Encouraging patterns and forms of development that reduce the need to travel especially by car
 - Improving public transport capacity and accessibility, where it is needed, for areas of greatest demand and areas designated for development and regeneration
 - Supporting high trip generating development only at location with high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect the levels of public transport accessibility (Policy 3C.1)
- Support sustainable transport:
 - Support measures that encourage shifts to more sustainable modes and appropriate demand management
 - Improve provision of bus services, cycling and pedestrian facilities and local means of transport to improve accessibility to jobs and services for the residents of deprived areas (Policy 3C.3)
- Improve links between London and the surrounding regions (Policy 3C.5)
- Improve the strategic public transport system by extending the East London Line and other enhancements to the London Overground network, which incorporates the West London Line and the Barking – Gospel Oak Line, and through further extensions of the East London Line, towards completion of an orbital rail network (Policy 3C.12)
- Ensure road scheme proposals contribute to economic regeneration and development, provide a net benefit to London's environment, improve safety and conditions and integrate with local and strategic land use planning policies (Policy 3C.16)

Town Centres and Retailing

- Develop and enhance the network of International, Metropolitan, Major, District and specialist centres (Policy 2A.8)
- Identify more local and neighbourhood centres and those with distinct roles in meeting special needs (Policy 2A.8)
- Enhance access to goods and services and strengthen the wider role of town centres by:
 - Enhancing the quality of retail and other consumer services in town centres
 - Supporting a wider role for town centres as locations for leisure and cultural activities, as well as business and housing and their key role in developing a sense of place and identity for sustainable local communities (Policy 3D.1)
- Prevent the loss of retail facilities that provide essential convenience and specialist shopping and to encourage mixed use development (Policy 3D.3)

Tourism, Visitor Accommodation and Facilities

- Enhance the quality and appeal of London's existing tourism offer and create integrated and sustainable tourism provision in town centres and other locations across London with good public transport access (Policy 3B.9)
- Achieve 40,000 net additional hotel rooms by 2026 and improve the quality, variety and distribution of visitor accommodation and bring forward an international convention centre:
 - Develop new hotels in areas with good public transport access to central London and international and national transport termini
 - Accommodate smaller scale provision in CAZ fringe locations with good public transport and resist further intensification of provision in areas of existing concentration, except where it will not compromise local amenity or the balance of local land uses
 - Support existing and encourage development of new tourist attractions which complement the wider policies of this plan, especially for regeneration and town centre renewal (Policy 3D.7)

Design

- Ensure that developments should:
 - Maximise the potential of sites
 - Promote high quality inclusive design and create or enhance the public realm
 - Provide or enhance a mix of uses
 - Contribute to adaptation to, and mitigation of, the effects of climate change
 - Respect local context, history, built heritage, character and communities
 - Provide for or enhance a mix of uses
 - Be accessible, usable and permeable for all users
 - Be sustainable, adaptable and durable in terms of design, construction and use
 - Address security issues and provide safe, secure and sustainable environments
 - Be practical and legible
 - Be attractive to look at, and, where appropriate, inspire, excite and delight
 - Respect the natural environment and biodiversity
 - Address health inequalities (Policy 4B.1)
- Promote world-class high quality design (Policy 4B.2)
- The Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings. The Mayor will, and boroughs should, consider all applications for tall buildings against the criteria set out in Policies 4B.1, 4B.3 and 4B.9.

- The Mayor will work with boroughs and the strategic partnerships to help identify suitable locations for tall buildings that should be included in UDPs and Sub-Regional Development Frameworks. These may include parts of the Central Activities Zone and some Opportunity Areas.

Boroughs should take into account the reasons why the Mayor may support tall buildings when assessing planning applications that are referable to the Mayor. Boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their UDPs. In doing so, they should clearly explain what aspects of local character could be affected and why. They should not impose unsubstantiated borough-wide height restrictions.

In considering applications for tall buildings, the Mayor will take into account the potential benefit of public access to the upper floors and may require such access (Policy 4B.8)

- All large scale buildings including tall buildings should be of the highest quality and design and in particular:
 - Meet the requirements of the View Management Framework
 - Be attractive city elements as viewed from angles and where appropriate contribute to an interesting skyline, consolidating clusters within that skyline or providing key foci within views (Policy 4B.10)



Appendix 2

EVALUATION OF FRAMEWORK
REGENERATION OBJECTIVES AGAINST
EMERGING CORE STRATEGY OBJECTIVES

Purpose of the Evaluation

In order to ensure compatibility of the Framework Regeneration Objectives with the emerging Core Strategy Objectives for each of the two Boroughs – Hammersmith and Fulham and Kensington and Chelsea – an evaluation of the Framework objectives against those for each of the boroughs was undertaken.

Each of the Framework Regeneration Objectives was considered against each of the borough objectives based on the following scoring system.

- ✓ = Compatible with objective
- X = Incompatible with objective
- D = Depends on implementation
- 0 = No significant interaction
- ? = Relationship uncertain

The detailed results of this evaluation are presented in the tables below.

The overall conclusion from this exercise is that the Regeneration Objectives are in keeping with those emerging through the respective borough LDF processes.

Objectives

The following lists the objectives from the Framework and the Core Strategy Objectives identified through the Borough LDF processes.

Framework Regeneration Objectives

The following 11 items are the Regeneration Objectives expressed in the Framework:

1. Regenerate the estates and rebalance the community
2. Offer housing choices
3. Create a ladder of employment opportunity
4. Close the skills gap
5. Bring investment to local centres
6. Establish a world class business quarter
7. Support the principle of an International Convention Centre as part of a scheme including the Earls Court and Olympia complexes
8. Improve accessibility to the area
9. Build a sustainable community
10. Reinvent the destination
11. Design a unique place

London Borough of Hammersmith and Fulham Draft Core Strategy Objectives

The Borough of Hammersmith and Fulham has put forth 20 Core Strategy Objectives through the LDF process:

1. Create decent neighbourhoods throughout the borough, and, in particular, regenerate the most deprived parts of the borough, especially in White City, West Kensington/North Fulham and Hammersmith.
2. Increase the supply and choice of high quality housing and ensure that the new housing meets local needs and aspirations, particularly the need for affordable home ownership and for homes for families.
3. Renew and transform key council housing estates to decent neighbourhoods principles.
4. Build on the borough's attractions for arts and creative industries.
5. Ensure the best use of vacant and underused brownfield land throughout the borough.
6. Reduce polarisation and worklessness to create more stable, mixed and balanced communities.
7. Support the local economy and inward investment to ensure that existing and new businesses can compete and flourish; and seeking an International Convention Centre for London within the existing Earls Court and Olympia complexes.
8. Support businesses so that they maximise job opportunities and recruit and maintain local people in employment.
9. Regenerate H&F's Town Centres to improve their viability and vitality and sustain a network of supporting key local centres providing local services.
10. Ensure that that both existing and future residents, and visitors to the borough, have access to a range of high quality facilities and services, including retail, leisure, recreation, arts, entertainment, health, education and training and other community infrastructure.

11. Ensure that the schools in the borough meet the needs and aspirations of local parents and their children.
12. Encourage and promote healthier lifestyles and reduce health inequalities.
13. Promote the safety and security of those who live, work and visit H&F.
14. Improve and protect amenity and quality of life of residents and visitors by ensuring a safe, accessible and pleasant local environment, where there is a strong sense of place.
15. Conserve and enhance the quality, character and identity of the borough's natural and built environment through good quality, inclusive and sustainable design.
16. Protect and enhance the borough's open green spaces, promote biodiversity and protect private gardens.
17. Increase public access and use of H&F's waterways as well as enhance their environment, quality and character.
18. Reduce and mitigate the local causes of global warming and climate change, mitigate flood risk and improve the sustainability of new development.
19. Ensure there is a high quality transport infrastructure, including a Crossrail station and a High Speed 2 rail hub to support development in the borough and improve transport accessibility and reduce traffic congestion and the need to travel.
20. Ensure that regeneration meets the diverse needs of not only the H&F of today, but also all its future residents and visitors.

Royal Borough of Kensington and Chelsea Draft Core Strategy Objectives

The Borough of Kensington and Chelsea has identified seven Core Strategy Objectives:

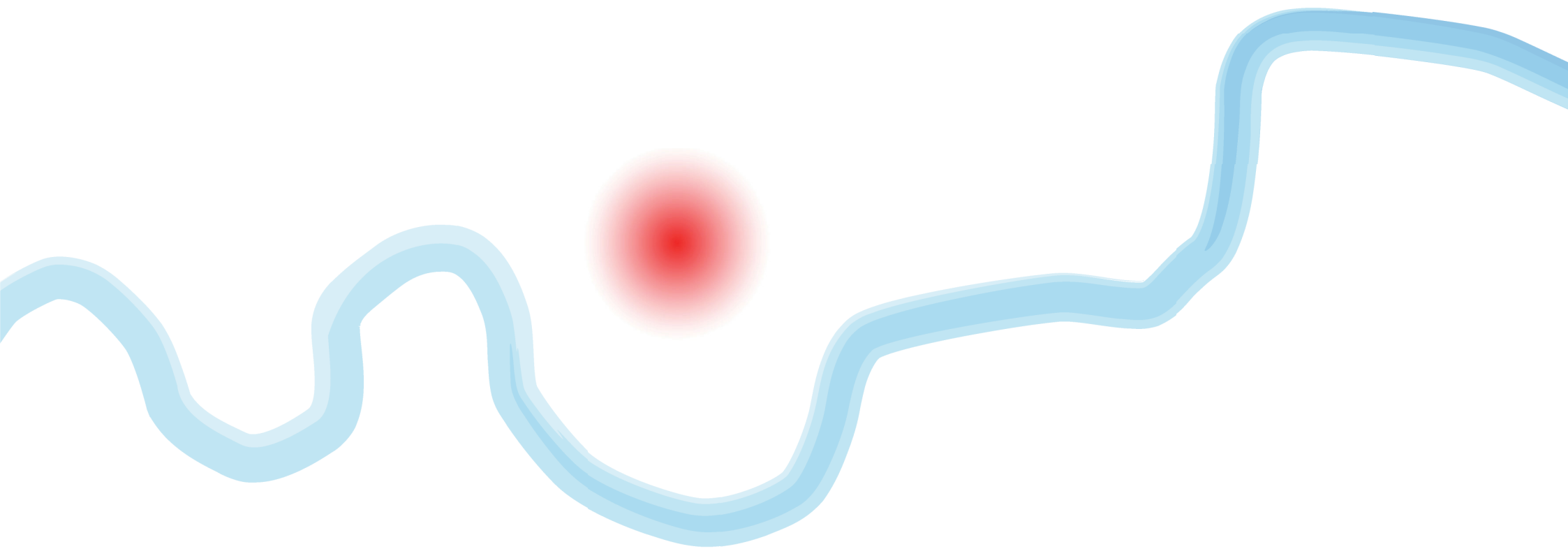
1. Keeping life local
2. Fostering diversity
3. Better travel choices
4. Caring for the public realm
5. Renewing the legacy
6. Diversity of housing
7. Respecting our environmental limits

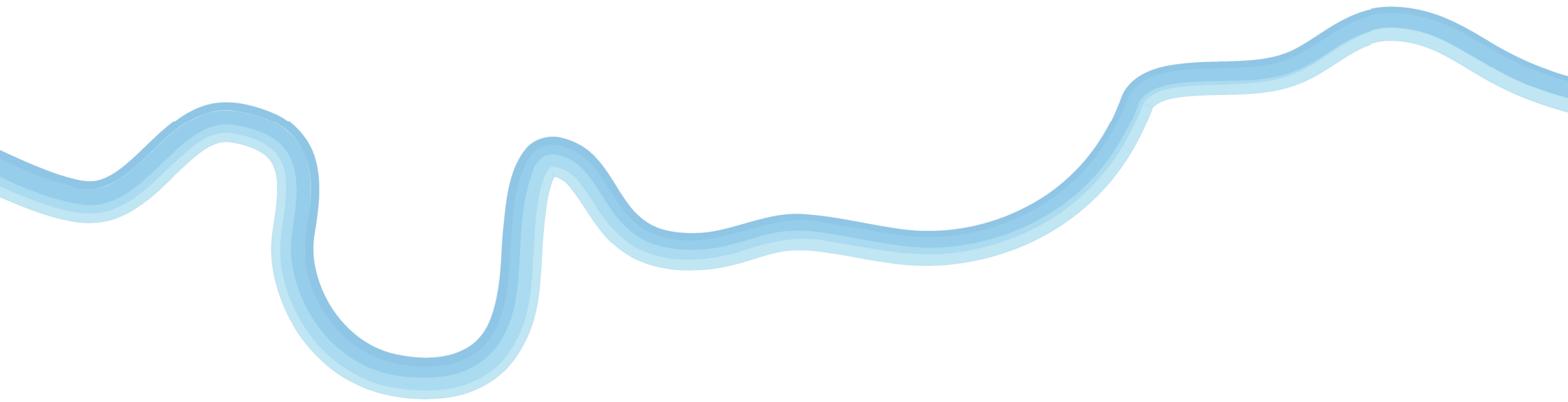
Table A2-1:
Assessment of Regeneration Objectives Against London Borough of Hammersmith and Fulham LDF Core Strategy Objectives

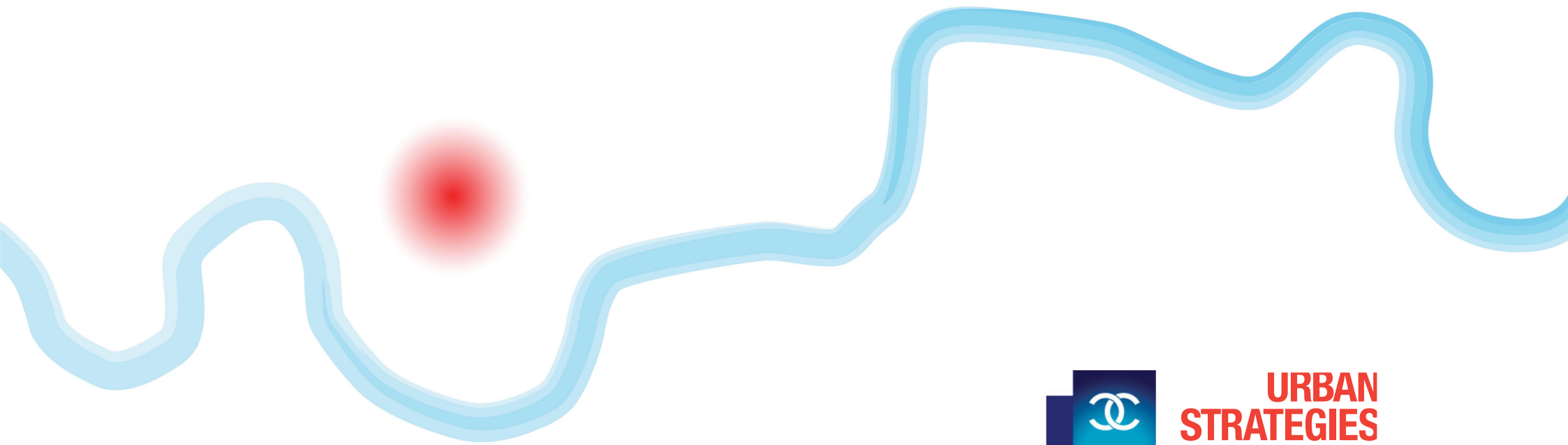
Regeneration Objective	LBHF Core Strategy Objective																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
1	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	0	✓
2	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓
3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	0	0	0	✓
4	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	0	0	0	✓
5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	0	✓	✓	✓
6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	0	✓	✓	D	0	✓	0	✓
7	✓	0	✓	?	✓	✓	✓	✓	✓	0	0	0	0	✓	✓	D	0	✓	0	✓
8	✓	0	✓	✓	✓	?	✓	?	✓	0	0	✓	✓	✓	✓	✓	0	✓	✓	✓
9	✓	✓	✓	?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓
10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	0	✓	0	✓
11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	0	✓	✓	✓

Table A2-2: Assessment of Regeneration Objectives Against Royal Borough of Kensington and Chelsea LDF Core Strategy Objectives

Regeneration Objective	RBKC Core Strategy Objective						
	1	2	3	4	5	6	7
1	√	√	√	√	√	√	√
2	√	√	0	0	√	√	√
3	√	√	√	0	0	√	0
4	√	√	0	0	0	√	0
5	√	√	√	√	√	√	0
6	√	√	√	√	√	√	√
7	0	√	√	0	0	0	0
8	0	0	√	√	√	0	√
9	√	√	√	√	√	√	√
10	√	√	√	√	√	√	√
11	√	√	√	√	√	√	√







**URBAN
STRATEGIES
INC .**

Capital & Counties on behalf of Earls Court and Olympia Group

EARLS COURT REGENERATION AREA
CORE STRATEGY EVIDENCE BASE
HOTEL LAND USE SUMMARY STUDY

JUNE 2009

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EARLS COURT REGENERATION AREA: HOTEL STUDY

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APPENDIX 1 – RBKC OPERATING HOTELS

EARLS COURT REGENERATION AREA: HOTEL STUDY

1 KEY POINT SUMMARY

- Earls Court Regeneration Area is an area that is earmarked as suitable, in principle, for hotel development.
- London hotel performance is historically very strong and is amongst the best performing hotel markets in Europe.
- London is one of the most profitable cities in the world for hoteliers, with one of the highest hotel values per room in Europe.
- The current dip in hotel performance is forecast to be relatively short term with recovery forecast at the end of 2010. The hotel developments at Earls Court Regeneration Area should be opening within a period of recovery within the market.
- Currently there are no significant hotel developments with planning permission in RBKC or LBHF, according to Hotel Data Bulletin.
- The GLA commissioned 2002 PWC report estimated an additional 36,000 additional hotel rooms would be required to meet demand in London between 2002 and 2016.
- The Grant Thornton follow up report in 2006 estimated an additional 50,000 rooms (gross) would be required to meet demand in London between 2006 and 2026.
- The Grant Thornton report indicated that 2,470 rooms (gross) would be required in the RBKC and the LBHF.
- The west of London lacks quality, internationally branded hotel stock.
- The development of Earls Court Regeneration Area represents a unique opportunity for hotel development. The site has good access to transport links and is situated close to many of the leisure and corporate focal points in London.
- The proposed hotel developments at Earls Court Regeneration Area will capitalise on the demand generated by both the new office, residential and conference components within the proposed scheme.
- The estimated 900 - 1,100 rooms at Earls Court Regeneration Area would begin to address the benchmark target for the provision of new hotel rooms highlighted in the GLA commissioned 'Hotel Demand Report 2006'.
- Approximately 45,000m² to 65,000m² would provide adequate hotel accommodation at Earls Court Regeneration Area.
- Further master planning and assessment will identify the exact scale, location and standard of the hotel developments.

2. INTRODUCTION

- 2.1. This study has been prepared for Capital & Counties on behalf of the Earls Court and Olympia Group as an evidence base for the Core Strategy submissions for the Earls Court Regeneration Area for the RBKC and LBHF Core Strategies.
- 2.2. The methodology employed for this study was mainly desk-based research. In order to complete the study the relevant planning policies of the respective councils were consulted to ensure the propriety of the proposed plans.
- 2.3. An assessment of current accommodation supply in RBKC was carried out and is detailed in the appendix to this report. Moreover, future accommodation capacity requirements have been based on reports commissioned by Greater London Authority and prepared by PricewaterhouseCoopers and Grant Thornton.
- 2.4. Hotel market performance reports from HVS and TRI were analysed to ascertain the strength of the overall London hotel market. An analysis of the existing and projected characteristics of demand markets, including estimates of growth, deemed to be relevant to this project were also analysed in light of the plans for the site.

EARLS COURT REGENERATION AREA: HOTEL STUDY

3. APPRECIATION OF RELEVANT PLANNING POLICIES

National Policies

- 3.1 Both Planning Policy Statement 6 and draft Planning Policy Statement 4 note that hotels and conference facilities are considered main town centre uses. Both national policy documents promote existing centres as appropriate locations for new development, thus contributing to overall sustainable development. It also notes that a high-density, mixed-use development that will reduce the need to travel is beneficial.

Regional Policies

- 3.2. Policy 3D.7 of the London Plan – Visitor accommodation and facilities - states that the Mayor will work with strategic partners to implement his Tourism Vision and to achieve 40,000 net additional hotel bedrooms by 2026.

Borough policies

Royal Borough of Kensington and Chelsea (RBKC) Unitary Development Plan (UDP)

- 3.3. RBKC has a general UDP policy:
- 1) To limit hotel development to acceptable locations within the Borough.
 - 2) To ensure that extensions to existing hotels in the Borough do not cause loss of residential accommodation or detriment to residential amenity.
 - 3) To limit the development of holiday let and time-share schemes to acceptable locations within the Borough.

Royal Borough of Kensington and Chelsea draft Core Strategy

- 3.4. The RBKC draft Core Strategy and North Kensington Plan “Towards Preferred Options” document states that existing hotels should be protected and enhanced up to 2012. In addition, it states that the encouragement of new hotels as part of mixed use developments in highly accessible areas such as Knightsbridge, South Kensington, Notting Hill Gate and The Earls Court exhibition site is considered appropriate

London Borough of Hammersmith and Fulham (LBHF) UDP

- 3.5. LBHF’s UDP sets out that hotels will be permitted where:
- 1) The site is in a town centre or, in terms of its scale and location is well related to public transport and tourist facilities.
 - 2) The site or building is not within or close to a residential area.
 - 3) Where the site has been in employment use, there is no demonstrable need for the site or building for class B uses.

London Borough of Hammersmith and Fulham draft Core Strategy

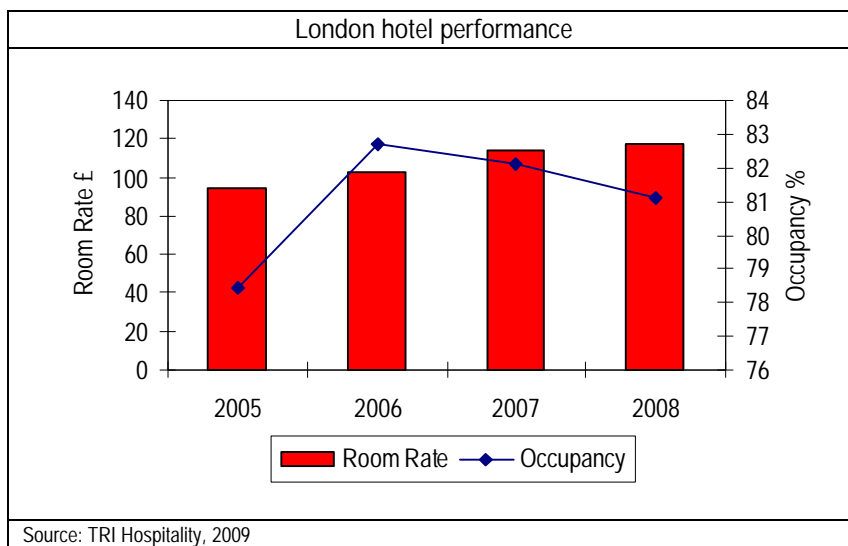
- 3.6. The Core Strategy Preferred Options states that an International Convention Centre for London could be developed as part of a scheme including the development/redevelopment of the Earls Court and Olympia complexes; the Earls Court Regeneration Area could also be a new location for hotels.

4. LONDON HOTEL DEMAND AND SUPPLY

Hotel market recent trends and performance

Performance

4.1. Hotel performance in London has been showing improvements since the 2005 July bombings. Occupancy rates have been historically high in recent years, at above 80%. Average Daily Rate (ADR) has been growing steadily year on year to a high of £117 in 2008. This is illustrated on the following graph.



4.2. The economic recession may lead to 2009 being a tougher year but there are signs of resilience and indeed some improvement in performance terms in the first part of 2009.

Seasonality

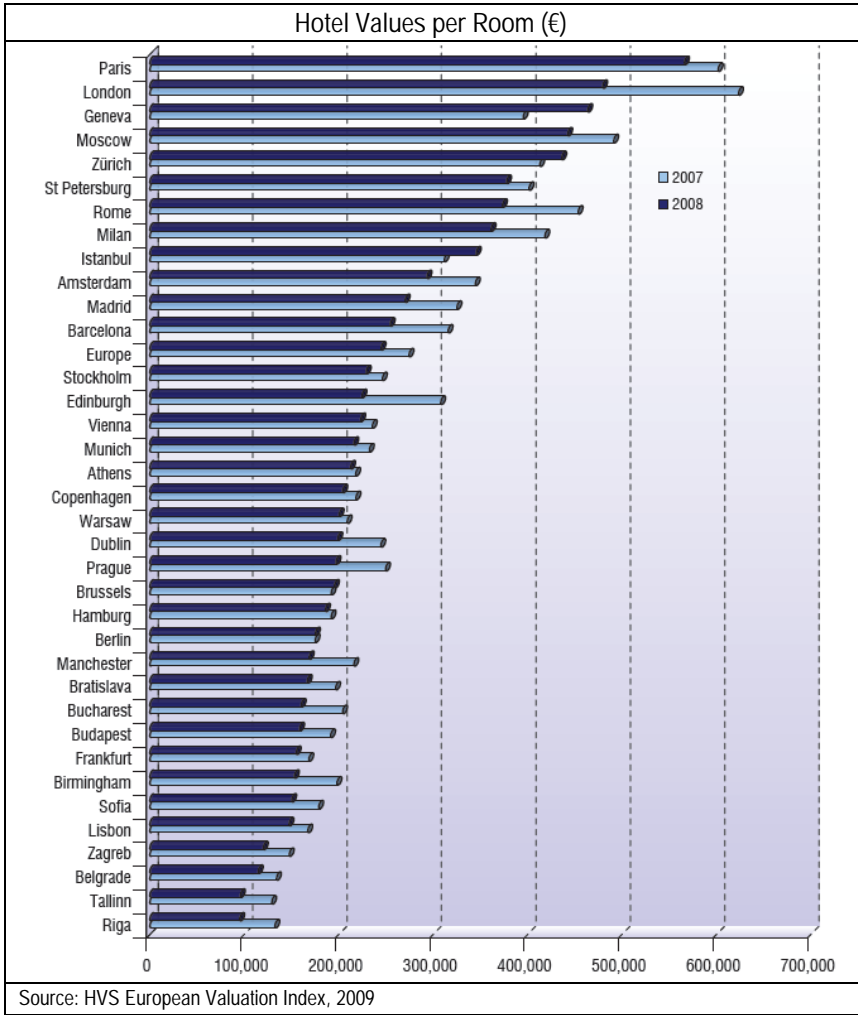
4.3. Weekday vs Weekend Demand - London hotel demand is driven by both the corporate and the leisure sectors. Weekday demand is highest, particularly on Wednesdays with occupancy levels in excess of 90%. This reflects strong corporate and conference demand. Hotels have the lowest occupancy levels on Sundays, ranging from 55% to 65%.

4.4. Monthly Demand - Demand at London hotels is relatively consistent throughout the year with the lowest occupancy levels recorded during the months of December and January. The busiest months tend to be September, October and November driven by conferences and events.

Values

- Historically London has been one of the most profitable cities in the world for hoteliers, with the highest hotel values per room in Europe.
- In 2008 Paris displaced London from the first rank, as illustrated in the graph on the following page. It is thought, however, that the main reason for Paris overtaking London is rooted in the fact that Paris historically lags London in terms of being impacted by an economic downturn.

EARLS COURT REGENERATION AREA: HOTEL STUDY



- London hotels had a mixed year in 2008, experiencing a strong start to the year and a decline in occupancy and rate in the second half of the year.

EARLS COURT REGENERATION AREA: HOTEL STUDY

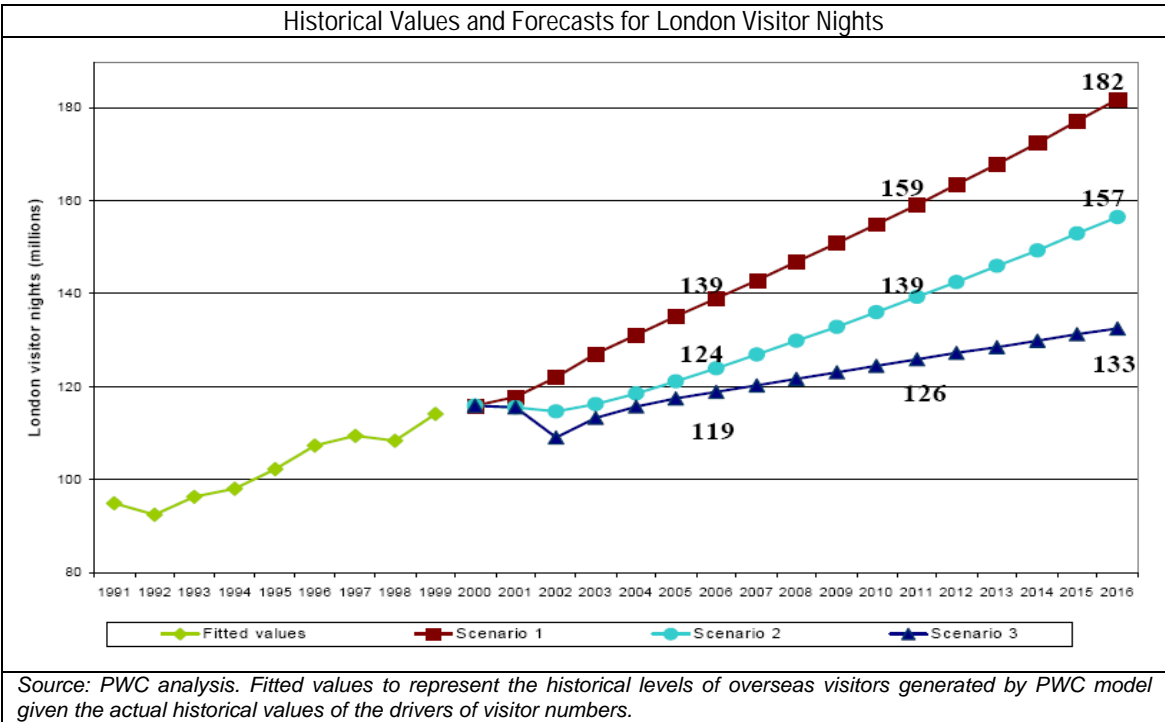
Review of GLA commissioned hotel studies - London

- 4.5. Since 2000 there have been two significant reports commissioned to assess the demand and capacity for hotels in London. The first, in 2002, was commissioned by the GLA and produced by PWC. The second report reassesses the benchmark figures produced in the 2002 report. It was also commissioned by the GLA and was produced by Grant Thornton.
- 4.6. This section briefly reviews both reports and comments on what potential changes may occur given the recent economic downturn.

Demand and capacity for hotels and conference centres in London – By PWC (2002)

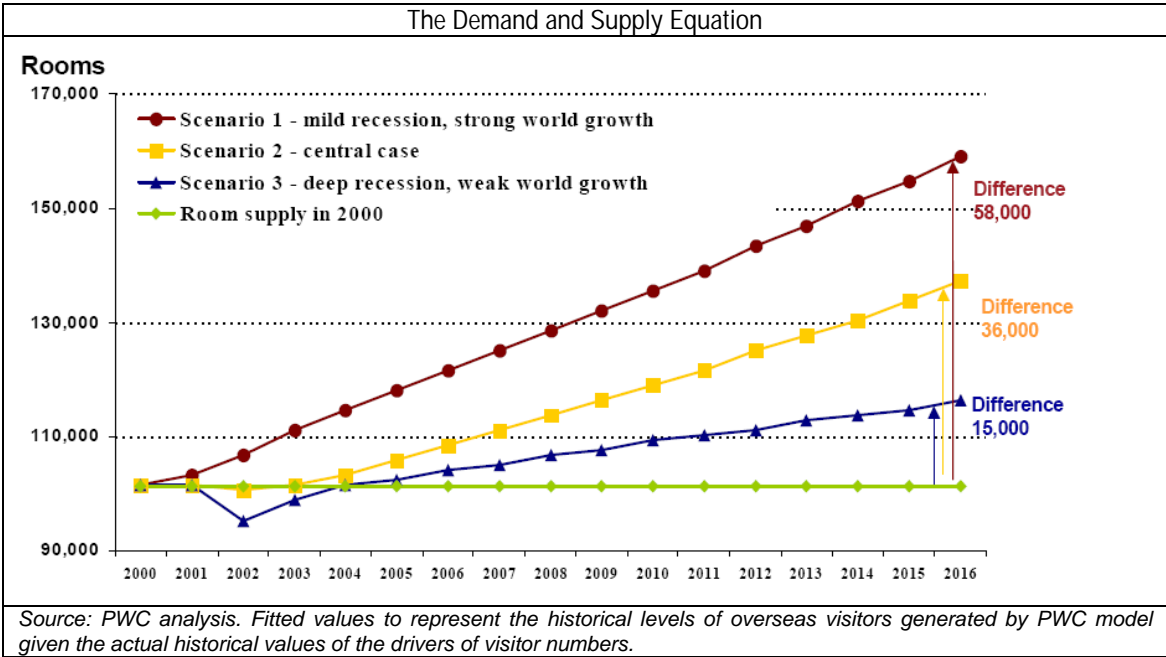
- 4.7. The purpose of this report was ‘to forecast future demand for hotels in London in order to facilitate tourism and wider economy growth, and in a way which also complements the wider policy agenda of sustainable growth’.
- 4.8. The methodology looks to forecast growth in demand based on historic data, to then forecast the capacity needed to meet that demand.
- 4.9. Three scenarios were used in forecasting London visitor nights.
 - Scenario one assumes optimistic assumptions including a very mild slowdown in the world economy.
 - Scenario two (the main scenario) assumes a mild recession with subsequent strong growth averaging 2.5% per annum.
 - Scenario three uses much more pessimistic assumptions. This scenario assumes a deeper recession coupled with slower long term growth.

4.10. The graph below illustrates the resulting forecasts for London visitor nights.



EARLS COURT REGENERATION AREA: HOTEL STUDY

- 4.11. To assess future needs PWC assessed the difference between room stock in existence at the end of 2000 and future forecast demand. The estimated room stock in 2000 was 101,269 hotel rooms in London.
- 4.12. Using a funnelling process the forecasted annual visitor nights were converted into visitor nights staying in hotels on a nightly basis. This was then adjusted for room occupancy to give the number of rooms required to accommodate demand to 2016.
- 4.13. The results of this demand and supply equation are illustrated in the graph below.



- 4.14. The results indicate that by 2016 between 15,000 and 58,000 new rooms could be needed to match future tourism demand.
- 4.15. The main scenario within this study suggests an extra 36,000 rooms are needed in London over the 2001-2016 period. This is equivalent to 2,400 new rooms per annum.
- 4.16. Taking into account the current economic downturn and projected recovery we would expect the actual number required to be somewhere between 15,000 and 36,000, still showing an overall significant increase to 2016.

Hotel demand study – Grant Thornton (2006)

- 4.17. A key policy tool for the London Plan is the benchmark target for the provision of new hotel bedrooms supply. It was decided during the revision of the London Plan to revisit the benchmark report produced by PWC in 2002.
- 4.18. The Grant Thornton hotel demand study updates the PWC benchmark and examines the future hotel needs of London up to 2026. Within this section we review the elements of this report that are relevant to potential hotel developments in Earls Court Regeneration Area.
 - Grant Thornton concludes that an extra 2,000 rooms (net) are required per annum over the period to 2026. This is an increase of approximately 40,000 rooms (net).

EARLS COURT REGENERATION AREA: HOTEL STUDY

- In order to meet this target an additional 2,500 (gross) hotel rooms will be needed due to a potential loss of 500 rooms per year.
- As higher growth was expected in the first decade, this implies that an estimated 2,800 gross new rooms would be required each year between 2007-2016.
- The reason for this increase from the PWC report is that the loss of hotel rooms had not been taken into account in previous reports.

	Estimates of rooms 'required'	
	Gross new rooms required	Net extra rooms required
2007-2016	2,800	2,300
2016-2026	2,200	1,700
2007-2026	2,500	2,000

Source: Grant Thornton Hotel Demand Study 2006

- The actual loss of hotel stock in London is illustrated in the table below.

Year	GLA Database
1995	195
1996	54
1997	86
1998	65
1999	230
2000	111
2001	237
2002	379
2003	109
2004	1007
2005	476
5 Year Average	442
10 Year Average	275

Source: GLA Database

- 4.19. Given the current economic downturn it is expected the loss of hotel stock to be above average in 2008, 2009 and 2010.

London Future Hotel Supply

- 4.20. Despite the recession, there is still likely to be a significant medium and long term need for a strong supply of London hotel rooms.
- 4.21. There are currently no hotel projects with planning permission in RBKC or LBHF according to the Hotel Data Bulletin.

EARLS COURT REGENERATION AREA: HOTEL STUDY

5. ROYAL BOROUGH OF KENSINGTON & CHELSEA AND LONDON BOROUGH OF HAMMERSMITH & FULHAM

Review of GLA study data for Boroughs

- 5.1. Within the GLA commissioned reports detailed in the previous section, the Boroughs of London were examined in more detail. This section reviews the information relevant to the Royal Borough of Kensington & Chelsea and the London Borough of Hammersmith & Fulham.

Review of PWC (2002) data set for Boroughs

- 5.2. Within the PwC 2002 report a questionnaire and workshop were drawn up to understand the views of the individual boroughs in terms of future hotel requirement. This involved a questionnaire with specific questions on tourism, hotels, planning and conference facilities. For the purposes of this overview any issues raised by the RBKC and the LBHF have been highlighted.

- The LBHF listed the following events which may encourage tourism.
 - Development of local business – BBC media
 - Development of evening business/economy
 - Regeneration of neighbouring boroughs – Hounslow, Terminal 5
- The RBKC noted some tension between local residents and hotels.

Review of Grant Thornton (2006) data set for Boroughs

- 5.3. The Grant Thornton study in 2006 examines the hotel stock in each Borough of London and then estimates the additional rooms requires in each Borough to meet future demand.
- 5.4. The table below illustrates the historic hotel stock by sub region.

	Estimated Stock 2005	% Total of Supply
NORTH		
Total	56,506	56.4
NORTHEAST		
Total	8,289	8.3
SOUTH EAST		
Total	3,446	3.4
SOUTH WEST		
Total	5,346	5.3
NORTH WEST		
Brent	747	0.7
Ealing	1,444	1.4
Hammersmith & Fulham	3,467	3.5
Harrow	507	0.5
Hillingdon	7,358	7.3
Hounslow	968	1.0
Kensington & Chelsea	12,043	12.0
Total	26,534	26.5
TOTAL	100,122	100.0

Source: Grant Thornton Hotel Demand Study 2006

EARLS COURT REGENERATION AREA: HOTEL STUDY

- In 2005 the RBKC and RBHF accounted for 15.5% of the hotel stock in London, approximately 16,000 rooms.
- The table below illustrates the indicative estimate of approximate hotel rooms required between 2007 and 2026.

	Approximate figures 2007 - 2026		
	Gross new rooms required	Possible loss of rooms	Net extra rooms required
NORTH			
Total	13,575	4,325	9,250
NORTHEAST			
Total	7,375	1,125	6,250
SOUTH EAST			
Total	6,150	650	5,500
SOUTH WEST			
Total	9,550	1,050	8,500
NORTH WEST			
Brent	2,900	400	2,500
Ealing	1,200	200	1,000
Hammersmith & Fulham	1,350	350	1,000
Harrow	650	150	500
Hillingdon	3,800	800	3,000
Hounslow	2,200	200	2,000
Kensington & Chelsea	1,120	750	500
Total	13,350	2,850	10,500
TOTAL	50,000	10,000	40,000

Source: Grant Thornton Hotel Demand Study 2006

- The Grant Thornton report estimates the RBKC and RBHF will require an additional 2,470 rooms (gross) between 2007 and 2026 to address demand and the potential loss of 1,100 rooms.

Current Hotel Provision (RBKC and LBHF)

- 5.5. This section gives an overview of the hotels currently operating in the RBKC and LBHF. For the purposes of this overview, only hotel supply has been reviewed, Bed and Breakfast operations and Guesthouses have not been included. For this overview the hotels are split into 3 categories, upmarket, midmarket and budget.
- 5.6. Upmarket = 4* Deluxe – 5 Star
- 5.7. Midmarket = 3 Star – 4 Star
- 5.8. Budget = Anything below 3 Star

Royal Borough of Kensington and Chelsea

- 5.9. As mentioned above the Borough of Kensington and Chelsea accounts for approximately 12% of the hotel room stock in London. See appendix 1 for a full list of all hotels operating in the RBKC as listed by the council in 2009.

EARLS COURT REGENERATION AREA: HOTEL STUDY

London Borough of Hammersmith and Fulham

- 5.10. The LBHF accounts for approximately 3.5% of the London hotel stock. The following table lists all the hotels operating in the Borough as listed by the council in 2009.

Hammersmith		
Hotel	Rooms	Quality
Premier Inn Hammersmith	120	Budget
Express By Holiday Inn Hammersmith	135	Budget
Novotel London West	629	Midmarket
Total	884	
Fulham		
Hotel	Rooms	Quality
Avonmore Hotel	2	Budget
Express By Holiday Inn earls Court	100	Budget
Hotel Lily Kensington	110	Budget
Premier Inn Putney Bridge	154	Budget
Hotel Ibis Earls Court	504	Budget
La Reserve Hotel	43	Midmarket
Jurys Inn Chelsea	172	Midmarket
Millennium & Cophorne Hotel Chelsea	291	Midmarket
Wyndham Grand London Chelsea Harbour	160	Upmarket
Total	1,536	
Sheperds Bush		
Hotel	Rooms	Quality
K West Hotel and Spa	222	Upmarket
Hilton Kensington	603	Upmarket
Total	825	
RBHF TOTAL	3,245	

- 5.11. A significant percentage of the hotel stock in both these Boroughs is small, privately operated and unbranded. Any new, branded operation is expected to outperform current hotel stock. This performance will largely be due to the strength of the hotel operators reservations system and marketing power.

EARLS COURT REGENERATION AREA: HOTEL STUDY

6. DEMAND AND CAPACITY DRIVERS FOR HOTELS AT EARLS COURT REGENERATION AREA

6.1. Given the mix of indicative land use within the regeneration plans for Earls Court Regeneration Area, there will be further demand for hotel accommodation. This section outlines the demand drivers created by the components within the development as well as the wider London market.

Corporate Demand

6.2. The corporate market is the principal market for generating accommodation demand during the week in London. Both RBKC and LBHF have significant amount of office space and therefore a large number of companies are based in the area.

6.3. The proposed office development component at Earls Court Regeneration Area will increase corporate demand. HVS carried out a study in 2008 that attempted to quantify the correlation between office space and hotel demand. Applying the same principles, the following roomnights could be generated by the proposed 4 million to 6 million square feet of office development:

235 ft ² of occupied office = 14 roomnights
1,000 ft ² of occupied office = 60 roomnights
4m ft² of occupied office space = 240,000 roomnights
6m ft² of occupied office space = 360,000 roomnights

6.4. Using this calculation and assuming 200 weekdays in a year (corporate demand Monday – Thursday), approximately 900 to 1,800 rooms would, in accordance with such calculations, be required to meet corporate demand. Given the existing hotel provision in London this estimate is deemed high.

Conference and meeting demand

6.5. Any mid-market or upmarket hotel operation at Earls Court Regeneration Area is envisaged to have conference and meeting facilities. The demand for conferencing and meetings would be driven by businesses based in the area. It is also envisaged there would be demand from individuals and corporations attending events at Olympia.

6.6. The Earls Court and Olympia complexes have been identified as potential locations for a convention centre in the LBHF draft Preferred Options. A convention centre would host a number of large events throughout the year. This would generate a considerable amount of additional demand for hotels in the local area.

Leisure Demand

6.7. London is a major tourist attraction with leisure tourists visiting all year round. The city's landmark buildings are spread across London with a number located close to Earls Court Regeneration Area. A majority of the city's leisure tourism is concentrated to the west of London. With this in mind, hotels at Earls Court Regeneration Area are well placed to capture a share of leisure demand.

EARLS COURT REGENERATION AREA: HOTEL STUDY

- 6.8. Leisure demand will be generated by a number of markets including:
- Leisure visitors to London who want to be in close proximity to sights in West London.
 - Individuals attending events held in West London.
 - Individuals attending events at Olympia.
 - Group tours.
- 6.9. Leisure development on the Earls Court Regeneration Area may create further selling points for hotels.

Function Demand

- 6.10. Earls Court Regeneration Area is located close to a number of large residential areas, many of which are affluent. It is envisaged there would be demand for hotel function space to host a number of different events. These could include:
- Weddings.
 - Birthday Celebrations.
 - Charity Events.
 - Religious Celebrations.
- 6.11. The new homes developed at Earls Court will further increase the demand for functions and events.

Visiting Friends and relatives

- 6.12. The new residential development at Earls Court Regeneration Area will increase demand for hotel accommodation from people visiting friends and relatives.

Transport

- 6.13. Earls Court Regeneration Area benefits from good transport links. These links allow individuals to access international airports, the national rail network, the local rail network and local public transport. Easy access to transport links is a major factor for individuals booking hotel accommodation.
- 6.14. The points below detail the available transport links in more detail.
- 1) Earls Court Regeneration Area is located to the west of central London, in close proximity to the A4 and M4 motorway. This allows guests to get to and from Heathrow airport in approximately 40 minutes, avoiding much of the traffic in central London.
 - 2) Access to local transport links. There are several tube stops close to Earls Court Regeneration Area, these are detailed below:
 - Earls Court Underground Station – is serviced by both the District and Piccadilly line. The Piccadilly line will allow guests to be in central London and the West End in approximately 12 minutes. The Piccadilly line also runs directly to Heathrow airport.

EARLS COURT REGENERATION AREA: HOTEL STUDY

- West Brompton and West Kensington Underground Stations – are serviced by the District Line, this runs east towards Cannon Street, west towards Richmond and Ealing, and south towards Wimbledon.
 - Gloucester Road Underground Station – is serviced by the Circle line, District line and Piccadilly line. The Circle line runs clockwise towards Paddington and Euston and anti-clockwise towards Victoria and Liverpool Street.
- 6.15. Improvements in capacity on the network are proposed through the introduction of new trains and increased frequencies. This is part of the LUL PPP programme. The opening of Crossrail will further improve public transport in London.
- 6.16. West Brompton is also on the London Overground line which runs to a number of stops in north London including Willesden junction (9 minutes) before turning east towards Stratford. Importantly it also runs south to Clapham Junction (10 minutes) for connections including Gatwick Airport. This line has considerable scope for increased train frequencies.

Conclusions

- 6.17. Based on the demand and capacity drivers it is estimated that approximately 45,000m² - 65,000m² (gross external area) would provide adequate hotel accommodation at Earls Court Regeneration Area. This is based on approximately 900 – 1,300 rooms at 50m² gross area per room. The 50m² is an average, foreseeing a mix of hotel types within Earls Court Regeneration Area, potentially ranging from budget to upmarket. The actual amount would depend on all the other proposed components being developed and occupied. Further master planning will be needed to identify the exact scale, location and standard of the hotel developments.

Appendix 1

RBKC OPERATING HOTELS

Hotel	Number of Rooms	Standard
Kensington Manor Hotel	12	Budget
Monopole Hotel	12	Budget
Normandie Hotel	14	Budget
Chelsea Lodge Hotel	15	Budget
Vicarage Private Hotel	17	Budget
Clearlake Hotel	20	Budget
Oxford Hotel	21	Budget
Beverley City Hotel	23	Budget
Hotel Olympia	25	Budget
London Town Hotel	30	Budget
Castleton Hotel	37	Budget
Beaver Hotel	38	Budget
Belgrave Hotel	40	Budget
Grand Tourist Hotel	40	Budget
Reem Hotel	40	Budget
Leisure Inn Hotel	45	Budget
London Visitors Hotel	45	Budget
Dolphin Hotel	47	Budget
Easy Hotel	50	Budget
Kensington International Inn	56	Budget
Rasool Hotel	57	Budget
Cromwell Crown Hotel	60	Budget
Shakespeare Hotel	60	Budget
Eden Plaza Hotel	62	Budget
Garden View Hotel	62	Budget
Mitre House Hotel	67	Budget
Mowbray Court Hotel	75	Budget
Commodore Hotel	83	Budget
Cranley Gardens Hotel	85	Budget
The Hogarth London	85	Budget
Norfolk Plaza Hotel	87	Budget
Express by Holiday Inn Earls Court	100	Budget
Kensington Moat House	107	Budget
Quality Hotel Westminster	107	Budget
Park International Hotel	117	Budget
Comfort Inn Kensington	125	Budget
London Kensington Premier Inn	184	Budget
Ibis London Earls Court	504	Budget
Total Budget	2,654	

Hotel	Number of Rooms	Standard
Twenty Nervern Square Hotel	20	Midmarket
Portobello Hotel	24	Midmarket
Holland Court	25	Midmarket
Henley House Hotel	26	Midmarket
London Lodge Hotel	28	Midmarket
The Gallery	34	Midmarket
Draycott Hotel	35	Midmarket
Kensington Court Hotel	35	Midmarket
Ashburn Hotel	38	Midmarket
John Howard Hotel	40	Midmarket
Duke of Leinster Hotel	42	Midmarket
The Gainsborough	48	Midmarket
Hotel Oliver	50	Midmarket
Elysee Hotel	54	Midmarket
Montana Hotel	55	Midmarket
The Parkcity Hotel	62	Midmarket
Base2stay	67	Midmarket
Rydges Kensington Hotel	89	Midmarket
Kensington Rooms Hotel	97	Midmarket
Enterprise Hotel	100	Midmarket
Burns Hotel	104	Midmarket
Shaftesbury Kensington Hotel	133	Midmarket
Abmbassadors Hotel	140	Midmarket
Caesar Hotel	140	Midmarket
The Kensington Hotel	150	Midmarket
K + K Hotel George	154	Midmarket
Jurys Inn Chelsea	172	Midmarket
Park Inn Hyde Park	188	Midmarket
Regency Hotel	210	Midmarket
Ramada Jarvis Bayswater	213	Midmarket
Jolly Hotel St Ermin's	275	Midmarket
Crown Plaza London St James	342	Midmarket
Royal Lancaster	416	Midmarket
Kensington Close Hotel	550	Midmarket
Cophorne Tara Hotel	833	Midmarket
Holiday Inn London Kensington	906	Midmarket
Total Midmarket	5,895	

Hotel	Number of Rooms	Standard
Durley House Hotel	11	Upmarket
San Domenico House Hotel	15	Upmarket
The 54 Boutique Hotel	26	Upmarket
Egerton Hotel	28	Upmarket
The Knightsbridge Green Hotel	28	Upmarket
Beaufort Hotel	29	Upmarket
Guesthouse West	30	Upmarket
Parkes Hotel	33	Upmarket
Cranley Hotel	39	Upmarket
Rockwell Hotel	40	Upmarket
Blakes Hotel	41	Upmarket
Number Sixteen	42	Upmarket
Knightsbridge Hotel	44	Upmarket
Myhotel Chelsea	45	Upmarket
Mayflower Hotel	48	Upmarket
Captial Hotel	49	Upmarket
Pelham Hotel	52	Upmarket
Milestone Hotel and Apartments	57	Upmarket
Eleven Cadogan Gardens	60	Upmarket
Bentley Hotel	64	Upmarket
Cadogan Hotel	65	Upmarket
Grange Strathmore Hotel	77	Upmarket
Grange Rochester Hotel	80	Upmarket
Abba Queensgate Hotel	82	Upmarket
Sheraton Belgravia	89	Upmarket
Rembrandt Hotel	194	Upmarket
NH Harrington Hall Hotel	200	Upmarket
Millennium Bailey's Hotel	212	Upmarket
Radisson Edwardian Vanderbilt Hotel	215	Upmarket
London Marriott Kensington	216	Upmarket
Jumeirah Carlton Tower	220	Upmarket
K West Hotel and Spa	222	Upmarket
Millennium Hotel Knightsbridge	222	Upmarket
Sheraton Park Tower	280	Upmarket
Royal Garden Hotel	396	Upmarket
Hilton London Olympia	405	Upmarket
Millennium Gloucester London	610	Upmarket
Total Upmarket	4,566	
RBKC TOTAL	13,115	

Capital & Counties on behalf of the Earls Court and Olympia Group

EARLS COURT REGENERATION AREA
CORE STRATEGY EVIDENCE BASE
OFFICE LAND USE SUMMARY STUDY

JUNE 2009

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EARLS COURT REGENERATION AREA: OFFICE STUDY

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1 INTRODUCTION

- 1.1 This report has been prepared for Capital & Counties on behalf of Earls Court and Olympia Group as an evidence base for the Core Strategy submissions for the Earls Court Regeneration Area for the RBKC and LBHF Core Strategies. The analysis reviews existing planning literature and the latest office employment forecasts to give indicative floorspace estimates. The results are then set in the context of office market developments across London, notably the emergence of new Urban Quarters since the 1990s.

2 KEY POINT SUMMARY

- 2.1. West London has the capacity to provide an extra 13,000-40,000 office jobs over the next two decades – this would require an additional office floorspace of between 230,000m² and 600,000m² (2.5-6.5 m ft²) over the period. London wide the capacity required is 2.9m².
- 2.2. This demand provides an opportunity to create a new business district or Urban Quarter at the Earls Court Regeneration Area, exploiting excellent public transport access and with a substantial enough office element to attract major corporate occupiers and highly-skilled workers from across London and the South East.
- 2.3. A total office stock of around 400,000 to 550,000m² (4-6 m ft²) would be needed for this new business destination given the potential demand and competing supply. This would be similar to established UQ schemes at Broadgate and Kings Cross. As well as making this mixed use regeneration proposal successful, it would complement existing office locations in West London.
- 2.4. A new West London Urban Quarter, together with Paddington 120,000-190,000m² (1.3 – 2 m ft²) and Hammersmith with 780,000 m² (8.4 m ft²), could eventually total between 1.2m m² to 1.5m m² (13.7m -16.4m ft²) to be built from 2015 to 2026 and beyond. This will redress the balance between West and East London. The central Canary Wharf scheme now totals over 16m ft² (excluding surrounding office schemes).
- 2.5. The lack of large floorplate offices in the West End of London (many lettings are below 5,000 m²/50,000 ft²) has already created demand for space at Paddington. This and the leasing of the Empress State building 33,900m² (364,900 ft²) - to the Metropolitan Police in 2004 demonstrates a market demand for larger buildings.
- 2.6. Typically, prime West End office rents (which are the highest in the world) are more than twice the rental levels in Hammersmith, Paddington and Docklands (Canary Wharf) which demonstrates a high level of demand relative to the current restricted supply of modern office space in the West End.

3 REVIEW OF PLANNING POLICY DOCUMENTS

National Policy

- 3.1 Planning Policy Statement 1 aims to focus developments that attract a large number of people, including office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development. Draft Planning Policy Statement 4 follows a similar vein stating that where appropriate, in urban areas, high density development should be encouraged within existing centres accessible by public transport, walking and cycling.

London Policy

- 3.2. The **London Plan** (LP) is the RSS for the capital. It provides broad policy guidelines on the future office development in London, notably in section 3B.2 on supporting supply and 3B.3 encouraging mixed-use development in the Central Activities Zone (CAZ) and Docklands. These office policies mirror national planning priorities.
- 3.3. The GLA have also commissioned regular **London Office Policy Reviews** (LOPR) giving an independent, market-based assessment to guide planning. The latest of these was undertaken by Ramidus Consulting and Roger Tym & Partners in May 2007 and used to inform the subsequent Examination in Public for alterations to the LP¹. Although the recession may have altered short term conditions since publication, the emphasis of the report was the five long-term (that is, the next 15 or more years) strategic planning benchmarks.
- 3.4. The report also used detailed employment-based forecasts of office capacity. These are based on around 600,000 office jobs created by 2026 (using the Volterra/GLA estimates), with about half of these in the Central Activities Zone (CAZ) which includes the eastern edge of RBKC and Canary Wharf.
- 3.5. Between 2006 and 2026, LOPR scenarios indicate an additional need of 7.0-10.6 million m² of offices region-wide, based on various density and job assumptions. In 2006, London potential supply was estimated at 5.6 million m², indicating the potential for excess demand, but not severe enough to constrain office job creation according to the report.
- 3.6. In the LOPR preferred scenario, the local need is given as 250,000-270,000m² in LBHF and 107,000-118,000m² in RBKC, a total of around 375,000m². Supply for each is calculated from space under construction and permissions at 106,466m² (LBHF) and 53,233m² (RBKC) a total of 160,000m², which is a relatively large shortfall against demand compared with other London boroughs.

RBKC and LBHF

- 3.7. In response to the LP, each borough is preparing a **Local Development Framework** (LDF) a folder of documents to guide planning into the 2020s. Both RBKC and LBHF began work on Core Strategies in 2005, consulting on the various options to identify strategic objectives and key sites. The next stage is submission to the Secretary of State, with the aim to deliver all elements of the LDF by 2011.

¹ <http://www.london.gov.uk/mayor/planning/docs/lopr-07.pdf>

RBKC Towards Preferred Options 2008

- 3.8. In RBKC, the latest document, Towards Preferred Options² was published in November 2008 and gives preferred options for a proposed Core Strategy and the North Kensington Plan. In terms of strategic sites with office implications considered in the Core Strategy, these are identified as:
- Earls Court – an office-led, mixed-used development with conference centre
 - Kensington High Street – a location for small offices
 - Knightsbridge – a mixed-use provision with offices above retail
 - Possible alternative development for Notting Hill Gate with retail and offices
- 3.9. There is consideration of general business space needs in RBKC (section 5.2), drawing heavily on the **RBKC's Employment Land Use Study**, prepared by Roger Tym & Partners in January 2007
- 3.10. This detailed study found an under-supply of B1 space of 21,809m² (with planned supply of 92,455m² and demand forecast at 114,264m²) based on GLA forecasts of 6,348 new office jobs between 2001 and 2021. This figure is small, at about 4% of stock, but represents a minimum estimate, assuming market balance at the start and no depreciation in existing B1 stock over time.
- 3.11. The key messages and indicative policies from the preferred options Core Strategy are:
- RBKC has an undersupply of office space reflected in high rents
 - There is scope to increase supply over and above current plans
 - Additional space losses will worsen the situation and must be avoided

LBHF Core Strategy Options 2009

- 3.12. The revised Preferred Options Core Strategy document is currently being publicly consulted on. Preferred Option B1 states that Hammersmith Town Centre should be the preferred office location in LBHF and that major office based development should be encouraged in Hammersmith Town Centre and in the White City Opportunity Area as part of a mixed use approach. The policy also states that an International Convention Centre for London should be developed as part of a scheme including developing or re-developing of the Earls Court and Olympia complexes and the Earls Court Regeneration Area and could also be a new location for office development and hotels.
- 3.13. A land use study for LBHF was produced by Atkins in October 2005 to support the LDF³. On the basis of 18,700 extra B class-use jobs created in the period 2001-16, they project office space needs at between 200,000-280,000m².
- 3.14. Current existing supply (all B uses) was identified at 286,000m², suggesting a potential shortfall, if demand is in the upper range or some of the potential space was not used for offices. Moreover, the report questions the quality of some existing sites and indicates a failure to provide modern office space could constrain economic development.

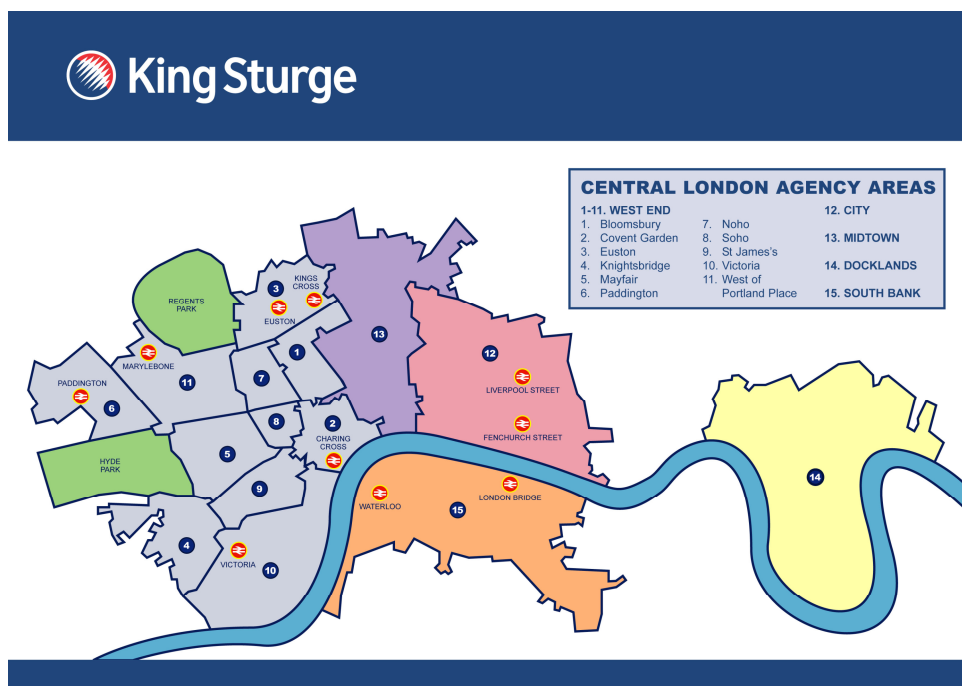
² http://www.rbkc.gov.uk/Planning/general/ldf_corestrategy_nkplan.pdf, also <http://www.rbkc.gov.uk/Planning/localdevelopmentframework/default.asp> and <http://www.rbkc.gov.uk/Planning/general/>

³ http://www.lbhf.gov.uk/Images/LBHF%20Final%20Rept_MAINBODY_tcm21-49937.pdf

4 LONDON OFFICE MARKETS

- 4.1 Dedicated researchers in King Sturge's City and West End teams hold a comprehensive dataset on all aspects of Central London's office markets. These figures are sourced from various areas, including agents, contacts and data providers such as Focus and EGi. The results are then verified by the commercial office teams and cross-checked with other sources, before being published in quarterly bulletins.
- 4.2. Central London market coverage is outlined below. The core markets are broadly similar in size, but cover a very different geographical footprint. The compact City in the east contrasts with the more sprawling West End, which runs from Kings Cross in the North to Victoria in the South and reaches Paddington and Knightsbridge on its western boundary.
- 4.3. Because the City and Docklands form London's global financial centre, it is also common to group these and contrast with the more diverse occupier markets in the west. In this analysis, the West Central London (WCL) area is defined as West End plus the fringe markets of Midtown and South Bank. This western segment is an appropriate benchmark for LBHF and RBKC being both closest and more similar in occupier mix to the existing office centres than the eastern financial districts.

Map 1 King Sturge Central London markets

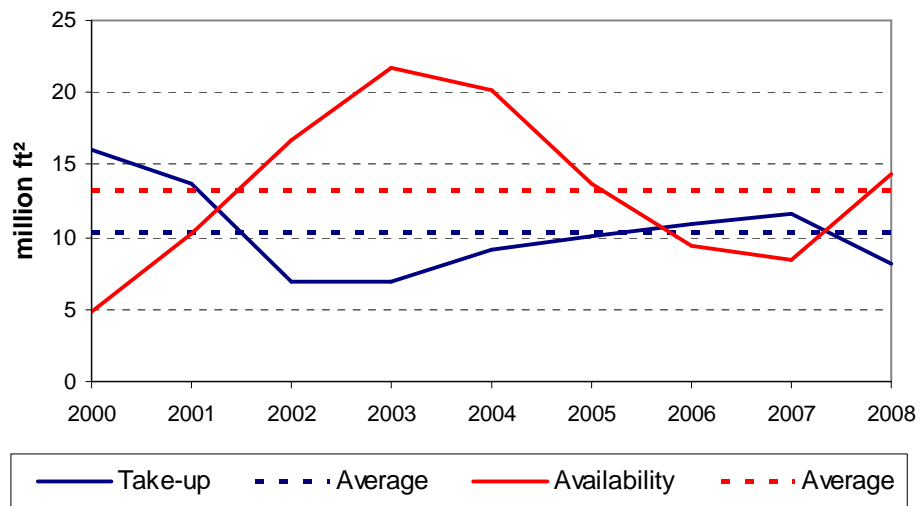


- 4.4. Office market conditions in Central London have changed significantly since mid-2007. Take-up in Central London⁴ outstripped availability from 2005 to 2007, driving strong rental growth until early 2008. In 2008, the position reversed to one of excess supply and indications are that the supply-demand imbalance rose further in early 2009.

⁴ Comprises the office markets of the West End, City, Midtown, South Bank and Canary Wharf

- 4.5. By end-2008, total availability rose to 14.4m ft², exceeding the long-run annual trend (of 13.3m ft²). The West End and City of London accounted for 78% of this space, with the rest in the fringe locations (Midtown, South Bank and Canary Wharf).
- 4.6. In WCL as a whole (WCL defined as the sum of West End, Midtown and South Bank markets) accounted for 45% of availability (or 6.4m ft²) at end-2008, a slightly lower proportion than in 2007. Of this, 4.5 million ft² was in the West End, with 1.6m ft² in Midtown and 0.4m ft² in South Bank. From 2000 to 2008, availability in the WCL market averaged 6.0m ft² a year.

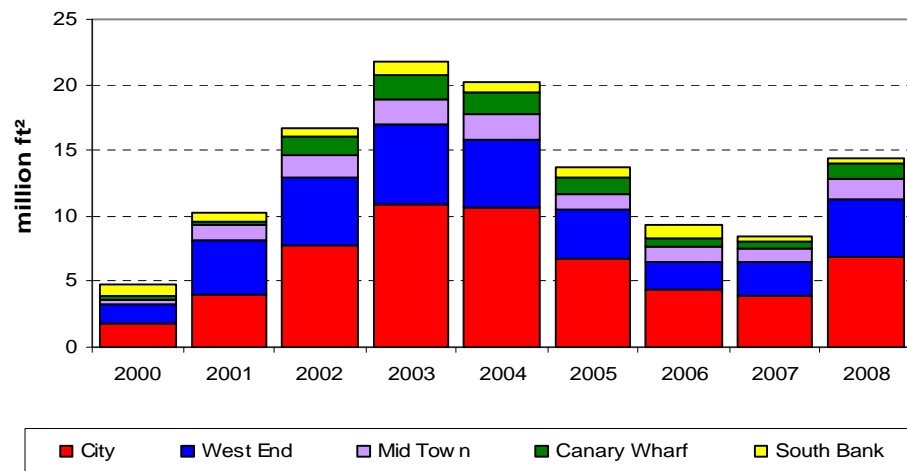
Chart 1 Central London office market dynamics (2000-2008)



Source: King Sturge Research

- 4.7. In 2008, Central London occupier demand slowed sharply, with take-up totalling 8.1 m ft², underperforming the historic average of 10.4 m ft². The core accounted for 71% of this, with the remainder in the fringe markets (a similar ratio to the previous year). Within the lower overall take-up figures, the main sectoral trend has been the reduction in the share of financial services demand since 2007. This illustrated in Chart 1.

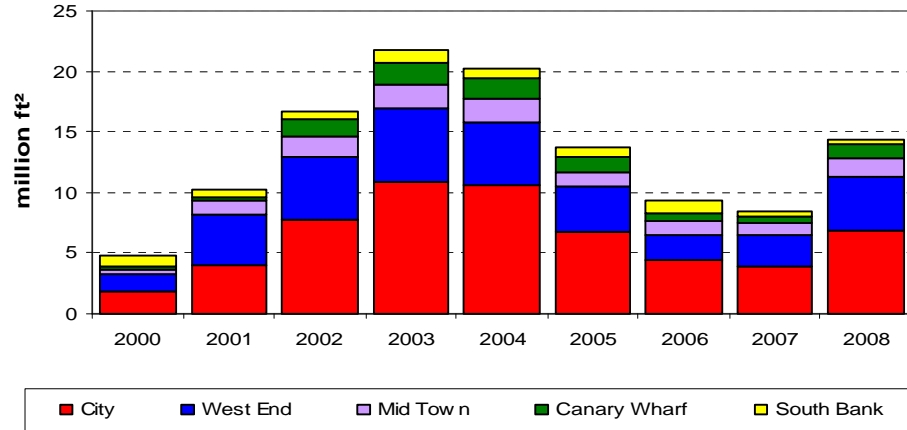
Chart 2 Office availability in Central London (2000-2008)



Source: King Sturge Research

4.8. As shown in Chart 2 WCL markets accounted for just over half of the capital's take-up between 2000 and 2008. This equates to an annual average of 5.3m ft², with the 2008 total at 3.7m ft².

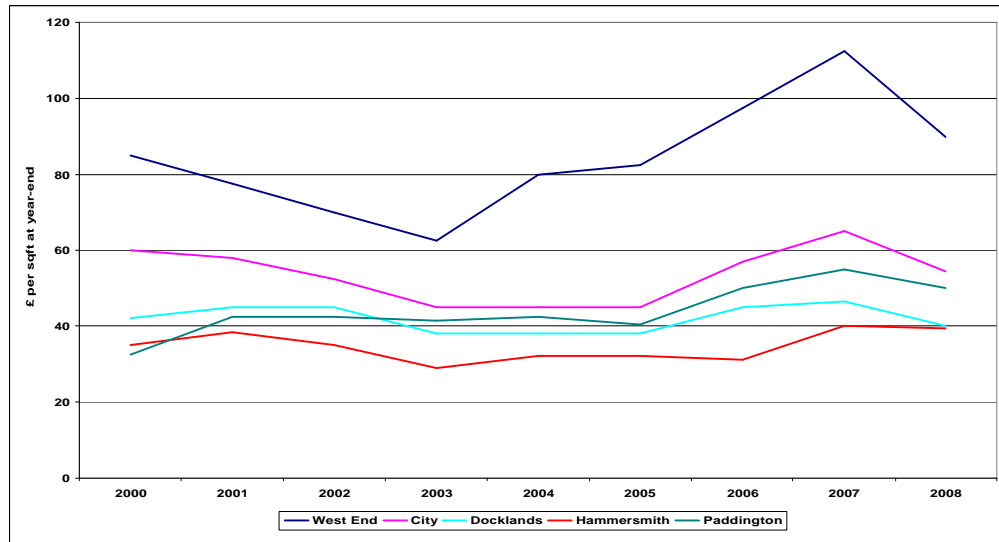
Chart 3 Office take-up in Central London (2000-2008)



Source: King Sturge Research

4.9. Chart 3 shows office take-up between 2000 and 2008. Newly-established Urban Quarters (see section 5) have accounted for an important 8% (or 3.6m ft²) of total take-up in WCL since the turn of the decade, with Cardinal Place lettings of 542,800 ft², Paddington at 1.4m ft² and More London at 1.6 million ft².

Chart 4 London prime office rental values per ft² pa



Source: King Sturge Research

⁵ This excludes the pre-let to the GLA at More London in 1999, contributing a further 122,800ft².

- 4.10. As illustrated in Chart 4, typically, prime West End office rents (which are the highest in the world) are more than twice the rental levels in Hammersmith, Paddington and Docklands (Canary Wharf) which demonstrates a high level of demand relative to the current restricted supply of modern office space in the West End.

Future London office demand and supply

- 4.11. The current office market slowdown is a consequence of the difficult economic conditions in the UK and is not likely to be sustained. It is expected that signs of recovery will be apparent from next year and that over the medium to long term, normal levels of office development will resume, continuing the expansionary trend of the last two or three decades.
- 4.12. Previous studies give a range of estimates of office floorspace needs based on a variety of job projections, most of which pre-date the 2008/09 credit crunch. As explained in the socio-economic analysis, since the autumn 2008 banking crisis, there has been a downgrading of short term economic forecasts (that is, for the next 5 years) and so it is important to re-assess these calculations.
- 4.13. According to Experian's spring 2009 view, the long-term (15+ years) outlook for London remains healthy by UK standards, with job growth underpinned by business services. But the rate of employment creation in the capital is more moderate than over the last 15 years and also considerably less strong than in the official GLA-Volterra/LP forecasts for 2006 to 2026.
- 4.14. Table 2 includes total employment and a definition of office jobs, as not all new positions will have office space consequences⁶. Experian expects just over 380,000 new jobs in London, with 175,000 of these in office sectors. In the two boroughs of LBHF and RBKC combined, the totals are 18,700 (all) and 13,800 (offices). The contributions are relatively even, with business services the main sectoral driver. This contrasts with projections used in the LP suggesting 51,000 extra jobs for the boroughs combined, with a particularly strong contribution from LBHF employment.

⁶ Office jobs include all financial and business services, plus communications and public administration sectors on an SIC-92 basis

Table 2 Employment growth in London, 2006-26

		Jobs		2006-26	
		2006	2026	Change	%
London	Total	4,626,151	5,007,188	381,037	8.2
	Office jobs	1,839,139	2,013,882	174,743	9.5
West London ⁷	Total	1,468,006	1,534,081	66,075	4.5
	Office jobs	557,730	598,218	40,488	7.3
LBHF	Total	130,384	140,406	10,022	7.7
	Office jobs	42,948	50,394	7,446	17.3
RBKC	Total	129,939	138,608	8,669	6.7
	Office jobs	35,111	41,480	6,369	18.1
Total RBKC and LBHF	Total	260,323	279,014	18,691	7.2
	Office jobs	78,059	91,874	13,815	17.7

Source: Experian, spring 2009

- 4.15. Experian job figures suggest an office floorspace demand in LBHF and RBKC of 225,000m² out of the 2.85 million m² in London as a whole⁸. This is a smaller estimate than the previous land-use studies or the LOPR, as a consequence of Experian's lower employment profile. For comparison, the LP employment estimates would suggest a requirement of over 600,000m² of office space.

Table 3 Central London Development Pipeline (2009 forwards)

	Speculative Under Construction		Speculative Planning Permission Granted	
	ft ²	% of total	ft ²	% of total
West End	3,151,731	30	3,356,065	18
Midtown	675,882	6	5,211,886	29
South Bank	663,417	6	2,056,268	11
City	4,954,346	47	2,632,713	15
Docklands	1,155,871	11	4,890,839	27
Central London	10,601,247		18,147,771	
West Central London	4,491,030	42	10,624,219	59

Source: King Sturge Research

⁷ Includes employment in RBKC and LBHF and all adjacent boroughs, Westminster, Wandsworth, Richmond, Hounslow, Ealing and Brent

⁸ Assuming a fixed density of 16.3m² (175ft²) per worker, as used in the 2007 London Office Property Review pg 42 scenario one, see also Review of Planning Documents

- 4.16. Supply must also be considered. There is currently 10.6m ft² (or 1 million m²) of speculative office space under construction in Central London. This figure has fallen by a third in the last 12 months. In addition, there is a further 18.1m ft² (1.7 million m²) potential supply from planning permissions granted, also well down on a year ago.
- 4.17. WCL figures include planned developments at both Paddington and Kings Cross. These show 4.5m ft² (420,000m²) under construction and 10.6m ft² (1 million m²) of space with permission – a similar total to last year.
- 4.18. The Central London figures do not include LBHF and RBKC markets, which lie outside of this area. The most recent London office survey indicated a 160,000m² total supply in the two boroughs, but Focus data indicates availability of 170,000m² in early 2009. Overall, the latest demand and supply estimates suggest approximate balance in London as a whole and a potential for excess-demand in the LBHF and RBKC boroughs.
- 4.19. It should be remembered, however, that studies stressing job-based estimates of demand are conservative, lower-bound estimates, making no allowance for obsolescence, depreciation, demolition or clustering. Moreover, supply conditions are highly fluid. There is likely to be a further decline in speculative space until the market recovers, though this may be partly offset by rising availability.
- 4.20. Comparison with market figures highlights the potential to underestimate office needs. Since 2000, average annual take-up has been over 5m ft² (500,000m²) in WCL and with development on hold, current supply could disappear within three years.
- 4.21. From this perspective, there would be a strong case for a space-release valve in West London over the next decade.
- 4.22. Moreover, while employment forecasts are very useful, they only provide a baseline. Experian's figures are based on macroeconomic variables and will not reflect the microeconomic changes caused by infrastructure or development. Their models will tend to assume similar patterns of job creation and occupier demand in West London, for instance, with most resident skilled workers commuting out to core markets and the town centres providing residual opportunities for the rest.
- 4.23. A sufficiently large office-led project such as an Urban Quarter development would require a significant quantum of office space to attract high value-added industries. By providing this, a much larger workforce could be captured by retaining local out-commuters and by attracting people who would otherwise go to other London markets.
- 4.24. A West London jobs estimate is included in Table 2 to provide a guideline for an Urban Quarter catchment⁹. This shows office job creation of over 40,000 by 2026. This indicates a possible allocation of 650,000m² (6 million ft²) offices, which is comparable with established office-led developments elsewhere in the capital. Casting the catchment wider, the London-wide catchment of 175,000 jobs or 2.9 million m² of offices highlights further potential opportunity for a large-scale development.

⁹ West London defined as in table 3

- 4.25. Such a development would also provide potential additionality, creating new demand that would not otherwise exist¹⁰. In particular, there will be multiplier effects created by the larger workforce who then spend more income in the local area and also indirect supply chain benefits accruing to local firms. These will be absent from Experian figures, but English Partnership (now the Homes and Communities Agency) estimates these could add 30% to the local impact of an office project¹¹.

¹⁰ See <http://www.urcs-online.co.uk/webmaster3/files/urcs/website/backgroundDocuments/Document/Additionality%20Guide.pdf>

¹¹ Op cit. pg 23 table 4.7

5 LONDON'S URBAN QUARTERS

- 5.1 Over the last 25 years, the London office market has been characterised by the growth of Urban Quarters (UQ), subsidiary to the core West End and City markets. These mix-use developments have varied significantly in character, but all are categorised by a significant office component and supported by retail, leisure and residential property (Table 3 summarises the main schemes).
- 5.2 Experience points to several necessary ingredients for the success of an Urban Quarter. As noted, a large office component is critical in creating a destination workplace to attract and retain the high value-added employees from outside of the normal local catchment. This commercial space is, in turn, critical for supporting the retail and leisure element of the UQ in the daytime hours.
- 5.3 Within the office jobs umbrella, high value-added sectors that could be targeted would include:
- Creative Industries
 - Technology, media and telecommunications
 - Business and professional services
- 5.4 Specialised space such as small enterprise incubator units may also be included to attract start-ups in these sectors.
- 5.5 There may also be potential in other industries. Public sector bodies in London may want to take advantage of the cheaper rents and better quality floorspace offered. Corporates too may wish to move out of expensive core London buildings, or the west may provide an alternative to the Thames Valley with better public transport.
- 5.6 Strong transport links have been vital to the established UQs. Major rail interchanges are a feature of recent successful schemes, including Broadgate, Cardinal Place, Kings Cross and Paddington.
- 5.7 An important strength of West London as an UQ destination is its strong transport links via air (with quick access to both Heathrow and Gatwick by train), rail (from Willesden Junction via West Brompton to Clapham Junction), underground (District and Piccadilly lines) and bus.
- 5.8 In addition, improvements are in prospect with plans to upgrade to capacity of the underground network, plus the benefits of Crossrail (within easy access at Paddington) after 2017. Over recent years, office schemes with strong public transport have also let better than business parks, with sustainability arguments reinforcing this.
- 5.9 Sufficient retail and leisure elements has also been key to successful UQs, particularly in more isolated locations such as Canary Wharf. This provision involves not only shops and restaurants, but also hotels and health clubs, which are present in Canary Wharf, More London, Broadgate and Chiswick Park and will be available at Kings Cross and Wood Wharf.

Table 3 Urban Quarters in Central London

No.	Urban Quarter	Offices (ft ²)	Residential (units)	Retail (ft ²)	Other
1	Paddington	1.3 million (955,300)	219 (3 buildings)	55,000 (c.64,000)	Leisure, surface and tiered amphitheatre
2	Canary Wharf	16 million	15,000 +	662,000	2 Hotels, leisure, 20 acres of landscaped open space, health club
3	More London	1.8 million	none	88,300	Hotel, health club, amphitheatre
4	Broadgate	4.8 million	none	53 Units	Hotel and health club
5	Kings Cross Central	4 million	1,900	495,000	Hotels, Serviced apartments, Student accommodation, leisure, health, education
6	Wood Wharf	Share of 3.5 million ft ² of commercial space	1,400	TBC	Health centre, park, world-class water-space, hotel, leisure, community services, new high street
7	Stratford City	Landmark towers	4,800 units	1,600,000	Hotel, leisure, parks, health centre and car parking

(E) = Established

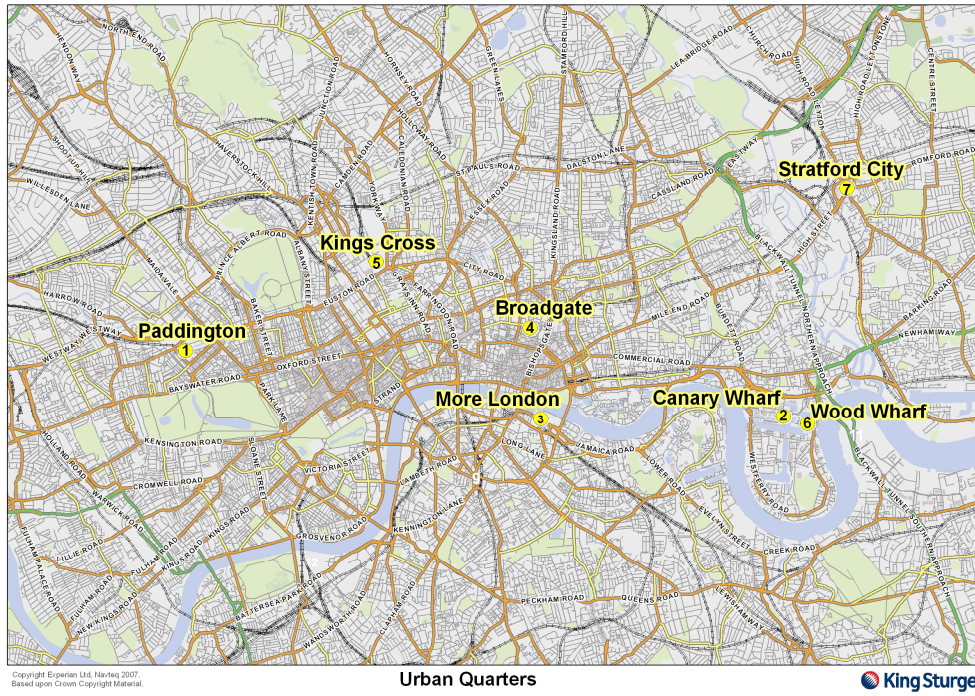
(P) = Projected

Source: King Sturge

Floorspace / unit figures for Established Urban Quarters relate to completed buildings and buildings under construction, figures in brackets relate to proposed floorspace

- 5.10. Overall, there is the potential for a West London UQ to compare with Paddington and More London and provide a counter-weight to Canary Wharf in the east and Kings Cross in the north. As noted, such a scheme would need to be large enough to attract occupiers in high valued-added sectors and to divert skilled workers from both the local boroughs and from alternative commuting destinations in the west. This location would also minimise potential competition from other planned UQ office developments, notably Kings Cross.

Map 2 Urban Quarters in Central London



**6 EARLS COURT REGENERATION AREA OFFICE LAND USE –
ASSESSMENT AND CONCLUSIONS**

- 6.1 Hammersmith aside, the office market in LBHF and RBKC remains under-developed by the standards of Central London, despite good levels of connectivity.
- 6.2 West London has the capacity to provide an extra 13,800-40,000 office jobs over the next two decades – this would require an additional office floorspace of between 225,000m² and 650,000m² over the period based on a standard 16.3m² a worker density. London wide the capacity required is 2.85m².
- 6.3 This demand provides an opportunity to create a new business district or Urban Quarter at the Earls Court Regeneration Area, exploiting excellent public transport access and with a substantial enough office element to attract major corporate occupiers and highly-skilled workers from across London and the South East.
- 6.4 A total office stock of around 4-6 m ft² (400,000 to 550,000m²) would be needed for this new business destination given the potential demand and competing supply. This would be similar to established UQ schemes at Broadgate and Kings Cross as well as making this mixed use successful as well as complementing existing office locations in West London.
- 6.5 A new West London Urban Quarter, together with Paddington (1.3 - 2m ft²) and Hammersmith with (8.4m ft²), could eventually total between 13.7m ft² and 16.4m ft² to be built from 2015 to 2026 and beyond. This will re-dress the balance between West and East London. The central Canary Wharf scheme now totals over 16m ft² (excluding surrounding office schemes).
- 6.6 The lack of large floorplate offices in the West End of London (many lettings are below 50,000 ft²) has already created demand for space at Paddington. This trend and the leasing of the Empress State building (364,900 ft² - 33,900m²) to the Metropolitan Police in 2004 demonstrates a market demand for larger buildings.
- 6.7 Typically, prime West End office rents (which are the highest in the world) are more than twice the rental levels in Hammersmith, Paddington and Docklands (Canary Wharf) which demonstrates a high level of demand relative to the current restricted supply of modern office space in the West End.

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June 2009



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EARLS COURT REGENERATION AREA

CORE STRATEGY EVIDENCE BASE

PLANNING POLICY STUDY

JUNE 2009

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- 2. PLANNING POLICY FRAMEWORK OVERVIEW**
- 3. NATIONAL AND REGIONAL PLANNING POLICY EVALUATION**
- 4. EMERGING LOCAL PLANNING POLICY**
- 5. CONCLUSION**

1. INTRODUCTION

- 1.1 This study is submitted as part of the Core Strategy evidence base in support of the Earls Court Regeneration Area (Regeneration Area) and has been prepared for Capital & Counties on behalf of the Earls Court & Olympia Group. The study evaluates the planning policy context against which the allocation of the Regeneration Area in the Royal Borough of Kensington and Chelsea (RBKC) and London Borough of Hammersmith and Fulham (LBHF) Local Development Frameworks (LDF) should be assessed. An indicative land use budget for the Regeneration Area has been prepared and is considered in this study against the context of national, London and emerging local planning policy. The indicative land use budget is set out in Appendix A.
- 1.2 Planning policy from the national to the local level supports the indicative land use budget and the inclusion of the Regeneration Area as a place and site allocation in the Core Strategy which will realise a full range of social, economic and environmental opportunities. Specifically, there is planning policy support for redevelopment which:
- Supports redevelopment which delivers comprehensive regeneration;
 - Provides a mix of uses that will bring vitality to area including residential, business, retail, hotel, leisure, community, destination and cultural;
 - Maximises the potential of transport infrastructure and supports sustainable travel choices;
 - Maximises the density of development;
 - Supports appropriately designed and located tall buildings which meet an economic need;
 - Promotes and advances innovation in sustainability; and
 - Provides high quality design of both buildings and public realm.
- 1.3 An evaluation of the opportunities afforded by the land use budget and how these sit within the planning policy framework at national, London and local level is considered in the following sections.
- 1.4 A suite of evidence base documents has been prepared. These are listed in Appendix B.

2. PLANNING POLICY FRAMEWORK OVERVIEW

2.1 The planning policy context for the Regeneration Area comprises three levels of policy – national, regional and local. Within each level there is both planning policy and guidance, which combine to provide the framework for the consideration of the Regeneration Area indicative land use budget. In short, the key planning policy documents taken into account at this stage include the following:

- Planning Policy Guidance Notes
 - PPG4: Industrial, Commercial Development and Small Firms (November 1992)
 - PPG13: Transport (April 2001)
 - PPG15: Planning and the Historic Environment (September 1994)
 - PPG17: Planning for Open Space, Sport and Recreation (July 2002)

- Planning Policy Statements
 - PPS1: Delivering Sustainable Development (January 2005)
 - PPS1 Supplement: Planning and Climate Change - Supplement to Planning Policy Statement 1 (December 2007)
 - PPS3: Housing (November 2006)
 - PPS6: Planning for Town Centres (March 2005)
 - PPS10: Planning for Sustainable Waste Management (July 2005)
 - PPS22: Renewable Energy (August 2004)
 - PPS25 Development and Flood Risk (2006)

- Consultation paper on a new Planning Policy Statement 4: Planning for Prosperous Economies (May 2009)

- The London Plan (2008) – consolidated with changes since 2004.

- London Borough of Hammersmith and Fulham Unitary Development Plan (2003)

- Royal Borough of Kensington and Chelsea Unitary Development Plan (2002)

- London Borough of Hammersmith and Fulham Core Strategy Options, June 2009

- Royal Borough of Kensington and Chelsea Core Strategy and the North Kensington Plan, *Towards Preferred Options*, July 2008

- Royal Borough of Kensington and Chelsea, Strategic Sites, Part of the Core Strategy with a focus on North Kensington, May 2009

- Royal Borough of Kensington and Chelsea, Places, Part of the Core Strategy with a focus on North Kensington, May 2009

2.2 This study provides an overview of the case for the indicative land use budget in relation to key planning policy documents as set out above. The other supporting

EARLS COURT REGENERATION AREA PLANNING POLICY STUDY

technical reports which comprise the evidence base in support of the indicative land use budget provide more detail and include reference to other relevant policy and guidance documents.

2.3 At both the regional and local level there is existing and emerging planning guidance which amplify policy and will help to inform a future Masterplan for the Earls Court Regeneration Area. Relevant guidance documents include:

- Planning for a Better London (2008).
- West London Sub Regional Development Framework (2006).
- London Housing Strategy (2009).
- London Strategic Housing Market Assessment (2009).
- London Transport Strategy (2006).
- London Transport Strategy Statement of Intent (2009).
- RBKC Transport SPD (2008).
- RBKC Draft Tall Buildings SPD (2008).
- LBHF Sustainable Construction SPD (2007).

National Planning Policy and Guidance

2.4 At the national level, Planning Policy Guidance notes ('PPGs') and Planning Policy Statements ('PPSs') provide the principal national planning guidance. Guidance can also be found in government white papers and advisory notes.

2.5 The Department for Communities and Local Government has recently published a consultation paper on the draft PPS4: Planning for Prosperous Economies. The draft PPS4 includes policies on retail and town centres and on economic development in urban and rural areas and will replace the existing PPG4, PPG5 and PPS6 if adopted in its current form.

Regional Planning Policy and Guidance

2.6 The London Plan is the guiding land use and planning document for the capital. As such it sets out the spatial strategy and policy context for how and where growth is to be accommodated. These objectives include optimising the development of previously developed land, promoting development in areas accessible by public transport and the potential of mixed use development to strengthen communities and local economies. The current London Plan was consolidated with alterations in February 2008.

2.7 The London Plan is about to undergo a period of review. The Mayor of London has recently published his initial proposals for a new London Plan. Adoption of a new London Plan is anticipated in the winter of 2011. Capital & Counties on behalf of the Earls Court & Olympia Group will be making representations on this and will, along with others, be promoting Earls Court Regeneration Area as an Opportunity Area.

Local Planning Policy and Guidance

2.8 Local planning policy and guidance is set out in the London Borough of Hammersmith and Fulham Unitary Development Plan (UDP) adopted in August 2003 as amended September 2007 and the Royal Borough of Kensington and Chelsea Unitary Development Plan (UDP) adopted in May 2002 as amended in September 2007.

2.9 The Planning & Compulsory Purchase Act 2004 provided for the saving of policies in adopted unitary development plans for a period of 3 years from the commencement of the Act, which was 28 September 2004. The boroughs identified policies that they wished to be extended which were submitted to the Secretary of State in accordance with a protocol issued by the Department for Communities and Local Government. The Secretary of State considered the boroughs' requests and on 27 September 2007 issued a direction under paragraph 1(3) of schedule 8 to the Planning and Compulsory Purchase Act 2004 to extend the life of certain saved policies. It is these policies which form the adopted UDPs for the boroughs.

Emerging Local Planning Policy and Guidance

2.10 The London Borough of Hammersmith and Fulham consulted on its Preferred Options on the Core Strategy and Site Allocations from June to August 2007. LBHF has recently published for consultation its Core Strategy Options, June 2009 which continues until mid July 2008. The borough currently expects adoption of the final Core Strategy in early 2011.

2.11 The nature of the Royal Borough of Kensington and Chelsea Core Strategy has evolved following formal consultation of Issues and Options (December 2005), Interim Issues and Options (February - April 2008) and Towards Preferred Options (July - October 2008). Following the current consultation on the 'Places' and 'Strategic Sites' sections of the Core Strategy RBKC plans to undertake further consultation on the Core Strategy from September to November 2009 ahead of its submission to the Secretary of State in March 2010.

3. NATIONAL AND REGIONAL PLANNING POLICY EVALUATION

- 3.1 This section evaluates the national and regional planning policy context against which the Earls Court Regeneration Area strategic site allocation and indicative land use budget should be considered.

Housing

National Policy

- *PPS3: Housing (November 2006)* seeks to widen opportunities for home ownership and affordability to ensure everyone can live in a decent home in a community they wish to be in that provides good access to jobs, services and infrastructure. In particular, it promotes “*making effective use of land, existing infrastructure and available public and private investment, particularly for mixed use developments*”. The objectives of the planning system are to deliver high quality housing; a mix of both market and affordable housing; a sufficient quantity of housing to meet housing need and demand; housing in locations which offer access to jobs and services; and a flexible and responsive supply of land which makes efficient use of land.

London Plan

- Increase the supply of housing in Hammersmith and Fulham and Kensington and Chelsea by the established targets – 450 and 350 homes per year, respectively (Policy 3A.1).
- Seek to exceed the targets and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality. Identify new sources of supply having regard to redevelopment of low density commercial sites to secure mixed use development. Intensification of housing provision through development at higher densities where consistent with the principles of sustainable residential quality (Policy 3A.2).
- Ensure development proposals achieve the maximum intensity of use compatible with local context, London Plan design principles and with public transport capacity (Policy 3A.3).
- Provide housing choice in terms of mix of sizes and types, taking into account the varying needs of residents and building to ‘Lifetime Homes’ standards (Policy 3A.5).
- Encourage large residential developments (and accompanying suitable non-residential uses) in areas of high public transport accessibility (Policy 3A.7).
- The strategic target for affordable housing provision is 50%, with a London-wide objective of 70% social housing and 30% intermediate, and the promotion of mixed and balanced communities (Policy 3A.9).
- Seek the maximum reasonable amount of affordable housing from residential and mixed-use schemes, having regard to borough affordable housing targets and the

need to encourage rather than restrain residential development and the individual circumstances of the site (including site costs, availability of public subsidy and other scheme requirements) (Policy 3A.10).

- Require affordable housing provision on a site which has capacity for 10 or more homes (Policy 3A.11).
- Prevent loss of housing, including affordable housing, without its replacement at existing or higher densities (Policy 3A.15)

Evaluation

- 3.2 The delivery of new housing in sustainable locations such as the Regeneration Area is supported by national, regional and local plan policy. The Regeneration Area has the potential to provide approximately 9,000 to 10,000 homes with a minimum of around 1,500 of these located within RBKC which would make a substantial contribution to meeting needs and targets of the London Plan. A regeneration scheme would provide a wide range of types of housing with different unit sizes and tenure arrangements. More detailed consideration of housing provision within the Regeneration Area is provided within the Housing Study.

Employment

National Policy

- *PPG4: Industrial, Commercial Development and Small Firms (November 1992)* seeks to encourage economic development in a way which is compatible with environmental objectives. This involves weighing the importance of industrial and commercial development with that of maintaining and improving environmental quality. In order to achieve this the following should be considered:
 - new development should be encouraged in accessible locations;
 - commercial and industrial development in areas which are primarily residential should not be unreasonably unrestricted if there would be no adverse affect on residential amenity; and
 - whether particular proposals for new development may be incompatible with existing industrial and commercial activities.
- *Consultation paper on a new PPS4: Planning for Prosperous Economies (May 2009)* seeks to encourage sustainable growth; support existing business sectors; identify and plan for new emerging sectors; recognise the benefits of certain types of business being located within proximity of each other or with other compatible land uses; take account of the different location requirements of businesses; and make use of planning tools where this will assist business development.

London Plan (2008)

- Provide a range of premises of different types, sizes and costs to meet the needs of different sectors of the economy and firms of different types and sizes and to

remove supply side blockages for key sectors, including the finance and business services sector (Policy 3B.1).

- To meet office demand and supply:
 - Seek a significant increment to current office stock through changes of use and development of vacant brownfield sites
 - Seek the renovation and renewal of existing stock to increase and enhance the quality and flexibility of London's office market offer, in line with policies for maximising the intensity of development
 - Seek the provision of a variety of type, size and cost of office premises to meet the needs of all sectors, including small and medium sized enterprises (Policy 3B.2)

Evaluation

- 3.3 The Regeneration Area has the potential to deliver a significant amount of employment floorspace and opportunities through the redevelopment of brownfield land in a strategic and accessible location. Evidence contained within the supporting Summary Office Land Use Study indicates that there is demand to create a new business district or Urban Quarter with a substantial enough office element to attract workers from across London and the south east. Job opportunities would also be created through other elements of a comprehensive scheme providing an economic stimulus for the area. National policy guidance and the London Plan support the increase in the range, quality and flexibility of employment space and job creation through the mixed-use redevelopment of sites such as the Regeneration Area.

Town Centres and Retailing

National Policy

- *PPS6: Planning for Town Centres (March 2005)* seeks to promote the vitality and viability of town centres whilst making provision for a range of services to meet the needs of the entire community, encouraging investment to regenerate areas and promoting the economic growth of economies. This is intended to be achieved by enhancing consumer choice by making provision for a range of shopping, leisure and local services which meets the needs of the community; supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity; and improving accessibility.
- *Consultation paper on a new PPS4: Planning for Prosperous Economies (May 2009)* seeks to promote the vitality and viability of town and other centres as important places for communities and ensure they are all economically successful recognising that they are important drivers for regional, sub-regional and local economies. In order to achieve this new economic growth and development should be focused in existing centres; and competition between retailers and enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres, to meet the needs of the community is required.

London Plan

- Develop and enhance the network of international, Metropolitan, Major, District and specialist centres (Policy 2A.8).
- Identify more local and neighbourhood centres and those with distinct roles in meeting special needs (Policy 2A.8).
- Enhance access to goods and services and strengthen the wider role of town centres by:
 - Enhancing the quality of retail and other consumer services in town centres
 - Supporting a wider role for town centres as locations for leisure and cultural activities as well as business and housing and their key role in developing a sense of place and identity for sustainable local communities (Policy 3D.1)
- Prevent the loss of retail facilities that provide essential convenience and specialist shopping and to encourage mixed use development (Policy 3D.3).

Evaluation

- 3.4 The principle of additional retail development is consistent with national policy which aims to meet local needs and increase consumer choice. The scale of development envisaged for the Regeneration Area will generate additional demand for local retail facilities. The Retail Study explains the quantum of retail floorspace that could be justified by indigenous demand and concludes that the level of floorspace proposed in the indicative land use budget can be sustained without giving rise to unacceptable levels of impact.
- 3.5 Designating the Regeneration Area as a new district centre would be in accordance with national policy and objectives to encourage investment, regeneration and economic growth. It would also be consistent with London Plan aims to develop and enhance the retail hierarchy and support for the wider role of town centres and their contribution to sense of place and identity for sustainable local communities.

Tourism, Visitor Accommodation and Facilities

London Plan

- Enhance the quality and appeal of London's existing tourism offer and create integrated and sustainable tourism provision in town centres and other locations across London with good public transport access (Policy 3B.9).
- Achieve 40,000 net additional hotel rooms by 2026 and improve the quality, variety and distribution of visitor accommodation and bring forward an international convention centre:
 - Develop new hotels in areas with good public transport to central London and international and national transport termini

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- Accommodate smaller scale provision in CAZ fringe location with good public transport and resist further intensification of provision in areas of existing concentration, except where it will not compromise local amenity or the balance of local land uses
- Support existing and encourage development of new tourist attractions which complement the wider policies of this plan, especially for regeneration and town centre renewal (Policy 3D.7)

Evaluation

- 3.6 The Regeneration Area is well located to provide hotel development to help meet London Plan targets for additional hotel rooms by 2026. The Summary Hotel Study highlights the level of unmet demand across London and shortcomings of existing facilities in the area. Based on the external demand drivers it is considered that 45,000 – 65,000 sqm (900 – 1,300 rooms) would provide adequate hotel accommodation for the Regeneration Area.
- 3.7 The Regeneration Area (excluding the current site occupied by EC1 and EC2) could be a potential location for an International Convention Centre if Olympia or another site were not to come forward, as explained in the Summary Potential International Convention Centre Study. This would be subject to further assessment and viability.

Community Services

National Policy

- *PPSI: Delivering Sustainable Development (January 2005)* seeks to provide key services for all members of the community to ensure that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs.

London Plan

- Ensure that the adequate provision of social infrastructure and community facilities are provided in major areas of new development and regeneration. These needs include primary healthcare facilities, children's play and recreation facilities, services for young people, older people and disabled people, as well as libraries, sports and leisure facilities, open space, schools, nurseries and community halls. These facilities should be within reach by walking and public transport for the population that will use them (Policy 3A.18).
- Support the provision of additional healthcare as identified by the strategic health authority and primary care trusts. The preferred location for hospitals, primary health care centres, GP practices and dentists should be identified in appropriate locations accessible by public transport (Policy 3A.21).
- When approaching the provision of different types of educational facilities Boroughs should take into account the need for new facilities, with particular reference to Areas for Regeneration; the potential for expansion of existing provision; the possibility of inter-borough provision; safe and convenient access by pedestrians, cyclists and by public transport users; and proximity to homes and workplaces (Policy 3A.24).

Evaluation

- 3.8 Allowance for new local community facilities has been included in the indicative land use budget. In accordance with national and London Plan policy the vision proposes creating a sustainable community including local facilities which will derive from other land uses within the Regeneration Area. Such local community facilities could include educational, training, health, libraries, community hall etc. There is scope to integrate such facilities to provide convenient access, as explained in the Earls Court Regeneration Area Framework and the Design Principles Summary Study. The approach to local community facilities will be developed as a masterplan for the Regeneration Area comes forward.

Leisure, Culture and Recreation

National Policy

- *PPG17: Planning for Open Space, Sport and Recreation (July 2002)* - this relates to ensuring the provision of open space, sport and recreation facilities within proposed developments, to meet the needs of the local community. Local networks of high quality well managed and maintained open spaces, sports and recreational facilities can help urban environments that are attractive, clean and safe. These facilities can also help promote social inclusion and community cohesion by providing a focal point for community activities. By ensuring that these facilities are easily accessible by walking and cycling and that more heavily used facilities are planned for locations well served by public transport this help promote more sustainable development.

London Plan

- Promote London's cultural and art facilities as visitor attractions and foster their contribution to both local regeneration and London's global economic offer (Policy 3D.4).
- Protect, promote and improve access to London's network of open spaces. All developments will be expected to incorporate appropriate elements of open space that make a positive contribution to and are integrated with the wider network (Policy 3D.8).
- Ensure that all children have safe access to good quality, well designed, secure and stimulating play and informal recreation provision. Provision for play and informal recreation in new housing developments should be based on the expected child population generated by the scheme and an assessment of future needs (Policy 3D.13).

Evaluation

- 3.9 Leisure, culture and recreation facilities will be an important component of any scheme coming forward in the Regeneration Area, providing amenities for those living and working on the site as well as potentially acting as a draw in their own right. The type and nature of these uses proposed will reflect trends and respond to other uses within the regeneration scheme. They will contribute to creating a sense of place,

adding vitality and diversity in accordance with national and London Plan policy. As explained in the Culture, Destination and Leisure Study there is sufficient demand and requirement for a sustainable mix of uses to support the level of this type of floorspace in the indicative land use budget.

- 3.10 In addition, formal and informal areas of open space and improved linkages to existing facilities will provide recreation and amenity opportunities in accordance with the London Plan. This is described in the Design Principles Summary Study.

Sustainability and Energy

National Policy

- *PPS 1: Delivering Sustainable Development (January 2005)* seeks to facilitate and promote sustainable and inclusive patterns of development by making land available for development in line with economic, social and environmental objectives to improve people's quality of life; contributing to sustainable economic development; protecting and enhancing the natural and historic environment and existing communities; and ensuring high quality development through good inclusive design, and the efficient use of resources.
- *PPS: Planning and Climate Change - Supplement to Planning Policy Statement 1 (December 2007)* - this document sets out how the planning system should contribute to reducing emissions and stabilising climate change, emphasising the fundamental importance of planning in delivering sustainable development. The UK Government's Energy White Paper aims "to put the UK on a path to cut its carbon dioxide emissions by some 60% by 2050, with real progress by 2020".
- *PPS22: Renewable Energy (August 2004)* – Support is given for on-site renewables where it is viable given the type of development proposed, its location, and design. Increased development of renewable energy resources is considered to be vital to facilitating the delivery of the Government's commitment on both climate change and renewable energy.

London Plan

- The Mayor will, and boroughs and other stakeholders should promote, support and encourage the development of London in ways that secure the plan's social, environmental and economic objectives. This will include using the following criteria:
 - Optimise the use of previously developed land and vacant or underutilised buildings;
 - Ensure development occurs in locations that are currently, or will be, accessible by public transport, walking and cycling; and
 - Take account of the sustainability of sites for mixed use development and the contribution that development might make to strengthening local communities and economies including opportunities for local businesses and for the training of local people (Policy 2A.1).
- Ensure future developments meet the highest standards of sustainable design and construction (Policy 4A.3)

- Facilitate and encourage the use of all forms of energy efficiency measures and renewable energy where appropriate (Policy 4A.7)

Evaluation

- 3.11 The Regeneration Area will allow future development proposals to achieve high levels of design in sustainability and construction. The Summary Sustainability Approach explains strategies that could be employed in accordance with national and regional policy objectives.
- 3.12 The site location, size and surroundings provide an opportunity to deliver sustainable development on a large community level in accordance with national and London Plan policy. The Regeneration Area has the potential to provide a wide range of building types and tenures as well as public and private open space. The varied mix of uses will provide opportunities for creating spaces of high architectural quality and interest, with the potential for implementing large scale community energy and waste strategies contributing to a socially, economically and environmentally sustainable local community.

Transport

National Policy

- *PPG13: Transport (April 2001)* seeks to “integrate planning and transport to promote more sustainable transport choices; promote accessibility to jobs, shopping, leisure facilities and services by public transport and cycling, and; reduce the need to travel, especially by car”. By influencing factors such as the location, scale, density, design and mix of land uses, planning can help reduce the need to travel and the length of journeys while promoting sustainable modes of travel such as transport, walking and cycling. Specifically, major transport generating development and uses (including offices, retail, commercial, leisure, hospitals and conference facilities) should be located near public transport interchanges so that the fullest use can be made of this infrastructure. Wherever possible, a mix of uses, including residential, should be combined to achieve this level of use.

London Plan

- Ensure the integration of transport and development by:
 - Encouraging patterns and forms of development that reduce the need to travel especially by car
 - Improving public transport capacity and accessibility, where it is needed, for areas of greatest demand and areas designated for development and regeneration
 - Supporting high trip generating development only at locations with high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect the levels of public transport accessibility (Policy 3C.1)
- Support sustainable transport:

- Support measures that encourage shifts to more sustainable modes and appropriate demand management
- Improve provision of bus services, cycling and pedestrian facilities and local means of transport to improve accessibility to jobs and services for the residents of deprived areas (Policy 3C.3)

- Improve links between London and the surrounding regions (Policy 3C.5).

- Improve the strategic public transport system by extending the East London Line and other enhancements to the London Overground network, which incorporates the West London Line, towards completion of an orbital rail network (Policy 3C.12).

- Ensure road scheme proposals contribute to economic regeneration and development, provide a net benefit to London's environment, improve safety and conditions and integrate with local and strategic land use planning policies (Policy 3C.16).

Evaluation

- 3.13 The Regeneration Area benefits from good transport links. A regeneration scheme would be based on a sustainable transport strategy, encouraging non car borne modes of transport, in accordance with national and London Plan policy. The implications arising from a large scale mixed use development have been assessed in the Transport Study. The study indicates that the transport demand resulting from the indicative land use budget can be accommodated with the provision of additional transport infrastructure complemented by a package of planning and transport measures to promote sustainable travel choices. A regeneration scheme also has the opportunity to improve existing transport issues local to the Regeneration Area which is advocated by national and London Plan policy.

Design, Tall Buildings and Built Heritage

National Policy

- *PPS1 – Delivering Sustainable Development (January 2005)* seeks that good design should:
 - address the connections between people and places by considering the needs of people to access jobs and key services;
 - be integrated into the existing urban form and the natural and built environments;
 - be an integral part of the process for ensuring successful, safe and inclusive villages, town and cities;
 - create an environment where everyone can access and benefit from the full range of opportunities available to members of society; and
 - consider the direct and indirect impacts on the natural environment.

- PPS1 seeks to ensure that developments:

- are sustainable, durable, adaptable and make efficient use of resources;
 - optimize the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
 - respond to their local context;
 - create safe and accessible environments;
 - address the needs of all society and are accessible, usable and easy to understand; and
 - are visually attractive as a result of good architecture and appropriate landscaping.
- *PPG15: Planning and the Historic Environment (September 1994)* - provides a full statement of government policies for the identification and protection of historic buildings, Conservation Areas and other elements of the historic environment. There is a general Government commitment to preserve the historic environment. It explains that the objective of planning processes should be to reconcile the need for economic growth with the need to protect the natural and historic environment (paragraph 1.2).

PPG15 provides that special attention shall be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a Conservation Area. This requirement extends to all powers under the Planning Acts, not only those that relate directly to historic buildings. The desirability of preserving or enhancing the area should also, in the Secretary of State's view, be a material consideration in the planning authority's handling of development proposals that are outside the Conservation Area but would affect its setting, or views into or out of the area (Paragraph 4.14).

PPG15 requires authorities considering applications for planning permission or listed building consent for works which affect a listed building to have special regard to certain matters, including the desirability of preserving the setting of the building (Paragraph 2.16).

London Plan

- Ensure that developments should:
 - Maximise the potential of sites
 - Promote high quality inclusive design and create or enhance the public realm
 - Provide or enhance a mix of uses
 - Contribute to adaptation to, and mitigation of, the effects of climate change
 - Respect local context, history, built heritage, character and communities
 - Provide for or enhance a mix of uses
 - Be accessible, usable and permeable for all users
 - Be sustainable, adaptable and durable in terms of design, construction and use
 - Address security issues and provide safe, secure and sustainable environments
 - Be practical and legible
 - Be attractive to look at, and, where appropriate, inspire, excite and delight
 - Respect the natural environment and biodiversity

- Address health inequalities (Policy 4B.1)
- Promote world-class high quality design (Policy 4B.2).
- The Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings. The Mayor will, and boroughs should, consider all applications for tall buildings against the criteria set out in Policies 4B.1, 4B.3 and 4B.9.

The Mayor will work with boroughs and the strategic partnerships to help identify suitable locations for tall buildings that should be included in UDPs and Sub-Regional Development Frameworks. These may include parts of the Central Activities Zone and some Opportunity Areas.

Boroughs should take into account the reasons why the Mayor may support tall buildings when assessing planning applications that are referable to the Mayor. Boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their UDPs. In doing so, they should clearly explain what aspects of local character could be affected and why. They should not impose unsubstantiated borough-wide height restrictions.

- All large scale buildings including tall buildings should be of the highest quality and design and in particular:
 - Meet the requirements of the View Management Framework
 - Be attractive city elements as viewed from angles and where appropriate contribute to an interesting skyline, consolidating clusters within that skyline or providing key foci within views (Policy 4B.10)
- Protect and enhance London's historic environment and seek to maintain and increase the contribution of the built heritage (Policy 4B.11).
- Ensure the protection and enhancement of historic assets in London and identify areas, spaces, historic parks and gardens and buildings of special character or quality for protection and opportunities for enhancement (Policy 4B.12).

Evaluation

3.14 Any development coming forward within the Regeneration Area would achieve high levels of urban design and architectural treatment respecting its townscape context. A masterplan and subsequent scheme would be worked up within established policy guidance and the terms of recognised good practice, consistent with planning policy (specifically PPS1, PPG15 and the London Plan). The masterplan would consider layout principles, urban grain, massing envelopes, architectural typologies and urban form and would identify the specific parts of the Regeneration Area where tall buildings are appropriate.

3.15 The suitability of the Regeneration Area for tall buildings is considered in the Summary Townscape and Tall Building Study, which concludes that the Regeneration

Area can be an appropriate location for tall buildings. The justification for this includes:

- Due to its size and accessibility there is scope for the Regeneration Area to establish its own architectural identity and accommodate tall buildings;
- Tall buildings would optimise the potential of the Regeneration Area in accordance with PPS1.
- The Regeneration Area is capable of accommodating tall buildings that are appropriate to local context in accordance with PPG15. A Masterplan for the Regeneration Area would come forward in line with the Design Principles Summary Study and would be appropriate to the settings of local conservation areas. Tall buildings, visible from greater distances, would be designed so as to enhance views into and out of conservation areas further afield.
- The Regeneration Area has excellent transport connections that could support the population density brought by a cluster of tall buildings, and such a central London location requires the efficient land-use that tall buildings allow, freeing up room for open spaces and improved routes through the area.
- The Regeneration Area provides the opportunity to deliver a new economic cluster of related activities. Tall buildings are supported in such locations by the London Plan. Also in accordance with the London Plan, tall buildings within the Regeneration Area could act as a catalyst for regeneration, renewal and economic activity in their own right.

3.16 According to the existing planning policy framework, the Regeneration Area is an appropriate location for tall buildings in principle. Future proposals will ensure that tall buildings will be appropriately sited within the Regeneration Area itself and designed so as to enhance the local and wider townscape, in accordance with policy criteria. In accordance with national and regional policy and guidance, design proposals for tall buildings should be judged in the round and on their specific merits: policy supports the notion that tall buildings may have an acceptable impact on even sensitive views if they are well designed.

Waste

National Policy

- *PPS10: Planning for Sustainable Waste Management (July 2005)* – seeks to protect human health and the environment by promoting the production of less waste and use of it as a resource wherever possible. Through more sustainable waste management PPS10 promotes the management of waste up the waste hierarchy of reduction, re-use, recycling and composting, using waste as a source of energy, and only disposing as a last resort. It should also be ensured that the design and layout of new development supports sustainable waste management.

London Plan

- It is the Mayor's aim to ensure that facilities with sufficient capacity is provided to manage up to 85% (20.6 million tonnes) of waste arising within London by 2020; minimise the level of waste generated; increase re-use and recycling and composting of waste, and reduce landfill disposal; minimise the amount of energy used, and transport impacts from, the collection, treatment and disposal of waste; and promote generation of renewable energy and renewable hydrogen from waste (Policy 4A.21).
- In support of the aim of driving waste up the waste hierarchy, the objectives of communities taking more responsibility for their own waste and the need to plan for all waste streams the Mayor aims to:
 - safeguard all existing waste management sites;
 - require the re-use of surplus waste transfer sites for other waste uses;
 - identify new sites in suitable locations for new recycling and waste treatment facilities;
 - require the provision of suitable waste and recycling storage facilities in all new developments;
 - support appropriate developments for manufacturing related to recycled waste;
 - support treatment facilities to recover value from residual waste;
 - where waste cannot be dealt with locally, promote waste facilities that have good access to rail transport or the blue ribbon network; and
 - safeguard waste sites, including wharves, with and existing or future potential for waste management and ensure that adjacent development is designed accordingly to minimise the potential for conflicts of use and disturbance. (Policy 4A.22)
- Boroughs should identify sites and allocate sufficient land for waste management and disposal, employing the following criteria:
 - proximity to source of waste;
 - the nature of activity proposed and its scale
 - the environmental impact on surrounding areas;
 - the full transport impact of all collection, transfer and disposal movements; and
 - primarily using sites that are located on Preferred Industrial Locations or existing waste management locations (Policy 4A.23).
- Boroughs should identify adequate provision for the scale of waste use identified. The broad locations for these facilities are Strategic Industrial Locations (Preferred Industrial Locations and Industrial Business Parks), Local Employment Areas, and Existing Waste Management Sites. Suitable brownfield sites and contaminated land elsewhere may also provide opportunities (Policy 4A.27).

Evaluation

- 3.17 A regeneration scheme would deal with waste arising from the development as part of a sustainable waste strategy in accordance with national and London Plan policy.

3.18 The site is not suitable for managing waste generated by activities elsewhere in the borough, as explained in the Summary Infrastructure and Waste Study. In particular the Regeneration Area land within RBKC does not fall within one of preferred type of locations identified in the London Plan as suitable for waste facilities to meet borough apportionment requirements, nor in the context of national and London Plan policies, is it suitable for managing waste generated in the wider area.

Flooding

National Policy

- *PPS25: Development and Flood Risk (2006)* – seeks to ensure that flood risk is taken in to account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. PPS25 requires Local Planning Authorities in determining planning applications to:
 - Ensure that planning applications are supported by site-specific flood risk assessments;
 - Apply the sequential approach at a site level to minimise risk by directing the most vulnerable development to areas of lowest flood risk, matching vulnerability of land use to flood risk;
 - Ensure that all new development in flood risk areas is appropriately flood resilient and resistant.

London Plan

- Boroughs should carry out strategic flood risk assessments to identify locations suitable for development and those required for flood risk management. Within areas at risk from flooding (flood zones) the assessment of flood risk for development proposals should be carried out in line with PPS25 (Policy 4A.12).
- Where development in areas at risk from flooding is permitted, the Mayor will, and boroughs and other agencies should, manage the existing risk of flooding, and the future increased risk and consequences of flooding as a result of climate change (Policy 4A.13).

Evaluation

- 3.19 The area located north west of the existing Earls Court Exhibition complex is in Flood Zone 3 as defined in PPS25, with a flood event risk of greater than 0.5% chance of occurring annually (a 1 in 200 year event). However, as with most London sites, the Environment Agency's classification does not take into account the presence of the flood defences which will clearly significantly reduce any flood risk. The same applies to many sites across London.
- 3.20 A small part of the Regeneration Area is located in Flood Zone 2 (medium probability of flooding), and the remainder (in and around the Exhibition Building) is located outside the fluvial floodplain (within Flood Zone 1).

4. EMERGING LOCAL PLANNING POLICY

- 4.1 This section considers London Borough of Hammersmith and Fulham and Royal Borough of Kensington and Chelsea emerging planning policy.
- 4.2 The London Borough of Hammersmith and Fulham has recently published for consultation its Core Strategy Options, June 2009. Building on the Community Strategy for the borough, key priorities for delivering the spatial vision for Hammersmith and Fulham are identified:
- Promoting home ownership.
 - Regenerating the most deprived parts of the borough.
 - A top quality education for all – schools of choice.
 - Setting the framework for a healthy borough.
 - Tackling crime and anti-social behaviour.
 - Creating a cleaner, greener borough.
 - Delivering high quality, value for money public services.
- 4.3 The consultation document presents a number of alternative scenarios for the future development of the borough and sets out a preferred option for the Regeneration Area. This preferred option seeks a comprehensive development of the three landholdings comprising the Regeneration Area for a mix of uses, including residential, employment, hotel, leisure and office uses. Envisioned as a vibrant world class new urban quarter, the option presented includes:
- A full range of new community facilities and open space.
 - Support for improving connectivity both within the Regeneration Area and beyond.
 - The potential for an ICC as part of a major refurbishment and/or development within the existing Earls Court & Olympia complexes.
 - The phased redevelopment of Gibbs Green and West Kensington estates.
 - Support for tall buildings.
- 4.4 Consultation on the Core Strategy Options continues until mid July 2009. The Borough currently expects adoption of the final Core Strategy in early 2011.
- 4.5 The Royal Borough of Kensington and Chelsea in its Towards Preferred Options, July 2008 identified seven strategic objectives to guide development over the period the LDF is in place:
- Keeping life local – ensuring local shops and community facilities are accessible to residents.
 - Fostering diversity – ensure a rich mix of entertainment and creative uses.
 - Better travel choices – to promote sustainable travel choices.
 - Caring for the public realm – to ensure an attractive borough and reflect its values of mutual respect and responsibility.
 - Renewing the legacy – to preserve and build upon the borough’s built environment.
 - Diversity of housing – to ensure a range of new homes in terms of size and tenure, built in high quality mixed communities.

- Respecting our environmental limits – to be at the cutting edge of environmental sustainability.
- 4.6 RBKC is now consulting on a series of places and strategic sites that are central to achieving the strategic objectives of the Core Strategy. It has identified 14 “places” requiring specific attention to place-making and integration of strategic objectives. The wider Earls Court area, of which the Regeneration Area is part, is one such place. The portion of the Regeneration Area located within Kensington and Chelsea has also been designated a Strategic Site, meaning its development is considered by the borough to be central to the achievement of strategic objectives for both the wider area and the Core Strategy itself. A brief delivery strategy has been proposed for the site which proposes continued exhibition centre uses and / or convention centre use, with additional potential for significantly more residential and office accommodation, subject to improved accessibility to the site
- 4.7 The Royal Borough of Kensington and Chelsea is currently scheduled to release a draft LDF Core Strategy in autumn 2009. The Examination in Public is expected to take place in autumn 2010.
- 4.8 Whilst emerging planning policy is still evolving, the strategic policy direction for the boroughs is identified in the emerging Core Strategies. Both Core Strategies seek to deliver comprehensive, well design and sustainable development. The Regeneration Area is an important strategic regeneration opportunity for both boroughs and has the ability to deliver key policy priorities and objectives.
- 4.9 The direction in which the Core Strategies are moving supports the principle of the Regeneration Area as a strategic mixed use development opportunity. Capital & Counties is making a number of representations to both Core Strategy consultations seeking various text adjustments to reflect the full opportunity of the Regeneration Area.

5. CONCLUSION

5.1 In conclusion, there is planning policy from the national to the local level which supports the indicative land use budget and the inclusion of the Earls Court Regeneration Area as a strategic site allocation and place in both Hammersmith and Fulham and Kensington and Chelsea Core Strategies which will realise a full range of social, economic and environmental opportunities. Specifically, there is planning policy support for redevelopment which, inter alia:

- Supports redevelopment which delivers comprehensive regeneration;
- Provides a mix of uses that will bring vitality to area including residential; business, retail, hotel, leisure, community, destination and cultural;
- Maximises the potential of transport infrastructure and supports sustainable travel choices;
- Maximises the density of development;
- Supports appropriately designed and located tall buildings which meet an economic need;
- Promotes and advances innovation in sustainability; and
- Provides high quality design of both buildings and public realm.

5.2 Whilst emerging planning policy is still evolving, the strategic policy direction for the boroughs is identified in the emerging Core Strategies. The vision for the Regeneration Area generally accords with the principles set out by the boroughs and provides the opportunity to deliver their key priorities and strategic objectives. Capital & Counties is making a number of representations to both Core Strategy consultations seeking various text adjustments to reflect the full opportunity of the Regeneration Area and to reflect national and London policy guidance.

DP9, June 2009

APPENDIX A

Indicative Land Use Budget

User Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

The above areas represent floorspace ranges. They are indicative at this stage and further analysis will be required to tailor the land use mix and quantum and its disposition across the Regeneration Area.

APPENDIX B

Evidence Base Documents

The following documents have been prepared in support of the comprehensive redevelopment of the Earls Court Regeneration Area:

- **Earls Court Regeneration Area Framework (June 2009).**
Produced by Urban Strategies Inc.
- **Design Principles Summary Study (June 2009).**
Produced by Benoy.
- **Summary Townscape and Tall Building Study**
Produced by Professor Robert Tavernor Consultancy and Cityscape (June 2009).
- **Summary Socio Economic Study (June 2009).**
Produced by King Sturge.
- **Office Land Use Summary Study (June 2009).**
Produced by King Sturge.
- **Retail Land Use Summary Study (June 2009).**
Produced by King Sturge.
- **Hotel Land Use Summary Study (June 2009).**
Produced by King Sturge.
- **Summary Culture, Destination, Leisure Land Uses Study (June 2009).**
Produced by King Sturge and Locum Consulting.
- **Summary Potential International Convention Centre Study (June 2009).**
Produced by Locum Consulting.
- **Housing Land Use Summary Study (June 2009).**
Prepared by RPS and First Base.
- **Summary Transport Study (June 2009).**
Produced by WSP and Halcrow.
- **Summary of Sustainability Approach (June 2009).**
Produced by Hoare Lea.
- **Summary Infrastructure and Waste Study (June 2009).**
Produced by Hoare Lea, Arup and WSP Environmental Ltd.

Capital & Counties on behalf of Earls Court and Olympia Group

EARLS COURT REGENERATION AREA CORE STRATEGY EVIDENCE BASE RETAIL LAND USE SUMMARY STUDY

JUNE 2009

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EARLS COURT REGENERATION AREA: RETAIL STUDY

1 KEY POINT SUMMARY

- 1.1. This evidence supports the provision of **between approximately 40,000 and 55,000 m²** of new retail floorspace within the Earls Court-Regeneration Area. This would comprise a mix of A1 (comparison and convenience retail), A3 (restaurants and cafés), A4 (drinking establishments) and A5 (hot food take-aways) use classes.
- 1.2. Approximate breakdown parameters of this (gross) floorspace, subject to Masterplanning refinement, are:
 - Convenience Goods Floorspace 5,000 – 10,000 m²
 - Comparison Goods Floorspace 20,000 – 30,000 m²
 - A3/A4/A5 Floorspace 12,000 – 20,000 m²
- 1.3. The retail proposition would be largely serving the proposed new residential and office development (i.e. local needs, as opposed to destination within a wider catchment area). The evidence shows that the new housing and office stock would provide sufficient consumer demand and spend to support the quantum of retail floorspace proposed.
- 1.4. There will also be additional retail expenditure streams over and above the core residential and worker base. These would be both internally-generated from hotels and conferencing facilities, as well as 'spin off' expenditure from visitors to the destination Leisure proposition.
- 1.5. Independent of the need generated by the proposals for the Earls Court Regeneration Area, there is a strong case for new retail floorspace in the area over a long term period (to 2026). This 'latent' need is in addition to the need generated by the proposed Earls Court Regeneration Area. Retail studies¹ produced by Experian for the GLA, Nathaniel Lichfield for RBKC and GVA Grimley for LBHF all highlight substantial need for new retail floorspace (convenience and comparison) in the future.
- 1.6. Although the level of floorspace varies slightly between the studies, the quantum proposed for the Earls Court Regeneration Area sits comfortably within the parameters of each study. This suggests that any new retail floorspace will have limited impact on other centres in the two Boroughs, as there is sufficient 'latent' capacity to comfortably absorb this level of new retail provision, over and above any new demand that will arise from the increased supply in new offices and housing stock within the Earls Court Regeneration Area.
- 1.7. This also suggests that any negative impact on other centres in the area would be minimal. Indeed, the impact on these centres should be positive, in that the increased population of the Regeneration Area will bring holistic benefits of higher spend levels to the wider Boroughs.

¹<http://www.london.gov.uk/mayor/publications/2009/03/consumer-expenditure.jsp>
http://www.london.gov.uk/mayor/planning/docs/convenience_goods_report.pdf
http://www.rbkc.gov.uk/Planning/general/retail_leisure_needs_fullreport.pdf
http://www.lbhf.gov.uk/Images/Exec.Summary%20&%20Main%20Report_tcm21-82325.pdf

2 INTRODUCTION

- 2.1. This study has been prepared for Capital & Counties on behalf of Earls Court & Olympia Group as an evidence base for the Core Strategy submissions for the Earls Court Regeneration Area for the RBKC and LBHF Core Strategies.
- 2.2. The methodology employed has been to review relevant Council commissioned retail studies and to utilise these and Experian derived datasets to assess current and forecast retail expenditure in RBKC and LBHF. An assessment is then made of the additional demand for convenience and comparison goods retail floorspace forming part of the Earls Court Regeneration Area having regard to the new resident population and the number of people who would work in the area and taking into account existing retail facilities in the two Boroughs. Finally an assessment is made of the scale of Use Class A3-A5, on the basis of national floorspace data and an analysis of other comparable mixed use locations.

3 CONTEXT

- 3.1. Planning Policy Statement 1 – Delivering Sustainable Development, states that the Government is committed to developing and supporting successful, thriving, safer and inclusive communities. Planning Policy Statement 6 – Planning for Town Centres, confirms the Government's intention by stating that one of its objectives is to deliver more sustainable patterns of development, ensuring that locations are fully exploited through high-density, mixed-use development and promoting sustainable transport choices, including reducing the need to travel and providing alternatives to car use.
- 3.2. The Earls Court Road area is designated as a Local Centre in the adopted Unitary Development Plan (UDP). However, the RBKC draft Core Strategy identifies the provision as of District Centre status, in line with the London Plan.
- 3.3. There are 11 main shopping centres in RBKC, including one International (Knightsbridge), two Major (Kings Road East, High Street Kensington), six District (Earls Court Road area, Notting Hill Gate, Fulham Road East, Fulham Road West, Kings Road West, South Kensington) and two Special District Centres (Westbourne Grove, Portobello Road). In terms of national hierarchy, Earls Court Road area ranked 562nd in Javelin Group's 2009 Venuescore, making it the fifth most important shopping centre in the Borough (behind Knightsbridge, Kings Road, Kensington High Street and Notting Hill Gate).
- 3.4. The existing provision is predominantly linear in form and takes the form of traditional high street shopping around three key roads – Earls Court Road, Kenway Road and Hogarth Road.
- 3.5. The proposals for new retail floorspace in the Earls Court Regeneration Area refer to the creation of a new retail centre, rather than an adjunct to the existing offer. The new floorspace would be a complementary, rather than competitive, to the existing Earls Court Road proposition. In planning terms, this would see the creation of a new District Centre, rather than an enlargement of the existing one.
- 3.6. The Earls Court Regeneration Area also lies within LBHF. The UDP for LBHF highlights three town centres, namely Hammersmith, Fulham and Shepherd's Bush. According to the London Plan, the former two are classified as Major Centres, while Shepherds Bush is a District Centre. In addition to these, the UDP identifies a further 19 key local shopping centres and a number of smaller shopping parades and individual shops.
- 3.7. In June 2009, LBHF published the Core Strategy Options 2009 document. Preferred Option C1 of this document states that Shepherd's Bush town centre should be designated as a Metropolitan Centre in the London Plan due to its increased importance since the opening of Westfield shopping centre in 2008.
- 3.8. In April 2009, the Mayor published a document for consultation with the Assembly entitled 'A new Plan for London – Proposals for the Mayor's London Plan'. Within this document, the Mayor proposes to review the existing town centre classifications and provide a broad indication for each of future growth, although it does not give any indication of which centres are likely to be re-designated.
- 3.9. As the Earls Court Regeneration Area straddles both RBKC and LBHF, this analysis focuses on both Boroughs.

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4 REVIEW OF EXISTING RETAIL STUDIES

4.1. As part of the appraisal process, key relevant retail studies have been reviewed. These include:

- 'Consumer Expenditure and Comparison Goods Retail Floorspace Need in London' (March 2009) – Experian for the GLA²
- 'London Town Centre Assessment. Stage 2: Convenience Goods Floorspace Need' (May 2005) – Experian for the GLA³
- 'Royal Borough of Kensington & Chelsea Retail and Leisure Needs Study' (July 2008) – Nathaniel Lichfield and Partners⁴
- 'West London Retail Needs Study 2006: London Boroughs of Ealing, Hounslow and Hammersmith & Fulham' (December 2006) – GVA Grimley⁵

4.2. The following floorspace needs were highlighted by the respective studies:

GLA

Table 1 Gross Comparison Goods Floorspace Requirements (2006–2026) (m²)⁶

	Productivity Growth		
	1.5%	2.2%	2.8%
Hammersmith and Fulham	35,154	22,156	12,410
Kensington and Chelsea	177,885	122,210	80,468
Total	213,039	144,366	92,878

Source: Experian (for the GLA) – March 2009

Table 2 Gross Convenience Goods Floorspace Requirements to 2016 (m²)

	Productivity Growth		
	0.15%	0.50%	1.00%
<i>Low Sales Density Scenario (£5,500/m²)</i>			
Hammersmith and Fulham	9,800	6,620	2,374
Kensington and Chelsea	14,449	10,493	5,210
Total	24,249	17,113	7,584
<i>High Sales Density Scenario (£9,400/m²)</i>			
Hammersmith and Fulham	5,734	3,873	1,389
Kensington and Chelsea	8,454	6,139	3,048
Total	14,188	10,012	4,437

Source: Experian (for the GLA) – May 2005. NB Study only provides forecasts to 2016

² <http://www.london.gov.uk/mayor/publications/2009/03/consumer-expenditure.jsp>

³ http://www.london.gov.uk/mayor/planning/docs/convenience_goods_report.pdf

⁴ http://www.rbkc.gov.uk/Planning/general/retail_leisure_needs_fullreport.pdf

⁵ http://www.lbhf.gov.uk/Images/Exec.Summary%20&%20Main%20Report_tcm21-82325.pdf

⁶ Timeline scenario, fixed productivity growth, assumes centre specific capacity for additional developments.

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RBKC

Table 3 RBKC Comparison Expenditure/Floorspace Projections

	2008-2012	2008-2015	2008-2020	2008-2028
<i>High Growth Scenario</i>				
Surplus Expenditure (£m)	164.11	295.31	582.48	1,180.99
Projected Sales Floorspace - GROSS (m ²)	32,053	55,164	100,993	181,668
Projected Sales Floorspace - NET (m ²)	24,040	41,373	75,744	136,251
<i>Low Growth Scenario</i>				
Surplus Expenditure (£m)	31.19	146.95	403.95	943.67
Projected Sales Floorspace - GROSS (m ²)	5,932	27,277	69,712	144,881
Projected Sales Floorspace - NET (m ²)	4,449	20,458	52,284	108,661

Source: Nathaniel Lichfield and Partners (for RBKC) – July 2008

NB The High Growth Scenario assumes constant market shares between 2008 and 2028 i.e. no impact or trade diversion to Westfield or other developments. The Low Growth Scenario assumes adjusted market shares i.e. it takes into account other developments.

Table 4 RBKC Convenience Expenditure/Floorspace Projections

	2008-2012	2008-2015	2008-2020	2008-2028
<i>High Growth Scenario</i>				
Surplus Expenditure (£m)	85.50	100.84	124.53	147.47
Projected Sales Floorspace - GROSS (m ²)	11,072	13,404	16,898	19,936
Projected Sales Floorspace - NET (m ²)	7,751	9,383	11,829	13,955
<i>Low Growth Scenario</i>				
Surplus Expenditure (£m)	27.83	42.65	65.46	86.97
Projected Sales Floorspace - GROSS (m ²)	3,091	5,181	8,311	11,027
Projected Sales Floorspace - NET (m ²)	2,164	3,627	5,818	7,719

Source: Nathaniel Lichfield and Partners (for RBKC) – July 2008

NB The High Growth Scenario assumes that foodstores (net sales area >200 m²) will have an average sales density of around £11,000/m² at 2008 (inflated by 0.3% per annum up to 2020). The Low Growth Scenario assumes a figure 20% lower.

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LBHF

Table 5 LBHF Future Comparison Goods Floorspace Capacity (2006 base) (m²)

	2011	2016	2021
Future Capacity (m ² net)	14,531	30,799	49,972

Source: GVA Grimley (for LBs of Ealing, Hounslow and Hammersmith & Fulham) – December 2006.

NB Figures assume a 4.3% growth rate and 2% sales efficiency. Study only provides forecasts to 2021.

Table 6 LBHF Future Convenience Goods Floorspace Capacity (2006 base) (m²)

	2011		2016		2021	
	£4,000/m ²	£12,000/m ²	£4,000/m ²	£12,000/m ²	£4,000/m ²	£12,000/m ²
Future Capacity (m ² net)	10,966	3,655	15,754	5,251	20,945	6,982

Source: GVA Grimley (for LBs of Ealing, Hounslow and Hammersmith & Fulham) – December 2006

NB Figures assume a 0.7% growth rate and 0% sales efficiency. Study only provides forecasts to 2021

- 4.3. All four studies use common datasets (eg Experian's GOAD system and Retail Planner expenditure data). Therefore the floorspace need figures are broadly consistent. However, there are some differences because of contrasting methodologies and assumptions (eg sales densities and productivity growth rates), different vintages of the data and varying forecast timeframes.
- 4.4. Our assessment is based on the most up-to-date figures available at the current time. The Experian Comparison Goods report for the GLA is the most recent (published in March 2009) and is therefore likely to comprise the most current data. For example, the projected growth rates for comparison goods have been revised down to reflect the downturn in the UK economy (to 4.3% per annum rather than 4.8% previously). It also seeks to take into account retail trading patterns on a London wide basis, including adequate provision for Special Forms of Trading (SFT). SFT encompasses all spending that does not go through store-based channels, such as Internet-based shopping, traditional mail order, market stalls and door-to-door salesmen.
- 4.5. Even without taking into account 'indigenous' demand, there is sufficient 'latent' demand to absorb the proposed Earls Court Regeneration Area retail land use. It is important to stress that all four of the retail studies reviewed do not take into account the proposed re-development of the Earls Court Regeneration Area, so will not make allowance for the additional need/spending that would arise from the proposed increases in office and residential floorspace. There is a key difference between 'latent' and 'indigenous' demand, with the retail floorspace at the Earls Court Regeneration Area predominantly absorbing the latter.

5 EXISTING FLOORSPACE PROVISION

5.1 Existing retail floorspace in the two Boroughs is clustered around 25 centres. These include one recognised 'International Centre' (Knightsbridge) and a mix of 'Major', 'District' and 'Neighbourhood' Centres, the largest of which are Kings Road and Kensington High Street in RBKC, and Hammersmith, Shepherd's Bush and Fulham Road in LBHF.

Table 7 Retail Floorspace by Borough 2009 (gross m²)

	RBKC	LBHF	Total
Comparison Goods (m ²)	342,499	92,225	434,724
Convenience Goods (m ²)	50,749	31,078	81,827
Retail Service (m ²)	37,061	27,653	64,714
Total Retail Floorspace (m²)	430,309	150,956	581,265

Source: Experian GOAD, March 2009

- 5.2. The key omission from these figures is Westfield London, which opened in October 2008. At around 150,000 m², the scheme in White City has virtually doubled the level of retail floorspace provision in LBHF.
- 5.3. Experian's floorspace requirements figures do factor in Westfield London (as well as other major pipeline schemes such as Stratford City, Elephant and Castle and Battersea Power Station). The figures calculated for floorspace need are therefore additional to Westfield London and the other proposed retail developments.

6 CURRENT AND FORECAST RESIDENTIAL, INFLOW AND TOURIST SPEND

- 6.1. According to the latest expenditure figures from Experian (provided in May 2009), total available residential-based retail expenditure (comparison and convenience goods) totalled £1,636m across the two Boroughs in 2006. Applying population and econometric forecasts, this figure is predicted to grow by 87% to £3,052m by 2026.

Table 8 Available Residential Spend by Borough 2006 and 2026

	RBKC		LBHF	
	2006	2026	2006	2026
Comparison Goods (£m)	578.6	1,222.9	509.2	1,125.4
Convenience Goods (£m)	285.0	357.8	262.8	345.8
Total (£m)	863.6	1,580.7	772.0	1,471.2

Source: Experian, King Sturge

- 6.2. These figures are useful in quantifying the level of available spend and underlining the forecast rate of growth over a long timeframe. However, they do not fully reflect actual expenditure flows – in other words, where that spend is physically made. Nor do they factor in non-residential spend.
- 6.3. Figures from Experian’s GLA reports take this a stage further and are more reflective of actual expenditure in-flows and out-flows. Using gravity models derived from real customer data (from their ‘Where Britain Shops’ survey), Experian allocate all residential spend to the centres where it is made, thereby reflecting actual shopping patterns. Important layers of additional data are also factored in, such as commuter and tourist/visitor spend (Table 9) and Special Forms of Trading (SFT).

Table 9 Allocated Comparison Goods Spend by Borough 2006 and 2026

	RBKC		LBHF	
	2006	2026	2006	2026
London-based Spend (£m)*	780.0	1,213.9	475.4	2,669.9
Commuter Spend (£m)**	71.6	104.6	16.1	108.1
Tourist Spend (£m)	239.9	579.6	49.8	95.8
Total (£m)	1,091.4	1,898.1	541.3	2,873.8

Source: Experian, March 2009

* ‘London-based Spend’ refers to spend from within Greater London, and comprises both retained spend (from RBKC and LBHF) and spend in-flows from other London Boroughs

** ‘Commuter Spend’ refers to spend generated from workers in London, who live outside the capital.

- 6.4. Note that these figures are indicative only of ‘latent’ demand. They were prepared independently of the potential Earls Court Regeneration Area and do not factor in the retail land use proposals made in this representation.
- 6.5. However, the figures do take into account large-scale consented retail schemes and model expenditure flows accordingly. This accounts for the fivefold increase in attracted comparison goods spend between 2006 and 2026 in LBHF, principally on account of the opening of Westfield London.

7 ADDITIONAL FUTURE RESIDENTIAL 'INDIGENOUS' CONSUMER DEMAND

- 7.1. An indicative residential land use budget is proposed for the Earls Court Regeneration Area of between approximately 9,000 – 10,000 new housing units. At the last census (2001), housing units were occupied by an average of 2.3 people across London. This would therefore increase local residential population by 20,700 – 23,000.
- 7.2. According to Experian data, per capita comparison and convenience goods in 2006 were £3,111 and £1,587 respectively for London as a whole. These figures are forecast to rise to £6,528 and £1,937 by 2026. There are considerable variations between individual Boroughs. The figures for RBKC are 10-20% higher than LBHF, although both Borough are significantly above the London average.
- 7.3. In Table 10, we analyse four scenarios, based on 'low versus high' options on two variables. The first variable relates to levels of new housing provision, with 'low' relating to 9,000 units and 'high' to 10,000. The second variable refers to ranges of per capita spend ratios. To this end, we use data for LBHF as the 'lower case' scenario and data for RBKC as the 'higher case'.

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Table 10 New Residential Expenditure Forecasts

	Lower Range Provision	Higher Range Provision
Residential Units	9,000	10,000
New Population	20,700	23,000
<i>Lower Case Scenario (LBHF metrics)</i>		
Convenience Spend per Capita 2026 (£ at 2003 prices)	1,943	
Comparison Spend per Capita 2026 (£ at 2003 prices)	6,981	
Total Convenience Spend (£)	40,220,100	44,689,000
Total Comparison Spend (£)	144,506,700	160,563,000
<i>Higher Case Scenario (RBKC metrics)</i>		
Convenience Spend per Capita 2026 (£ at 2003 prices)	2,211	
Comparison Spend per Capita 2026 (£ at 2003 prices)	8,342	
Total Convenience Spend (£m)	45,767,700	50,853,000
Total Comparison Spend (£m)	172,679,400	191,866,000

Source: Experian, King Sturge, June 2009

- 7.4. The figures in Table 10 refer to total new spend, not all of which will be captured within the proposed retail proposition of the Earls Court Regeneration Area. A proportion will be retained in the immediate area, whilst the remainder will gravitate to other centres within and outside the two Boroughs. Existing centres will therefore benefit from increased spend in the wider area generated by new development in the EC Regeneration Area.
- 7.5. In general, shopping patterns in convenience goods are more localised and therefore 'retention rates' are much higher. In comparison goods, patterns are more fragmented, reflecting consumers' greater propensity to travel according to their non-food shopping needs.
- 7.6. Based on our experience of observed shopping dynamics in other comparable locations, we have assumed that 90% of residence-based convenience goods spend and 30% of comparison goods spend will be retained on site. We believe that these estimates are reasonable, possibly erring on the conservative side. By extension, the floorspace need figures that we derive from them are likely to be robust, rather than over-stated.

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Table 11 Retained New Residential 'Indigenous' Demand

	Lower Range Provision	Higher Range Provision
Residential Units	9,000	10,000
New Population	20,700	23,000
<i>Lower Case Scenario (LBHF metrics)</i>		
Total Convenience Spend (£)	40,220,100	44,689,000
Total Comparison Spend (£)	144,506,700	160,563,000
Retained Convenience Spend (£)	36,198,090	40,220,100
Retained Comparison Spend (£)	43,352,010	48,168,900
<i>Higher Case Scenario (RBKC metrics)</i>		
Total Convenience Spend (£m)	45,767,700	50,853,000
Total Comparison Spend (£m)	172,679,400	191,866,000
Retained Convenience Spend (£)	41,190,930	45,767,700
Retained Comparison Spend (£)	51,803,820	57,559,800

Source: Experian, King Sturge, June 2009

- 7.7. In Table 11, we estimate that new retail floorspace at the Earls Court Regeneration Area site would service between £36.2m and £45.8m of new 'indigenous' convenience goods spend and £43.4m and £57.6m comparison goods spend from the new residential population alone. These figures are based on 'retention rates' of 90% for convenience and 30% for comparison goods, across the four scenarios outlined previously.

8 ADDITIONAL FUTURE NON-RESIDENTIAL CONSUMER DEMAND

- 8.1. The Earls Court Regeneration Area indicative land use budget also includes the provision of 400,000 to 550,000 m² of new office use within the wider EC Regeneration Area. Employment density metrics produced by Ramidus Consulting Ltd and Roger Tym & Partners for the GLA in ‘The London Office Policy Review 2007’ report⁷ suggest that there is an average of 175 ft² (16.3 m²) office space per employee in the capital. This would therefore translate to new office population of 24,500 – 33,700.
- 8.2. Again, we have analysed four different scenarios (Table 12), based on the parameters of new office floorspace (‘low’ = 400,000 m², ‘high’ = 550,000) and varying per capita spend figures (‘low’ = LBHF, ‘high’ = RBKC).

Table 12 New Office Worker Expenditure Forecasts

	Lower Range Provision	Higher Range Provision
New Office Floorspace (m ²)	400,000	550,000
Worker Population	24,540	33,742
<i>Lower Case Scenario (LBHF metrics)</i>		
Convenience Spend per Capita 2026 (£ at 2003 prices)	1,943	
Comparison Spend per Capita 2026 (£ at 2003 prices)	6,981	
Total Convenience Spend 2026 (£)	47,680,982	65,561,350
Total Comparison Spend 2026 (£)	171,312,883	235,555,215
<i>Higher Case Scenario (RBKC metrics)</i>		
Convenience Spend per Capita 2026 (£ at 2003 prices)	2,211	
Comparison Spend per Capita 2026 (£ at 2003 prices)	8,342	
Total Convenience Spend 2026 (£m)	54,257,669	74,604,294
Total Comparison Spend 2026 (£m)	204,711,656	281,478,528

Source: Experian, King Sturge, June 2009

- 8.3. Applying the same Experian per capita data used in the ‘Indigenous’ Residential calculations provides a range of figures of total available expenditure. However, lower retention rates are applied, reflecting the difference in commuter- and residential-based spending patterns.

⁷ <http://www.london.gov.uk/mayor/planning/docs/lopr-07.pdf>

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- 8.4. The assumed 'retention rate' for office-based convenience goods spend is 10% (the converse of the 90% assumed for residential population). The assumed 'retention rate' for office-based comparison goods spend is just 5%. This reflects worker-based shopping patterns, which tend to revolve around lunchtime/after-work browsing, rather than destination-based trips. Actual comparison goods spend made close to the workplace is only a fraction of their overall weekly comparison goods spend, hence our conservative estimates.

Table 13 Retained New Office Worker Demand

	Lower Range Provision	Higher Range Provision
New Office Floorspace (m ²)	400,000	550,000
Worker Population	24,540	33,742
<i>Lower Case Scenario (LBHF metrics)</i>		
Total Convenience Spend 2026 (£)	47,680,982	65,561,350
Total Comparison Spend 2026 (£)	171,312,883	235,555,215
Retained Convenience Spend 2026 (£)	4,768,098	6,556,135
Retained Comparison Spend 2026 (£)	8,565,644	11,777,761
<i>Higher Case Scenario (RBKC metrics)</i>		
Total Convenience Spend 2026 (£m)	54,257,669	74,604,294
Total Comparison Spend 2026 (£m)	204,711,656	281,478,528
Retained Convenience Spend 2026 (£)	5,425,767	7,460,429
Retained Comparison Spend 2026 (£)	10,235,583	14,073,926

Source: Experian, King Sturge, June 2009

- 8.5. In Table 13, we estimate that new retail floorspace at the Earls Court Regeneration Area would service between £4.8m and £7.5m of new indigenously generated convenience goods spend and £8.6m and £14.1m comparison goods spend from the new office worker base. These figures are based on 'retention rates' of 10% for convenience and 5% for comparison goods, across the four scenarios outlined previously.

9 'INDIGENOUS' EXPENDITURE SURPLUS AND FLOORSPACE NEED

- 9.1. There are additional internally-generated expenditure streams that would also support the proposed retail floorspace, over and above the new residential and office worker base. These include additional spend that will arise from visitors to the hotels and possible international conference centre (ICC), as well as 'spin-off- spend' from the destination leisure attractions.
- 9.2. Estimating expenditure streams from these uses has its limitations – to do so may undermine the robustness of the other 'indigenous' spend flows from the new housing and office space. However, it is clear that the hotels, destination, cultural, leisure (and possibly conference facilities) will bring additional spend to the retail floorspace and therefore any estimates we have derived on "indigenous' floorspace need are likely to be on the conservative side.
- 9.3. Aggregating retained new residential and worker spend provides a figure for total 'indigenous' demand (Table 14). Four scenarios are analysed, covering 'lower range provision' (9,000 new homes and 400,000 m² of office floorspace) and 'higher range provision' (10,000 new homes and 550,000 m² of office floorspace), set against two figures for per capita spend ('low' relating to LBHF, 'high' to RBKC).
- 9.4. Under the various scenarios, the indicative range for convenience goods is £40.9m - £53.2m. For comparison goods it is £51.9m - £71.6m.

Table 14 Total 'Indigenous' Expenditure Surplus 2026

	Lower Range Provision	Higher Range Provision
Residential Units	9,000	10,000
New Office Floorspace (m ²)	400,000	550,000
<i>Lower Case Scenario (LBHF metrics)</i>		
Retained Resi Convenience Spend (£)	36,198,090	40,220,100
Retained Worker Convenience Spend (£)	4,768,098	6,556,135
Total Retained Convenience Spend (£)	40,966,188	46,776,235
Retained Resi Comparison Spend (£)	43,352,010	48,168,900
Retained Worker Comparison Spend (£)	8,565,644	11,777,761
Total Retained Comparison Spend (£)	51,917,654	59,946,661
<i>Higher Case Scenario (RBKC metrics)</i>		
Retained Resi Convenience Spend (£)	41,190,930	45,767,700
Retained Worker Convenience Spend (£)	5,425,767	7,460,429
Total Retained Convenience Spend (£)	46,616,697	53,228,129
Retained Resi Comparison Spend (£)	51,803,820	57,559,800
Retained Worker Comparison Spend (£)	10,235,583	14,073,926
Total Retained Comparison Spend (£)	62,039,403	71,633,726

Source: Experian, King Sturge, June 2009

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- 9.5. Converting these surplus figures to actual floorspace depends upon the anticipated level of floorspace productivity. In view of this, we provide a number of scenarios, based upon varying levels of sales density achieved by any new floorspace. These are:
- Comparison goods - £3,300/m² - £5,300/m² (NET)
 - Convenience goods - £5,900/m² - £12,900/m² (NET)
- 9.6. These figures are designed to reflect a potential mix of retail uses. In convenience goods, grocery specialists (eg bakers, butchers, greengrocers) tend to achieve low sales densities of around £3,500/m²⁸, whilst an efficient superstore (>2,500m²) operated by one of the leading multiples (eg Tesco, Sainsbury's, Asda, Morrisons) is likely to trade at an average of around £12,000/m².
- 9.7. As the convenience offer is unlikely to comprise purely grocery specialists, we have adopted £5,900/m² as the 'low' sales density scenario. The 'high' sales density scenario of £12,900/m² reflects productivity levels at a high performing grocery superstore. The 'medium' scenario is the mid-point between the two (£9,400/m²).
- 9.8. In comparison goods, the range may be even broader, particularly between retail sub-sectors (eg DIY retailers versus jewellers). Figures from Verdict Research⁹ suggest that average high street sales densities are around £4,300/m² and we have therefore used this as a 'mid case' scenario. Around this, we have also provided a 'low' case scenario (sales density of £3,300/m²) and 'high' case scenario (sales density of £5,300/m²).
- 9.9. Note that the sales density figures from Verdict refer to net sales area, whereas our figures relate to gross external area. The sales density figures have therefore been adjusted from net to gross using our standard parameter of 70% (i.e. net floorspace relates to 70% of gross floorspace). The sales density figures applied in our calculations are therefore:
- Comparison goods - £2,310/m² - £3,710/m² (GROSS)
 - Convenience goods - £4,130/m² - £9,030/m² (GROSS)
- 9.10. Floorspace need is assessed in Tables 15 and 16, with the three sales density scenarios set against three spend scenarios (derived in Table 14). In the spend scenarios, 'low' refers to low provision (9,000 homes, 400,000 m² office space) and LBHF per capita spend metrics, 'high' to high provision (10,000 homes, 550,000 m² office space) and RBKC per capita spend metrics. It is reasonable to assume that the expenditure of residents living within the Earls Court Regeneration Area will fall within this range.

⁸ Verdict – 'UK Food & Grocery Retailers 2009' – published April 2009

⁹ Verdict - 'UK Town Centre Retailing 2008' – published September 2008

Table 15 Total Convenience ‘Indigenous’ Gross Floorspace Need 2026

	Convenience Spend Surplus (£)	Floorspace Density		
		Low (£4,130/m ²)	Medium (£6,580/m ²)	High (£9,030/m ²)
- Low	40,966,188	9,919	6,226	4,537
- Medium	47,097,159	11,404	7,158	5,216
- High	53,228,129	12,888	8,089	5,895

Source: Experian, King Sturge, June 2009

Table 16 Total Comparison ‘Indigenous’ Gross Floorspace Need 2026

	Comparison Spend Surplus (£)	Floorspace Density		
		Low (£2,310/m ²)	Medium (£3,010/m ²)	High (£3,710/m ²)
- Low	51,917,654	22,475	17,248	13,994
- Medium	61,775,690	26,743	20,523	16,651
- High	71,633,726	31,010	23,799	19,308

Source: Experian, King Sturge, June 2009

- 9.11. These figures form the basis of our approximate floorspace breakdown parameters of 5,000 – 10,000 m² for convenience goods and 20,000 – 30,000 m² for comparison goods. Note that these parameter figures are gross.
- 9.12. In convenience goods, the evidence shows that ‘indigenous’ spend will comfortably support the level of floorspace proposed. Eight of the nine scenarios indicate need of more than 5,000 m² (gross). Indeed, two of the scenarios (low density/medium and high spend surplus) point to possible need of more than 10,000 m².
- 9.13. Only in the most extreme negative scenario (i.e. low spend surplus, high floorspace productivity) is there a shortfall in ‘indigenous’ spend to the level of floorspace proposed. Even then, the gap is only relatively small – 463 m², equating to ‘non’ indigenous spend of just £4m at that level of sales density.
- 9.14. In comparison goods, the situation is slightly more complex. The range of scenarios highlight need of between 14,000 and 31,000 m². An approximate range of 20,000 – 30,000 m² (gross) comparison goods floorspace is proposed within this range. This is endorsed by four scenarios. One scenario is only marginally short of these parameters (19,300 m²), whilst one suggests surplus demand for more than 30,000 m².
- 9.15. Only in the ‘high density’ scenarios is there any degree of shortfall i.e. floorspace need is also dependent on some spend from outside the Earls Court Regeneration Area. This is unlikely to have an adverse effect on other centres in the two Boroughs (including existing provision in the Earls Court Road and Fulham/North End Road areas). These centres are likely to benefit from expenditure out-flow from the expanded residential and worker base of the Earls Court Regeneration Area. It is assumed that 70% of all new comparison goods spend will gravitate out of the Earls Court Regeneration Area to surrounding centres.

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- 9.16. To put this into perspective, the high sales density scenarios require around £74m of spend to achieve the gross parameters recommended (20,000 – 30,000 m²). This would represent an additional £22m to the 'worst case' surplus spend projections from the 'indigenous' population. This £22m would equate to around 1.1% of all comparison goods spend made in RBKC in 2026 and 0.8% made in LBHF (Table 9), or 0.5% across both Boroughs.
- 9.17. Although the scale of comparison goods floorspace proposed could draw in some spend from outside the 'indigenous' market, the proportion is likely to be relatively small. In essence, therefore, this is unlikely to have a significant detrimental effect on other centres in the two Boroughs.

10 A3/A4/A5 FLOORSPACE NEED

- 10.1. Although A3/A4/A5 uses fall under the broad umbrella of retail, there is no standardised, expenditure-based appraisal process of floorspace need for restaurants, cafés and bars. Assessment of potential provision is therefore based upon common practice of comparison with London-wide averages and benchmarking against appropriate peer schemes.
- 10.2. As with the A1 uses, there will be sufficient indigenous demand for A3/A4/A5 provision. The floorspace will service the needs of the local worker and residential population, the vast majority of which will be constituted by the new office and housing stock. Equally, A3/A4/A5 provision will be an important factor in cementing the site's mixed-use credentials and creating 'out-of-hours' entertainment and footfall.
- 10.3. For the purposes of this analysis, A3/A4/A5 uses cover five GOAD definitions – Restaurants, Cafés, Fast Food & Takeaways, Public Houses and Bars & Wine Bars.
- 10.4. Taking GOAD data for all London centres identified in the Experian GLA study, the average retail: A3/A4/A5 floorspace split is around 77:23. Expressed another way, A3/A4/A5 uses account for an average of around 23% of all combined retail floorspace across all London centres. This figure is an average, including the full mix of 'Major', 'District and 'Neighbourhood' centres.
- 10.5. Most relevant to the proposal in question are other urban locations with high levels of complementary office and/or residential floorspace. In a number of these locations, the A3/A4/A5 share of floorspace exceeds 50% - in other words, there is more provision of A3/A4/A5 than 'traditional' retail floorspace (comprising comparison and convenience goods). Key examples with higher-than-average A3/A4/A5 provision include major workplace centres such as Bank, The City, Kings Cross, Victoria and London Bridge.

Table 17 Breakdown of Floorspace (gross m²) in Selected London Centres

Goad Centre	Retail Floorspace (m²)	A3/A4/A5 Floorspace (m²)	Total Retail & A3/A4/A5 Floorspace (m²)	A3/A4/A5 as % of Total
Shoreditch	12,827	19,703	32,530	61%
Kings Cross	5,930	6,765	12,696	53%
Bank	13,601	14,382	27,983	51%
Paddington	10,095	10,047	20,142	50%
Greenwich	12,543	10,299	22,843	45%
London City	165,838	127,357	293,195	43%
London Bridge	30,098	17,539	47,638	37%
Victoria Street	54,695	25,951	80,645	32%
Canary Wharf	59,087	26,846	85,933	31%

Source: Experian GOAD, King Sturge, March 2009

NB Figures relate to the parameters of the GOAD plan, in some cases modified for consistency with GLA definitions.

- 10.6. Many of the centres identified as having higher-than-average proportions of A3/A4/A5 floorspace are established or emerging 'Urban Quarters' – Canary Wharf, Greenwich, Paddington, Kings Cross. As a general rule, new Urban Quarters tend to allocate increasing proportions of floorspace to A3/A4/A5 use, in growing recognition of their value in creating sustainable residential and office communities.
- 10.7. On this basis, we would anticipate that there would be a need for a minimum of 30% of the total retail floorspace at the wider site be devoted to A3/A4/A5 use classes. At the lower end of the proposal (40,000 m²), this would equate to around 12,000 m². Potentially, this proportion could rise to as much as 50%, depending on the scale and mix of the remainder of the Leisure proposition.
- 10.8. We have excluded A2 (financial and professional services) uses from our analysis of capacity. However, it is reasonable to assume that there will also be some provision of A2 floorspace (especially banks) within the wider definition of retail floorspace. As 'non-A1' floorspace, this is likely to fall under the same umbrella as A3/A4/A5 uses.
- 10.9. Subject to further assessment and Masterplanning, we would anticipate that between 12,000 m² and 20,000 m² of A3/A4/A5 (plus A2) floorspace would be an appropriate quantum for an 'Urban Quarter' of the size proposed.

11 CONCLUSION

- 11.1. Retail (by definition, including A2/A3/A4/A5 uses) would be a an important component in the re-development of the Earls Court Regeneration Area. Although less significant in terms of quantum of floorspace than offices and residential, retail will reinforce the location's status as a complementary/synergistic mixed-use Urban Quarter.
- 11.2. The retail uses would be positioned to be local to the Earls Court Regeneration Area, rather than destination-driven. In this respect, it is essential to distinguish between 'latent' (i.e. that already exists independently of the EC Regeneration Area) and 'indigenous' demand (i.e that would be created directly as a result of increased residential and office infrastructure within the EC Regeneration Area).
- 11.3. The King Sturge research suggests that 'indigenous' demand would contribute considerably to supporting the quantum of new retail floorspace proposed (40,000 – 55,000 m² gross). By extension, King Sturge believe that this level of floorspace could be accommodated into the wider site with limited negative impact on the surrounding centres.
- 11.4. There is likely to be some expenditure inflow from outside Earls Court Regeneration Area (particularly in comparison goods), but this will be counter-balanced by some out-flow from residents in the new scheme. In other words, the new 'indigenous' population will also shop in areas outside the Earls Court Regeneration Area, including other centres in RBKC and LBHF.
- 11.5. The Masterplanning and planning application process will examine retail provision and potential impact in more detail.
- 11.6. The evidence in this summary study is reinforced by other retail studies of 'latent' demand, which show that RBKC and LBHF have the capacity to support substantial volumes of retail floorspace over a long-term time horizon (to 2026). In other words, even disregarding the rest of the proposals for the Earls Court Regeneration Area, there is ostensibly sufficient 'latent' demand to support the quantum of floorspace proposed.
- 11.7. Taken in isolation from each other, 'latent' and 'indigenous' demand support the quantum of retail floorspace proposed. Taken in unison, the support and requirement is all the stronger.

King Sturge LLP
June 2009

Capital & Counties on behalf of Earls Court and Olympia Group

**EARLS COURT REGENERATION AREA
CORE STRATEGY EVIDENCE BASE
SUMMARY CULTURAL, LEISURE AND
DESTINATION LAND USES STUDY**

JUNE 2009

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EARLS COURT REGENERATION AREA: LEISURE STUDY

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EARLS COURT REGENERATION AREA: LEISURE STUDY

1. KEY POINT SUMMARY

- 1.1. The Earls Court Regeneration Area strategic site allocation proposals include an indicative land use budget of between 18,000m² and 27,000m² of new commercial leisure floorspace and 36,000m² and 45,000m² of destination venue floorspace. These land uses are considered key to creating a sustainable mixed use community.
- 1.2. "Cultural" and "Leisure" uses include a range of Class D uses, including, for example, cinemas, bowling, night clubs, health and fitness and other sports and leisure uses. "Destination Venue" uses comprise uses which have the potential to create a destination draw and sense of place to the Earls Court Regeneration Area.
- 1.3. There is a significant quantum of existing D1, D2, B1 and associated and ancillary uses within the Regeneration Area, principally at the Exhibition Centres. As such any future cultural, leisure and destination uses incorporated in the masterplan process should be seen as a substitution rather than an untested addition to the area.
- 1.4. In terms of destination, Earls Court already has an established brand, which is a major asset. It is a well known location, with positive attributes and associations, existing activity and strong connectivity. It is a natural fit with the existing brand, reputation and Exhibition Centre and related uses to have a significant amount of leisure, cultural and Destination Venue floorspace in the Regeneration Area. In terms of brand, competing destinations spend millions of pounds to achieve lesser levels of recognition, so the advanced starting point of the Regeneration Area provides a real benefit and attraction.
- 1.5. There are challenges which need to be met for Destination Venues, particularly in relation to capital and revenue funding. Destination Venues need to be well planned and significant attention paid to viability, including learning lessons from other Destination Venues which have not succeeded. Flexibility in terms of offer and operation is desirable. A number of areas require assessment including (i) capital cost and revenue risk, (ii) fixed versus programmed events/attractions, and (iii) static versus active participation. A flexible approach in a strategic site allocation is key to allow appropriate masterplanning to take place. High quality public realm working well with Destination Venues is also important to create a strong sense of place.
- 1.6. The mix of cultural, destination and leisure uses helps create a destination and draw, for example, restaurant and bar operators, as well as making it an attractive place for residents and office workers. For example, health and fitness clubs, cinemas etc. have a positive effect on the development as a whole, by creating a place people want to live, work and play in. In general, commercial leisure facilities tend to draw the main part of their customer base from residents up to a 20 minutes travel time. Major leisure facilities such as cinemas, ten-pin bowling centres, ice rinks and family entertainment centres often benefit from locating together and creating a leisure offer of scale. The Regeneration Area's strong transport connectivity is also a real asset to support a significant destination, cultural and leisure set of uses. All this helps deliver a mixed use community for the wider regeneration aspirations for the Earls Court Regeneration Area.
- 1.7. There is significant demand for general commercial leisure uses, both existing and new demand created by the development of the Regeneration Area itself. Most new urban quarter developments across London and elsewhere comprise a significant amount of leisure and related floorspace, exemplifying the importance of the uses to a mixed use community and successful creation and sense of place.
- 1.8. Further assessment of the type and mix of destination, cultural and leisure uses will be undertaken as part of the masterplanning process for the Regeneration Area.

2 DESTINATION POTENTIAL OF THE EARLS COURT REGENERATION AREA

What is a "destination"?

- 2.1. For clarity and completeness, it is important to define what is meant by a "destination" in the context of the Earls Court Regeneration Area.
- 2.2. For the purposes of this study, we define "the destination" as the collection of proposed attractors, services and infrastructure within the Earls Court Regeneration Area that are commonly united by a single brand and together define the visitor experience. In this context, "the South Bank", "Covent Garden", and "the Barbican" can all be considered destinations.
- 2.3. We use the term "Destination Venue" to describe individual attractions that help to catalyse the creation of a new destination, either by directly motivating a significant volume of visits in their own right, or by creating awareness and profile and by underpinning the brand by which the destination is known. For example, in this respect, Tate Modern, the London Eye and the South Bank Centre are all important Destination Venues of the South Bank. Similarly, the covered market, London Transport Museum and the Royal Opera House are Destination Venues in Covent Garden.
- 2.4. The distinction is important. A strong vision for the destination needs to be created by an appropriate mix of cultural, leisure and Destination Venue uses. Flexibility in relation to mix of provision is important, with the masterplanning process and further assessment being undertaken to refine the appropriate mix.
- 2.5. An initial approach is to establish a clear set of objectives for the destination that is sympathetic with the aspirations of the developers, the community and the local councils. Different opportunities and constraints – particularly in relation to the market, finance and risk – can then be considered in light of those objectives. Stakeholders can then consider different options for realising those objectives and evaluate those options to formulate a solution that delivers maximum benefit to all parties. At an early stage of masterplan development, stakeholders should focus on the principles of successful destination development, with the specifics of individual Destination Venues to come forward further along in the process.

Creating a successful destination

Flexibility

- 2.6. In locations that do not otherwise typically enjoy a high level of incidental footfall, there is a need for attractors that motivate visits. Destination Venues typically fit this purpose. However, the single greatest challenge that most Destination Venues face is not the ability to attract initial visits (e.g. due to novelty), but the ability to attract repeat and regular visits. It is the ability to generate repeat visits that guarantees the long term sustainability of destinations. Static destinations that do not change over time and do not reward multiple visits usually ultimately struggle.

EARLS COURT REGENERATION AREA: LEISURE STUDY

2.7. Built-in flexibility is therefore a major asset to any new destination and an important mechanism for minimising risk. This can partly be assured by the following:

- A financial plan that assures enough surplus to allow for a substantial sinking fund for constant reinvestment.
- Ability to change and renew content.
- Programming-based content, where the destination provides a competent venue for hosting different types of touring shows, be they major exhibitions (e.g. Tutankhamen, Bodyworlds), live entertainment, semi-permanent resident shows or similar types of ephemeral shows. It is for this reason that cinemas are such powerful anchors for shopping centres; why major performance venues anchor four of the most successful destinations in London (Barbican, Covent Garden, South Bank, the O2 Centre); and why London's West End, with the highest concentration of cinemas, theatres, retail and catering, is the most heavily focused part of London for leisure visits.

2.8. In combination with other types of leisure attractions, the prospect of long term sustainability is maximised by focussing on Destination Venues that afford the highest degree of flexibility, with the ability to change and adapt the product with a high degree of frequency.

Inventive and effective use of public realm (streets and squares)

2.9. Large scale mixed use destinations are defined by both the product they provide and the atmosphere created by the public realm. An important barometer of success is the degree to which the destination is used for unplanned visits by people confident that their time there will be rewarded with something pleasant to see or do.

2.10. Improvement of the public realm – in terms of design, maintenance, management and animation – was central to the success of the South Bank and Covent Garden. Modern shopping centres routinely seek to harness – some with greater success than others - the power of their public spaces to encourage longer dwell time and, as a consequence, higher spend.

2.11. The main purpose of destination development is the creation of a strong 'sense of place' – an identity and atmosphere that is very particular to that destination and cannot easily be replicated elsewhere. This is important, not only for attracting visits and footfall, but for adding value to other parts of the development as well as enhancing the image of the wider location. A 'sense of place' can be greatly assisted through effective use of a public realm that stitches together the destination's constituent parts (including the retail, catering and Destination Venues, as well as the homes, offices and hotels).

2.12. Covent Garden and the South Bank make use of art and programmed on-street entertainment. The Distillery District in Toronto, Fanieul Hall in Boston and Granville Island in Vancouver keenly manage their public spaces with events programming of the highest order and high quality control of street vendors and stalls.

2.13. In the context of the Earls Court Regeneration Area, the creation of place via the right combination of uses and public realm linkages is key.

Effective programming and management

- 2.14. For events-driven destinations, particularly with a strong public realm, there is a specific need for strong event management and programming. This is especially important in London where the competition is world class and the motivation to spend time and money in one destination as opposed to another must be a powerful one. There are two pre-requisites to achieving this condition:
- Management and staff of appropriate skills and calibre; and
 - The ability to maximise occupancy and use of all of the venues and spaces in the portfolio.
- 2.15. If planned from the outset, both of these are easier to achieve in a new destination (e.g. the Earls Court Regeneration Area) than it would be to try and retrofit this to an established destination (e.g. the West End). It was more easily achieved in Covent Garden and the Barbican (both of which fell under common management) and has been achieved over time at the South Bank. On the other hand, the fragmentation of ownership, programming and management at Salford Quays was a continued source of frustration for its major stakeholders and redressing this has been a key aim of its expansion and rebranding as MediaCity. Whilst the 'clean up' of Times Square in Manhattan began as a policing initiative by the Giuliani administration, its definitive rebranding as the city's pre-eminent family destination was driven by Disney's assertive leadership of the Times Square BIDS, which brought world class management, marketing and programming to bear.

Integration

- 2.16. Spend is a factor of dwell time and to the extent that the co-location of different attractors/activities can keep people on site for longer, the destination is enhanced and its financial position strengthened. Integration of different activities to either increase the appeal of the destination to one market or broaden its appeal to others has therefore become a key theme of all kinds of destination development. This is the driver behind the recent blurring of boundaries between cultural and commercial destinations with, for example, museum collections displayed in shopping centre atria, whilst destination shops and restaurants are developed for museums and galleries. Witness the success of restaurants and shops at Tate Modern, the Baltic and the South Bank Centre, the new leisure concepts housed within shopping centres, and arts/cultural anchors to mixed-use developments.
- 2.17. Integration brings a number of benefits, including a diversification of the product, increased activity and dynamism, stronger sense of place, longer dwell times and the concentrated marketing of multiple organisations. It is not just a matter of scale, but the combination of facilities and programmes that will draw markets from further, for longer and for a complex pattern of participation. Integrated destination management also solves many problems before they develop. Destinations benefit from a clear hierarchy of management regimes, which prioritises the public realm. Where destinations are overly sub-divided, effective management of the public realm becomes much more difficult. It is in 'the spaces in-between' that all of the sense of place is created or lost.

Mix of uses

- 2.18. For new destinations of significant scale, a balanced mix of uses works better than standalone attractions – irrespective of how large or 'iconic' they may be. To the extent that residential, office and hotel development – as well as retail, bars, restaurants and commercial leisure offers – bring people to the site and drive a steady flow of routine footfall, then the destination's sense of place is strengthened.

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2.19. Destinations that bring different uses together – particularly residential, office and hotel – provide a local, captive market that not only helps to underpin the viability of more ambitious Destination Venues, but by their very use of these venues makes them more appealing and attractive to users from further afield. It also lends a constant vibrancy to the destination with a different pulse and atmosphere depending on the season, day and hour. It brings to the destination a strong constituency of daily users who have a vested interest in its management, maintenance and stewardship. As a final point, more ‘eyes on the street’ adds to the sense of security so essential to the promotion and success of family oriented destinations.

2.20. The great opportunity presented by the Earls Court Regeneration Area, is the ability to integrate different uses in a mutually sympathetic way that capitalises on the synergy between the visitor experience, the office environment and the residential community. With the advantage of experience and analysis, the process that has so benefited the South Bank, for example, can be planned and accelerated in this key site.

Creation of image, identity and brand

2.21. A destination of multiple dimensions with a varied mix of uses, different Destination Venues and a constantly changing calendar of events and activities – especially where it is a new addition to a crowded London landscape – needs a powerful image and identity, which comes from an effective brand. Every element of the destination is strengthened by an overall understanding of a brand that defines the place and the product/service offer within it. Effective destination branding (in its broadest strategic sense rather than the narrow idea of logos and slogans) can make the difference between success and failure, between local attractions and Destination Venues of national and international significance. A strong brand is both an ingredient and a product of success. It provides the assurance of exciting attractors, a high quality of service and an infrastructure that operates so well that visitors, residents and workers will take it for granted. The customer is drawn to the location by a branded destination experience, not necessarily for the individual elements that make up the experience. It is underpinned by a strong sense of place that is felt on arrival and remembered when left.

Strong Destination Venues

2.22. Too often we see these principles of holistic destination development obscured by an excessive focus on particular attractions. At worst, these can become vanity projects where value is determined only by scale; or they can be driven by an ultimately futile ‘me too’ agenda. A more benign outcome is extreme risk aversion which prejudices thinking towards ‘can’t miss’ attractions that may be commercially sound but do little to enhance the sense of place or add any value to the destination as a whole. Both phenomena tend to result from fragmented thinking that separates individual attractions from the wider destination and fails to acknowledge the importance of the building blocks described above.

2.23. That said, accepting that their role and importance should not be emphasised to the exclusion of other factors, it is nonetheless important to recognise the power of appropriate attractions to anchor a destination and engender its brand. The South Bank is defined by the string of attractions that run its length from County Hall and the London Eye to Tower Bridge and the Design Museum. Covent Garden has the Royal Opera House and London Transport Museum, as well as the Covered Market. The Barbican includes a repertory cinema, concert hall, theatre, art gallery and a public library.

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2.24. Common factors across these, and a number of other examples, include the following:

- 1 A promotion of the performing arts or contemporary visual arts. This is partly because exhibit-based attractions are costly to develop and come at higher risk. In London, this trend is reinforced by high insurance and estate management costs. Performing arts instead bring the programming flexibility and change needed to sustain high levels of footfall over the long term and to adapt more easily to changing tastes, fashions and opportunities.
- 2 Combination of high culture, cutting edge and family fun. High culture and the avante garde bring kudos and credibility and high spending markets. The family market is strong. High penetration of either market is an asset; high penetration of both is a major success. So the South Bank benefits from the trendiness and gravitas of Tate Modern and the South Bank Centre, but entertains in equal measure at the London Eye, the London Aquarium and the London Dungeons. The Royal Opera House at Covent Garden is a British institution; but children prefer the London Transport Museum and the street performers. For major mixed use destinations, the idea that the whole family – mother, father, teen and toddler – will find something to do is a powerful selling point and a major competitive advantage.

3. FLAGSHIP DESTINATION VENUES: KEY CHALLENGES TO OVERCOME

- 3.1. Destination Venues can be powerful uses, yet they need careful planning due to key challenges which need to be met. These include:

Product Proposition

- 3.2. Destination success in a competitive marketplace demands the highest quality of product. Although there are examples of incidents where the appeal of the proposition can overcome a weak location (cf. The Eden Project), by and large it is important to have strength in both. If a concept is weak then regardless of the strength of the location, long-term viability is questionable (cf. the Centre for Popular Music in Sheffield).
- 3.3. It follows that any new attraction must be market-led and demand-driven. Any planning environment that indirectly encourages a supply-led approach to product development (i.e. where the nature and scale of the product is given greater weight and importance than consumer demand) should be avoided.

Capital Funding

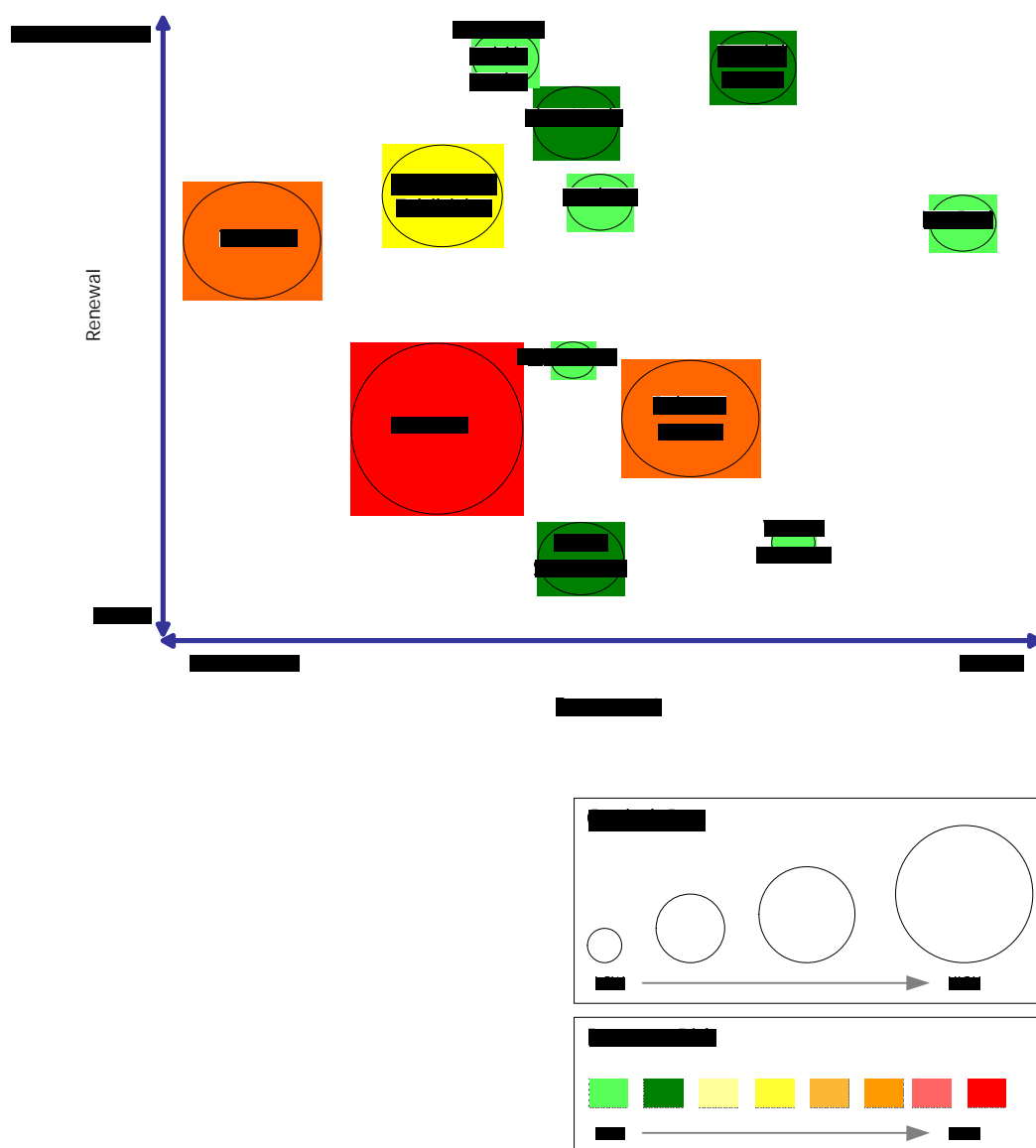
- 3.4. Large-scale attractions, especially when they include expensive iconic architectural solutions, necessarily come at a high cost. Of the thirty Millennium Commission projects defined by their “notable architecture” on the Millennium Commission web site, the average capital cost was £64.2m, the most expensive being the Tate Modern at £136.6m.
- 3.5. Developing venues of that scale must be heavily dependent on large-scale capital funding which traditionally came from some form of public sector grant (be it direct or via the Lottery Funds, the Arts Council or similar). Evidence suggests that with increased ambition comes higher risk and the difficulties experienced by the Lowry, the Baltic, the Glasgow Science Centre, and a host of other Lottery-led projects bear this out.
- 3.6. The probability of receiving capital funding on a similar scale is now much lower than it was. This is particularly true in a London context, where residents are so well supplied with cultural and artistic product that any proposed development will struggle to mount a compelling value-for-money case on the basis of public ‘need’.
- 3.7. Aspirations must therefore be aligned to realistic assumptions of the level of capital funding that can be raised in the current funding climate which is far worse than what it once was. Once again, in such an environment breadth of choice and options is fundamental.

Revenue Funding

- 3.8. The fixed costs associated with the running of large artistic or cultural institutions (including very high maintenance, programming, staffing and reinvestment costs), are substantial and well beyond the resources of most cultural and artistic organisations. The challenge of balancing the books is exacerbated when there is simultaneously a great deal of pressure on organisations to provide low cost (if not free) public access in order to meet social inclusion objectives.
- 3.9. As a result, there are few operators in this field that would survive without significant public sector revenue funding. Even destinations hailed as popular successes require large revenue grants to maintain them. The Glasgow Science Centre has an annual operating deficit in excess of £2m. The Lowry in Salford receives a significant amount of revenue support from Salford City Council yet still operates at a deficit.

EARLS COURT REGENERATION AREA: LEISURE STUDY

- 3.10. Failure and financial stress is not restricted to provincial markets. London has experienced its own share of failure with closures including the Premier League Football Hall of Fame, the Spitting Image Experience and the BBC visitor centre. Managing artistic and cultural attractions is a difficult and expensive business irrespective of where the attraction is located. The revenue profile of cultural and artistic organisations – characterised by high fixed costs as a proportion of total costs and high sensitivity to changes in demand – carries risk, even in a context where there is likely to be a high volume of passing trade.
- 3.11. The diagram below sets out a selection of destination uses/Destination Venues which illustrates generalised trends for certain example uses in terms of (i) capital cost and revenue risk, (ii) fixed versus programmed events/attractions, and (iii) static versus active participation. This, in general, terms highlights the need for masterplanning and viability focus in relation to destination uses/Destination Venues:



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- 3.12. In a crowded London marketplace and in the current funding climate, high cost / high risk options should generally be avoided, particularly because there is abundant evidence to demonstrate that a strong sense of place can be created through creative use of smaller scale and lower risk attractors.

4. EXAMPLE COMMERCIAL LEISURE CONSUMER DEMAND AND USES

- 4.1. Alongside cultural and Destination Venue uses, there is a strong general leisure use consumer demand, with some examples set out below. It should be noted that the RBKC and LBHF, GVA Grimley's West London Retail Needs Study (for LBHF) and Nathaniel Litchfield and Partners Retail and Leisure needs study (for RBKC) also provide some useful evidence. They indicate a number of existing commercial facilities including cinemas, bingo clubs, ten-pin bowling destinations, bars, clubs and restaurants, and health and fitness clubs within RBKC and LBHF but there are gaps and deficiencies in the quality of facilities in particular and the quantum of development in the Earls Court Regeneration Area itself will lead to a significant increase in terms of the immediate catchment.
- 4.2. By way of example leisure uses (a selection only):
- 4.3. **Cinemas:** the industry is now dominated by three main operators (Odeon, Cineworld and Vue), the emphasis is shifting from consolidation to physical expansion. This is the same for their two smaller rivals, The Showcase owned by National Amusements and the Ward Anderson group of companies which own Empire. Multiplex cinemas are now heavily present in the market with over 70% of available screens in 2006.
- 4.4. Cinemagoing 16 published in March 2007 by Dodona Research forecasts that by 2011 more than 300 screens will be added to the 3,440 screens operating in 2006. According to predictions in Cinemagoing 16, British cinema-goers will pay nearly £1.1 billion for cinema tickets in 2011, this is due to a strong upcoming film product, benefits from digital projection and a turn in the investment cycle to new cinemas.
- 4.5. **Health and Fitness Clubs:** The UK health club market expanded rapidly as public awareness about personal fitness has increased. Business in Sport and Leisure (BISL) 2008 indicates healthy growth across the industry with the Fitness Industry Report stating that by the end of March 2007, there were 5,714 combined public and private sector fitness sites across the UK, 3,117 private clubs and 2,597 gyms within public sports centres. Since 2006, 232 new facilities had opened. The total number of UK health and fitness members at public gyms and private health clubs is now over 7 million, about 1,225 members per club.
- 4.6. Nearly 12% of the population are now members of a private health club or registered users of a leisure centre gym in the UK, compared with just 8.9% in 2002 and this growth looks set to continue. Private health clubs in the UK range from small independent clubs to large operators such as Nuffield Health, David Lloyd, Esporta, Fitness First, Virgin Active, Bannatyne and LA Fitness.
- 4.7. Private health clubs had 4.2 million members in 2007 (1,375 members per club). The largest health clubs can have memberships of approximately 4,000 people. However, independent clubs remain a strong presence in the private sector market running 55% of all private clubs. Of the 126 new private health clubs that have opened since January 2006, 58% were independent clubs and 42% were owned by multi-club operators. Public sector sports centres are also important, and the market increased significantly between January 2006 and March 2007, with 106 new facilities opened and in terms of like-for-like membership growth rates, the sector saw an impressive 4.6% growth.
- 4.8. There are a wide variety of health and fitness clubs across West London; the GVA Grimley study for LBHF recommends that health and fitness clubs should be encouraged within town centres and within mixed-use retail/residential schemes. This market has grown steadily in recent years, and Mintel research predicts this trend will continue as awareness of personal health and fitness becomes more widespread throughout different sectors of the population.

EARLS COURT REGENERATION AREA: LEISURE STUDY

- 4.9. Future increase in membership rates and population growth could generate additional demand. By way of an example, an increase in membership rates from 12% to 15.6% (the US rate) along with projected population change in the study area could increase demand by nearly 30,000 places by 2015 in the study area as a whole, the Boroughs' potential share of this growth (28%) would be over 8,000 places.
- 4.10. These figures suggest there is scope for further health and fitness facilities within the LBHF and the RBKC, particularly in the future in line with the increase in population and membership rates.
- 4.11. **Tenpin-Bowling** - There were 280 tenpin bowling centres (5,600 lanes) in the UK in 2004, approximately one lane per 10,000 people. The tenpin bowling sector experienced steady growth in the late 1990s, with a 27% growth in spending during the last 10 years, although any real growth was mostly in the past four years. Mintel predicted the value of the tenpin bowling market would increase from £245 million in 2002 to £324 million by 2007.
- 4.12. Bowling centres now tend to be part of major leisure developments that include multiplex cinemas, restaurants and nightclubs, offering a choice of leisure and entertainment activities.
- 4.13. Tenpin bowling centres require large buildings of between 2,300 to 4,200 sq m (25,000 to 45,000 sq ft) and are generally located in towns with a population of over 150,000 people.
- 4.14. **Bingo** - In 2007, Great Britain had 643 commercial bingo clubs, approximately one club per 90,000 people. The amount staked on bingo in 2007 was £1,820 million. Mintel forecasts that admissions will be 68 million in 2010, with the average spend per head reaching £38.40.
- 4.15. Mecca and Gala are the main bingo operators, controlling over half of the UK market. Marketing of the bingo sector has been more proactive in recent years and Gala and Mecca have invested in premises, moving out of dated premises (i.e. converted cinemas), into purpose built units. Bingo clubs have become increasingly sophisticated, and have actively sought to attract all age groups.
- 4.16. The bingo sector usually prefers central locations that are accessible by public transport and by foot. Major bingo operators, such as Mecca and Gala, require buildings of between 2,000 to 3,000 sq m, capable of seating up to 2,000 people, with a catchment population of 50,000 to 70,000 people within freestanding towns (source: BISL)
- 4.17. There are no bingo or bowling facilities in RBKC, the household survey indicates that residents who visit bowling facilities in the study area mainly go to Queens Ice Bowl on Queensway (25%), Park Royal, Acton (22%) and the West End (10%). There is scope for these types of facilities in the Borough, although to date the lack of available sites or large premises and high land values/property prices has limited potential in Kensington & Chelsea.
- 4.18. As the Earls Court Regeneration Area masterplan develops it may be that uses such as bingo would be complimentary to the overall scheme proposals and should be incorporated within the commercial leisure element.

EARLS COURT REGENERATION AREA: LEISURE STUDY

- 4.19. **Nightclubs** - The value of the nightclub market (permanent venue offering dancing in return for an admission fee) was £1.77 billion in 2002 (source: Mintel - Nightclubs). There are approximately 1,700 nightclubs in the UK, approximately one per 30,000 people. The forecast trend of significant growth in the 18-24 year old age group is expected to provide a market stimulus. There are a number of smaller nightclubs and private members clubs in both RBKC and LBHF, but there is significant leakage to competing town centres and principally the West End.
- 4.20. **Casinos** - Due to the changing nature of the casino market, there is uncertainty to where casinos will be located in the future. Prior to deregulation, operators could only obtain licences for casinos in specifically defined areas. Operators now have to think in more detail about the catchment area of their casinos and the level of existing or future competition in a given area. The proximity of other established commercial uses will also be a key factor for operators when looking at locations for casinos.
- 4.21. There were 138 licensed casinos operating in Britain at 31 March 2007 with a further 40 licensed casinos, although some of these will be replacements for existing establishments. Attendance at casinos by members and guests increased by 8% from the previous year to over 15 million.
- 4.22. There are some existing casinos in RBKC and LBHF, including the Connoisseur Club, The Mint, Cromwell Mint Casino, Gloucester Casino and Maxims Casino Club. There may be opportunity for further casinos of different size, scale and brand within a leisure and destination offer.
- 4.23. The above potential mix of commercial leisure uses comprises just some typical commercial leisure uses, illustrating the type of demand there is. Further assessment would be undertaken as part of a masterplanning process for Earls Court Regeneration Area. In the indicative land use budget for Earls Court Regeneration Area, around 9,000 to 10,000 new homes are proposed and a significant amount of office, hotel and retail floorspace. In order to be most successful as a mixed use destination, a significant leisure component to cater for demand from the new development will be required.
- 4.24. There is a strong commercial leisure component to most Urban Quarter schemes across London as highlighted in the table below, which reinforces the need for a significant commercial leisure floorspace component to the Earls Court Regeneration Area proposals:

EARLS COURT REGENERATION AREA: LEISURE STUDY

No.	Urban Quarter	Offices (ft ²)	Resi. (units)	Retail (ft ²)	Leisure/Recreation Use(s)
1	Paddington (E)	*1.3 million (955,300)	219 (3 buildings)	55,000 (c.64,000)	Leisure, surfed and tiered amphitheatre
2	Canary Wharf (E)	16 million	15,000 +	662,000	2 Hotels, leisure, 20 acres of landscaped open space, health club
3	Cardinal Place (E)	593,500	none	115,000	Turfed and tiered green space
4	More London (E)	1.8 million	none	88,300	Hotel, health club, amphitheatre
5	Broadgate (E)	4.8 million	none	53 Units	Hotel and health club
6	Chiswick Park (E)	*1.1million (294,000)	none	14,500	Health club
7	Kings Cross Central (P)	4 million	1,900	495,000	Hotels, Serviced apartments, Student accommodation, leisure, health, education
8	Wood Wharf (P)	Share of 3.5 million ft ² of commercial space	1,400	TBC	Health centre, park, world-class water-space, hotel, leisure, community services, new high street
9	Elephant and Castle (P)	TBC	5,300	TBC	New Station, civic square
10	Stratford City (P)	Landmark towers	4,800 units	1,600,000	Hotel, leisure, parks, health centre and car parking
11	Battersea Power Station (P)	TBC	TBC	TBC	TBC
12	Greenwich Peninsular (P)	135,000	13,800 homes	335,000	26,000 capacity arena, new business park, schools, health centre, hotels

(E) = Established
(P) = Projected

Source: King Sturge

*Floorspace / unit figures for Established Urban Quarters relate to completed buildings and buildings under construction, (figures in brackets relate to proposed floorspace)

5 CONCLUSIONS

- 5.1. The Earls Court Regeneration Area strategic site allocation proposals include an indicative land use budget of between 35,000m² and 50,000m² of new commercial leisure floorspace and destination venue floorspace. These land uses are considered key to creating a sustainable mixed use community.
- 5.2. "Cultural" and "Leisure" uses include a range of Class D uses, including, for example, cinemas, bowling, night clubs, health and fitness and other sports and leisure uses. "Destination Venue" uses comprise uses which have the potential to create a destination draw and sense of place to the Earls Court Regeneration Area.
- 5.3. There is a significant quantum of existing D1, D2, B1 and associated and ancillary uses within the Regeneration Area, principally at the Exhibition Centres. As such any future cultural, leisure and destination uses incorporated in the masterplan process should be seen as a substitution rather than an untested addition to the area.
- 5.4. In terms of destination, Earls Court already has an established brand, which is a major asset. It is a well known location, with positive attributes and associations, existing activity and strong connectivity. It is a natural fit with the existing brand, reputation and Exhibition Centre and related uses to have a significant amount of leisure, cultural and Destination Venue floorspace in the Regeneration Area. In terms of brand, competing destinations spend millions of pounds to achieve lesser levels of recognition, so the advanced starting point of the Regeneration Area provides a real benefit and attraction.
- 5.5. There are challenges which need to be met for Destination Venues, particularly in relation to capital and revenue funding. Destination Venues need to be well planned and significant attention paid to viability, including learning lessons from other Destination Venues which have not succeeded. Flexibility in terms of offer and operation is desirable. A number of areas require assessment including (i) capital cost and revenue risk, (ii) fixed versus programmed events/attractions, and (iii) static versus active participation. A flexible approach in a strategic site allocation is key to allow appropriate masterplanning to take place. High quality public realm working well with Destination Venues is also important to create a strong sense of place.
- 5.6. The mix of cultural, destination and leisure uses helps create a destination and draw, for example, restaurant and bar operators, as well as making it an attractive place for residents and office workers. For example, health and fitness clubs, cinemas etc. have a positive effect on the development as a whole, by creating a place people want to live, work and play in. In general, commercial leisure facilities tend to draw the main part of their customer base from residents up to a 20 minutes travel time. Major leisure facilities such as cinemas, ten-pin bowling centres, ice rinks and family entertainment centres often benefit from locating together and creating a leisure offer of scale. The Regeneration Area's strong transport connectivity is also a real asset to support a significant destination, cultural and leisure set of uses. All this helps deliver a mixed use community for the wider regeneration aspirations for the EC Regeneration Area.
- 5.7. There is significant demand for general commercial leisure uses, both existing and new demand created by the development of the Regeneration Area itself. Most new urban quarter developments across London and elsewhere comprise a significant amount of leisure and related floorspace, exemplifying the importance of the uses to a mixed use community and successful creation and sense of place.
- 5.8. Further assessment of the type and mix of destination, cultural and leisure uses will be undertaken as part of the masterplanning process for the Regeneration Area.



EARLS COURT REGENERATION AREA (LBHF AREA)

SUMMARY HOUSING STUDY FOR LBHF CORE STRATEGY OPTIONS

**CAPITAL&COUNTIES ON BEHALF OF EARLS COURT & OLYMPIA
GROUP (EC&O)**

July 2009

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KEY POINT SUMMARY

- This summary report has been prepared by RPS and First Base for Capital & Counties ("**C&C**") on behalf of Earls Court & Olympia Group ("**EC&O**")
- There is considerable unmet demand for new housing – both affordable and market – within LBHF evidenced by a combination of house price pressure, population growth projections and waiting list numbers. The Earls Court Regeneration Area land comprises land within LBHF ("**the H&F area**") and land which lies within the adjoining Royal Borough of Kensington and Chelsea ("**the K&C area**"). The H&F area has considerable capacity for housing provision and this, coupled with its ability to deliver opportunities for estate renewal, warrant it being promoted as a strategic option within the emerging LBHF CS with this status being developed as an integral part of a supplementary planning document promoted as part of the wider Earls Court Regeneration Area planning framework.
- The provision of a significant housing component on the Earls Court Regeneration Area (H&F Area) will facilitate improvements to tenure balance, house type choice and quality, with each assisting in delivering a more mixed and balanced community. The work undertaken to date including density assumptions suggests that in the order of approximately 8,500 homes can be accommodated within the Earls Court Regeneration Area (H&F Area).
- C&C supports the emphasis on the creation of a mixed and balanced community with an improved intermediate housing offer being the major component of any affordable housing provision.
- C&C supports the view that redevelopment of the Earls Court Regeneration Area H&F Area provides a unique opportunity to bring comprehensive regeneration proposals for the Earls Court Regeneration Area as a whole.
- C&C supports flexibility being incorporated within the emerging policy framework to allow the Earls Court Regeneration Area scheme proposals to be considered in light of evidence, master planning, cross Borough boundary working, community consultation and development viability.

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- The policy provisions of the LBHF CS should allow for the various components of the overall comprehensive regeneration vision for the wider Earls Court Regeneration Area to be advanced independently with due regard paid to the wider context. This will allow for sufficient certainty of delivery and flexibility in the LBHF CS policy framework for the Earls Court Regeneration Area.

SECTION 1: INTRODUCTION

- 1.1 This document has been prepared by RPS and First Base for C&C on behalf of Earls Court & Olympia Group (EC&O).
- 1.2 This document relates to the Earls Court Regeneration Area land, part of which lies within LBHF ("the '**H&F Area**') and part of which lies in the Royal Borough of Kensington and Chelsea ("the '**K&C Area**'). Whilst the existing and emerging policy framework for the Royal Borough of Kensington and Chelsea ("**RBKC**") will apply to the part of the Earls Court Regeneration Area which falls in RBKC – the K&C Area, this document relates primarily to the H&F Area. A separate housing summary study has been submitted by C&C to RBKC in relation to the K&C Area. Each Borough has indicated it intends to work together with the Earls Court Regeneration Area promoters to ensure a complementary joined up policy framework in respect of the overall strategic allocation for the whole of the Earls Court Regeneration Area which lies across the Borough boundaries.
- 1.3 The comprehensive redevelopment of the Earls Court Regeneration Area for a high quality, sustainable, mixed use scheme provides real opportunity to provide the area with a new sense of place, new homes, jobs, open space and community facilities alongside securing considerable regenerative benefits to the community and wider area.
- 1.4 The proposed Earls Court Regeneration Area proposal has the ability to deliver a considerable number of good quality new homes on a highly accessible site in a central location within West London. The scale of the project warrants its allocation as a strategic proposal as it allows for a very significant contribution to housing supply, both affordable and market for LBHF & RBKC, with delivery in accordance with national, regional and local planning objectives.
- 1.5 This summary study considers in the context of the provision of Housing the key aspects of the proposal and reflects on how these accord with the various components of the Core Strategy Options ("**CSO**") document presented by LBHF for consultation alongside the provisions of National and Regional housing policy.
- 1.6 C&C supports the designation of the Earls Court Regeneration Area as a site of strategic importance in the LBHF CS on the basis that it is well placed to deliver a

new mixed community according with the Decent Neighbourhood principles of the Spatial Vision component of the CSO. C&C recognises the importance of delivering a mixed community on a scheme of this scale and identifies the wider regenerative benefits that new homes will bring to the area. Designating the Earls Court Regeneration Area as a site of strategic importance will assist both LBHF and RBKC in meeting the challenge of housing delivery, addressing identified needs in both market and affordable housing, and facilitating very significant regenerative benefits as part of a scheme with London significance.

- 1.7 The Earls Court Regeneration Area (both the H&F Area and the K&C area) offers as a whole the potential to deliver residential provision of approximately around 9,000 to 10,000 homes. The Earls Court Regeneration Area H&F area in itself has capacity for up to around 8500 new homes in a mix of house types. The scheme will make a substantial and valuable contribution to the housing numbers required within the LBHF and wider sub region.
- 1.8 The complexities associated with the various development components of the Earls Court Regeneration Area H&F Area and the wider Earls Court Regeneration Area require a policy framework which allows deliverability on a comprehensive basis, having regard to any proposals for the North Fulham Regeneration Area. Proposals in both the Earls Court and North Fulham Regeneration Areas may well be advanced at different stages over the plan period and this should not limit the potential for either Regeneration Area to come forward to deliver their contribution to overall LBHF regeneration. In short, in delivery terms an independent policy allocation, paying due regard to the North Fulham Regeneration Area and surrounding area, is required to ensure sound, effective, deliverability of the Earls Court Regeneration Area in PPS12 terms.
- 1.9 The study concludes that the significant scale of this redevelopment proposal, its location and the relationship to estate renewal opportunity, place the scheme in an excellent position to both meet the need for both market and affordable housing, whilst providing an opportunity to deliver considerable regenerative benefits within the existing community, across LBHF and RBKC and the wider West London sub region.

SECTION 2: UNDERSTANDING THE STRATEGIC OBJECTIVES OF THE LBHF CORE STRATEGY

2.1 This section considers the Strategic Objectives identified by the LBHF CS at section 6 of the LBHF CSO and identifies how in respect to housing provision they relate to the existing policy framework nationally, regionally and locally and to the housing market conditions which exist in the LBHF.

2.2 National planning policy on housing has been the subject of extensive review and consultation over recent years, culminating in the publication of Planning Policy Statement 3: Housing (PPS3) in November 2006. PPS3 provides the national planning policy framework for the delivery of Central Government's housing policy objectives; it sets out the Government's key housing policy goal as being to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live (paragraph 9).

2.3 To achieve this overriding goal, four key objectives are sought and can be summarised as:

- Increasing the supply of housing;
- Delivering quality and choice for all;
- Widening opportunities for home ownership; and
- Creating sustainable, inclusive and mixed communities.

2.4 Specifically in relation to affordable housing, the Government sets out its commitment to providing a range of housing to meet the needs of people with varying incomes.

“The Government is committed to providing high quality housing for people who are unable to access or afford market housing, for example vulnerable people and key workers as well as helping people make the step from social-rented housing to home ownership” (paragraph 27).

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- 2.5 In planning at site level, PPS3 also requires that the amount and type of housing sought should be established through the creation of a robust evidence base including the completion of a Strategic Housing Market Assessment. A further key principle (paragraph 29) is that the deliverability of targets set in local policy frameworks should also be tested to verify that such targets are balanced against risks to delivery and the creation of mixed and sustainable communities.
- 2.6 Providing opportunities for home ownership is a consistent theme of government policy and the planning system is identified as having an important role in delivering intermediate tenure housing. The benefits of intermediate housing are recognised:
- “a sufficient supply of intermediate affordable housing can address the needs of key workers and those seeking to gain a first step on the housing ladder, reduce the call on social-rented housing, free up social-rented homes, provide wider choice for households and ensure that sites have a mix of tenures” (paragraph 29)*
- 2.7 PPS3 also seeks to ensure that Local Planning Authorities ensure that they possess a rolling 5 year supply of housing sites (paragraph 54).
- 2.8 Delivering Affordable Housing, the sister guidance document to PPS3, provides guidance on the role of local authorities in the delivery of affordable housing. It states that Local Authorities are required to ensure that existing housing provision be balanced carefully with future housing demand. Delivering Affordable Housing also requires that new housing developments contain a good mix of tenures (paragraph 12).
- 2.9 The thrust of PPS3 is therefore to ensure that policies facilitate the delivery of sufficient high quality housing which meets needs, encourages home ownership and delivers on the Government’s sustainable community agenda
- 2.10 The regional planning position is provided by the London plan (“LP”) which seeks to provide for significant new housing provision (450 pa or more in LBHF) to be secured in order that the expected population growth for the sub region can be accommodated. Further additional supply is vital to reduce affordability pressure which has arisen where imbalance between demand and supply exists. This is a
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particular issue for parts of the LBHF where house price pressure is exacerbated by a shortage of supply.

- 2.11 The LP seeks to secure the provision of mixed and balanced communities (policy 3A.9) and provide improved housing choice in terms of mix and types of new provision (policy 3A.5) and promotes intensification of housing provision through higher density development where sustainability is secured (policy 3A.2).
- 2.12 Policy 3A.10 requires Boroughs to seek the maximum reasonable amount of affordable housing when negotiating individual private residential and mixed-use schemes, subject to development viability and having due regard to the availability of public subsidy. The LP currently seeks to achieve the target that London wide 50% of all new homes should be affordable with a target London wide tenure split of 35% social rented units and 15% intermediate. Since the adoption of the LP the mayor has stated his intentions to substantially amend this policy approach with a move to individually agreed Borough targets and a revised direction in respect of intermediate and social rented provision. This process is currently ongoing and emerging local policy should appropriately consider the changing regional position.
- 2.13 The LP requires Boroughs to encourage rather than restrain overall residential development and to reflect individual site circumstances thus requiring targets to be applied flexibly, taking into account individual site costs, the availability of public subsidy and other scheme requirements. A wider range of provisions are advanced to promote mixed and balanced communities (para 3.41), intermediate provision, reduce polarisation and outward migration due to lack of suitable accommodation and meet the population growth requirements.
- 2.14 LP housing policy is supplemented by a Housing SPG, this was published in November 2005 and confirms that whilst affordable housing should normally be provided as an integral element of a residential development, off site provision of affordable housing may be acceptable where there are demonstrable benefits to be gained by providing new units in a different location (Paragraph 18.17). An alternative site or sites should be identified which would enable more appropriate provision of affordable housing provision and up-front delivery.

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- 2.15 The mayor has recently issued for consultation a draft housing strategy. This strategy sets out an approach to secure the provision of high quality homes which offer a better mix of types including innovations in tenure choice in order that the aspirations and housing needs of Londoners are met. This is an important document for housing provision in London and will provide added weight to the policy framework of the LP and SPG.
- 2.16 The settled local policy position in LBHF is the Unitary Development Plan which was adopted in August 2003 (amended 28 September 2007 and 5 December 2008) and promotes residential developments in line with strategic delivery targets. The UDP seeks to discourage the net loss of housing within the borough (policy HO1) and seeks to secure a mix of housing type and tenure in new residential developments. The Policy H06 which detailed local density requirements was not saved and as such the LP provides material direction.
- 2.17 The Secretary of State directed that several of the UDP Housing Policies not be saved and instead reliance on LP policy be used on issues such as density and affordable housing until the LBHF Core Strategy be progressed. By way of a court order dated 5 December 2008, the Direction issued by the Secretary of State on 27 September 2007 to extend Policy HO5 (affordable housing) has been quashed. The Council AMR (2008) confirms that the Borough will operate the LP policies in respect of affordable housing targets until the CS is of sufficient material weight.
- 2.18 The CSPO sets out strategic objectives which form a key aspect of the background direction for the policy framework. These have been identified by the Council as being necessary to achieve the overall Spatial Vision for the Borough which in turn develops the aspirations and targets of both the Community and Housing strategies.
- 2.19 The Community Strategy and Housing Strategy were prepared during 2007 and were developed having regard to the emerging Core Strategy Options paper that was initially presented for consultation during 2007. The Community Strategy considers the situation of the Borough and identified the Vision to create a 'Borough of Opportunity' with a 'ladder of opportunity' promoting amongst other things: Home Ownership, A cleaner, Greener Borough, and Regeneration of the most deprived parts of the Borough. The document acknowledges the contrasts which exist in LBHF between the generally low income and consequently deprived areas and the high
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income high property values of other parts of the Borough. It considers that the Council must take account of the strong correlation between high concentrations of social rented housing and deprivation when promoting housing opportunities and alludes to the considerable difficulties facing younger households in accessing suitable accommodation.

2.20 In response, the Strategy identifies seven key challenges which need to be tackled in respect of the housing situation in order to deliver on the Borough of Opportunity vision. These challenges include the imbalance between high proportions of social rented and private rented accommodation, the failure of the current housing offer to provide opportunities to those on low to middle incomes and a recognition of the key role that sub regional and regional developments play in delivering housing to meet demand. These identified challenges are coupled with thirteen key objectives including providing additional opportunity for social rented tenants, provision of high quality housing in new developments which complements the neighbourhood in which it is located, developing an estate renewal and asset management plan to deliver for future generations. These are framed within the wider aspiration to develop and sustain thriving mixed income neighbourhoods where a key aim is to secure a better balance of tenures particularly where high concentrations of social rented accommodation currently exists.

2.21 The Housing Strategy 2007 – 2014 was developed in parallel with the Community Strategy and therefore not surprisingly identifies a comparable set of themes and challenges on which the Council should focus. The Housing Strategy identifies in the Introduction that:

“Most of all it [the housing strategy] is a keystone to the delivery of the objectives set out in the Boroughs Community Strategy In this respect the Housing strategy is geared towards the delivery of high quality, outcome focused and value for money housing and housing services that provide opportunities for households to get on and help deliver successful neighbourhoods and communities where people want to and can live now and into the future.”

2.22 This clearly sets the aims of the Housing Strategy and importantly sets its context with that of the Community Strategy. In a similar vein to the Community Strategy, the

Housing Strategy identifies a number of challenges which range from promoting and securing an increased level of housing supply to meet demand both affordable and market through to provision of improved housing services functions. These challenges come together to form the Vision which includes:

“Increase housing supply and deliver high quality housing and public spaces on new developments that meet resident expectations and complement existing neighbourhoods,

Work to bridge the social divide by increasing levels of employment, providing more home ownership opportunities for low to middle income households and deliver more mixed and sustainable communities.”

2.23 It is therefore clear that both the Community Strategy and the Housing Strategy are seeking to increase housing provision in the Borough, improve quality, tackle incidence of deprivation with potential renewal programmes, seek to provide a better balance of tenure particularly where there are high levels of existing social rented provision and overall develop and sustain thriving mixed income neighbourhoods.

2.24 These key elements remain a strong theme within the LBHF CSO currently presented for consultation. The CSO sets out the Spatial Vision which identifies headline key priorities ranging from the promotion of home ownership through tackling crime and the provision of high quality public services. These Spatial Visions are brought together under the key Council goal of creating decent and aspirational neighbourhoods through providing better housing mix, promoting good design and widening the tenure choice to promote mixed income communities. The strategic objectives of the CSO combine the spatial vision objectives, represent the housing strategy and community strategy provisions considered above and bring them together to form a basis on which to direct future policy. Having particular regard to the housing related objectives, these are identified as being:

- *Create decent neighbourhoods throughout the Borough, and in particular, regenerate the most deprived parts of the Borough, especially in White City, west Kensington/North Fulham and Hammersmith.*

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- *Increase the supply and choice of high quality housing and ensure that the new housing meets local needs and aspirations, particularly the need for affordable home ownership and for homes for families.*
 - *Renew and transform key council housing estates to decent neighbourhood principles.*
 - *Reduce polarisation and worklessness to create more stable, mixed and balanced communities.*
 - *Ensure that regeneration meets the diverse needs of not only the H&F of today, but also future residents and visitors.*

2.25 It is evident that a strong interplay exists between the two strategies and the strategic objectives of the CSO and it is relevant to consider the housing market situation which drives this 'policy' response proposed by the Council.

2.26 The LBHF is a polarised Borough which ranks in the top 30 Boroughs nationally in terms of socio economic and educational polarisation. The index of multiple deprivation (IMD) 2004 ranks it 42nd nationally and 14th within the London Boroughs. It therefore has some of the most prosperous neighbourhoods in London alongside some of the most deprived nationally, with the most deprived neighbourhoods aligned with those with the highest proportion of social rented accommodation.

2.27 Furthermore the 2001 census evidences the high level of existing social rented accommodation as a proportion of the total Borough housing stock of about 34% (compared to London wide at 26%). This, coupled with the considerable private rented sector, effectively marginalises the number of properties in the owner occupied sector. Whilst the market dynamics will be in part driven by quality and locational issues, high house prices (4th highest Borough/District mean nationally to 2008) are also as a result of shortage in supply and the fact that for the most part the Borough is considered a desirable location in which to live.

2.28 In addition, Borough incomes are polarised between those generally on low incomes in the existing social rented housing stock and those in owner occupied accommodation. Whilst the private rented sector operates to an extent in the middle ground, it does not adequately cover the gap in incomes between those in social

rented accommodation and those in the owner occupied sector. This creates a wide 'intermediate housing gap' which is not filled with sufficient intermediate affordable housing options given only around 1% of the total housing stock is this tenure. As a result, households unable to secure private rented accommodation within their budget are forced towards social rented provision or to relocate outside of the Borough. This market imperfection furthers the social and income polarisation between social rented and market provision, undermining the ability of the council to secure mixed income decent neighbourhoods.

- 2.29 A further driver in the Borough is the gap between supply and demand. Existing households cannot secure suitable accommodation as highlighted above but emerging households are also similarly affected. Emerging households are increasing as a consequence of households restructuring (for instance through separation) and via population growth through inward migration and growth within the existing population.
- 2.30 The previous section of this study has identified the Borough's aspiration to secure improved neighbourhoods by delivering on the identified strategic objectives of the CSO. These broad objectives comprise the broadening the affordable housing offer through intermediate provision, a better mix of house types in social rented provision, securing and delivering additional housing supply to accommodate population growth and seeking to deliver on wider aspirations of improved and sustainable mixed income neighbourhoods. These strategic objectives have regard to the socio-economic situation which exists in the Borough with polarised incomes and localised levels of high deprivation alongside consideration of the intermediate housing gap which exists in the affordable market and the need to broaden the offer of affordable housing particularly within the intermediate sector.
- 2.31 In light of PPS12 seeking conformity with national and regional planning position, it is key that the CSO makes appropriate provision for the delivery of new homes to allow the objectives of the LP and PPS3 to be delivered alongside the provision of high quality mixed and sustainable communities. The next section of this study considers the redevelopment of the Earls Court Regeneration Area H&F area and particularly how it relates to the identified strategic objectives of the Borough.

SECTION 3: WHY THE EARLS COURT REGENERATION AREA IS KEY TO DELIVERING THE CS STRATEGIC OBJECTIVES

- 3.1 This section considers the strategic objectives of the CSO and those of the Community Strategy and Housing Strategy and identifies how the proposals at Earls Court Regeneration Area are very well placed to deliver on these principles.
- 3.2 The Transport evidence presented as part of these CSO representations identifies that a range of enhancements can be achieved which will improve an already accessible area creating strong connectivity to the sub region and London.
- 3.3 The delivery of a comprehensive scheme will require a detailed master planning approach to confirm the appropriateness and viability of such a comprehensive approach. This process will inform the final location, density and types of affordable and market housing proposed. In this context, it is important that the framework for the Earls Court Regeneration Area incorporates sufficient flexibility to allow an appropriate range of proposals to be developed within it.
- 3.4 As identified above, the London Plan has identified a strategic target for the LBHF in terms of housing numbers of 450 dwelling per year. The LP expects Boroughs to seek to exceed these figures (policy 3A.2) and LBHF has indicated in the CSO that they intend to revise the target to 650pa as a monitoring target which may be exceeded. The LP proposal (of 450pa or more) derives from the Mayor's London Housing Capacity Study from 2004 which considered the capital's ability to deliver housing to meet the needs both existing and deriving from expected population growth. The study considered the target for new homes both market and affordable identified by the 2004 Housing Requirements study of 35,400pa and identified sufficient capacity across London to deliver about 31,500pa across the plan period. As a result the LP provisions were increased from the previous target of 23,000pa to the current target provision of 30,500pa.
- 3.5 It is evident from these figures that even where the full LP provision is secured, a gap between provision and need would exist of some 4,900 homes pa. This gap remains

with the recent London region SHMA produced in May 2009 identifying a range of annual housing requirements all of which are above the annual LP target with the overall position suggesting some 366,800 new homes are required over the next ten years to meet need.

- 3.6 The latest population dataset prepared jointly by the GLA and Experian in 2009 suggests that the population of LBHF will increase by some 21,100 residents to 2026. This continues to represent a significant additional market pressure particularly in the context of what is a highly polarised housing market. The findings of the recent London SHMA support the conclusion that the need for additional homes remains significant with the findings suggesting some 36,700 properties being required annually to resolve existing and emerging housing needs. It is therefore evident that LBHF must deliver strongly against this London wide target to both meet need and avoid pressure on affordability from a lack of supply.
- 3.7 Against this context of housing need and delivery against targets, the National Affordable Housing Planning Unit has identified that a target range of 33,800 to 42,600 new homes per annum are necessary in London to address affordability issues relating to housing costs. Indeed the Unit suggests that the shortfall which occurred between 2002 and 2007 probably contributed to the escalating affordability problems of that period.
- 3.8 It is apparent from the Annual Monitoring reports from the last three years that provision of new homes in LBHF has outperformed the notional LP target of 450 new homes per year. However, there is considerable pressure in need terms (as evidenced against the London wide need position) for delivery of housing numbers throughout the new plan period. Indeed LBHF acknowledges in its recent annual monitoring report that as strategic sites begin to deliver, the housing trajectory will allow a greater provision from that currently directed by the LP.
- 3.9 The London SHMA identifies a considerable requirement which should be properly reflected in strategic site allocations, with the implication that a failure to deliver will result (particularly in the context of LBHF) in a widening gap between supply and demand with the price pressure which results. In order to secure the principles of mixed income communities advocated clearly within PPS3 and in the LP, it is important to secure a consistent but significant delivery of both market and affordable new homes.

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- 3.10 The provision of high density development on accessible sites is promoted within 3A.2 of the LP. Boroughs are expected to investigate additional sources of housing capacity and identify further sites, applying higher densities where appropriate (para 3A.10). The LP density provisions of policy 3A.3 and guidance figures of table 3A.2 suggest that on land in a Central area density levels of between 140 – 405 units/ha would be appropriate depending upon the average dwelling size. The H&F Area has a PTAL rating of 5 and is therefore a highly accessible location warranting upper range density assumptions to be utilised. On this basis, there is the potential capacity to accommodate around 8,500 homes on the H&F Area subject to further design, master planning and assessment. Across the whole Earls Court Regeneration Area, (the H&F area and K&C areas) this translates to a total capacity of up to around 10,000 new dwellings.
- 3.11 The residential provision in the proposed H&F area provides the opportunity to resolve a range of housing needs both market and affordable. Whilst the particular quantities, types and locations can, and should be, considered at the appropriate time, the relevance of a strong intermediate housing offer is of particular importance in a generally high value market where the gap between social rents and market provision in its various forms is wide. This can be illustrated in the current market by comparing the typical income required to access lower quartile house prices for the Borough with the income necessary to pay a typical social rent. The Land Registry tables identify that as at Q1 2009 the lower quartile house price for LBHF was £300,000. On a broad basis, this requires an income of about £85,000 to access (at a 3.5 times multiplier); by comparison a typical 2 bedroom social rented property would require an income of about £20,000. This identifies in broad terms the considerable size of the intermediate income gap which illustrates the importance of ensuring that a strong intermediate offer is promoted within the Borough.
- 3.12 A targeted intermediate provision can bring wider choice to both existing residents in social rented provision wishing to secure an equity stake or those in the wider housing market who are unable to afford market prices. This is an important element in respect of LBHF, where only about 1% of existing accommodation falls in the intermediate category.
- 3.13 Additionally, a lack of intermediate choice can force households to migrate out of the Borough in order to seek appropriate accommodation, this exacerbates issues of social polarisation as middle income households leave the area to resolve their
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housing needs leaving only the wealthier homes owners and those generally on lower incomes residing in the social rented stock. Not addressing such an issue would be contrary to the delivery of mixed and balanced communities in accordance with PPS3.

- 3.14 The provision new affordable housing including a response to the estate regeneration proposals offers the opportunity to broaden the overall affordable offer for the wider community and seek to provide a balance of accommodation types. This approach will allow an opportunity to introduce innovation in affordable tenures and secure an important supply of new affordable accommodation in line with the Mayor's recently released draft housing strategy.
- 3.15 On this basis, and given the scale of the proposed redevelopment of the Earls Court Regeneration Area, it is ideally placed to deliver a very significant residential provision in a range of different tenures. Such a proposal can offer the ability to rebalance the existing market by offering increased choice of accommodation type and tenure across the different housing sectors market. Each of these are key targets set within the Community Strategy and Housing Strategy and form a part of the drive within the CSO for improved neighbourhoods which offer better choice to residents. This approach is also afforded considerable support in PPS 3 in its direction for increased provision of new homes and widening options for home ownership.
- 3.16 The provision of around 8,500 homes on the Earls Court Regeneration Area (H&F area) will be of significant benefit to the Borough in meeting the housing targets of the London plan as directed by Policy 3A.2. Furthermore, such a provision of housing will help address the supply/demand pressure which can create house price inflation and the consequent reduction in affordability which this brings.
- 3.17 The previous section of this study highlighted a range of issues which arise as a result of the limited choice in this sector of the market. These include the "silting up" of social rented accommodation as higher income households occupying social rented accommodation have no alternative options available to them unless they enjoy a very considerable income.
- 3.18 A further wider issue linked with a strong intermediate offer lies in the aspiration of LBHF to secure a greater balance of tenures and, in turn, provide a broader mix of household income within its existing communities. Parts of the Borough have a very significant social rented offer with particular wards having social rented proportions

well above the sub regional and London wide average. Whilst this provision is important in meeting affordable needs, additional provision in these locations would run counter to the stated objectives of the CSO to secure a better tenure balance and mixes of income under the improving neighbourhood agenda. This issue is recognised in the LBHF Housing Strategy under the Economic and Social Polarisation challenges which, in turn, have influenced the strategic vision and strategic objectives of the CSO. The improving neighbourhoods agenda of the CSO strategic objectives closely links this to the decisions on the scale of estate renewal which are brought forward over the course of the plan period.

- 3.19 However, even where estate renewal on a large scale is not pursued, strengthening the intermediate offer remains an important element of rebalancing the housing offer and delivering on the mixed and sustainable communities objectives embedded within PPS3.
- 3.20 Whilst the scale and type of intermediate affordable housing that will be advanced on the development will need to be responsive to project viability, the availability of public subsidy, the wider range of planning objectives, and master planning considerations, the site is very well placed to assist in securing the strategic objectives of the CSO in respect of a widened intermediate choice. It is envisaged that a range of intermediate products could be advanced having regard to the emphasis on innovation in the Mayor's draft housing strategy and the scale of the evidenced intermediate gap within LBHF.
- 3.21 Whilst the intermediate offer is part of the wider requirements for affordable housing, it is considered that where there are high numbers of existing social rented numbers in an existing neighbourhood area, the primary objective for housing development and the delivery of affordable housing should be improving neighbourhoods and enhancing home ownership opportunity to residents. On this basis, new provision should be focused on a range of intermediate tenures. This is considered further in section 4.
- 3.22 The Borough identifies the following key themes in relation to housing for the successful delivery of a sustainable mixed income neighbourhood:
- A clean and safe neighbourhood located in an area of opportunity, and where a majority are in employment;

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- Where the housing mix by type size and tenure attract people on a range of incomes and a neighbourhood where getting on does not mean moving out;
 - A neighbourhood where opportunity exists for households to acquire a stake in their homes;
 - Good design which supports tenure blindness and where streets are active and respect their surroundings.

3.23 C&C considers that these can be successfully delivered within a high quality scheme with a layout which includes a range of densities and built forms including as appropriate scope for tall buildings. On this basis, C&C considers that, overall higher density provision can form decent neighbourhoods.

3.24 As considered above, the capacity for the Earls Court Regeneration Area (H&F Area) to deliver residential accommodation provides the LBHF with an opportunity to meet a number of its strategic objectives:

3.25 Firstly, this relates to the provision of new homes, both market and affordable delivering on the requirements of the London Plan and those of PPS3 by securing an available, suitable and achievable provision of new homes in a high quality scheme.

3.26 Secondly, the provision of new homes allows the scheme, subject to viability, to deliver a valuable contribution to the pool of intermediate affordable properties in LBHF. This would have a range of benefits including promoting home ownership opportunities for residents by widening the housing offer, particularly for those on low to middle incomes and would reduce the potential for further polarisation within the housing market by providing housing opportunities to households who would otherwise leave the area.

3.27 Thirdly, the H&F Area will provide significant employment opportunity as part of the development proposals. This will work in parallel with the LBHF objectives on dealing with deprivation and issues of worklessness which occur particularly in parts of the existing social housing estates. The scale of these regenerative impacts will be such that their benefit will flow from the Earls Court Regeneration Area H&F Area into the wider community.

3.28 Fourthly, the proximity of the adjoining council estates of West Kensington and Gibbs Green, and the priority that LBHF attaches to delivering renewal proposals, suggest

that re-provision from these estates can be explored within Earls Court Regeneration Area and sites in the local area.

- 3.29 In conclusion, C&C supports the principles identified by LBHF in terms of the housing objectives of the CSO and considers that the Earls Court Regeneration Area (H&F Area) can deliver strongly on these aspects and the challenges set out within the Housing and Community Strategies of the LBHF.

SECTION 4: THE POTENTIAL TO UNLOCK WIDER REGENERATION

- 4.1 The previous section of this summary study has identified that in respect of the key housing element of the strategic objectives of the CSO the proposals for the Earls Court Regeneration Area (H&F Area) are very well placed to help deliver, particularly in respect of improving neighbourhoods, widening housing choice and facilitating housing provision for the benefit of the Borough. This section considers how these elements can combine with the renewal proposals being developed within the West Kensington and Gibbs Green estates.
- 4.2 The borough has a number of localised issues where very significant proportions of existing social rented accommodation combine with high levels of deprivation to create a range of social challenges. The Council acknowledge in the CSO and within the Community and Housing Strategies that a range of interventions should be considered to tackle these problems. The CSO offers a range of potential interventions from large scale renewal through to small scale qualitative improvements to the properties and the estate environs. Each of these will necessitate a considered approach in the context of the particular estate and particularly the views of existing residents. Therefore, whilst opportunities should exist to advance these within the regeneration policy framework, where such options could be part of a wider development, flexibility is vital to ensure that options can be fully responsive to the needs of existing residents and furthermore be properly and flexibly integrated within adjoining developments.
- 4.3 The proximity of the two existing estates has led to the LBHF concluding that a comprehensive redevelopment for the EC Regeneration Area (H&F Area) is a preferred option within the CSO. This is supported by C&C, provided that the redevelopment of the Estates is carefully integrated with due regard for considerations of delivery timescales, viability, wider planning gain, phasing and master planning. Such an integration of opportunities allows the regenerative benefits of each proposal to be combined and the opportunity for a simplified renewal process to be secured. On this basis, the policy framework should be structured to facilitate

such an alignment, whilst allowing each to be considered taking into account site specific issues and to recognise that the development will be delivered in a phased basis.

- 4.4 Any proposals for provision of social rented housing as part of the renewal programme should ensure that there is no net loss in habitable rooms when compared to the existing stock which is contained within the renewal area. This approach, whilst requiring careful consideration in light of scheme viability, will allow these habitable room numbers to be re-provided across different property types. This will broaden the house type offer and allow the provision of a greater number of family homes.
- 4.5 Such an approach can complement any intermediate housing offer, allowing existing residents who choose to do so and who fulfil the relevant criteria the opportunity to access different tenure forms including options for home ownership.
- 4.6 Overall the redevelopment proposals offer the opportunity to combine new mixed use development, including residential accommodation, employment, leisure and retail with a programme of renewal. Together these will deliver against the strategic objectives of the CSO to improve neighbourhoods, broaden the housing offer, assist the council in reducing polarisation and worklessness and provide a more mixed and balanced community.
- 4.7 A programme of renewal and redevelopment of the Earls Court Regeneration Area would individually provide considerable regenerative benefit to both the local neighbourhood and the wider area.

SECTION 5: CONCLUSIONS

- 5.1 There is considerable unmet demand for new housing – both affordable and market – within LBHF evidenced by a combination of house price pressure, population growth projections and waiting list numbers. The Earls Court Regeneration Area (H&F area) has considerable capacity for housing provision and this, coupled with its ability to deliver opportunities for estate renewal, warrant it being promoted as a strategic option within the emerging LBHF CS, with this status being developed as an integral part of a supplementary planning document promoted as part of the wider Earls Court Regeneration Area planning framework.
- 5.2 The provision of a significant housing component on the Earls Court Regeneration Area (H&F Area) will facilitate improvements to tenure balance, house type choice and quality, with each assisting in delivering a more mixed and balanced community. The work undertaken to date including density assumptions suggests that in the order of approximately 8,500 homes can be accommodated within the Earls Court Regeneration Area (H&F Area).
- 5.3 C&C supports the emphasis on the creation of a mixed and balanced community with an improved intermediate housing offer being the major component of any affordable housing provision.
- 5.4 C&C supports the view that redevelopment of the Earls Court Regeneration Area H&F Area provides a unique opportunity to bring comprehensive regeneration proposals for the Earls Court Regeneration Area as a whole.
- 5.5 C&C supports flexibility being incorporated within the emerging policy framework to allow the Earls Court Regeneration Area scheme proposals to be considered in light of evidence, master planning, cross Borough boundary working, community consultation and development viability.
- 5.6 The policy provisions of the LBHF CS should allow for the various components of the overall comprehensive regeneration vision for the wider Earls Court Regeneration Area to be advanced independently with due regard paid to the wider context. This will allow for sufficient certainty of delivery and flexibility in the LBHF CS policy framework for the Earls Court Regeneration Area whilst acknowledging the

importance of the relationship with any proposals advanced within the wider context, including the North Fulham Regeneration Area.



SUMMARY HOUSING STUDY

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KEY POINT SUMMARY

- This document has been prepared by RPS and First Base for Capital & Counties on behalf of Earls Court & Olympia Group (EC&O)
- The Earls Court Regeneration Area land within Royal Borough of Kensington and Chelsea (“RBKC”) is designated as a strategic site.
- Comprehensive redevelopment of the Regeneration Area could deliver a considerable number of good quality homes.
- Application of the density guidance within the London Plan suggests the part of the Earls Court Regeneration Area land which lies within RBKC can accommodate a minimum of around 1500 residential dwellings.
- The capacity of the part of the Earls Court Regeneration Area within RBKC and the scale of demand for housing – both affordable and market – mean the site can make an important contribution to meeting RBKC’s housing requirements.
- Detailed scheme proposals, including an appropriate mix of affordable and market accommodation, would be considered in light of evidence, master planning, cross border working and development viability.

SECTION 1: INTRODUCTION

- 1.1 This document has been prepared by RPS and First Base for Capital & Counties on behalf of Earls Court & Olympia Group (EC&O).
- 1.2 This document relates to the Earls Court Regeneration Area land, part of which lies within RBKC. It supports the proposed strategic site allocation of the Earls Court Regeneration Area as a high density mixed use scheme which will offer both regeneration benefits and wider housing choice for residents in RBKC and West London. Whilst the existing and emerging policy framework for the London Borough of Hammersmith and Fulham (“LBHF”) will apply to the Regeneration Area which falls in LBHF, this document only considers the policy proposals of RBKC. It is understood that each Borough intend to work together with the promoters to ensure a complementary joined up policy framework in respect of this overall strategic allocation across Borough boundaries.
- 1.3 The comprehensive redevelopment of the Regeneration Area for a high quality, sustainable, mixed use scheme provides real opportunity to provide the area with a new sense of place, new homes, jobs, open space and community facilities. The proposed regeneration project has the ability to deliver a considerable number of good quality new homes in a central location within West London. The potential scale of the project allows for a very significant contribution to housing supply both affordable and market for RBKC & LBHF with delivery in accordance with national, regional and local planning objectives.
- 1.4 This document supports the strategic site allocation and highlights the importance of delivering a mixed income community on a scheme of this scale and identifies the wider regenerative benefits that new homes will bring to the area. Such a strategic site allocation will assist both RBKC and the adjoining LBHF in meeting the challenge of housing delivery whilst addressing identified needs both market and affordable.
- 1.5 The level of demand for accommodation in a range of tenures warrants a new residential provision within the Regeneration Area of some 9000 – 10000 new homes, with a minimum of around 1500 of these properties being accommodated on the area of the site lying within RBKC, subject to master planning and further assessment. This will make a substantial and valuable contribution to the housing numbers required within the Borough and wider sub region.
- 1.6 The conclusions are that the significant scale of this redevelopment proposal, coupled with the estate renewal opportunities in LBHF, place the scheme in an excellent position to both meet the need for market and affordable accommodation, and provide an opportunity to deliver considerable regenerative benefits to RBKC, LBHF and the wider West London sub region.

SECTION 2: PLANNING POLICY ASSESSMENT OVERVIEW

a) National Policy

2.1 National planning policy on housing has been the subject of extensive review and consultation over recent years, culminating in the publication of Planning Policy Statement 3: Housing (PPS3) in November 2006. PPS3 provides the national planning policy framework for the delivery of Central Government's housing policy objectives; it sets out the Government's key housing policy goal as being to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live (paragraph 9).

2.2 To achieve this overriding goal, four key objectives are sought and can be summarised as:

- Increasing the supply of housing;
- Delivering quality and choice for all;
- Widening opportunities for home ownership; and
- Creating sustainable, inclusive and mixed communities.

2.3 Specifically in relation to affordable housing, the Government sets out its commitment to providing a range of housing to meet the needs of people with varying incomes.

“The Government is committed to providing high quality housing for people who are unable to access or afford market housing, for example vulnerable people and key workers as well as helping people make the step from social-rented housing to home ownership” (paragraph 27).

2.4 In planning at site level, PPS3 also requires that the amount and type of housing sought should be established through the creation of a robust evidence base including the completion of a Strategic Housing Market Assessment. A further key principle (paragraph 29) is that the deliverability of targets set in local policy frameworks should also be tested to verify that such targets are balanced against risks to delivery and the creation of mixed and sustainable communities.

2.5 Providing opportunities for home ownership is a consistent theme of government policy and the planning system is identified as having an important role in delivering intermediate tenure housing. The benefits of intermediate housing are recognised:

“a sufficient supply of intermediate affordable housing can address the needs of `key workers and those seeking to gain a first step on the housing ladder, reduce the call on social-rented housing, free up social-rented homes, provide wider choice for households and ensure that sites have a mix of tenures” (paragraph 29)

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- 2.6 PPS3 also seeks to ensure that Local Planning Authorities ensure that they possess a rolling 5 year supply of housing sites (paragraph 54).
- 2.7 Delivering Affordable Housing, the sister guidance document to PPS3, provides guidance on the role of local authorities in the delivery of affordable housing. It states that Local Authorities are required to ensure that existing housing provision be balanced carefully with future housing demand. Delivering Affordable Housing also requires that new housing developments contain a good mix of tenures (paragraph 12).
- 2.8 The thrust of PPS3 is therefore to ensure that policies facilitate the delivery of sufficient high quality housing which meets needs, encourages home ownership and delivers on the Governments sustainable community agenda.

b) London Plan

- 2.9 The regional planning position is provided by the London plan (“LP”) which seeks to provide for significant new housing provision (350 pa in RBKC) to be secured in order that the expected population growth for the sub region can be accommodated. Further additional supply is vital to reduce affordability pressure which has arisen where imbalance between demand and supply exists. This is a particular issue for parts of the RBKC where house price pressure is exacerbated by a shortage of supply.
- 2.10 The LP seeks to secure the provision of mixed and balanced communities (policy 3A.9) and provide improved housing choice in terms of mix and types of new provision (policy 3A.5) and promotes intensification of housing provision through higher density development where sustainability is secured (policy 3A.2).
- 2.11 Policy 3A.10 requires Boroughs to seek the maximum reasonable amount of affordable housing when negotiating individual private residential and mixed-use schemes, having regard to the London wide target that 50% of all new homes should be affordable to achieve a London wide tenure split of 35% social rented units and 15% intermediate of the overall total. The mayor has stated his intentions to amend this policy approach with a move to individually agreed Borough targets and a revised direction in respect of intermediate and social rented provision.
- 2.12 The LP requires Boroughs to encourage rather than restrain overall residential development and to reflect individual site circumstances thus requiring targets to be applied flexibly, taking into account individual site costs, the availability of public subsidy and other scheme requirements.

-
- 2.13 LP housing policy is supplemented by a Housing SPG which was published in November 2005 which confirms that whilst affordable housing should normally be provided as an integral element of a residential development, off site provision of affordable housing may be acceptable where there are demonstrable benefits to be gained by providing new units in a different location (Paragraph 18.17). An alternative site or sites should be identified which would enable more appropriate provision of affordable housing provision and up-front delivery.
- 2.14 The mayor has recently issued for consultation a draft housing strategy. This strategy sets out an approach to secure the provision of high quality homes which offer a better mix of types including innovations in tenure choice in order that the aspirations and housing needs of Londoners are met. This is an important document for housing provision in London and will provide added to the policy framework of the LP and SPG.
- c) **RBKC**
- 2.15 The RBKC Unitary Development Plan 2002 (as amended 28 September 2007) (the “UDP”) promotes residential uses (policy H2) encourages higher densities (policy H9) and seeks appropriate dwelling mix within new developments (policy H19). These aims have been developed within the emerging core strategy documentation with the strategic sites paper re-stating the strategic objectives which are proposed to supplement the Council’s Core Strategy vision. ‘Diversity of Housing’ is considered a key theme and this encompasses the need to secure housing which caters for a variety of housing needs and to ensure that it is adaptable and of a high quality. These themes broadly reflect the tenet of regional and national policy in terms of the London plan and PPS3.
- 2.16 The national and regional policy frameworks therefore promote housing development with an emphasis on high quality provision which meets needs and assists in the creation of mixed and sustainable communities. The UDP encourages higher densities and an appropriate dwelling mix with the emphasis within the emerging strategic objectives of the CS on delivery of diverse housing which meets needs.

SECTION 3: STRATEGIC STATUS OF THE DEVELOPMENT PROPOSALS

- 3.1 The wider Earls Court Regeneration area comprises an area extending to some 27 hectares and includes a wide range of existing uses including two existing council estates. The part of the Earls Court Regeneration Area land lying within RBKC totals 7.06 hectares.
- 3.2 The overall regeneration scheme for the whole of the Earls Court Regeneration Area which is being promoted has significant potential to facilitate proposed estate renewal on a large scale, provide approximately 9,000 to 10,000 new homes including an appropriate mix of affordable and market accommodation, whilst delivering a range of wider business uses and provide regenerative benefits both locally and sub regionally. Overall, the scheme is of London-wide significance and will deliver real housing benefits for the RBKC, as well as the LBHF. In the RBKC Core Strategy, the strategic site status should be enhanced to reflect that this scheme can represent a strategic allocation for housing within the RBKC CS for delivery of a minimum of around 1500 homes on the land within RBKC as part of a wider potential allocation across both RBKC and LBHF of approximately 9,000 to 10,000 new homes.

SECTION 4: HOUSING NEED AND DEMAND

- 4.1 The delivery of a comprehensive scheme will require a detailed master planning approach to confirm the appropriateness and viability of such a comprehensive approach. This process will inform the final location, density and types of affordable and market housing proposed. In this context, it is important that the framework for the Earls Court Regeneration Area land incorporates sufficient flexibility to allow an appropriate range of proposals to be developed within it.
- 4.2 As identified above, the London Plan has identified a strategic target for the RBKC in terms of housing numbers of 350 dwelling per year. This flows from the scale of population growth, employment opportunity and the need to balance supply of housing with demand to avoid affordability pressures. The LP expects Boroughs to seek to exceed these figures (3A.2). It is apparent from the Annual Monitoring reports from the last three years that provision of new homes has fallen behind this strategic target, with figures of 152, 273 and 216 for completed units. Furthermore the net number of consented dwellings for 2007/08 lies 89 dwellings short of the 350 target and whilst this will in part be due to the difficult development economics of the past 18 months, this ongoing shortfall of provision will be creating a degree of 'backlog' pressure for new accommodation. This backlog must be addressed as part of the trajectory and strategic allocations process to ensure that demand and supply pressures can be appropriately met over the life of the CS.
- 4.3 The GLA engaged Experian to analyse retail floor space requirements as part of the ongoing London Plan evidence base. This work completed in March 2009 included an up to date assessment of population growth figures for London and the Boroughs. These suggest that the population of RBKC will increase by some 13,700 residents to 2026 which compares to the existing LP prediction of 16,000 over the same period. This coupled with evidence that household sizes continue to fall across London (Greater London Strategic Housing Market Assessment 2008 paragraph 3.3) ("London SHMA") indicates the headline drivers for additional housing provision remain. Against this it is not surprising that the London SHMA concludes that some 366,800 new homes (market and affordable) need to be provided over the next 10 years to resolve existing and emerging housing needs.
- 4.4 This is a considerable requirement which should be properly reflected in strategic site allocations with the implication that a failure to deliver will result (particularly in the context of RBKC) in a widening gap between supply and demand with the price pressure which results. In order to secure the principles of mixed income communities advocated clearly within PPS3 and in the LP, it is important to secure a consistent and significant delivery of both market and affordable new homes.

- 4.5 The provision of high density development on accessible sites is promoted by policy H9 of the UDP and within LP policy 3A.2. Boroughs are expected to investigate additional sources of housing capacity and identify further sites, applying higher densities where appropriate (para 3A.10). The LP density provisions of policy 3A.3 and guidance figures of table 3A.2 suggest that on land in a Central area density levels of between 140 – 405 units/ha would be appropriate depending upon the average dwelling size. The part of the Earls Court Regeneration Area land which lies within RBKC has a PTAL rating of 5 and is a highly accessible location. Therefore, taking the upper range density assumptions outlined in the London Plan table there is the potential to accommodate between 1,500 to 2,850 homes on the land within RBKC subject to further design, master planning and assessment. Across the whole Earls Court Regeneration Area, there is capacity and scope to accommodate the provision of between 9,000 and 10,000 new dwellings.
- 4.6 The residential provision in the proposed development area provides the opportunity to resolve a range of housing needs both market and affordable. Whilst the particular quantities, types and locations can, and should be, considered at the appropriate time, the relevance of a strong intermediate offer is of particular importance in a generally high value market where the gap between social rents and market provision in its various forms is wide. The potential to improve existing affordable housing as part of estate regeneration proposals on the Earls Court Regeneration Area offers the opportunity to broaden the overall affordable offer for the wider community and seek to provide a balance of accommodation types. This approach will allow an opportunity to introduce innovation in affordable tenures and secure an important supply of new affordable accommodation in line with the Mayor's recently released draft housing strategy.
- 4.7 On this basis, and given the scale of the proposed redevelopment of the Earls Court Regeneration Area, it is ideally placed to deliver a very significant residential provision in a range of different tenures. Such a proposal can offer the ability to rebalance the existing market by offering increased choice of accommodation across the different housing sectors market.
- 4.8 As stated above, it would be premature to identify type, tenure, mix and locations of accommodation within the wider site at this stage, these are matters which should be considered in light of master planning considerations and cross Borough working as part of the redevelopment of Earls Court Regeneration Area.
- 4.9 The breakdown of accommodation types their locations and tenure would be subsequently considered in light of the following considerations:
- Preparation of applicable Local Development Documents including joint Supplementary Planning Documents.
 - Master planning for the Regeneration Area and consideration of other policy objectives

-
- Implications associated with the Estate Renewal proposals and associated consultations
 - Due regard for development viability and phasing
 - New provision which assists in redressing existing housing imbalances within the community.
 - Aspirations to secure a truly mixed income and sustainable community.

4.10 In this respect, the scheme will be well placed to meet evidenced needs in accordance with the policy framework. Further this will secure a diverse range of housing to a high standard that will harmonize with the local and wider regeneration benefits of the scheme aligning with the CS Strategic Objectives.

SECTION 5: CONCLUSIONS

- 5.1 It is appropriate that the Regeneration Area is afforded status as a strategic site within the allocated sites of RBKC. This reflects its scale, regeneration benefits and its significant role in meeting the evidenced demand for housing. The Regeneration Area has the ability to deliver a significant provision of high quality residential accommodation considerably in excess of that currently identified. The high demand and need for residential accommodation in both the sub region and Borough supports the potential for the overall scheme to deliver up to 10,000 new homes, with a minimum of around 1500 of these located within the area of RBKC.
- 5.2 The scale of the Earls Court Regeneration Area and the range of land uses which are incorporated require flexibility within the policy framework to ensure that an appropriate range of proposals can be subsequently considered. In respect of housing, the type, tenure, mix and location of properties should therefore be afforded a degree of flexibility to allow the scheme to remain responsive to needs, demand, viability and master planning considerations to secure a mixed income and tenure development to provide a sustainable overall new community.

EARLS COURT REGENERATION AREA CORE STRATEGY EVIDENCE BASE SUMMARY INFRASTRUCTURE AND WASTE STUDY

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JUNE 2009



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SECTION 1

1. KEY POINTS SUMMARY

- 1.1 This study has been prepared by Hoare Lea, Arup and WSP Environmental Ltd and provides an evidence base for infrastructure capacity, structural deliverability and waste management considerations in relation to the proposed indicative land use budget which could emerge in the Earls Court Regeneration Area.
- 1.2 The conclusions of the reviews undertaken indicate that:
 - 1.2.1 there is a good availability of service infrastructure in the immediate network areas and there are no significant issues in terms of infrastructure capacity which would prevent a regeneration scheme of the scale of the indicative land use budget coming forward within the Earls Court Regeneration Area; and
 - 1.2.2 there are no insurmountable structural issues or unusual challenges in relation to existing infrastructure and ground conditions which would prevent a regeneration scheme of the scale of the indicative land use budget coming forward.
- 1.3 In responding to the reference in RBKC's Strategic Sites DPD to Earls Court potentially providing waste treatment facilities to meet the GLA's apportionment targets, the study also concludes that the Earls Court Regeneration Area is not suitable for managing waste generated by activities elsewhere in the Royal Borough of Kensington and Chelsea (RBKC) or within west London because, inter alia:
 - 1.3.1 It does not fall within one of the preferred type of locations identified in the London Plan as suitable for waste facilities to meet borough apportionment requirements; and
 - 1.3.2 It is not suitable in terms of environmental and amenity impact.
- 1.4 Waste arising from the Regeneration Area will be dealt with as part of a sustainable waste strategy, including a focus on waste minimisation and recycling.



SECTION 2
SUMMARY INFRASTRUCTURE IMPACT ANALYSIS
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2. INFRASTRUCTURE IMPACT ANALYSIS

2.1 INTRODUCTION

The impact of the indicative land use proposals on the Regeneration Area for the current and future utility infrastructure networks is considered in the following sections.

The impact analysis comprises desk top studies of the existing utility infrastructure within the boundaries of the Earls Court Regeneration Area and considers the new service capacities necessary to support a development of the scale set in the indicative land budget.

In consultation with key asset providers, both current and future services provision are identified in principle. It is expected that a large development in a dense urban area will result in offsite network enhancements. These will be more fully defined as a masterplan for the Regeneration Area comes forward.

The future utility analysis recognises the requirement for a coherent and holistic approach to a sustainable energy strategy. This will be developed in parallel with sustainability aims and targets for the Regeneration Area.

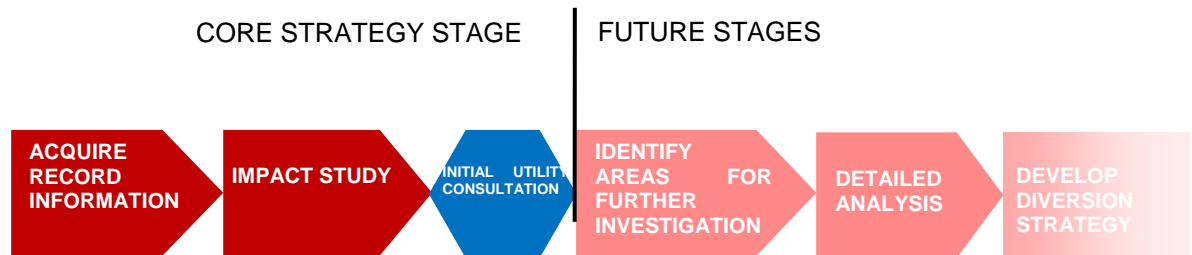
2.1.1 Indicative Land Use Budget

The following indicative land use budget figures are the bases for this report:

User Type	Low to High (m ²) (GEA)
Office	400,000 to 550,000
Residential	850,000 to 900,000
Retail	40,000 to 55,000
Hotel	45,000 to 65,000
Leisure	20,000 to 30,000
Exhibition / Culture / Other Destination	20,000 to 50,000
Education / Other Social and community Facilities	10,000 to 20,000
Total	1,385,000 to 1,670,000

2.2 Local Infrastructure Overview and Impact Analysis

Process diagram:



Records of all service providers' equipment have been acquired and mapped electronically to site plans. Land uses have been assumed in accordance with the indicative land use budget and an initial impact study has been completed.

2.2.1 Asset Owners

The following key service providers have been identified as providers of services with assets affected by the Regeneration Area indicative land use budget:

Service	Asset owner
Electricity	EDF Energy
Water	Thames Water
Gas	National Grid
Drainage	Thames Water
Telecoms	British Telecom
	O2
	Vodaphone
	Virgin Media

Using the received record information, high level discussions with respect to diversions have been had with the asset owners.

2.2.2 Key Impacted Infrastructure

Key infrastructure within and around the Regeneration Area comprises:

- (a) Six 11kV EDF owned sub-stations affected by the comprehensive redevelopment, some of which feed properties outside of the development area where supply will need to be maintained. No primary subs exist in the area.
- (b) There are a considerable number of strategic utility services which run along Warwick Road at the frontage of the Regeneration Area. Any development

emerging in the Regeneration Area will make due consideration of these services and, where unavoidable, route new supplies provided via alternative routes to reduce the impact on Warwick Road.

- (c) It is noted that the services on Warwick Road that cross over the railway bridge are at a reduced depth.

2.3 **Local Infrastructure Overview and Impact Analysis**

- 2.3.1 National Grid have an underground district gas pressure reducing station at the rear of Empress Place and a large diameter low pressure distribution pipe running along Thaxton Road.
- 2.3.2 A number of Telecoms services both cabled and mobile exist in and around the Regeneration Area, most are end of line services requiring disconnections only.

2.3.3 Key Note Plans

(a) Electrical Services (EDF)

A number of 11kV/400V local distribution transformers exist within Regeneration Area and the surrounding boundary. A strategy to retain supplies to properties outside the Regeneration Area will be developed in the future stages.

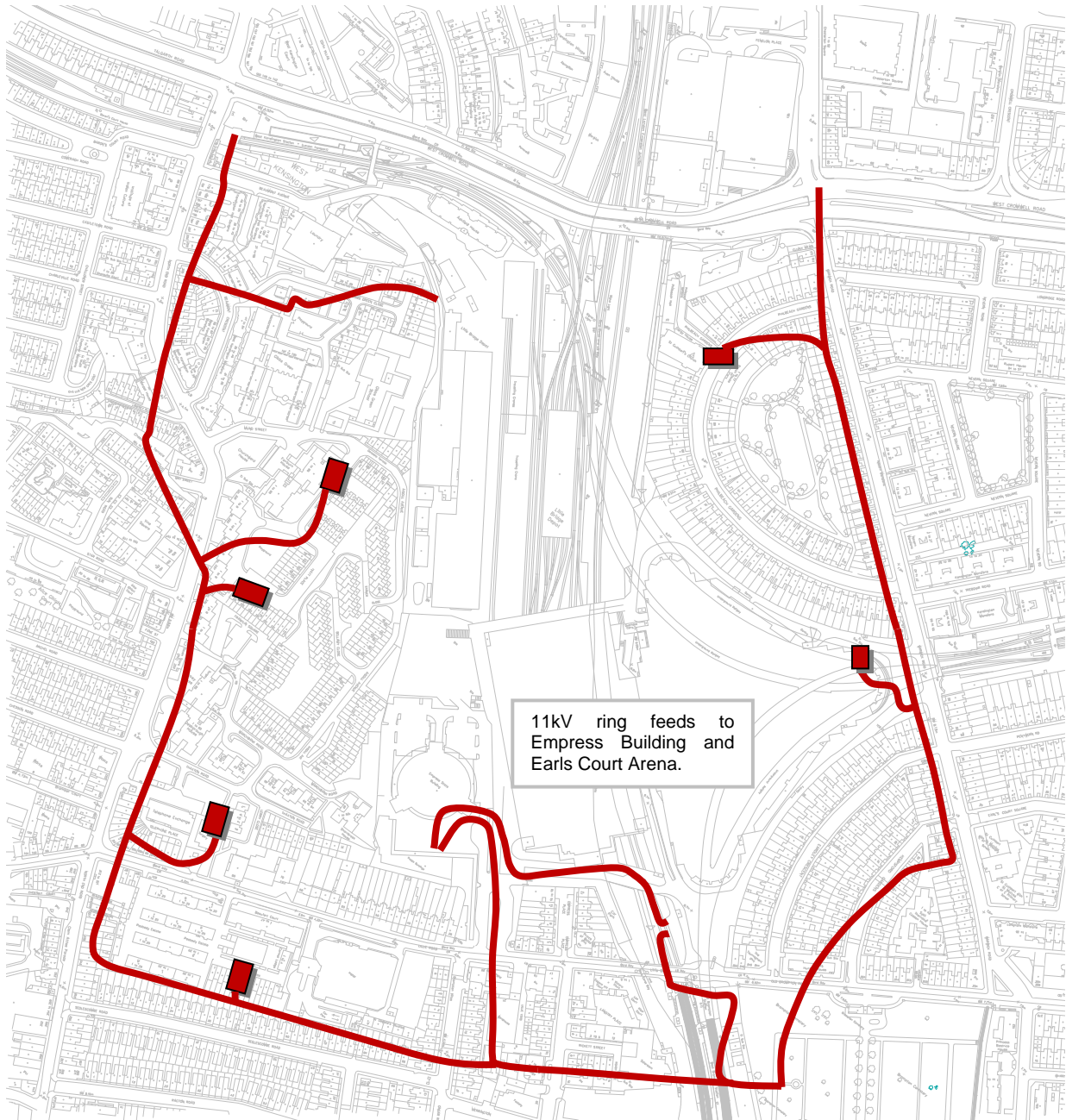
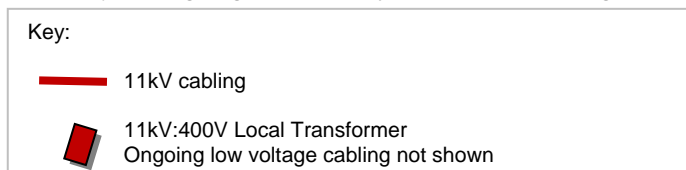


Illustration is provided to give a generic overview only of infrastructure around the regeneration area.



(b) **Potable Water Services (Thames Water)**

Large distribution mains run to the east and south of the Regeneration Area. Utility records indicate only local feeds within the Regeneration Area, much of which would be made redundant organically with the scheme.

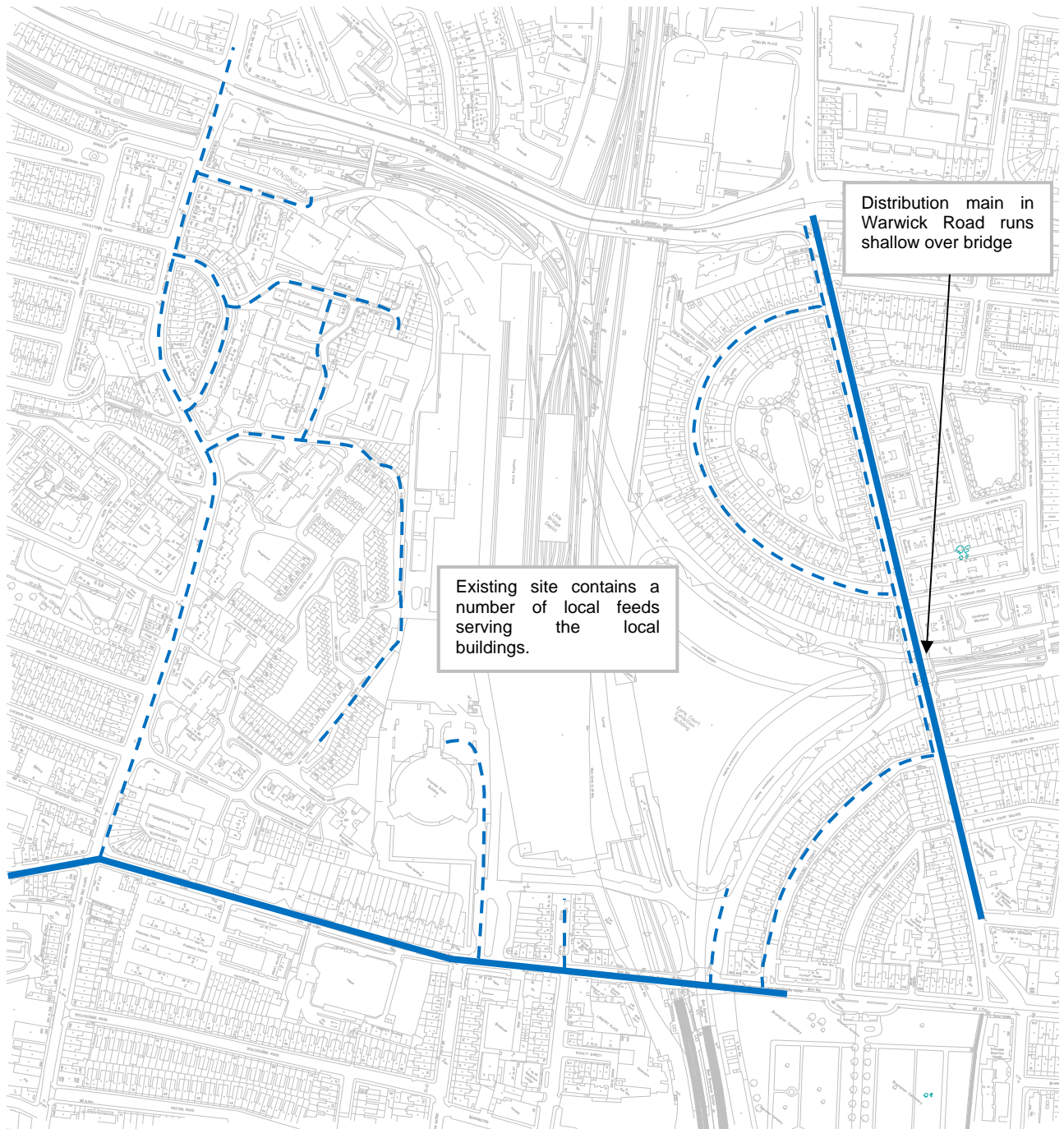
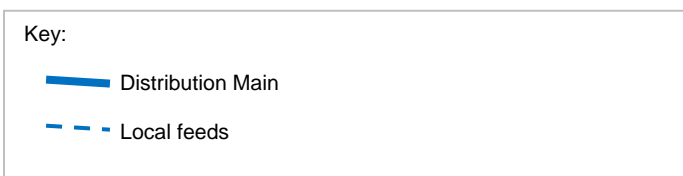


Illustration is provided to give a generic overview only of infrastructure around the regeneration area.



(c) **Gas Services (National Grid)**

A large Medium pressure main runs from the east to the south of the Regeneration Area. A pressure reducing station exists adjacent to the Empress Building.

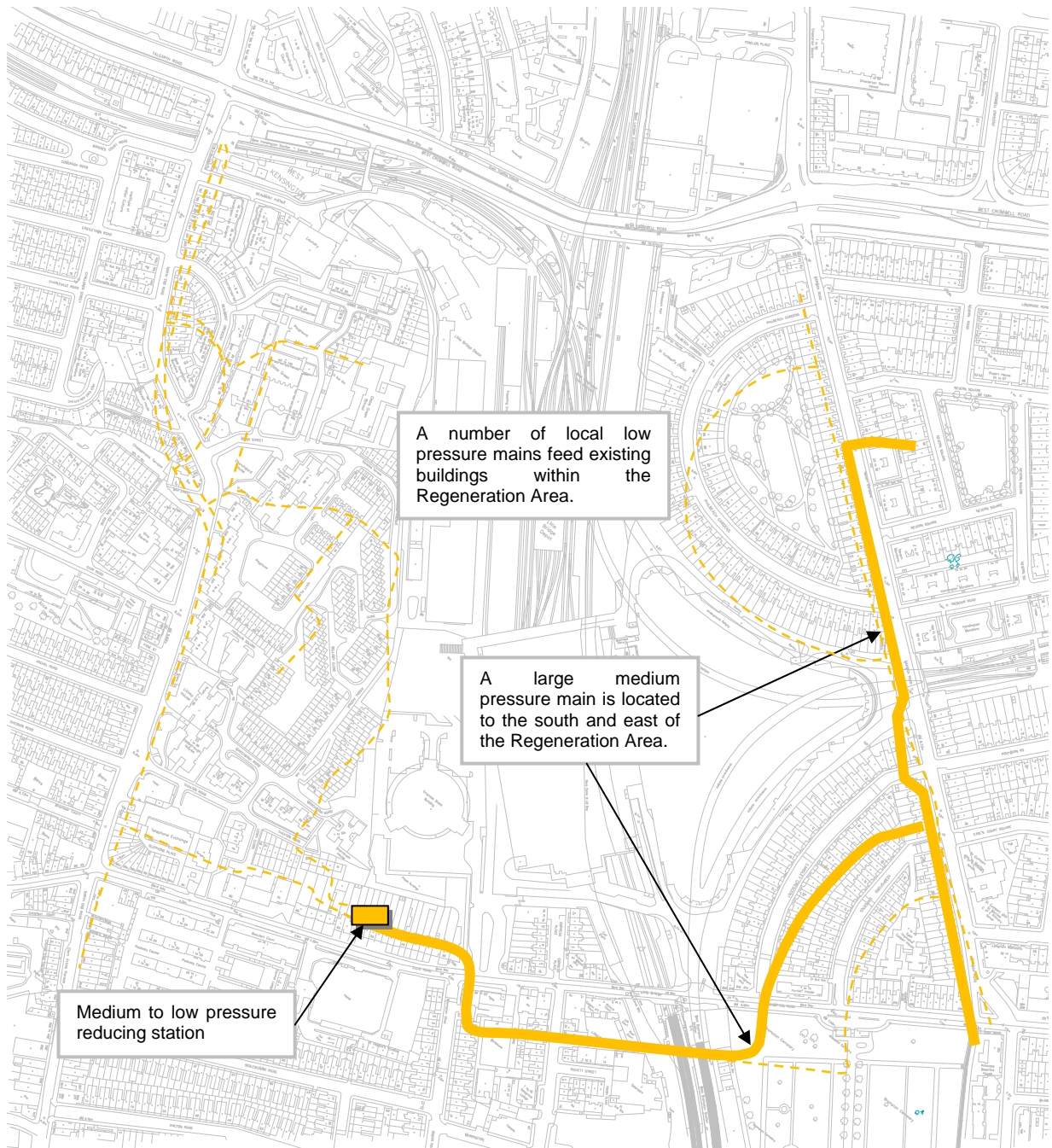
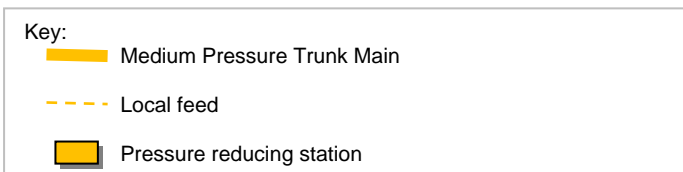


Illustration is provided to give a generic overview infrastructure around the regeneration area.



(d) **Drainage Services (Thames Water)**

Counter's Creek sewer under Warwick Road has been highlight as at its capacity by Thames Water.

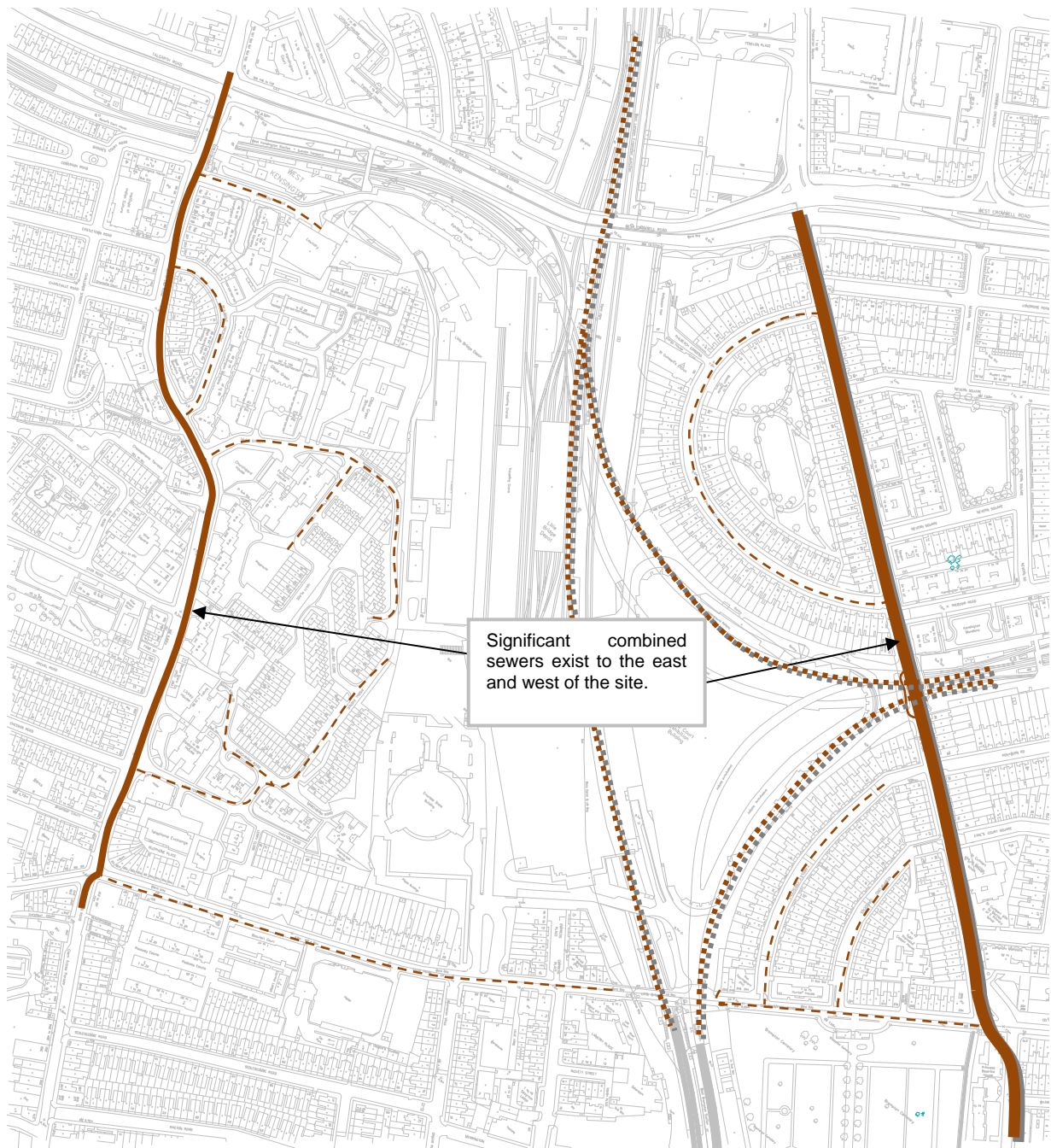
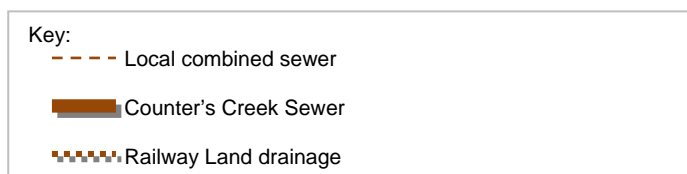


Illustration is provided to give a generic overview only of infrastructure around the regeneration area.



(d) **Telecom Services (BT, Thus, MCI, Virgin, Mobile)**

A number of Telecom operators have infrastructure to and crossing the Regeneration Area. Much is associated with supplying the Earls Court Exhibition Centre itself.

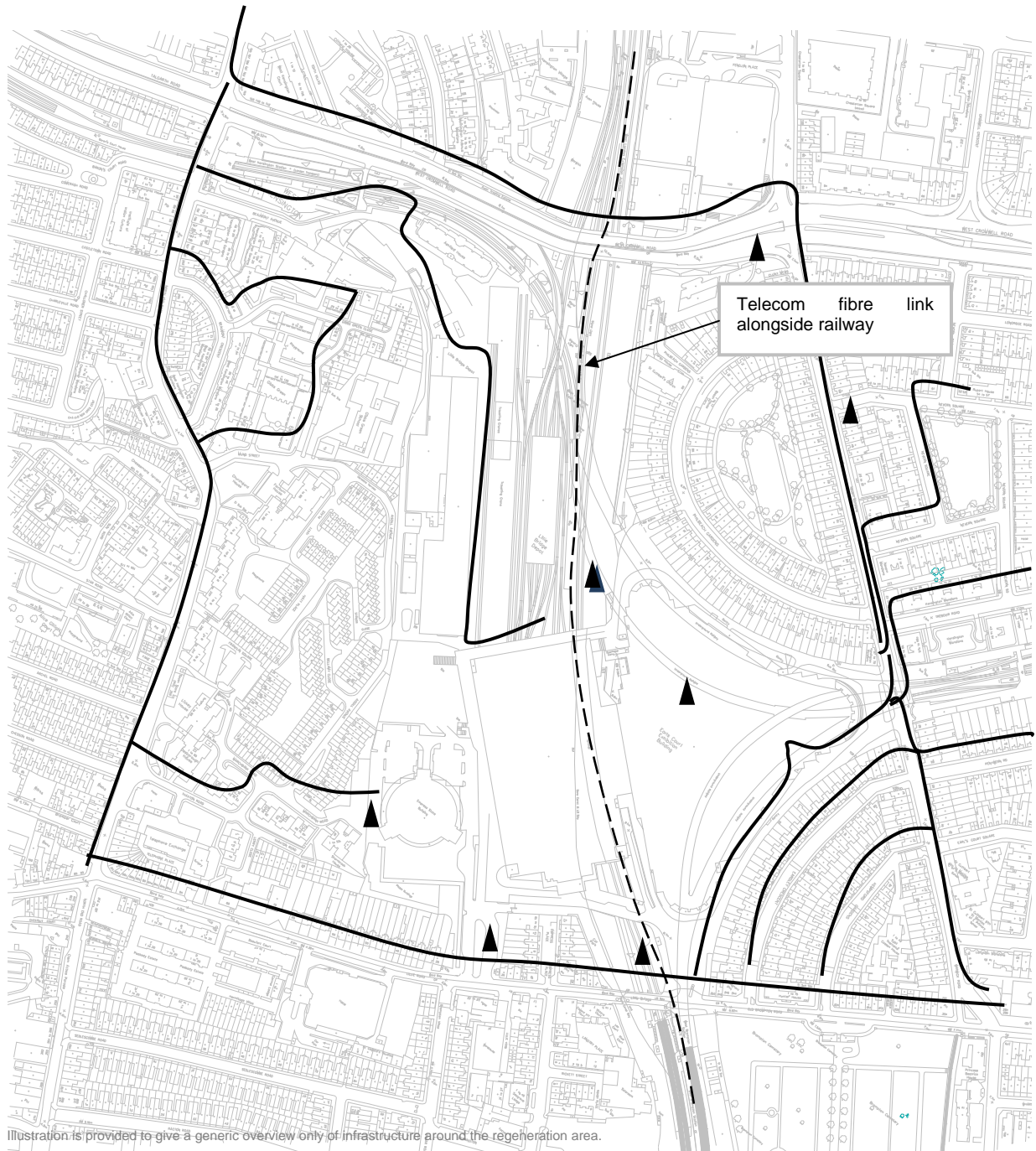
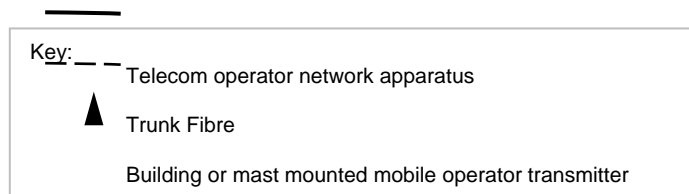


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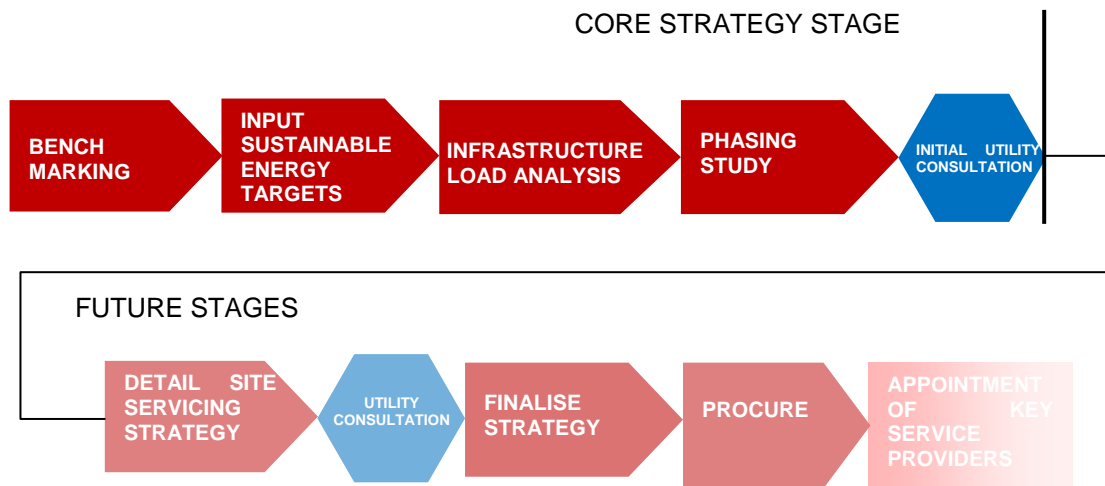


2.3.4 Key Point Summary

Consultations with the utility asset owners have identified a number of services that will be impacted by the potential development in the Regeneration Area. Whilst principles of diversions have been established, further detailed discussions with the asset owners, as a Masterplan for the Regeneration Area comes forward, will seek to develop a strategy to relocate, disconnect or divert. Ensuring properties retain their supplies with minimal disruption is paramount to the strategy. The investigation work undertaken to date has identified smaller than expected number of affected services for a development of the size set out in the indicative land use budget. This relatively low number of strategic services requiring diversion enhances the Regeneration Area's development potential.

2.4 Wider Infrastructure Impact analysis

Process diagram:



Establishing considered energy and water bench marking figures that include both diversified maximum demands and anticipated sustainable energy targets is vital in accurately forecasting the requirements of the new utility infrastructure. Within this demand profile model is the offset of peak demands between the various land uses.

An early demand analysis has been completed and the principal utility service providers have been consulted. The principles of the perceived off site infrastructure reinforcements have been established in these negotiations. Feedback from these early discussions has in turn been fed back into the demand model and reviewed against a land use budget notional development phasing plan.

Thames Water has advised that the Counter's Creek sewer under Warwick Road is at capacity and will be subject to further discussion. Consultation is ongoing with Thames Water to develop options and a strategy to ensure the Regeneration Area puts little or no further demands on this infrastructure. Thames Water is investigating options to improve the situation.

2.4.1 Parallels with Sustainable design

The aims and targets for onsite energy and water reduction, energy generation, identified in Hoare Lea's Sustainable Framework Statement (June 2009) will in turn impact positively on utility demands. However, the necessity for a reliable energy and water source will remain a key strategy for the Regeneration Area as a masterplan comes forward.

2.4.2 Key Point Summary

Studies to date have highlighted a good availability of service infrastructure in the immediate network areas. To support the full consequential demand from the proposed land use budget, some upgrades will be required to existing key major distribution points within the vicinity of the Regeneration Area.

2.5 Phased implementation

It is considered that existing infrastructure can support a good proportion of the indicative land use for the Regeneration Area. However, some reinforcements will be necessary to ensure delivery of the full land use budget. The nature of these reinforcements, their phasing and timing will be agreed through detailed discussion with relevant parties as a masterplan for the Regeneration Area is developed.

Implementation of upgrades will need to be well managed in recognition of the guidelines surrounding the Traffic Management Act 2004. In order to minimise, wherever practically possible, the disruption caused by road works, co-ordinating timings of upgrades will be agreed in due course.

2.6 Loading Analysis

The below table identifies the approximate perceived loads on Electricity, Gas and Water services against the indicative land use budget. Figures are estimates for initial utility consultations only and do not include for reductions obtained through sustainable design. Figures identified are peak demands.

UTILITY	EXISTING DEMAND	NEW DEMAND
ELECTRICITY	13MW	68MW
GAS	24MW	106MW
WATER	330M ³ /day	3,600M ³ /day

2.7 Conclusion

As a masterplan and development scheme for the Regeneration Area is progressed, full and detailed modelling of all the key utilities will be carried out. At this stage, discussions have raised no significant issues that would stand in the way of a regeneration scheme of the scale set out in the indicative land use budget. The already well serviced area enhances the Regeneration Area's development potential.

Ongoing works will follow best practice guidelines, work closely to guidance given by groups such as the National Joint Utilities Group and participation in local New Roads and Street Works Act utility co-ordination meetings.

SECTION 3
STRUCTURAL DELIVERABILITY
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3. **STRUCTURAL DELIVERABILITY**

3.1 **Summary**

This study reviews the site history and structural and ground conditions in relation to the Earls Court Regeneration Area and provides a preliminary assessment of the deliverability of any regeneration scheme which could come forward within the Regeneration Area.

A number of railway lines cross the Regeneration Area but modern design and construction techniques mean that it is possible to build over or near to them whilst maintaining conventional standards of safety, environmental impact and sustainability.

In summary, the Regeneration Area does not pose any unusual challenges and there are no insurmountable structural issues which would preclude development.

3.2 **Site History**

The site was agricultural in the 1800s with a canal running through it which was later infilled to build a railway link. This later became part of the West London Line (originally called the West London Extension). There was additional railway development including the Metropolitan District Line and the Piccadilly Line, along with adjacent rail sidings and buildings including the Lillie Bridge Depot. The land was derelict and was used to host a fairground prior to development.

A review of historical mapping indicates the presence of 'brick fields' along the western boundary of the site. As a result of this land use, it is possible that some of the locally occurring gravels and clay may have been extracted from the site.

In 1935 work began on the Earls Court Exhibition Centre which opened in 1937. Earls Court Two opened in 1991 and spans the West London Line, now part of the London Overground network. The Exhibition site has not significantly developed since this time. The A4 Cromwell Road Bridge was constructed during the Second World War and had been completed by 1944. A bridge has been located on Lillie Road since the construction of the canal.

The surrounding area has steadily developed with a mix of housing, retail and industrial units since the arrival of the railways.

3.3 **Site Conditions**

The Light Detecting and Ranging (LIDAR) survey indicates that the average site level is between 3mOD and 5mOD with rail cuttings as deep as -3mOD. There is a general slope from east to west, with levels along Warwick Road between 7.2mOD and 7.5mOD dropping to between 5.0mOD and 4.1mOD from northwest to southeast, along North End Lane approx 600m to the west.

Ground conditions within the Regeneration Area comprise level to very gently sloping Kempton Park river terrace gravels unconformably overlying London Clay. Although the 1:10,000 geological maps show no Made Ground, except at the centre of the Earls Court Exhibition Building, the majority of the boreholes show Made Ground where probable earthworks have taken place. There is a possibility of local deepening of Made Ground due to previous gravel and clay extraction.

The generalised succession of strata is Kempton Park Gravels over London Clay, Lambeth Group, Thanet Sands and Chalk.

The River Terrace Gravels vary in thickness up to 6.6m and the London Clay is shown to have a thickness of at least 51m at the site. The site surface has been extensively disturbed by building and transportation developments since the 1860s.

The Kempton Park Gravels are highly permeable and form a minor aquifer that rests on the impermeable London Clay formation below. Drainage of the site was formerly by Counters Creek, which flowed to the southeast and is now diverted into a sewer under Warwick Road.

The whole of the Regeneration Area is located behind the River Thames's flood defences. Just over half of the Regeneration Area is within Flood Zone 3a, as defined by the Environment Agency. This is the area located north west of the existing Earls Court Exhibition Building. Flood Zone 3 is an area with a notional high probability of flooding, e.g. during a flood event with a greater than 0.5% chance of occurring annually (1 in 200 year event). However, the EA's classification does not take into account the presence of the flood defences which will clearly significantly reduce any flood risk. The same applies to many sites across London.

A small part of the Regeneration Area is located in Flood Zone 2 (medium probability of flooding), and the remainder (in and around the Exhibition Building) is located outside the fluvial floodplain (eg within Flood Zone 1).

3.4 **Existing Infrastructure**

Historical foundations and sub-structure remains are likely to exist within the Regeneration Area. The principal obstructions include Earls Court Exhibition Centre, Earls Court Two and the Lillie Bridge Depot.

Earth retaining structures are also present under Earls Court Two, along the interface between tunnel and overland components of the District Line and along the southern edge of District Line track between Ashfield House and West Kensington Station.

There is extensive rail track and associated property owned by Transport for London and London Underground Limited within the site boundary. The District Line, Piccadilly Line and West London Line all intersect the site. West Kensington Station is within the site boundary and both Earls Court Station and West Brompton Station are adjacent to the Regeneration Area boundary. In addition to this, the A4 Cromwell Road A4 Bridge is a trunk road and therefore partially under control by TFL.

Other tunnels (such as MOD secret tunnels and the Thames Water Ring Main) may exist within the Regeneration Area.

There are also basements and foundations from the existing structures, primarily from the two main exhibition buildings; Earls Court Exhibition Centre and Earls Court Two.

3.5 **Deliverability**

There are no structural deliverability issues within the Regeneration Area which are unusual for development in London. Development over or alongside operating railways does not present any insurmountable problems - both Network Rail and LUL have clear regulations and guidance for this. The structural issues that need to be resolved have all been addressed successfully elsewhere.

Anticipated ground conditions do not preclude the use of shallow or deep foundations and solutions could be identified which are suitable for use within the Regeneration Area.

3.6 **Development Process**

As a masterplan for the Regeneration area comes forward further site specific studies and ground investigations would be undertaken to examine issues relating to archaeology, contamination and any potential for flooding. For example, ground investigation would be undertaken in order to inform the design of foundations, retaining walls and basements.

The process of demolition and construction and the associated mitigation measures would be agreed with the relevant authorities at the appropriate time.

SECTION 3

WASTE MANAGEMENT INFRASTRUCTURE

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4. WASTE MANAGEMENT INFRASTRUCTURE

4.1 Introduction

- 4.1.1 This study considers waste management issues relevant to the Earls Court Regeneration Area and addresses the reference in RBKC's Strategic Sites DPD to Earls Court potentially providing waste treatment facilities to meet the GLA's apportionment targets
- 4.1.2 Current planning policy requires development to manage its own waste arisings where possible in a sustainable manner. Requirements could include providing adequate space for sustainable management of residual and recycle materials generated from the development and/or providing mechanisms for segregation of food and organics.
- 4.1.3 In accordance with policy it is envisaged that any development to be promoted within the Earls Court Regeneration Area would be able to make adequate and sustainable provision as appropriate and feasible to deal with waste generated by development of the order set out in the indicative land use budget.
- 4.1.4 The Regeneration Area is not suitable (either in policy or amenity impact terms) for the location of a waste facility for managing arisings generated elsewhere in RBKC or the wider West London area.
- 4.1.5 This study reviews very briefly the relevant waste policy drivers, identifies the current and planned waste infrastructure in RBKC and provides a preliminary assessment of the unsuitability of the Earls Court Regeneration Area to locate a waste management facility.

4.2 Waste Policy Drivers

- 4.2.1 The London Plan requires that London becomes 85% self sufficient in waste management by 2020. Achievement of this target will require new waste management infrastructure to complement that which already exists.
- 4.2.2 However, the London Plan also reveals that there is unlikely to be sufficient capacity/sites to enable all boroughs to be self-sufficient in their own right. As a consequence, in order to enable London to meet its strategic self sufficiency target, there is a need to apportion waste that cannot be managed within boroughs with insufficient capacity, to other London boroughs.
- 4.2.3 To deliver these objectives, the Mayor of London forecasts that about 215 hectares of additional waste management capacity, not currently in waste use, will need to be identified in London from 2005-2020.
- 4.2.4 The Mayor has estimated that RBKC's share of such waste will amount to 309,000 tonnes per annum by 2020, requiring 3.9 hectares of land to manage this waste. RBKC has secured 2 hectares and needs to identify another 2 hectares.
- 4.2.5 RBKC is seeking to meet its waste apportionment figure either through allocating sites in its Borough or through joint working with other London boroughs. Small waste facilities within new development (to sort, store and

bulk wastes generated by that development) could count towards RBKC's apportionment requirements.

4.3 **Current Waste Management in RBKC**

4.3.1 Within West London waste disposal is carried out by the Western Riverside Waste Authority, a partnership between RBKC, Wandsworth Borough Council, and the London Boroughs of Hammersmith and Fulham and Lambeth. Individual authorities are responsible for waste collection within their own Borough.

4.3.2 The Western Riverside Waste Authority and its constituent Councils referred to as "the Partnership" is responsible for collecting and treating 500,000 tonnes of municipal waste per annum. The Partnership forecasts the following breakdown in energy recovery, recycling, composting and landfill for the period 2010/11.

- For Energy Recovery: 344,695,
- Recycled & composted 136,395
- Landfill 38,299

4.3.3 From 2011/12, the Western Riverside Waste Authority will transport non-recyclable municipal waste down the River Thames to the Belvedere energy-from-waste plant in Bexley.

4.3.4 The Joint Municipal Waste Management Strategy prepared by the Partnership identifies that recyclables will be managed by 'fully utilising existing bulk bay infrastructure which exists at the Western Riverside Waste Authorities transfer station together with the 84,000 tonne per annum MRF at Smugglers Wharf'.

4.3.5 The current waste management sites in RBKC include:

- Council's Central Depot - utilised as a vehicle depot.
- Denyer Street Depot - street cleansing depot located in the South of the Borough. It currently accommodates 25 SITA street cleansing staff and 10 cleansing and enforcement officers and their manager. There is also a recycling centre located in the yard that is well used by local residents.
- Tavistock Depot - street cleansing depot and houses recycling banks.
- Walmer Road Depot - street cleansing depot.
- Cremorne Wharf - transfer station.

4.4 **Relevant Policies for Selection of Waste Sites**

4.4.1 PPS10 states that "in deciding which sites and areas to identify for waste management facilities, waste planning authorities should assess their suitability for development against each of the following criteria:

- the extent to which they support the policies in this PPS;
- the physical and environmental constraints on development, including existing and proposed neighbouring land uses;

- the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential;
- the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport” (para 21).

4.4.2 Policy 4A.23 of the London Plan sets out the criteria for the selection of sites for waste management and disposal. It states the following: *“London boroughs should in their development plan documents identify sites and allocate sufficient land for waste management and disposal, employing the following criteria:*

- Proximity to source of waste.
- The nature of the activity proposed and its scale.
- The environmental impact on surrounding areas, particularly noise emissions, odour and visual impact and impact on water resources.
- The full transport impact of all collection, transfer and disposal movements.
- Primarily using sites that are located on Preferred Industrial Locations or existing waste management locations.”

4.4.3 The Regeneration Area does not fall within one of the preferred type locations identified in the London Plan as suitable for waste facilities and it is not an existing waste management location.

4.5 **Unsuitability of Earls Court Regeneration Area for Waste Management Facilities**

4.5.1 The Regeneration Area would perform badly when assessed against the locational criteria in PPS10.

4.5.2 The Regeneration Area sits within an area which is primarily housing and it is adjoined by conservation areas (such as the Philbeach Gardens Conservation Area) and Brompton Cemetery, a Royal Park and Conservation Area. There are likely to be potential adverse impacts on sensitive receptors by way of visual intrusion, air emissions, dust, odours, vermin and birds, noise and vibration and litter.

4.5.3 Typically with waste management facilities, there would be 3 peak periods during a day with waste collections 5.5 times a week throughout the year. These movements will add traffic to the network at times when it is at its busiest. It would increase congestion and have adverse environmental consequences.

4.6 Key Points Summary

- 4.6.1 A waste management facility within the Regeneration Area would adversely affect its redevelopment potential and ability to make a significant contribution to RBKC's strategic housing requirements.
- 4.6.2 There have been no discussions between RBKC, LBHF and the owners of the Regeneration Area in relation to the possible allocation of land within the Regeneration Area as a waste management facility. In view of the owners' desire to promote a comprehensive regeneration and improvement scheme the allocation is based on an unrealistic assumption. In any event, the Joint Waste Management Strategy provides that adequate provision has been made for RBKC to meet its waste management requirements until 2032 without the need for additional sites.
- 4.6.3 In the context of PPS10 and London Plan policy, the Regeneration Area is not a suitable location for a waste management facility for, inter alia, the following reasons:
- (a) It does not fall within one of the preferred type locations identified in the London Plan as suitable for waste facilities.
 - (b) It is not an existing waste management location.
 - (c) It is not a preferred industrial location.
 - (d) Waste management facilities would be likely to have an unacceptable environmental impact on the surrounding area
 - (e) Waste management facilities would act as a traffic generator for a significant number of trips by HGVs whatever the size of the facility with an adverse impact on traffic conditions



CAPITAL & COUNTIES

**EARLS COURT
REGENERATION AREA**

**CORE STRATEGY
EVIDENCE BASE**

**SUMMARY OF
SUSTAINABILITY
APPROACH**

JUNE 2009

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1.0 KEY POINTS SUMMARY

The location size and surroundings of the Earls Court Regeneration Area present opportunities for delivering large scale sustainable development characterized by sustainable design and construction with the potential for adopting community energy, water, and waste solutions where appropriate.

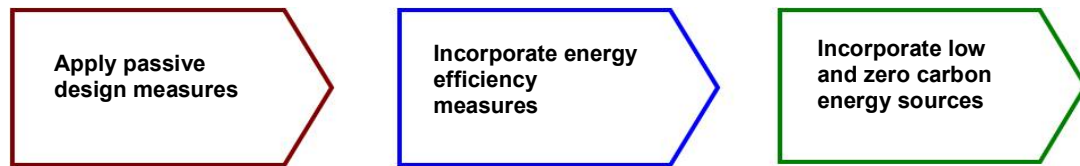
This study is intended to summarise key points of the approach to sustainability which would guide development coming forward in the Earls Court Regeneration Area and focuses on those aspects of sustainability which endeavour to mitigate the effects of and adapt to climate change and to promote the prudent use of natural resources by sustainable consumption and production.

The importance of sustainable design and construction is increasingly the focus of national, regional and local policies and planning guidance which aims to reduce energy use, reduce carbon emissions, promote the development of renewable energy resources and consider climate change impacts when reviewing the location and design of developments. Within this context, and having regard where relevant to PPS1 *Delivering Sustainable Communities*, PPS *Planning and Climate Change*, PPS22 *Renewable Energy*, the Mayor of London's Supplementary Planning Guidance on Sustainable Design and Construction 2006, the Mayor's Energy Strategy 2004 and other relevant local policies it is intended that the key approach to sustainability within the Regeneration Area would be:

- **adopting an energy hierarchy to allow future development to minimise carbon emissions and energy consumption;**
- **seeking to allow the implementation of a sustainable water use and drainage strategy;**
- **capitalising on green spaces and water features to help improve micro-climate;**
- **developing a sustainable materials procurement strategy;**
- **aiming to minimise the production of waste and encourage recycling.**

2.0 ENERGY

As part of the proposed approach to sustainability, it is anticipated that any regeneration scheme which would be promoted within the Earls Court Regeneration Area would seek to allow future development to minimise carbon emissions and energy consumption by following a simple energy hierarchy: firstly reduce demand through passive design, then supply energy efficiently, and finally supply energy from low and zero carbon energy source(s):



It is intended that the proposals evolving through masterplanning and the planning application process would give due consideration to building form, massing and orientation in order to optimise the benefits of the climatic conditions of the Regeneration Area. The proposals would seek to allow solar access to buildings and to external spaces throughout the Regeneration Area to make use of the benefits of natural light and passive heating, and to enhance the environment for the occupants and users of the development.

Central to the strategy would be the aim to implement an efficient energy infrastructure which could service the buildings and could allow future development to have reduced dependency on the national grid and to reduce demand for fossil fuels.

It would be intended to facilitate the efficient integration of a number of low and zero carbon sources, and any development to be promoted in the Regeneration Area could investigate the potential of utilising sources such as solar energy and biomass to serve the buildings and thus reduce dependency on fossil fuels. The facility to adopt local energy production and distribution, if proved feasible, would provide flexibility in the future in terms of adaptation to alternative energy sources and changes in heating and cooling needs due to, for example, changes in use and in climate.

3.0 WATER AND DRAINAGE MANAGEMENT

As part of the proposed approach to sustainability, a water strategy will be developed for the Regeneration Area which will seek to allow the implementation of a sustainable water use and drainage strategy.

The approach should be developed using best practice benchmarks and future standards (such as BREEAM, Code for Sustainable Homes, CEEQUAL, as appropriate) in order to establish targets and guidelines for the performance of the water and drainage systems to be integrated within the Regeneration Area including for example the provision of sustainable urban drainage systems. Systems able to adapt to climate change (for example by accommodating greater peak rainfalls) would be encouraged where feasible.

The feasibility of implementing sustainable water measures such as grey water and rainwater recycling to serve internal building and external irrigation requirements would be considered. The potential of local borehole water abstraction for use within the Regeneration Area would be evaluated too.

4.0 CAPITALISING ON GREEN SPACES

As part of the proposed approach to sustainability it is intended to maximise the potential which green spaces could bring, where and if proposed within the Regeneration Area.

As development emerges through the masterplanning process it is hoped to encourage the provision of green/brown roofs, gardens and also water features. These could both contribute to enhancing biodiversity and facilitate adaptation to climate change by contributing to a local cooling effect, providing areas of comfortable micro-climate under summer temperatures which are expected to increase due to climate change.

5.0 MATERIALS

As part of the proposed approach to sustainability, a sustainable materials procurement strategy will be developed for the Regeneration Area. Consideration will be given to the following issues:

- Use of standardised products where feasible and optimum use of pre-fabrication to reduce waste generated within the Regeneration Area;
- Consideration of recycled and reclaimed materials;
- Minimising where feasible embodied energy in construction;
- Maximising local sourcing of materials where feasible.

6.0 WASTE MANAGEMENT

As part of the proposed approach to sustainability, a waste strategy will be developed for the Regeneration Area, which will aim to minimise the production of waste and encourage recycling during construction and operation of the buildings. The strategy will be developed by considering the principles of the Waste Hierarchy:



The following issues should be considered when setting aspirations for future proposals:

- Incorporate separate dedicated storage space;
- Implement waste management plan;
- Facilitate the adoption of a site wide recycling scheme if feasible.

7.0 CONCLUSION

The location size and surroundings of the Earls Court Regeneration Area present opportunities for delivering large scale sustainable development characterized by sustainable design and construction with the potential for adopting community energy water and waste solutions where appropriate.

Within the context of the relevant policies and guidance relating to sustainable development, key aspects of the approach to sustainability would be:

- Adopting an energy hierarchy to allow future development to minimise carbon emissions and energy consumption;
- Seeking to allow the implementation of a sustainable water use and drainage strategy;
- Capitalising on green spaces and water features to help improve micro-climate;
- Developing a sustainable materials procurement strategy;
- Aiming to minimise the production of waste and encourage recycling.

Capital & Counties on behalf of Earls Court and Olympia Group

EARLS COURT REGENERATION AREA CORE STRATEGY EVIDENCE BASE: SUMMARY SOCIO-ECONOMIC STUDY

JUNE 2009

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EARLS COURT REGENERATION AREA: SOCIO-ECONOMIC STUDY

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EARLS COURT REGENERATION AREA: SOCIO-ECONOMIC STUDY

1 KEY POINT SUMMARY

- 1.1 The socio-economic background is important when considering new development potential. This paper reviews a number of London socio-economic methodologies and forecasts from Experian and the GLA of relevance to the development potential of the Earls Court Regeneration Area.
- 1.2 These figures indicate that by 2026:
- between 0.80 and 1.09 million more people will live in Greater London, with about 34,800 to 40,000 of these in the combined LBHF and RBKC area
 - there will be a rise of between 381,000 and 912,000 jobs in London as a whole and for RBKC and LBHF combined, an increase of 19,000 to 51,000
- 1.3 These projections point to continued growth in the capital's economy and in the boroughs concerned. Moreover, even the lower range of population and job estimates remain consistent with the indicative land-use budget for this project.

Table 1 Indicative Land-use Budget

User Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000
Residential	850,000 to 900,000
Retail	40,000 to 55,000
Hotel	45,000 to 65,000
Culture, Destination and Leisure Uses	35,000 to 50,000
Education and Other Social and Local Community Facilities	10,000 to 20,000
Total	1,380,000 to 1,640,000

2 INTRODUCTION AND METHODOLOGY

- 2.1 This report has been prepared for Capital & Counties on behalf of Earls Court and Olympia Group as an evidence base for the Core Strategy submissions for the Earls Court Regeneration Area for the RBKC and LBHF Core Strategies.
- 2.2 In planning and project assessment, it is important to have a view of future socio-economic trends. Changes in underlying local population and employment will be key determinants of the success of any scheme. For this reason, forecasts of economic and demographic trends are widely used as an evidence base for development.
- 2.3. There are a number of sources for predictions. The most freely available are official estimates in the public domain. For population, the government's statistical services (the Office for National Statistics) provide detailed population at national, regional and local levels. These projections use traditional demographic methods to model birth and death rates, and migration flows.
- 2.4. In this study, we have used the Greater London Authority's (GLA) results from its Data Management and Analysis Group (DMAG). These figures use the ONS as a baseline, but also adjust for other factors, most notably house-building plans. As these are the main policy benchmarks, used widely in the London Plan and other strategic work, this is the most appropriate official benchmark.
- 2.5. Commercial forecasts do not have the same authority as public sources, but they have other advantages. Most important is the frequency that they are updated. Official projections are at best annually reviewed, while commercial forecasters may provide updates on a quarterly or bi-annual basis.
- 2.6. This is less of an issue for demographics than economics, where events tend to move faster and where using the latest data is most critical to accuracy. But EU expansion, and sharp rises in worker inflows to the UK in the last decade, have led to regular reassessments of the prospects for London's population. This illustrates the need to use the most up-to-date forecasts, whenever possible.
- 2.7. In this work, Experian is used as the main commercial source. This brings timeliness as mentioned (the latest vintage is spring 2009¹), but also consistency and independence. Experian also provide our employment and retail spending figures, all derived from a suite of inter-connected econometric models. This is a key benefit, as it allows the linkages between population, jobs and spending to be captured.
- 2.8. Moreover, for local economic forecasts, there are no publicly available sources. The Treasury produces regular macroeconomic views, but regional and borough level estimates are only provided by commercial sources. The GLA has used Volterra in its work. Their approach has used Experian estimates as an input, then models on the basis of historic trends. Experian's long-term view also includes a structural labour market model, using supply variables such as workforce, skills and industrial mix.
- 2.9. Different methodologies will produce variations to outcomes. There is a need to take into account variables due to forecasts made at different times. Events (such as the credit crunch) and data revisions need therefore to be looked at in context when forecasting.

¹ The population figures are a GLA-Experian hybrid released in March 2009

EARLS COURT REGENERATION AREA: SOCIO-ECONOMIC STUDY

- 2.10. There are relatively few local-level forecasters and their figures are usually not available to analyse, so there is no independent comparative assessment of their accuracy. The consistency, independence and timeliness of Experian figures is therefore key, and we believe that their methodology and assumptions are sound.
- 2.11. We have supplemented the Experian employment figures with GLA data and carried out some comparison analysis as part of this study.

3 POPULATION

- 3.1 In the context of LBHF and RBKC and its surrounding area, the key reference point is the Regional Spatial Strategy (RSS), which forms the basis of all other sub-regional plans. The regional planning document for London is the Mayor's London Plan² (LP), produced by the Greater London Authority (GLA), giving a comprehensive spatial strategy for the next decade or more, including socio-economic assumptions.
- 3.2 The initial version of the LP was produced between 2004 and 2006 and was reviewed and amended in 2008. The replacement of Mayor Livingstone in 2008 led a review (Planning for a Better London³) which is being consulted on. This is broadly supportive of the previous framework, but important changes in commitments on, for instance, affordable housing are expected. Until the final results are published, however, the current LP will remain the spatial development strategy benchmark for the capital.
- 3.3. The LP gives explicit assumptions of London's population in its first chapter. The GLA's DMAG provided the population figures for the report and their latest update was released last year⁴. On the basis of a 2006 mid-year figure of between 7.45-7.54 million, a rise to between 8.54–8.86 million in population is expected in London's by 2026 – an increase of 1.1 to 1.3 million people (or 15-18%).
- 3.4. The GLA/DMAG also produce borough level projections, again using a high-low range (see table 2). These indicate that both boroughs grow at a slightly slower rate than the London average, with Hammersmith and Fulham the faster of the two. In total on the low case, the rise in borough population is just over 40,000 (or 12%).
- 3.5. The DMAG approach is not just a traditional demographic one based on birth and death rates and migration. As housing is a major strategic consideration for the GLA, these projections also include development inputs, estimating the impact of new homes on the population.
- 3.6. This in part explains the differences between high and low population profiles. The low forecast is based on actual and expected housing development, while the high view includes an assumption that the high levels of international immigration of the last five years will continue. The size and variability of this component of the London forecast helps explain the variability of recent population projections. But the DMAG in its report recommend that “the Low projection be used for detailed analysis and planning at borough and ward levels”⁵.

² <http://www.london.gov.uk/thelondonplan/docs/londonplan08.pdf>

³ <http://www.london.gov.uk/mayor/publications/2008/07/plan-better-london.jsp>

⁴ <http://www.london.gov.uk/gla/publications/factsandfigures/DMAG-briefing2009-02-round-projections.pdf>, note that these figures are slightly higher than those used in the latest amended LP document.

⁵ Op cit, page 2-3.

EARLS COURT REGENERATION AREA: SOCIO-ECONOMIC STUDY

Table 2 Demographic forecasts

Population			2006	2026	difference	% change
London millions, RBKC/LBHF 000s						
GLA/DMAG/LP	London	Low	7.45	8.54	1.09	15
		High	7.54	8.86	1.32	18
	RBKC	Low	165	181	16.3	10
		High	167	188	21.3	13
	LBHF	Low	174	198	24.3	14
		High	176	206	29.8	17
Total Low			338	379	40.6	12
GLA-Experian March 2009	London		7.46	8.27	0.80	11
	RBKC		164.8	178.5	13.7	8
	LBHF		175.2	196.3	21.1	12
	Total		340	375	34.8	10

Sources: GLA, ONS, Experian

- 3.7. Experian forecast bi-annually and also take as their basis official ONS population projections. These are a starting point, with the numbers then adjusted for migration caused by economic factors and also for policy considerations, including house-building.
- 3.8. Table 2 reports a hybrid GLA-Experian demographic profile produced from a recent report on retail floorspace⁶. These assumptions were agreed jointly with the GLA, rather than produced by Experian alone, but are of recent vintage. This study assumes a conservative demographic profile, similar to the GLA/DMAG Low case recommended for planning. The increases for both London (0.8 million new people) and combined RBKC and LBHF (34,800) are lower than the GLA benchmarks.
- 3.9. In summary, population projections from Experian and GLA indicate a range of between 0.80 and 1.09 million extra people in Greater London and between 34,800 to 40,000 for a combined LBHF and RBKC by 2026.

⁶ <http://www.london.gov.uk/mayor/publications/2009/03/consumer-expenditure.jsp>, Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, March 2009

4 EMPLOYMENT

4.1. In the LP, an additional 912,000 jobs were forecast to be created between 2006 and 2026, taking employment to 5.5 million in the capital. About two-thirds of the new jobs (an estimated 605,000) were expected to be generated by the financial and business services sector. These figures are attributed to GLA/Volterra and dated 2007⁷.

Table 3 London employment forecasts

London population Millions	2006	2026	%	Change/ 000s	Difference from GLA/000s
London Plan/GLA-Volterra	4.59	5.50	20	912	
Experian, Spring 2009	4.63	5.01	10	381	-531

Sources: GLA, ONA, Experian

4.2. Table 3 sets these official projections against the employment benchmarks from Experian’s latest regional forecasts (spring 2009). These indicate that by 2026, less than half as many jobs are created than in the GLA figures, though there is still a 10% (or 380,000) increase in levels over the period.

4.3. While a less benign economic environment explains some of the change in views over the next five years, other factors are also important. Most important, Experian assume a less strong medium to long term trend, with annual growth rates of between 0.5 to 0.7% a year. This compares with a GLA/Volterra profile of job creation at almost 1% a year.

4.4. Differences partly reflect methodology. Experian’s structural models will be limited by the high long-term employment rates in London and supply constraints, so that growth rates will tend to decline over time. By contrast, GLA/Volterra base their projections on a continuation of recent trends in job demand. These differences explain about half of the gap between current Experian and LP estimates for London.

4.5. Experian’s latest view also implies that there is a permanent job deficit in the recovery, a structural not cyclical loss. This is less easy to isolate, but may reflect an assumption that financial services could be somewhat less dynamic in future. This view is consistent with the current uncertainty about the prospects for banking, and promises of tighter regulation of credit and finance.

4.6. The GLA also released a full breakdown of the LP employment forecasts at the borough level, based on their triangulation method⁸. These projections are derived from the top level Volterra figures and shown with the spring 2009 Experian equivalents in table 4.

⁷ GLA use Experian as the source of their employment data, but the projections are by Volterra Consulting, http://www.london.gov.uk/mayor/economic_unit/docs/wp_20_employment.pdf

⁸ See http://www.london.gov.uk/mayor/economic_unit/docs/current-issues-note-13.pdf

Table 4 Borough employment forecasts

Borough employment 000s		2006	2026	%	Change	Difference from GLA
London Plan/GLA	RBKC	139	152	9	13.0	
	LBHF	127	165	30	38.0	
	Total	266	317	19	51.0	
Experian, Spring 2009	RBKC	130	139	7	8.7	-4
	LBHF	130	140	8	10.5	-28
	Total	260	279	7	19.1	-32

Sources: GLA, ONS, Experian

- 4.7. Experian forecast a total of 19,000 headcount jobs created across the boroughs by 2026. This implies a much faster rate of expansion than for London as a whole, but still indicating a shortfall on the GLA figures.
- 4.8. For the GLA, the rapid job creation in LBHF is particularly critical, explaining 38,000 of the 51,000 new jobs created. LBHF has experienced exceptionally rapid job creation in the recent past and the GLA is projecting this forward. This raises methodological issues and whether potential labour supply constraints have been considered (as the much lower borough population figure implies a large increase of in-commuting). The GLA RBKC figure is also higher than the Experian forecast, though the gap is much less significant.
- 4.9. In summary, employment projections for Greater London to 2026 suggest a rise of between 381,000 and 912,000 jobs, and for RBKC and LBHF combined, an increase of from 19,000 to 51,000.

5 SUMMARY

- 5.1 Table 5 summarises the various socio-economic assumptions from Experian and the GLA. As noted, there are some differences in predictions given the varying start points, different methodologies and underlying assumptions, and the long time horizon considered.
- 5.2 The gap on population is relatively modest (at 6,000 people over 20 years) given the potential range of views in this area. Experian London employment forecasts have been somewhat depressed by the economic downturn and by a re-evaluation of prospects in the financial sector. There are a range of projections for borough job creation, particularly in LBHF.
- 5.3 The key overall trends are, however, all positive and, the projections all point to continued growth in the London economy as a whole and in the RBKC and LBHF. The Earls Court Regeneration Area presents a key opportunity to help deliver this growth in a sustainable way.

Table 5 Experian view and the London Plan compared

<i>Change 2008 to 2026</i>	Hammersmith and Fulham	Kensington and Chelsea	Total
London Plan population (2008)	24,300	16,300	40,600
Population (GLA-Experian 2009)	21,100	13,700	34,800
London Plan jobs (2008)	38,000	13,000	51,000
Jobs (Experian 2009)	9,000	10,000	19,000

- 5.4 The resident population statistics are used as key inputs in the King Sturge retail and leisure analysis. The workplace jobs figures are similarly important in calculating day-time retail contributions and form the basis of the potential office work-force for the development. These estimates are in turn used to inform the Land-use budgets for each use class (see Table 1).

King Sturge LLP
June 2009

Earls Court Regeneration Area

Core Strategy Evidence Base: Townscape and Tall Buildings Summary Study

Professor Robert Tavernor Consultancy, June 2009

Tavernor

Earls Court Regeneration Area

Core Strategy Evidence Base: Townscape and Tall Buildings Summary Study

Professor Robert Tavernor Consultancy, June 2009

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1.0 Key point summary

- 1.1 This Study has been prepared by the Professor Robert Tavernor Consultancy. It considers the townscape context and the potential for the Earls Court Regeneration Area to accommodate tall buildings.
- 1.2 Any development coming forward within the Regeneration Area would achieve high levels of urban design and architectural treatment respecting its townscape context. A masterplan and subsequent scheme would be worked up within established policy guidance and the terms of recognised good practice, consistent with planning policy. The masterplan would consider layout principles, urban grain, massing envelopes, architectural typologies and urban form and would identify the specific parts of the Regeneration Area where tall buildings are appropriate.
- 1.3 It is recognised that tall buildings can be a sustainable response to accommodating growth and to achieve high density development.
- 1.4 The study concludes that the Earls Court Regeneration Area can be an appropriate location for tall buildings. The main reasons include:
 - Due to its size and accessibility there is scope for the Regeneration Area to establish its own architectural identity and accommodate tall buildings;
 - The Regeneration Area provides the opportunity to deliver a new economic cluster of related activities. Tall buildings are in principle supported in such locations by planning policy;
 - Tall buildings, as a coherent and integral part of a masterplan for the Regeneration Area ,could act as a catalyst for regeneration, renewal and economic activity in their own right, consistent with planning policy objectives; and
 - Tall buildings would mark the Regeneration Area as a destination in its own right and contribute to the skyline of London as a whole.

2.0 Introduction

- 2.1 The Professor Robert Tavernor Consultancy has produced this Townscape and Tall Buildings Summary Study for Capital & Counties on behalf of the Earls Court & Olympia Group. It considers how any regeneration scheme within the Earls Court Regeneration Area could be developed within the context of the local and wider townscape. The assessment is made in the context of the Earls Court Regeneration Area Framework (June 2009) prepared by Urban Strategies Inc.
- 2.2 This study considers the existing built environment of the Earls Court Regeneration Area; listed buildings and conservation areas within the surrounding area; existing and consented large-scale development on and close to the Regeneration Area; and relevant national, regional and local planning policy. This study considers the potential suitability of the Regeneration Area to support tall buildings, and identifies further work that will be undertaken.

3.0 The Earls Court Regeneration Area in its Urban Context

- 3.1 The 27 ha Earls Court Regeneration Area straddles the boundary between the Royal Borough of Kensington & Chelsea (RBKC) and the London Borough of Hammersmith and Fulham (LBHF). It is bordered by West Cromwell Road (the A4) to the north, Philbeach Gardens, Warwick Road and Eardley Crescent to the east, the Old Brompton Road to the south and North End Road to the west. A railway line set into a cutting creates a man-made barrier running north-south which has restricted development along it. This condition is exacerbated within the Regeneration Area by railway sidings, which have created an urban wasteland and a backdrop to surrounding habitation.
- 3.2 The Earls Court Regeneration Area is set within an area that is primarily housing, interspersed with local shops and other commercial activities. Residential Victorian terraces and crescents with tree lined streets and squares are set around the Regeneration Area, and contrast with the Regeneration Area's much larger physical urban statement and more open grain. These streets contain buildings of architectural and urban quality. To the east, in RBKC, the Victorian terraces of Philbeach Gardens and Eardley Crescent overlook the vacant land beside the railway line. To the south, Lillie Road is lined with low rise commercial properties. To the west is the Clem Atlee housing estate, and terraces of shops and houses along North End Road. To the north, the A4 corridor, one of the principal arterial routes into central London, cuts through the residential streets and is flanked primarily by large scale offices and commercial buildings.
- 3.3 The Earls Court Regeneration Area benefits from good accessibility and is served by three LU Underground stations – Earls Court, West Brompton and West Kensington – and one overground station at West Brompton. The A4 runs east west along its northern edge. As a major transportation interchange it has led to a clustering of large and tall buildings.
- 3.4 Since the late 1930s the Regeneration Area has been dominated by the large mass of the barrel vaulted roof of the Earls Court Exhibition Centre and, since the 1960s, the tall Empress State Building. Earls Court Exhibition Centres 1 and 2 are located on the east side of the Regeneration Area in RBKC. They rise to the equivalent of 18 storeys in height. To the west, in LBHF, is the 31 storey Empress State Building, which is occupied by the Metropolitan Police Service. Beyond are two housing estates, West Kensington and Gibbs Green, which primarily comprise low-rise accommodation, though the larger scale blocks of the adjacent Clem Atlee Estate rise to 11 storeys. The roads within the housing estates connect the Regeneration Area to the adjacent residential townscape.

Existing and consented tall buildings in the surrounding area

- 3.5 The Empress State Building is located on the LBHF part of the Regeneration Area and is currently the tallest building in the locality, and is a prominent landmark. It was built in 1961 and was 100m tall with 28 floors until renovated and extended in 2003 by three floors: 17.3m were added to its height. Not only is it tall, but its triangular plan form with concave curtain walls creates a distinctive broad silhouette on the skyline.
- 3.6 Proposals for three developments along Warwick Road, to the north east of the Earls Court Regeneration Area, were approved by RBKC in 2008. The Territorial Army Centre at 245 Warwick Road will be replaced by a complex of four residential buildings, 9-11 storeys high. Four residential buildings of 7-17 storeys have also been consented on the Telephone Exchange site at 213-215 Warwick Road. At 181-183 Warwick Road, a hotel and residential development will reach 11 storeys in height.

Conservation areas and listed buildings in the surrounding area

- 3.7 Earls Court Regeneration Area is not situated in a conservation area and there are no listed buildings within the site. However, a number of conservation areas are clustered in the vicinity in RBKC and LBHF. They are shown in Figure 3.7 of the Framework document.
- 3.8 Adjacent to the east side of the Regeneration Area are the crescents of Philbeach Gardens and Eardley Crescent that comprise the Philbeach Gardens Conservation Area, and within it the Grade II* Listed St. Cuthbert's Church. These Victorian terraces are three storeys tall and are closely set and consequently largely obscure views beyond.
- 3.9 Hugh Roumieu Gogh's St Cuthbert's Church was built towards the end of the Victorian church-building boom in Kensington. Its "*rich interior*", as described in English Heritage's Listing citation, provides its primary architectural and historic interest. The setting of its Gothic pitched roof and fleche, and the white stucco adjacent terraces would be considered carefully in relation to any masterplanning exercise.
- 3.10 Development within the Regeneration Area would potentially be visible along the axes of Nevern Square and Earls Court Square: the Empress State building can already be seen from within these conservation areas. A regeneration scheme coming forward of high architectural quality and easily differentiated from the historic context would aim to avoid harm to the setting of historic buildings in the foreground.
- 3.11 Further east, other conservation areas are also characterised by low rise Victorian and Georgian terraces set in formal square and crescents. At the southeastern corner of Nevern Square Conservation Area, the Grade II Listed Earls Court Station fronts Earls Court Road. Its buff and green faience facade was built to the designs of Harry Ford in 1906 and was extended west to Warwick Road in 1937, here with a brown brick entrance. The ornate

central train shed was built in 1878 by John Wolfe Barry. The station is a low structure of two storeys surmounted by a short balustrade.

- 3.12 To the southeast of the Regeneration Area and the Old Brompton Road is the open space of Brompton Cemetery. It is one of seven Royal Parks as well as a RBKC conservation area. Any development within the Regeneration Area would be potentially seen beyond the western boundary of the cemetery. This side of the cemetery is more open and, as acknowledged by RBKC in their Conservation Area Statement, is of less architectural interest. It also lacks the mature trees that create the sense of enclosure and channelled vistas enjoyed in the eastern side of the cemetery. The undistinguished grey roof of the Earls Court Exhibition Centre can be seen at present from the Great Circle. A regeneration scheme would provide the opportunity to replace the exhibition centre with a landmark of improved quality that will potentially enhance the already distinctly urban setting of the cemetery.
- 3.13 To the west of the Regeneration Area in LBHF, a mixture of simple Victorian terraced housing and shops and 20th century residential blocks predominate. The closest conservation areas are Sedlescombe Road to the southwest; Turneville/Chesson and Queens Club Gardens to the west; and Baron's Court to the northwest bordering the A4 corridor. The residential streets in this area run largely parallel, from the southwest to the northeast, towards the Regeneration Area and the Empress State building. Modern housing estates to the west in LBHF are also visible in views along these residential streets. The open spaces of the Queens Club grounds and Hammersmith Cemetery are not on the Register of Parks and Gardens of Special Historic Interest but are located within Conservation Areas.
- 3.14 A cluster of conservation areas – the Gunter Estate, Fitzgeorge and Fitzjames, and Olympia – to the north of the A4 also contain low rise Victorian terraces. The topography of the area affords glimpses of buildings to the south: the Olympia building, which is itself listed, as well as the larger offices and commercial buildings that run along West Cromwell Road provide this area with a distinctly urban setting. Visually, they sever the residential streets of the conservation areas from those to the south of the A4, itself a significant east-west physical barrier.
- 3.15 The setting of conservation areas in the distant surrounding area would also need to be taken into consideration when developing a masterplan for the Regeneration Area. In particular, the open areas of Holland Park and Kensington Gardens to the northeast are both on the Register of Parks and Gardens of Special Historic Interest and are RBKC Conservation Areas. Buildings can be seen beyond the perimeters of both of these protected spaces at present. Tall buildings within the Regeneration Area would be expected to preserve or enhance that urban setting.

4.0 Planning Policy Context

National Planning Policy

Planning Policy Statement 1 (PPS1) – Delivering Sustainable Development (2005).

4.1 Paragraphs 13 and 34 are particularly pertinent to design. Paragraph 13(iv) states that:

“Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted (see paragraphs 33-39 below).”

And at paragraph 34 it is stated that:

“Planning authorities should plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.”

4.2 Objective criteria set out in *By Design* (and set out below) are endorsed in *PPS1* as they provide an objective framework by which to assess urban design proposals. Any development coming forward within the Regeneration Area would be assessed in relation to these criteria.

Planning Policy Guidance Note 15 (PPG15) – Planning and the Historic Environment (1994)

4.3 *PPG15* provides a full statement of government policies for the identification and protection of historic buildings, Conservation Areas and other elements of the historic environment. There is a general Government commitment to preserve the historic environment. It explains that the objective of planning processes should be to reconcile the need for economic growth with the need to protect the natural and historic environment (paragraph 1.2).

4.4 Paragraph 4.14 of *PPG15* provides that special attention shall be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a Conservation Area. This requirement extends to all powers under the Planning Acts, not only those that relate directly to historic buildings. The desirability of preserving or enhancing the area should also, in the Secretary of State's view, be a material consideration in the

planning authority's handling of development proposals that are outside the Conservation Area but would affect its setting, or views into or out of the area.

4.5 The setting of Listed Buildings and Conservation Areas is referred to at paragraph 2.16:

“Sections 16 and 66 of the Act require authorities considering applications for planning permission or listed building consent for works which affect a listed building to have special regard to certain matters, including the desirability of preserving the setting of the building. The setting is often an essential part of the building's character [...]”.

4.6 The presumption to *"preserve and enhance"* conservation areas and their settings is elaborated at paragraphs 4.19 and 4.20 of *PPG15*:

“4.19 The Courts have recently confirmed that planning decisions in respect of development proposed to be carried out in a conservation area must give a high priority to the objective of preserving or enhancing the character or appearance of the area. If any proposed development would conflict with that objective, there will be a strong presumption against the grant of planning permission, though in exceptional cases the presumption may be overridden in favour of development which is desirable on the ground of some other public interest.

4.20 As to the precise interpretation of 'preserve or enhance', the Courts have held (South Lakeland DC v Secretary of State for the Environment, [1992] 2 WLR 204) that there is no requirement in the legislation that conservation areas should be protected from all development which does not enhance or positively preserve. Whilst the character and appearance of conservation areas should always be given full weight in planning decisions, the objective of preservation can be achieved either by development which makes a positive contribution to an area's character or appearance, or by development which leaves character and appearance unharmed.”

By Design. Urban design in the planning system: towards better practice (DETR/CABE, 2000)

4.7 *By Design* is cited as an important reference document when assessing tall buildings, and is endorsed by *PPS1* as it provides an objective framework by which to assess urban design proposals and lists seven criteria against which urban design proposals should be judged. The criteria are listed below as seven separate headings.

i) **Character.** *A place with its own identity. To promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture.*

ii) **Continuity and Enclosure.** *A place where public and private spaces are clearly distinguished. To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas.*

iii) **Quality of the Public Realm.** *A place with attractive and successful outdoor areas. To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people.*

iv) **Ease of Movement.** *A place that is easy to get to and move through. To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport.*

v) **Legibility.** *A place that has a clear image and is easy to understand. To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around.*

vi) **Adaptability.** *A place that can change easily. To promote adaptability through development that can respond to changing social, technological and economic conditions.*

vii) **Diversity.** *A place with variety and choice. To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.*

Guidance on Tall Buildings (EH/CABE, July 2007)

4.8 The *EH/CABE Guidance on Tall Buildings* (July 2007) is intended to provide advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues that need to be taken into account. It sets out how CABE and English Heritage will evaluate proposals for tall buildings. CABE and English Heritage recommend that local authorities should use it as a basis for their own consideration of such projects. There are overlaps in approach that mesh this guidance with *By Design*.

4.9 It is stated at paragraph 3.3 of the Guidance that:

“All proposals for tall buildings should be accompanied by accurate and realistic representations of the appearance of the building. These representations should

show the proposals in all significant views affected, near, middle and distant, including the public realm and the streets around the base of the building. This will require methodical, verifiable 360 degree view analysis. Where a tall building is justified by its relationship to a cluster, the proposals should be illustrated in the context of proposed and approved projects where this is known, as well as the existing situation.”

Any submissions made through the planning application process would adopt this methodology.

- 4.10 Additional criteria for the evaluation of tall buildings are set out at paragraph 4.1 of the Guidance, and it is stated that applicants seeking planning permission for tall buildings should ensure that the following eleven criteria are fully addressed:

4.1.1 The relationship to context

4.1.2 The effect on the historic context

4.1.3 The effect on world heritage sites

4.1.4 The relationship to transport infrastructure

4.1.5 The architectural quality of the building

4.1.6 The sustainable design and construction of the proposal

4.1.7 The credibility of the design, both technically and financially

4.1.8 The contribution to public space and facilities

4.1.9 The effect on the local environment

4.1.10 The contribution made to the permeability of a site and the wider area

4.1.11 The provision of a well-designed environment.

Regional Planning Policy

The London Plan (GLA, 2008)

- 4.11 Policy 4B.1 is concerned with the principles of design for a compact city; 4B.2, promoting world-class architecture and design; 4B.3, enhancing the quality of the public realm; 4B.5, creating an inclusive environment; and 4B.8, respecting local context and communities. Policy 4B.9, is concerned with tall buildings and their location, and is linked to policies 3A.3 which states that development proposals should achieve the maximum potential of sites in terms of

development and policies 4B.1 and 4B.10. The latter policy relates to the impact of large-scale buildings. Policies 4B.11 and 4B.12 outline guidance for the protection for London's heritage.

- 4.12 The LP designates strategically important views (policy 4B.16) which are managed through the London View Management Framework (LVMF). Policy 4B.18 requires development proposals within the assessment areas of designated views to be assessed against the general principles of good design.
- 4.13 Policy 4B.9 of *The London Plan, Tall Buildings – location*, states that "*the Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings.*" (p. 252).
- 4.14 The London Plan recognises that "*tall buildings can be a very efficient way of using land and can make an important contribution to creating an exemplary, sustainable world city. They can support the strategy of creating the highest levels of activity at locations with the greatest transport capacity. Well-designed tall buildings can also be landmarks and can contribute to regeneration and improve London's skyline*" (para 4.121, p. 253).
- 4.15 To this end, Policy 4B.10, *Large-scale buildings - design and impact*, requires that tall buildings must "*be of the highest quality design*". Policy 4B.10 also requires that tall and large scale buildings relate positively to their local and wider context in terms of appearance, environmental sensitivity, amenity, security, accessibility and local transport capacity. Furthermore, Policy 4B.10 requires that all large-scale buildings, including tall buildings should "*be attractive city elements as viewed from all angles and where appropriate contribute to an interesting skyline, consolidating clusters within that skyline or providing key foci within views*" and should be "*suited to their wider context in terms of proportion and composition and in terms of their relationship to other buildings, streets, public and private open spaces, the waterways or other townscape elements*" (p. 253).
- 4.16 The Earls Court Regeneration Area does not fall within the viewing corridors of any of the protected vistas designated in the LVMF SPG (July 2007) and the revised draft replacement document issued recently (July 2009) for consultation.

Local Planning Policy

London Borough of Hammersmith and Fulham UDP (amended 2007)

- 4.17 The LBHF UDP was adopted in 2003 and amended in September 2007. It sets out the Borough's framework for development control and conservation. A number of policies relating to the protection and enhancement of the Borough's built environment will need to be considered when forming development proposals for the Earls Court Regeneration Area.
- 4.18 Policy EN2B relates to the *"Effect of development on the setting of conservation areas and views into and out of them."* Following PPG15, Policy EN2B stipulates that development within and outside of conservation areas will only be permitted if the character, appearance and setting of the conservation areas is preserved or enhanced. It states that: *"Views are a key element in the townscape and setting of conservation areas, and in the definition of their special character. Development should not negatively impact upon the quality of important views by obscuring them, introducing inappropriate elements to the foreground or affecting the townscape composition within. Important views in conservation areas are defined in the relevant Conservation Area Character Profile."*
- 4.19 UDP Policy EN31 protects *"Important views along, across, and from, the river"* as well as views of key landmarks within LBHF. Policy EN9 on High Buildings is struck through in the amended 2007 UDP and is no longer to be taken into account in the formation of proposals for the Regeneration Area.

London Borough of Hammersmith and Fulham Emerging Local Development Framework

- 4.20 The London Borough of Hammersmith and Fulham consulted on its Preferred Options on the Core Strategy and Site Allocations from June to August 2007. LBHF has recently published for consultation its Core Strategy Options, June 2009 which continues until mid July 2008. The borough currently expects adoption of the final Core Strategy in early 2011.
- 4.21 The Core Strategy Options sets out key priorities for delivering the spatial vision for Hammersmith and Fulham, these include:
- Promoting home ownership
 - Regenerating the most deprived parts of the borough
 - A top quality education for all – schools of choice
 - Setting the framework for a healthy borough

- Tackling crime and anti-social behaviour
- Creating a cleaner, greener borough
- Delivering high quality, value for money public services

4.22 The Core Strategy sets out a preferred option for the Regeneration Area. This preferred option seeks comprehensive development for a mix of uses, including residential, employment, hotel, leisure and office uses. The Regeneration Area is envisioned as a vibrant world class new urban quarter and as part of this the Core Strategy supports tall buildings. In describing the key objectives and principles for the Regeneration Area, the Core Strategy states that "Building design should be of the highest quality and, subject to that, there could be some scope for tall buildings. Design must take account of the local context, local conservation areas, and local views" (Section 8, page 85).

Royal Borough of Kensington and Chelsea UDP (amended 2007)

- 4.23 The RBKC UDP was adopted in 2002 and amended in September 2007. A number of policies relate to conservation and development that will need to be considered by proposals which might evolve within the Regeneration Area.
- 4.24 Policy CD27 requires that development within the Borough is of a high design quality and sensitive to the massing, height, material and character of existing development within the surrounding area. It does not preclude large scale or tall development but stipulates that the policy *"is intended to reinforce and enhance the traditional urban pattern of the Royal Borough"* by *"maintaining free movement, particularly of pedestrians"*, by improving the legibility of the townscape by *"preserving or creating features"* and by creating streets that are *"visually interesting and secure"* through the use, appearance and lay out of new development (paragraph 4.3.4). The same high standard of landscape design and quality of open spaces is also required of all new development (Policy CD38).
- 4.25 New development is also required *"to be physically and visually integrated into its surroundings"* (Policy CD28). Emphasis is placed on accessibility, through the preservation and improvement of routes within, and to and from, the Borough. New built forms should be designed so as to relate to the existing building lines and to maintain or enhance the enclosure of spaces, the legibility of access routes and main roads and the definition of key points of retail or civic value within the Borough. Policy CD28 also requires that development preserves or creates a built environment that *"contributes to local distinctiveness and character"* (CD28.d).

- 4.26 Policy CD37 on tall buildings has been struck through in the amended 2007 UDP, and a draft SPD has been issued by RBKC.
- 4.27 Policies CD57 outline RBKC's requirements for new development in relation to conservation areas and their settings. Following PPG15, the Policy stipulates that special attention must be made to the "*desirability of preserving or enhancing the character or appearance of each conservation area*".
- 4.28 Policy CD63 requires that new development take into account the potential impact on views within conservation areas, identified by RBKC within Conservation Area Character Statements, and considers "*the effect of development on sites adjacent to such areas*". Similarly, Policy CD69 states that RBKC will "*resist development which would adversely affect the setting of a listed building*". Special protection is given to the protection of the setting of Holland Park in Policy CD15 and to the protection and enhancement of RBKC's cemeteries, including Brompton Cemetery.

Royal Borough of Kensington and Chelsea Local Development Framework

- 4.29 The RBKC emerging core strategy outlines the principles behind the planning framework for RBKC and identifies specific development sites and their uses. The strategic objectives of the core strategy are to: keep life local, foster vitality, care for the public realm, renew the legacy, achieve diversity in housing, and secure our children's future.
- 4.30 In 2008 RBKC issued for consultation Towards Preferred Options as part of the core strategy. This document identified the Earls Court Regeneration Area as a broad location for development and regeneration and also a possible area for tall building development. The document referred to ongoing work to produce a tall building SPD. It cited an indicative policy direction pending the SPD permitting tall buildings where they do not cause harm to valued historic environments, contribute positively to urban legibility and public realm, have good public transport access and they are of outstanding architecture.
- 4.31 The Borough is now consulting on a series of places and strategic sites that are central to achieving the strategic objectives of the Core Strategy. It has identified 14 "places" requiring specific attention to place-making and integration of strategic objectives. The wider Earls Court area, of which the Earls Court Regeneration Area is part, is one such place. It is specifically considered to be one of seven areas of regeneration considered to have the greatest potential for significant new development to assist in meeting, for example, the borough's strategic housing targets.
- 4.32 The Earls Court 'place' is described as largely residential and predominantly Victorian building stock (5.1.1) but also home to one of the most important entertainment and exhibition centres

in the capital fulfilling both a local and a London wide role. The public transport connections are identified as a key attribute to the area but the one-way system is of significant detriment to the pedestrian experience in the local streets. Public open space is seen to be lacking with the exception of the Brompton Cemetery.

- 4.33 The 'vision' outlined for the area is one of reducing and improving traffic flow so that Earls Court town centre will become a greater draw and an "urban-village" environment can develop. The community infrastructure would continue to support a large residential community whilst the exhibition centre would be redeveloped retaining its important London wide function, drawing more visitors to this gateway location at the A4's arrival in Central London. The aim is also to improve pedestrian movement across the A4/ West Cromwell Road and reconnect the residential communities to the north and south of this busy thoroughfare.
- 4.34 In relation to heritage considerations for the Earls Court 'place', the Listed Earls Court Station and Church of St Cuthbert on Philbeach Gardens are specifically mentioned. Reference is made to a number of listed buildings and conservation areas in the area.
- 4.35 The portion of the Regeneration Area located within Kensington and Chelsea has also been designated a Strategic Site, meaning its development is considered by RBKC to be central to the achievement of strategic objectives for both the wider area and the Core Strategy itself.
- 4.36 A brief delivery strategy has been proposed for the Regeneration Area which identifies continued exhibition centre uses and / or convention centre use, with additional potential for office (10,000 sq m) and residential (300 units) uses. The borough would also support:
- significantly more residential and potentially additional office accommodation, subject to improved accessibility to the site;
 - an ICC on the site as part of a mixed use development;
 - waste management facilities of the size required to meet the GLA's requirement, if other alternatives are not available.

Royal Borough of Kensington and Chelsea Tall Buildings Draft SPD (October 2008)

- 4.37 The Tall Buildings draft SPD has been through consultation and is expected to be adopted shortly.
- 4.38 The SPD analyses the existing built fabric of RBKC. It aims to provide guidance on the suitability of sites for tall buildings and an appropriate scale for tall building proposals. It defines different categories of tall buildings, describes existing tall buildings in the Royal

Borough and identifies locations within the Borough where new tall buildings might be appropriately sited. It recognises that tall buildings can achieve high densities and maximise the potential of sites, particularly near major transport interchanges.

- 4.39 The draft SPD claims that tall buildings would not relate to the predominantly residential character and low-rise buildings of RBKC. Drawing on its analysis of the local architectural styles and existing tall buildings in the borough, the draft SPD cites existing 8-storey mansion blocks as an alternative model of high-density development (1.9) and rules out buildings of a height similar to the Grade II* Listed Trellick Tower, views of which it seeks to protect (Views LV10 and LV11, p.28).
- 4.40 The guidance proposes buffer zones around its conservation areas in order to protect the character and appearance of these areas and their settings. It states that tall buildings within the buffer zones are very likely to affect the setting of a conservation area and would normally be resisted. This approach is contrary to the spirit and detail of existing national and regional policy. PPG15 requires proposals to be assessed against relevant tests, most notably whether or not they cause harm. Tall buildings, appropriately sited and designed so as to relate to the surrounding townscape could potentially enhance the urban setting of a conservation area. This has been acknowledged by the Secretary of State in relation to recent planning decisions.
- 4.41 The draft SPD recognises that high density development may be appropriate around public transport nodes, identifying Earls Court, West Brompton and West Kensington stations as such locations and states that this may take the form of tall buildings.
- 4.42 It also recognises that stand alone or clusters of landmark buildings may be appropriate at gateways along the western border of the borough. The draft SPD refers to the physical barriers particularly railway corridors and the heavily trafficked entrance routes in to the borough that have lead to a poor urban environment. It suggests that "*Landmarks could enhance such border zones by emphasizing the gateways into central London*" (4.46). Figure 9 of the document identifies road and rail intersections along the western border – 'major gateways'.
- 4.43 Policy TB16 (p.41) states that "*Gateways along the western border could be marked by stand alone or clusters of 'district landmarks' which should be no taller than 3 – 4 x (45-60m or 148-197ft) the typical building height of their surroundings*". The guidance proposes a height limit at four times the perceived typical 15m height of a Victorian/ Georgian street in RBKC (see Figure 2), although this definition has no foundation in national or regional policy and, as shown in the response submitted by Capital & Counties on the draft SDP, is without a sound evidence base.

- 4.44 The draft SPD acknowledges that high density development with more mixed and intensive uses can have regeneration benefits, but at odds with the LP, questions if tall buildings act as a catalyst. The guidance advocates tall buildings should only be located where there is a strong argument for sustainability, accessibility and improvement of city image (policy TB18).
- 4.45 The draft SPD concludes by identifying areas that are:
- inappropriate for tall buildings – conservation areas, protected metropolitan view corridors, areas outside ,major transport node and corridors;
 - highly sensitive areas for tall buildings – buffer zones for conservation areas, backdrops of London panoramas, river prospects and landmark views; and
 - possible areas for tall buildings – gateways and non sensitive sites.
- 4.46 The document identifies two potential sites suitable for tall buildings: Westbourne Park Station and Latimer Road (at paragraph 4.48, and Fig. 10). The suitability of these sites is judged by RBKC on the basis of their border location, good transport links and lack of conservation areas in the close vicinity. The policy states that tall buildings will not be accepted outside these locations.
- 4.47 The EC Regeneration Area is a gateway site but it also falls within a buffer zone. Under the draft guidance the portion of the site within RBKC is considered highly sensitive for tall buildings. As a consequence, RBKC would expect new development on the site to be below 45m in height. This appears to contradict the key diagram in the Towards Preferred Options document which identifies the Regeneration Area as a possible location for tall building development.

5.0 The case for tall buildings within the Earls Court Regeneration Area

5.1 The EC Regeneration Area has been identified as a strategic development site by both boroughs in their respective Core Strategies and the indicative the Land Use Budget promotes a high density mixed use scheme. The Regeneration Area is well served by public transport. The draft SPD describes the area as a major transport interchange and accessibility to and through the site could be enhanced as a result of a well conceived masterplan. It is recognised in national, regional policy and the draft SPD that tall buildings can be a sustainable response to accommodate growth and achieve high density development.

5.2 The LP requires various factors to be taken into account when assessing tall building proposals. These criteria provide a useful basis on which to assess the suitability of a site for a tall building. They embrace location and other policy considerations. The Regeneration Area is assessed against these factors below and shown to meet the policy objectives. A number of the policy considerations relate to particulars of a scheme design and its potential impact and are not, therefore, specifically addressed in this study.

5.3 Tall buildings are promoted where they:

(a) create attractive landmarks

The draft SPD recognises that landmark development can enhance gateway locations particularly in border zones along the borough's western boundary. The Earls Court Regeneration Area is at a gateway location on a key arterial route into central London, at an important transport interchange and is appropriately positioned for landmark development. Development would be expected to achieve high standards of architectural quality and for new buildings and their settings. The particular circumstances of the Regeneration Area – its broad expanse, cross boundary location and varied local setting will encourage architectural variation in height, scale and style providing scope for an attractive landmark.

(b) help to provide a coherent cluster of related activities

The draft SPD refers to existing tall buildings in the borough of RBKC being clustered along main transit corridors, e.g. by railway cuttings or around central nodes. Development in the range of the indicative Land Use Budget could establish a new urban quarter creating a commercial mixed use hub and an appropriate setting for a grouping of tall buildings

(c) act as a catalyst for regeneration

The rationale for developing the Regeneration Area is underpinned by regeneration objectives. It is at present an underutilised site in an area experiencing significant pressure to find new employment and housing opportunities. It is identified by RBKC as an area of

regeneration having the greatest potential for significant new development, assisting the borough to meet its strategic housing targets. Tall buildings would mark the Regeneration Area as a destination in its own right and contribute to the regeneration and skyline of London as a whole. The EH/CABE guidance acknowledges at the outset that tall buildings “*can be excellent works of architecture in their own right; some of the best post-war examples are now listed buildings, individually, or in groups, they affect the image and identity of the city as a whole. In the right place they can serve as beacons of regeneration, and stimulate further investment*” (para 1.1).

(d) achieve maximum density compatible with local context, public transport capacity, sustainable residential quality

The indicative Land Use Budget provides the opportunity to achieve a high density scheme which responds to its local context. The regeneration scheme will take into account the excellent accessibility of the site and potential for future transport improvements and will deliver a significant amount of new housing with a range of housing tenures creating a sustainable new community.

(e) maximise potential of sites

Tall buildings within the Regeneration Area would enable its potential to be maximised.

(f) promote inclusive design and create or enhance the public realm

A regeneration scheme will provide the opportunity to create new areas of open space and improve connections to existing amenity areas, forming a new network of linked open spaces. Increasing permeability through the Regeneration Area and the public realm strategy will be an integral part of any masterplan. Tall buildings can realise efficient use of land freeing up open space opportunities and, in the appropriate place, a well designed tall building can improve the public realm.

(g) respect local context, history, built heritage, character and communities

The site is not within a conservation area but there are several nearby and it lies within the buffer zone proposed in the draft RBKC SPD. The borough regards areas near conservation areas, historic buildings and spaces as highly sensitive to the location of tall buildings, hence designation of the proposed buffer zones. PPG15, however, sets out the test in relation to the notion of harm. This test has been debated at public inquiry and it has been accepted in recent Secretary of State decisions that the introduction of tall buildings does not necessarily harm the settings of conservation areas or even listed buildings of national importance such as St Paul’s Cathedral or World Heritage Sites such as the Tower of London and the Palace of Westminster. Such points were accepted when planning permission was granted at Lots Road Power Station for 25 and 36 storey buildings on a site also straddling RBKC and LBHF.

The evolving policy should take into account guidance in PPS1 and By Design. The latter states “*relating new development to the general pattern of building heights should not preclude a degree of variety to reflect particular circumstance*” (para 4.2).

The potential impact of tall buildings located within the Regeneration Area on historic buildings and sensitive views will be assessed through any masterplanning process. Tall buildings have the potential for enhancing the skyline and reinforcing the urban context of Conservation Areas within the local and wider area. As part of the masterplanning and planning application process, visual representations of any proposed tall building will be undertaken to aid an assessment of the impact on its surrounding context. This will follow the EH/ CABI joint guidance.

The impact of any regeneration scheme in local and mid distance views identified by both boroughs in their emerging policy guidance will be assessed in developing the masterplan and working up a scheme proposal. This will include, if relevant, views from the river and the impacts on specific landmark features.

(h) provide for or enhance a mix of uses

The indicative Land Use Budget proposes a range of uses which will enhance those on the site at present to help create a vibrant mixed use new community.

(i) meet the requirements of the London View Management Framework

The Earls Court Regeneration Area does not fall within the protected viewing corridors. Tall buildings on the site could nonetheless be visible on the skyline and potentially appear to the side of the viewing corridors and in the background of other designated views in the LVMF. The potential visibility of buildings sited within the Regeneration Area, and their potential contribution to the attractiveness of the local townscape and skyline would be tested.

- 5.4 Development proposals coming forward in the Regeneration Area will do so as part of a masterplan and in accordance with design principles established through supplementary policy guidance and other development control considerations.

6.0 Townscape Strategy

- 6.1 A significant amount of residential and commercial development is appropriate across the Earls Court Regeneration Area given its size and accessibility. There is the opportunity to transform the Regeneration Area into a sustainable urban quarter of up to 1,640,000 sq m of development, comprising mostly residential (up to 900,000 sq m) and office accommodation (up to 550,000 sq m), with supporting retail (up to 55,000 sq m), hotel (up to 65,000 sq m), culture, destination and leisure (up to 50,000 sq m), and educational and other social and community facilities (up to 20,000 sq m). This is an indicative Land Use Budget as the potential of the Regeneration Area will evolve further as a masterplan is progressed, including extensive consultation. Developing the tall building strategy as part of this process will help to refine the quantum and mix of potential uses on the site.

Residential Development

- 6.2 The strong character of the crescents to the east suggests the potential for a connected street-related pattern within the Regeneration Area. The mansion blocks to the north-west of the area also present an attractive scale and form for the western edge. The need for larger, more family-oriented units would respond to this overall pattern of scale and form. The centre of the Regeneration Area, given its high accessibility and distance from adjacent neighbourhoods, is suitable for higher density and taller housing forms.

Office Development

- 6.3 Two general areas would appear most appropriate for office development. The visibility of the A4 / West Cromwell Road frontage provides good access and road connectivity. The centre of the Regeneration Area is placed conveniently between the LU Underground and NR overground stations, and a connecting spine of office locations could be arrayed along a north-south axis. This location is ideal for the variety of uses complementary to a business quarter, such as hotels and the range of small businesses and services that will support such activities.

Retail Development

- 6.4 To be sustainable, there should be sufficient retail activity to make the development an interesting and attractive new urban district able to service the population that would live and work there, while ensuring that such provision is complementary to and not competitive with, the existing retail centres and streets in the wider area. Private and public elements of the development would be further defined by shop frontages, and routes through the site and connections with the surrounding area strengthened.
- 6.5 The potentially higher intensity and strengthened accessibility of the centre of the Regeneration Area suggests a need to focus retail, restaurant and cultural activity with

sufficient critical mass to animate a central place (or places). Additionally, as the Regeneration Area is large and will be accommodating a substantial living and working population, and some areas particularly to the north and east will have no ready convenience shopping, some local retail clusters at appropriate places would also be desirable.

Cultural, Destination Leisure Uses

- 6.6 A comprehensive regeneration scheme to be promoted will include these facilities on parts of the Regeneration Area site in good proximity to Underground stations, where suitable accommodation can be provided and potential synergy created with other uses on the site. These facilities are likely to be related to the public realm strategy and opportunities for a range of character spaces appropriate to the scale and mix of surrounding uses.

Community Clusters

- 6.7 A development of this scale will bring a significant number of new residents to the area, creating the need for a range of new community facilities, which may include schools, doctors' surgeries, crèches and other services. The Regeneration Area could provide a cluster of service activity, open space and any required community facilities to create a sense of local identity, particularly in areas at some distance from local streets. The needs and locations for new community infrastructure will be determined at the masterplan and subsequent stages.

Open Spaces and Public Realm

- 6.8 The location and pattern of open spaces will be determined through a masterplan for the Regeneration Area to establish a hierarchy of open spaces comprising different types of open space that will benefit from the overall quality of the new district and its surroundings, while also responding to adjacent land uses and activities.
- 6.9 Open spaces will be established with good accessibility to Earls Court and West Brompton stations and the potential for a green link to West Brompton Cemetery would reinforce connection to what is already a cherished community asset, and which may in future become a more active open space under borough plans to add the cemetery to its collection of recreation spaces.

Possible Spatial Concepts for the Regeneration Area

- 6.10 Several potential spatial concepts for the Regeneration Area are being explored through the following broad options:
- (a) **The Grand Avenue:** an urban parkway would be extended north – south through the Regeneration Area, providing a strong structuring element and establishing a clear identity for the area.

(b) **The Organic Plan:** sinuous traffic routes would provide a more varied pattern of streets and blocks and would resolve many of the inherent spatial and formal complexities that exist adjacent to the area to create a seamless whole.

(c) **The Grid:** a regular grid of north-south and east-west streets would create an even distribution of districts, each potentially with their own identity, and a standardised block pattern.

(d) **The Crescents:** with this option the traditional crescent street pattern of West London would be extended west to provide a structure that generally reflects that of the wider area.

Conclusions

6.11 Spatial proposals will be assessed in relation to relevant design policy and guidance and the criteria set out in *By Design*, to realise urban design principles that would achieve a high standard of architectural quality.

7.0 Massing Strategy for Tall Buildings

- 7.1 The quantum of accommodation and potential spatial organisational options outlined in the previous section will result in a range of three-dimensional height envelopes for the Regeneration Area, which will be tested as a masterplan is evolved.
- 7.2 The Earls Court Regeneration Area is large enough, and its centre at a sufficient distance from adjacent neighbourhoods, to be an appropriate location for taller buildings. Locating tall buildings in the area would maximise the opportunity presented by its size, strategic location, high level of connectivity, and proposed quantum of development programme being proposed. Tall buildings that are thoughtfully sited and designed can create a sense of place that is interesting and varied. They would also be key to the development of a unique and identifiable image for the proposed urban quarter which would be achieved through quality design and character of world class standards.
- 7.3 A major development must however be planned with a high degree of sensitivity in the deployment of taller buildings if views of the area are not to be intrusive and the skyline of the development is to be an attractive addition to the profile of London. The area is relatively unaffected by protected views defined by the LVMF and the previous RPG3, and views and vistas from the locally sensitive locations. Potential impacts on local and district views from conservation areas, such as that from Brompton Cemetery, would be taken into account when fixing the scale, massing and location of tall buildings within the Regeneration Area. They would also be considered when forming detailed designs, so as to ensure that the architectural character of the development responds to the character of its locality.
- 7.4 Clustering of taller buildings into attractive composed groupings is consistent with current planning directions and provides an alternative to isolated, more intrusive, high buildings on individual smaller sites scattered through the boroughs. The LP supports the development of tall buildings where they create attractive landmarks enhancing London's character, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration (Policy 4B.8). Tall buildings within the Regeneration Area would provide a sense of place and give the area its own sense of identity, and make the most of its role as a transport node for both boroughs.
- 7.5 The general pattern of heights in and around the Regeneration Area at present is of low to medium scale, with some significant exceptions. The existing Earls Court building complex is of very substantial bulk and reaches up to an effective 18 storeys and is highly visible from the surrounding area. The Empress State Building is 31 storeys and the TfL building to the north is 9 storeys. Isolated higher buildings are found along Lillie Road and Cromwell Road.
- 7.6 This height context and the proper respect for views of any regeneration scheme from the surrounding neighbourhoods and wider city suggest locating taller buildings along a 'ridge' of

height running north – south through the centre of the Regeneration Area. From this central ridge, development would scale down to make compatible transitions in scale to the surrounding areas, which are predominantly low-medium rise residential to the east and west with larger scale office and commercial buildings on the main roads to the north and south of the Regeneration Area. While attention to these local relationships is important, attention must also be paid to the collective composition of individual taller buildings, to its urban profile, when seen from a distance – something that should be deliberately sculpted to achieve an appropriate feature in the evolving landscape of London. Such clusters would be preferable to scattered towers.

- 7.7 In accordance with national and regional policy and guidance, design proposals for tall buildings should be judged in the round and on their specific merits: policy supports the notion that tall buildings may have an acceptable impact on even sensitive views if they are well designed. Indeed, in some instances tall buildings have been found to enhance sensitive views.
- 7.8 A detailed views assessment would be undertaken as part of this process to establish the potential visibility of development of varying heights in different locations on the site and the sensitivity of the viewpoint in townscape terms. The exercise would consider potential impacts in long, middle and local distance views including those designated in policy and from other locations agreed with the boroughs. The analysis would be based on survey material using the verified views methodology. It would be undertaken in consultation with RBKC, LBHF and other relevant stakeholders.

8.0 Conclusions

- 8.1 A masterplan would set the framework so that the architectural and urban design character – the townscape – of any proposals for the Earls Court Regeneration Area would achieve a high standard of architectural quality that meets the objective criteria for good urban design set out in *By Design*, which is endorsed by PPS1.
- 8.2 A significant amount of residential and commercial development is appropriate across the Earls Court Regeneration Area given its size and accessibility. To be sustainable, there should be sufficient retail activity to make the development an interesting and attractive new urban district able to service the population that would live and work there.
- 8.3 By responding to and connecting directly with the existing configuration of streets and building heights around the perimeter of the Regeneration Area a considerable diversity of built form is feasible and appropriate. The location and pattern of open spaces determined through a masterplan will establish a hierarchy of different types of open space that will benefit from the overall quality of the new district and its surroundings, while also responding to adjacent land uses and activities.
- 8.4 According to the existing strategic planning policy framework, the Earls Court Regeneration Area is an appropriate location in principle for tall buildings. The site has also been identified by both boroughs in draft Core Strategy documents as an appropriate location for tall buildings. The masterplan for the Regeneration Area could site tall buildings in appropriate locations within the Regeneration Area so as to enhance the local and wider townscape, in accordance with policy criteria.
- 8.5 In accordance with national and regional policy and guidance, design proposals for tall buildings should be judged in the round and on their specific merits: policy supports the notion that tall buildings may have an acceptable impact on even sensitive views if they are well designed. Indeed, in some instances tall buildings have been held to enhance sensitive views.
- 8.6 Where visible, individual well designed tall buildings could be designed to respond positively to the setting of existing buildings in these views, presenting high quality landmarks in relation to Earls Court and West Brompton LU stations. A cluster of tall buildings at this western gateway to London would have the potential to create a strong identity for this part of west London.
- 8.7 Tall buildings within the central zone of the Earls Court Regeneration Area that step down in height around the perimeter towards the lower heights of more traditional building forms locally, embracing new areas of public realm, would have the potential to create a major focus for a significant new urban quarter and sustainable community.



Earls Court Regeneration Area Core Strategy Evidence Base Summary Transport Study

Capital & Counties on behalf of Earls Court and
Olympia Group

June 2009





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1 Executive Summary

1.1.1 This technical report provides evidence in support of the Earls Court Regeneration Area in relation to transport matters.

1.1.2 The Earls Court Regeneration Area covers 27 hectares and comprising:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

1.1.3 The indicative land use budgets assessed in this report are based on 1,380,000 to 1,640,000 sq m of development comprising a comprehensive mix of complimentary land uses to provide a sustainable community for the area.

1.1.4 The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study would therefore be subject to further review as any development proposals progress.

1.1.5 Most of the Regeneration Area benefits from a high level of public transport accessibility and there is scope to improve this further. Regeneration of this area is in line with planning policies that seek to locate major new developments in proximity to transport infrastructure. The transport implications of the indicative land use budget have been assessed and are reflected in the transport strategy considered in this study.

1.1.6 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

1.1.7 The transport strategy will include a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and reduce car dependency, in line with national, regional and local policy aims. The proposals support the Borough’s aspirations for the area and will provide strategic benefits to the transport network by helping to tackle a number of existing issues which have been identified in the draft Core Strategy.

1.1.8 The transport strategy aims to mitigate existing transport problems, increase accessibility across the Regeneration Area and to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings. Subject to the outcome of the core strategy consultation, it is the intention to develop the transport strategy in close liaison with RBKC, LBHF, TfL and other stakeholders as the Core Strategy and the masterplanning process move forward.

1.1.9 Based on the indicative land use budget, the development proposals are anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. The increased demand resulting could be accommodated through infrastructure improvements across the local transport network.

1.1.10 The indicative land use budget would generate less traffic than existing large Earls Court Exhibition Centre events

2 Introduction

2.1 SCOPE OF STUDY

2.1.1 WSP and Halcrow have been appointed to advise Capital and Counties on behalf of the Earls Court and Olympia Group on the transport aspects of a potential redevelopment of the Earls Court Regeneration Area. This study forms part of the evidence base for the Regeneration Areas. The Regeneration Area comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.2 The summary study considers the transport implications of a potential development scenario on the transport infrastructure in the vicinity of the Earls Court Regeneration Area, which covers 27 hectares and comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.3 For the purpose of the technical analyses in this study, an indicative land use budget of 1,380,000 to 1,640,000 sq m has been assumed for the Regeneration Area. The breakdown of this overall total is provided in Table 1.1. The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study will therefore be subject to further review as masterplanning and any development proposals progress

Table 1.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

2.2 REPORT STRUCTURE

2.2.1 This study provides an initial technical briefing, which will in due course inform any future masterplanning process. It sets out the potential transport issues, constraints and opportunities for the Regeneration Area drawing on work undertaken to date and the findings of preliminary studies of the existing situation. It also provides suggestions for the development of a sustainable transport strategy to build on the significant potential of the area to deliver a highly sustainable development. The remainder of the study is set out as follows:



-
- Section 1 is an Executive Summary
 - Section 2 is an Introduction to the context of the summary study
 - Section 3 provides an overview of relevant transport policy in relation to the site;
 - Section 4 reviews the existing transport infrastructure in the vicinity of the site;
 - Section 5 considers the potential transport impacts based on the indicative land use budgets;
 - Section 6 discusses the potential Regeneration Area transport strategy; and
 - Section 7 concludes and summarises the findings of this study.



3 Policy Overview

3.1 NATIONAL

3.1.1 The Government's over-arching strategy is set out in Planning Policy Guidance Note 13 (PPG13), which emphasises the key themes of sustainable development. The document reinforces the message that there must be greater integration of planning and transport in order to promote more sustainable transport choices and reduce the need to travel, especially by private car.

3.1.2 The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices and to promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling. It therefore advocates:

- actively managing the pattern of urban growth to make the fullest use of public transport;
- increased intensity of development at locations which are highly accessible by public transport, walking and cycling;
- reducing the amount of parking in new developments, as part of a package of planning and transport measures to promote sustainable travel choices;
- promoting mixed use development, which can provide very significant benefits in terms of vitality and diversity and in promoting walking as a primary mode of travel;
- producing a broad balance at the strategic level between employment and housing, to minimise the need for long distance commuting;
- focussing mixed use development involving large amounts of employment, shopping, leisure and services in city, town and district centres, and near to major public transport interchanges (see paragraph 20); and
- encouraging a mix of land uses, including housing, in town, suburban and local centres.

3.2 REGIONAL

THE LONDON PLAN (CONSOLIDATED WITH ALTERATIONS SINCE 2004)

3.2.1 The Plan sets out policies to help London manage significant growth in London's population and jobs. In terms of transport and development, the key themes are:

- encouraging proposals for large residential developments in areas of high public transport accessibility, including the provision of suitable non-residential uses within such schemes;
- encouraging patterns and forms of development that reduce the need to travel especially by car;
- seeking to improve public transport capacity and accessibility where it is needed;
- supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity; and



- ensuring that on-site car parking at new developments is the minimum necessary, with no over-provision that could undermine the use of more sustainable non-car modes.

A NEW PLAN FOR LONDON (APRIL 2009)

3.2.2 In July 2008 a consultation document 'Planning for a Better London' was published outlining the approach that was proposed to the revision of the London Plan. The next stage of this review is the publication of 'A New Plan for London'. It is intended that the new London Plan would be completed in around four years, with various supplementary planning documents being issued in the meantime.

3.2.3 Pages 61 to 65 of A New Plan for London discuss policy considerations related to London's Transport networks. It states the following objective;

- *A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan.*

3.2.4 Reference is also made to a co-ordinated approach to land use and transport planning stating:

- *Close co-ordination of the provision of transport infrastructure and services with land use development is essential to support London's continued development and growth. Good public transport access will not in itself guarantee development but it is a necessary condition for a successful city – one in which everyone has easy, safe and convenient access to jobs, opportunities and facilities.*

3.2.5 There is also an emphasis on delivering reduced congestion within London's streets and providing environments suitable for all users It states:

- *London's streets perform a variety of functions – they should provide a safe and pleasant means of travelling on foot, by cycle, bus or car; and act as a network of attractive public spaces in which people can interact. The new Plan will emphasise facilitating essential access for people, goods and services, and give strong support for cycling, walking and taking the bus – in town centres, other parts of Outer London and across central London.*

3.2.6 Page 64 states that in reviewing the London Plan the Mayor proposes to:

- *Develop a new, criteria based, approach to road schemes which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve;*
- *Tackle congestion and traffic reduction, including investigating road user charging in the future;*
- *Allocate street space in line with MTS priorities, including shared space, where appropriate, (taking account of the safety of all pedestrians, particularly visually impaired people); improve conditions for buses; and investigate coach hubs;*
- *Substantially strengthen policy on walking and support the "Legible London" initiative;*
- *Put in place strong policies supporting cycling, with reference to the Velib cycle rental scheme and cycling superhighways;*
- *Develop new cycle parking standards; and*
- *Strengthen policy on public realm enhancements.*



THE MAYOR'S TRANSPORT STRATEGY 2001

3.2.7 This document supports the Mayor's vision of London as an exemplary sustainable world city. The Transport Strategy aims to increase the capacity, reliability, efficiency, quality and integration of London's transport system to provide the world class transport system the capital needs. The ten key transport priorities which flow from this are:

- reducing traffic congestion;
- overcoming the backlog of investment in the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services;
- making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing the frequency of services;
- better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London wide, high frequency 'turn up and go' Metro service;
- increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving access to international transport facilities; improved orbital rail links in inner London; and new Thames river crossings in east London;
- improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice;
- supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better maintenance of roads and bridges, and improved co-ordination of streetworks;
- making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts;
- improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion; and
- bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environment.

MAYOR'S TRANSPORT STRATEGY – STATEMENT OF INTENT (MAY 2009)

3.2.8 A new transport strategy is currently under consultation with the London Assembly and GLA Group, prior to a full draft which will be subject to public consultation in Autumn 2009. Publication of the final new strategy is scheduled for early 2010.



3.2.9 The draft principles are largely in line with the current Transport Strategy, but with more emphasis on the transport needs and viability of Greater London as a whole rather than focusing on Central London. Key themes include: ensuring a lasting transport legacy at the Olympic and Paralympics Games venues including Earls Court; improving transport opportunities with significant investment in public transport, walking, cycling; and tackling climate change through measures, such as, ensuring at least 20 percent of parking spaces in new developments have charging points for electric vehicles.

3.2.10 The existing proposals largely relate to the projects and proposals already committed to in TfL's nine-year Business Plan. In addition, they also include those improvements to the National Rail network to be delivered by Network Rail and the Government up to 2014, as part of the current High Level Output Specification Control Period 4 funding package, and by other major agencies (e.g. BAA and the Highways Agency) delivering transport improvements impacting on London.

3.2.11 The document also confirms the Mayor's intention to remove the Western Extension Zone (WEZ) of the Congestion Charging zone, following a non-statutory consultation with the public and stakeholders. In the future, wider road user charging may be explored in the context of a national scheme and charging in town centres may also be considered. Other measures, such as, upgrading signal control junctions, improving the management of roadworks and road enhancements will be used to mitigate the effects of the removal of the WEZ.

LONDON FREIGHT PLAN (OCTOBER 2007)

3.2.12 The London Freight Plan sets out the steps that should be taken over the next five to ten years to identify and begin to address the challenge of delivering freight sustainably in London.

3.2.13 The Plan has no statutory force, but has been developed to implement the Mayor's Transport Strategy, and is a material consideration for planning. The same principles underpin the Mayor's Transport Strategy.

3.2.14 The specific policy aims are to:

- Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing in order to support London's economy;
- Minimise the adverse environmental impact of freight transport and servicing in London;
- Minimise the impact of congestion on the carriage of goods and provision of servicing and;
- Foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practicable.

3.3 LOCAL

RBKC ADOPTED POLICY

3.3.1 The 2002 Unitary Development Plan (UDP) recognises that many of the transport-related issues affecting RBKC need to be viewed and resolved in a London-wide context, as well as reflecting residents' interests. It also acknowledges that solutions to many transport challenges require a coordinated, strategic approach by government and its agencies, transport authorities and transport providers and operators.



3.3.2 It proposes an effective transport system that is integrated with land-use planning and is based on patterns of land-use which reduce the need to travel and promote the use of public transport, walking and cycling as alternatives to the private car.

3.3.3 RBKC has formulated eight principal strategic policies within the former UDP. In the revised UDP, the number of principal strategic policies has reduced to three and those relating to transport issues are:

- STRAT 5: To ensure that further visitor related development locates in places that are well served by public transport and does not harm the residential character or amenity of the Borough.
- STRAT 7: To promote sustainable development through locating high trip generating uses in areas which are or will be well served by public transport and by encouraging the local provision of services and facilities to reduce the need to travel.

3.3.4 RBKC has adopted the following objectives for transport in the Borough:

- locate high trip-generating activity in areas well served by public transport;
- improve access to all land uses, especially for those with special mobility needs through the efficient use of the transport network;
- reduce the need to travel and, in particular, the number and length of motor vehicle trips by ensuring that development is located appropriately;
- promote measures to reduce the need to travel;
- reduce overall levels of road traffic in the Borough;
- reduce air pollution from road traffic and the noise nuisance caused by transport;
- increase the proportion of journeys made on foot and by bicycle;
- improve public transport so it is more convenient and reliable to use, is better able to meet demand and is attractive as an alternative to the private car;
- reduce the number and severity of road accident casualties;
- minimise the adverse effects of traffic in the Borough, particularly on the environment of residential areas and shopping centres;
- ensure that development does not add to on-street parking stress, in particular where demand is already saturated; and
- ensure that changes to the transport infrastructure improve the Borough's townscape.


3.3.5 These objectives are reflected in strategic transport policies STRAT 25, STRAT 26, STRAT 29 and STRAT 35.

3.3.6 Policy TR28 states that RBKC will:

“resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough's Road Network.

Consideration may be given to limited additional highway provision where there will be no overall opportunity to increase the volume of traffic passing through the Borough. Actual proposals are likely to be limited but where proposals are advanced, complementary traffic management schemes will be designed to limit the possibility of adding to traffic volumes.

The Council, however, has supported, for a long time, road proposals that could provide some relief to the Earls Court one-way system. This support should also extend to



signage changes to re-route long distance traffic from these roads, which are linked with the Council's desire to see the Earl's Court One-Way System and the Embankment removed from London's Strategic Road Network. The Council supports means of improving the access to Earls Court Exhibition Centre, in order to reduce the number of commercial vehicles and coaches from the residential areas around Earls Court. The Council has supported an access road for lorries running north of the Centre, alongside the West London Line and beneath the West Cromwell Road, linking with Warwick Road."

RBKC DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.7 Section 5 of the "Places" draft Core Strategy document highlights a number of existing transport issues in the Earl's Court area:

- *"...the quality of the town centre [on Earl's Court Road] is shattered by the one-way south bound traffic, which forms part of the Earl's Court One-Way System (para 5.1.2);*
- *The One-Way System travels north up Warwick Road, and degrades the residential environment of that street (para 5.1.2);*
- *Cromwell Road also acts as a significant barrier to pedestrians (para 5.1.2);*
- *...using buses can be confusing because of the One-Way System (para 5.1.4);*
- *The One-Way System also makes for a poor pedestrian environment (para 5.1.4);*
- *There is at present no easy way to get from the Exhibition Centre to the Town Centre (para 5.1.6); and*
- *Air quality is a concern in the area due to pollution from traffic(para 5.8.1)"*

3.3.8 The document also sets out the aspirations and vision that RBKC has for the future development of the Earl's Court area. The key aspirations relating to transport are:

- *" unravelling the One-Way System (para 5.1.8);*
- *...reducing the traffic flow (para 5.1.8);*
- *...offering an attractive "urban-village" environment (para 5.1.8);*
- *...new good direct connection to the Exhibition Centre (para 5.1.8);*
- *Streetscape and pedestrian improvements to Cromwell Road...making it more pleasant for pedestrians and residents and marking the arrival of the A4 in Central London (para 5.1.8);*
- *Pedestrian movement across West Cromwell Road will be improved, particularly at the junction with Warwick Road (para 5.2.1);*
- *A new north-south link to the west of the railway line (para 5.2.1);*
- *...an improved public transport interchange between West Brompton station and Earl's Court station (para 5.2.2);*
- *... reduction and rationalisation of street clutter (para 5.7.1); and*
- *...support the reinstatement of two-way working and significant enhancements to the streetscape (para 5.7.2).*

LBHF ADOPTED POLICY

- UDP Policy G4 sets out the LBHF transport objectives as:



- development will be guided to locations that minimise the need to travel, and will be required to incorporate access arrangements that encourage the use of sustainable modes of travel and transport;
- the intensity of development will be related to accessibility by public transport, with new development expected to promote traffic restraint and reduction, so as to reduce congestion and air pollution and to avoid the need for increased road capacity;
- land use provision for improvements to the road network will only be made where necessary in the interests of traffic safety or maintaining the free flow of essential traffic;
- the siting, design and layout of development will be required to provide:
 - easy access by disabled people
 - safe, secure and direct access by pedestrians
 - facilities to encourage travel to and from the development by cycling and other sustainable modes of travel and transport.
- measures will also be sought, in connection with development proposals, to:
 - secure necessary improvements to, and development of, public transport systems and services, including additional stations on the West London Line;
 - ensure that road safety is not compromised and that the free flow of essential traffic is maintained;
 - minimise vehicle parking demand both by controlling the amount of on-street parking provision and by securing the introduction of complementary parking controls and traffic management measures to control off-site parking;
 - to promote the use of rail and water for freight transport;
 - protect residential areas and main shopping streets from the environmental impact of traffic generated by development proposals.

3.3.9 Policy TN8 defines a hierarchy of roads in LBHF and explains that developments will not be permitted if they hamper the ability of these roads to provide safe and effective access.

3.3.10 Policy TN13 notes that all developments will be assessed for their contribution to traffic generation and their impact on congestion.

3.3.11 Policy TN28 on freight movements, seeks to:

'Encourage and support the confinement of heavy lorries to suitable routes and their exclusion from unsuitable roads, other than for final access to premises.'

3.3.12 The justification to this policy recognises the importance of freight for the local economy, and the potential conflict with the quality of the local environment. The management of freight routes is seen as one way that this can be achieved.

LBHF DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.13 The Core Strategy Options document for the London Borough of Hammersmith and Fulham (LBHF) was put out to consultation on the 5th June 2009. This document makes reference to the following in the context of the Earl's Court area.

3.3.14 In Section 4, Issues Opportunities and Constraints:



- *...Earls Court...are major opportunity areas because they not only have substantial development potential but because they have very high existing public transport accessibility (para 4.104);*

3.3.15 In section 5, Spatial Vision:

- *... We will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment. Where we do not control the roads, for example the busy A4 and A40, we will have worked with our partners, particularly Transport for London to achieve these aims. We will also have worked with partners to improve transport in the borough, particularly north south links, as well as the opportunities for cycling and walking. Where there is major development we will have improved access, particularly for pedestrians and cyclists (para 5.17);*

3.3.16 In section 7, Key Spatial Options for Delivering the Council's Vision it is stated that:

- *The Council has a key objective to create decent neighbourhoods, regenerate town centres and the most deprived parts of the borough, particularly White City, West Kensington/Earls Court/North Fulham and Hammersmith and to reduce polarisation and worklessness to create more stable, mixed and balanced communities where people can live, work and prosper (para 7.3)*
- *We think the West London Line is capable of running services to a much higher level to help unlock regeneration potential(para 7.8)*

3.3.17 Within Section 8, consideration is given to the appropriate development type in the Earls Court Regeneration Area. Within this section it is stated that:

- *The area is highly accessible to public transport, being close to West Brompton Station which is on the District and West London Lines and to Earls Court Station, on the District and Piccadilly Lines. Although there is little spare capacity on these lines at peak times, some improvements will take place with the future plans of Transport for London. The highway network in the area is congested through the town centre (past the street market) and south of the A4. (para 8.95)*
- *Employment creation to more than replace the potential loss of the exhibition centre (para 8.111)*



4 Baseline Conditions

4.1 WALKING AND CYCLING

4.1.1 Transport policies at all levels encourage walking and cycling as being the most sustainable and low-impact modes of travel. PPG13 highlights the potential for walking to replace short car trips, especially for journeys under 2km. It also notes that cycling has the potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

WALKING

4.1.2 According to the Mayor of London's website, almost seven million walking journeys on foot are made in London every day and walking accounts for 80 percent of all trips under one mile. Walking is a cost effective, accessible, healthy and enjoyable form of travel, and is a compulsory element of any journey.

4.1.3 The Walking Plan for London – '*Making London a walkable city*' was published by the Mayor in February 2004 to promote walking. The Plan adopts the 'the 5 'Cs' from the London Planning Advisory Committee (LPAC) Walking Strategy for London as key indicators of walkability which are; Connected, Convivial, Conspicuous, Comfortable and Convenient.

4.1.4 The principal shortcomings in the Regeneration Area are the poor pedestrian environment along the A4 and the relative impermeability of the pedestrian network across the West London Line and through the privately-owned Earls Court and Olympia sites.

4.1.5 As there is no direct through route from the LBHF Site to the town centre, residents currently need to use the A4 West Cromwell Road to access Earls Court Road. For example, from Gibbs Green Close (part of the LBHF site) to the junction of Earls Court Road/Nevers Place; the crow fly distance is approximately 815m equivalent to a 10 minute walk whilst the distance walking along the accessible streets would be approximately 1.3 kilometres equivalent to a 16 minute walk

4.1.6 Warwick Road is a predominately residential street with the exception of the Exhibition Centre with good, well maintained and lit footways. Informal crossing points including tactile paving to facilitate north-south movement. There are signalised pedestrian crossings at its junction with the A4 West Cromwell Road and Old Brompton Road and between the tube station and Exhibition Centre. There is, however, a lack of crossing points at intermediate locations along the street which would facilitate crossing movements between the footways along either side.

4.1.7 The A4 is a significant barrier to pedestrian movement; a complicated multi-stage pedestrian crossing is provided at the A4 West Cromwell Road/Warwick Road junction to negotiate the multiple lanes of traffic on a very wide carriageway.

4.2 CYCLING

4.2.1 The London Cycle Network (LCN) is a network of signed routes for cyclists across the capital. Over 550km of the 900km network has been completed to date; final completion is due by the end of 2010. TfL are also investing in an off-road network of routes through London's parks, and along the capital's waterways.

4.2.2 There are some established LCN cycle routes of varying significance in the immediate vicinity. An existing signposted radial route runs along the southern edge of



the site (Lille Road) and a 'recommended' route lies off the north western edge of the area which connects across West Cromwell Road, towards Olympia. The LCN around the Regeneration Area is shown on the following plan.



Figure 3.1: London Cycle Network

4.2.3 However, the Regeneration Area is a notable gap in the existing cycle network in West London. The North End Road, Cromwell Road and the rail corridor present significant barriers to radial and orbital cycle journeys in the vicinity of the area, whilst the Exhibition Buildings and surrounding estate are impermeable to cycle movements across the zone. Consequently, there are no current proposals to improve the cycle network within the Regeneration Area.

4.3 PUBLIC TRANSPORT ACCESSIBILITY

4.3.1 Transport policies place an emphasis on the integration of land use, transport and planning decisions. In particular, the policies stress the need to create more sustainable patterns of development by delivering accessibility.

4.3.2 The accessibility of sites to public transport, particularly those located in London has, since the mid 1990s, been defined by reference to a Public Transport Accessibility Level (PTAL). This methodology identifies an index as a measure of accessibility. This index is expressed as a grade from 1 to 6 where 1 is the lowest and 6 the highest level of accessibility.

4.3.3 The area benefits from high accessibility (up to PTAL 6) with the exception of a PTAL 3 area in the centre of the Regeneration Area. This reduced accessibility arises



due to the lack of permeability across the area and the lack of public transport services currently entering the site due to existing infrastructure.

4.4 BUSES

4.4.1 The existing bus network is shown on Figure 3.2.

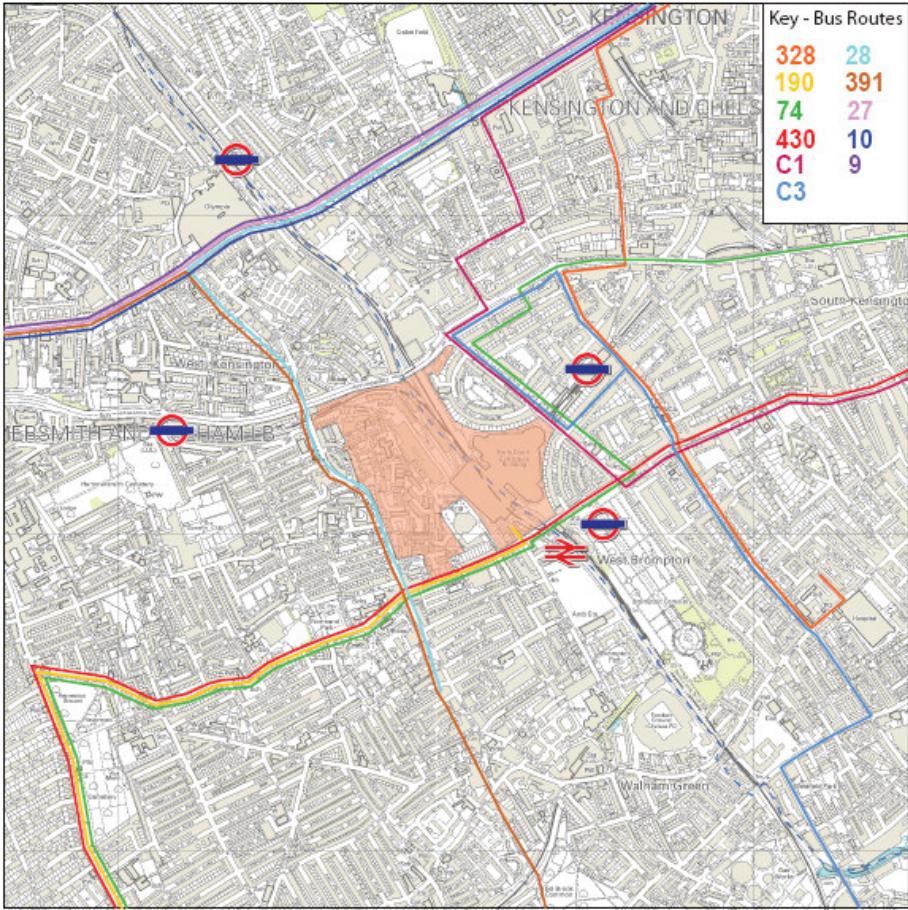


Figure 3.2: Bus Network

4.4.2 The Inner West London bus network was enhanced in late-2006 / early-2007 in order to complement the Western Extension Zone of the London congestion charge scheme. These improvements added a passenger capacity of more than 4,800 in the peak hour, demonstrating the relative ease with which the bus network can be enhanced in a short time scale

4.4.3 However, some bus improvement proposals were frustrated by a lack of bus priority measures and bus standing areas. In addition, the bus priority network around the Regeneration Area is under-developed, with only limited sections of bus lane on North End Road. The lack of bus priority means that services are vulnerable to delays caused by traffic congestion.

4.4.4 A further limitation of the Inner West London bus network is the lack of available land for bus interchanges and operational bus stands. The flexibility of the bus network entails that bus routes have often been established and extended on a “piecemeal” basis, with the result that the network can be fragmented.

4.4.5 For example, around the Regeneration Area there are bus stands:

- between the Empress State Building and Earls Court 2 for the 190 route only;



- at the Warwick Road / West Cromwell Road Tesco for the C3 only;
- at World's End, Chelsea for the 328 only;
- at Notting Hill Gate for the 390 only; and
- near Craven Cottage for the 424 only.

4.4.6 The standard of bus / rail / Underground is also generally poor at the surrounding West Brompton, Earls Court, West Kensington and Kensington Olympia stations.

4.5 RAIL

4.5.1 Rail connections around the Regeneration Area are extensive and provide important links at all geographic scales (local, metropolitan, regional and national) to accommodate increased patronage and are likely to be a main mode of travel for residents, workers and visitors alike.

4.5.2 Understanding the railway services and the connections they offer is key to understanding the way people will access the site in the future. In order to do this Halcrow undertook service analysis at the following stations:

- West Brompton,
- Earls Court,
- West Kensington,
- Kensington Olympia

4.5.3 The following is a list of projects which are likely to feature and have an effect on this project:

- West Coast Main Line timetable change – December 2008/9
- LOROL Service Level 2 timetable (4 trains per hour between Clapham and Willesden/Stratford)
- Interchange with Central Line at White City
- Capacity Improvements on the Piccadilly and District lines
- Southern RUS comments on Gatwick - Watford service and any changes likely to be implemented during the life of the Southern franchise
- LOROL orbital service (2011 for East London Line and later for links to South London)
- Shepherds Bush interchange
- Cross London RUS

4.5.4 On Network Rail, the main constraint to capacity is likely to be the frequency of services on lines that adjoin the West London Line. At the north end of the West London Line (WLL) there are junctions with the North London Line, the Great Western main line (via the South West Sidings route) and the West Coast Main Line (WCML) all of which are heavily used by freight and passenger services. To the south there are two routes to Clapham Junction, a disused route to Waterloo, a route to Victoria via the Battersea reversible line and to the South Eastern network via Factory Junction.

4.5.5 Plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. PPP upgrades due by 2017 are planned for the eastbound Piccadilly and District Lines, as well as the portion of the District Line



between West Brompton and Earl's Court stations, bringing significant relief to each. Providing a new option for those travelling east / west, Crossrail will also assist in further reducing congestion by diverting passengers from the Underground routes in that direction.

4.6 HIGHWAY NETWORK

4.6.1 The Regeneration Area is bounded by the A4 Talgarth Road / West Cromwell Road (to the north), Warwick Road (to the east), North End Road (to the west) and Lillie Road / Old Brompton Road (to the south).

4.6.2 The highway network designations are highlighted on the plan below.

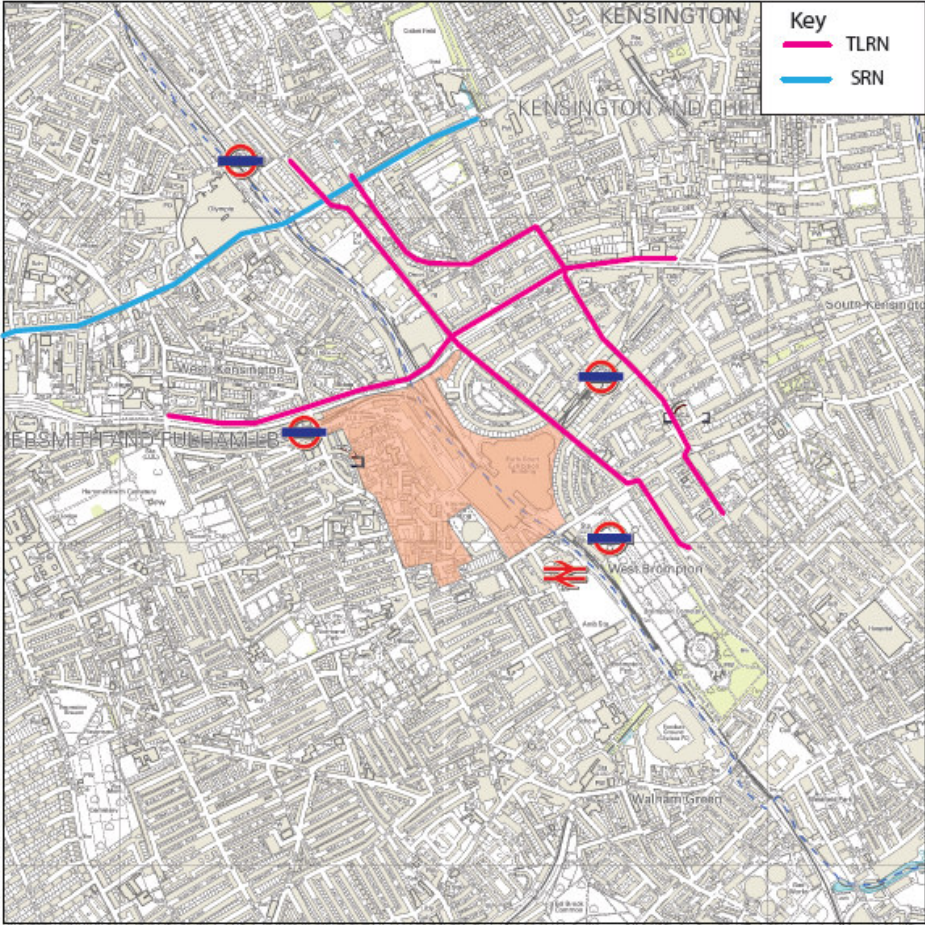


Figure 3.3: Highway Designations

4.6.3 The A4 Talgarth Road / West Cromwell Road and the Warwick Road / Earls Court Road one-way pair all form part of the Transport for London Road Network (TLRN), and the A315 Hammersmith Road / Kensington High Street is part of the Strategic Road Network (SRN).

4.6.4 Weight restrictions are in place on some railway bridges. To the north at Hammersmith Road railway bridge is a 12 tonne restriction. To the south at Fulham Road is a 7.5 tonne restriction. No weight restrictions apply to West Cromwell Road railway bridge. Sections of Lillie Road and the A219 Fulham Palace Road are also subject to a width restriction of 2.1m.

EXISTING TRAFFIC FLOWS



4.6.5 The latest traffic flow information for the AM and PM peaks is presented on the following images, which are based on post-extension survey data gathered by WSP in 2007 and 2008. The traffic surveys were all undertaken during periods when no event was in progress at Earls Court.

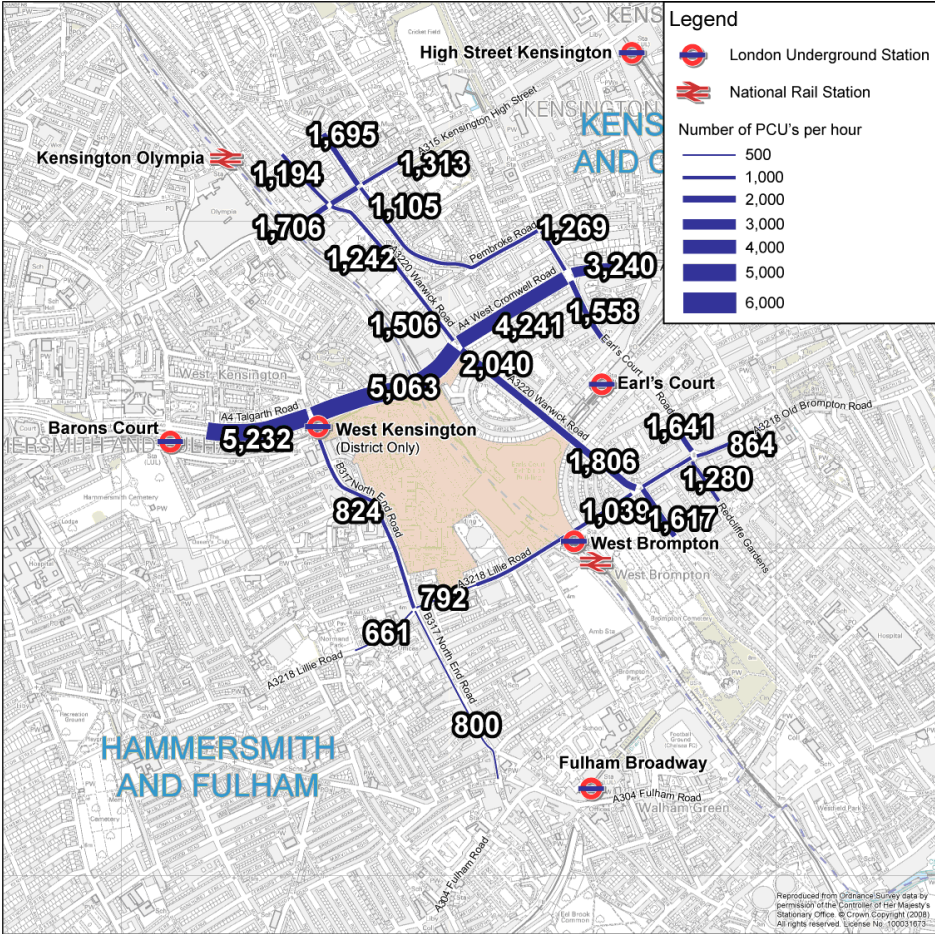


Figure 3.4: AM Peak Hour Traffic Flows (two-way totals)

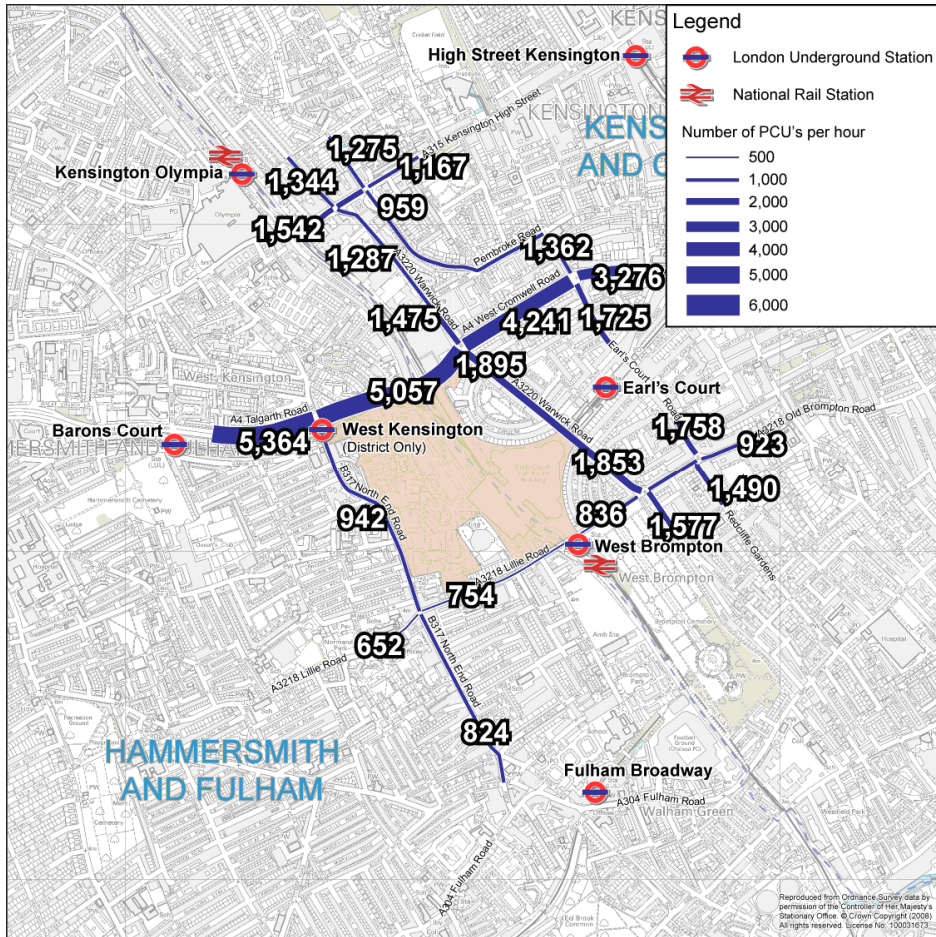


Figure 3.5: PM Peak Hour Traffic Flows (two-way totals)

4.6.6 These Figures show that the dominant movement through the area is east-west through traffic, followed in magnitude by the north-south through traffic. The detail of the individual junction turning movement surveys also shows there is a substantial west-south through movement from the A4, turning right onto Earls Court Road and then continuing south on Redcliffe Gardens. The reverse movement from Finborough Road north to Warwick Road and then turning left onto the A4 westbound is also a dominant movement (half of the Warwick Road traffic approaching the A4 subsequently turns left onto the A4).

EXISTING TRAFFIC GENERATION

4.6.7 The existing traffic movements which are generated by the current uses of the Regeneration Area have been surveyed.

4.6.8 The existing Earls Court exhibition centre traffic movements have been studied in detail with extensive analyses of the exhibition centre servicing and commercial vehicle marshalling procedures. It was found that the existing traffic generation is subject to considerable variation, depending on the events taking place at Earls Court at any one time.

4.6.9 The existing traffic generation therefore varies from a minimum of some 400 vehicles per hour up to around 1000 vehicles per hour. Much of the peak traffic is composed of van and lorry-sized delivery vehicles associated with the build-up and break-down of exhibition events.



EXISTING HIGHWAY CAPACITY

4.6.10 WSP has carried out junction capacity modelling of the key junctions on the local highway network. This initial feasibility exercise has demonstrated areas where there is existing highway capacity, and other areas with scope for improvements. Further junction capacity modelling will be carried out independently by TfL.

4.7 SUMMARY

4.7.1 The Regeneration Area benefits from a high level of public transport accessibility across the majority of the area. The principal shortcoming in the Regeneration Area at the moment is the lack of internal connectivity for all modes of travel for the types and intensity of uses contemplated through redevelopment. The dominance of the road network and presence of railway lines reduce pedestrian connectivity in certain areas. The bus priority network and London Cycle Network is also sparse within the vicinity of the Regeneration Area. The Regeneration Area transport strategy will consider opportunities for addressing these issues in collaboration with relevant local authorities and key stakeholders and is discussed further in Section 5 of this study.



5 Transport Impact

5.1 TRAVEL DEMAND ASSESSMENT

5.1.1 A travel demand forecast has been calculated from the indicative land use budget summarised below.

Table 4.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

5.1.2 Each element of the indicative land use budget has been discussed with the relevant specialist in the Capital & Counties team to ensure that the travel demand assessment is an accurate reflection of the specific forms of development which could come forward in each land use category.

5.1.3 The forecasting exercise has referred to the following information sources and is based on:

- TfL's TRAVL database information;
- trip generation estimates by mode, using data which has been accepted by RBKC, LBHF and TfL recently in respect of other nearby development proposals
- Census Output Area data for nearby locations
- The sustainable transport strategy which is being developed for the Regeneration Area.

5.1.4 Based on these preliminary studies, the total travel demand for the proposed residential, office, hotel and retail uses is likely to be in the region of 20,000 and 19,000 two way person trips in the AM peak and PM peak hours respectively. The modal share for these trips would reflect the accessibility of the area:

- It is predicted that approximately 70% of journeys will be by public transport modes;
- Walking would be the next most significant mode of travel accounting for approximately 16% of journeys (main mode);
- Car driver trips would be minimal accounting for approximately 3% of journeys.

5.1.5 It should be noted that the mix of complementary land uses within the indicative land use budget will reduce the need to travel by providing shopping, and leisure opportunities and social/ community facilities within walking distance of residents living in the area.



5.2 PEDESTRIANS

5.2.1 The land use budget would generate large pedestrian flows, which mostly arise due to people walking between the nearby Earls Court, West Brompton and West Kensington stations and the Regeneration Area.

5.2.2 The key areas to be addressed will be the possible upgrading of station access capacity to cater for these additional pedestrian flows and the provision of high-quality and high-capacity crossing points on pedestrian desire lines which cross busy roads.

5.2.3 The change in pedestrian flows in the wider area beyond the stations will be less significant, but will need to be studied in detail to ensure a satisfactory level of service and upgrading where required.

5.3 CYCLING

5.3.1 The potential demand would result in a large increase above existing cycle flows in the area. This creates a need for high-quality cyclist facilities within the Regeneration Area, including cycle parking, cycle lanes and showering / changing facilities throughout the proposed land uses.

5.3.2 The uplift in cycling demand is such that the off-site cycling network will need to be upgraded in order to provide safe and attractive routes.

5.4 BUSES

5.4.1 Bus demand would also increase significantly, thus generating a need for bus service improvements to add capacity to the network and for on-site and off-site bus priority and other infrastructure to improve the attractiveness of bus travel.

5.4.2 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider – local and metropolitan – transport network and to providing sustainable transport options.

5.4.3 On-site facilities should include modern bus interchanges which link with the tube and train stations to improve the integration of public transport journeys, plus dedicated on-site bus lanes to improve journey times and the reliability of bus journeys relative to car travel. These should be considered alongside bus improvements to the surrounding area.

5.5 RAIL

5.5.1 As discussed in Section 3.5, a number of plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. Collectively these improvements create the significant new rail capacities necessary to ensure the full redevelopment of the Regeneration Area given its central location and proposed future as a sustainable mixed use district and can accommodate, with some modifications, the movement demands anticipated.

5.5.2 Specific improvements over and above those already contemplated under the PPP and Crossrail initiatives may be required in the AM peak inbound to add service to the West London line and to relieve inbound congestion on the District Line from Putney. Halcrow has developed a number of supporting plans and new base timetable that will allow increased demand to be catered for.

5.6 HIGHWAY NETWORK

5.6.1 The potential net impact on the highway network has been forecast within a range, which depends on whether it is compared against an existing event taking place



at Earls Court Exhibition Centre, or whether it is considered against the situation where Earls Court Exhibition Centre is not in use.

5.6.2 For the existing situation where a large event takes place at Earls Court Exhibition Centre, the forecast shows an overall 2% reduction in traffic on the surrounding road network. This is due to the high traffic generation of existing Earls Court Exhibition Centre shows, especially for the build-up and break-down periods where high volumes of large exhibitors' vehicles access the EC 1+ 2 site. The indicative land use budget would generate less traffic than the existing large Earls Court Exhibition Centre events.

5.6.3 When the comparison is based on a scenario where there is no event at Earls Court Exhibition Centre, the outcome is a 2% increase in traffic across the surrounding road network. There is scope for this level of traffic impact to be accommodated, subject to highway capacity improvements, traffic signal re-timing and better traffic management.

5.7 SUMMARY

5.7.1 The indicative land use budget is anticipated to result in approximately 20,000 and 18,700 two way person trips in the AM and PM peak hours respectively. The increased demand resulting from the indicative land use budget could be accommodated through infrastructure improvements across the local transport network.



6 Transport Strategy

6.1 OVERVIEW

6.1.1 The high-level objectives of the Regeneration Area sustainable transport strategy are:

- to mitigate existing transport problems;
- increase accessibility across the area; and
- to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings.

6.1.2 Possible measures to deliver the high level objectives listed above are discussed in detail below. These measures would contribute to both RBKC's and LBHF's aspirations for the development of the Earl's Court area as set out in Section 3.4.

6.1.3 Underpinning the transport strategy is the concept of complementary land uses which have the potential to achieve the PPG13 aims of promoting mixed use development in city, town and district centres, and near to major public transport interchanges in order to achieve vitality and diversity and promote walking as a primary mode of travel.

6.1.4 The proposed transport measures will perform best if they are implemented and managed in an integrated manner, and their effects monitored and reviewed as the development progresses.

6.1.5 The transport strategy will be designed to deliver the long term governance of the transport proposals, maximising their effectiveness in relation to the proposed land uses and the surrounding area, incentivising the achievement of sustainable travel patterns, and delivering the transport outcomes required for the development. The transport strategy will be discussed extensively with TfL, the Boroughs and other stakeholders.

6.2 WALKING & CYCLING

6.2.1 It is recognised that physical aspects of new development will influence travel patterns and can reduce dependence upon the private car. An integral part of promoting sustainable travel will therefore be the design of the development which should prioritise cyclists and pedestrians.

6.2.2 A network of connections could link roads, pedestrian connections and pathways leading to important destinations, such as the Underground stations, major public open spaces and shopping, and connect the area to adjacent neighbourhoods. Extensions to the London Cycling Network should be an integral feature of this network. The design of the overall network should provide a hierarchy of connections, the logic of which can easily be understood by residents as well as visitors. The elements of the network (roads, pathways, etc) should provide sufficient space and a public realm to ensure a comfortable walking or cycling experience. The routes should be well-maintained and legible with lighting, signage and the use of quality materials.

6.2.3 Additional measures that could be considered include:

- Cycle parking in excess of planning standards;



- A bike zone, with public cycle hire and maintenance facilities; and
- Electric charging points for powered cycles, based on renewable energy sources such as solar.

6.2.4 In February 2008, the Mayor announced a new programme aimed at achieving a growth in cycling of 400 percent by 2025. This would mean that five percent of all trips in London were made by bike. The three strands of the programme are:

- Bike hire in central London, providing a new public transport mode for short business and visitor trips;
- Cycling corridors, offering commuters with high profile, clearly signed priority routes from inner to central London; and
- Bike Zones, covering a radius of about 5km around London's town centres, incorporating 20mph speed limits, cycle priority streets, greenways and a network of cycle-friendly routes to link schools, stations, residential areas and workplaces, supported by cycle training, parking and travel planning.

6.2.5 The location and land use patterns in the Regeneration Area have potential to benefit from the proposed cycling corridors and Bike Zones.

6.3 BUSES

6.3.1 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider transport network and to providing sustainable transport options. The following initiatives should be further explored as ways of achieving these objectives:

- Create / improve interchange between buses, rail and underground at West Brompton, Earls Court and West Kensington;
- Create a new on-site bus interchange and extend the surrounding bus routes into the site;
- Create through-routes for buses, with on-site bus priority;
- Propose off-site bus priority and infrastructure improvements;
- Increase the frequency of existing bus services; and
- Propose bus links to key locations and areas which lack a tube or rail connection, such as the Kings Road area and other poorly-served areas of both Boroughs.

6.4 RAIL

6.4.1 Halcrow has undertaken extensive work to consider a number of alternative measures that could be delivered to avoid any potential hotspots on the network and improve capacity on the West London Line (WLL), including the possible introduction of a new base timetable to accommodate the increased demand.

6.4.2 A preferred option would be providing additional services from Clapham Junction to Shepherd's Bush, turning around at North Pole Depot with an extension to Watford to offer a frequent service on the WLL and additional hourly connection with the West Coast Main Line.

6.5 HIGHWAY NETWORK

6.5.1 The proposals will seek to contribute to the aspirations that both RBKC and LBHF has for the area by providing strategic benefits for the highway network through its design. The specific alignments and connectivity of any future road system would be



dependent on the character of the redevelopment; however the following measures would be considered:

- Assessment of any contribution (as required and related to the development) to the tackling the Earls Court One-Way system;
- Provide a north/ south route through the Regeneration Area, which has the capacity to relieve through traffic from both directions of the Earls Court One-Way system. Initial assessments have indicated that the level of relief could be sufficient to achieve :
 - reduced traffic impact
 - improved local air quality
 - reduced community severance
 - improved pedestrian and cyclist conditions
 - improved bus facilities
 - better on-street loading and parking for local businesses;

This concept would need to be assessed in further detail and its implementation would be dependent on extensive consultation and the progress of statutory procedures. The phasing of its delivery relative to other elements of the Regeneration Area would need to be considered carefully

- Improvements to the A4 / North End Road junction to provide an opportunity to improve bus/tube interchange at West Kensington station and increase capacity where possible for north-south traffic and for movements into the area;
- Reduce impact on local roads by providing direct access from the A4;
- Locate accesses at existing points (e.g. the Earls Court, West Brompton and Lillie Road forecourts) and at existing side roads from North End Road which have potential to be connected into the area;
- Provide a separate service road under raised parts of the development. There are potential alignments that could follow the main north / south track corridor; one could run north from Lillie Road at the bridge location to the west of the tracks. Further detailed studies would be undertaken in association with a specific development proposal to determine the alignments and design of these routes;
- Consider the potential for an Urban Consolidation Centre (UCC) to reduce service vehicle movements in the area, with on-site electric-powered vehicles to distribute goods around the Regeneration Area with zero carbon impact.
- Develop Travel Demand Management (TDM) measures in liaison with the project partners and planning authorities, such as:
 - Potentially promoting low-emission Car Clubs on the sites
 - encouraging public transport, walking and cycling
 - adopting parking ratios below the maximum standards, and controlling off-site parking impacts
 - implementing Travel Plans for the residential and commercial uses
 - personalised travel planning;
- Promote a Low Emission Strategy, in line with the Beacon Councils Air Quality Group recommendations (RBKC is a member of this Group); and



-
- Examine the potential for electric car charging stations based on renewable energy sources such as solar.

6.6 SUMMARY

6.6.1 The transport strategy for the Regeneration Area will contain a package of measures to encourage local travel and travel by sustainable modes. The developer will work with local stakeholders and local authorities in preparing and implementing the strategy as a masterplan for the Regeneration Area progresses. Measures that could potentially be included in the strategy have been considered above. However, the specific measures will be dependent on the character of the redevelopment with due consideration to the Borough’s aspirations for the area.

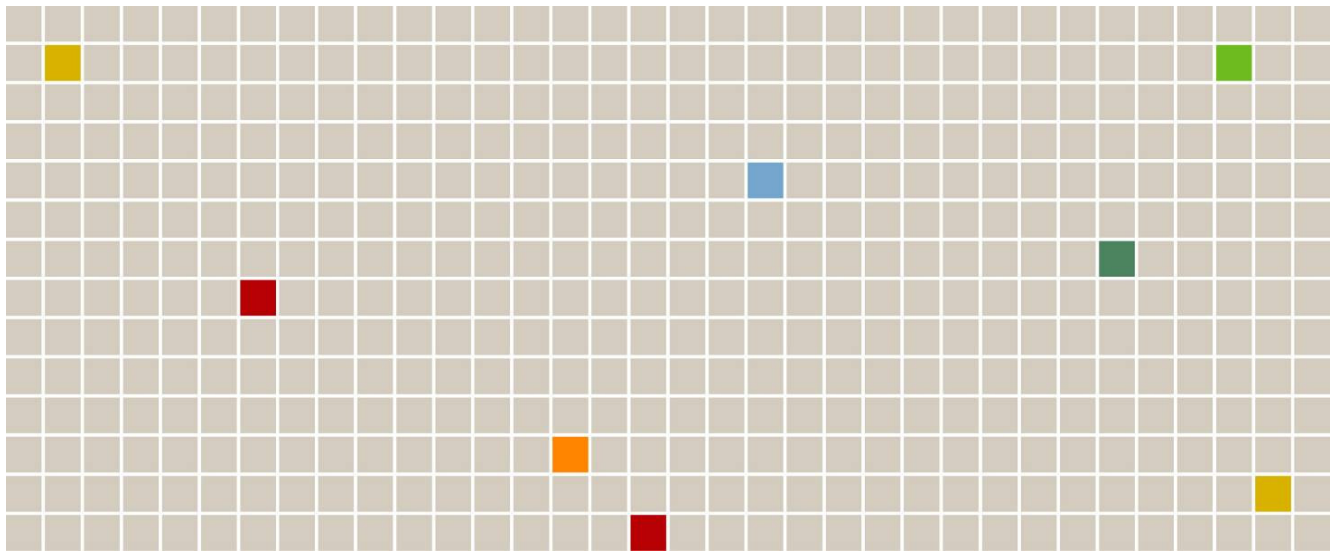


7 Conclusions

7.1.1 This Summary Transport Study is a technical evidence base document which supports the Earls Court Regeneration Area. The study has considered the transport implications of an indicative land use budget for the Regeneration Area.

7.1.2 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

7.1.3 The provision of additional transport infrastructure to support the Regeneration Area would be complemented by a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and minimise car dependency, in line with national, regional and local policy aims. These measures have the potential to improve a number of existing transport issues in RBKC and LBHF and will be developed as a Masterplan for the Regeneration Area evolves.



Earls Court Regeneration Area Core Strategy Evidence Base Summary Transport Study

Capital & Counties on behalf of Earls Court and
Olympia Group

June 2009





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1 Executive Summary

1.1.1 This technical report provides evidence in support of the Earls Court Regeneration Area in relation to transport matters.

1.1.2 The Earls Court Regeneration Area covers 27 hectares and comprising:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

1.1.3 The indicative land use budgets assessed in this report are based on 1,380,000 to 1,640,000 sq m of development comprising a comprehensive mix of complimentary land uses to provide a sustainable community for the area.

1.1.4 The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study would therefore be subject to further review as any development proposals progress.

1.1.5 Most of the Regeneration Area benefits from a high level of public transport accessibility and there is scope to improve this further. Regeneration of this area is in line with planning policies that seek to locate major new developments in proximity to transport infrastructure. The transport implications of the indicative land use budget have been assessed and are reflected in the transport strategy considered in this study.

1.1.6 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

1.1.7 The transport strategy will include a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and reduce car dependency, in line with national, regional and local policy aims. The proposals support the Borough’s aspirations for the area and will provide strategic benefits to the transport network by helping to tackle a number of existing issues which have been identified in the draft Core Strategy.

1.1.8 The transport strategy aims to mitigate existing transport problems, increase accessibility across the Regeneration Area and to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings. Subject to the outcome of the core strategy consultation, it is the intention to develop the transport strategy in close liaison with RBKC, LBHF, TfL and other stakeholders as the Core Strategy and the masterplanning process move forward.

1.1.9 Based on the indicative land use budget, the development proposals are anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. The increased demand resulting could be accommodated through infrastructure improvements across the local transport network.

1.1.10 The indicative land use budget would generate less traffic than existing large Earls Court Exhibition Centre events

2 Introduction

2.1 SCOPE OF STUDY

2.1.1 WSP and Halcrow have been appointed to advise Capital and Counties on behalf of the Earls Court and Olympia Group on the transport aspects of a potential redevelopment of the Earls Court Regeneration Area. This study forms part of the evidence base for the Regeneration Areas. The Regeneration Area comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.2 The summary study considers the transport implications of a potential development scenario on the transport infrastructure in the vicinity of the Earls Court Regeneration Area, which covers 27 hectares and comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.3 For the purpose of the technical analyses in this study, an indicative land use budget of 1,380,000 to 1,640,000 sq m has been assumed for the Regeneration Area. The breakdown of this overall total is provided in Table 1.1. The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study will therefore be subject to further review as masterplanning and any development proposals progress

Table 1.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

2.2 REPORT STRUCTURE

2.2.1 This study provides an initial technical briefing, which will in due course inform any future masterplanning process. It sets out the potential transport issues, constraints and opportunities for the Regeneration Area drawing on work undertaken to date and the findings of preliminary studies of the existing situation. It also provides suggestions for the development of a sustainable transport strategy to build on the significant potential of the area to deliver a highly sustainable development. The remainder of the study is set out as follows:



-
- Section 1 is an Executive Summary
 - Section 2 is an Introduction to the context of the summary study
 - Section 3 provides an overview of relevant transport policy in relation to the site;
 - Section 4 reviews the existing transport infrastructure in the vicinity of the site;
 - Section 5 considers the potential transport impacts based on the indicative land use budgets;
 - Section 6 discusses the potential Regeneration Area transport strategy; and
 - Section 7 concludes and summarises the findings of this study.



3 Policy Overview

3.1 NATIONAL

3.1.1 The Government's over-arching strategy is set out in Planning Policy Guidance Note 13 (PPG13), which emphasises the key themes of sustainable development. The document reinforces the message that there must be greater integration of planning and transport in order to promote more sustainable transport choices and reduce the need to travel, especially by private car.

3.1.2 The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices and to promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling. It therefore advocates:

- actively managing the pattern of urban growth to make the fullest use of public transport;
- increased intensity of development at locations which are highly accessible by public transport, walking and cycling;
- reducing the amount of parking in new developments, as part of a package of planning and transport measures to promote sustainable travel choices;
- promoting mixed use development, which can provide very significant benefits in terms of vitality and diversity and in promoting walking as a primary mode of travel;
- producing a broad balance at the strategic level between employment and housing, to minimise the need for long distance commuting;
- focussing mixed use development involving large amounts of employment, shopping, leisure and services in city, town and district centres, and near to major public transport interchanges (see paragraph 20); and
- encouraging a mix of land uses, including housing, in town, suburban and local centres.

3.2 REGIONAL

THE LONDON PLAN (CONSOLIDATED WITH ALTERATIONS SINCE 2004)

3.2.1 The Plan sets out policies to help London manage significant growth in London's population and jobs. In terms of transport and development, the key themes are:

- encouraging proposals for large residential developments in areas of high public transport accessibility, including the provision of suitable non-residential uses within such schemes;
- encouraging patterns and forms of development that reduce the need to travel especially by car;
- seeking to improve public transport capacity and accessibility where it is needed;
- supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity; and



- ensuring that on-site car parking at new developments is the minimum necessary, with no over-provision that could undermine the use of more sustainable non-car modes.

A NEW PLAN FOR LONDON (APRIL 2009)

3.2.2 In July 2008 a consultation document 'Planning for a Better London' was published outlining the approach that was proposed to the revision of the London Plan. The next stage of this review is the publication of 'A New Plan for London'. It is intended that the new London Plan would be completed in around four years, with various supplementary planning documents being issued in the meantime.

3.2.3 Pages 61 to 65 of A New Plan for London discuss policy considerations related to London's Transport networks. It states the following objective;

- *A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan.*

3.2.4 Reference is also made to a co-ordinated approach to land use and transport planning stating:

- *Close co-ordination of the provision of transport infrastructure and services with land use development is essential to support London's continued development and growth. Good public transport access will not in itself guarantee development but it is a necessary condition for a successful city – one in which everyone has easy, safe and convenient access to jobs, opportunities and facilities.*

3.2.5 There is also an emphasis on delivering reduced congestion within London's streets and providing environments suitable for all users It states:

- *London's streets perform a variety of functions – they should provide a safe and pleasant means of travelling on foot, by cycle, bus or car; and act as a network of attractive public spaces in which people can interact. The new Plan will emphasise facilitating essential access for people, goods and services, and give strong support for cycling, walking and taking the bus – in town centres, other parts of Outer London and across central London.*

3.2.6 Page 64 states that in reviewing the London Plan the Mayor proposes to:

- *Develop a new, criteria based, approach to road schemes which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve;*
- *Tackle congestion and traffic reduction, including investigating road user charging in the future;*
- *Allocate street space in line with MTS priorities, including shared space, where appropriate, (taking account of the safety of all pedestrians, particularly visually impaired people); improve conditions for buses; and investigate coach hubs;*
- *Substantially strengthen policy on walking and support the "Legible London" initiative;*
- *Put in place strong policies supporting cycling, with reference to the Velib cycle rental scheme and cycling superhighways;*
- *Develop new cycle parking standards; and*
- *Strengthen policy on public realm enhancements.*



THE MAYOR'S TRANSPORT STRATEGY 2001

3.2.7 This document supports the Mayor's vision of London as an exemplary sustainable world city. The Transport Strategy aims to increase the capacity, reliability, efficiency, quality and integration of London's transport system to provide the world class transport system the capital needs. The ten key transport priorities which flow from this are:

- reducing traffic congestion;
- overcoming the backlog of investment in the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services;
- making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing the frequency of services;
- better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London wide, high frequency 'turn up and go' Metro service;
- increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving access to international transport facilities; improved orbital rail links in inner London; and new Thames river crossings in east London;
- improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice;
- supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better maintenance of roads and bridges, and improved co-ordination of streetworks;
- making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts;
- improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion; and
- bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environment.

MAYOR'S TRANSPORT STRATEGY – STATEMENT OF INTENT (MAY 2009)

3.2.8 A new transport strategy is currently under consultation with the London Assembly and GLA Group, prior to a full draft which will be subject to public consultation in Autumn 2009. Publication of the final new strategy is scheduled for early 2010.



3.2.9 The draft principles are largely in line with the current Transport Strategy, but with more emphasis on the transport needs and viability of Greater London as a whole rather than focusing on Central London. Key themes include: ensuring a lasting transport legacy at the Olympic and Paralympics Games venues including Earls Court; improving transport opportunities with significant investment in public transport, walking, cycling; and tackling climate change through measures, such as, ensuring at least 20 percent of parking spaces in new developments have charging points for electric vehicles.

3.2.10 The existing proposals largely relate to the projects and proposals already committed to in TfL's nine-year Business Plan. In addition, they also include those improvements to the National Rail network to be delivered by Network Rail and the Government up to 2014, as part of the current High Level Output Specification Control Period 4 funding package, and by other major agencies (e.g. BAA and the Highways Agency) delivering transport improvements impacting on London.

3.2.11 The document also confirms the Mayor's intention to remove the Western Extension Zone (WEZ) of the Congestion Charging zone, following a non-statutory consultation with the public and stakeholders. In the future, wider road user charging may be explored in the context of a national scheme and charging in town centres may also be considered. Other measures, such as, upgrading signal control junctions, improving the management of roadworks and road enhancements will be used to mitigate the effects of the removal of the WEZ.

LONDON FREIGHT PLAN (OCTOBER 2007)

3.2.12 The London Freight Plan sets out the steps that should be taken over the next five to ten years to identify and begin to address the challenge of delivering freight sustainably in London.

3.2.13 The Plan has no statutory force, but has been developed to implement the Mayor's Transport Strategy, and is a material consideration for planning. The same principles underpin the Mayor's Transport Strategy.

3.2.14 The specific policy aims are to:

- Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing in order to support London's economy;
- Minimise the adverse environmental impact of freight transport and servicing in London;
- Minimise the impact of congestion on the carriage of goods and provision of servicing and;
- Foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practicable.

3.3 LOCAL

RBKC ADOPTED POLICY

3.3.1 The 2002 Unitary Development Plan (UDP) recognises that many of the transport-related issues affecting RBKC need to be viewed and resolved in a London-wide context, as well as reflecting residents' interests. It also acknowledges that solutions to many transport challenges require a coordinated, strategic approach by government and its agencies, transport authorities and transport providers and operators.



3.3.2 It proposes an effective transport system that is integrated with land-use planning and is based on patterns of land-use which reduce the need to travel and promote the use of public transport, walking and cycling as alternatives to the private car.

3.3.3 RBKC has formulated eight principal strategic policies within the former UDP. In the revised UDP, the number of principal strategic policies has reduced to three and those relating to transport issues are:

- STRAT 5: To ensure that further visitor related development locates in places that are well served by public transport and does not harm the residential character or amenity of the Borough.
- STRAT 7: To promote sustainable development through locating high trip generating uses in areas which are or will be well served by public transport and by encouraging the local provision of services and facilities to reduce the need to travel.

3.3.4 RBKC has adopted the following objectives for transport in the Borough:

- locate high trip-generating activity in areas well served by public transport;
- improve access to all land uses, especially for those with special mobility needs through the efficient use of the transport network;
- reduce the need to travel and, in particular, the number and length of motor vehicle trips by ensuring that development is located appropriately;
- promote measures to reduce the need to travel;
- reduce overall levels of road traffic in the Borough;
- reduce air pollution from road traffic and the noise nuisance caused by transport;
- increase the proportion of journeys made on foot and by bicycle;
- improve public transport so it is more convenient and reliable to use, is better able to meet demand and is attractive as an alternative to the private car;
- reduce the number and severity of road accident casualties;
- minimise the adverse effects of traffic in the Borough, particularly on the environment of residential areas and shopping centres;
- ensure that development does not add to on-street parking stress, in particular where demand is already saturated; and
- ensure that changes to the transport infrastructure improve the Borough's townscape.


3.3.5 These objectives are reflected in strategic transport policies STRAT 25, STRAT 26, STRAT 29 and STRAT 35.

3.3.6 Policy TR28 states that RBKC will:

“resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough’s Road Network.

Consideration may be given to limited additional highway provision where there will be no overall opportunity to increase the volume of traffic passing through the Borough. Actual proposals are likely to be limited but where proposals are advanced, complementary traffic management schemes will be designed to limit the possibility of adding to traffic volumes.

The Council, however, has supported, for a long time, road proposals that could provide some relief to the Earls Court one-way system. This support should also extend to



signage changes to re-route long distance traffic from these roads, which are linked with the Council's desire to see the Earl's Court One-Way System and the Embankment removed from London's Strategic Road Network. The Council supports means of improving the access to Earls Court Exhibition Centre, in order to reduce the number of commercial vehicles and coaches from the residential areas around Earls Court. The Council has supported an access road for lorries running north of the Centre, alongside the West London Line and beneath the West Cromwell Road, linking with Warwick Road."

RBKC DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.7 Section 5 of the "Places" draft Core Strategy document highlights a number of existing transport issues in the Earl's Court area:

- *"...the quality of the town centre [on Earl's Court Road] is shattered by the one-way south bound traffic, which forms part of the Earl's Court One-Way System (para 5.1.2);*
- *The One-Way System travels north up Warwick Road, and degrades the residential environment of that street (para 5.1.2);*
- *Cromwell Road also acts as a significant barrier to pedestrians (para 5.1.2);*
- *...using buses can be confusing because of the One-Way System (para 5.1.4);*
- *The One-Way System also makes for a poor pedestrian environment (para 5.1.4);*
- *There is at present no easy way to get from the Exhibition Centre to the Town Centre (para 5.1.6); and*
- *Air quality is a concern in the area due to pollution from traffic(para 5.8.1)"*

3.3.8 The document also sets out the aspirations and vision that RBKC has for the future development of the Earl's Court area. The key aspirations relating to transport are:

- *" unravelling the One-Way System (para 5.1.8);*
- *...reducing the traffic flow (para 5.1.8);*
- *...offering an attractive "urban-village" environment (para 5.1.8);*
- *...new good direct connection to the Exhibition Centre (para 5.1.8);*
- *Streetscape and pedestrian improvements to Cromwell Road...making it more pleasant for pedestrians and residents and marking the arrival of the A4 in Central London (para 5.1.8);*
- *Pedestrian movement across West Cromwell Road will be improved, particularly at the junction with Warwick Road (para 5.2.1);*
- *A new north-south link to the west of the railway line (para 5.2.1);*
- *...an improved public transport interchange between West Brompton station and Earl's Court station (para 5.2.2);*
- *... reduction and rationalisation of street clutter (para 5.7.1); and*
- *...support the reinstatement of two-way working and significant enhancements to the streetscape (para 5.7.2).*

LBHF ADOPTED POLICY

- UDP Policy G4 sets out the LBHF transport objectives as:



- development will be guided to locations that minimise the need to travel, and will be required to incorporate access arrangements that encourage the use of sustainable modes of travel and transport;
- the intensity of development will be related to accessibility by public transport, with new development expected to promote traffic restraint and reduction, so as to reduce congestion and air pollution and to avoid the need for increased road capacity;
- land use provision for improvements to the road network will only be made where necessary in the interests of traffic safety or maintaining the free flow of essential traffic;
- the siting, design and layout of development will be required to provide:
 - easy access by disabled people
 - safe, secure and direct access by pedestrians
 - facilities to encourage travel to and from the development by cycling and other sustainable modes of travel and transport.
- measures will also be sought, in connection with development proposals, to:
 - secure necessary improvements to, and development of, public transport systems and services, including additional stations on the West London Line;
 - ensure that road safety is not compromised and that the free flow of essential traffic is maintained;
 - minimise vehicle parking demand both by controlling the amount of on-street parking provision and by securing the introduction of complementary parking controls and traffic management measures to control off-site parking;
 - to promote the use of rail and water for freight transport;
 - protect residential areas and main shopping streets from the environmental impact of traffic generated by development proposals.

3.3.9 Policy TN8 defines a hierarchy of roads in LBHF and explains that developments will not be permitted if they hamper the ability of these roads to provide safe and effective access.

3.3.10 Policy TN13 notes that all developments will be assessed for their contribution to traffic generation and their impact on congestion.

3.3.11 Policy TN28 on freight movements, seeks to:

'Encourage and support the confinement of heavy lorries to suitable routes and their exclusion from unsuitable roads, other than for final access to premises.'

3.3.12 The justification to this policy recognises the importance of freight for the local economy, and the potential conflict with the quality of the local environment. The management of freight routes is seen as one way that this can be achieved.

LBHF DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.13 The Core Strategy Options document for the London Borough of Hammersmith and Fulham (LBHF) was put out to consultation on the 5th June 2009. This document makes reference to the following in the context of the Earl's Court area.

3.3.14 In Section 4, Issues Opportunities and Constraints:



- *...Earls Court...are major opportunity areas because they not only have substantial development potential but because they have very high existing public transport accessibility (para 4.104);*

3.3.15 In section 5, Spatial Vision:

- *... We will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment. Where we do not control the roads, for example the busy A4 and A40, we will have worked with our partners, particularly Transport for London to achieve these aims. We will also have worked with partners to improve transport in the borough, particularly north south links, as well as the opportunities for cycling and walking. Where there is major development we will have improved access, particularly for pedestrians and cyclists (para 5.17);*

3.3.16 In section 7, Key Spatial Options for Delivering the Council's Vision it is stated that:

- *The Council has a key objective to create decent neighbourhoods, regenerate town centres and the most deprived parts of the borough, particularly White City, West Kensington/Earls Court/North Fulham and Hammersmith and to reduce polarisation and worklessness to create more stable, mixed and balanced communities where people can live, work and prosper (para 7.3)*
- *We think the West London Line is capable of running services to a much higher level to help unlock regeneration potential(para 7.8)*

3.3.17 Within Section 8, consideration is given to the appropriate development type in the Earls Court Regeneration Area. Within this section it is stated that:

- *The area is highly accessible to public transport, being close to West Brompton Station which is on the District and West London Lines and to Earls Court Station, on the District and Piccadilly Lines. Although there is little spare capacity on these lines at peak times, some improvements will take place with the future plans of Transport for London. The highway network in the area is congested through the town centre (past the street market) and south of the A4. (para 8.95)*
- *Employment creation to more than replace the potential loss of the exhibition centre (para 8.111)*



4 Baseline Conditions

4.1 WALKING AND CYCLING

4.1.1 Transport policies at all levels encourage walking and cycling as being the most sustainable and low-impact modes of travel. PPG13 highlights the potential for walking to replace short car trips, especially for journeys under 2km. It also notes that cycling has the potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

WALKING

4.1.2 According to the Mayor of London's website, almost seven million walking journeys on foot are made in London every day and walking accounts for 80 percent of all trips under one mile. Walking is a cost effective, accessible, healthy and enjoyable form of travel, and is a compulsory element of any journey.

4.1.3 The Walking Plan for London – '*Making London a walkable city*' was published by the Mayor in February 2004 to promote walking. The Plan adopts the 'the 5 'Cs' from the London Planning Advisory Committee (LPAC) Walking Strategy for London as key indicators of walkability which are; Connected, Convivial, Conspicuous, Comfortable and Convenient.

4.1.4 The principal shortcomings in the Regeneration Area are the poor pedestrian environment along the A4 and the relative impermeability of the pedestrian network across the West London Line and through the privately-owned Earls Court and Olympia sites.

4.1.5 As there is no direct through route from the LBHF Site to the town centre, residents currently need to use the A4 West Cromwell Road to access Earls Court Road. For example, from Gibbs Green Close (part of the LBHF site) to the junction of Earls Court Road/Nevers Place; the crow fly distance is approximately 815m equivalent to a 10 minute walk whilst the distance walking along the accessible streets would be approximately 1.3 kilometres equivalent to a 16 minute walk

4.1.6 Warwick Road is a predominately residential street with the exception of the Exhibition Centre with good, well maintained and lit footways. Informal crossing points including tactile paving to facilitate north-south movement. There are signalised pedestrian crossings at its junction with the A4 West Cromwell Road and Old Brompton Road and between the tube station and Exhibition Centre. There is, however, a lack of crossing points at intermediate locations along the street which would facilitate crossing movements between the footways along either side.

4.1.7 The A4 is a significant barrier to pedestrian movement; a complicated multi-stage pedestrian crossing is provided at the A4 West Cromwell Road/Warwick Road junction to negotiate the multiple lanes of traffic on a very wide carriageway.

4.2 CYCLING

4.2.1 The London Cycle Network (LCN) is a network of signed routes for cyclists across the capital. Over 550km of the 900km network has been completed to date; final completion is due by the end of 2010. TfL are also investing in an off-road network of routes through London's parks, and along the capital's waterways.

4.2.2 There are some established LCN cycle routes of varying significance in the immediate vicinity. An existing signposted radial route runs along the southern edge of



the site (Lille Road) and a 'recommended' route lies off the north western edge of the area which connects across West Cromwell Road, towards Olympia. The LCN around the Regeneration Area is shown on the following plan.



Figure 3.1: London Cycle Network

4.2.3 However, the Regeneration Area is a notable gap in the existing cycle network in West London. The North End Road, Cromwell Road and the rail corridor present significant barriers to radial and orbital cycle journeys in the vicinity of the area, whilst the Exhibition Buildings and surrounding estate are impermeable to cycle movements across the zone. Consequently, there are no current proposals to improve the cycle network within the Regeneration Area.

4.3 PUBLIC TRANSPORT ACCESSIBILITY

4.3.1 Transport policies place an emphasis on the integration of land use, transport and planning decisions. In particular, the policies stress the need to create more sustainable patterns of development by delivering accessibility.

4.3.2 The accessibility of sites to public transport, particularly those located in London has, since the mid 1990s, been defined by reference to a Public Transport Accessibility Level (PTAL). This methodology identifies an index as a measure of accessibility. This index is expressed as a grade from 1 to 6 where 1 is the lowest and 6 the highest level of accessibility.

4.3.3 The area benefits from high accessibility (up to PTAL 6) with the exception of a PTAL 3 area in the centre of the Regeneration Area. This reduced accessibility arises



due to the lack of permeability across the area and the lack of public transport services currently entering the site due to existing infrastructure.

4.4 BUSES

4.4.1 The existing bus network is shown on Figure 3.2.

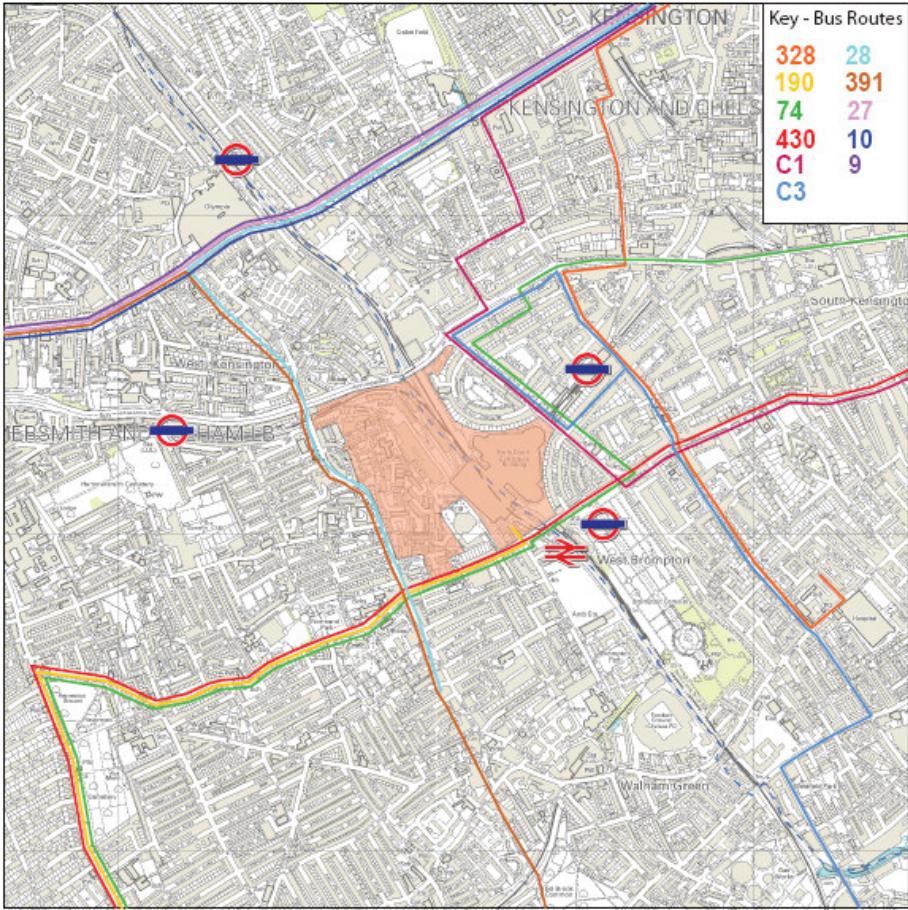


Figure 3.2: Bus Network

4.4.2 The Inner West London bus network was enhanced in late-2006 / early-2007 in order to complement the Western Extension Zone of the London congestion charge scheme. These improvements added a passenger capacity of more than 4,800 in the peak hour, demonstrating the relative ease with which the bus network can be enhanced in a short time scale

4.4.3 However, some bus improvement proposals were frustrated by a lack of bus priority measures and bus standing areas. In addition, the bus priority network around the Regeneration Area is under-developed, with only limited sections of bus lane on North End Road. The lack of bus priority means that services are vulnerable to delays caused by traffic congestion.

4.4.4 A further limitation of the Inner West London bus network is the lack of available land for bus interchanges and operational bus stands. The flexibility of the bus network entails that bus routes have often been established and extended on a “piecemeal” basis, with the result that the network can be fragmented.

4.4.5 For example, around the Regeneration Area there are bus stands:

- between the Empress State Building and Earls Court 2 for the 190 route only;



- at the Warwick Road / West Cromwell Road Tesco for the C3 only;
- at World's End, Chelsea for the 328 only;
- at Notting Hill Gate for the 390 only; and
- near Craven Cottage for the 424 only.

4.4.6 The standard of bus / rail / Underground is also generally poor at the surrounding West Brompton, Earls Court, West Kensington and Kensington Olympia stations.

4.5 RAIL

4.5.1 Rail connections around the Regeneration Area are extensive and provide important links at all geographic scales (local, metropolitan, regional and national) to accommodate increased patronage and are likely to be a main mode of travel for residents, workers and visitors alike.

4.5.2 Understanding the railway services and the connections they offer is key to understanding the way people will access the site in the future. In order to do this Halcrow undertook service analysis at the following stations:

- West Brompton,
- Earls Court,
- West Kensington,
- Kensington Olympia

4.5.3 The following is a list of projects which are likely to feature and have an effect on this project:

- West Coast Main Line timetable change – December 2008/9
- LOROL Service Level 2 timetable (4 trains per hour between Clapham and Willesden/Stratford)
- Interchange with Central Line at White City
- Capacity Improvements on the Piccadilly and District lines
- Southern RUS comments on Gatwick - Watford service and any changes likely to be implemented during the life of the Southern franchise
- LOROL orbital service (2011 for East London Line and later for links to South London)
- Shepherds Bush interchange
- Cross London RUS

4.5.4 On Network Rail, the main constraint to capacity is likely to be the frequency of services on lines that adjoin the West London Line. At the north end of the West London Line (WLL) there are junctions with the North London Line, the Great Western main line (via the South West Sidings route) and the West Coast Main Line (WCML) all of which are heavily used by freight and passenger services. To the south there are two routes to Clapham Junction, a disused route to Waterloo, a route to Victoria via the Battersea reversible line and to the South Eastern network via Factory Junction.

4.5.5 Plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. PPP upgrades due by 2017 are planned for the eastbound Piccadilly and District Lines, as well as the portion of the District Line



between West Brompton and Earl's Court stations, bringing significant relief to each. Providing a new option for those travelling east / west, Crossrail will also assist in further reducing congestion by diverting passengers from the Underground routes in that direction.

4.6 HIGHWAY NETWORK

4.6.1 The Regeneration Area is bounded by the A4 Talgarth Road / West Cromwell Road (to the north), Warwick Road (to the east), North End Road (to the west) and Lillie Road / Old Brompton Road (to the south).

4.6.2 The highway network designations are highlighted on the plan below.

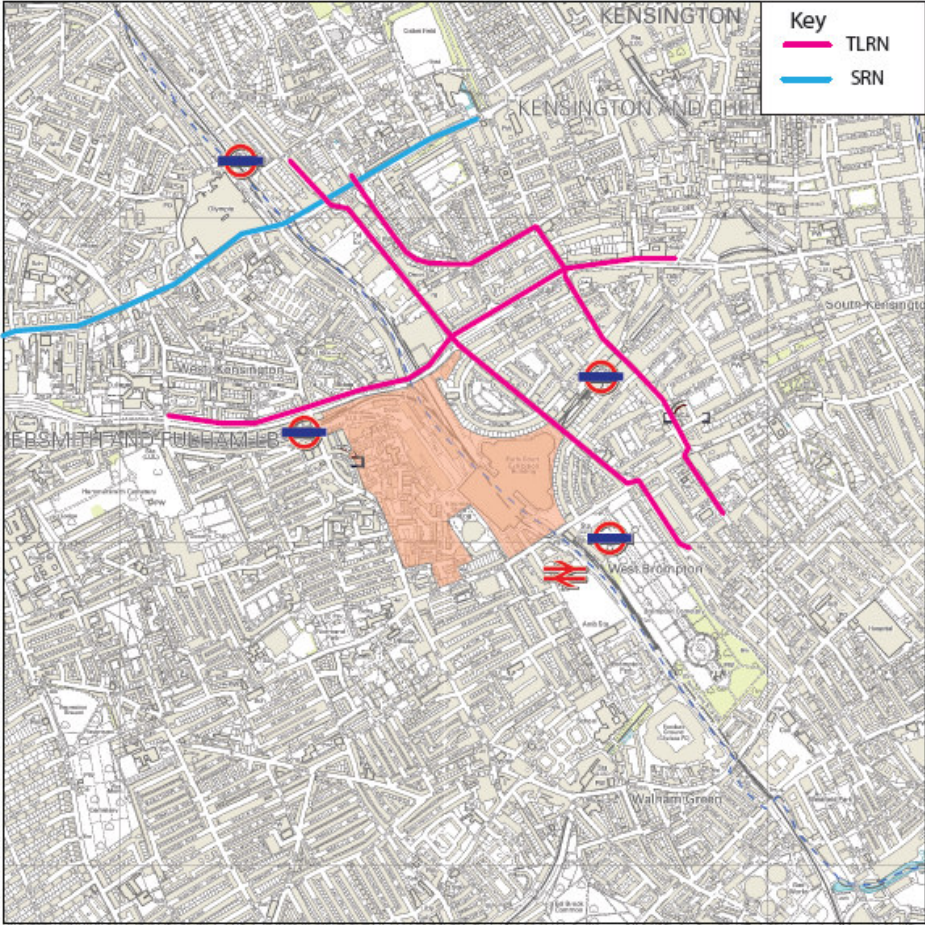


Figure 3.3: Highway Designations

4.6.3 The A4 Talgarth Road / West Cromwell Road and the Warwick Road / Earls Court Road one-way pair all form part of the Transport for London Road Network (TLRN), and the A315 Hammersmith Road / Kensington High Street is part of the Strategic Road Network (SRN).

4.6.4 Weight restrictions are in place on some railway bridges. To the north at Hammersmith Road railway bridge is a 12 tonne restriction. To the south at Fulham Road is a 7.5 tonne restriction. No weight restrictions apply to West Cromwell Road railway bridge. Sections of Lillie Road and the A219 Fulham Palace Road are also subject to a width restriction of 2.1m.

EXISTING TRAFFIC FLOWS



4.6.5 The latest traffic flow information for the AM and PM peaks is presented on the following images, which are based on post-extension survey data gathered by WSP in 2007 and 2008. The traffic surveys were all undertaken during periods when no event was in progress at Earls Court.

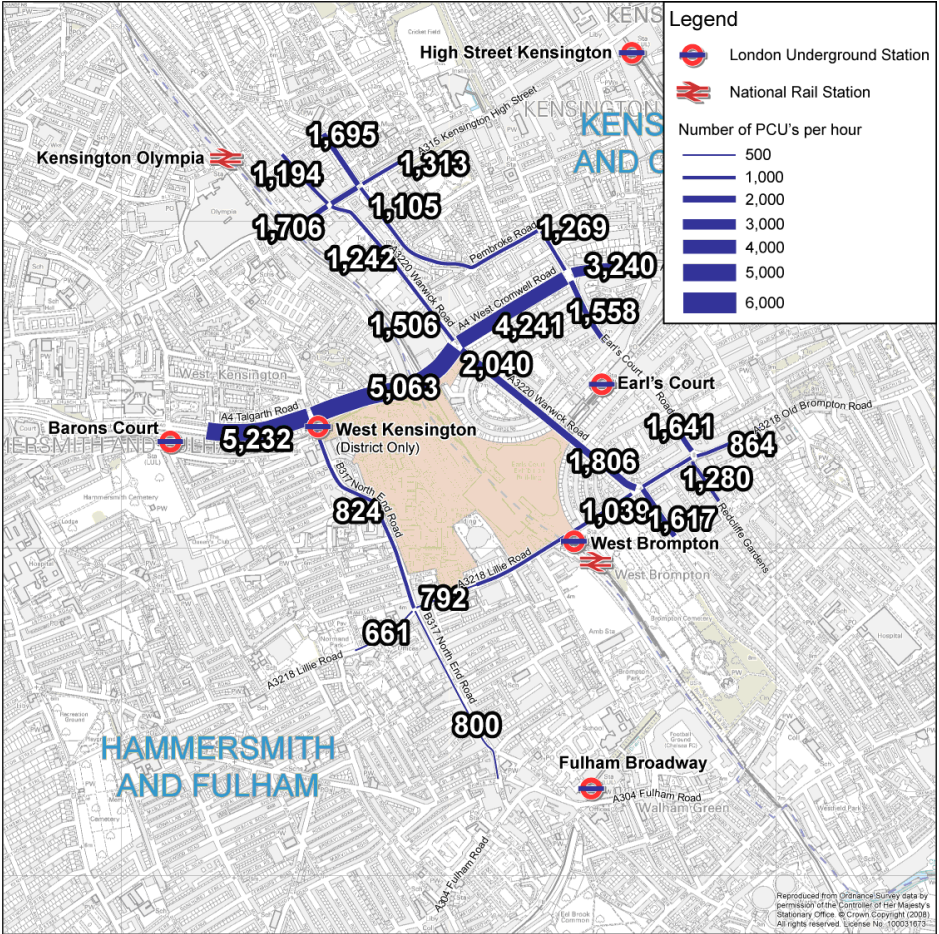


Figure 3.4: AM Peak Hour Traffic Flows (two-way totals)

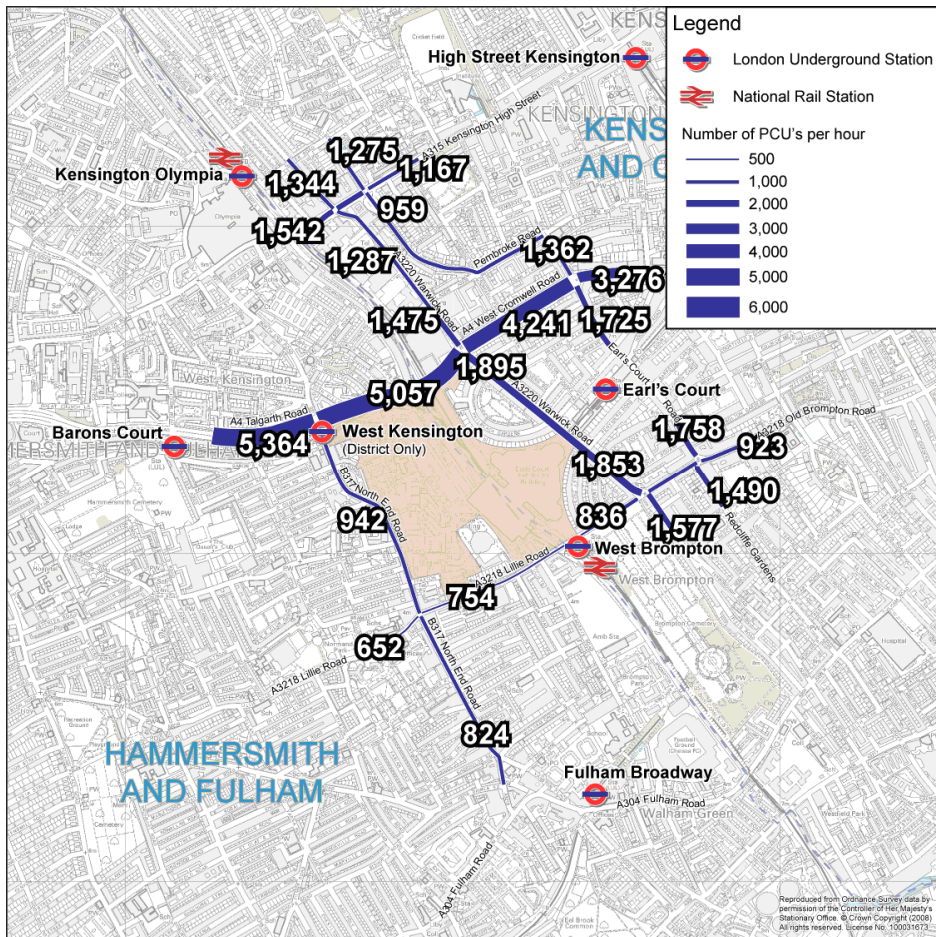


Figure 3.5: PM Peak Hour Traffic Flows (two-way totals)

4.6.6 These Figures show that the dominant movement through the area is east-west through traffic, followed in magnitude by the north-south through traffic. The detail of the individual junction turning movement surveys also shows there is a substantial west-south through movement from the A4, turning right onto Earls Court Road and then continuing south on Redcliffe Gardens. The reverse movement from Finborough Road north to Warwick Road and then turning left onto the A4 westbound is also a dominant movement (half of the Warwick Road traffic approaching the A4 subsequently turns left onto the A4).

EXISTING TRAFFIC GENERATION

4.6.7 The existing traffic movements which are generated by the current uses of the Regeneration Area have been surveyed.

4.6.8 The existing Earls Court exhibition centre traffic movements have been studied in detail with extensive analyses of the exhibition centre servicing and commercial vehicle marshalling procedures. It was found that the existing traffic generation is subject to considerable variation, depending on the events taking place at Earls Court at any one time.

4.6.9 The existing traffic generation therefore varies from a minimum of some 400 vehicles per hour up to around 1000 vehicles per hour. Much of the peak traffic is composed of van and lorry-sized delivery vehicles associated with the build-up and break-down of exhibition events.



EXISTING HIGHWAY CAPACITY

4.6.10 WSP has carried out junction capacity modelling of the key junctions on the local highway network. This initial feasibility exercise has demonstrated areas where there is existing highway capacity, and other areas with scope for improvements. Further junction capacity modelling will be carried out independently by TfL.

4.7 SUMMARY

4.7.1 The Regeneration Area benefits from a high level of public transport accessibility across the majority of the area. The principal shortcoming in the Regeneration Area at the moment is the lack of internal connectivity for all modes of travel for the types and intensity of uses contemplated through redevelopment. The dominance of the road network and presence of railway lines reduce pedestrian connectivity in certain areas. The bus priority network and London Cycle Network is also sparse within the vicinity of the Regeneration Area. The Regeneration Area transport strategy will consider opportunities for addressing these issues in collaboration with relevant local authorities and key stakeholders and is discussed further in Section 5 of this study.



5 Transport Impact

5.1 TRAVEL DEMAND ASSESSMENT

5.1.1 A travel demand forecast has been calculated from the indicative land use budget summarised below.

Table 4.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

5.1.2 Each element of the indicative land use budget has been discussed with the relevant specialist in the Capital & Counties team to ensure that the travel demand assessment is an accurate reflection of the specific forms of development which could come forward in each land use category.

5.1.3 The forecasting exercise has referred to the following information sources and is based on:

- TfL's TRAVL database information;
- trip generation estimates by mode, using data which has been accepted by RBKC, LBHF and TfL recently in respect of other nearby development proposals
- Census Output Area data for nearby locations
- The sustainable transport strategy which is being developed for the Regeneration Area.

5.1.4 Based on these preliminary studies, the total travel demand for the proposed residential, office, hotel and retail uses is likely to be in the region of 20,000 and 19,000 two way person trips in the AM peak and PM peak hours respectively. The modal share for these trips would reflect the accessibility of the area:

- It is predicted that approximately 70% of journeys will be by public transport modes;
- Walking would be the next most significant mode of travel accounting for approximately 16% of journeys (main mode);
- Car driver trips would be minimal accounting for approximately 3% of journeys.

5.1.5 It should be noted that the mix of complementary land uses within the indicative land use budget will reduce the need to travel by providing shopping, and leisure opportunities and social/ community facilities within walking distance of residents living in the area.



5.2 PEDESTRIANS

5.2.1 The land use budget would generate large pedestrian flows, which mostly arise due to people walking between the nearby Earls Court, West Brompton and West Kensington stations and the Regeneration Area.

5.2.2 The key areas to be addressed will be the possible upgrading of station access capacity to cater for these additional pedestrian flows and the provision of high-quality and high-capacity crossing points on pedestrian desire lines which cross busy roads.

5.2.3 The change in pedestrian flows in the wider area beyond the stations will be less significant, but will need to be studied in detail to ensure a satisfactory level of service and upgrading where required.

5.3 CYCLING

5.3.1 The potential demand would result in a large increase above existing cycle flows in the area. This creates a need for high-quality cyclist facilities within the Regeneration Area, including cycle parking, cycle lanes and showering / changing facilities throughout the proposed land uses.

5.3.2 The uplift in cycling demand is such that the off-site cycling network will need to be upgraded in order to provide safe and attractive routes.

5.4 BUSES

5.4.1 Bus demand would also increase significantly, thus generating a need for bus service improvements to add capacity to the network and for on-site and off-site bus priority and other infrastructure to improve the attractiveness of bus travel.

5.4.2 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider – local and metropolitan – transport network and to providing sustainable transport options.

5.4.3 On-site facilities should include modern bus interchanges which link with the tube and train stations to improve the integration of public transport journeys, plus dedicated on-site bus lanes to improve journey times and the reliability of bus journeys relative to car travel. These should be considered alongside bus improvements to the surrounding area.

5.5 RAIL

5.5.1 As discussed in Section 3.5, a number of plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. Collectively these improvements create the significant new rail capacities necessary to ensure the full redevelopment of the Regeneration Area given its central location and proposed future as a sustainable mixed use district and can accommodate, with some modifications, the movement demands anticipated.

5.5.2 Specific improvements over and above those already contemplated under the PPP and Crossrail initiatives may be required in the AM peak inbound to add service to the West London line and to relieve inbound congestion on the District Line from Putney. Halcrow has developed a number of supporting plans and new base timetable that will allow increased demand to be catered for.

5.6 HIGHWAY NETWORK

5.6.1 The potential net impact on the highway network has been forecast within a range, which depends on whether it is compared against an existing event taking place



at Earls Court Exhibition Centre, or whether it is considered against the situation where Earls Court Exhibition Centre is not in use.

5.6.2 For the existing situation where a large event takes place at Earls Court Exhibition Centre, the forecast shows an overall 2% reduction in traffic on the surrounding road network. This is due to the high traffic generation of existing Earls Court Exhibition Centre shows, especially for the build-up and break-down periods where high volumes of large exhibitors' vehicles access the EC 1+ 2 site. The indicative land use budget would generate less traffic than the existing large Earls Court Exhibition Centre events.

5.6.3 When the comparison is based on a scenario where there is no event at Earls Court Exhibition Centre, the outcome is a 2% increase in traffic across the surrounding road network. There is scope for this level of traffic impact to be accommodated, subject to highway capacity improvements, traffic signal re-timing and better traffic management.

5.7 SUMMARY

5.7.1 The indicative land use budget is anticipated to result in approximately 20,000 and 18,700 two way person trips in the AM and PM peak hours respectively. The increased demand resulting from the indicative land use budget could be accommodated through infrastructure improvements across the local transport network.



6 Transport Strategy

6.1 OVERVIEW

6.1.1 The high-level objectives of the Regeneration Area sustainable transport strategy are:

- to mitigate existing transport problems;
- increase accessibility across the area; and
- to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings.

6.1.2 Possible measures to deliver the high level objectives listed above are discussed in detail below. These measures would contribute to both RBKC's and LBHF's aspirations for the development of the Earl's Court area as set out in Section 3.4.

6.1.3 Underpinning the transport strategy is the concept of complementary land uses which have the potential to achieve the PPG13 aims of promoting mixed use development in city, town and district centres, and near to major public transport interchanges in order to achieve vitality and diversity and promote walking as a primary mode of travel.

6.1.4 The proposed transport measures will perform best if they are implemented and managed in an integrated manner, and their effects monitored and reviewed as the development progresses.

6.1.5 The transport strategy will be designed to deliver the long term governance of the transport proposals, maximising their effectiveness in relation to the proposed land uses and the surrounding area, incentivising the achievement of sustainable travel patterns, and delivering the transport outcomes required for the development. The transport strategy will be discussed extensively with TfL, the Boroughs and other stakeholders.

6.2 WALKING & CYCLING

6.2.1 It is recognised that physical aspects of new development will influence travel patterns and can reduce dependence upon the private car. An integral part of promoting sustainable travel will therefore be the design of the development which should prioritise cyclists and pedestrians.

6.2.2 A network of connections could link roads, pedestrian connections and pathways leading to important destinations, such as the Underground stations, major public open spaces and shopping, and connect the area to adjacent neighbourhoods. Extensions to the London Cycling Network should be an integral feature of this network. The design of the overall network should provide a hierarchy of connections, the logic of which can easily be understood by residents as well as visitors. The elements of the network (roads, pathways, etc) should provide sufficient space and a public realm to ensure a comfortable walking or cycling experience. The routes should be well-maintained and legible with lighting, signage and the use of quality materials.

6.2.3 Additional measures that could be considered include:

- Cycle parking in excess of planning standards;



- A bike zone, with public cycle hire and maintenance facilities; and
- Electric charging points for powered cycles, based on renewable energy sources such as solar.

6.2.4 In February 2008, the Mayor announced a new programme aimed at achieving a growth in cycling of 400 percent by 2025. This would mean that five percent of all trips in London were made by bike. The three strands of the programme are:

- Bike hire in central London, providing a new public transport mode for short business and visitor trips;
- Cycling corridors, offering commuters with high profile, clearly signed priority routes from inner to central London; and
- Bike Zones, covering a radius of about 5km around London's town centres, incorporating 20mph speed limits, cycle priority streets, greenways and a network of cycle-friendly routes to link schools, stations, residential areas and workplaces, supported by cycle training, parking and travel planning.

6.2.5 The location and land use patterns in the Regeneration Area have potential to benefit from the proposed cycling corridors and Bike Zones.

6.3 BUSES

6.3.1 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider transport network and to providing sustainable transport options. The following initiatives should be further explored as ways of achieving these objectives:

- Create / improve interchange between buses, rail and underground at West Brompton, Earls Court and West Kensington;
- Create a new on-site bus interchange and extend the surrounding bus routes into the site;
- Create through-routes for buses, with on-site bus priority;
- Propose off-site bus priority and infrastructure improvements;
- Increase the frequency of existing bus services; and
- Propose bus links to key locations and areas which lack a tube or rail connection, such as the Kings Road area and other poorly-served areas of both Boroughs.

6.4 RAIL

6.4.1 Halcrow has undertaken extensive work to consider a number of alternative measures that could be delivered to avoid any potential hotspots on the network and improve capacity on the West London Line (WLL), including the possible introduction of a new base timetable to accommodate the increased demand.

6.4.2 A preferred option would be providing additional services from Clapham Junction to Shepherd's Bush, turning around at North Pole Depot with an extension to Watford to offer a frequent service on the WLL and additional hourly connection with the West Coast Main Line.

6.5 HIGHWAY NETWORK

6.5.1 The proposals will seek to contribute to the aspirations that both RBKC and LBHF has for the area by providing strategic benefits for the highway network through its design. The specific alignments and connectivity of any future road system would be



dependent on the character of the redevelopment; however the following measures would be considered:

- Assessment of any contribution (as required and related to the development) to the tackling the Earls Court One-Way system;
- Provide a north/ south route through the Regeneration Area, which has the capacity to relieve through traffic from both directions of the Earls Court One-Way system. Initial assessments have indicated that the level of relief could be sufficient to achieve :
 - reduced traffic impact
 - improved local air quality
 - reduced community severance
 - improved pedestrian and cyclist conditions
 - improved bus facilities
 - better on-street loading and parking for local businesses;

This concept would need to be assessed in further detail and its implementation would be dependent on extensive consultation and the progress of statutory procedures. The phasing of its delivery relative to other elements of the Regeneration Area would need to be considered carefully

- Improvements to the A4 / North End Road junction to provide an opportunity to improve bus/tube interchange at West Kensington station and increase capacity where possible for north-south traffic and for movements into the area;
- Reduce impact on local roads by providing direct access from the A4;
- Locate accesses at existing points (e.g. the Earls Court, West Brompton and Lillie Road forecourts) and at existing side roads from North End Road which have potential to be connected into the area;
- Provide a separate service road under raised parts of the development. There are potential alignments that could follow the main north / south track corridor; one could run north from Lillie Road at the bridge location to the west of the tracks. Further detailed studies would be undertaken in association with a specific development proposal to determine the alignments and design of these routes;
- Consider the potential for an Urban Consolidation Centre (UCC) to reduce service vehicle movements in the area, with on-site electric-powered vehicles to distribute goods around the Regeneration Area with zero carbon impact.
- Develop Travel Demand Management (TDM) measures in liaison with the project partners and planning authorities, such as:
 - Potentially promoting low-emission Car Clubs on the sites
 - encouraging public transport, walking and cycling
 - adopting parking ratios below the maximum standards, and controlling off-site parking impacts
 - implementing Travel Plans for the residential and commercial uses
 - personalised travel planning;
- Promote a Low Emission Strategy, in line with the Beacon Councils Air Quality Group recommendations (RBKC is a member of this Group); and



-
- Examine the potential for electric car charging stations based on renewable energy sources such as solar.

6.6 SUMMARY

6.6.1 The transport strategy for the Regeneration Area will contain a package of measures to encourage local travel and travel by sustainable modes. The developer will work with local stakeholders and local authorities in preparing and implementing the strategy as a masterplan for the Regeneration Area progresses. Measures that could potentially be included in the strategy have been considered above. However, the specific measures will be dependent on the character of the redevelopment with due consideration to the Borough’s aspirations for the area.

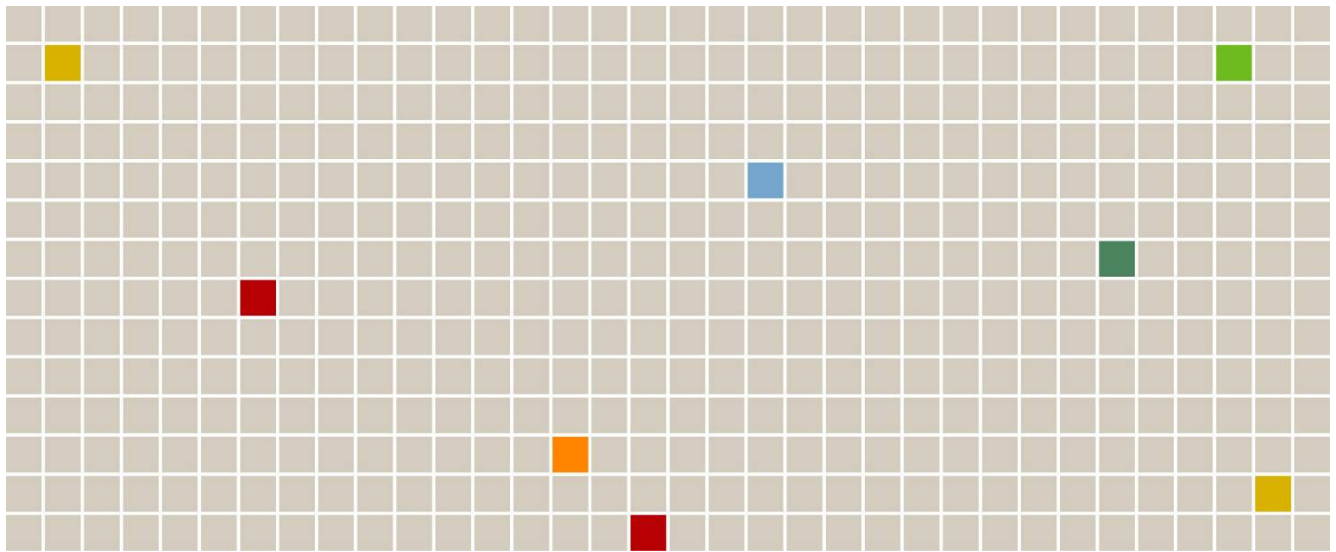


7 Conclusions

7.1.1 This Summary Transport Study is a technical evidence base document which supports the Earls Court Regeneration Area. The study has considered the transport implications of an indicative land use budget for the Regeneration Area.

7.1.2 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

7.1.3 The provision of additional transport infrastructure to support the Regeneration Area would be complemented by a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and minimise car dependency, in line with national, regional and local policy aims. These measures have the potential to improve a number of existing transport issues in RBKC and LBHF and will be developed as a Masterplan for the Regeneration Area evolves.



Earls Court Regeneration Area Core Strategy Evidence Base Summary Transport Study

Capital & Counties on behalf of Earls Court and
Olympia Group

June 2009





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1 Executive Summary

1.1.1 This technical report provides evidence in support of the Earls Court Regeneration Area in relation to transport matters.

1.1.2 The Earls Court Regeneration Area covers 27 hectares and comprising:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

1.1.3 The indicative land use budgets assessed in this report are based on 1,380,000 to 1,640,000 sq m of development comprising a comprehensive mix of complimentary land uses to provide a sustainable community for the area.

1.1.4 The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study would therefore be subject to further review as any development proposals progress.

1.1.5 Most of the Regeneration Area benefits from a high level of public transport accessibility and there is scope to improve this further. Regeneration of this area is in line with planning policies that seek to locate major new developments in proximity to transport infrastructure. The transport implications of the indicative land use budget have been assessed and are reflected in the transport strategy considered in this study.

1.1.6 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

1.1.7 The transport strategy will include a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and reduce car dependency, in line with national, regional and local policy aims. The proposals support the Borough’s aspirations for the area and will provide strategic benefits to the transport network by helping to tackle a number of existing issues which have been identified in the draft Core Strategy.

1.1.8 The transport strategy aims to mitigate existing transport problems, increase accessibility across the Regeneration Area and to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings. Subject to the outcome of the core strategy consultation, it is the intention to develop the transport strategy in close liaison with RBKC, LBHF, TfL and other stakeholders as the Core Strategy and the masterplanning process move forward.

1.1.9 Based on the indicative land use budget, the development proposals are anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. The increased demand resulting could be accommodated through infrastructure improvements across the local transport network.

1.1.10 The indicative land use budget would generate less traffic than existing large Earls Court Exhibition Centre events

2 Introduction

2.1 SCOPE OF STUDY

2.1.1 WSP and Halcrow have been appointed to advise Capital and Counties on behalf of the Earls Court and Olympia Group on the transport aspects of a potential redevelopment of the Earls Court Regeneration Area. This study forms part of the evidence base for the Regeneration Areas. The Regeneration Area comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.2 The summary study considers the transport implications of a potential development scenario on the transport infrastructure in the vicinity of the Earls Court Regeneration Area, which covers 27 hectares and comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.3 For the purpose of the technical analyses in this study, an indicative land use budget of 1,380,000 to 1,640,000 sq m has been assumed for the Regeneration Area. The breakdown of this overall total is provided in Table 1.1. The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study will therefore be subject to further review as masterplanning and any development proposals progress

Table 1.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

2.2 REPORT STRUCTURE

2.2.1 This study provides an initial technical briefing, which will in due course inform any future masterplanning process. It sets out the potential transport issues, constraints and opportunities for the Regeneration Area drawing on work undertaken to date and the findings of preliminary studies of the existing situation. It also provides suggestions for the development of a sustainable transport strategy to build on the significant potential of the area to deliver a highly sustainable development. The remainder of the study is set out as follows:



-
- Section 1 is an Executive Summary
 - Section 2 is an Introduction to the context of the summary study
 - Section 3 provides an overview of relevant transport policy in relation to the site;
 - Section 4 reviews the existing transport infrastructure in the vicinity of the site;
 - Section 5 considers the potential transport impacts based on the indicative land use budgets;
 - Section 6 discusses the potential Regeneration Area transport strategy; and
 - Section 7 concludes and summarises the findings of this study.



3 Policy Overview

3.1 NATIONAL

3.1.1 The Government's over-arching strategy is set out in Planning Policy Guidance Note 13 (PPG13), which emphasises the key themes of sustainable development. The document reinforces the message that there must be greater integration of planning and transport in order to promote more sustainable transport choices and reduce the need to travel, especially by private car.

3.1.2 The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices and to promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling. It therefore advocates:

- actively managing the pattern of urban growth to make the fullest use of public transport;
- increased intensity of development at locations which are highly accessible by public transport, walking and cycling;
- reducing the amount of parking in new developments, as part of a package of planning and transport measures to promote sustainable travel choices;
- promoting mixed use development, which can provide very significant benefits in terms of vitality and diversity and in promoting walking as a primary mode of travel;
- producing a broad balance at the strategic level between employment and housing, to minimise the need for long distance commuting;
- focussing mixed use development involving large amounts of employment, shopping, leisure and services in city, town and district centres, and near to major public transport interchanges (see paragraph 20); and
- encouraging a mix of land uses, including housing, in town, suburban and local centres.

3.2 REGIONAL

THE LONDON PLAN (CONSOLIDATED WITH ALTERATIONS SINCE 2004)

3.2.1 The Plan sets out policies to help London manage significant growth in London's population and jobs. In terms of transport and development, the key themes are:

- encouraging proposals for large residential developments in areas of high public transport accessibility, including the provision of suitable non-residential uses within such schemes;
- encouraging patterns and forms of development that reduce the need to travel especially by car;
- seeking to improve public transport capacity and accessibility where it is needed;
- supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity; and



- ensuring that on-site car parking at new developments is the minimum necessary, with no over-provision that could undermine the use of more sustainable non-car modes.

A NEW PLAN FOR LONDON (APRIL 2009)

3.2.2 In July 2008 a consultation document 'Planning for a Better London' was published outlining the approach that was proposed to the revision of the London Plan. The next stage of this review is the publication of 'A New Plan for London'. It is intended that the new London Plan would be completed in around four years, with various supplementary planning documents being issued in the meantime.

3.2.3 Pages 61 to 65 of A New Plan for London discuss policy considerations related to London's Transport networks. It states the following objective;

- *A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan.*

3.2.4 Reference is also made to a co-ordinated approach to land use and transport planning stating:

- *Close co-ordination of the provision of transport infrastructure and services with land use development is essential to support London's continued development and growth. Good public transport access will not in itself guarantee development but it is a necessary condition for a successful city – one in which everyone has easy, safe and convenient access to jobs, opportunities and facilities.*

3.2.5 There is also an emphasis on delivering reduced congestion within London's streets and providing environments suitable for all users It states:

- *London's streets perform a variety of functions – they should provide a safe and pleasant means of travelling on foot, by cycle, bus or car; and act as a network of attractive public spaces in which people can interact. The new Plan will emphasise facilitating essential access for people, goods and services, and give strong support for cycling, walking and taking the bus – in town centres, other parts of Outer London and across central London.*

3.2.6 Page 64 states that in reviewing the London Plan the Mayor proposes to:

- *Develop a new, criteria based, approach to road schemes which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve;*
- *Tackle congestion and traffic reduction, including investigating road user charging in the future;*
- *Allocate street space in line with MTS priorities, including shared space, where appropriate, (taking account of the safety of all pedestrians, particularly visually impaired people); improve conditions for buses; and investigate coach hubs;*
- *Substantially strengthen policy on walking and support the "Legible London" initiative;*
- *Put in place strong policies supporting cycling, with reference to the Velib cycle rental scheme and cycling superhighways;*
- *Develop new cycle parking standards; and*
- *Strengthen policy on public realm enhancements.*



THE MAYOR'S TRANSPORT STRATEGY 2001

3.2.7 This document supports the Mayor's vision of London as an exemplary sustainable world city. The Transport Strategy aims to increase the capacity, reliability, efficiency, quality and integration of London's transport system to provide the world class transport system the capital needs. The ten key transport priorities which flow from this are:

- reducing traffic congestion;
- overcoming the backlog of investment in the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services;
- making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing the frequency of services;
- better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London wide, high frequency 'turn up and go' Metro service;
- increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving access to international transport facilities; improved orbital rail links in inner London; and new Thames river crossings in east London;
- improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice;
- supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better maintenance of roads and bridges, and improved co-ordination of streetworks;
- making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts;
- improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion; and
- bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environment.

MAYOR'S TRANSPORT STRATEGY – STATEMENT OF INTENT (MAY 2009)

3.2.8 A new transport strategy is currently under consultation with the London Assembly and GLA Group, prior to a full draft which will be subject to public consultation in Autumn 2009. Publication of the final new strategy is scheduled for early 2010.



3.2.9 The draft principles are largely in line with the current Transport Strategy, but with more emphasis on the transport needs and viability of Greater London as a whole rather than focusing on Central London. Key themes include: ensuring a lasting transport legacy at the Olympic and Paralympics Games venues including Earls Court; improving transport opportunities with significant investment in public transport, walking, cycling; and tackling climate change through measures, such as, ensuring at least 20 percent of parking spaces in new developments have charging points for electric vehicles.

3.2.10 The existing proposals largely relate to the projects and proposals already committed to in TfL's nine-year Business Plan. In addition, they also include those improvements to the National Rail network to be delivered by Network Rail and the Government up to 2014, as part of the current High Level Output Specification Control Period 4 funding package, and by other major agencies (e.g. BAA and the Highways Agency) delivering transport improvements impacting on London.

3.2.11 The document also confirms the Mayor's intention to remove the Western Extension Zone (WEZ) of the Congestion Charging zone, following a non-statutory consultation with the public and stakeholders. In the future, wider road user charging may be explored in the context of a national scheme and charging in town centres may also be considered. Other measures, such as, upgrading signal control junctions, improving the management of roadworks and road enhancements will be used to mitigate the effects of the removal of the WEZ.

LONDON FREIGHT PLAN (OCTOBER 2007)

3.2.12 The London Freight Plan sets out the steps that should be taken over the next five to ten years to identify and begin to address the challenge of delivering freight sustainably in London.

3.2.13 The Plan has no statutory force, but has been developed to implement the Mayor's Transport Strategy, and is a material consideration for planning. The same principles underpin the Mayor's Transport Strategy.

3.2.14 The specific policy aims are to:

- Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing in order to support London's economy;
- Minimise the adverse environmental impact of freight transport and servicing in London;
- Minimise the impact of congestion on the carriage of goods and provision of servicing and;
- Foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practicable.

3.3 LOCAL

RBKC ADOPTED POLICY

3.3.1 The 2002 Unitary Development Plan (UDP) recognises that many of the transport-related issues affecting RBKC need to be viewed and resolved in a London-wide context, as well as reflecting residents' interests. It also acknowledges that solutions to many transport challenges require a coordinated, strategic approach by government and its agencies, transport authorities and transport providers and operators.



3.3.2 It proposes an effective transport system that is integrated with land-use planning and is based on patterns of land-use which reduce the need to travel and promote the use of public transport, walking and cycling as alternatives to the private car.

3.3.3 RBKC has formulated eight principal strategic policies within the former UDP. In the revised UDP, the number of principal strategic policies has reduced to three and those relating to transport issues are:

- STRAT 5: To ensure that further visitor related development locates in places that are well served by public transport and does not harm the residential character or amenity of the Borough.
- STRAT 7: To promote sustainable development through locating high trip generating uses in areas which are or will be well served by public transport and by encouraging the local provision of services and facilities to reduce the need to travel.

3.3.4 RBKC has adopted the following objectives for transport in the Borough:

- locate high trip-generating activity in areas well served by public transport;
- improve access to all land uses, especially for those with special mobility needs through the efficient use of the transport network;
- reduce the need to travel and, in particular, the number and length of motor vehicle trips by ensuring that development is located appropriately;
- promote measures to reduce the need to travel;
- reduce overall levels of road traffic in the Borough;
- reduce air pollution from road traffic and the noise nuisance caused by transport;
- increase the proportion of journeys made on foot and by bicycle;
- improve public transport so it is more convenient and reliable to use, is better able to meet demand and is attractive as an alternative to the private car;
- reduce the number and severity of road accident casualties;
- minimise the adverse effects of traffic in the Borough, particularly on the environment of residential areas and shopping centres;
- ensure that development does not add to on-street parking stress, in particular where demand is already saturated; and
- ensure that changes to the transport infrastructure improve the Borough's townscape.


3.3.5 These objectives are reflected in strategic transport policies STRAT 25, STRAT 26, STRAT 29 and STRAT 35.

3.3.6 Policy TR28 states that RBKC will:

“resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough's Road Network.

Consideration may be given to limited additional highway provision where there will be no overall opportunity to increase the volume of traffic passing through the Borough. Actual proposals are likely to be limited but where proposals are advanced, complementary traffic management schemes will be designed to limit the possibility of adding to traffic volumes.

The Council, however, has supported, for a long time, road proposals that could provide some relief to the Earls Court one-way system. This support should also extend to



signage changes to re-route long distance traffic from these roads, which are linked with the Council's desire to see the Earl's Court One-Way System and the Embankment removed from London's Strategic Road Network. The Council supports means of improving the access to Earls Court Exhibition Centre, in order to reduce the number of commercial vehicles and coaches from the residential areas around Earls Court. The Council has supported an access road for lorries running north of the Centre, alongside the West London Line and beneath the West Cromwell Road, linking with Warwick Road."

RBKC DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.7 Section 5 of the "Places" draft Core Strategy document highlights a number of existing transport issues in the Earl's Court area:

- *"...the quality of the town centre [on Earl's Court Road] is shattered by the one-way south bound traffic, which forms part of the Earl's Court One-Way System (para 5.1.2);*
- *The One-Way System travels north up Warwick Road, and degrades the residential environment of that street (para 5.1.2);*
- *Cromwell Road also acts as a significant barrier to pedestrians (para 5.1.2);*
- *...using buses can be confusing because of the One-Way System (para 5.1.4);*
- *The One-Way System also makes for a poor pedestrian environment (para 5.1.4);*
- *There is at present no easy way to get from the Exhibition Centre to the Town Centre (para 5.1.6); and*
- *Air quality is a concern in the area due to pollution from traffic(para 5.8.1)"*

3.3.8 The document also sets out the aspirations and vision that RBKC has for the future development of the Earl's Court area. The key aspirations relating to transport are:

- *" unravelling the One-Way System (para 5.1.8);*
- *...reducing the traffic flow (para 5.1.8);*
- *...offering an attractive "urban-village" environment (para 5.1.8);*
- *...new good direct connection to the Exhibition Centre (para 5.1.8);*
- *Streetscape and pedestrian improvements to Cromwell Road...making it more pleasant for pedestrians and residents and marking the arrival of the A4 in Central London (para 5.1.8);*
- *Pedestrian movement across West Cromwell Road will be improved, particularly at the junction with Warwick Road (para 5.2.1);*
- *A new north-south link to the west of the railway line (para 5.2.1);*
- *...an improved public transport interchange between West Brompton station and Earl's Court station (para 5.2.2);*
- *... reduction and rationalisation of street clutter (para 5.7.1); and*
- *...support the reinstatement of two-way working and significant enhancements to the streetscape (para 5.7.2).*

LBHF ADOPTED POLICY

- UDP Policy G4 sets out the LBHF transport objectives as:



- development will be guided to locations that minimise the need to travel, and will be required to incorporate access arrangements that encourage the use of sustainable modes of travel and transport;
- the intensity of development will be related to accessibility by public transport, with new development expected to promote traffic restraint and reduction, so as to reduce congestion and air pollution and to avoid the need for increased road capacity;
- land use provision for improvements to the road network will only be made where necessary in the interests of traffic safety or maintaining the free flow of essential traffic;
- the siting, design and layout of development will be required to provide:
 - easy access by disabled people
 - safe, secure and direct access by pedestrians
 - facilities to encourage travel to and from the development by cycling and other sustainable modes of travel and transport.
- measures will also be sought, in connection with development proposals, to:
 - secure necessary improvements to, and development of, public transport systems and services, including additional stations on the West London Line;
 - ensure that road safety is not compromised and that the free flow of essential traffic is maintained;
 - minimise vehicle parking demand both by controlling the amount of on-street parking provision and by securing the introduction of complementary parking controls and traffic management measures to control off-site parking;
 - to promote the use of rail and water for freight transport;
 - protect residential areas and main shopping streets from the environmental impact of traffic generated by development proposals.

3.3.9 Policy TN8 defines a hierarchy of roads in LBHF and explains that developments will not be permitted if they hamper the ability of these roads to provide safe and effective access.

3.3.10 Policy TN13 notes that all developments will be assessed for their contribution to traffic generation and their impact on congestion.

3.3.11 Policy TN28 on freight movements, seeks to:

'Encourage and support the confinement of heavy lorries to suitable routes and their exclusion from unsuitable roads, other than for final access to premises.'

3.3.12 The justification to this policy recognises the importance of freight for the local economy, and the potential conflict with the quality of the local environment. The management of freight routes is seen as one way that this can be achieved.

LBHF DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.13 The Core Strategy Options document for the London Borough of Hammersmith and Fulham (LBFH) was put out to consultation on the 5th June 2009. This document makes reference to the following in the context of the Earl's Court area.

3.3.14 In Section 4, Issues Opportunities and Constraints:



- *...Earls Court...are major opportunity areas because they not only have substantial development potential but because they have very high existing public transport accessibility (para 4.104);*

3.3.15 In section 5, Spatial Vision:

- *... We will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment. Where we do not control the roads, for example the busy A4 and A40, we will have worked with our partners, particularly Transport for London to achieve these aims. We will also have worked with partners to improve transport in the borough, particularly north south links, as well as the opportunities for cycling and walking. Where there is major development we will have improved access, particularly for pedestrians and cyclists (para 5.17);*

3.3.16 In section 7, Key Spatial Options for Delivering the Council's Vision it is stated that:

- *The Council has a key objective to create decent neighbourhoods, regenerate town centres and the most deprived parts of the borough, particularly White City, West Kensington/Earls Court/North Fulham and Hammersmith and to reduce polarisation and worklessness to create more stable, mixed and balanced communities where people can live, work and prosper (para 7.3)*
- *We think the West London Line is capable of running services to a much higher level to help unlock regeneration potential(para 7.8)*

3.3.17 Within Section 8, consideration is given to the appropriate development type in the Earls Court Regeneration Area. Within this section it is stated that:

- *The area is highly accessible to public transport, being close to West Brompton Station which is on the District and West London Lines and to Earls Court Station, on the District and Piccadilly Lines. Although there is little spare capacity on these lines at peak times, some improvements will take place with the future plans of Transport for London. The highway network in the area is congested through the town centre (past the street market) and south of the A4. (para 8.95)*
- *Employment creation to more than replace the potential loss of the exhibition centre (para 8.111)*



4 Baseline Conditions

4.1 WALKING AND CYCLING

4.1.1 Transport policies at all levels encourage walking and cycling as being the most sustainable and low-impact modes of travel. PPG13 highlights the potential for walking to replace short car trips, especially for journeys under 2km. It also notes that cycling has the potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

WALKING

4.1.2 According to the Mayor of London's website, almost seven million walking journeys on foot are made in London every day and walking accounts for 80 percent of all trips under one mile. Walking is a cost effective, accessible, healthy and enjoyable form of travel, and is a compulsory element of any journey.

4.1.3 The Walking Plan for London – '*Making London a walkable city*' was published by the Mayor in February 2004 to promote walking. The Plan adopts the 'the 5 'Cs' from the London Planning Advisory Committee (LPAC) Walking Strategy for London as key indicators of walkability which are; Connected, Convivial, Conspicuous, Comfortable and Convenient.

4.1.4 The principal shortcomings in the Regeneration Area are the poor pedestrian environment along the A4 and the relative impermeability of the pedestrian network across the West London Line and through the privately-owned Earls Court and Olympia sites.

4.1.5 As there is no direct through route from the LBHF Site to the town centre, residents currently need to use the A4 West Cromwell Road to access Earls Court Road. For example, from Gibbs Green Close (part of the LBHF site) to the junction of Earls Court Road/Nevers Place; the crow fly distance is approximately 815m equivalent to a 10 minute walk whilst the distance walking along the accessible streets would be approximately 1.3 kilometres equivalent to a 16 minute walk

4.1.6 Warwick Road is a predominately residential street with the exception of the Exhibition Centre with good, well maintained and lit footways. Informal crossing points including tactile paving to facilitate north-south movement. There are signalised pedestrian crossings at its junction with the A4 West Cromwell Road and Old Brompton Road and between the tube station and Exhibition Centre. There is, however, a lack of crossing points at intermediate locations along the street which would facilitate crossing movements between the footways along either side.

4.1.7 The A4 is a significant barrier to pedestrian movement; a complicated multi-stage pedestrian crossing is provided at the A4 West Cromwell Road/Warwick Road junction to negotiate the multiple lanes of traffic on a very wide carriageway.

4.2 CYCLING

4.2.1 The London Cycle Network (LCN) is a network of signed routes for cyclists across the capital. Over 550km of the 900km network has been completed to date; final completion is due by the end of 2010. TfL are also investing in an off-road network of routes through London's parks, and along the capital's waterways.

4.2.2 There are some established LCN cycle routes of varying significance in the immediate vicinity. An existing signposted radial route runs along the southern edge of



the site (Lille Road) and a 'recommended' route lies off the north western edge of the area which connects across West Cromwell Road, towards Olympia. The LCN around the Regeneration Area is shown on the following plan.



Figure 3.1: London Cycle Network

4.2.3 However, the Regeneration Area is a notable gap in the existing cycle network in West London. The North End Road, Cromwell Road and the rail corridor present significant barriers to radial and orbital cycle journeys in the vicinity of the area, whilst the Exhibition Buildings and surrounding estate are impermeable to cycle movements across the zone. Consequently, there are no current proposals to improve the cycle network within the Regeneration Area.

4.3 PUBLIC TRANSPORT ACCESSIBILITY

4.3.1 Transport policies place an emphasis on the integration of land use, transport and planning decisions. In particular, the policies stress the need to create more sustainable patterns of development by delivering accessibility.

4.3.2 The accessibility of sites to public transport, particularly those located in London has, since the mid 1990s, been defined by reference to a Public Transport Accessibility Level (PTAL). This methodology identifies an index as a measure of accessibility. This index is expressed as a grade from 1 to 6 where 1 is the lowest and 6 the highest level of accessibility.

4.3.3 The area benefits from high accessibility (up to PTAL 6) with the exception of a PTAL 3 area in the centre of the Regeneration Area. This reduced accessibility arises



due to the lack of permeability across the area and the lack of public transport services currently entering the site due to existing infrastructure.

4.4 BUSES

4.4.1 The existing bus network is shown on Figure 3.2.

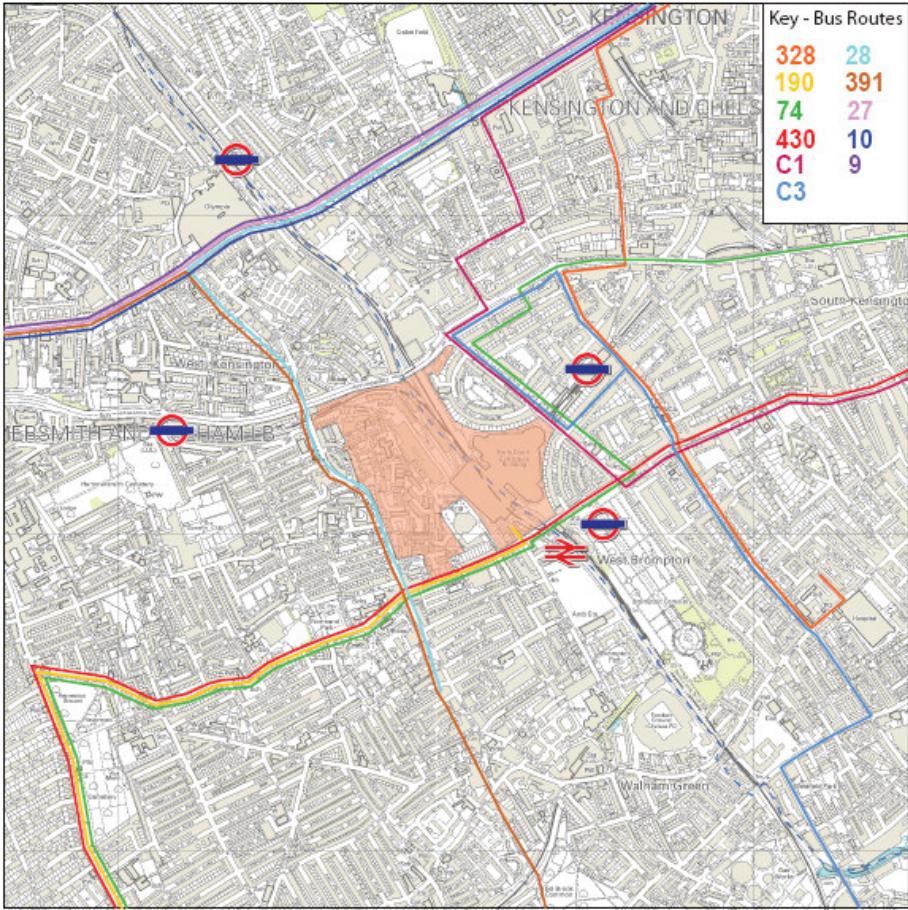


Figure 3.2: Bus Network

4.4.2 The Inner West London bus network was enhanced in late-2006 / early-2007 in order to complement the Western Extension Zone of the London congestion charge scheme. These improvements added a passenger capacity of more than 4,800 in the peak hour, demonstrating the relative ease with which the bus network can be enhanced in a short time scale

4.4.3 However, some bus improvement proposals were frustrated by a lack of bus priority measures and bus standing areas. In addition, the bus priority network around the Regeneration Area is under-developed, with only limited sections of bus lane on North End Road. The lack of bus priority means that services are vulnerable to delays caused by traffic congestion.

4.4.4 A further limitation of the Inner West London bus network is the lack of available land for bus interchanges and operational bus stands. The flexibility of the bus network entails that bus routes have often been established and extended on a “piecemeal” basis, with the result that the network can be fragmented.

4.4.5 For example, around the Regeneration Area there are bus stands:

- between the Empress State Building and Earls Court 2 for the 190 route only;



- at the Warwick Road / West Cromwell Road Tesco for the C3 only;
- at World's End, Chelsea for the 328 only;
- at Notting Hill Gate for the 390 only; and
- near Craven Cottage for the 424 only.

4.4.6 The standard of bus / rail / Underground is also generally poor at the surrounding West Brompton, Earls Court, West Kensington and Kensington Olympia stations.

4.5 RAIL

4.5.1 Rail connections around the Regeneration Area are extensive and provide important links at all geographic scales (local, metropolitan, regional and national) to accommodate increased patronage and are likely to be a main mode of travel for residents, workers and visitors alike.

4.5.2 Understanding the railway services and the connections they offer is key to understanding the way people will access the site in the future. In order to do this Halcrow undertook service analysis at the following stations:

- West Brompton,
- Earls Court,
- West Kensington,
- Kensington Olympia

4.5.3 The following is a list of projects which are likely to feature and have an effect on this project:

- West Coast Main Line timetable change – December 2008/9
- LOROL Service Level 2 timetable (4 trains per hour between Clapham and Willesden/Stratford)
- Interchange with Central Line at White City
- Capacity Improvements on the Piccadilly and District lines
- Southern RUS comments on Gatwick - Watford service and any changes likely to be implemented during the life of the Southern franchise
- LOROL orbital service (2011 for East London Line and later for links to South London)
- Shepherds Bush interchange
- Cross London RUS

4.5.4 On Network Rail, the main constraint to capacity is likely to be the frequency of services on lines that adjoin the West London Line. At the north end of the West London Line (WLL) there are junctions with the North London Line, the Great Western main line (via the South West Sidings route) and the West Coast Main Line (WCML) all of which are heavily used by freight and passenger services. To the south there are two routes to Clapham Junction, a disused route to Waterloo, a route to Victoria via the Battersea reversible line and to the South Eastern network via Factory Junction.

4.5.5 Plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. PPP upgrades due by 2017 are planned for the eastbound Piccadilly and District Lines, as well as the portion of the District Line



between West Brompton and Earl's Court stations, bringing significant relief to each. Providing a new option for those travelling east / west, Crossrail will also assist in further reducing congestion by diverting passengers from the Underground routes in that direction.

4.6 HIGHWAY NETWORK

4.6.1 The Regeneration Area is bounded by the A4 Talgarth Road / West Cromwell Road (to the north), Warwick Road (to the east), North End Road (to the west) and Lillie Road / Old Brompton Road (to the south).

4.6.2 The highway network designations are highlighted on the plan below.

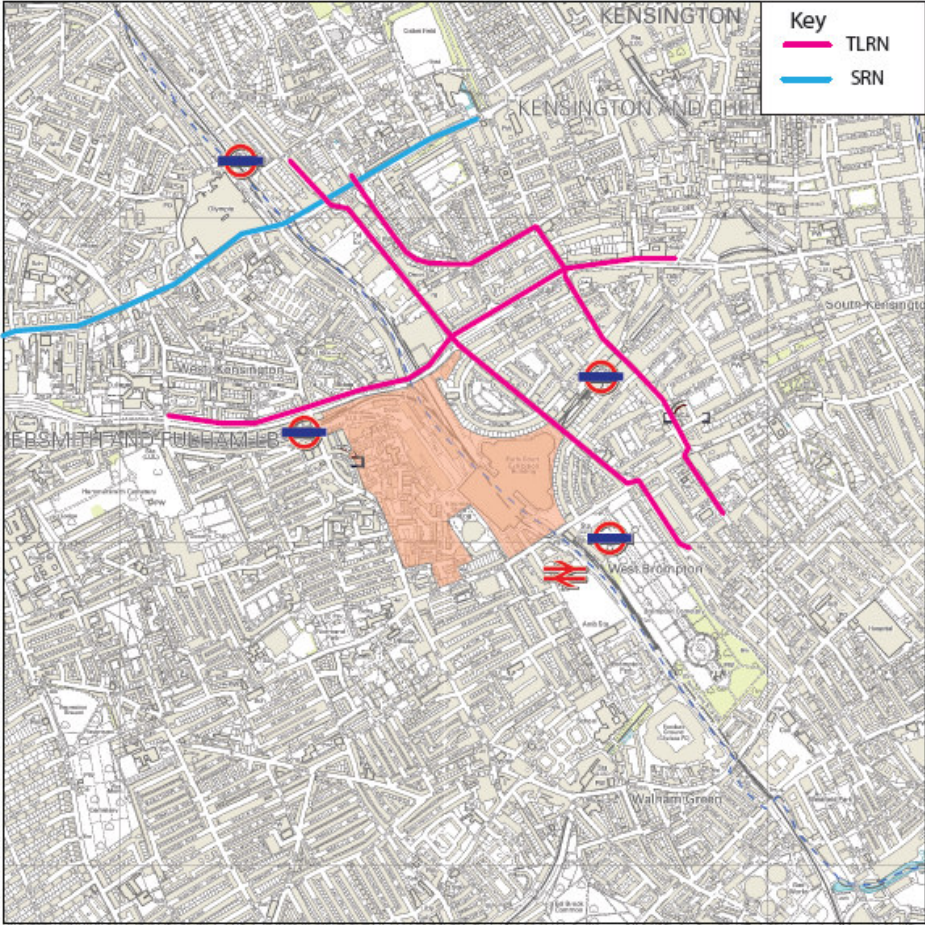


Figure 3.3: Highway Designations

4.6.3 The A4 Talgarth Road / West Cromwell Road and the Warwick Road / Earls Court Road one-way pair all form part of the Transport for London Road Network (TLRN), and the A315 Hammersmith Road / Kensington High Street is part of the Strategic Road Network (SRN).

4.6.4 Weight restrictions are in place on some railway bridges. To the north at Hammersmith Road railway bridge is a 12 tonne restriction. To the south at Fulham Road is a 7.5 tonne restriction. No weight restrictions apply to West Cromwell Road railway bridge. Sections of Lillie Road and the A219 Fulham Palace Road are also subject to a width restriction of 2.1m.

EXISTING TRAFFIC FLOWS



4.6.5 The latest traffic flow information for the AM and PM peaks is presented on the following images, which are based on post-extension survey data gathered by WSP in 2007 and 2008. The traffic surveys were all undertaken during periods when no event was in progress at Earls Court.

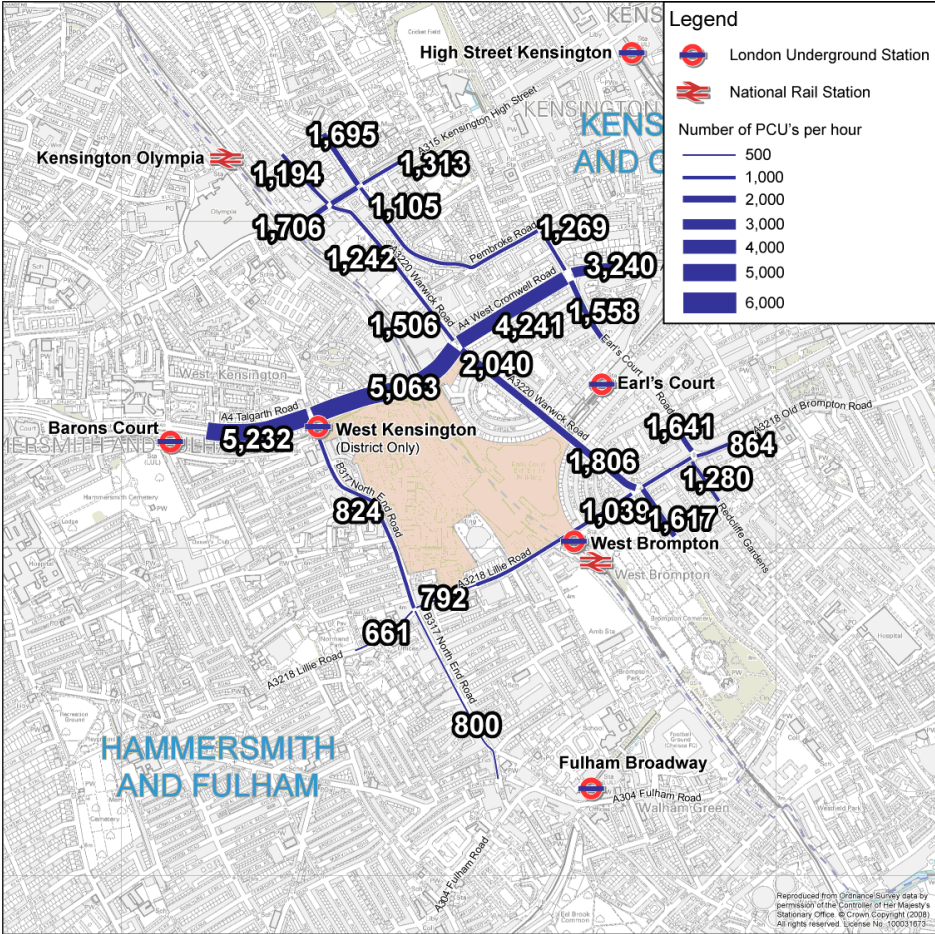


Figure 3.4: AM Peak Hour Traffic Flows (two-way totals)

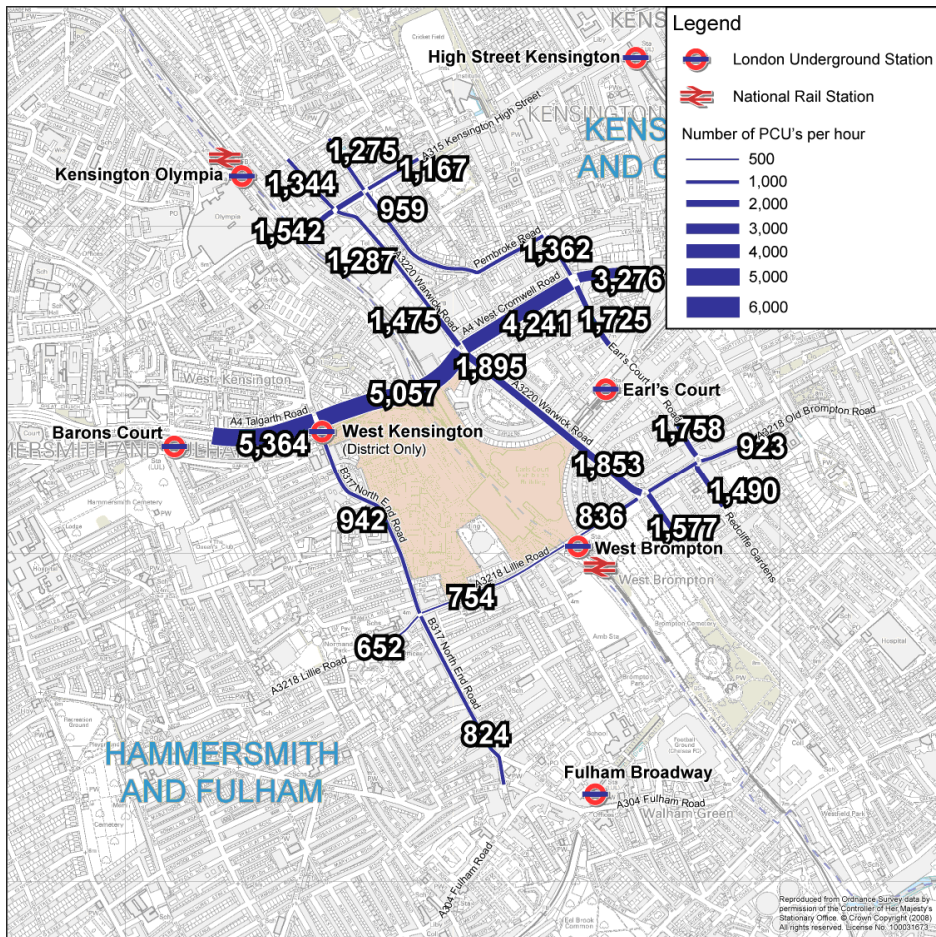


Figure 3.5: PM Peak Hour Traffic Flows (two-way totals)

4.6.6 These Figures show that the dominant movement through the area is east-west through traffic, followed in magnitude by the north-south through traffic. The detail of the individual junction turning movement surveys also shows there is a substantial west-south through movement from the A4, turning right onto Earls Court Road and then continuing south on Redcliffe Gardens. The reverse movement from Finborough Road north to Warwick Road and then turning left onto the A4 westbound is also a dominant movement (half of the Warwick Road traffic approaching the A4 subsequently turns left onto the A4).

EXISTING TRAFFIC GENERATION

4.6.7 The existing traffic movements which are generated by the current uses of the Regeneration Area have been surveyed.

4.6.8 The existing Earls Court exhibition centre traffic movements have been studied in detail with extensive analyses of the exhibition centre servicing and commercial vehicle marshalling procedures. It was found that the existing traffic generation is subject to considerable variation, depending on the events taking place at Earls Court at any one time.

4.6.9 The existing traffic generation therefore varies from a minimum of some 400 vehicles per hour up to around 1000 vehicles per hour. Much of the peak traffic is composed of van and lorry-sized delivery vehicles associated with the build-up and break-down of exhibition events.



EXISTING HIGHWAY CAPACITY

4.6.10 WSP has carried out junction capacity modelling of the key junctions on the local highway network. This initial feasibility exercise has demonstrated areas where there is existing highway capacity, and other areas with scope for improvements. Further junction capacity modelling will be carried out independently by TfL.

4.7 SUMMARY

4.7.1 The Regeneration Area benefits from a high level of public transport accessibility across the majority of the area. The principal shortcoming in the Regeneration Area at the moment is the lack of internal connectivity for all modes of travel for the types and intensity of uses contemplated through redevelopment. The dominance of the road network and presence of railway lines reduce pedestrian connectivity in certain areas. The bus priority network and London Cycle Network is also sparse within the vicinity of the Regeneration Area. The Regeneration Area transport strategy will consider opportunities for addressing these issues in collaboration with relevant local authorities and key stakeholders and is discussed further in Section 5 of this study.



5 Transport Impact

5.1 TRAVEL DEMAND ASSESSMENT

5.1.1 A travel demand forecast has been calculated from the indicative land use budget summarised below.

Table 4.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

5.1.2 Each element of the indicative land use budget has been discussed with the relevant specialist in the Capital & Counties team to ensure that the travel demand assessment is an accurate reflection of the specific forms of development which could come forward in each land use category.

5.1.3 The forecasting exercise has referred to the following information sources and is based on:

- TfL's TRAVL database information;
- trip generation estimates by mode, using data which has been accepted by RBKC, LBHF and TfL recently in respect of other nearby development proposals
- Census Output Area data for nearby locations
- The sustainable transport strategy which is being developed for the Regeneration Area.

5.1.4 Based on these preliminary studies, the total travel demand for the proposed residential, office, hotel and retail uses is likely to be in the region of 20,000 and 19,000 two way person trips in the AM peak and PM peak hours respectively. The modal share for these trips would reflect the accessibility of the area:

- It is predicted that approximately 70% of journeys will be by public transport modes;
- Walking would be the next most significant mode of travel accounting for approximately 16% of journeys (main mode);
- Car driver trips would be minimal accounting for approximately 3% of journeys.

5.1.5 It should be noted that the mix of complementary land uses within the indicative land use budget will reduce the need to travel by providing shopping, and leisure opportunities and social/ community facilities within walking distance of residents living in the area.



5.2 PEDESTRIANS

5.2.1 The land use budget would generate large pedestrian flows, which mostly arise due to people walking between the nearby Earls Court, West Brompton and West Kensington stations and the Regeneration Area.

5.2.2 The key areas to be addressed will be the possible upgrading of station access capacity to cater for these additional pedestrian flows and the provision of high-quality and high-capacity crossing points on pedestrian desire lines which cross busy roads.

5.2.3 The change in pedestrian flows in the wider area beyond the stations will be less significant, but will need to be studied in detail to ensure a satisfactory level of service and upgrading where required.

5.3 CYCLING

5.3.1 The potential demand would result in a large increase above existing cycle flows in the area. This creates a need for high-quality cyclist facilities within the Regeneration Area, including cycle parking, cycle lanes and showering / changing facilities throughout the proposed land uses.

5.3.2 The uplift in cycling demand is such that the off-site cycling network will need to be upgraded in order to provide safe and attractive routes.

5.4 BUSES

5.4.1 Bus demand would also increase significantly, thus generating a need for bus service improvements to add capacity to the network and for on-site and off-site bus priority and other infrastructure to improve the attractiveness of bus travel.

5.4.2 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider – local and metropolitan – transport network and to providing sustainable transport options.

5.4.3 On-site facilities should include modern bus interchanges which link with the tube and train stations to improve the integration of public transport journeys, plus dedicated on-site bus lanes to improve journey times and the reliability of bus journeys relative to car travel. These should be considered alongside bus improvements to the surrounding area.

5.5 RAIL

5.5.1 As discussed in Section 3.5, a number of plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. Collectively these improvements create the significant new rail capacities necessary to ensure the full redevelopment of the Regeneration Area given its central location and proposed future as a sustainable mixed use district and can accommodate, with some modifications, the movement demands anticipated.

5.5.2 Specific improvements over and above those already contemplated under the PPP and Crossrail initiatives may be required in the AM peak inbound to add service to the West London line and to relieve inbound congestion on the District Line from Putney. Halcrow has developed a number of supporting plans and new base timetable that will allow increased demand to be catered for.

5.6 HIGHWAY NETWORK

5.6.1 The potential net impact on the highway network has been forecast within a range, which depends on whether it is compared against an existing event taking place



at Earls Court Exhibition Centre, or whether it is considered against the situation where Earls Court Exhibition Centre is not in use.

5.6.2 For the existing situation where a large event takes place at Earls Court Exhibition Centre, the forecast shows an overall 2% reduction in traffic on the surrounding road network. This is due to the high traffic generation of existing Earls Court Exhibition Centre shows, especially for the build-up and break-down periods where high volumes of large exhibitors' vehicles access the EC 1+ 2 site. The indicative land use budget would generate less traffic than the existing large Earls Court Exhibition Centre events.

5.6.3 When the comparison is based on a scenario where there is no event at Earls Court Exhibition Centre, the outcome is a 2% increase in traffic across the surrounding road network. There is scope for this level of traffic impact to be accommodated, subject to highway capacity improvements, traffic signal re-timing and better traffic management.

5.7 SUMMARY

5.7.1 The indicative land use budget is anticipated to result in approximately 20,000 and 18,700 two way person trips in the AM and PM peak hours respectively. The increased demand resulting from the indicative land use budget could be accommodated through infrastructure improvements across the local transport network.



6 Transport Strategy

6.1 OVERVIEW

6.1.1 The high-level objectives of the Regeneration Area sustainable transport strategy are:

- to mitigate existing transport problems;
- increase accessibility across the area; and
- to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings.

6.1.2 Possible measures to deliver the high level objectives listed above are discussed in detail below. These measures would contribute to both RBKC's and LBHF's aspirations for the development of the Earl's Court area as set out in Section 3.4.

6.1.3 Underpinning the transport strategy is the concept of complementary land uses which have the potential to achieve the PPG13 aims of promoting mixed use development in city, town and district centres, and near to major public transport interchanges in order to achieve vitality and diversity and promote walking as a primary mode of travel.

6.1.4 The proposed transport measures will perform best if they are implemented and managed in an integrated manner, and their effects monitored and reviewed as the development progresses.

6.1.5 The transport strategy will be designed to deliver the long term governance of the transport proposals, maximising their effectiveness in relation to the proposed land uses and the surrounding area, incentivising the achievement of sustainable travel patterns, and delivering the transport outcomes required for the development. The transport strategy will be discussed extensively with TfL, the Boroughs and other stakeholders.

6.2 WALKING & CYCLING

6.2.1 It is recognised that physical aspects of new development will influence travel patterns and can reduce dependence upon the private car. An integral part of promoting sustainable travel will therefore be the design of the development which should prioritise cyclists and pedestrians.

6.2.2 A network of connections could link roads, pedestrian connections and pathways leading to important destinations, such as the Underground stations, major public open spaces and shopping, and connect the area to adjacent neighbourhoods. Extensions to the London Cycling Network should be an integral feature of this network. The design of the overall network should provide a hierarchy of connections, the logic of which can easily be understood by residents as well as visitors. The elements of the network (roads, pathways, etc) should provide sufficient space and a public realm to ensure a comfortable walking or cycling experience. The routes should be well-maintained and legible with lighting, signage and the use of quality materials.

6.2.3 Additional measures that could be considered include:

- Cycle parking in excess of planning standards;



- A bike zone, with public cycle hire and maintenance facilities; and
- Electric charging points for powered cycles, based on renewable energy sources such as solar.

6.2.4 In February 2008, the Mayor announced a new programme aimed at achieving a growth in cycling of 400 percent by 2025. This would mean that five percent of all trips in London were made by bike. The three strands of the programme are:

- Bike hire in central London, providing a new public transport mode for short business and visitor trips;
- Cycling corridors, offering commuters with high profile, clearly signed priority routes from inner to central London; and
- Bike Zones, covering a radius of about 5km around London's town centres, incorporating 20mph speed limits, cycle priority streets, greenways and a network of cycle-friendly routes to link schools, stations, residential areas and workplaces, supported by cycle training, parking and travel planning.

6.2.5 The location and land use patterns in the Regeneration Area have potential to benefit from the proposed cycling corridors and Bike Zones.

6.3 BUSES

6.3.1 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider transport network and to providing sustainable transport options. The following initiatives should be further explored as ways of achieving these objectives:

- Create / improve interchange between buses, rail and underground at West Brompton, Earls Court and West Kensington;
- Create a new on-site bus interchange and extend the surrounding bus routes into the site;
- Create through-routes for buses, with on-site bus priority;
- Propose off-site bus priority and infrastructure improvements;
- Increase the frequency of existing bus services; and
- Propose bus links to key locations and areas which lack a tube or rail connection, such as the Kings Road area and other poorly-served areas of both Boroughs.

6.4 RAIL

6.4.1 Halcrow has undertaken extensive work to consider a number of alternative measures that could be delivered to avoid any potential hotspots on the network and improve capacity on the West London Line (WLL), including the possible introduction of a new base timetable to accommodate the increased demand.

6.4.2 A preferred option would be providing additional services from Clapham Junction to Shepherd's Bush, turning around at North Pole Depot with an extension to Watford to offer a frequent service on the WLL and additional hourly connection with the West Coast Main Line.

6.5 HIGHWAY NETWORK

6.5.1 The proposals will seek to contribute to the aspirations that both RBKC and LBHF has for the area by providing strategic benefits for the highway network through its design. The specific alignments and connectivity of any future road system would be



dependent on the character of the redevelopment; however the following measures would be considered:

- Assessment of any contribution (as required and related to the development) to the tackling the Earls Court One-Way system;
- Provide a north/ south route through the Regeneration Area, which has the capacity to relieve through traffic from both directions of the Earls Court One-Way system. Initial assessments have indicated that the level of relief could be sufficient to achieve :
 - reduced traffic impact
 - improved local air quality
 - reduced community severance
 - improved pedestrian and cyclist conditions
 - improved bus facilities
 - better on-street loading and parking for local businesses;

This concept would need to be assessed in further detail and its implementation would be dependent on extensive consultation and the progress of statutory procedures. The phasing of its delivery relative to other elements of the Regeneration Area would need to be considered carefully

- Improvements to the A4 / North End Road junction to provide an opportunity to improve bus/tube interchange at West Kensington station and increase capacity where possible for north-south traffic and for movements into the area;
- Reduce impact on local roads by providing direct access from the A4;
- Locate accesses at existing points (e.g. the Earls Court, West Brompton and Lillie Road forecourts) and at existing side roads from North End Road which have potential to be connected into the area;
- Provide a separate service road under raised parts of the development. There are potential alignments that could follow the main north / south track corridor; one could run north from Lillie Road at the bridge location to the west of the tracks. Further detailed studies would be undertaken in association with a specific development proposal to determine the alignments and design of these routes;
- Consider the potential for an Urban Consolidation Centre (UCC) to reduce service vehicle movements in the area, with on-site electric-powered vehicles to distribute goods around the Regeneration Area with zero carbon impact.
- Develop Travel Demand Management (TDM) measures in liaison with the project partners and planning authorities, such as:
 - Potentially promoting low-emission Car Clubs on the sites
 - encouraging public transport, walking and cycling
 - adopting parking ratios below the maximum standards, and controlling off-site parking impacts
 - implementing Travel Plans for the residential and commercial uses
 - personalised travel planning;
- Promote a Low Emission Strategy, in line with the Beacon Councils Air Quality Group recommendations (RBKC is a member of this Group); and



-
- Examine the potential for electric car charging stations based on renewable energy sources such as solar.

6.6 SUMMARY

6.6.1 The transport strategy for the Regeneration Area will contain a package of measures to encourage local travel and travel by sustainable modes. The developer will work with local stakeholders and local authorities in preparing and implementing the strategy as a masterplan for the Regeneration Area progresses. Measures that could potentially be included in the strategy have been considered above. However, the specific measures will be dependent on the character of the redevelopment with due consideration to the Borough’s aspirations for the area.

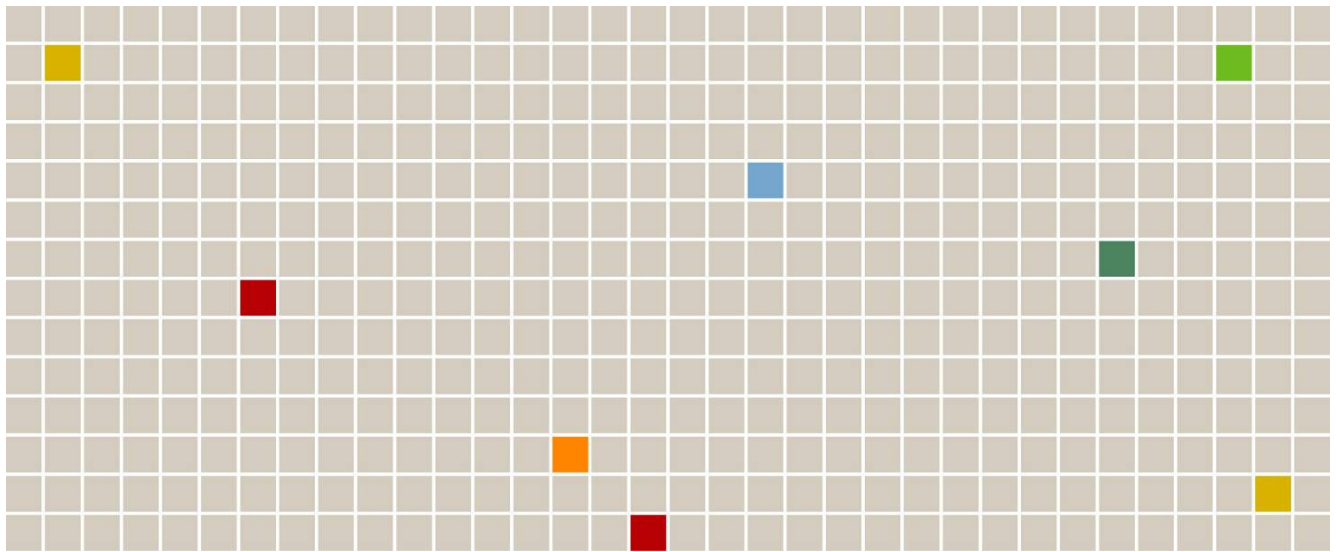


7 Conclusions

7.1.1 This Summary Transport Study is a technical evidence base document which supports the Earls Court Regeneration Area. The study has considered the transport implications of an indicative land use budget for the Regeneration Area.

7.1.2 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

7.1.3 The provision of additional transport infrastructure to support the Regeneration Area would be complemented by a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and minimise car dependency, in line with national, regional and local policy aims. These measures have the potential to improve a number of existing transport issues in RBKC and LBHF and will be developed as a Masterplan for the Regeneration Area evolves.



Earls Court Regeneration Area Core Strategy Evidence Base Summary Transport Study

Capital & Counties on behalf of Earls Court and
Olympia Group

June 2009





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1 Executive Summary

1.1.1 This technical report provides evidence in support of the Earls Court Regeneration Area in relation to transport matters.

1.1.2 The Earls Court Regeneration Area covers 27 hectares and comprising:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

1.1.3 The indicative land use budgets assessed in this report are based on 1,380,000 to 1,640,000 sq m of development comprising a comprehensive mix of complimentary land uses to provide a sustainable community for the area.

1.1.4 The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study would therefore be subject to further review as any development proposals progress.

1.1.5 Most of the Regeneration Area benefits from a high level of public transport accessibility and there is scope to improve this further. Regeneration of this area is in line with planning policies that seek to locate major new developments in proximity to transport infrastructure. The transport implications of the indicative land use budget have been assessed and are reflected in the transport strategy considered in this study.

1.1.6 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

1.1.7 The transport strategy will include a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and reduce car dependency, in line with national, regional and local policy aims. The proposals support the Borough’s aspirations for the area and will provide strategic benefits to the transport network by helping to tackle a number of existing issues which have been identified in the draft Core Strategy.

1.1.8 The transport strategy aims to mitigate existing transport problems, increase accessibility across the Regeneration Area and to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings. Subject to the outcome of the core strategy consultation, it is the intention to develop the transport strategy in close liaison with RBKC, LBHF, TfL and other stakeholders as the Core Strategy and the masterplanning process move forward.

1.1.9 Based on the indicative land use budget, the development proposals are anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. The increased demand resulting could be accommodated through infrastructure improvements across the local transport network.

1.1.10 The indicative land use budget would generate less traffic than existing large Earls Court Exhibition Centre events

2 Introduction

2.1 SCOPE OF STUDY

2.1.1 WSP and Halcrow have been appointed to advise Capital and Counties on behalf of the Earls Court and Olympia Group on the transport aspects of a potential redevelopment of the Earls Court Regeneration Area. This study forms part of the evidence base for the Regeneration Areas. The Regeneration Area comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.2 The summary study considers the transport implications of a potential development scenario on the transport infrastructure in the vicinity of the Earls Court Regeneration Area, which covers 27 hectares and comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.3 For the purpose of the technical analyses in this study, an indicative land use budget of 1,380,000 to 1,640,000 sq m has been assumed for the Regeneration Area. The breakdown of this overall total is provided in Table 1.1. The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study will therefore be subject to further review as masterplanning and any development proposals progress

Table 1.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

2.2 REPORT STRUCTURE

2.2.1 This study provides an initial technical briefing, which will in due course inform any future masterplanning process. It sets out the potential transport issues, constraints and opportunities for the Regeneration Area drawing on work undertaken to date and the findings of preliminary studies of the existing situation. It also provides suggestions for the development of a sustainable transport strategy to build on the significant potential of the area to deliver a highly sustainable development. The remainder of the study is set out as follows:



-
- Section 1 is an Executive Summary
 - Section 2 is an Introduction to the context of the summary study
 - Section 3 provides an overview of relevant transport policy in relation to the site;
 - Section 4 reviews the existing transport infrastructure in the vicinity of the site;
 - Section 5 considers the potential transport impacts based on the indicative land use budgets;
 - Section 6 discusses the potential Regeneration Area transport strategy; and
 - Section 7 concludes and summarises the findings of this study.



3 Policy Overview

3.1 NATIONAL

3.1.1 The Government's over-arching strategy is set out in Planning Policy Guidance Note 13 (PPG13), which emphasises the key themes of sustainable development. The document reinforces the message that there must be greater integration of planning and transport in order to promote more sustainable transport choices and reduce the need to travel, especially by private car.

3.1.2 The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices and to promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling. It therefore advocates:

- actively managing the pattern of urban growth to make the fullest use of public transport;
- increased intensity of development at locations which are highly accessible by public transport, walking and cycling;
- reducing the amount of parking in new developments, as part of a package of planning and transport measures to promote sustainable travel choices;
- promoting mixed use development, which can provide very significant benefits in terms of vitality and diversity and in promoting walking as a primary mode of travel;
- producing a broad balance at the strategic level between employment and housing, to minimise the need for long distance commuting;
- focussing mixed use development involving large amounts of employment, shopping, leisure and services in city, town and district centres, and near to major public transport interchanges (see paragraph 20); and
- encouraging a mix of land uses, including housing, in town, suburban and local centres.

3.2 REGIONAL

THE LONDON PLAN (CONSOLIDATED WITH ALTERATIONS SINCE 2004)

3.2.1 The Plan sets out policies to help London manage significant growth in London's population and jobs. In terms of transport and development, the key themes are:

- encouraging proposals for large residential developments in areas of high public transport accessibility, including the provision of suitable non-residential uses within such schemes;
- encouraging patterns and forms of development that reduce the need to travel especially by car;
- seeking to improve public transport capacity and accessibility where it is needed;
- supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity; and



- ensuring that on-site car parking at new developments is the minimum necessary, with no over-provision that could undermine the use of more sustainable non-car modes.

A NEW PLAN FOR LONDON (APRIL 2009)

3.2.2 In July 2008 a consultation document 'Planning for a Better London' was published outlining the approach that was proposed to the revision of the London Plan. The next stage of this review is the publication of 'A New Plan for London'. It is intended that the new London Plan would be completed in around four years, with various supplementary planning documents being issued in the meantime.

3.2.3 Pages 61 to 65 of A New Plan for London discuss policy considerations related to London's Transport networks. It states the following objective;

- *A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan.*

3.2.4 Reference is also made to a co-ordinated approach to land use and transport planning stating:

- *Close co-ordination of the provision of transport infrastructure and services with land use development is essential to support London's continued development and growth. Good public transport access will not in itself guarantee development but it is a necessary condition for a successful city – one in which everyone has easy, safe and convenient access to jobs, opportunities and facilities.*

3.2.5 There is also an emphasis on delivering reduced congestion within London's streets and providing environments suitable for all users It states:

- *London's streets perform a variety of functions – they should provide a safe and pleasant means of travelling on foot, by cycle, bus or car; and act as a network of attractive public spaces in which people can interact. The new Plan will emphasise facilitating essential access for people, goods and services, and give strong support for cycling, walking and taking the bus – in town centres, other parts of Outer London and across central London.*

3.2.6 Page 64 states that in reviewing the London Plan the Mayor proposes to:

- *Develop a new, criteria based, approach to road schemes which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve;*
- *Tackle congestion and traffic reduction, including investigating road user charging in the future;*
- *Allocate street space in line with MTS priorities, including shared space, where appropriate, (taking account of the safety of all pedestrians, particularly visually impaired people); improve conditions for buses; and investigate coach hubs;*
- *Substantially strengthen policy on walking and support the "Legible London" initiative;*
- *Put in place strong policies supporting cycling, with reference to the Velib cycle rental scheme and cycling superhighways;*
- *Develop new cycle parking standards; and*
- *Strengthen policy on public realm enhancements.*



THE MAYOR'S TRANSPORT STRATEGY 2001

3.2.7 This document supports the Mayor's vision of London as an exemplary sustainable world city. The Transport Strategy aims to increase the capacity, reliability, efficiency, quality and integration of London's transport system to provide the world class transport system the capital needs. The ten key transport priorities which flow from this are:

- reducing traffic congestion;
- overcoming the backlog of investment in the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services;
- making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing the frequency of services;
- better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London wide, high frequency 'turn up and go' Metro service;
- increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving access to international transport facilities; improved orbital rail links in inner London; and new Thames river crossings in east London;
- improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice;
- supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better maintenance of roads and bridges, and improved co-ordination of streetworks;
- making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts;
- improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion; and
- bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environment.

MAYOR'S TRANSPORT STRATEGY – STATEMENT OF INTENT (MAY 2009)

3.2.8 A new transport strategy is currently under consultation with the London Assembly and GLA Group, prior to a full draft which will be subject to public consultation in Autumn 2009. Publication of the final new strategy is scheduled for early 2010.



3.2.9 The draft principles are largely in line with the current Transport Strategy, but with more emphasis on the transport needs and viability of Greater London as a whole rather than focusing on Central London. Key themes include: ensuring a lasting transport legacy at the Olympic and Paralympics Games venues including Earls Court; improving transport opportunities with significant investment in public transport, walking, cycling; and tackling climate change through measures, such as, ensuring at least 20 percent of parking spaces in new developments have charging points for electric vehicles.

3.2.10 The existing proposals largely relate to the projects and proposals already committed to in TfL's nine-year Business Plan. In addition, they also include those improvements to the National Rail network to be delivered by Network Rail and the Government up to 2014, as part of the current High Level Output Specification Control Period 4 funding package, and by other major agencies (e.g. BAA and the Highways Agency) delivering transport improvements impacting on London.

3.2.11 The document also confirms the Mayor's intention to remove the Western Extension Zone (WEZ) of the Congestion Charging zone, following a non-statutory consultation with the public and stakeholders. In the future, wider road user charging may be explored in the context of a national scheme and charging in town centres may also be considered. Other measures, such as, upgrading signal control junctions, improving the management of roadworks and road enhancements will be used to mitigate the effects of the removal of the WEZ.

LONDON FREIGHT PLAN (OCTOBER 2007)

3.2.12 The London Freight Plan sets out the steps that should be taken over the next five to ten years to identify and begin to address the challenge of delivering freight sustainably in London.

3.2.13 The Plan has no statutory force, but has been developed to implement the Mayor's Transport Strategy, and is a material consideration for planning. The same principles underpin the Mayor's Transport Strategy.

3.2.14 The specific policy aims are to:

- Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing in order to support London's economy;
- Minimise the adverse environmental impact of freight transport and servicing in London;
- Minimise the impact of congestion on the carriage of goods and provision of servicing and;
- Foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practicable.

3.3 LOCAL

RBKC ADOPTED POLICY

3.3.1 The 2002 Unitary Development Plan (UDP) recognises that many of the transport-related issues affecting RBKC need to be viewed and resolved in a London-wide context, as well as reflecting residents' interests. It also acknowledges that solutions to many transport challenges require a coordinated, strategic approach by government and its agencies, transport authorities and transport providers and operators.



3.3.2 It proposes an effective transport system that is integrated with land-use planning and is based on patterns of land-use which reduce the need to travel and promote the use of public transport, walking and cycling as alternatives to the private car.

3.3.3 RBKC has formulated eight principal strategic policies within the former UDP. In the revised UDP, the number of principal strategic policies has reduced to three and those relating to transport issues are:

- STRAT 5: To ensure that further visitor related development locates in places that are well served by public transport and does not harm the residential character or amenity of the Borough.
- STRAT 7: To promote sustainable development through locating high trip generating uses in areas which are or will be well served by public transport and by encouraging the local provision of services and facilities to reduce the need to travel.

3.3.4 RBKC has adopted the following objectives for transport in the Borough:

- locate high trip-generating activity in areas well served by public transport;
- improve access to all land uses, especially for those with special mobility needs through the efficient use of the transport network;
- reduce the need to travel and, in particular, the number and length of motor vehicle trips by ensuring that development is located appropriately;
- promote measures to reduce the need to travel;
- reduce overall levels of road traffic in the Borough;
- reduce air pollution from road traffic and the noise nuisance caused by transport;
- increase the proportion of journeys made on foot and by bicycle;
- improve public transport so it is more convenient and reliable to use, is better able to meet demand and is attractive as an alternative to the private car;
- reduce the number and severity of road accident casualties;
- minimise the adverse effects of traffic in the Borough, particularly on the environment of residential areas and shopping centres;
- ensure that development does not add to on-street parking stress, in particular where demand is already saturated; and
- ensure that changes to the transport infrastructure improve the Borough's townscape.


3.3.5 These objectives are reflected in strategic transport policies STRAT 25, STRAT 26, STRAT 29 and STRAT 35.

3.3.6 Policy TR28 states that RBKC will:

“resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough's Road Network.

Consideration may be given to limited additional highway provision where there will be no overall opportunity to increase the volume of traffic passing through the Borough. Actual proposals are likely to be limited but where proposals are advanced, complementary traffic management schemes will be designed to limit the possibility of adding to traffic volumes.

The Council, however, has supported, for a long time, road proposals that could provide some relief to the Earls Court one-way system. This support should also extend to



signage changes to re-route long distance traffic from these roads, which are linked with the Council's desire to see the Earl's Court One-Way System and the Embankment removed from London's Strategic Road Network. The Council supports means of improving the access to Earls Court Exhibition Centre, in order to reduce the number of commercial vehicles and coaches from the residential areas around Earls Court. The Council has supported an access road for lorries running north of the Centre, alongside the West London Line and beneath the West Cromwell Road, linking with Warwick Road."

RBKC DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.7 Section 5 of the "Places" draft Core Strategy document highlights a number of existing transport issues in the Earl's Court area:

- *"...the quality of the town centre [on Earl's Court Road] is shattered by the one-way south bound traffic, which forms part of the Earl's Court One-Way System (para 5.1.2);*
- *The One-Way System travels north up Warwick Road, and degrades the residential environment of that street (para 5.1.2);*
- *Cromwell Road also acts as a significant barrier to pedestrians (para 5.1.2);*
- *...using buses can be confusing because of the One-Way System (para 5.1.4);*
- *The One-Way System also makes for a poor pedestrian environment (para 5.1.4);*
- *There is at present no easy way to get from the Exhibition Centre to the Town Centre (para 5.1.6); and*
- *Air quality is a concern in the area due to pollution from traffic(para 5.8.1)"*

3.3.8 The document also sets out the aspirations and vision that RBKC has for the future development of the Earl's Court area. The key aspirations relating to transport are:

- *" unravelling the One-Way System (para 5.1.8);*
- *...reducing the traffic flow (para 5.1.8);*
- *...offering an attractive "urban-village" environment (para 5.1.8);*
- *...new good direct connection to the Exhibition Centre (para 5.1.8);*
- *Streetscape and pedestrian improvements to Cromwell Road...making it more pleasant for pedestrians and residents and marking the arrival of the A4 in Central London (para 5.1.8);*
- *Pedestrian movement across West Cromwell Road will be improved, particularly at the junction with Warwick Road (para 5.2.1);*
- *A new north-south link to the west of the railway line (para 5.2.1);*
- *...an improved public transport interchange between West Brompton station and Earl's Court station (para 5.2.2);*
- *... reduction and rationalisation of street clutter (para 5.7.1); and*
- *...support the reinstatement of two-way working and significant enhancements to the streetscape (para 5.7.2).*

LBHF ADOPTED POLICY

- UDP Policy G4 sets out the LBHF transport objectives as:



- development will be guided to locations that minimise the need to travel, and will be required to incorporate access arrangements that encourage the use of sustainable modes of travel and transport;
- the intensity of development will be related to accessibility by public transport, with new development expected to promote traffic restraint and reduction, so as to reduce congestion and air pollution and to avoid the need for increased road capacity;
- land use provision for improvements to the road network will only be made where necessary in the interests of traffic safety or maintaining the free flow of essential traffic;
- the siting, design and layout of development will be required to provide:
 - easy access by disabled people
 - safe, secure and direct access by pedestrians
 - facilities to encourage travel to and from the development by cycling and other sustainable modes of travel and transport.
- measures will also be sought, in connection with development proposals, to:
 - secure necessary improvements to, and development of, public transport systems and services, including additional stations on the West London Line;
 - ensure that road safety is not compromised and that the free flow of essential traffic is maintained;
 - minimise vehicle parking demand both by controlling the amount of on-street parking provision and by securing the introduction of complementary parking controls and traffic management measures to control off-site parking;
 - to promote the use of rail and water for freight transport;
 - protect residential areas and main shopping streets from the environmental impact of traffic generated by development proposals.

3.3.9 Policy TN8 defines a hierarchy of roads in LBHF and explains that developments will not be permitted if they hamper the ability of these roads to provide safe and effective access.

3.3.10 Policy TN13 notes that all developments will be assessed for their contribution to traffic generation and their impact on congestion.

3.3.11 Policy TN28 on freight movements, seeks to:

'Encourage and support the confinement of heavy lorries to suitable routes and their exclusion from unsuitable roads, other than for final access to premises.'

3.3.12 The justification to this policy recognises the importance of freight for the local economy, and the potential conflict with the quality of the local environment. The management of freight routes is seen as one way that this can be achieved.

LBHF DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.13 The Core Strategy Options document for the London Borough of Hammersmith and Fulham (LBHF) was put out to consultation on the 5th June 2009. This document makes reference to the following in the context of the Earl's Court area.

3.3.14 In Section 4, Issues Opportunities and Constraints:



- *...Earls Court...are major opportunity areas because they not only have substantial development potential but because they have very high existing public transport accessibility (para 4.104);*

3.3.15 In section 5, Spatial Vision:

- *... We will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment. Where we do not control the roads, for example the busy A4 and A40, we will have worked with our partners, particularly Transport for London to achieve these aims. We will also have worked with partners to improve transport in the borough, particularly north south links, as well as the opportunities for cycling and walking. Where there is major development we will have improved access, particularly for pedestrians and cyclists (para 5.17);*

3.3.16 In section 7, Key Spatial Options for Delivering the Council's Vision it is stated that:

- *The Council has a key objective to create decent neighbourhoods, regenerate town centres and the most deprived parts of the borough, particularly White City, West Kensington/Earls Court/North Fulham and Hammersmith and to reduce polarisation and worklessness to create more stable, mixed and balanced communities where people can live, work and prosper (para 7.3)*
- *We think the West London Line is capable of running services to a much higher level to help unlock regeneration potential(para 7.8)*

3.3.17 Within Section 8, consideration is given to the appropriate development type in the Earls Court Regeneration Area. Within this section it is stated that:

- *The area is highly accessible to public transport, being close to West Brompton Station which is on the District and West London Lines and to Earls Court Station, on the District and Piccadilly Lines. Although there is little spare capacity on these lines at peak times, some improvements will take place with the future plans of Transport for London. The highway network in the area is congested through the town centre (past the street market) and south of the A4. (para 8.95)*
- *Employment creation to more than replace the potential loss of the exhibition centre (para 8.111)*



4 Baseline Conditions

4.1 WALKING AND CYCLING

4.1.1 Transport policies at all levels encourage walking and cycling as being the most sustainable and low-impact modes of travel. PPG13 highlights the potential for walking to replace short car trips, especially for journeys under 2km. It also notes that cycling has the potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

WALKING

4.1.2 According to the Mayor of London's website, almost seven million walking journeys on foot are made in London every day and walking accounts for 80 percent of all trips under one mile. Walking is a cost effective, accessible, healthy and enjoyable form of travel, and is a compulsory element of any journey.

4.1.3 The Walking Plan for London – '*Making London a walkable city*' was published by the Mayor in February 2004 to promote walking. The Plan adopts the 'the 5 'Cs' from the London Planning Advisory Committee (LPAC) Walking Strategy for London as key indicators of walkability which are; Connected, Convivial, Conspicuous, Comfortable and Convenient.

4.1.4 The principal shortcomings in the Regeneration Area are the poor pedestrian environment along the A4 and the relative impermeability of the pedestrian network across the West London Line and through the privately-owned Earls Court and Olympia sites.

4.1.5 As there is no direct through route from the LBHF Site to the town centre, residents currently need to use the A4 West Cromwell Road to access Earls Court Road. For example, from Gibbs Green Close (part of the LBHF site) to the junction of Earls Court Road/Nevers Place; the crow fly distance is approximately 815m equivalent to a 10 minute walk whilst the distance walking along the accessible streets would be approximately 1.3 kilometres equivalent to a 16 minute walk

4.1.6 Warwick Road is a predominately residential street with the exception of the Exhibition Centre with good, well maintained and lit footways. Informal crossing points including tactile paving to facilitate north-south movement. There are signalised pedestrian crossings at its junction with the A4 West Cromwell Road and Old Brompton Road and between the tube station and Exhibition Centre. There is, however, a lack of crossing points at intermediate locations along the street which would facilitate crossing movements between the footways along either side.

4.1.7 The A4 is a significant barrier to pedestrian movement; a complicated multi-stage pedestrian crossing is provided at the A4 West Cromwell Road/Warwick Road junction to negotiate the multiple lanes of traffic on a very wide carriageway.

4.2 CYCLING

4.2.1 The London Cycle Network (LCN) is a network of signed routes for cyclists across the capital. Over 550km of the 900km network has been completed to date; final completion is due by the end of 2010. TfL are also investing in an off-road network of routes through London's parks, and along the capital's waterways.

4.2.2 There are some established LCN cycle routes of varying significance in the immediate vicinity. An existing signposted radial route runs along the southern edge of



the site (Lille Road) and a 'recommended' route lies off the north western edge of the area which connects across West Cromwell Road, towards Olympia. The LCN around the Regeneration Area is shown on the following plan.



Figure 3.1: London Cycle Network

4.2.3 However, the Regeneration Area is a notable gap in the existing cycle network in West London. The North End Road, Cromwell Road and the rail corridor present significant barriers to radial and orbital cycle journeys in the vicinity of the area, whilst the Exhibition Buildings and surrounding estate are impermeable to cycle movements across the zone. Consequently, there are no current proposals to improve the cycle network within the Regeneration Area.

4.3 PUBLIC TRANSPORT ACCESSIBILITY

4.3.1 Transport policies place an emphasis on the integration of land use, transport and planning decisions. In particular, the policies stress the need to create more sustainable patterns of development by delivering accessibility.

4.3.2 The accessibility of sites to public transport, particularly those located in London has, since the mid 1990s, been defined by reference to a Public Transport Accessibility Level (PTAL). This methodology identifies an index as a measure of accessibility. This index is expressed as a grade from 1 to 6 where 1 is the lowest and 6 the highest level of accessibility.

4.3.3 The area benefits from high accessibility (up to PTAL 6) with the exception of a PTAL 3 area in the centre of the Regeneration Area. This reduced accessibility arises



due to the lack of permeability across the area and the lack of public transport services currently entering the site due to existing infrastructure.

4.4 BUSES

4.4.1 The existing bus network is shown on Figure 3.2.

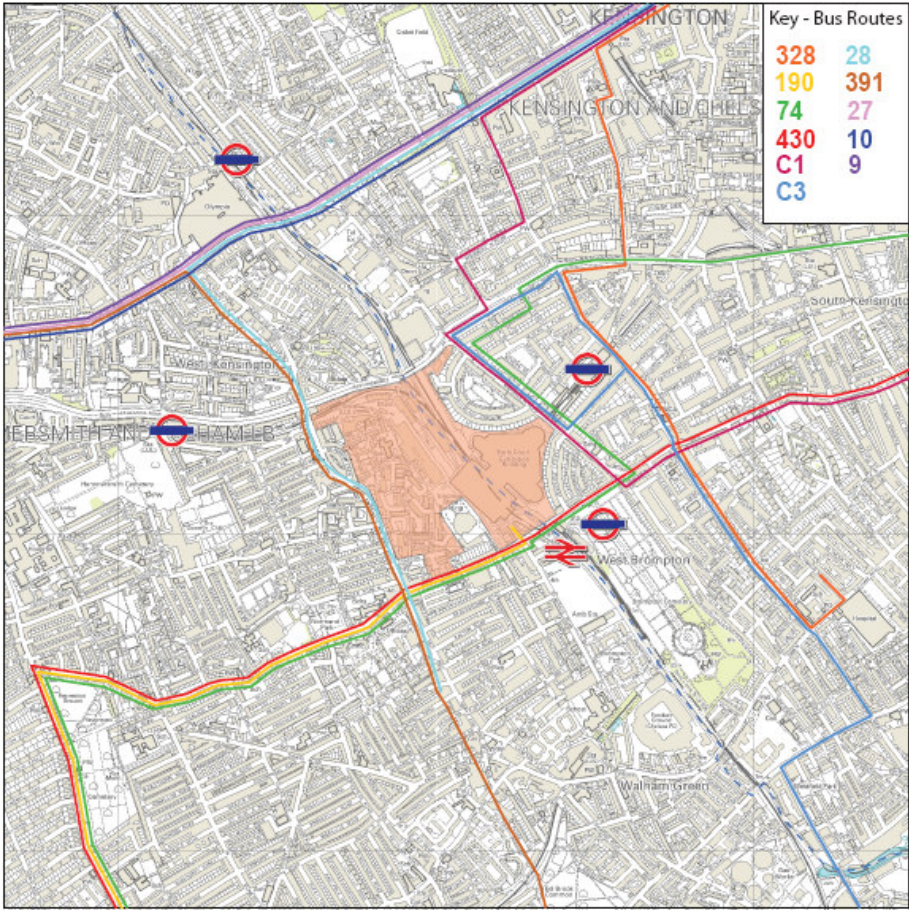


Figure 3.2: Bus Network

4.4.2 The Inner West London bus network was enhanced in late-2006 / early-2007 in order to complement the Western Extension Zone of the London congestion charge scheme. These improvements added a passenger capacity of more than 4,800 in the peak hour, demonstrating the relative ease with which the bus network can be enhanced in a short time scale

4.4.3 However, some bus improvement proposals were frustrated by a lack of bus priority measures and bus standing areas. In addition, the bus priority network around the Regeneration Area is under-developed, with only limited sections of bus lane on North End Road. The lack of bus priority means that services are vulnerable to delays caused by traffic congestion.

4.4.4 A further limitation of the Inner West London bus network is the lack of available land for bus interchanges and operational bus stands. The flexibility of the bus network entails that bus routes have often been established and extended on a “piecemeal” basis, with the result that the network can be fragmented.

4.4.5 For example, around the Regeneration Area there are bus stands:

- between the Empress State Building and Earls Court 2 for the 190 route only;



- at the Warwick Road / West Cromwell Road Tesco for the C3 only;
- at World's End, Chelsea for the 328 only;
- at Notting Hill Gate for the 390 only; and
- near Craven Cottage for the 424 only.

4.4.6 The standard of bus / rail / Underground is also generally poor at the surrounding West Brompton, Earls Court, West Kensington and Kensington Olympia stations.

4.5 RAIL

4.5.1 Rail connections around the Regeneration Area are extensive and provide important links at all geographic scales (local, metropolitan, regional and national) to accommodate increased patronage and are likely to be a main mode of travel for residents, workers and visitors alike.

4.5.2 Understanding the railway services and the connections they offer is key to understanding the way people will access the site in the future. In order to do this Halcrow undertook service analysis at the following stations:

- West Brompton,
- Earls Court,
- West Kensington,
- Kensington Olympia

4.5.3 The following is a list of projects which are likely to feature and have an effect on this project:

- West Coast Main Line timetable change – December 2008/9
- LOROL Service Level 2 timetable (4 trains per hour between Clapham and Willesden/Stratford)
- Interchange with Central Line at White City
- Capacity Improvements on the Piccadilly and District lines
- Southern RUS comments on Gatwick - Watford service and any changes likely to be implemented during the life of the Southern franchise
- LOROL orbital service (2011 for East London Line and later for links to South London)
- Shepherds Bush interchange
- Cross London RUS

4.5.4 On Network Rail, the main constraint to capacity is likely to be the frequency of services on lines that adjoin the West London Line. At the north end of the West London Line (WLL) there are junctions with the North London Line, the Great Western main line (via the South West Sidings route) and the West Coast Main Line (WCML) all of which are heavily used by freight and passenger services. To the south there are two routes to Clapham Junction, a disused route to Waterloo, a route to Victoria via the Battersea reversible line and to the South Eastern network via Factory Junction.

4.5.5 Plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. PPP upgrades due by 2017 are planned for the eastbound Piccadilly and District Lines, as well as the portion of the District Line



between West Brompton and Earl's Court stations, bringing significant relief to each. Providing a new option for those travelling east / west, Crossrail will also assist in further reducing congestion by diverting passengers from the Underground routes in that direction.

4.6 HIGHWAY NETWORK

4.6.1 The Regeneration Area is bounded by the A4 Talgarth Road / West Cromwell Road (to the north), Warwick Road (to the east), North End Road (to the west) and Lillie Road / Old Brompton Road (to the south).

4.6.2 The highway network designations are highlighted on the plan below.

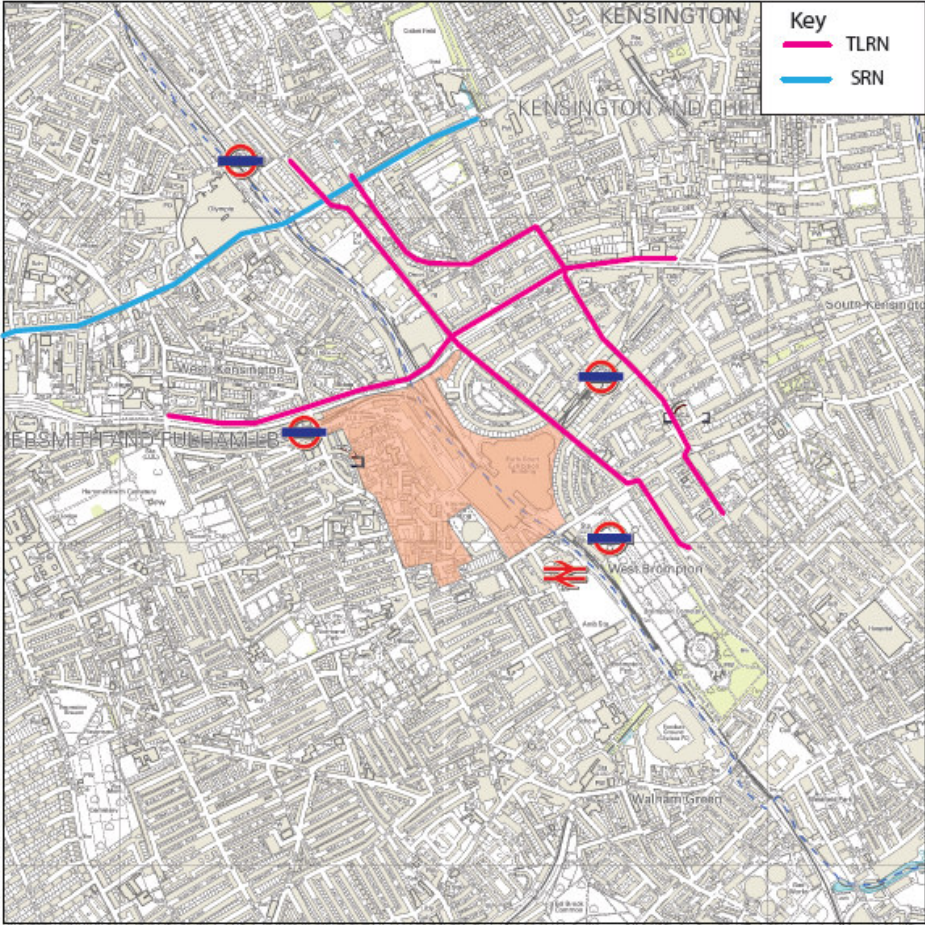


Figure 3.3: Highway Designations

4.6.3 The A4 Talgarth Road / West Cromwell Road and the Warwick Road / Earls Court Road one-way pair all form part of the Transport for London Road Network (TLRN), and the A315 Hammersmith Road / Kensington High Street is part of the Strategic Road Network (SRN).

4.6.4 Weight restrictions are in place on some railway bridges. To the north at Hammersmith Road railway bridge is a 12 tonne restriction. To the south at Fulham Road is a 7.5 tonne restriction. No weight restrictions apply to West Cromwell Road railway bridge. Sections of Lillie Road and the A219 Fulham Palace Road are also subject to a width restriction of 2.1m.

EXISTING TRAFFIC FLOWS



4.6.5 The latest traffic flow information for the AM and PM peaks is presented on the following images, which are based on post-extension survey data gathered by WSP in 2007 and 2008. The traffic surveys were all undertaken during periods when no event was in progress at Earls Court.

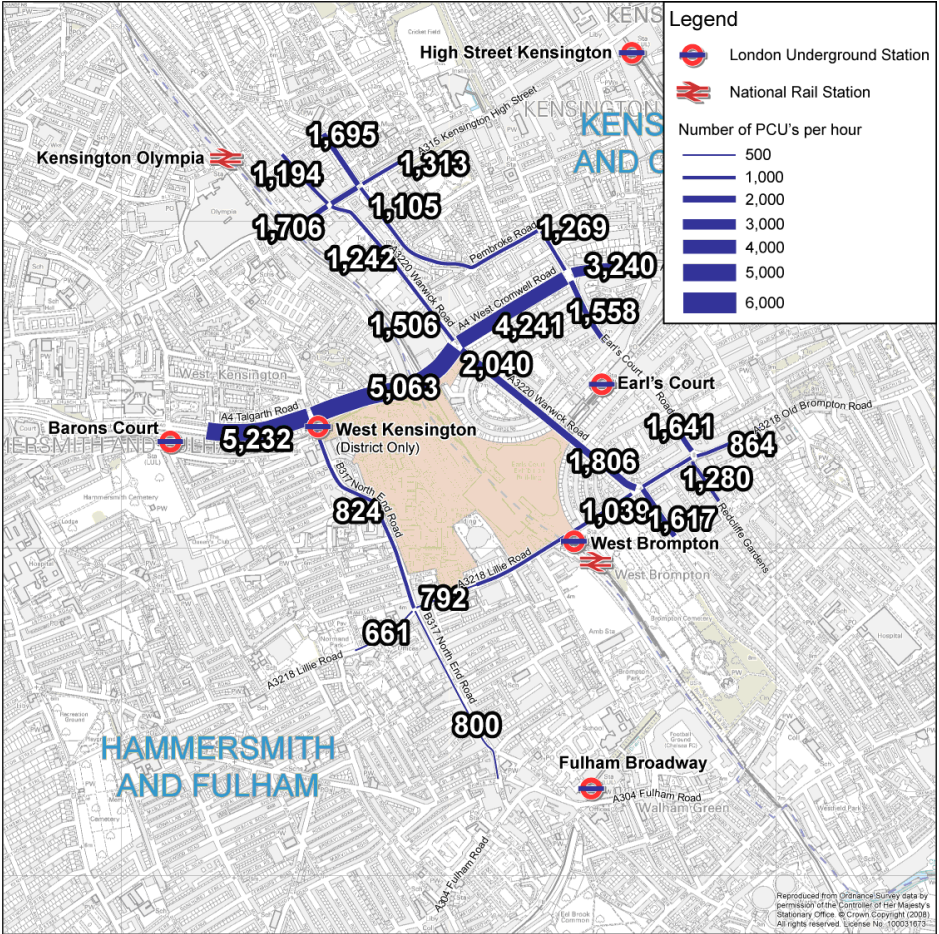


Figure 3.4: AM Peak Hour Traffic Flows (two-way totals)

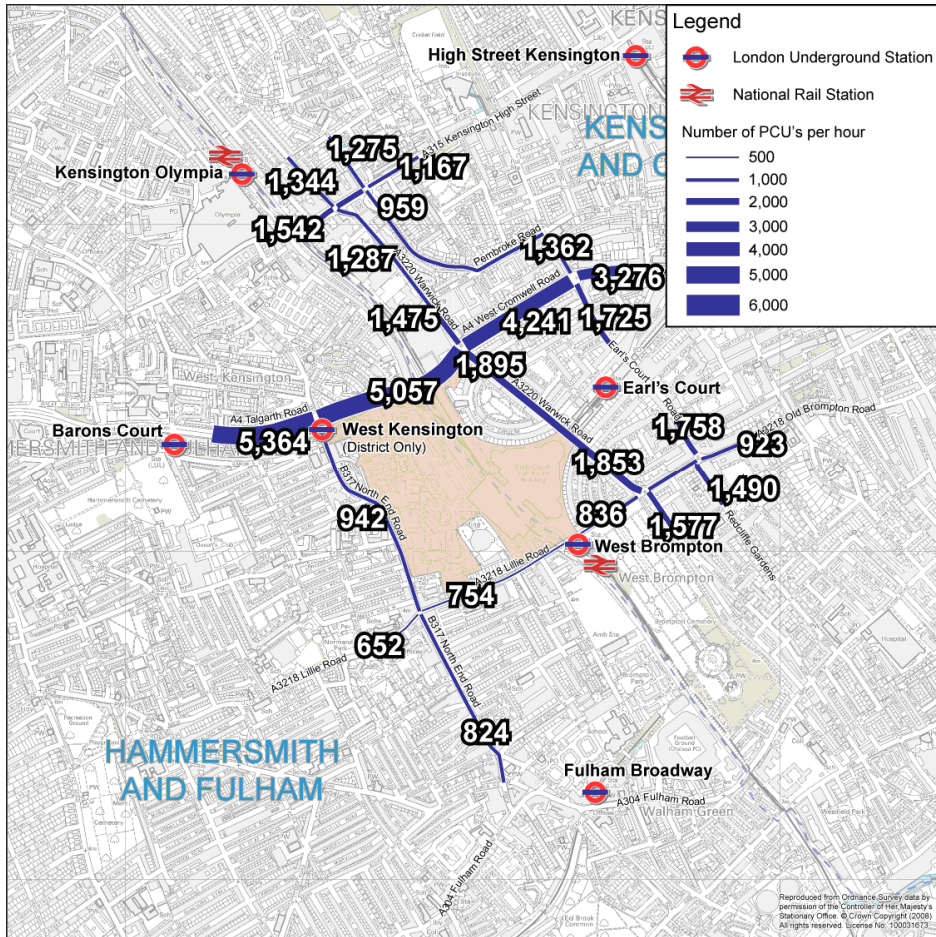


Figure 3.5: PM Peak Hour Traffic Flows (two-way totals)

4.6.6 These Figures show that the dominant movement through the area is east-west through traffic, followed in magnitude by the north-south through traffic. The detail of the individual junction turning movement surveys also shows there is a substantial west-south through movement from the A4, turning right onto Earls Court Road and then continuing south on Redcliffe Gardens. The reverse movement from Finborough Road north to Warwick Road and then turning left onto the A4 westbound is also a dominant movement (half of the Warwick Road traffic approaching the A4 subsequently turns left onto the A4).

EXISTING TRAFFIC GENERATION

4.6.7 The existing traffic movements which are generated by the current uses of the Regeneration Area have been surveyed.

4.6.8 The existing Earls Court exhibition centre traffic movements have been studied in detail with extensive analyses of the exhibition centre servicing and commercial vehicle marshalling procedures. It was found that the existing traffic generation is subject to considerable variation, depending on the events taking place at Earls Court at any one time.

4.6.9 The existing traffic generation therefore varies from a minimum of some 400 vehicles per hour up to around 1000 vehicles per hour. Much of the peak traffic is composed of van and lorry-sized delivery vehicles associated with the build-up and break-down of exhibition events.



EXISTING HIGHWAY CAPACITY

4.6.10 WSP has carried out junction capacity modelling of the key junctions on the local highway network. This initial feasibility exercise has demonstrated areas where there is existing highway capacity, and other areas with scope for improvements. Further junction capacity modelling will be carried out independently by TfL.

4.7 SUMMARY

4.7.1 The Regeneration Area benefits from a high level of public transport accessibility across the majority of the area. The principal shortcoming in the Regeneration Area at the moment is the lack of internal connectivity for all modes of travel for the types and intensity of uses contemplated through redevelopment. The dominance of the road network and presence of railway lines reduce pedestrian connectivity in certain areas. The bus priority network and London Cycle Network is also sparse within the vicinity of the Regeneration Area. The Regeneration Area transport strategy will consider opportunities for addressing these issues in collaboration with relevant local authorities and key stakeholders and is discussed further in Section 5 of this study.



5 Transport Impact

5.1 TRAVEL DEMAND ASSESSMENT

5.1.1 A travel demand forecast has been calculated from the indicative land use budget summarised below.

Table 4.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

5.1.2 Each element of the indicative land use budget has been discussed with the relevant specialist in the Capital & Counties team to ensure that the travel demand assessment is an accurate reflection of the specific forms of development which could come forward in each land use category.

5.1.3 The forecasting exercise has referred to the following information sources and is based on:

- TfL's TRAVL database information;
- trip generation estimates by mode, using data which has been accepted by RBKC, LBHF and TfL recently in respect of other nearby development proposals
- Census Output Area data for nearby locations
- The sustainable transport strategy which is being developed for the Regeneration Area.

5.1.4 Based on these preliminary studies, the total travel demand for the proposed residential, office, hotel and retail uses is likely to be in the region of 20,000 and 19,000 two way person trips in the AM peak and PM peak hours respectively. The modal share for these trips would reflect the accessibility of the area:

- It is predicted that approximately 70% of journeys will be by public transport modes;
- Walking would be the next most significant mode of travel accounting for approximately 16% of journeys (main mode);
- Car driver trips would be minimal accounting for approximately 3% of journeys.

5.1.5 It should be noted that the mix of complementary land uses within the indicative land use budget will reduce the need to travel by providing shopping, and leisure opportunities and social/ community facilities within walking distance of residents living in the area.



5.2 PEDESTRIANS

5.2.1 The land use budget would generate large pedestrian flows, which mostly arise due to people walking between the nearby Earls Court, West Brompton and West Kensington stations and the Regeneration Area.

5.2.2 The key areas to be addressed will be the possible upgrading of station access capacity to cater for these additional pedestrian flows and the provision of high-quality and high-capacity crossing points on pedestrian desire lines which cross busy roads.

5.2.3 The change in pedestrian flows in the wider area beyond the stations will be less significant, but will need to be studied in detail to ensure a satisfactory level of service and upgrading where required.

5.3 CYCLING

5.3.1 The potential demand would result in a large increase above existing cycle flows in the area. This creates a need for high-quality cyclist facilities within the Regeneration Area, including cycle parking, cycle lanes and showering / changing facilities throughout the proposed land uses.

5.3.2 The uplift in cycling demand is such that the off-site cycling network will need to be upgraded in order to provide safe and attractive routes.

5.4 BUSES

5.4.1 Bus demand would also increase significantly, thus generating a need for bus service improvements to add capacity to the network and for on-site and off-site bus priority and other infrastructure to improve the attractiveness of bus travel.

5.4.2 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider – local and metropolitan – transport network and to providing sustainable transport options.

5.4.3 On-site facilities should include modern bus interchanges which link with the tube and train stations to improve the integration of public transport journeys, plus dedicated on-site bus lanes to improve journey times and the reliability of bus journeys relative to car travel. These should be considered alongside bus improvements to the surrounding area.

5.5 RAIL

5.5.1 As discussed in Section 3.5, a number of plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. Collectively these improvements create the significant new rail capacities necessary to ensure the full redevelopment of the Regeneration Area given its central location and proposed future as a sustainable mixed use district and can accommodate, with some modifications, the movement demands anticipated.

5.5.2 Specific improvements over and above those already contemplated under the PPP and Crossrail initiatives may be required in the AM peak inbound to add service to the West London line and to relieve inbound congestion on the District Line from Putney. Halcrow has developed a number of supporting plans and new base timetable that will allow increased demand to be catered for.

5.6 HIGHWAY NETWORK

5.6.1 The potential net impact on the highway network has been forecast within a range, which depends on whether it is compared against an existing event taking place



at Earls Court Exhibition Centre, or whether it is considered against the situation where Earls Court Exhibition Centre is not in use.

5.6.2 For the existing situation where a large event takes place at Earls Court Exhibition Centre, the forecast shows an overall 2% reduction in traffic on the surrounding road network. This is due to the high traffic generation of existing Earls Court Exhibition Centre shows, especially for the build-up and break-down periods where high volumes of large exhibitors' vehicles access the EC 1+ 2 site. The indicative land use budget would generate less traffic than the existing large Earls Court Exhibition Centre events.

5.6.3 When the comparison is based on a scenario where there is no event at Earls Court Exhibition Centre, the outcome is a 2% increase in traffic across the surrounding road network. There is scope for this level of traffic impact to be accommodated, subject to highway capacity improvements, traffic signal re-timing and better traffic management.

5.7 SUMMARY

5.7.1 The indicative land use budget is anticipated to result in approximately 20,000 and 18,700 two way person trips in the AM and PM peak hours respectively. The increased demand resulting from the indicative land use budget could be accommodated through infrastructure improvements across the local transport network.



6 Transport Strategy

6.1 OVERVIEW

6.1.1 The high-level objectives of the Regeneration Area sustainable transport strategy are:

- to mitigate existing transport problems;
- increase accessibility across the area; and
- to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings.

6.1.2 Possible measures to deliver the high level objectives listed above are discussed in detail below. These measures would contribute to both RBKC's and LBHF's aspirations for the development of the Earl's Court area as set out in Section 3.4.

6.1.3 Underpinning the transport strategy is the concept of complementary land uses which have the potential to achieve the PPG13 aims of promoting mixed use development in city, town and district centres, and near to major public transport interchanges in order to achieve vitality and diversity and promote walking as a primary mode of travel.

6.1.4 The proposed transport measures will perform best if they are implemented and managed in an integrated manner, and their effects monitored and reviewed as the development progresses.

6.1.5 The transport strategy will be designed to deliver the long term governance of the transport proposals, maximising their effectiveness in relation to the proposed land uses and the surrounding area, incentivising the achievement of sustainable travel patterns, and delivering the transport outcomes required for the development. The transport strategy will be discussed extensively with TfL, the Boroughs and other stakeholders.

6.2 WALKING & CYCLING

6.2.1 It is recognised that physical aspects of new development will influence travel patterns and can reduce dependence upon the private car. An integral part of promoting sustainable travel will therefore be the design of the development which should prioritise cyclists and pedestrians.

6.2.2 A network of connections could link roads, pedestrian connections and pathways leading to important destinations, such as the Underground stations, major public open spaces and shopping, and connect the area to adjacent neighbourhoods. Extensions to the London Cycling Network should be an integral feature of this network. The design of the overall network should provide a hierarchy of connections, the logic of which can easily be understood by residents as well as visitors. The elements of the network (roads, pathways, etc) should provide sufficient space and a public realm to ensure a comfortable walking or cycling experience. The routes should be well-maintained and legible with lighting, signage and the use of quality materials.

6.2.3 Additional measures that could be considered include:

- Cycle parking in excess of planning standards;



- A bike zone, with public cycle hire and maintenance facilities; and
- Electric charging points for powered cycles, based on renewable energy sources such as solar.

6.2.4 In February 2008, the Mayor announced a new programme aimed at achieving a growth in cycling of 400 percent by 2025. This would mean that five percent of all trips in London were made by bike. The three strands of the programme are:

- Bike hire in central London, providing a new public transport mode for short business and visitor trips;
- Cycling corridors, offering commuters with high profile, clearly signed priority routes from inner to central London; and
- Bike Zones, covering a radius of about 5km around London's town centres, incorporating 20mph speed limits, cycle priority streets, greenways and a network of cycle-friendly routes to link schools, stations, residential areas and workplaces, supported by cycle training, parking and travel planning.

6.2.5 The location and land use patterns in the Regeneration Area have potential to benefit from the proposed cycling corridors and Bike Zones.

6.3 BUSES

6.3.1 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider transport network and to providing sustainable transport options. The following initiatives should be further explored as ways of achieving these objectives:

- Create / improve interchange between buses, rail and underground at West Brompton, Earls Court and West Kensington;
- Create a new on-site bus interchange and extend the surrounding bus routes into the site;
- Create through-routes for buses, with on-site bus priority;
- Propose off-site bus priority and infrastructure improvements;
- Increase the frequency of existing bus services; and
- Propose bus links to key locations and areas which lack a tube or rail connection, such as the Kings Road area and other poorly-served areas of both Boroughs.

6.4 RAIL

6.4.1 Halcrow has undertaken extensive work to consider a number of alternative measures that could be delivered to avoid any potential hotspots on the network and improve capacity on the West London Line (WLL), including the possible introduction of a new base timetable to accommodate the increased demand.

6.4.2 A preferred option would be providing additional services from Clapham Junction to Shepherd's Bush, turning around at North Pole Depot with an extension to Watford to offer a frequent service on the WLL and additional hourly connection with the West Coast Main Line.

6.5 HIGHWAY NETWORK

6.5.1 The proposals will seek to contribute to the aspirations that both RBKC and LBHF has for the area by providing strategic benefits for the highway network through its design. The specific alignments and connectivity of any future road system would be



dependent on the character of the redevelopment; however the following measures would be considered:

- Assessment of any contribution (as required and related to the development) to the tackling the Earls Court One-Way system;
- Provide a north/ south route through the Regeneration Area, which has the capacity to relieve through traffic from both directions of the Earls Court One-Way system. Initial assessments have indicated that the level of relief could be sufficient to achieve :
 - reduced traffic impact
 - improved local air quality
 - reduced community severance
 - improved pedestrian and cyclist conditions
 - improved bus facilities
 - better on-street loading and parking for local businesses;

This concept would need to be assessed in further detail and its implementation would be dependent on extensive consultation and the progress of statutory procedures. The phasing of its delivery relative to other elements of the Regeneration Area would need to be considered carefully

- Improvements to the A4 / North End Road junction to provide an opportunity to improve bus/tube interchange at West Kensington station and increase capacity where possible for north-south traffic and for movements into the area;
- Reduce impact on local roads by providing direct access from the A4;
- Locate accesses at existing points (e.g. the Earls Court, West Brompton and Lillie Road forecourts) and at existing side roads from North End Road which have potential to be connected into the area;
- Provide a separate service road under raised parts of the development. There are potential alignments that could follow the main north / south track corridor; one could run north from Lillie Road at the bridge location to the west of the tracks. Further detailed studies would be undertaken in association with a specific development proposal to determine the alignments and design of these routes;
- Consider the potential for an Urban Consolidation Centre (UCC) to reduce service vehicle movements in the area, with on-site electric-powered vehicles to distribute goods around the Regeneration Area with zero carbon impact.
- Develop Travel Demand Management (TDM) measures in liaison with the project partners and planning authorities, such as:
 - Potentially promoting low-emission Car Clubs on the sites
 - encouraging public transport, walking and cycling
 - adopting parking ratios below the maximum standards, and controlling off-site parking impacts
 - implementing Travel Plans for the residential and commercial uses
 - personalised travel planning;
- Promote a Low Emission Strategy, in line with the Beacon Councils Air Quality Group recommendations (RBKC is a member of this Group); and



-
- Examine the potential for electric car charging stations based on renewable energy sources such as solar.

6.6 SUMMARY

6.6.1 The transport strategy for the Regeneration Area will contain a package of measures to encourage local travel and travel by sustainable modes. The developer will work with local stakeholders and local authorities in preparing and implementing the strategy as a masterplan for the Regeneration Area progresses. Measures that could potentially be included in the strategy have been considered above. However, the specific measures will be dependent on the character of the redevelopment with due consideration to the Borough’s aspirations for the area.



7 Conclusions

7.1.1 This Summary Transport Study is a technical evidence base document which supports the Earls Court Regeneration Area. The study has considered the transport implications of an indicative land use budget for the Regeneration Area.

7.1.2 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

7.1.3 The provision of additional transport infrastructure to support the Regeneration Area would be complemented by a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and minimise car dependency, in line with national, regional and local policy aims. These measures have the potential to improve a number of existing transport issues in RBKC and LBHF and will be developed as a Masterplan for the Regeneration Area evolves.



Earls Court Regeneration Area Core Strategy Evidence Base Summary Transport Study

Capital & Counties on behalf of Earls Court and
Olympia Group

June 2009





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1 Executive Summary

1.1.1 This technical report provides evidence in support of the Earls Court Regeneration Area in relation to transport matters.

1.1.2 The Earls Court Regeneration Area covers 27 hectares and comprising:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

1.1.3 The indicative land use budgets assessed in this report are based on 1,380,000 to 1,640,000 sq m of development comprising a comprehensive mix of complimentary land uses to provide a sustainable community for the area.

1.1.4 The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study would therefore be subject to further review as any development proposals progress.

1.1.5 Most of the Regeneration Area benefits from a high level of public transport accessibility and there is scope to improve this further. Regeneration of this area is in line with planning policies that seek to locate major new developments in proximity to transport infrastructure. The transport implications of the indicative land use budget have been assessed and are reflected in the transport strategy considered in this study.

1.1.6 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

1.1.7 The transport strategy will include a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and reduce car dependency, in line with national, regional and local policy aims. The proposals support the Borough’s aspirations for the area and will provide strategic benefits to the transport network by helping to tackle a number of existing issues which have been identified in the draft Core Strategy.

1.1.8 The transport strategy aims to mitigate existing transport problems, increase accessibility across the Regeneration Area and to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings. Subject to the outcome of the core strategy consultation, it is the intention to develop the transport strategy in close liaison with RBKC, LBHF, TfL and other stakeholders as the Core Strategy and the masterplanning process move forward.

1.1.9 Based on the indicative land use budget, the development proposals are anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. The increased demand resulting could be accommodated through infrastructure improvements across the local transport network.

1.1.10 The indicative land use budget would generate less traffic than existing large Earls Court Exhibition Centre events

2 Introduction

2.1 SCOPE OF STUDY

2.1.1 WSP and Halcrow have been appointed to advise Capital and Counties on behalf of the Earls Court and Olympia Group on the transport aspects of a potential redevelopment of the Earls Court Regeneration Area. This study forms part of the evidence base for the Regeneration Areas. The Regeneration Area comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.2 The summary study considers the transport implications of a potential development scenario on the transport infrastructure in the vicinity of the Earls Court Regeneration Area, which covers 27 hectares and comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.3 For the purpose of the technical analyses in this study, an indicative land use budget of 1,380,000 to 1,640,000 sq m has been assumed for the Regeneration Area. The breakdown of this overall total is provided in Table 1.1. The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study will therefore be subject to further review as masterplanning and any development proposals progress

Table 1.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

2.2 REPORT STRUCTURE

2.2.1 This study provides an initial technical briefing, which will in due course inform any future masterplanning process. It sets out the potential transport issues, constraints and opportunities for the Regeneration Area drawing on work undertaken to date and the findings of preliminary studies of the existing situation. It also provides suggestions for the development of a sustainable transport strategy to build on the significant potential of the area to deliver a highly sustainable development. The remainder of the study is set out as follows:



-
- Section 1 is an Executive Summary
 - Section 2 is an Introduction to the context of the summary study
 - Section 3 provides an overview of relevant transport policy in relation to the site;
 - Section 4 reviews the existing transport infrastructure in the vicinity of the site;
 - Section 5 considers the potential transport impacts based on the indicative land use budgets;
 - Section 6 discusses the potential Regeneration Area transport strategy; and
 - Section 7 concludes and summarises the findings of this study.



3 Policy Overview

3.1 NATIONAL

3.1.1 The Government's over-arching strategy is set out in Planning Policy Guidance Note 13 (PPG13), which emphasises the key themes of sustainable development. The document reinforces the message that there must be greater integration of planning and transport in order to promote more sustainable transport choices and reduce the need to travel, especially by private car.

3.1.2 The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices and to promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling. It therefore advocates:

- actively managing the pattern of urban growth to make the fullest use of public transport;
- increased intensity of development at locations which are highly accessible by public transport, walking and cycling;
- reducing the amount of parking in new developments, as part of a package of planning and transport measures to promote sustainable travel choices;
- promoting mixed use development, which can provide very significant benefits in terms of vitality and diversity and in promoting walking as a primary mode of travel;
- producing a broad balance at the strategic level between employment and housing, to minimise the need for long distance commuting;
- focussing mixed use development involving large amounts of employment, shopping, leisure and services in city, town and district centres, and near to major public transport interchanges (see paragraph 20); and
- encouraging a mix of land uses, including housing, in town, suburban and local centres.

3.2 REGIONAL

THE LONDON PLAN (CONSOLIDATED WITH ALTERATIONS SINCE 2004)

3.2.1 The Plan sets out policies to help London manage significant growth in London's population and jobs. In terms of transport and development, the key themes are:

- encouraging proposals for large residential developments in areas of high public transport accessibility, including the provision of suitable non-residential uses within such schemes;
- encouraging patterns and forms of development that reduce the need to travel especially by car;
- seeking to improve public transport capacity and accessibility where it is needed;
- supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity; and



- ensuring that on-site car parking at new developments is the minimum necessary, with no over-provision that could undermine the use of more sustainable non-car modes.

A NEW PLAN FOR LONDON (APRIL 2009)

3.2.2 In July 2008 a consultation document 'Planning for a Better London' was published outlining the approach that was proposed to the revision of the London Plan. The next stage of this review is the publication of 'A New Plan for London'. It is intended that the new London Plan would be completed in around four years, with various supplementary planning documents being issued in the meantime.

3.2.3 Pages 61 to 65 of A New Plan for London discuss policy considerations related to London's Transport networks. It states the following objective;

- *A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan.*

3.2.4 Reference is also made to a co-ordinated approach to land use and transport planning stating:

- *Close co-ordination of the provision of transport infrastructure and services with land use development is essential to support London's continued development and growth. Good public transport access will not in itself guarantee development but it is a necessary condition for a successful city – one in which everyone has easy, safe and convenient access to jobs, opportunities and facilities.*

3.2.5 There is also an emphasis on delivering reduced congestion within London's streets and providing environments suitable for all users It states:

- *London's streets perform a variety of functions – they should provide a safe and pleasant means of travelling on foot, by cycle, bus or car; and act as a network of attractive public spaces in which people can interact. The new Plan will emphasise facilitating essential access for people, goods and services, and give strong support for cycling, walking and taking the bus – in town centres, other parts of Outer London and across central London.*

3.2.6 Page 64 states that in reviewing the London Plan the Mayor proposes to:

- *Develop a new, criteria based, approach to road schemes which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve;*
- *Tackle congestion and traffic reduction, including investigating road user charging in the future;*
- *Allocate street space in line with MTS priorities, including shared space, where appropriate, (taking account of the safety of all pedestrians, particularly visually impaired people); improve conditions for buses; and investigate coach hubs;*
- *Substantially strengthen policy on walking and support the "Legible London" initiative;*
- *Put in place strong policies supporting cycling, with reference to the Velib cycle rental scheme and cycling superhighways;*
- *Develop new cycle parking standards; and*
- *Strengthen policy on public realm enhancements.*



THE MAYOR'S TRANSPORT STRATEGY 2001

3.2.7 This document supports the Mayor's vision of London as an exemplary sustainable world city. The Transport Strategy aims to increase the capacity, reliability, efficiency, quality and integration of London's transport system to provide the world class transport system the capital needs. The ten key transport priorities which flow from this are:

- reducing traffic congestion;
- overcoming the backlog of investment in the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services;
- making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing the frequency of services;
- better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London wide, high frequency 'turn up and go' Metro service;
- increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving access to international transport facilities; improved orbital rail links in inner London; and new Thames river crossings in east London;
- improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice;
- supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better maintenance of roads and bridges, and improved co-ordination of streetworks;
- making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts;
- improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion; and
- bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environment.

MAYOR'S TRANSPORT STRATEGY – STATEMENT OF INTENT (MAY 2009)

3.2.8 A new transport strategy is currently under consultation with the London Assembly and GLA Group, prior to a full draft which will be subject to public consultation in Autumn 2009. Publication of the final new strategy is scheduled for early 2010.



3.2.9 The draft principles are largely in line with the current Transport Strategy, but with more emphasis on the transport needs and viability of Greater London as a whole rather than focusing on Central London. Key themes include: ensuring a lasting transport legacy at the Olympic and Paralympics Games venues including Earls Court; improving transport opportunities with significant investment in public transport, walking, cycling; and tackling climate change through measures, such as, ensuring at least 20 percent of parking spaces in new developments have charging points for electric vehicles.

3.2.10 The existing proposals largely relate to the projects and proposals already committed to in TfL's nine-year Business Plan. In addition, they also include those improvements to the National Rail network to be delivered by Network Rail and the Government up to 2014, as part of the current High Level Output Specification Control Period 4 funding package, and by other major agencies (e.g. BAA and the Highways Agency) delivering transport improvements impacting on London.

3.2.11 The document also confirms the Mayor's intention to remove the Western Extension Zone (WEZ) of the Congestion Charging zone, following a non-statutory consultation with the public and stakeholders. In the future, wider road user charging may be explored in the context of a national scheme and charging in town centres may also be considered. Other measures, such as, upgrading signal control junctions, improving the management of roadworks and road enhancements will be used to mitigate the effects of the removal of the WEZ.

LONDON FREIGHT PLAN (OCTOBER 2007)

3.2.12 The London Freight Plan sets out the steps that should be taken over the next five to ten years to identify and begin to address the challenge of delivering freight sustainably in London.

3.2.13 The Plan has no statutory force, but has been developed to implement the Mayor's Transport Strategy, and is a material consideration for planning. The same principles underpin the Mayor's Transport Strategy.

3.2.14 The specific policy aims are to:

- Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing in order to support London's economy;
- Minimise the adverse environmental impact of freight transport and servicing in London;
- Minimise the impact of congestion on the carriage of goods and provision of servicing and;
- Foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practicable.

3.3 LOCAL

RBKC ADOPTED POLICY

3.3.1 The 2002 Unitary Development Plan (UDP) recognises that many of the transport-related issues affecting RBKC need to be viewed and resolved in a London-wide context, as well as reflecting residents' interests. It also acknowledges that solutions to many transport challenges require a coordinated, strategic approach by government and its agencies, transport authorities and transport providers and operators.



3.3.2 It proposes an effective transport system that is integrated with land-use planning and is based on patterns of land-use which reduce the need to travel and promote the use of public transport, walking and cycling as alternatives to the private car.

3.3.3 RBKC has formulated eight principal strategic policies within the former UDP. In the revised UDP, the number of principal strategic policies has reduced to three and those relating to transport issues are:

- STRAT 5: To ensure that further visitor related development locates in places that are well served by public transport and does not harm the residential character or amenity of the Borough.
- STRAT 7: To promote sustainable development through locating high trip generating uses in areas which are or will be well served by public transport and by encouraging the local provision of services and facilities to reduce the need to travel.

3.3.4 RBKC has adopted the following objectives for transport in the Borough:

- locate high trip-generating activity in areas well served by public transport;
- improve access to all land uses, especially for those with special mobility needs through the efficient use of the transport network;
- reduce the need to travel and, in particular, the number and length of motor vehicle trips by ensuring that development is located appropriately;
- promote measures to reduce the need to travel;
- reduce overall levels of road traffic in the Borough;
- reduce air pollution from road traffic and the noise nuisance caused by transport;
- increase the proportion of journeys made on foot and by bicycle;
- improve public transport so it is more convenient and reliable to use, is better able to meet demand and is attractive as an alternative to the private car;
- reduce the number and severity of road accident casualties;
- minimise the adverse effects of traffic in the Borough, particularly on the environment of residential areas and shopping centres;
- ensure that development does not add to on-street parking stress, in particular where demand is already saturated; and
- ensure that changes to the transport infrastructure improve the Borough's townscape.


3.3.5 These objectives are reflected in strategic transport policies STRAT 25, STRAT 26, STRAT 29 and STRAT 35.

3.3.6 Policy TR28 states that RBKC will:

“resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough’s Road Network.

Consideration may be given to limited additional highway provision where there will be no overall opportunity to increase the volume of traffic passing through the Borough. Actual proposals are likely to be limited but where proposals are advanced, complementary traffic management schemes will be designed to limit the possibility of adding to traffic volumes.

The Council, however, has supported, for a long time, road proposals that could provide some relief to the Earls Court one-way system. This support should also extend to



signage changes to re-route long distance traffic from these roads, which are linked with the Council's desire to see the Earl's Court One-Way System and the Embankment removed from London's Strategic Road Network. The Council supports means of improving the access to Earls Court Exhibition Centre, in order to reduce the number of commercial vehicles and coaches from the residential areas around Earls Court. The Council has supported an access road for lorries running north of the Centre, alongside the West London Line and beneath the West Cromwell Road, linking with Warwick Road."

RBKC DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.7 Section 5 of the "Places" draft Core Strategy document highlights a number of existing transport issues in the Earl's Court area:

- *"...the quality of the town centre [on Earl's Court Road] is shattered by the one-way south bound traffic, which forms part of the Earl's Court One-Way System (para 5.1.2);*
- *The One-Way System travels north up Warwick Road, and degrades the residential environment of that street (para 5.1.2);*
- *Cromwell Road also acts as a significant barrier to pedestrians (para 5.1.2);*
- *...using buses can be confusing because of the One-Way System (para 5.1.4);*
- *The One-Way System also makes for a poor pedestrian environment (para 5.1.4);*
- *There is at present no easy way to get from the Exhibition Centre to the Town Centre (para 5.1.6); and*
- *Air quality is a concern in the area due to pollution from traffic(para 5.8.1)"*

3.3.8 The document also sets out the aspirations and vision that RBKC has for the future development of the Earl's Court area. The key aspirations relating to transport are:

- *" unravelling the One-Way System (para 5.1.8);*
- *...reducing the traffic flow (para 5.1.8);*
- *...offering an attractive "urban-village" environment (para 5.1.8);*
- *...new good direct connection to the Exhibition Centre (para 5.1.8);*
- *Streetscape and pedestrian improvements to Cromwell Road...making it more pleasant for pedestrians and residents and marking the arrival of the A4 in Central London (para 5.1.8);*
- *Pedestrian movement across West Cromwell Road will be improved, particularly at the junction with Warwick Road (para 5.2.1);*
- *A new north-south link to the west of the railway line (para 5.2.1);*
- *...an improved public transport interchange between West Brompton station and Earl's Court station (para 5.2.2);*
- *... reduction and rationalisation of street clutter (para 5.7.1); and*
- *...support the reinstatement of two-way working and significant enhancements to the streetscape (para 5.7.2).*

LBHF ADOPTED POLICY

- UDP Policy G4 sets out the LBHF transport objectives as:



- development will be guided to locations that minimise the need to travel, and will be required to incorporate access arrangements that encourage the use of sustainable modes of travel and transport;
- the intensity of development will be related to accessibility by public transport, with new development expected to promote traffic restraint and reduction, so as to reduce congestion and air pollution and to avoid the need for increased road capacity;
- land use provision for improvements to the road network will only be made where necessary in the interests of traffic safety or maintaining the free flow of essential traffic;
- the siting, design and layout of development will be required to provide:
 - easy access by disabled people
 - safe, secure and direct access by pedestrians
 - facilities to encourage travel to and from the development by cycling and other sustainable modes of travel and transport.
- measures will also be sought, in connection with development proposals, to:
 - secure necessary improvements to, and development of, public transport systems and services, including additional stations on the West London Line;
 - ensure that road safety is not compromised and that the free flow of essential traffic is maintained;
 - minimise vehicle parking demand both by controlling the amount of on-street parking provision and by securing the introduction of complementary parking controls and traffic management measures to control off-site parking;
 - to promote the use of rail and water for freight transport;
 - protect residential areas and main shopping streets from the environmental impact of traffic generated by development proposals.

3.3.9 Policy TN8 defines a hierarchy of roads in LBHF and explains that developments will not be permitted if they hamper the ability of these roads to provide safe and effective access.

3.3.10 Policy TN13 notes that all developments will be assessed for their contribution to traffic generation and their impact on congestion.

3.3.11 Policy TN28 on freight movements, seeks to:

'Encourage and support the confinement of heavy lorries to suitable routes and their exclusion from unsuitable roads, other than for final access to premises.'

3.3.12 The justification to this policy recognises the importance of freight for the local economy, and the potential conflict with the quality of the local environment. The management of freight routes is seen as one way that this can be achieved.

LBHF DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.13 The Core Strategy Options document for the London Borough of Hammersmith and Fulham (LBHF) was put out to consultation on the 5th June 2009. This document makes reference to the following in the context of the Earl's Court area.

3.3.14 In Section 4, Issues Opportunities and Constraints:



- *...Earls Court...are major opportunity areas because they not only have substantial development potential but because they have very high existing public transport accessibility (para 4.104);*

3.3.15 In section 5, Spatial Vision:

- *... We will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment. Where we do not control the roads, for example the busy A4 and A40, we will have worked with our partners, particularly Transport for London to achieve these aims. We will also have worked with partners to improve transport in the borough, particularly north south links, as well as the opportunities for cycling and walking. Where there is major development we will have improved access, particularly for pedestrians and cyclists (para 5.17);*

3.3.16 In section 7, Key Spatial Options for Delivering the Council's Vision it is stated that:

- *The Council has a key objective to create decent neighbourhoods, regenerate town centres and the most deprived parts of the borough, particularly White City, West Kensington/Earls Court/North Fulham and Hammersmith and to reduce polarisation and worklessness to create more stable, mixed and balanced communities where people can live, work and prosper (para 7.3)*
- *We think the West London Line is capable of running services to a much higher level to help unlock regeneration potential(para 7.8)*

3.3.17 Within Section 8, consideration is given to the appropriate development type in the Earls Court Regeneration Area. Within this section it is stated that:

- *The area is highly accessible to public transport, being close to West Brompton Station which is on the District and West London Lines and to Earls Court Station, on the District and Piccadilly Lines. Although there is little spare capacity on these lines at peak times, some improvements will take place with the future plans of Transport for London. The highway network in the area is congested through the town centre (past the street market) and south of the A4. (para 8.95)*
- *Employment creation to more than replace the potential loss of the exhibition centre (para 8.111)*



4 Baseline Conditions

4.1 WALKING AND CYCLING

4.1.1 Transport policies at all levels encourage walking and cycling as being the most sustainable and low-impact modes of travel. PPG13 highlights the potential for walking to replace short car trips, especially for journeys under 2km. It also notes that cycling has the potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

WALKING

4.1.2 According to the Mayor of London's website, almost seven million walking journeys on foot are made in London every day and walking accounts for 80 percent of all trips under one mile. Walking is a cost effective, accessible, healthy and enjoyable form of travel, and is a compulsory element of any journey.

4.1.3 The Walking Plan for London – '*Making London a walkable city*' was published by the Mayor in February 2004 to promote walking. The Plan adopts the 'the 5 'Cs' from the London Planning Advisory Committee (LPAC) Walking Strategy for London as key indicators of walkability which are; Connected, Convivial, Conspicuous, Comfortable and Convenient.

4.1.4 The principal shortcomings in the Regeneration Area are the poor pedestrian environment along the A4 and the relative impermeability of the pedestrian network across the West London Line and through the privately-owned Earls Court and Olympia sites.

4.1.5 As there is no direct through route from the LBHF Site to the town centre, residents currently need to use the A4 West Cromwell Road to access Earls Court Road. For example, from Gibbs Green Close (part of the LBHF site) to the junction of Earls Court Road/Nevers Place; the crow fly distance is approximately 815m equivalent to a 10 minute walk whilst the distance walking along the accessible streets would be approximately 1.3 kilometres equivalent to a 16 minute walk

4.1.6 Warwick Road is a predominately residential street with the exception of the Exhibition Centre with good, well maintained and lit footways. Informal crossing points including tactile paving to facilitate north-south movement. There are signalised pedestrian crossings at its junction with the A4 West Cromwell Road and Old Brompton Road and between the tube station and Exhibition Centre. There is, however, a lack of crossing points at intermediate locations along the street which would facilitate crossing movements between the footways along either side.

4.1.7 The A4 is a significant barrier to pedestrian movement; a complicated multi-stage pedestrian crossing is provided at the A4 West Cromwell Road/Warwick Road junction to negotiate the multiple lanes of traffic on a very wide carriageway.

4.2 CYCLING

4.2.1 The London Cycle Network (LCN) is a network of signed routes for cyclists across the capital. Over 550km of the 900km network has been completed to date; final completion is due by the end of 2010. TfL are also investing in an off-road network of routes through London's parks, and along the capital's waterways.

4.2.2 There are some established LCN cycle routes of varying significance in the immediate vicinity. An existing signposted radial route runs along the southern edge of



the site (Lille Road) and a 'recommended' route lies off the north western edge of the area which connects across West Cromwell Road, towards Olympia. The LCN around the Regeneration Area is shown on the following plan.



Figure 3.1: London Cycle Network

4.2.3 However, the Regeneration Area is a notable gap in the existing cycle network in West London. The North End Road, Cromwell Road and the rail corridor present significant barriers to radial and orbital cycle journeys in the vicinity of the area, whilst the Exhibition Buildings and surrounding estate are impermeable to cycle movements across the zone. Consequently, there are no current proposals to improve the cycle network within the Regeneration Area.

4.3 PUBLIC TRANSPORT ACCESSIBILITY

4.3.1 Transport policies place an emphasis on the integration of land use, transport and planning decisions. In particular, the policies stress the need to create more sustainable patterns of development by delivering accessibility.

4.3.2 The accessibility of sites to public transport, particularly those located in London has, since the mid 1990s, been defined by reference to a Public Transport Accessibility Level (PTAL). This methodology identifies an index as a measure of accessibility. This index is expressed as a grade from 1 to 6 where 1 is the lowest and 6 the highest level of accessibility.

4.3.3 The area benefits from high accessibility (up to PTAL 6) with the exception of a PTAL 3 area in the centre of the Regeneration Area. This reduced accessibility arises



due to the lack of permeability across the area and the lack of public transport services currently entering the site due to existing infrastructure.

4.4 BUSES

4.4.1 The existing bus network is shown on Figure 3.2.

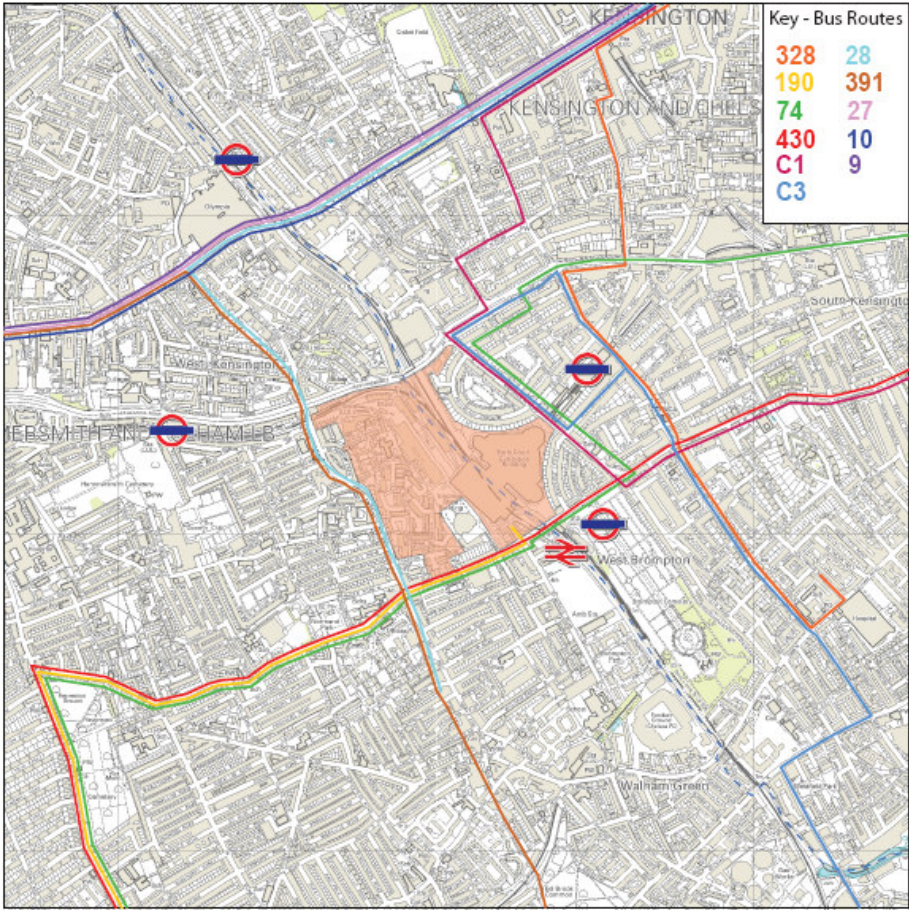


Figure 3.2: Bus Network

4.4.2 The Inner West London bus network was enhanced in late-2006 / early-2007 in order to complement the Western Extension Zone of the London congestion charge scheme. These improvements added a passenger capacity of more than 4,800 in the peak hour, demonstrating the relative ease with which the bus network can be enhanced in a short time scale

4.4.3 However, some bus improvement proposals were frustrated by a lack of bus priority measures and bus standing areas. In addition, the bus priority network around the Regeneration Area is under-developed, with only limited sections of bus lane on North End Road. The lack of bus priority means that services are vulnerable to delays caused by traffic congestion.

4.4.4 A further limitation of the Inner West London bus network is the lack of available land for bus interchanges and operational bus stands. The flexibility of the bus network entails that bus routes have often been established and extended on a “piecemeal” basis, with the result that the network can be fragmented.

4.4.5 For example, around the Regeneration Area there are bus stands:

- between the Empress State Building and Earls Court 2 for the 190 route only;



- at the Warwick Road / West Cromwell Road Tesco for the C3 only;
- at World's End, Chelsea for the 328 only;
- at Notting Hill Gate for the 390 only; and
- near Craven Cottage for the 424 only.

4.4.6 The standard of bus / rail / Underground is also generally poor at the surrounding West Brompton, Earls Court, West Kensington and Kensington Olympia stations.

4.5 RAIL

4.5.1 Rail connections around the Regeneration Area are extensive and provide important links at all geographic scales (local, metropolitan, regional and national) to accommodate increased patronage and are likely to be a main mode of travel for residents, workers and visitors alike.

4.5.2 Understanding the railway services and the connections they offer is key to understanding the way people will access the site in the future. In order to do this Halcrow undertook service analysis at the following stations:

- West Brompton,
- Earls Court,
- West Kensington,
- Kensington Olympia

4.5.3 The following is a list of projects which are likely to feature and have an effect on this project:

- West Coast Main Line timetable change – December 2008/9
- LOROL Service Level 2 timetable (4 trains per hour between Clapham and Willesden/Stratford)
- Interchange with Central Line at White City
- Capacity Improvements on the Piccadilly and District lines
- Southern RUS comments on Gatwick - Watford service and any changes likely to be implemented during the life of the Southern franchise
- LOROL orbital service (2011 for East London Line and later for links to South London)
- Shepherds Bush interchange
- Cross London RUS

4.5.4 On Network Rail, the main constraint to capacity is likely to be the frequency of services on lines that adjoin the West London Line. At the north end of the West London Line (WLL) there are junctions with the North London Line, the Great Western main line (via the South West Sidings route) and the West Coast Main Line (WCML) all of which are heavily used by freight and passenger services. To the south there are two routes to Clapham Junction, a disused route to Waterloo, a route to Victoria via the Battersea reversible line and to the South Eastern network via Factory Junction.

4.5.5 Plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. PPP upgrades due by 2017 are planned for the eastbound Piccadilly and District Lines, as well as the portion of the District Line



between West Brompton and Earl's Court stations, bringing significant relief to each. Providing a new option for those travelling east / west, Crossrail will also assist in further reducing congestion by diverting passengers from the Underground routes in that direction.

4.6 HIGHWAY NETWORK

4.6.1 The Regeneration Area is bounded by the A4 Talgarth Road / West Cromwell Road (to the north), Warwick Road (to the east), North End Road (to the west) and Lillie Road / Old Brompton Road (to the south).

4.6.2 The highway network designations are highlighted on the plan below.

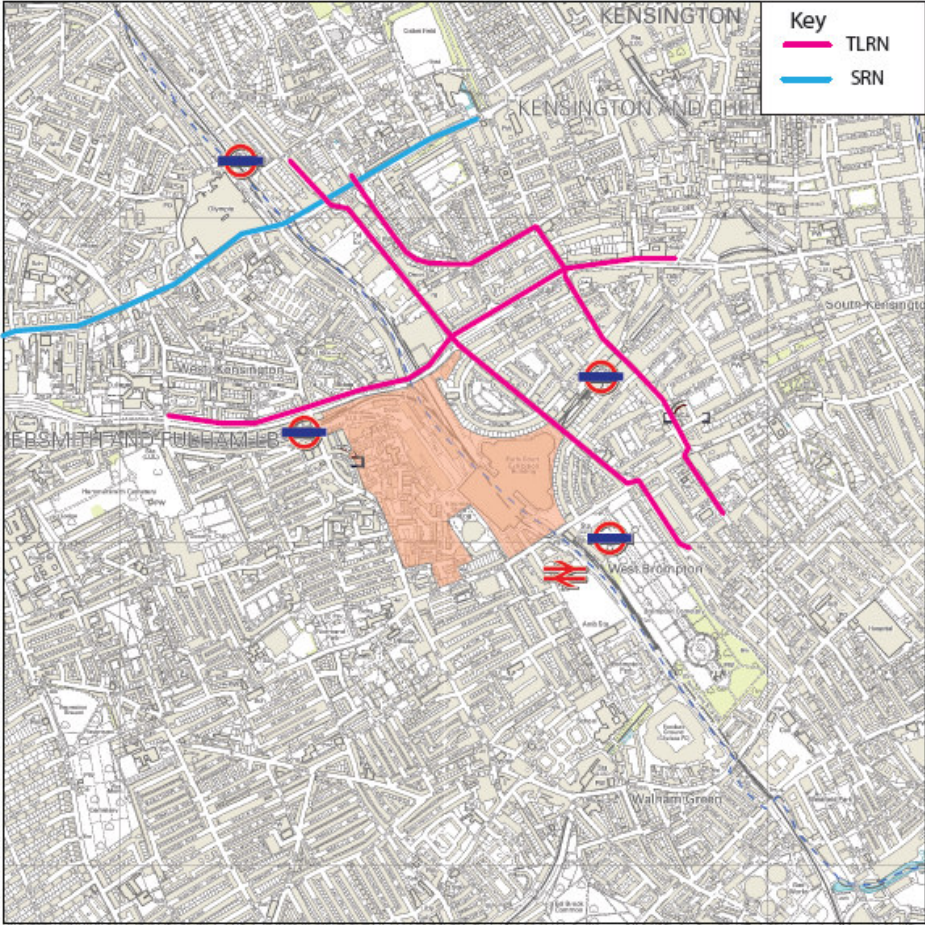


Figure 3.3: Highway Designations

4.6.3 The A4 Talgarth Road / West Cromwell Road and the Warwick Road / Earls Court Road one-way pair all form part of the Transport for London Road Network (TLRN), and the A315 Hammersmith Road / Kensington High Street is part of the Strategic Road Network (SRN).

4.6.4 Weight restrictions are in place on some railway bridges. To the north at Hammersmith Road railway bridge is a 12 tonne restriction. To the south at Fulham Road is a 7.5 tonne restriction. No weight restrictions apply to West Cromwell Road railway bridge. Sections of Lillie Road and the A219 Fulham Palace Road are also subject to a width restriction of 2.1m.

EXISTING TRAFFIC FLOWS



4.6.5 The latest traffic flow information for the AM and PM peaks is presented on the following images, which are based on post-extension survey data gathered by WSP in 2007 and 2008. The traffic surveys were all undertaken during periods when no event was in progress at Earls Court.

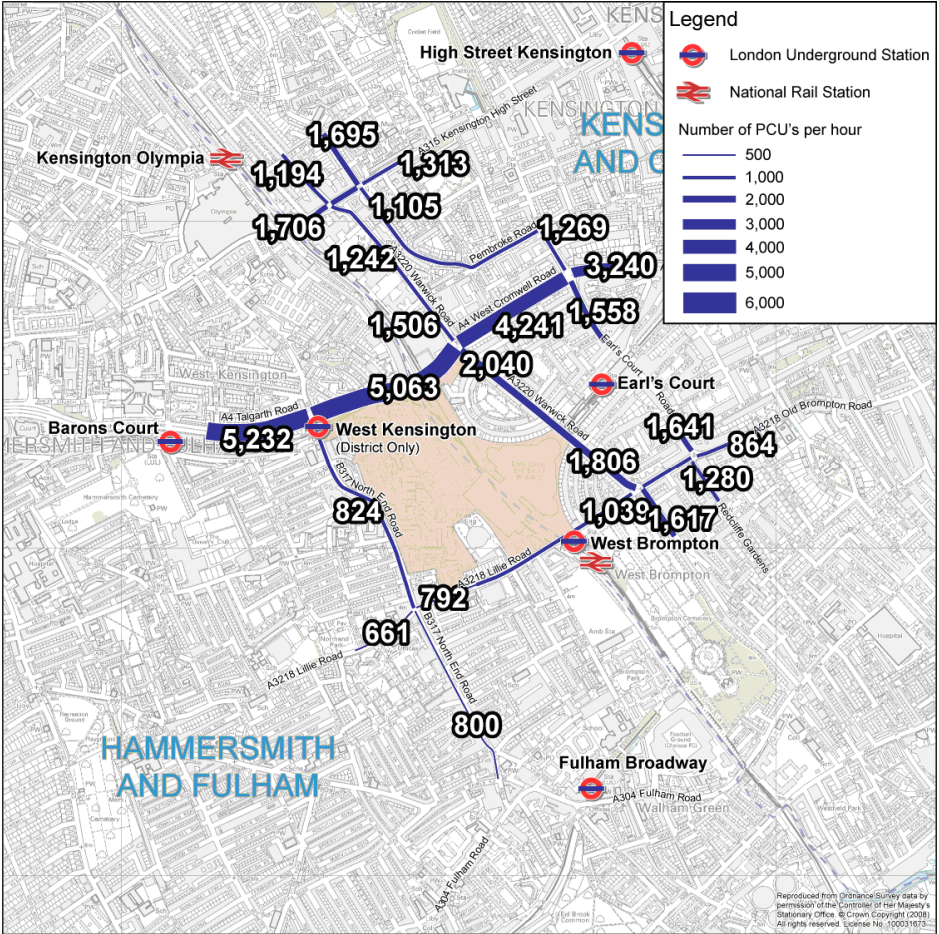


Figure 3.4: AM Peak Hour Traffic Flows (two-way totals)

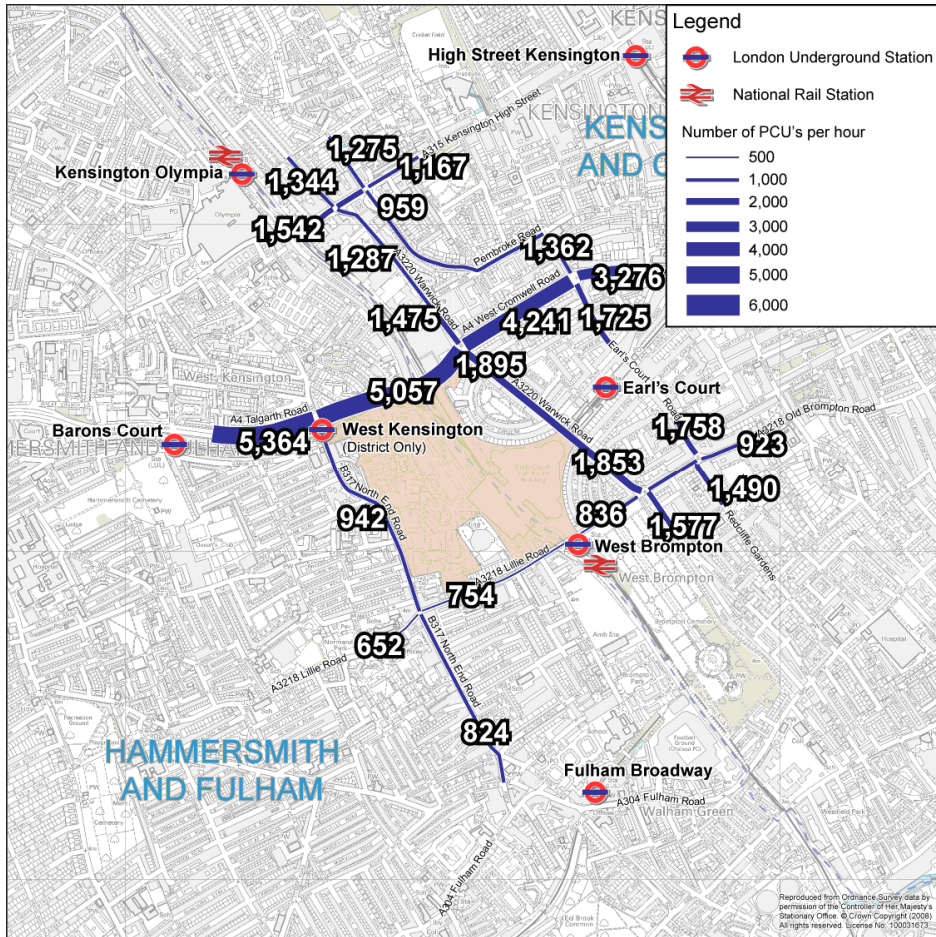


Figure 3.5: PM Peak Hour Traffic Flows (two-way totals)

4.6.6 These Figures show that the dominant movement through the area is east-west through traffic, followed in magnitude by the north-south through traffic. The detail of the individual junction turning movement surveys also shows there is a substantial west-south through movement from the A4, turning right onto Earls Court Road and then continuing south on Redcliffe Gardens. The reverse movement from Finborough Road north to Warwick Road and then turning left onto the A4 westbound is also a dominant movement (half of the Warwick Road traffic approaching the A4 subsequently turns left onto the A4).

EXISTING TRAFFIC GENERATION

4.6.7 The existing traffic movements which are generated by the current uses of the Regeneration Area have been surveyed.

4.6.8 The existing Earls Court exhibition centre traffic movements have been studied in detail with extensive analyses of the exhibition centre servicing and commercial vehicle marshalling procedures. It was found that the existing traffic generation is subject to considerable variation, depending on the events taking place at Earls Court at any one time.

4.6.9 The existing traffic generation therefore varies from a minimum of some 400 vehicles per hour up to around 1000 vehicles per hour. Much of the peak traffic is composed of van and lorry-sized delivery vehicles associated with the build-up and break-down of exhibition events.



EXISTING HIGHWAY CAPACITY

4.6.10 WSP has carried out junction capacity modelling of the key junctions on the local highway network. This initial feasibility exercise has demonstrated areas where there is existing highway capacity, and other areas with scope for improvements. Further junction capacity modelling will be carried out independently by TfL.

4.7 SUMMARY

4.7.1 The Regeneration Area benefits from a high level of public transport accessibility across the majority of the area. The principal shortcoming in the Regeneration Area at the moment is the lack of internal connectivity for all modes of travel for the types and intensity of uses contemplated through redevelopment. The dominance of the road network and presence of railway lines reduce pedestrian connectivity in certain areas. The bus priority network and London Cycle Network is also sparse within the vicinity of the Regeneration Area. The Regeneration Area transport strategy will consider opportunities for addressing these issues in collaboration with relevant local authorities and key stakeholders and is discussed further in Section 5 of this study.



5 Transport Impact

5.1 TRAVEL DEMAND ASSESSMENT

5.1.1 A travel demand forecast has been calculated from the indicative land use budget summarised below.

Table 4.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

5.1.2 Each element of the indicative land use budget has been discussed with the relevant specialist in the Capital & Counties team to ensure that the travel demand assessment is an accurate reflection of the specific forms of development which could come forward in each land use category.

5.1.3 The forecasting exercise has referred to the following information sources and is based on:

- TfL's TRAVL database information;
- trip generation estimates by mode, using data which has been accepted by RBKC, LBHF and TfL recently in respect of other nearby development proposals
- Census Output Area data for nearby locations
- The sustainable transport strategy which is being developed for the Regeneration Area.

5.1.4 Based on these preliminary studies, the total travel demand for the proposed residential, office, hotel and retail uses is likely to be in the region of 20,000 and 19,000 two way person trips in the AM peak and PM peak hours respectively. The modal share for these trips would reflect the accessibility of the area:

- It is predicted that approximately 70% of journeys will be by public transport modes;
- Walking would be the next most significant mode of travel accounting for approximately 16% of journeys (main mode);
- Car driver trips would be minimal accounting for approximately 3% of journeys.

5.1.5 It should be noted that the mix of complementary land uses within the indicative land use budget will reduce the need to travel by providing shopping, and leisure opportunities and social/ community facilities within walking distance of residents living in the area.



5.2 PEDESTRIANS

5.2.1 The land use budget would generate large pedestrian flows, which mostly arise due to people walking between the nearby Earls Court, West Brompton and West Kensington stations and the Regeneration Area.

5.2.2 The key areas to be addressed will be the possible upgrading of station access capacity to cater for these additional pedestrian flows and the provision of high-quality and high-capacity crossing points on pedestrian desire lines which cross busy roads.

5.2.3 The change in pedestrian flows in the wider area beyond the stations will be less significant, but will need to be studied in detail to ensure a satisfactory level of service and upgrading where required.

5.3 CYCLING

5.3.1 The potential demand would result in a large increase above existing cycle flows in the area. This creates a need for high-quality cyclist facilities within the Regeneration Area, including cycle parking, cycle lanes and showering / changing facilities throughout the proposed land uses.

5.3.2 The uplift in cycling demand is such that the off-site cycling network will need to be upgraded in order to provide safe and attractive routes.

5.4 BUSES

5.4.1 Bus demand would also increase significantly, thus generating a need for bus service improvements to add capacity to the network and for on-site and off-site bus priority and other infrastructure to improve the attractiveness of bus travel.

5.4.2 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider – local and metropolitan – transport network and to providing sustainable transport options.

5.4.3 On-site facilities should include modern bus interchanges which link with the tube and train stations to improve the integration of public transport journeys, plus dedicated on-site bus lanes to improve journey times and the reliability of bus journeys relative to car travel. These should be considered alongside bus improvements to the surrounding area.

5.5 RAIL

5.5.1 As discussed in Section 3.5, a number of plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. Collectively these improvements create the significant new rail capacities necessary to ensure the full redevelopment of the Regeneration Area given its central location and proposed future as a sustainable mixed use district and can accommodate, with some modifications, the movement demands anticipated.

5.5.2 Specific improvements over and above those already contemplated under the PPP and Crossrail initiatives may be required in the AM peak inbound to add service to the West London line and to relieve inbound congestion on the District Line from Putney. Halcrow has developed a number of supporting plans and new base timetable that will allow increased demand to be catered for.

5.6 HIGHWAY NETWORK

5.6.1 The potential net impact on the highway network has been forecast within a range, which depends on whether it is compared against an existing event taking place



at Earls Court Exhibition Centre, or whether it is considered against the situation where Earls Court Exhibition Centre is not in use.

5.6.2 For the existing situation where a large event takes place at Earls Court Exhibition Centre, the forecast shows an overall 2% reduction in traffic on the surrounding road network. This is due to the high traffic generation of existing Earls Court Exhibition Centre shows, especially for the build-up and break-down periods where high volumes of large exhibitors' vehicles access the EC 1+ 2 site. The indicative land use budget would generate less traffic than the existing large Earls Court Exhibition Centre events.

5.6.3 When the comparison is based on a scenario where there is no event at Earls Court Exhibition Centre, the outcome is a 2% increase in traffic across the surrounding road network. There is scope for this level of traffic impact to be accommodated, subject to highway capacity improvements, traffic signal re-timing and better traffic management.

5.7 SUMMARY

5.7.1 The indicative land use budget is anticipated to result in approximately 20,000 and 18,700 two way person trips in the AM and PM peak hours respectively. The increased demand resulting from the indicative land use budget could be accommodated through infrastructure improvements across the local transport network.



6 Transport Strategy

6.1 OVERVIEW

6.1.1 The high-level objectives of the Regeneration Area sustainable transport strategy are:

- to mitigate existing transport problems;
- increase accessibility across the area; and
- to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings.

6.1.2 Possible measures to deliver the high level objectives listed above are discussed in detail below. These measures would contribute to both RBKC's and LBHF's aspirations for the development of the Earl's Court area as set out in Section 3.4.

6.1.3 Underpinning the transport strategy is the concept of complementary land uses which have the potential to achieve the PPG13 aims of promoting mixed use development in city, town and district centres, and near to major public transport interchanges in order to achieve vitality and diversity and promote walking as a primary mode of travel.

6.1.4 The proposed transport measures will perform best if they are implemented and managed in an integrated manner, and their effects monitored and reviewed as the development progresses.

6.1.5 The transport strategy will be designed to deliver the long term governance of the transport proposals, maximising their effectiveness in relation to the proposed land uses and the surrounding area, incentivising the achievement of sustainable travel patterns, and delivering the transport outcomes required for the development. The transport strategy will be discussed extensively with TfL, the Boroughs and other stakeholders.

6.2 WALKING & CYCLING

6.2.1 It is recognised that physical aspects of new development will influence travel patterns and can reduce dependence upon the private car. An integral part of promoting sustainable travel will therefore be the design of the development which should prioritise cyclists and pedestrians.

6.2.2 A network of connections could link roads, pedestrian connections and pathways leading to important destinations, such as the Underground stations, major public open spaces and shopping, and connect the area to adjacent neighbourhoods. Extensions to the London Cycling Network should be an integral feature of this network. The design of the overall network should provide a hierarchy of connections, the logic of which can easily be understood by residents as well as visitors. The elements of the network (roads, pathways, etc) should provide sufficient space and a public realm to ensure a comfortable walking or cycling experience. The routes should be well-maintained and legible with lighting, signage and the use of quality materials.

6.2.3 Additional measures that could be considered include:

- Cycle parking in excess of planning standards;



- A bike zone, with public cycle hire and maintenance facilities; and
- Electric charging points for powered cycles, based on renewable energy sources such as solar.

6.2.4 In February 2008, the Mayor announced a new programme aimed at achieving a growth in cycling of 400 percent by 2025. This would mean that five percent of all trips in London were made by bike. The three strands of the programme are:

- Bike hire in central London, providing a new public transport mode for short business and visitor trips;
- Cycling corridors, offering commuters with high profile, clearly signed priority routes from inner to central London; and
- Bike Zones, covering a radius of about 5km around London's town centres, incorporating 20mph speed limits, cycle priority streets, greenways and a network of cycle-friendly routes to link schools, stations, residential areas and workplaces, supported by cycle training, parking and travel planning.

6.2.5 The location and land use patterns in the Regeneration Area have potential to benefit from the proposed cycling corridors and Bike Zones.

6.3 BUSES

6.3.1 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider transport network and to providing sustainable transport options. The following initiatives should be further explored as ways of achieving these objectives:

- Create / improve interchange between buses, rail and underground at West Brompton, Earls Court and West Kensington;
- Create a new on-site bus interchange and extend the surrounding bus routes into the site;
- Create through-routes for buses, with on-site bus priority;
- Propose off-site bus priority and infrastructure improvements;
- Increase the frequency of existing bus services; and
- Propose bus links to key locations and areas which lack a tube or rail connection, such as the Kings Road area and other poorly-served areas of both Boroughs.

6.4 RAIL

6.4.1 Halcrow has undertaken extensive work to consider a number of alternative measures that could be delivered to avoid any potential hotspots on the network and improve capacity on the West London Line (WLL), including the possible introduction of a new base timetable to accommodate the increased demand.

6.4.2 A preferred option would be providing additional services from Clapham Junction to Shepherd's Bush, turning around at North Pole Depot with an extension to Watford to offer a frequent service on the WLL and additional hourly connection with the West Coast Main Line.

6.5 HIGHWAY NETWORK

6.5.1 The proposals will seek to contribute to the aspirations that both RBKC and LBHF has for the area by providing strategic benefits for the highway network through its design. The specific alignments and connectivity of any future road system would be



dependent on the character of the redevelopment; however the following measures would be considered:

- Assessment of any contribution (as required and related to the development) to the tackling the Earls Court One-Way system;
- Provide a north/ south route through the Regeneration Area, which has the capacity to relieve through traffic from both directions of the Earls Court One-Way system. Initial assessments have indicated that the level of relief could be sufficient to achieve :
 - reduced traffic impact
 - improved local air quality
 - reduced community severance
 - improved pedestrian and cyclist conditions
 - improved bus facilities
 - better on-street loading and parking for local businesses;

This concept would need to be assessed in further detail and its implementation would be dependent on extensive consultation and the progress of statutory procedures. The phasing of its delivery relative to other elements of the Regeneration Area would need to be considered carefully

- Improvements to the A4 / North End Road junction to provide an opportunity to improve bus/tube interchange at West Kensington station and increase capacity where possible for north-south traffic and for movements into the area;
- Reduce impact on local roads by providing direct access from the A4;
- Locate accesses at existing points (e.g. the Earls Court, West Brompton and Lillie Road forecourts) and at existing side roads from North End Road which have potential to be connected into the area;
- Provide a separate service road under raised parts of the development. There are potential alignments that could follow the main north / south track corridor; one could run north from Lillie Road at the bridge location to the west of the tracks. Further detailed studies would be undertaken in association with a specific development proposal to determine the alignments and design of these routes;
- Consider the potential for an Urban Consolidation Centre (UCC) to reduce service vehicle movements in the area, with on-site electric-powered vehicles to distribute goods around the Regeneration Area with zero carbon impact.
- Develop Travel Demand Management (TDM) measures in liaison with the project partners and planning authorities, such as:
 - Potentially promoting low-emission Car Clubs on the sites
 - encouraging public transport, walking and cycling
 - adopting parking ratios below the maximum standards, and controlling off-site parking impacts
 - implementing Travel Plans for the residential and commercial uses
 - personalised travel planning;
- Promote a Low Emission Strategy, in line with the Beacon Councils Air Quality Group recommendations (RBKC is a member of this Group); and



-
- Examine the potential for electric car charging stations based on renewable energy sources such as solar.

6.6 SUMMARY

6.6.1 The transport strategy for the Regeneration Area will contain a package of measures to encourage local travel and travel by sustainable modes. The developer will work with local stakeholders and local authorities in preparing and implementing the strategy as a masterplan for the Regeneration Area progresses. Measures that could potentially be included in the strategy have been considered above. However, the specific measures will be dependent on the character of the redevelopment with due consideration to the Borough’s aspirations for the area.

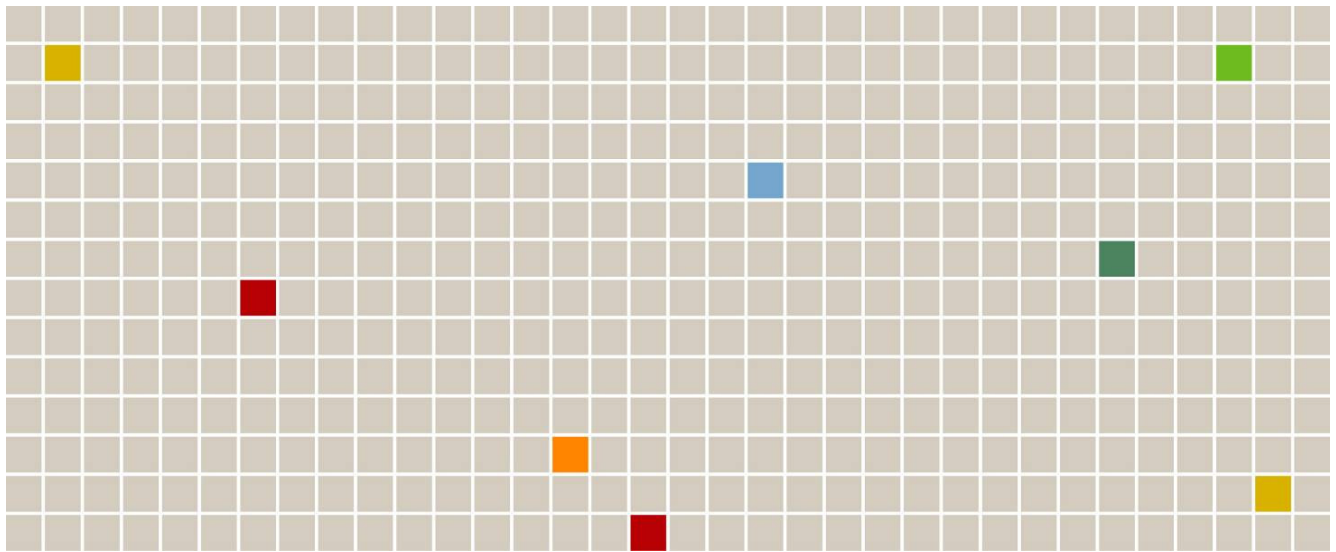


7 Conclusions

7.1.1 This Summary Transport Study is a technical evidence base document which supports the Earls Court Regeneration Area. The study has considered the transport implications of an indicative land use budget for the Regeneration Area.

7.1.2 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

7.1.3 The provision of additional transport infrastructure to support the Regeneration Area would be complemented by a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and minimise car dependency, in line with national, regional and local policy aims. These measures have the potential to improve a number of existing transport issues in RBKC and LBHF and will be developed as a Masterplan for the Regeneration Area evolves.



Earls Court Regeneration Area Core Strategy Evidence Base Summary Transport Study

Capital & Counties on behalf of Earls Court and
Olympia Group

June 2009





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1 Executive Summary

1.1.1 This technical report provides evidence in support of the Earls Court Regeneration Area in relation to transport matters.

1.1.2 The Earls Court Regeneration Area covers 27 hectares and comprising:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

1.1.3 The indicative land use budgets assessed in this report are based on 1,380,000 to 1,640,000 sq m of development comprising a comprehensive mix of complimentary land uses to provide a sustainable community for the area.

1.1.4 The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study would therefore be subject to further review as any development proposals progress.

1.1.5 Most of the Regeneration Area benefits from a high level of public transport accessibility and there is scope to improve this further. Regeneration of this area is in line with planning policies that seek to locate major new developments in proximity to transport infrastructure. The transport implications of the indicative land use budget have been assessed and are reflected in the transport strategy considered in this study.

1.1.6 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

1.1.7 The transport strategy will include a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and reduce car dependency, in line with national, regional and local policy aims. The proposals support the Borough’s aspirations for the area and will provide strategic benefits to the transport network by helping to tackle a number of existing issues which have been identified in the draft Core Strategy.

1.1.8 The transport strategy aims to mitigate existing transport problems, increase accessibility across the Regeneration Area and to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings. Subject to the outcome of the core strategy consultation, it is the intention to develop the transport strategy in close liaison with RBKC, LBHF, TfL and other stakeholders as the Core Strategy and the masterplanning process move forward.

1.1.9 Based on the indicative land use budget, the development proposals are anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. The increased demand resulting could be accommodated through infrastructure improvements across the local transport network.

1.1.10 The indicative land use budget would generate less traffic than existing large Earls Court Exhibition Centre events

2 Introduction

2.1 SCOPE OF STUDY

2.1.1 WSP and Halcrow have been appointed to advise Capital and Counties on behalf of the Earls Court and Olympia Group on the transport aspects of a potential redevelopment of the Earls Court Regeneration Area. This study forms part of the evidence base for the Regeneration Areas. The Regeneration Area comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.2 The summary study considers the transport implications of a potential development scenario on the transport infrastructure in the vicinity of the Earls Court Regeneration Area, which covers 27 hectares and comprises:

- the Earls Court exhibition centre (“the EC1+2 Site”);
- the adjacent London Borough of Hammersmith and Fulham (LBHF) Gibbs Green and West Kensington housing estates (“the LBHF Site”); and
- the Transport for London (TfL) Lillie Bridge Depot site (“the LBD Site”).

2.1.3 For the purpose of the technical analyses in this study, an indicative land use budget of 1,380,000 to 1,640,000 sq m has been assumed for the Regeneration Area. The breakdown of this overall total is provided in Table 1.1. The indicative areas used in the technical analysis for this study are preliminary figures, based on the indicative land use budget. The findings of this study will therefore be subject to further review as masterplanning and any development proposals progress

Table 1.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

2.2 REPORT STRUCTURE

2.2.1 This study provides an initial technical briefing, which will in due course inform any future masterplanning process. It sets out the potential transport issues, constraints and opportunities for the Regeneration Area drawing on work undertaken to date and the findings of preliminary studies of the existing situation. It also provides suggestions for the development of a sustainable transport strategy to build on the significant potential of the area to deliver a highly sustainable development. The remainder of the study is set out as follows:



-
- Section 1 is an Executive Summary
 - Section 2 is an Introduction to the context of the summary study
 - Section 3 provides an overview of relevant transport policy in relation to the site;
 - Section 4 reviews the existing transport infrastructure in the vicinity of the site;
 - Section 5 considers the potential transport impacts based on the indicative land use budgets;
 - Section 6 discusses the potential Regeneration Area transport strategy; and
 - Section 7 concludes and summarises the findings of this study.



3 Policy Overview

3.1 NATIONAL

3.1.1 The Government's over-arching strategy is set out in Planning Policy Guidance Note 13 (PPG13), which emphasises the key themes of sustainable development. The document reinforces the message that there must be greater integration of planning and transport in order to promote more sustainable transport choices and reduce the need to travel, especially by private car.

3.1.2 The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices and to promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling. It therefore advocates:

- actively managing the pattern of urban growth to make the fullest use of public transport;
- increased intensity of development at locations which are highly accessible by public transport, walking and cycling;
- reducing the amount of parking in new developments, as part of a package of planning and transport measures to promote sustainable travel choices;
- promoting mixed use development, which can provide very significant benefits in terms of vitality and diversity and in promoting walking as a primary mode of travel;
- producing a broad balance at the strategic level between employment and housing, to minimise the need for long distance commuting;
- focussing mixed use development involving large amounts of employment, shopping, leisure and services in city, town and district centres, and near to major public transport interchanges (see paragraph 20); and
- encouraging a mix of land uses, including housing, in town, suburban and local centres.

3.2 REGIONAL

THE LONDON PLAN (CONSOLIDATED WITH ALTERATIONS SINCE 2004)

3.2.1 The Plan sets out policies to help London manage significant growth in London's population and jobs. In terms of transport and development, the key themes are:

- encouraging proposals for large residential developments in areas of high public transport accessibility, including the provision of suitable non-residential uses within such schemes;
- encouraging patterns and forms of development that reduce the need to travel especially by car;
- seeking to improve public transport capacity and accessibility where it is needed;
- supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity; and



- ensuring that on-site car parking at new developments is the minimum necessary, with no over-provision that could undermine the use of more sustainable non-car modes.

A NEW PLAN FOR LONDON (APRIL 2009)

3.2.2 In July 2008 a consultation document 'Planning for a Better London' was published outlining the approach that was proposed to the revision of the London Plan. The next stage of this review is the publication of 'A New Plan for London'. It is intended that the new London Plan would be completed in around four years, with various supplementary planning documents being issued in the meantime.

3.2.3 Pages 61 to 65 of A New Plan for London discuss policy considerations related to London's Transport networks. It states the following objective;

- *A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan.*

3.2.4 Reference is also made to a co-ordinated approach to land use and transport planning stating:

- *Close co-ordination of the provision of transport infrastructure and services with land use development is essential to support London's continued development and growth. Good public transport access will not in itself guarantee development but it is a necessary condition for a successful city – one in which everyone has easy, safe and convenient access to jobs, opportunities and facilities.*

3.2.5 There is also an emphasis on delivering reduced congestion within London's streets and providing environments suitable for all users It states:

- *London's streets perform a variety of functions – they should provide a safe and pleasant means of travelling on foot, by cycle, bus or car; and act as a network of attractive public spaces in which people can interact. The new Plan will emphasise facilitating essential access for people, goods and services, and give strong support for cycling, walking and taking the bus – in town centres, other parts of Outer London and across central London.*

3.2.6 Page 64 states that in reviewing the London Plan the Mayor proposes to:

- *Develop a new, criteria based, approach to road schemes which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve;*
- *Tackle congestion and traffic reduction, including investigating road user charging in the future;*
- *Allocate street space in line with MTS priorities, including shared space, where appropriate, (taking account of the safety of all pedestrians, particularly visually impaired people); improve conditions for buses; and investigate coach hubs;*
- *Substantially strengthen policy on walking and support the "Legible London" initiative;*
- *Put in place strong policies supporting cycling, with reference to the Velib cycle rental scheme and cycling superhighways;*
- *Develop new cycle parking standards; and*
- *Strengthen policy on public realm enhancements.*



THE MAYOR'S TRANSPORT STRATEGY 2001

3.2.7 This document supports the Mayor's vision of London as an exemplary sustainable world city. The Transport Strategy aims to increase the capacity, reliability, efficiency, quality and integration of London's transport system to provide the world class transport system the capital needs. The ten key transport priorities which flow from this are:

- reducing traffic congestion;
- overcoming the backlog of investment in the Underground so as to safely increase capacity, reduce overcrowding, and increase both reliability and frequency of services;
- making radical improvements to bus services across London, including increasing the bus system's capacity, improving reliability and increasing the frequency of services;
- better integration of the National Rail system with London's other transport systems to facilitate commuting, reduce overcrowding, increase safety and move towards a London wide, high frequency 'turn up and go' Metro service;
- increasing the overall capacity of London's transport system by promoting: major new cross-London rail links including improving access to international transport facilities; improved orbital rail links in inner London; and new Thames river crossings in east London;
- improving journey time reliability for car users, which will particularly benefit outer London where car use dominates, whilst reducing car dependency by increasing travel choice;
- supporting local transport initiatives, including improved access to town centres and regeneration areas, walking and cycling schemes, Safer Routes to School, road safety improvements, better maintenance of roads and bridges, and improved co-ordination of streetworks;
- making the distribution of goods and services in London more reliable, sustainable and efficient, whilst minimising negative environmental impacts;
- improving the accessibility of London's transport system so that everyone, regardless of disability, can enjoy the benefits of living in, working in and visiting the Capital, thus improving social inclusion; and
- bringing forward new integration initiatives to: provide integrated, simple and affordable public transport fares; improve key interchanges; enhance safety and security across all means of travel; ensure that taxis and private hire vehicles are improved and fully incorporated into London's transport system; and provide much better information and waiting environment.

MAYOR'S TRANSPORT STRATEGY – STATEMENT OF INTENT (MAY 2009)

3.2.8 A new transport strategy is currently under consultation with the London Assembly and GLA Group, prior to a full draft which will be subject to public consultation in Autumn 2009. Publication of the final new strategy is scheduled for early 2010.



3.2.9 The draft principles are largely in line with the current Transport Strategy, but with more emphasis on the transport needs and viability of Greater London as a whole rather than focusing on Central London. Key themes include: ensuring a lasting transport legacy at the Olympic and Paralympics Games venues including Earls Court; improving transport opportunities with significant investment in public transport, walking, cycling; and tackling climate change through measures, such as, ensuring at least 20 percent of parking spaces in new developments have charging points for electric vehicles.

3.2.10 The existing proposals largely relate to the projects and proposals already committed to in TfL's nine-year Business Plan. In addition, they also include those improvements to the National Rail network to be delivered by Network Rail and the Government up to 2014, as part of the current High Level Output Specification Control Period 4 funding package, and by other major agencies (e.g. BAA and the Highways Agency) delivering transport improvements impacting on London.

3.2.11 The document also confirms the Mayor's intention to remove the Western Extension Zone (WEZ) of the Congestion Charging zone, following a non-statutory consultation with the public and stakeholders. In the future, wider road user charging may be explored in the context of a national scheme and charging in town centres may also be considered. Other measures, such as, upgrading signal control junctions, improving the management of roadworks and road enhancements will be used to mitigate the effects of the removal of the WEZ.

LONDON FREIGHT PLAN (OCTOBER 2007)

3.2.12 The London Freight Plan sets out the steps that should be taken over the next five to ten years to identify and begin to address the challenge of delivering freight sustainably in London.

3.2.13 The Plan has no statutory force, but has been developed to implement the Mayor's Transport Strategy, and is a material consideration for planning. The same principles underpin the Mayor's Transport Strategy.

3.2.14 The specific policy aims are to:

- Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing in order to support London's economy;
- Minimise the adverse environmental impact of freight transport and servicing in London;
- Minimise the impact of congestion on the carriage of goods and provision of servicing and;
- Foster a progressive shift of freight from road to more sustainable modes such as rail and water, where this is economical and practicable.

3.3 LOCAL

RBKC ADOPTED POLICY

3.3.1 The 2002 Unitary Development Plan (UDP) recognises that many of the transport-related issues affecting RBKC need to be viewed and resolved in a London-wide context, as well as reflecting residents' interests. It also acknowledges that solutions to many transport challenges require a coordinated, strategic approach by government and its agencies, transport authorities and transport providers and operators.



3.3.2 It proposes an effective transport system that is integrated with land-use planning and is based on patterns of land-use which reduce the need to travel and promote the use of public transport, walking and cycling as alternatives to the private car.

3.3.3 RBKC has formulated eight principal strategic policies within the former UDP. In the revised UDP, the number of principal strategic policies has reduced to three and those relating to transport issues are:

- STRAT 5: To ensure that further visitor related development locates in places that are well served by public transport and does not harm the residential character or amenity of the Borough.
- STRAT 7: To promote sustainable development through locating high trip generating uses in areas which are or will be well served by public transport and by encouraging the local provision of services and facilities to reduce the need to travel.

3.3.4 RBKC has adopted the following objectives for transport in the Borough:

- locate high trip-generating activity in areas well served by public transport;
- improve access to all land uses, especially for those with special mobility needs through the efficient use of the transport network;
- reduce the need to travel and, in particular, the number and length of motor vehicle trips by ensuring that development is located appropriately;
- promote measures to reduce the need to travel;
- reduce overall levels of road traffic in the Borough;
- reduce air pollution from road traffic and the noise nuisance caused by transport;
- increase the proportion of journeys made on foot and by bicycle;
- improve public transport so it is more convenient and reliable to use, is better able to meet demand and is attractive as an alternative to the private car;
- reduce the number and severity of road accident casualties;
- minimise the adverse effects of traffic in the Borough, particularly on the environment of residential areas and shopping centres;
- ensure that development does not add to on-street parking stress, in particular where demand is already saturated; and
- ensure that changes to the transport infrastructure improve the Borough's townscape.


3.3.5 These objectives are reflected in strategic transport policies STRAT 25, STRAT 26, STRAT 29 and STRAT 35.

3.3.6 Policy TR28 states that RBKC will:

“resist any highway proposal which would lead to an increase in the overall traffic capacity of the Borough's Road Network.

Consideration may be given to limited additional highway provision where there will be no overall opportunity to increase the volume of traffic passing through the Borough. Actual proposals are likely to be limited but where proposals are advanced, complementary traffic management schemes will be designed to limit the possibility of adding to traffic volumes.

The Council, however, has supported, for a long time, road proposals that could provide some relief to the Earls Court one-way system. This support should also extend to



signage changes to re-route long distance traffic from these roads, which are linked with the Council's desire to see the Earl's Court One-Way System and the Embankment removed from London's Strategic Road Network. The Council supports means of improving the access to Earls Court Exhibition Centre, in order to reduce the number of commercial vehicles and coaches from the residential areas around Earls Court. The Council has supported an access road for lorries running north of the Centre, alongside the West London Line and beneath the West Cromwell Road, linking with Warwick Road."

RBKC DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.7 Section 5 of the "Places" draft Core Strategy document highlights a number of existing transport issues in the Earl's Court area:

- *"...the quality of the town centre [on Earl's Court Road] is shattered by the one-way south bound traffic, which forms part of the Earl's Court One-Way System (para 5.1.2);*
- *The One-Way System travels north up Warwick Road, and degrades the residential environment of that street (para 5.1.2);*
- *Cromwell Road also acts as a significant barrier to pedestrians (para 5.1.2);*
- *...using buses can be confusing because of the One-Way System (para 5.1.4);*
- *The One-Way System also makes for a poor pedestrian environment (para 5.1.4);*
- *There is at present no easy way to get from the Exhibition Centre to the Town Centre (para 5.1.6); and*
- *Air quality is a concern in the area due to pollution from traffic(para 5.8.1)"*

3.3.8 The document also sets out the aspirations and vision that RBKC has for the future development of the Earl's Court area. The key aspirations relating to transport are:

- *" unravelling the One-Way System (para 5.1.8);*
- *...reducing the traffic flow (para 5.1.8);*
- *...offering an attractive "urban-village" environment (para 5.1.8);*
- *...new good direct connection to the Exhibition Centre (para 5.1.8);*
- *Streetscape and pedestrian improvements to Cromwell Road...making it more pleasant for pedestrians and residents and marking the arrival of the A4 in Central London (para 5.1.8);*
- *Pedestrian movement across West Cromwell Road will be improved, particularly at the junction with Warwick Road (para 5.2.1);*
- *A new north-south link to the west of the railway line (para 5.2.1);*
- *...an improved public transport interchange between West Brompton station and Earl's Court station (para 5.2.2);*
- *... reduction and rationalisation of street clutter (para 5.7.1); and*
- *...support the reinstatement of two-way working and significant enhancements to the streetscape (para 5.7.2).*

LBHF ADOPTED POLICY

- UDP Policy G4 sets out the LBHF transport objectives as:



- development will be guided to locations that minimise the need to travel, and will be required to incorporate access arrangements that encourage the use of sustainable modes of travel and transport;
- the intensity of development will be related to accessibility by public transport, with new development expected to promote traffic restraint and reduction, so as to reduce congestion and air pollution and to avoid the need for increased road capacity;
- land use provision for improvements to the road network will only be made where necessary in the interests of traffic safety or maintaining the free flow of essential traffic;
- the siting, design and layout of development will be required to provide:
 - easy access by disabled people
 - safe, secure and direct access by pedestrians
 - facilities to encourage travel to and from the development by cycling and other sustainable modes of travel and transport.
- measures will also be sought, in connection with development proposals, to:
 - secure necessary improvements to, and development of, public transport systems and services, including additional stations on the West London Line;
 - ensure that road safety is not compromised and that the free flow of essential traffic is maintained;
 - minimise vehicle parking demand both by controlling the amount of on-street parking provision and by securing the introduction of complementary parking controls and traffic management measures to control off-site parking;
 - to promote the use of rail and water for freight transport;
 - protect residential areas and main shopping streets from the environmental impact of traffic generated by development proposals.

3.3.9 Policy TN8 defines a hierarchy of roads in LBHF and explains that developments will not be permitted if they hamper the ability of these roads to provide safe and effective access.

3.3.10 Policy TN13 notes that all developments will be assessed for their contribution to traffic generation and their impact on congestion.

3.3.11 Policy TN28 on freight movements, seeks to:

'Encourage and support the confinement of heavy lorries to suitable routes and their exclusion from unsuitable roads, other than for final access to premises.'

3.3.12 The justification to this policy recognises the importance of freight for the local economy, and the potential conflict with the quality of the local environment. The management of freight routes is seen as one way that this can be achieved.

LBHF DRAFT DEVELOPMENT PLAN DOCUMENTS

3.3.13 The Core Strategy Options document for the London Borough of Hammersmith and Fulham (LBHF) was put out to consultation on the 5th June 2009. This document makes reference to the following in the context of the Earl's Court area.

3.3.14 In Section 4, Issues Opportunities and Constraints:



- *...Earls Court...are major opportunity areas because they not only have substantial development potential but because they have very high existing public transport accessibility (para 4.104);*

3.3.15 In section 5, Spatial Vision:

- *... We will have reduced road traffic generated in the borough and will wherever possible have reduced the impact of other road traffic on the local environment. Where we do not control the roads, for example the busy A4 and A40, we will have worked with our partners, particularly Transport for London to achieve these aims. We will also have worked with partners to improve transport in the borough, particularly north south links, as well as the opportunities for cycling and walking. Where there is major development we will have improved access, particularly for pedestrians and cyclists (para 5.17);*

3.3.16 In section 7, Key Spatial Options for Delivering the Council's Vision it is stated that:

- *The Council has a key objective to create decent neighbourhoods, regenerate town centres and the most deprived parts of the borough, particularly White City, West Kensington/Earls Court/North Fulham and Hammersmith and to reduce polarisation and worklessness to create more stable, mixed and balanced communities where people can live, work and prosper (para 7.3)*
- *We think the West London Line is capable of running services to a much higher level to help unlock regeneration potential(para 7.8)*

3.3.17 Within Section 8, consideration is given to the appropriate development type in the Earls Court Regeneration Area. Within this section it is stated that:

- *The area is highly accessible to public transport, being close to West Brompton Station which is on the District and West London Lines and to Earls Court Station, on the District and Piccadilly Lines. Although there is little spare capacity on these lines at peak times, some improvements will take place with the future plans of Transport for London. The highway network in the area is congested through the town centre (past the street market) and south of the A4. (para 8.95)*
- *Employment creation to more than replace the potential loss of the exhibition centre (para 8.111)*



4 Baseline Conditions

4.1 WALKING AND CYCLING

4.1.1 Transport policies at all levels encourage walking and cycling as being the most sustainable and low-impact modes of travel. PPG13 highlights the potential for walking to replace short car trips, especially for journeys under 2km. It also notes that cycling has the potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

WALKING

4.1.2 According to the Mayor of London's website, almost seven million walking journeys on foot are made in London every day and walking accounts for 80 percent of all trips under one mile. Walking is a cost effective, accessible, healthy and enjoyable form of travel, and is a compulsory element of any journey.

4.1.3 The Walking Plan for London – '*Making London a walkable city*' was published by the Mayor in February 2004 to promote walking. The Plan adopts the 'the 5 'Cs' from the London Planning Advisory Committee (LPAC) Walking Strategy for London as key indicators of walkability which are; Connected, Convivial, Conspicuous, Comfortable and Convenient.

4.1.4 The principal shortcomings in the Regeneration Area are the poor pedestrian environment along the A4 and the relative impermeability of the pedestrian network across the West London Line and through the privately-owned Earls Court and Olympia sites.

4.1.5 As there is no direct through route from the LBHF Site to the town centre, residents currently need to use the A4 West Cromwell Road to access Earls Court Road. For example, from Gibbs Green Close (part of the LBHF site) to the junction of Earls Court Road/Nevers Place; the crow fly distance is approximately 815m equivalent to a 10 minute walk whilst the distance walking along the accessible streets would be approximately 1.3 kilometres equivalent to a 16 minute walk

4.1.6 Warwick Road is a predominately residential street with the exception of the Exhibition Centre with good, well maintained and lit footways. Informal crossing points including tactile paving to facilitate north-south movement. There are signalised pedestrian crossings at its junction with the A4 West Cromwell Road and Old Brompton Road and between the tube station and Exhibition Centre. There is, however, a lack of crossing points at intermediate locations along the street which would facilitate crossing movements between the footways along either side.

4.1.7 The A4 is a significant barrier to pedestrian movement; a complicated multi-stage pedestrian crossing is provided at the A4 West Cromwell Road/Warwick Road junction to negotiate the multiple lanes of traffic on a very wide carriageway.

4.2 CYCLING

4.2.1 The London Cycle Network (LCN) is a network of signed routes for cyclists across the capital. Over 550km of the 900km network has been completed to date; final completion is due by the end of 2010. TfL are also investing in an off-road network of routes through London's parks, and along the capital's waterways.

4.2.2 There are some established LCN cycle routes of varying significance in the immediate vicinity. An existing signposted radial route runs along the southern edge of



the site (Lille Road) and a 'recommended' route lies off the north western edge of the area which connects across West Cromwell Road, towards Olympia. The LCN around the Regeneration Area is shown on the following plan.



Figure 3.1: London Cycle Network

4.2.3 However, the Regeneration Area is a notable gap in the existing cycle network in West London. The North End Road, Cromwell Road and the rail corridor present significant barriers to radial and orbital cycle journeys in the vicinity of the area, whilst the Exhibition Buildings and surrounding estate are impermeable to cycle movements across the zone. Consequently, there are no current proposals to improve the cycle network within the Regeneration Area.

4.3 PUBLIC TRANSPORT ACCESSIBILITY

4.3.1 Transport policies place an emphasis on the integration of land use, transport and planning decisions. In particular, the policies stress the need to create more sustainable patterns of development by delivering accessibility.

4.3.2 The accessibility of sites to public transport, particularly those located in London has, since the mid 1990s, been defined by reference to a Public Transport Accessibility Level (PTAL). This methodology identifies an index as a measure of accessibility. This index is expressed as a grade from 1 to 6 where 1 is the lowest and 6 the highest level of accessibility.

4.3.3 The area benefits from high accessibility (up to PTAL 6) with the exception of a PTAL 3 area in the centre of the Regeneration Area. This reduced accessibility arises



due to the lack of permeability across the area and the lack of public transport services currently entering the site due to existing infrastructure.

4.4 BUSES

4.4.1 The existing bus network is shown on Figure 3.2.

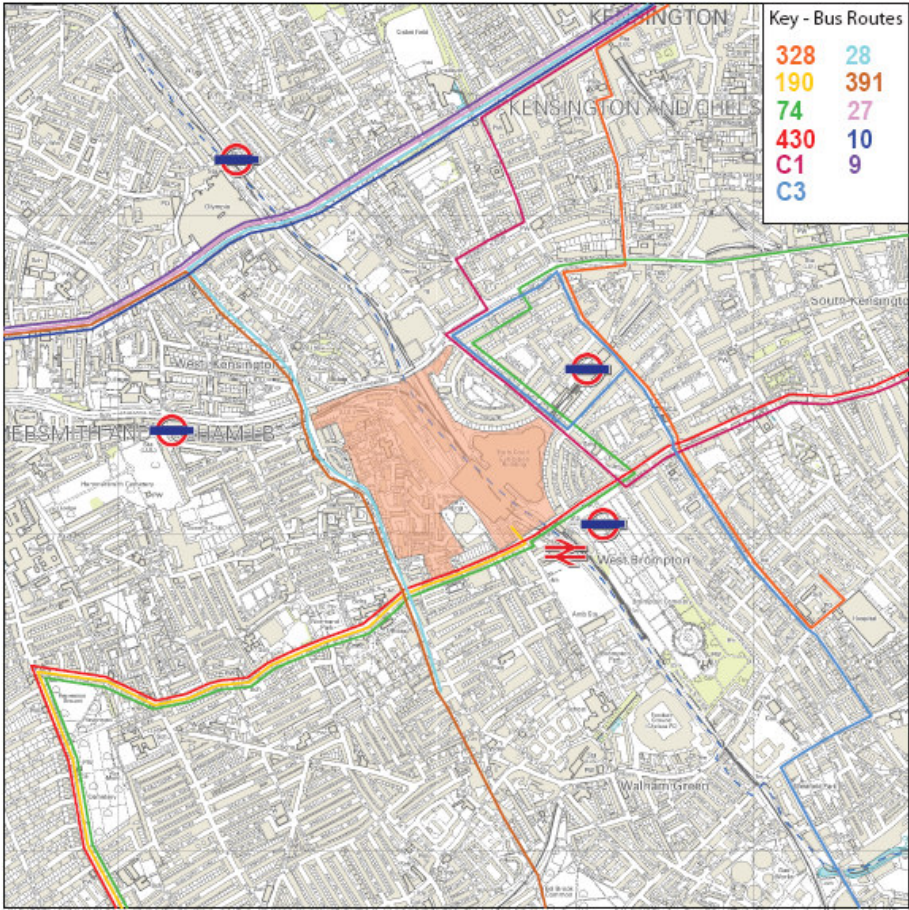


Figure 3.2: Bus Network

4.4.2 The Inner West London bus network was enhanced in late-2006 / early-2007 in order to complement the Western Extension Zone of the London congestion charge scheme. These improvements added a passenger capacity of more than 4,800 in the peak hour, demonstrating the relative ease with which the bus network can be enhanced in a short time scale

4.4.3 However, some bus improvement proposals were frustrated by a lack of bus priority measures and bus standing areas. In addition, the bus priority network around the Regeneration Area is under-developed, with only limited sections of bus lane on North End Road. The lack of bus priority means that services are vulnerable to delays caused by traffic congestion.

4.4.4 A further limitation of the Inner West London bus network is the lack of available land for bus interchanges and operational bus stands. The flexibility of the bus network entails that bus routes have often been established and extended on a “piecemeal” basis, with the result that the network can be fragmented.

4.4.5 For example, around the Regeneration Area there are bus stands:

- between the Empress State Building and Earls Court 2 for the 190 route only;



- at the Warwick Road / West Cromwell Road Tesco for the C3 only;
- at World's End, Chelsea for the 328 only;
- at Notting Hill Gate for the 390 only; and
- near Craven Cottage for the 424 only.

4.4.6 The standard of bus / rail / Underground is also generally poor at the surrounding West Brompton, Earls Court, West Kensington and Kensington Olympia stations.

4.5 RAIL

4.5.1 Rail connections around the Regeneration Area are extensive and provide important links at all geographic scales (local, metropolitan, regional and national) to accommodate increased patronage and are likely to be a main mode of travel for residents, workers and visitors alike.

4.5.2 Understanding the railway services and the connections they offer is key to understanding the way people will access the site in the future. In order to do this Halcrow undertook service analysis at the following stations:

- West Brompton,
- Earls Court,
- West Kensington,
- Kensington Olympia

4.5.3 The following is a list of projects which are likely to feature and have an effect on this project:

- West Coast Main Line timetable change – December 2008/9
- LOROL Service Level 2 timetable (4 trains per hour between Clapham and Willesden/Stratford)
- Interchange with Central Line at White City
- Capacity Improvements on the Piccadilly and District lines
- Southern RUS comments on Gatwick - Watford service and any changes likely to be implemented during the life of the Southern franchise
- LOROL orbital service (2011 for East London Line and later for links to South London)
- Shepherds Bush interchange
- Cross London RUS

4.5.4 On Network Rail, the main constraint to capacity is likely to be the frequency of services on lines that adjoin the West London Line. At the north end of the West London Line (WLL) there are junctions with the North London Line, the Great Western main line (via the South West Sidings route) and the West Coast Main Line (WCML) all of which are heavily used by freight and passenger services. To the south there are two routes to Clapham Junction, a disused route to Waterloo, a route to Victoria via the Battersea reversible line and to the South Eastern network via Factory Junction.

4.5.5 Plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. PPP upgrades due by 2017 are planned for the eastbound Piccadilly and District Lines, as well as the portion of the District Line



between West Brompton and Earl's Court stations, bringing significant relief to each. Providing a new option for those travelling east / west, Crossrail will also assist in further reducing congestion by diverting passengers from the Underground routes in that direction.

4.6 HIGHWAY NETWORK

4.6.1 The Regeneration Area is bounded by the A4 Talgarth Road / West Cromwell Road (to the north), Warwick Road (to the east), North End Road (to the west) and Lillie Road / Old Brompton Road (to the south).

4.6.2 The highway network designations are highlighted on the plan below.

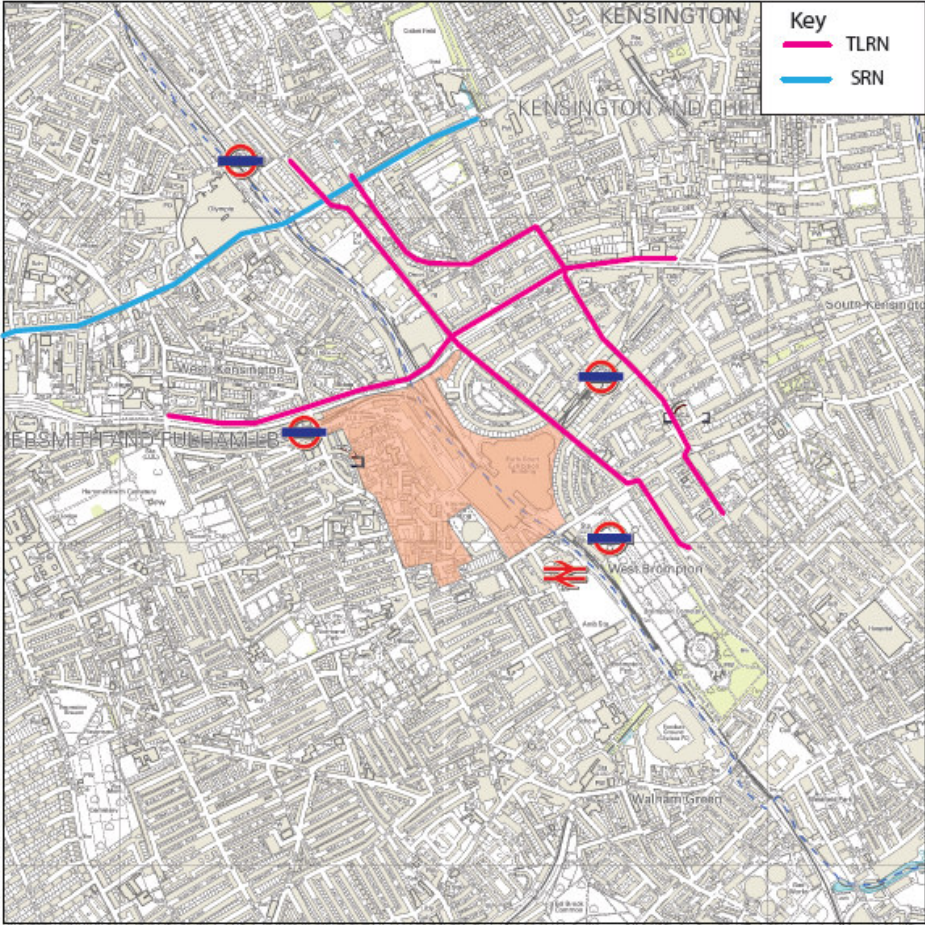


Figure 3.3: Highway Designations

4.6.3 The A4 Talgarth Road / West Cromwell Road and the Warwick Road / Earls Court Road one-way pair all form part of the Transport for London Road Network (TLRN), and the A315 Hammersmith Road / Kensington High Street is part of the Strategic Road Network (SRN).

4.6.4 Weight restrictions are in place on some railway bridges. To the north at Hammersmith Road railway bridge is a 12 tonne restriction. To the south at Fulham Road is a 7.5 tonne restriction. No weight restrictions apply to West Cromwell Road railway bridge. Sections of Lillie Road and the A219 Fulham Palace Road are also subject to a width restriction of 2.1m.

EXISTING TRAFFIC FLOWS



4.6.5 The latest traffic flow information for the AM and PM peaks is presented on the following images, which are based on post-extension survey data gathered by WSP in 2007 and 2008. The traffic surveys were all undertaken during periods when no event was in progress at Earls Court.

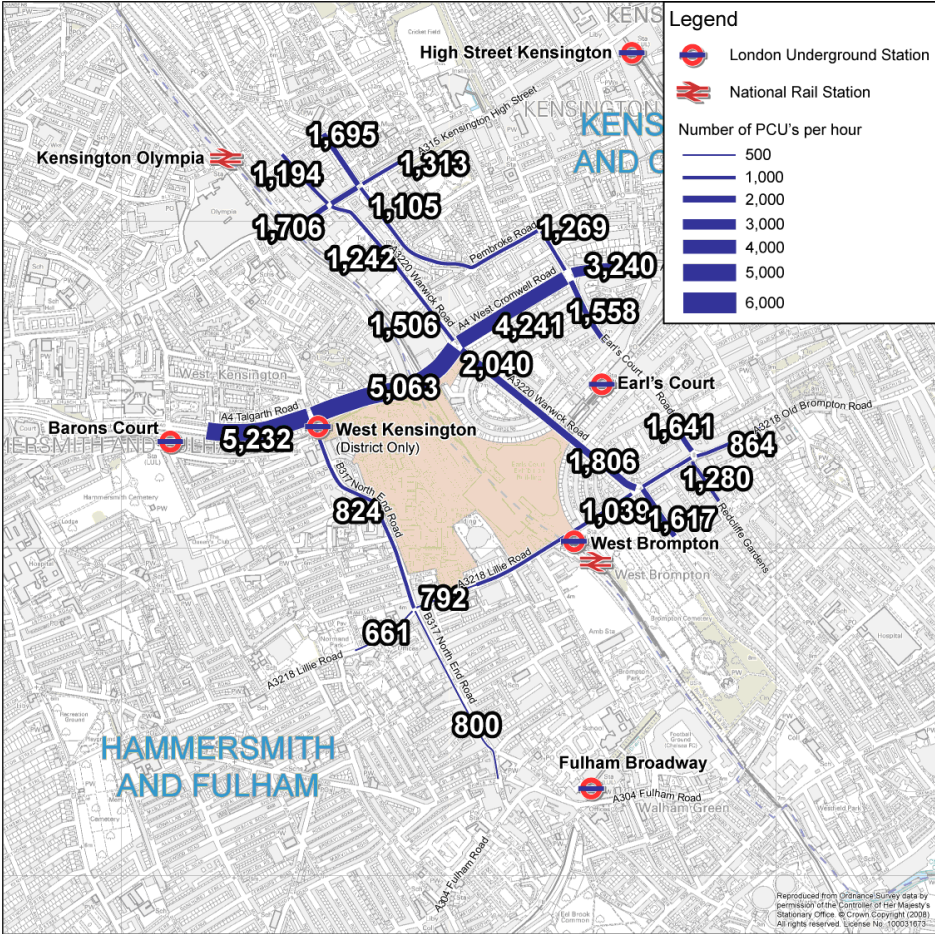


Figure 3.4: AM Peak Hour Traffic Flows (two-way totals)

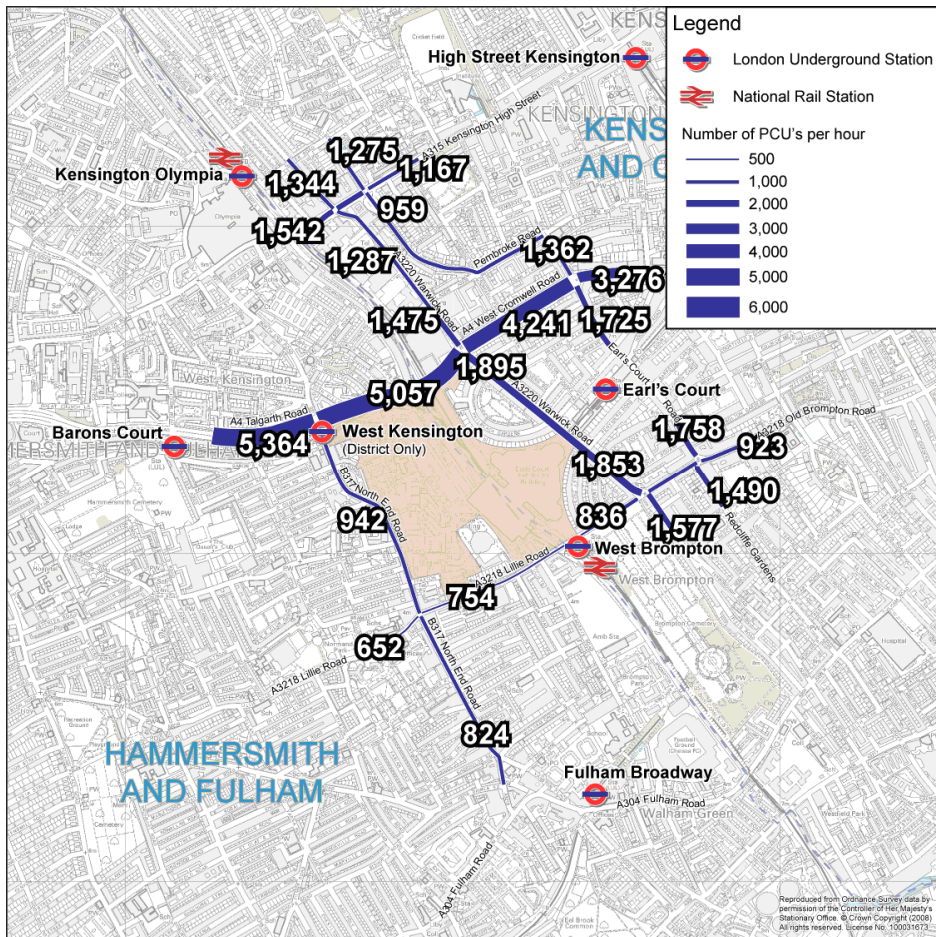


Figure 3.5: PM Peak Hour Traffic Flows (two-way totals)

4.6.6 These Figures show that the dominant movement through the area is east-west through traffic, followed in magnitude by the north-south through traffic. The detail of the individual junction turning movement surveys also shows there is a substantial west-south through movement from the A4, turning right onto Earls Court Road and then continuing south on Redcliffe Gardens. The reverse movement from Finborough Road north to Warwick Road and then turning left onto the A4 westbound is also a dominant movement (half of the Warwick Road traffic approaching the A4 subsequently turns left onto the A4).

EXISTING TRAFFIC GENERATION

4.6.7 The existing traffic movements which are generated by the current uses of the Regeneration Area have been surveyed.

4.6.8 The existing Earls Court exhibition centre traffic movements have been studied in detail with extensive analyses of the exhibition centre servicing and commercial vehicle marshalling procedures. It was found that the existing traffic generation is subject to considerable variation, depending on the events taking place at Earls Court at any one time.

4.6.9 The existing traffic generation therefore varies from a minimum of some 400 vehicles per hour up to around 1000 vehicles per hour. Much of the peak traffic is composed of van and lorry-sized delivery vehicles associated with the build-up and break-down of exhibition events.



EXISTING HIGHWAY CAPACITY

4.6.10 WSP has carried out junction capacity modelling of the key junctions on the local highway network. This initial feasibility exercise has demonstrated areas where there is existing highway capacity, and other areas with scope for improvements. Further junction capacity modelling will be carried out independently by TfL.

4.7 SUMMARY

4.7.1 The Regeneration Area benefits from a high level of public transport accessibility across the majority of the area. The principal shortcoming in the Regeneration Area at the moment is the lack of internal connectivity for all modes of travel for the types and intensity of uses contemplated through redevelopment. The dominance of the road network and presence of railway lines reduce pedestrian connectivity in certain areas. The bus priority network and London Cycle Network is also sparse within the vicinity of the Regeneration Area. The Regeneration Area transport strategy will consider opportunities for addressing these issues in collaboration with relevant local authorities and key stakeholders and is discussed further in Section 5 of this study.



5 Transport Impact

5.1 TRAVEL DEMAND ASSESSMENT

5.1.1 A travel demand forecast has been calculated from the indicative land use budget summarised below.

Table 4.1: Indicative Land Use Budget (Gross External Area)

Use Type	Low to High (Sq m) (GEA)
Office	400,000 to 550,000 sq m
Residential	850,000 to 900,000 sq m
Retail	40,000 to 55,000 sq m
Hotel	45,000 to 65,000 sq m
Culture, Destination and Leisure Uses	35,000 to 50,000 sq m
Education and Other Social and Local Community Facilities	10,000 to 20,000 sq m
Total	1,380,000 to 1,640,000 sq m

5.1.2 Each element of the indicative land use budget has been discussed with the relevant specialist in the Capital & Counties team to ensure that the travel demand assessment is an accurate reflection of the specific forms of development which could come forward in each land use category.

5.1.3 The forecasting exercise has referred to the following information sources and is based on:

- TfL's TRAVL database information;
- trip generation estimates by mode, using data which has been accepted by RBKC, LBHF and TfL recently in respect of other nearby development proposals
- Census Output Area data for nearby locations
- The sustainable transport strategy which is being developed for the Regeneration Area.

5.1.4 Based on these preliminary studies, the total travel demand for the proposed residential, office, hotel and retail uses is likely to be in the region of 20,000 and 19,000 two way person trips in the AM peak and PM peak hours respectively. The modal share for these trips would reflect the accessibility of the area:

- It is predicted that approximately 70% of journeys will be by public transport modes;
- Walking would be the next most significant mode of travel accounting for approximately 16% of journeys (main mode);
- Car driver trips would be minimal accounting for approximately 3% of journeys.

5.1.5 It should be noted that the mix of complementary land uses within the indicative land use budget will reduce the need to travel by providing shopping, and leisure opportunities and social/ community facilities within walking distance of residents living in the area.



5.2 PEDESTRIANS

5.2.1 The land use budget would generate large pedestrian flows, which mostly arise due to people walking between the nearby Earls Court, West Brompton and West Kensington stations and the Regeneration Area.

5.2.2 The key areas to be addressed will be the possible upgrading of station access capacity to cater for these additional pedestrian flows and the provision of high-quality and high-capacity crossing points on pedestrian desire lines which cross busy roads.

5.2.3 The change in pedestrian flows in the wider area beyond the stations will be less significant, but will need to be studied in detail to ensure a satisfactory level of service and upgrading where required.

5.3 CYCLING

5.3.1 The potential demand would result in a large increase above existing cycle flows in the area. This creates a need for high-quality cyclist facilities within the Regeneration Area, including cycle parking, cycle lanes and showering / changing facilities throughout the proposed land uses.

5.3.2 The uplift in cycling demand is such that the off-site cycling network will need to be upgraded in order to provide safe and attractive routes.

5.4 BUSES

5.4.1 Bus demand would also increase significantly, thus generating a need for bus service improvements to add capacity to the network and for on-site and off-site bus priority and other infrastructure to improve the attractiveness of bus travel.

5.4.2 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider – local and metropolitan – transport network and to providing sustainable transport options.

5.4.3 On-site facilities should include modern bus interchanges which link with the tube and train stations to improve the integration of public transport journeys, plus dedicated on-site bus lanes to improve journey times and the reliability of bus journeys relative to car travel. These should be considered alongside bus improvements to the surrounding area.

5.5 RAIL

5.5.1 As discussed in Section 3.5, a number of plans are already in place for new trains and increased frequencies as part of the LUL PPP programme, which will provide important enhancements and increased capacity to the Underground network. Collectively these improvements create the significant new rail capacities necessary to ensure the full redevelopment of the Regeneration Area given its central location and proposed future as a sustainable mixed use district and can accommodate, with some modifications, the movement demands anticipated.

5.5.2 Specific improvements over and above those already contemplated under the PPP and Crossrail initiatives may be required in the AM peak inbound to add service to the West London line and to relieve inbound congestion on the District Line from Putney. Halcrow has developed a number of supporting plans and new base timetable that will allow increased demand to be catered for.

5.6 HIGHWAY NETWORK

5.6.1 The potential net impact on the highway network has been forecast within a range, which depends on whether it is compared against an existing event taking place



at Earls Court Exhibition Centre, or whether it is considered against the situation where Earls Court Exhibition Centre is not in use.

5.6.2 For the existing situation where a large event takes place at Earls Court Exhibition Centre, the forecast shows an overall 2% reduction in traffic on the surrounding road network. This is due to the high traffic generation of existing Earls Court Exhibition Centre shows, especially for the build-up and break-down periods where high volumes of large exhibitors' vehicles access the EC 1+ 2 site. The indicative land use budget would generate less traffic than the existing large Earls Court Exhibition Centre events.

5.6.3 When the comparison is based on a scenario where there is no event at Earls Court Exhibition Centre, the outcome is a 2% increase in traffic across the surrounding road network. There is scope for this level of traffic impact to be accommodated, subject to highway capacity improvements, traffic signal re-timing and better traffic management.

5.7 SUMMARY

5.7.1 The indicative land use budget is anticipated to result in approximately 20,000 and 18,700 two way person trips in the AM and PM peak hours respectively. The increased demand resulting from the indicative land use budget could be accommodated through infrastructure improvements across the local transport network.



6 Transport Strategy

6.1 OVERVIEW

6.1.1 The high-level objectives of the Regeneration Area sustainable transport strategy are:

- to mitigate existing transport problems;
- increase accessibility across the area; and
- to deliver attractive sustainable transport choices for future residents, employees and visitors to the Regeneration Area itself and its surroundings.

6.1.2 Possible measures to deliver the high level objectives listed above are discussed in detail below. These measures would contribute to both RBKC's and LBHF's aspirations for the development of the Earl's Court area as set out in Section 3.4.

6.1.3 Underpinning the transport strategy is the concept of complementary land uses which have the potential to achieve the PPG13 aims of promoting mixed use development in city, town and district centres, and near to major public transport interchanges in order to achieve vitality and diversity and promote walking as a primary mode of travel.

6.1.4 The proposed transport measures will perform best if they are implemented and managed in an integrated manner, and their effects monitored and reviewed as the development progresses.

6.1.5 The transport strategy will be designed to deliver the long term governance of the transport proposals, maximising their effectiveness in relation to the proposed land uses and the surrounding area, incentivising the achievement of sustainable travel patterns, and delivering the transport outcomes required for the development. The transport strategy will be discussed extensively with TfL, the Boroughs and other stakeholders.

6.2 WALKING & CYCLING

6.2.1 It is recognised that physical aspects of new development will influence travel patterns and can reduce dependence upon the private car. An integral part of promoting sustainable travel will therefore be the design of the development which should prioritise cyclists and pedestrians.

6.2.2 A network of connections could link roads, pedestrian connections and pathways leading to important destinations, such as the Underground stations, major public open spaces and shopping, and connect the area to adjacent neighbourhoods. Extensions to the London Cycling Network should be an integral feature of this network. The design of the overall network should provide a hierarchy of connections, the logic of which can easily be understood by residents as well as visitors. The elements of the network (roads, pathways, etc) should provide sufficient space and a public realm to ensure a comfortable walking or cycling experience. The routes should be well-maintained and legible with lighting, signage and the use of quality materials.

6.2.3 Additional measures that could be considered include:

- Cycle parking in excess of planning standards;



- A bike zone, with public cycle hire and maintenance facilities; and
- Electric charging points for powered cycles, based on renewable energy sources such as solar.

6.2.4 In February 2008, the Mayor announced a new programme aimed at achieving a growth in cycling of 400 percent by 2025. This would mean that five percent of all trips in London were made by bike. The three strands of the programme are:

- Bike hire in central London, providing a new public transport mode for short business and visitor trips;
- Cycling corridors, offering commuters with high profile, clearly signed priority routes from inner to central London; and
- Bike Zones, covering a radius of about 5km around London's town centres, incorporating 20mph speed limits, cycle priority streets, greenways and a network of cycle-friendly routes to link schools, stations, residential areas and workplaces, supported by cycle training, parking and travel planning.

6.2.5 The location and land use patterns in the Regeneration Area have potential to benefit from the proposed cycling corridors and Bike Zones.

6.3 BUSES

6.3.1 A reliable and comprehensive bus service through and around the area would be an essential element to integrating it into the wider transport network and to providing sustainable transport options. The following initiatives should be further explored as ways of achieving these objectives:

- Create / improve interchange between buses, rail and underground at West Brompton, Earls Court and West Kensington;
- Create a new on-site bus interchange and extend the surrounding bus routes into the site;
- Create through-routes for buses, with on-site bus priority;
- Propose off-site bus priority and infrastructure improvements;
- Increase the frequency of existing bus services; and
- Propose bus links to key locations and areas which lack a tube or rail connection, such as the Kings Road area and other poorly-served areas of both Boroughs.

6.4 RAIL

6.4.1 Halcrow has undertaken extensive work to consider a number of alternative measures that could be delivered to avoid any potential hotspots on the network and improve capacity on the West London Line (WLL), including the possible introduction of a new base timetable to accommodate the increased demand.

6.4.2 A preferred option would be providing additional services from Clapham Junction to Shepherd's Bush, turning around at North Pole Depot with an extension to Watford to offer a frequent service on the WLL and additional hourly connection with the West Coast Main Line.

6.5 HIGHWAY NETWORK

6.5.1 The proposals will seek to contribute to the aspirations that both RBKC and LBHF has for the area by providing strategic benefits for the highway network through its design. The specific alignments and connectivity of any future road system would be



dependent on the character of the redevelopment; however the following measures would be considered:

- Assessment of any contribution (as required and related to the development) to the tackling the Earls Court One-Way system;
- Provide a north/ south route through the Regeneration Area, which has the capacity to relieve through traffic from both directions of the Earls Court One-Way system. Initial assessments have indicated that the level of relief could be sufficient to achieve :
 - reduced traffic impact
 - improved local air quality
 - reduced community severance
 - improved pedestrian and cyclist conditions
 - improved bus facilities
 - better on-street loading and parking for local businesses;

This concept would need to be assessed in further detail and its implementation would be dependent on extensive consultation and the progress of statutory procedures. The phasing of its delivery relative to other elements of the Regeneration Area would need to be considered carefully

- Improvements to the A4 / North End Road junction to provide an opportunity to improve bus/tube interchange at West Kensington station and increase capacity where possible for north-south traffic and for movements into the area;
- Reduce impact on local roads by providing direct access from the A4;
- Locate accesses at existing points (e.g. the Earls Court, West Brompton and Lillie Road forecourts) and at existing side roads from North End Road which have potential to be connected into the area;
- Provide a separate service road under raised parts of the development. There are potential alignments that could follow the main north / south track corridor; one could run north from Lillie Road at the bridge location to the west of the tracks. Further detailed studies would be undertaken in association with a specific development proposal to determine the alignments and design of these routes;
- Consider the potential for an Urban Consolidation Centre (UCC) to reduce service vehicle movements in the area, with on-site electric-powered vehicles to distribute goods around the Regeneration Area with zero carbon impact.
- Develop Travel Demand Management (TDM) measures in liaison with the project partners and planning authorities, such as:
 - Potentially promoting low-emission Car Clubs on the sites
 - encouraging public transport, walking and cycling
 - adopting parking ratios below the maximum standards, and controlling off-site parking impacts
 - implementing Travel Plans for the residential and commercial uses
 - personalised travel planning;
- Promote a Low Emission Strategy, in line with the Beacon Councils Air Quality Group recommendations (RBKC is a member of this Group); and



-
- Examine the potential for electric car charging stations based on renewable energy sources such as solar.

6.6 SUMMARY

6.6.1 The transport strategy for the Regeneration Area will contain a package of measures to encourage local travel and travel by sustainable modes. The developer will work with local stakeholders and local authorities in preparing and implementing the strategy as a masterplan for the Regeneration Area progresses. Measures that could potentially be included in the strategy have been considered above. However, the specific measures will be dependent on the character of the redevelopment with due consideration to the Borough’s aspirations for the area.



7 Conclusions

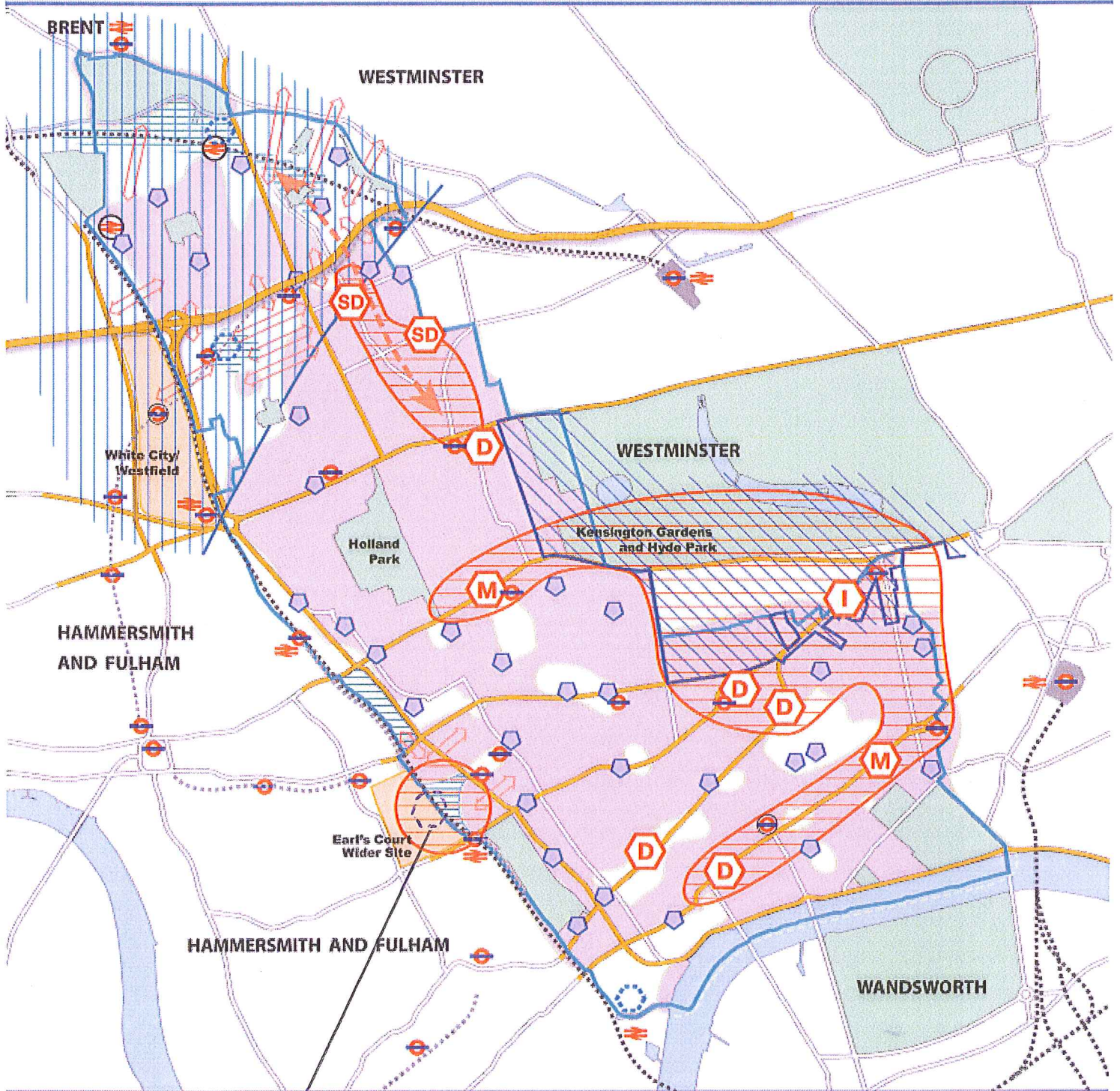
7.1.1 This Summary Transport Study is a technical evidence base document which supports the Earls Court Regeneration Area. The study has considered the transport implications of an indicative land use budget for the Regeneration Area.

7.1.2 The indicative land use budget is anticipated to result in approximately 20,000 and 19,000 two way person trips in the AM and PM peak hours respectively. This increased demand would affect all modes of travel, but preliminary studies to date indicate that a range of transport improvements would allow this level of demand to be accommodated.

7.1.3 The provision of additional transport infrastructure to support the Regeneration Area would be complemented by a package of planning and transport measures to promote sustainable travel choices, reduce the need to travel and minimise car dependency, in line with national, regional and local policy aims. These measures have the potential to improve a number of existing transport issues in RBKC and LBHF and will be developed as a Masterplan for the Regeneration Area evolves.

KEY DIAGRAM


- | | | | | | | |
|--|--|---|---|--|---|--|
|  | Regeneration |  | Neighbourhood Centre |  |  | New stations |
|  | Areas with particular National or International Reputation |  | New Centre |  | Metropolitan Open Land/Cemeteries | |
|  | Conservation Areas (largely residential) |  | International, Major, District and Special District Centres |  | Kensal Notting Hill Gate Connection | |
|  | Central Activity Zone |  | |  |  | Thames and Grand Union Canal showing bridges |
| | |  | |  | Better connections and legibility needed | |
| | | | |  | Broad locations of development | |





ADD 'APPROPRIATE NEW CENTRE' NOTATION

QUANTUM OF DEVELOPMENT


Broad Locations

 Broad locations of main existing and proposed employment uses

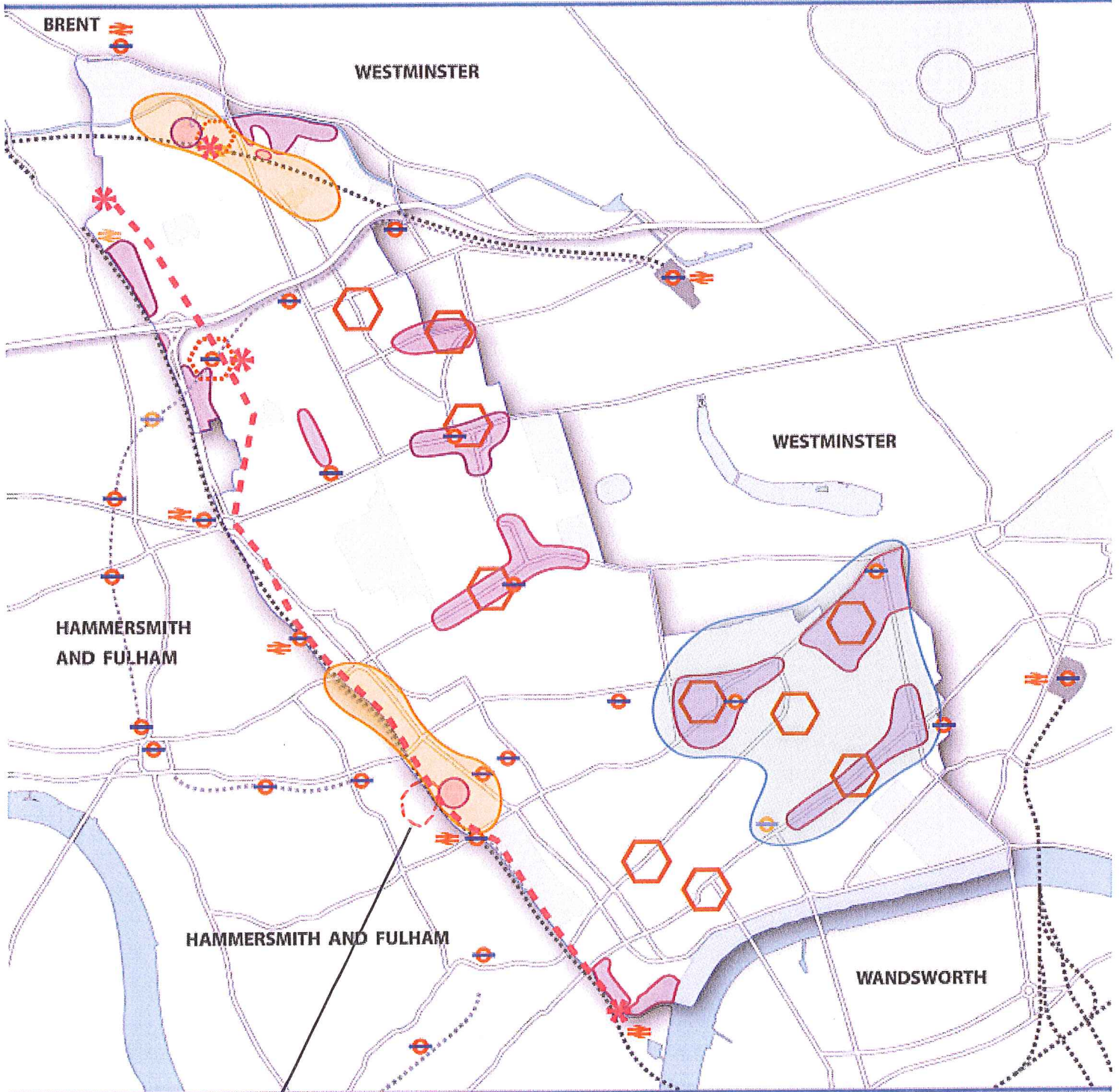
 Broad locations of significant new housing

 Location of town centres with scope for possible expansion

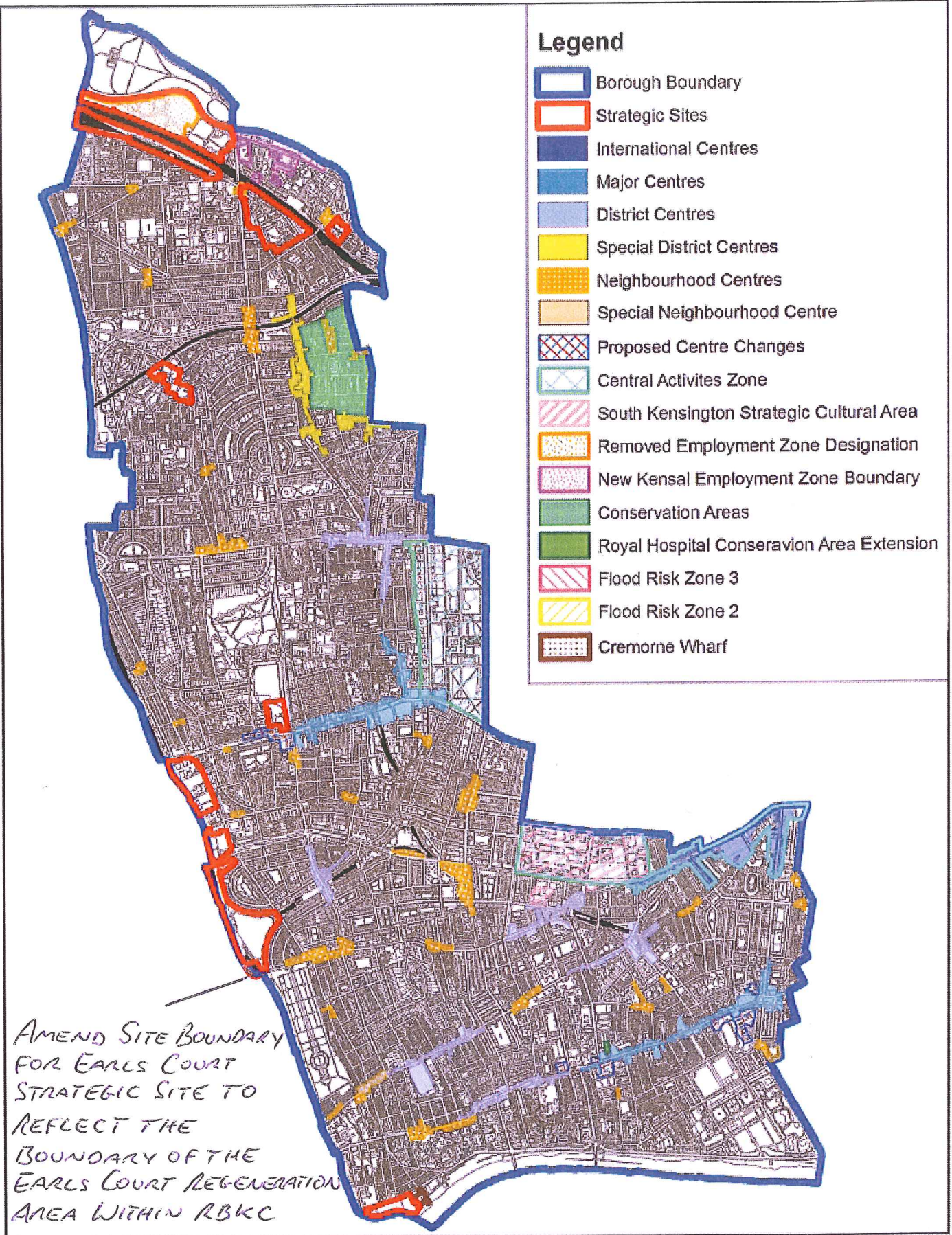
 Town Centres (excluding neighbourhood centres)

 Possible new centre

 Main strategic infrastructure investment









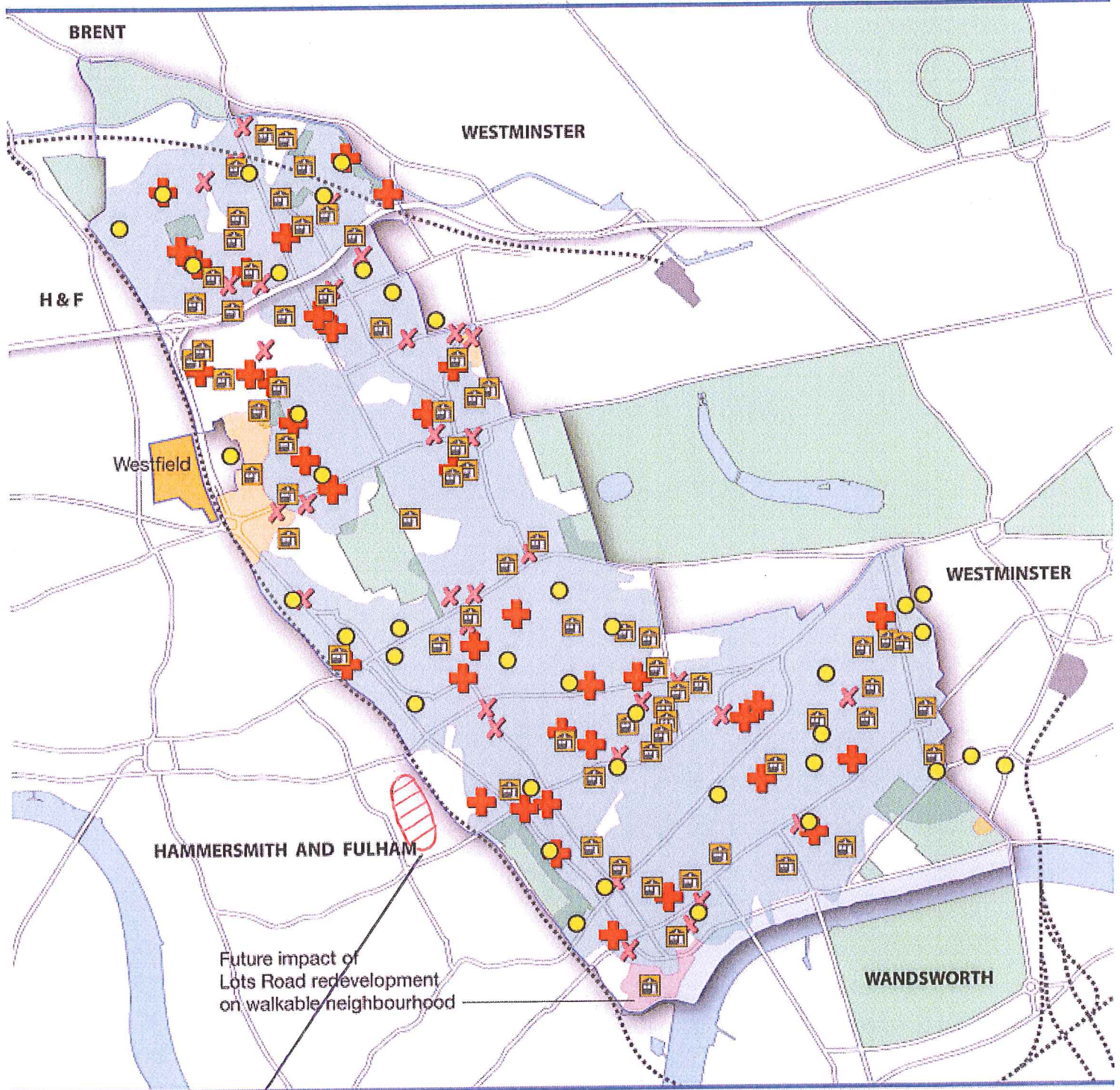
ADD 'APPROPRIATE NEW CENTRE' NOTATION



KEEPING LIFE LOCAL

Social and Community Uses, Local Shopping Facilities and Walkable Neighbourhoods

-  General Practices/Surgeries
-  Dental Surgeries
-  Schools
-  Within 400m or 5mins walk of a Neighbourhood or Higher Order Town Centre
-  Neighbourhood Shopping Centres
-  Areas within 400m or 5mins walk of neighbourhood centres outside of the Royal Borough



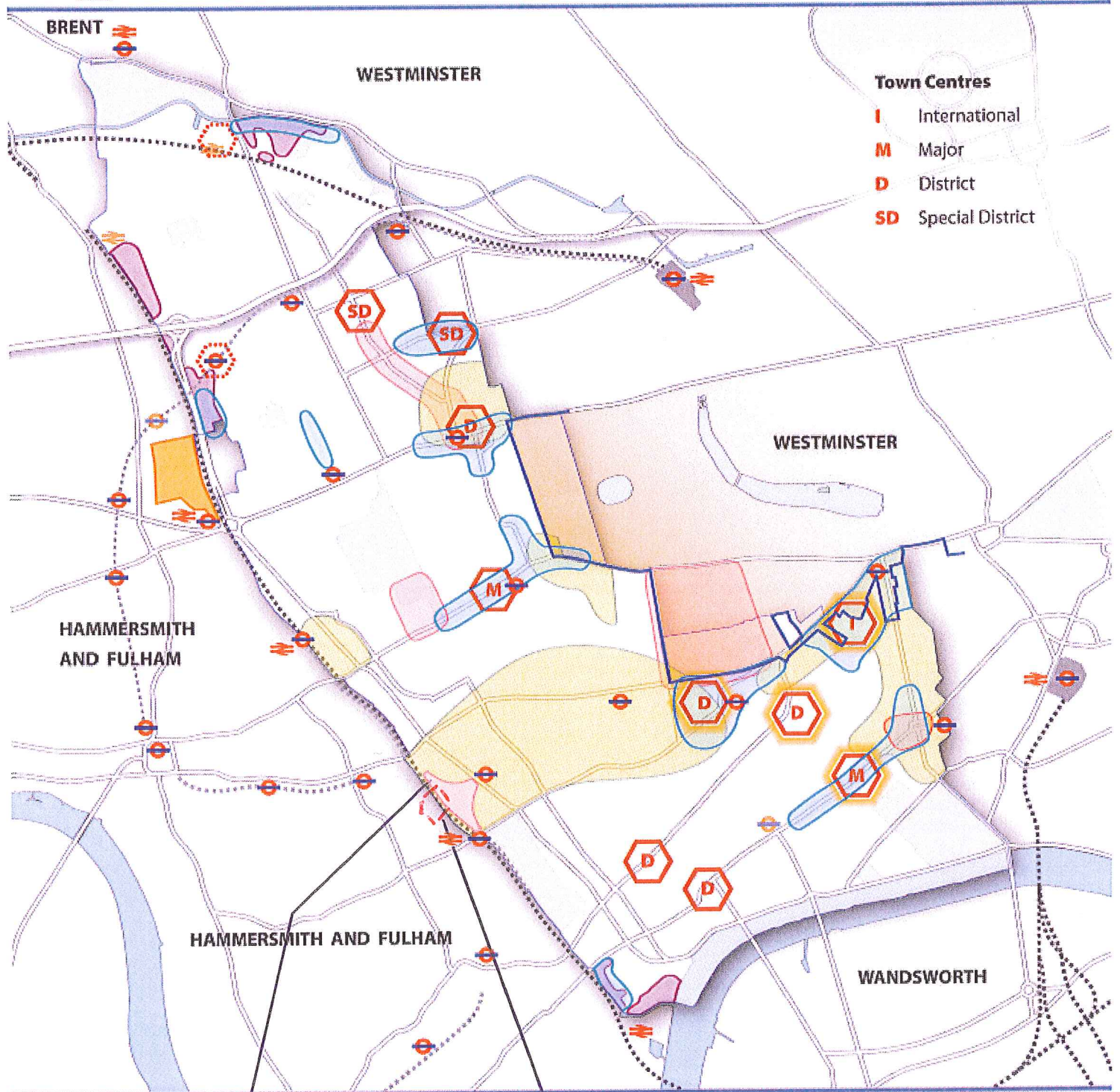
Note: Larger shopping centres shown on 'Fostering Vitality' map

ADD 'EARLS COURT
WIDER SITE'

FOSTERING VITALITY

Town Centres, Retail, Arts and Culture and Business,

- Employment Zones
- Westfield London Shopping Centre
- Concentration of Cultural Uses
- Concentration of Offices
- Concentration of Hotels
- Town Centres
- Centres identified for possible expansion
- Possible new centre
- Central Activities Zone (CAZ)

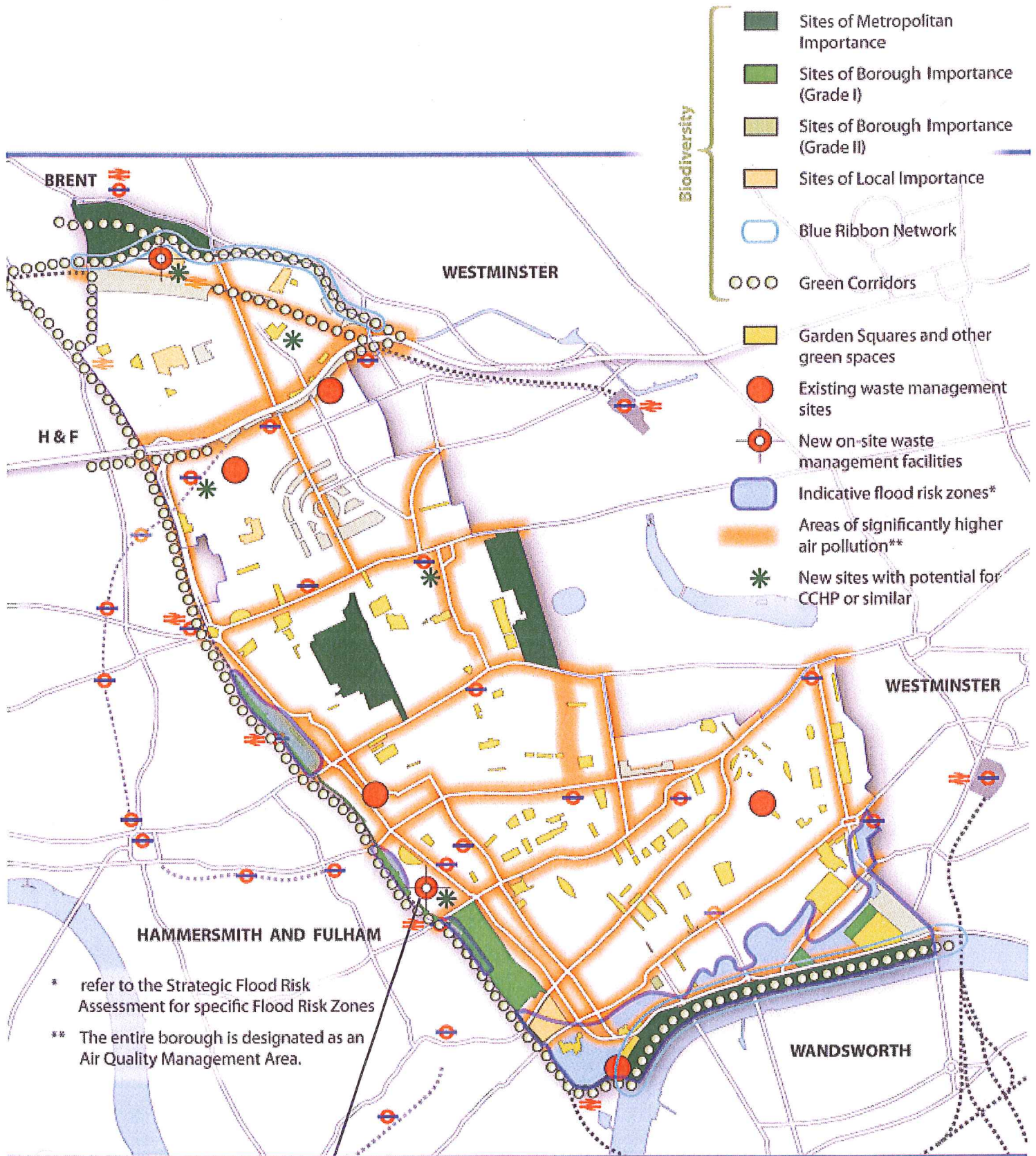


EXTEND THE CONCENTRATION OF CULTURAL USES ACROSS THE EARLS COURT WIDER SITE

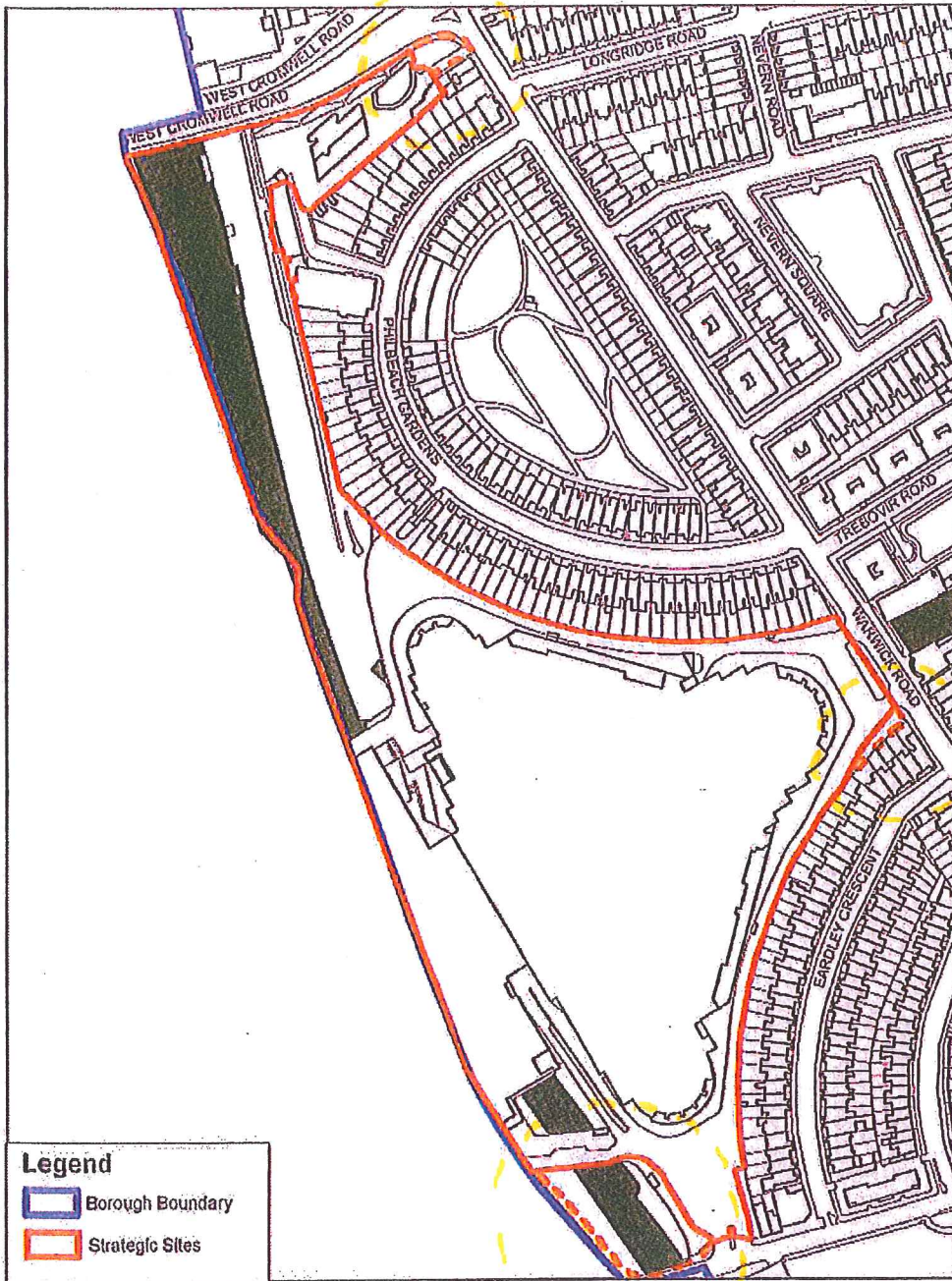
ADD 'APPROPRIATE NEW CENTRE' NOTATION

RESPECTING ENVIRONMENTAL LIMITS

Climate Change, Flooding, Waste, Biodiversity, Air Quality.



ADD NOTATION THAT A 'POTENTIAL' ON-SITE WASTE MANAGEMENT FACILITY MAY BE LOCATED WITHIN THE EARLS COURT WIDER SITE



Legend

-  Borough Boundary
-  Strategic Sites



Strategic Site: Earl's Court



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-  AREA OF CHANGE.
-  PROPOSED AMENDMENT TO BOUNDARY

Chapter 10 Earl's Court

10.1 Introduction

10.1.1

~~The area around~~ Earl's Court ~~in the Royal Borough~~ has a 'village' feel. That does not mean that it has medieval roots, it is largely Victorian. It has a strong sense of place, and the largely residential environment is supported by a good mix of 'day-to-day' uses. But it also contains the Earl's Court Exhibition Centre, one of London's top music, exhibition and conference venues. So Earl's Court, like so many places in Kensington and Chelsea, fulfils both a local and a London-wide role.

10.1.2

Earl's Court Town Centre, on Earl's Court Road by the eastern entrance to the underground station, provides a range of shops, restaurants, cafés and pubs, primarily meeting the needs of people that live in the area. Its important local role will be recognised in the revised edition of the London Plan where it ~~may be~~ classified as a Neighbourhood Shopping Centre. The quality of the town centre is ~~impacted, by the one-way south-bound traffic, which forms part of the Earl's Court One-Way System, stretching from Shepherd's Bush in the north, to Chelsea Embankment in the south. The one-way system travels north up Warwick Road, and degrades the residential environment of that street. The Cromwell Road also acts as a significant barrier to pedestrians.~~

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~~The area around~~ Earl's Court is well served by public transport. It is one of the main underground interchanges in the Borough. West Brompton Station provides an interchange with the West London Line. The area is also well served by buses, although using buses can be confusing because of the one-way system. The one-way system also makes for a poor pedestrian environment.

10.1.4

~~The area around~~ Earl's Court ~~in the Royal Borough~~ is ~~largely~~ residential, with a range of different property types. It has a relatively high concentration of private-rented houses and of social housing, well integrated with the private housing stock.

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10.1.5

There is at present no obvious way to get from the Exhibition Centre to the Town Centre with the underground station separating rather than connecting these two parts of Earl's Court.

10.1.6

Earl's Court Exhibition Centre plays a very important role locally and on a London-wide basis. The Exhibition Centre will be hosting the 2012 Olympic volleyball tournament and no major changes are planned before this date, ~~though servicing and access arrangements may be improved in the interim.~~ After 2012, however, the landowners plan to redevelop the site. The Earl's Court Exhibition Site extends into the neighbouring London Borough of Hammersmith and Fulham where it forms part of the Earl's Court, West Kensington and North Fulham Regeneration Area and where the preferred option is for a phased redevelopment, based on West Kensington and Gibbs Green estates, over 20 years. The two boroughs and the land owners have been in discussions regarding a comprehensive regeneration and improvement scheme. The landowners will work with the planning authorities of both boroughs, key local stakeholders and the local community to establish how this can be achieved.

10.1.7

Earl's Court lacks public open space, although the Brompton Cemetery is just to the south. This is one of the largest green spaces in the Borough at 16.5 hectares (40.8 acres). The Council is working with the Royal Parks to take over the ownership of the cemetery.

10.2 Vision

Vision for Earl's Court in 2028

By ~~improving the one-way system, and improving the pedestrian environment,~~ the western edge of the Borough will be reintegrated and Earl's Court town centre will be able to blossom,

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offering an attractive 'urban-village' environment which local residents can enjoy. The function of the town centre will be reinforced by a new good direct connection to the current Exhibition Centre, which should be developed for a mix of uses as part of a scheme or vision for the wider Earls Court Regeneration Area and should include residential and non-residential uses with significant cultural/destination uses that maintain Earls Court's reputation as a destination. A major housing and mixed use scheme including office, leisure, hotel, retail and community facility uses will ensure that the Earls Court site will therefore retain its important function London-wide and will be transformed into a new vibrant urban quarter and town centre.

The area will continue to offer a wide range of types of residential accommodation and will include community infrastructure to support local life. Streetscape and pedestrian improvements to Cromwell Road, Warwick Road and Earls Court Road will transform the environment, making it more pleasant for pedestrians and residents and marking the arrival of the A4 in Central London.

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10.3 Priorities for Actions

10.3.1

The priorities for action for Earls Court have been set out under the Strategic Objectives for the Core Strategy as a whole. The Strategic Objectives are not listed in the same order for each place, instead they have been listed in order of importance for delivering the vision for each place.

Better Travel Choices

10.3.2

The priority is the improvement of the one-way system⁽¹⁰⁰⁾. The on-site road pattern and connections resulting from the redevelopment must be designed with regard to seeking to improve traffic circulation in the surrounding area, and on primary routes in the London Borough of Hammersmith and Fulham and the Royal Borough, such that it helps to enable the delivery of the improvement of the Earls Court One-Way System, for which initial feasibility work has already been undertaken. No funding for this project is at present allocated by Transport for London. The Royal Borough will therefore work in partnership with Transport for London amongst others regarding its potential scope and delivery, subject to feasibility and viability.

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10.3.3

Pedestrian movement across West Cromwell Road will be improved, particularly at the junction with Warwick Road, as well as improvements to the pedestrian environment on Warwick Road north of West Cromwell Road⁽¹⁰¹⁾.

10.3.4

Transport for London and the Greater London Authority (GLA) are partners in the planning and delivery of the future development in the wider Earls Court site. The Council will work in partnership with them to overcome transport constraints on the development safeguarding the operational railway.

10.3.5

The Council will also consider the potential for improved accessibility from the West London Line to the underground network⁽¹⁰²⁾.

Renewing the Legacy and Fostering Vitality

10.3.6

Most of the area falls within conservation areas and there are a number of listed buildings, including Earls Court Station, and St. Cuthbert's Church in Philbeach Gardens (Grade II*). Maintaining this legacy is important to the future success of Earls Court⁽¹⁰³⁾.

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10.3.7

The redevelopment of the wider Earls Court, West Kensington and North Fulham Regeneration Area provides an opportunity to create a legacy for the future⁽¹⁰⁴⁾. It also offers the potential for regeneration of both North End Road, located within the London Borough of Hammersmith and Fulham, and of Earls Court district, centre in the Royal Borough.

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Key to the long-term success of the area is the redevelopment of the Exhibition Centre. Earl's Court, however, must retain its long standing role as an important cultural destination. Significant cultural/destination uses should be provided in the wider Earl's Court Regeneration Area to continue the long tradition of some form of cultural destination. It is expected this will be in the locus of Earl's Court⁽¹⁰⁵⁾.

10.3.9

There is a heavy concentration of hotels in Earl's Court. Following the Olympics, some of these existing hotels could be converted into residential accommodation⁽¹⁰⁶⁾.

Keeping Life Local

10.3.10

Earl's Court Town Centre provides local shops and community services to local residents, such as health care and a post office. The Council recognises the importance of this shopping centre to cater for local needs and will work to improve it⁽¹⁰⁷⁾. Community facilities will be provided as part of the developments at 100 West Cromwell Road and the Warwick Road sites, including a new primary school at the northern end of Warwick Road. The Council will support the Primary Care Trust's ambition for better health facilities within the Earl's Court Town Centre⁽¹⁰⁸⁾.

10.3.11

Facilitating the connection of any redevelopment of the wider Earl's Court Regeneration Area to the Earl's Court Town Centre is important in realising the regenerative potential of the scheme. The Earls Court Regeneration Area itself will be designated a new town centre, with its location and status to be refined through the production of a Planning Framework.

Diversity of Housing

10.3.12

Earl's Court should have a diverse housing tenure. There are significant new housing projects at 100 West Cromwell Road alongside Tesco, and further north in Warwick Road. Guidelines have been prepared for these sites. In addition, over the Earl's Court, West Kensington and North Fulham Regeneration Area it may be possible to achieve between 8,000 to 10,000 new dwellings, subject to capacity and masterplanning. Establishing the exact capacity is dependant on further detailed work relating to transportation accessibility and masterplanning, including work undertaken at the London Plan Review level in relation to the Opportunity Area⁽¹⁰⁹⁾ and the Planning Framework Document for the wider Earl's Court Area being prepared.

An Engaging Public Realm

10.3.13

Earl's Court Road is in need of improvement, including new shop frontages, better building maintenance and a reduction and rationalisation of street clutter.

10.3.14

The sites located in Warwick Road will have an important role in providing public open space, an improved streetscape and community facilities⁽¹¹⁰⁾.

10.3.15

Improving the one-way system is central to improving the public realm and the Council will support work to study the feasibility of reinstatement of two-way working and significant enhancements to the streetscape. Improvements have been made to the street environment in many of the streets surrounding the Earl's Court One-Way System. However, there are also plans to transform the environment in Cromwell Road, introducing avenues of trees and bringing significant improvements to the pedestrian experience and to improve the pedestrian environment in Warwick Road⁽¹¹¹⁾.

10.3.16

Brompton Cemetery, which is a Grade I Registered Park and Garden of Historic interest, is open to the public for wider quiet recreational use and provides a good pedestrian link from Brompton Road to the Fulham Road. There will be further provision of public open space as part of the Warwick Road development. Moreover, the wider Earl's Court Regeneration Area will provide publicly accessible open and play space to provide for new residents and address existing deficiencies⁽¹¹²⁾ through playable open space and facilities.

Respecting Environmental Limits

10.3.17

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Air quality is a concern in the area due to pollution from traffic. The redevelopment of Earl's Court Exhibition Centre and the wider Earl's Court site provide opportunities for low or carbon neutral developments and to establish a district heat and energy source⁽¹¹³⁾.

10.4 Delivery

Development Management

10.4.1

Development Management Policies to implement the actions identified above are found in Chapters 30-36, and referenced by footnotes in the text above. However, in making a planning decision, it is often necessary to weight different policies against one another in a particular case. The Vision set out for Earl's Court guides that decision making process but to ensure the place shaping role is given due weight within the planning process, a place shaping policy for Earl's Court is required.

Policy CP 9

Earl's Court

The Council will ensure an attractive 'urban-village' environment in Earl's Court by supporting improvements to the public realm, pedestrian environment and open space and resisting proposals which prejudice the realisation of the full potential of opportunities in the area.

Quantum of Development

10.4.2

There are two strategic allocations in this place: Earl's Court and Warwick Road sites. Earl's Court is allocated for ~~a minimum of 1,000 dwellings (assuming redevelopment to predominantly residential use and subject to further capacity testing)~~ and ~~a minimum of 10,000m² of non-residential floorspace with potential commercial, office, retail, hotel and leisure uses~~. It is part of a wider site including land in the London Borough of Hammersmith and Fulham, where a further ~~7,000 – 9,000~~ homes may be built, giving ~~around 8,000 to 10,000 homes~~ across the wider Earl's Court ~~Regeneration Area, subject to capacity and masterplanning~~. ~~A Planning Framework Document for the wider Earl's Court Area will be prepared which will provide further more detailed guidance on development quantum~~. The Warwick Road sites are allocated for 1,700 homes overall. Within the Royal Borough, therefore, the Earl's Court area is expected to deliver ~~2,700~~ homes during the lifetime of this plan.

Infrastructure Needs

10.4.3

The following infrastructure⁽¹¹⁴⁾ is specifically required to deliver the vision for Earl's Court:

- affordable housing as part of residential requirement;
- community facilities provided as part of 100 West Cromwell Road development;
- ~~improvements to~~ the Earl's Court One-Way system;
- possible expansion of Abingdon Health Centre to accommodate growth;
- potential for improved public transport and pedestrian interchange;
- additional new public open space, including considering opportunities to create local biodiversity.

Future Plans and Documents

10.4.4

A Planning Framework Document for the wider Earl's Court Area will be prepared. ~~Given the strategic importance of the wider Earl's Court Area in terms of London-wide regeneration and development objectives, it is likely that the Planning Framework will be prepared by the GLA in collaboration with the~~ London Borough of Hammersmith and Fulham and the Royal Borough,

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key authorities and landowners. The Planning Framework will provide further more detailed guidance on development quantum, land use and the potential for a town centre designation.

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Monitoring

10.4.5

The policies highlighted in footnotes under each 'Priorities for Actions' to deliver the vision for Earl's Court are monitored in accordance with the output indicators identified in Chapter 38.

10.4.6

In addition, the following output indicators will be used to monitor the delivery of the vision for Earl's Court:

1. Is progress being made in relation to delivery of the 2,700 new homes within the Royal Borough?
2. Has the one-way system been improved?
3. Have significant cultural/destination uses been retained in Earl's Court?
4. Have streetscape and pedestrian improvements to Cromwell Road, Warwick Road and Earl's Court Road been done?
5. Has the redevelopment been connected to a district heat and energy source or enabled for connection?

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Chapter 10 Earl's Court

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By improving the one-way system and improving the pedestrian environment, the western edge of the Borough will be reintegrated and Earl's Court town centre will be able to blossom,

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The Council will also consider the potential for improved accessibility from the West London Line to the underground network⁽¹⁰²⁾.

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Most of the area falls within conservation areas and there are a number of listed buildings, including Earl's Court Station, and St. Cuthbert's Church in Philbeach Gardens (Grade II*). Maintaining this legacy is important to the future success of Earl's Court⁽¹⁰³⁾.

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The redevelopment of the wider Earl's Court, West Kensington and North Fulham Regeneration Area provides an opportunity to create a legacy for the future⁽¹⁰⁴⁾. It also offers the potential for regeneration of both North End Road, located within the London Borough of Hammersmith and Fulham, and of Earl's Court district centre in the Royal Borough.

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Earl's Court Town Centre provides local shops and community services to local residents, such as health care and a post office. The Council recognises the importance of this shopping centre to cater for local needs and will work to improve it⁽¹⁰⁷⁾. Community facilities will be provided as part of the developments at 100 West Cromwell Road and the Warwick Road sites, including a new primary school at the northern end of Warwick Road. The Council will support the Primary Care Trust's ambition for better health facilities within the Earl's Court Town Centre⁽¹⁰⁸⁾.

10.3.11

Facilitating the connection of any redevelopment of the wider Earl's Court Regeneration Area to the Earl's Court Town Centre is important in realising the regenerative potential of the scheme. The Earls Court Regeneration Area itself will be designated a new town centre, with its location and status to be refined through the production of a Planning Framework.

Diversity of Housing

10.3.12

Earl's Court should have a diverse housing tenure. There are significant new housing projects at 100 West Cromwell Road alongside Tesco, and further north in Warwick Road. Guidelines have been prepared for these sites. In addition, over the Earl's Court, West Kensington and North Fulham Regeneration Area it may be possible to achieve between 8,000 to 10,000 new dwellings, subject to capacity and masterplanning. Establishing the exact capacity is dependant on further detailed work relating to transportation accessibility and masterplanning, including work undertaken at the London Plan Review level in relation to the Opportunity Area⁽¹⁰⁹⁾ and the Planning Framework Document for the wider Earl's Court Area being prepared.

An Engaging Public Realm

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Earl's Court Road is in need of improvement, including new shop frontages, better building maintenance and a reduction and rationalisation of street clutter.

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10.3.16

Brompton Cemetery, which is a Grade I Registered Park and Garden of Historic interest, is open to the public for wider quiet recreational use and provides a good pedestrian link from Brompton Road to the Fulham Road. There will be further provision of public open space as part of the Warwick Road development. Moreover, the wider Earl's Court Regeneration Area will provide publicly accessible open and play space to provide for new residents and address existing deficiencies⁽¹¹²⁾ through playable open space and facilities.

Respecting Environmental Limits

10.3.17

Air quality is a concern in the area due to pollution from traffic. The redevelopment of Earl's Court Exhibition Centre and the wider Earl's Court site provide opportunities for low or carbon neutral developments and to establish a district heat and energy source⁽¹¹³⁾.

10.4 Delivery

Development Management

10.4.1

Development Management Policies to implement the actions identified above are found in Chapters 30-36, and referenced by footnotes in the text above. However, in making a planning decision, it is often necessary to weight different policies against one another in a particular case. The Vision set out for Earl's Court guides that decision making process but to ensure the place shaping role is given due weight within the planning process, a place shaping policy for Earl's Court is required.

Policy CP 9

Earl's Court

The Council will ensure an attractive 'urban-village' environment in Earl's Court by supporting improvements to the public realm, pedestrian environment and open space and resisting proposals which prejudice the realisation of the full potential of opportunities in the area.

Quantum of Development

10.4.2

There are two strategic allocations in this place: Earl's Court and Warwick Road sites. Earl's Court is allocated for a minimum of 1000 dwellings (assuming redevelopment to predominantly residential use and subject to further capacity testing) and a minimum of 10,000m² of non-residential floorspace with potential commercial, office, retail, hotel and leisure uses. It is part of a wider site including land in the London Borough of Hammersmith and Fulham, where a further 7,000 – 9,000 homes may be built, giving around 8000 to 10,000 homes across the wider Earl's Court Regeneration Area, subject to capacity and masterplanning. A Planning Framework Document for the wider Earl's Court Area will be prepared which will provide further more detailed guidance on development quantum. The Warwick Road sites are allocated for 1,700 homes overall. Within the Royal Borough, therefore, the Earl's Court area is expected to deliver 2,700 homes during the lifetime of this plan.

Infrastructure Needs

10.4.3

The following infrastructure⁽¹¹⁴⁾ is specifically required to deliver the vision for Earl's Court:

- affordable housing as part of residential requirement;
- community facilities provided as part of 100 West Cromwell Road development;
- improvements to the Earl's Court One-Way system;
- possible expansion of Abingdon Health Centre to accommodate growth;
- potential for improved public transport and pedestrian interchange;
- additional new public open space, including considering opportunities to create local biodiversity.

Future Plans and Documents

10.4.4

A Planning Framework Document for the wider Earl's Court Area will be prepared. Given the strategic importance of the wider Earl's Court Area in terms of London-wide regeneration and development objectives, it is likely that the Planning Framework will be prepared by the GLA in collaboration with the London Borough of Hammersmith and Fulham and the Royal Borough,

key authorities and landowners. The Planning Framework will provide further more detailed guidance on development quantum, land use and the potential for a town centre designation.

Monitoring

10.4.5

The policies highlighted in footnotes under each 'Priorities for Actions' to deliver the vision for Earl's Court are monitored in accordance with the output indicators identified in Chapter 38.

10.4.6

In addition, the following output indicators will be used to monitor the delivery of the vision for Earl's Court:

1. Is progress being made in relation to delivery of the 2,700 new homes within the Royal Borough?
2. Has the one-way system been improved?
3. Have significant cultural/destination uses been retained in Earl's Court?
4. Have streetscape and pedestrian improvements to Cromwell Road, Warwick Road and Earl's Court Road been done?
5. Has the redevelopment been connected to a district heat and energy source or enabled for connection ?

26 Earl's Court

26.1 Introduction

26.1.1

This site lies on the western boundary of the Borough, bordering the London Borough of Hammersmith and Fulham, adjacent to the West London Line.

26.1.2

Earl's Court is located in chapter 10 of the Core Strategy: Earl's Court Place. For *Earl's Court Place*, the Strategic Objectives of the Plan as a whole include the following priorities: Better Travel Choices, Renewing the Legacy and Fostering Vitality, Keeping Life Local, Diversity of Housing, an Engaging Public Realm and Respecting Environmental Limits.

Why the site is of strategic importance to the Borough

26.1.3

The site is of strategic importance because of its size and its current pan-London function as an exhibition centre. The aim of this site is to provide a mixed-use development which will include residential, employment, and other uses. The Earl's Court Site falls within the Earl's Court, West Kensington and North Fulham Regeneration Area which includes sites in the London Borough of Hammersmith and Fulham. A scheme for the whole Regeneration Area will be encouraged to provide a strong mix of development with the economies of scale to create a vibrant new urban quarter and Town Centre.

26.2 Allocation

26.2.1

It is clear that the site has considerable potential. This is reflected in the Greater London Authority (GLA) designating Earl's Court & West Kensington an Opportunity Area in the Revised London Plan⁽²⁶³⁾. Within the Royal Borough it is anticipated the scheme will be residential-led, but the exact disposition of uses and full capacity of the site which might be in excess of these figures, should be considered as part of the spatial planning of the site as a whole, through a Planning Framework Document for the wider Earl's Court Area. Given the strategic importance of the wider Earl's Court Area in terms of London-wide regeneration and development objectives, it is likely that the Planning Framework will be prepared by the GLA in collaboration with the London Borough of Hammersmith and Fulham and the Royal Borough, and landowners. The Planning Framework will provide further more detailed guidance on development quantum, land use and the status of the new town centre designation.

26.2.2

By bringing together this site, a comprehensive mixed-use scheme can be achieved on the wider Earl's Court site which is also part of the London Borough of Hammersmith and Fulham, to provide housing, employment, hotels, leisure, offices and associated facilities. There should be new educational, health and community facilities, with shops including day-to-day needs and to complement existing facilities of the Earl's Court, West Kensington and North Fulham Regeneration Area. New public open space should be provided.

26.2.3

Key to the long term success of the area is the redevelopment of the Exhibition Centre. Until a redevelopment occurs, the Exhibition Centre will be supported including initiatives to improve access and servicing facilities. Earl's Court has a long-standing role as an important cultural destination of London. New cultural/destination facilities are required. Significant cultural uses should be provided in the wider Earl's Court Regeneration Area, to continue the long tradition of some form of cultural destination. It is expected this will be in the locus of Earl's Court. The location of any cultural or destination uses or attractions will be determined through the Planning Framework Document which is likely to be prepared by the GLA, in collaboration with the Royal Borough, the London Borough of Hammersmith and Fulham and the landowners.

26.2.4

The on-site road pattern and connections must be designed with regard to seeking to improve traffic circulation in the surrounding area, and on primary routes in the London Borough of Hammersmith and Fulham and the Royal Borough, such that it helps enables the delivery of the improvement of the One Way System, for which initial feasibility work has already been undertaken. No funding for this project is at present allocated by Transport for London. The

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Royal Borough will therefore work in partnership with Transport for London amongst others regarding its potential delivery, subject to feasibility and viability.

26.2.5

It will be necessary to deck over the TfL depot and West London Line in multiple locations to allow for good connections. There may also be scope to build over the railway to increase the development capacity of the site. While the accessibility of the site is high, with good tube and rail networks, the quantity of development of different land uses, the capacity of these networks and the road network to absorb further growth, and the identification of deliverable improvements in the transport infrastructure needs, further research, in the context of a full Transport Assessment.

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26.2.6

Transport for London and the Greater London Authority (GLA) are partners in the planning and delivery of the future development in the wider Earl's Court site. The Council will work in partnership with them to overcome transport constraints on the development, whilst safeguarding the operational railway.

26.2.7

The redevelopment of the Earl's Court, West Kensington and North Fulham Regeneration Area provides an opportunity to create a legacy for the future. It also offers the potential for regeneration of both North End Road, located within the London Borough of Hammersmith and Fulham, and Earl's Court local centre in the Royal Borough. A comprehensive mixed-use scheme should be carefully planned to ensure this potential is achieved.

26.2.8

High-density development is appropriate for this highly-accessible location. Design should reflect the strategic role of the site and also take account avoiding significant adverse effects on existing residential areas through overshadowing and microclimatic changes.

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26.2.9

On-site waste management facilities will be required as part of the wider Earls Court Regeneration Area to handle waste arising from the new uses of the site (this could include recycling facilities and/or anaerobic digestion). This facility will help towards the Borough's waste apportionment figure set out in the London Plan.

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26.2.10

The scale of development and the mix of uses is also a good opportunity for the provision of low or carbon neutral developments and the establishment of a district heat and energy source or connection.

26.2.11

A grade I Registered Park and Garden of Historic Interest has been identified to the south west of the site and therefore development round this site should be carefully managed. Ways to create local biodiversity should be considered across the wider Earls Court Regeneration Area.

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26.2.12

Flood risk of this site needs to be considered as it is located in Flood Risk Zones 2 and 3. This site has passed the sequential test as required by Planning Policy Statement 25 "Development and Flood Risk". The exception test would have to be undertaken.

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Policy CA 7

Earl's Court

Allocation for Earl's Court

The Council allocates development on the site to deliver, in terms of:-

Land use allocation within the Royal Borough:

- a. a minimum of 1000 homes within the Royal Borough;

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b. a minimum of 10,000m² (108,000 ft²) of non-residential floorspace including office, commercial, hotel and leisure floor space plus retail and associated uses (within the A Classes of the Use Classes Order 1987 (as amended))-including serving the needs of the new development;

Further land uses sought (applicable to the site within the Royal Borough and/or the wider Earls Court Regeneration Area subject to masterplanning):

c. cultural/destination uses or attractions to retain Earls Court's long-standing role as an important cultural destination within the locus of Earls Court;

d. on-site waste management facilities to handle waste arising from the new uses of the site (this could include recycling facilities and/or anaerobic digestion);

e. low or carbon neutral developments and, subject to feasibility, Combined Cooling, Heating and Power (CCHP) plant or similar, of a suitable size to serve the site with the potential to contribute to the heat and energy demand of the wider community as part of a district heat and energy network;

Principles (applicable to the site within the Royal Borough and/or the wider Earls Court Regeneration Area subject to masterplanning):

f. a new urban quarter which links well with its surroundings, especially to the west and east;

g. a design of the on-site road pattern and connections which helps improve traffic circulation in the surrounding area, and on primary routes in the London Borough of Hammersmith and Fulham and the Royal Borough, providing a key component in facilitating the improvement of the Earls Court One Way System;

h. inclusion of an open urban square to Warwick Road frontage together with associated social and community uses;

Infrastructure and Planning Obligations (applicable to the site within the Royal Borough and/or the wider Earls Court Regeneration Area as appropriate):

i. community and health facilities;

j. additional new public open space, including considering opportunities to create local biodiversity;

k. securing highway contributions including measures to facilitate the improvement of the Earls Court One-Way system;

l. improvements to tube and rail access, including accessibility from the West London Line to the underground network;

m. improved pedestrian links from the site and the surrounding area, to public transport facilities;

n. affordable housing as part of residential requirement;

o. education facilities;

p. other contributions as identified in the Royal Borough's Planning Obligations Supplementary Planning Document and the wider Earls Court Regeneration Area Planning Framework Document.

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26.3 Delivery

Risks

26.3.1

There are no 'high' risks identified for the delivery of this site. Two 'medium' risks have, however, been identified. First, the fact that any cultural/destination uses require too high a cross-subsidy from the development and second, the improvements to the one-way system. The delivery of both the cultural/destination uses and the improvements to the one-way system will require the necessary feasibility and viability studies to be undertaken. ⁽²⁶⁴⁾

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Related site specific Planning Framework planned or prepared

26.3.2

A Planning Framework Document will be produced. Given the strategic importance of the wider Earls Court Regeneration Area in terms of London-wide regeneration and development objectives, it is likely that the Planning Framework will be prepared by the GLA, in collaboration with the Royal Borough, the London Borough of Hammersmith and Fulham and the landowners. This document will provide a framework for a coordinated and phased development of the Earl's Court site and land in Hammersmith and Fulham. It will provide more detailed guidance on quantum, land use and the status of the new town centre designation.

Delivery agency

26.3.3

Capital and Counties Plc. Other delivery agencies unknown at this stage.

Delivery milestones

26.3.4

The delivery milestones are:

- 2009: agree scope and arrangements for preparation of a Planning Framework Document with the GLA, the London Borough of Hammersmith and Fulham and the landowners;
- 2009-2011: preparation of the Planning Framework Document;
- 2012: grant planning permission;
- 2013: start implementation on site;
- 2023: completion.

Funding arrangements

26.3.5

Mainly private investment.

26.4 Site Information

Site address

26.4.1

The sites address are:

- Earl's Court Exhibition Centre, Warwick Road;
- Land in Cluny Mews;
- Land located between the railway line and the rear of Philbeach Gardens;
- The site extends into the neighbouring borough of Hammersmith and Fulham.

Ward

26.4.2

Earl's Court.

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Site area

26.4.3

The site area is 7.43 hectares (18.36 acres). The wider Earl's Court site as a whole extends into the London Borough of Hammersmith and Fulham and covers an area of approximately 27 hectares (67 acres).

Site owners

26.4.4

Earl's Court Limited (the Exhibition Centre site), Clear Channel, [Transport for London](#) and Empress Limited (Cluny Mews). The Earl's Court, West Kensington and North Fulham Regeneration Area which extends into the London Borough of Hammersmith and Fulham includes further ownerships including Network Rail and the London Borough of Hammersmith and Fulham.

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Current uses

26.4.5

Within the Royal Borough of Kensington and Chelsea: Exhibition Centre and associated ancillary uses (D1), and offices (Class B1).

26.4.6

The Earl's Court, West Kensington and North Fulham Regeneration Area include a range of other uses such as Exhibition Centre and associated ancillary uses (D1), residential (C3), offices (B1) and shops (A1) amongst others.

Existing permissions

26.4.7

None. The Earl's Court One Exhibition Centre has a Certificate of Immunity from Listing which expires in 2012.

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26 Earl's Court

26.1 Introduction

26.1.1

This site lies on the western boundary of the Borough, bordering the London Borough of Hammersmith and Fulham, adjacent to the West London Line.

26.1.2

Earl's Court is located in chapter 10 of the Core Strategy: Earl's Court Place. For *Earl's Court Place*, the Strategic Objectives of the Plan as a whole include the following priorities: Better Travel Choices, Renewing the Legacy and Fostering Vitality, Keeping Life Local, Diversity of Housing, an Engaging Public Realm and Respecting Environmental Limits.

Why the site is of strategic importance to the Borough

26.1.3

The site is of strategic importance because of its size and its current pan-London function as an exhibition centre. The aim of this site is to provide a mixed-use development which will include residential, employment, and other uses. The Earl's Court Site falls within the Earl's Court, West Kensington and North Fulham Regeneration Area which includes sites in the London Borough of Hammersmith and Fulham. A scheme for the whole Regeneration Area will be encouraged to provide a strong mix of development with the economies of scale to create a vibrant new urban quarter and Town Centre.

26.2 Allocation

26.2.1

It is clear that the site has considerable potential. This is reflected in the Greater London Authority (GLA) designating Earl's Court & West Kensington an Opportunity Area in the Revised London Plan⁽²⁶³⁾. Within the Royal Borough it is anticipated the scheme will be residential-led, but the exact disposition of uses and full capacity of the site which might be in excess of these figures, should be considered as part of the spatial planning of the site as a whole, through a Planning Framework Document for the wider Earl's Court Area. Given the strategic importance of the wider Earl's Court Area in terms of London-wide regeneration and development objectives, it is likely that the Planning Framework will be prepared by the GLA in collaboration with the London Borough of Hammersmith and Fulham and the Royal Borough, and landowners. The Planning Framework will provide further more detailed guidance on development quantum, land use and the status of the new town centre designation.

26.2.2

By bringing together this site, a comprehensive mixed-use scheme can be achieved on the wider Earl's Court site which is also part of the London Borough of Hammersmith and Fulham, to provide housing, employment, hotels, leisure, offices and associated facilities. There should be new educational, health and community facilities, with shops including day-to-day needs and to complement existing facilities of the Earl's Court, West Kensington and North Fulham Regeneration Area. New public open space should be provided.

26.2.3

Key to the long term success of the area is the redevelopment of the Exhibition Centre. Until a redevelopment occurs, the Exhibition Centre will be supported including initiatives to improve access and servicing facilities. Earl's Court has a long-standing role as an important cultural destination of London. New cultural/destination facilities are required. Significant cultural uses should be provided in the wider Earl's Court Regeneration Area to continue the long tradition of some form of cultural destination. It is expected this will be in the locus of Earl's Court. The location of any cultural or destination uses or attractions will be determined through the Planning Framework Document which is likely to be prepared by the GLA, in collaboration with the Royal Borough, the London Borough of Hammersmith and Fulham and the landowners.

26.2.4

The on-site road pattern and connections must be designed with regard to seeking to improve traffic circulation in the surrounding area, and on primary routes in the London Borough of Hammersmith and Fulham and the Royal Borough, such that it helps enables the delivery of the improvement of the One Way System, for which initial feasibility work has already been undertaken. No funding for this project is at present allocated by Transport for London. The Royal Borough will therefore work in partnership with Transport for London amongst others regarding its potential delivery, subject to feasibility and viability.

26.2.5

It will be necessary to deck over the TfL depot and West London Line in multiple locations to allow for good connections. There may also be scope to build over the railway to increase the development capacity of the site. While the accessibility of the site is high, with good tube and rail networks, the quantity of development of different land uses, the capacity of these networks and the road network to absorb further growth, and the identification of deliverable improvements in the transport infrastructure needs further research, in the context of a full Transport Assessment.

26.2.6

Transport for London and the Greater London Authority (GLA) are partners in the planning and delivery of the future development in the wider Earl's Court site. The Council will work in partnership with them to overcome transport constraints on the development, whilst safeguarding the operational railway.

26.2.7

The redevelopment of the Earl's Court, West Kensington and North Fulham Regeneration Area provides an opportunity to create a legacy for the future. It also offers the potential for regeneration of both North End Road, located within the London Borough of Hammersmith and Fulham, and Earl's Court local centre in the Royal Borough. A comprehensive mixed-use scheme should be carefully planned to ensure this potential is achieved.

26.2.8

High-density development is appropriate for this highly-accessible location. Design should reflect the strategic role of the site and also take account avoiding significant adverse effects on existing residential areas through overshadowing and microclimatic changes.

26.2.9

On-site waste management facilities will be required as part of the wider Earls Court Regeneration Area to handle waste arising from the new uses of the site (this could include recycling facilities and/or anaerobic digestion). This facility will help towards the Borough's waste apportionment figure set out in the London Plan.

26.2.10

The scale of development and the mix of uses is also a good opportunity for the provision of low or carbon neutral developments and the establishment of a district heat and energy source or connection.

26.2.11

A grade I Registered Park and Garden of Historic Interest has been identified to the south west of the site and therefore development round this site should be carefully managed. Ways to create local biodiversity should be considered across the wider Earls Court Regeneration Area.

26.2.12

Flood risk of this site needs to be considered as it is located in Flood Risk Zones 2 and 3. This site has passed the sequential test as required by Planning Policy Statement 25 "Development and Flood Risk". The exception test would have to be undertaken.

Policy CA 7

Earl's Court

Allocation for Earl's Court

The Council allocates development on the site to deliver, in terms of:-

Land use allocation within the Royal Borough:

- a. a minimum of 1000 homes within the Royal Borough;
- b. a minimum of 10,000m² (108,000 ft²) of non-residential floorspace including office, commercial, hotel and leisure floor space plus retail and associated uses (within the

A Classes of the Use Classes Order 1987 (as amended)) including serving the needs of the new development.

Further land uses sought (applicable to the site within the Royal Borough and/or the wider Earls Court Regeneration Area subject to masterplanning):

- c. cultural/destination uses or attractions to retain Earl's Court's long-standing role as an important cultural destination within the locus of Earl's Court;
- d. on-site waste management facilities to handle waste arising from the new uses of the site (this could include recycling facilities and/or anaerobic digestion);
- e. low or carbon neutral developments and, subject to feasibility, Combined Cooling, Heating and Power (CCHP) plant or similar of a suitable size to serve the site with the potential to contribute to the heat and energy demand of the wider community as part of a district heat and energy network;

Principles (applicable to the site within the Royal Borough and/or the wider Earls Court Regeneration Area subject to masterplanning):

- f. a new urban quarter which links well with its surroundings, especially to the west and east;
- g. a design of the on-site road pattern and connections which helps improve traffic circulation in the surrounding area, and on primary routes in the London Borough of Hammersmith and Fulham and the Royal Borough, providing a key component in facilitating the improvement of the Earl's Court One Way System;
- h. inclusion of an open urban square to Warwick Road frontage together with associated social and community uses;

Infrastructure and Planning Obligations (applicable to the site within the Royal Borough and/or the Wider Earls Court Regeneration Area as appropriate):

- i. community and health facilities;
- j. additional new public open space, including considering opportunities to create local biodiversity;
- k. securing highway contributions including measures to facilitate the improvement of the Earl's Court One-Way system;
- l. improvements to tube and rail access, including accessibility from the West London Line to the underground network;
- m. improved pedestrian links from the site and the surrounding area, to public transport facilities;
- n. affordable housing as part of residential requirement;
- o. education facilities;
- p. other contributions as identified in the Royal Borough's Planning Obligations Supplementary Planning Document and the wider Earls Court Regeneration Area Planning Framework Document.

26.3 Delivery

Risks

26.3.1

There are no 'high' risks identified for the delivery of this site. Two 'medium' risks have, however, been identified. First, the fact that any cultural/destination uses require too high a cross-subsidy from the development and second, the improvements to the one-way system. The delivery of both the cultural/destination uses and the improvements to the one-way system will require the necessary feasibility and viability studies to be undertaken. ⁽²⁶⁴⁾ . .

Related site specific Planning Framework planned or prepared

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Delivery agency

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Capital and Counties Plc. Other delivery agencies unknown at this stage.

Delivery milestones

26.3.4

The delivery milestones are:

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- 2009-2011: preparation of the Planning Framework Document;
- 2012: grant planning permission;
- 2013: start implementation on site;
- 2023: completion.

Funding arrangements

26.3.5

Mainly private investment.

26.4 Site Information

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26.4.2

Earl's Court.

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Existing permissions

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