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Foreword

The Earl's Court and West Kensington Opportunity Area is one of the few remaining large development sites, close to central London, which has the potential to bring economic opportunity, new homes and new jobs on a grand scale.

The area has gone through significant change over the years. A collection of orchards and brickfields were replaced by a transport depot and coal yard. Then the area grew to become an internationally recognised exhibition venue, as well as home to over 1,500 people and an important element in London’s transport infrastructure.

Over recent years the London Borough of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea and the Greater London Authority have come together to investigate the potential for the redevelopment of the Earl’s Court Exhibition Centres. No one underestimates the contribution that the exhibition centres have made to the local economy; however, redevelopment could continue the Earl’s Court ‘brand’ by creating a new vibrant cultural destination, as part of a new mixed use quarter which will provide new benefits to the local community, such as new businesses, shopping and employment opportunities.

Looking beyond the exhibition centres, in Hammersmith and Fulham the site of the Transport for London depot and the West Kensington and Gibbs Green housing estates offer huge potential for a comprehensive approach to redevelopment. This approach provides opportunities to re-house residents in better accommodation and build thousands of new homes, many of which will be affordable to those on low and middle incomes.

New infrastructure will be necessary to support the new population, including new roads, buses and improvements to the local stations, as well as a range of social and community facilities.

We have the chance to create a truly inspiring new urban quarter through the redevelopment of the Earl’s Court and West Kensington Opportunity Area. Comprehensive redevelopment of the area presents a fantastic opportunity to improve connections between communities that are currently severed by the railway infrastructure and exhibition centres.
Foreword

The challenge to developers is to create buildings and spaces which will stand the test of time. The area is surrounded by nineteen conservation areas, several important listed buildings and Brompton Cemetery, a Grade 1 listed historic park and Garden. We want to develop a quarter worthy of this setting.

This planning framework is a major step towards creating a successful new place in Earl’s Court where people want to live, work and visit. We have therefore been careful to place people at the centre of its creation. The input and careful consideration of many local residents and businesses has been invaluable. We hope that you, like us, are excited about what this area will be like in the future.

Stephen Greenhalgh
Leader, the London Borough of Hammersmith and Fulham

Sir Merrick Cockell
Leader, the Royal Borough of Kensington and Chelsea
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INTRODUCTION
### Status of this Document

1•1 This document is a Supplementary Planning Document (hereafter referred to as SPD), providing supplementary detail to policies contained within the London Borough of Hammersmith and Fulham’s (hereafter referred to as ‘LBHF’) Core Strategy (2011) and the Royal Borough of Kensington and Chelsea’s (hereafter referred to as ‘RBKC’) Core Strategy (2010). It also provides supplementary detail to the Mayor of London’s London Plan (2011) in the form of Supplementary Planning Guidance (hereafter referred to as SPG). The SPD should be read in conjunction with the Mayor’s London Plan, the borough Core Strategies and other relevant Development Plan Documents and SPDs.

1•2 This SPD is a material consideration for the determination of any planning applications submitted within the OA.

1•3 This SPD has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), the Planning and Compulsory Purchase Act 2004 (as amended), the Greater London Authority Acts 1999 and 2007 and Planning Policy Statement 12: Local Spatial Planning. This document is supported by a Sustainability Appraisal, an Equality Impact Assessment, a Statement of Consultation, an Adoption Statement and the Consultation Summary Report.

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1 Please note that the Mayor of London is unable to endorse this planning framework as an SPG to the London Plan during the Mayoral pre-election period. Should the Mayor subsequently choose to adopt this document as an SPG to the London plan, this document will need to be revised to include the Mayor of London’s signature and logo and reference to the document being ‘subject to endorsement by the Mayor’ and this paragraph will be removed.
Chapter 1 | Introduction

Figure 1.2: Aerial photograph of the OA
Purpose of this Document

1.4 This document has been produced in partnership between LBHF, RBKC and the Greater London Authority (hereafter referred to as ‘GLA’) (the ‘authorities’). The overall objectives of this SPD are to:

- establish detailed guidance on the application of policies within the London Plan and the boroughs’ Development Plan Documents (DPDs) that will be used to assess any planning applications in the OA;
- establish and provide guidance for masterplanning within the OA;
- bring forward partnership working in redeveloping the OA and maximise public and private resources in regeneration; and
- engage all interested stakeholders as early as possible in the development process.

1.5 Figure 1.3 illustrates the agreed boundary of the OA. The OA is identified by description in Annex I of the London Plan (2011) which states that “the area presents a significant opportunity for regeneration comprising estate renewal and housing and employment growth”.

1.6 Capital and Counties (Capco) own the freehold for Seagrave Road car park, are joint owner of the Empress State Building and have a lease on the Earl's Court Exhibition Centres. Transport for London (TfL), who own the freehold to the Lillie Bridge Depot and the land upon which the exhibition halls sit (subject to long leases to Capco), are actively collaborating with adjacent landowners to include their land within the wider redevelopment proposals, as are LBHF, who own the freehold for the West Kensington and Gibbs Green housing estates.

1.7 It is recognised that, more than ever in this current time of economic uncertainty, flexibility will be needed to achieve the authorities' strategic vision of comprehensive redevelopment, as reflected in Key Principles HO1 and PS1. This SPD is not intended to eliminate or constrain other acceptable development and/or strategies for achieving sustainable comprehensive regeneration in accordance with relevant London Plan and Core Strategy policies. The SPD has been drafted with this flexibility in mind, such that it can be applied to any application coming forward in the OA.
Purpose of this Document

Policy Context

1.8 The entire site is identified in the London Plan as an Opportunity Area. In addition, the Core Strategies for LBHF and RBKC both contain planning policies specific to development in the OA. Together, these policies require a minimum of 7,000 jobs and 4,000 homes in a comprehensive residential led mixed use development that includes offices, retail, social and community facilities and a significant cultural destination. These policies also require improved east-west connectivity through the OA and development to uphold and promote the distinctive townscape and range of heritage assets in the area. The policies are reproduced in full in the Appendix.

1.9 In addition to these OA specific planning policies, there are also theme based national, regional and local planning policies which apply to any redevelopment of the OA. The Mayor of London has other theme based Supplementary Planning Guidance (such as the Mayor’s draft Housing SPG (2011)). These documents include guidance on applying the Mayor’s density matrix to large sites. Both boroughs also have theme based Supplementary Planning Documents (such as Noise / Air Quality SPDs in RBKC) which also apply to redevelopment of the OA.
Structure of the Document

1.10 This SPD comprises of the following chapters:

1.11 1: INTRODUCTION. Introduces the SPD, setting out its status and purpose and the timetable for its adoption.

1.12 2: SITE CONTEXT. Sets the scene for the OA as it is today, by describing the spatial, social and historical context for the area.

1.13 3: VISION AND OBJECTIVES. Sets out the Vision and Key Objectives to guide development in the OA.

1.14 4: URBAN FORM STRATEGY. Establishes the Key Objectives for the urban form of the OA and provides Key Principles setting out how they could be achieved.

1.15 5: HOUSING STRATEGY. Sets out the requirements for housing provision in the OA, in particular in terms of any estate regeneration proposals, tenure mix and unit size mix.

1.16 6: EMPLOYMENT STRATEGY. Sets out the requirements for office provision and local job creation and training in the OA.

1.17 7: RETAIL STRATEGY. Sets out the requirements for retail provision within the OA.

1.18 8: CULTURE STRATEGY. Sets out the requirements to create a cultural destination that retains Earl’s Court’s cultural ‘brand’.

1.19 9: SOCIAL AND COMMUNITY FACILITIES STRATEGY. Sets out the requirements for the provision of social and community facilities, such as education (secondary, primary and nursery), health, leisure and sports provision, policing facilities, library provision and community meeting spaces.

1.20 10: TRANSPORT AND ACCESSIBILITY STRATEGY. Sets out the necessary improvements to the transport infrastructure to accommodate development, including walking, cycling, public transport and traffic.

1.21 11: ENERGY STRATEGY. Sets out requirements for development to reduce carbon dioxide emissions and deliver energy sustainability.

1.22 12: ENVIRONMENTAL STRATEGY. Outlines requirements relating to climate change, flood risk and water management, land contamination, waste, demolition and construction, land contamination, air pollution, noise pollution and ecology.

1.23 13: PHASING AND SECTION 106 STRATEGY. Sets out the required contributions from development and when, where known, these contributions should be delivered.

1.24 POLICY CONTEXT APPENDIX. Provides the current planning policy context in relation to the OA, as set out in the Mayor’s London Plan (2011), RBKC’s Core Strategy (2010) and LBHF’s Core Strategy (2011).
1.25 Chapters 4 to 12 all follow a similar structure, based on the following diagram:

**WHAT?**
Redevelopment of the OA will be expected to meet each of the Key Objectives described in the SPD. Under each Key Objective there is also a number of Key Principles that will be used to assess development proposals in the OA.

**WHY?**
Each Key Objective and Key Principle has regard to the existing policy context, detailed character and context assessment, up to date evidence base and ongoing consultation findings.

**HOW?**
Under each Key Principle, the SPD then describes how it is to be delivered in development proposals.

Figure 1.4: Structure of the SPD chapters
Figure 1.5 summarises the timetable and key consultation stages in the preparation of this SPD. It also shows what supporting evidence has informed its production. A number of supporting evidence documents have been produced in order to inform this SPD. These can be found on the three authorities' websites and should be read alongside this SPD. A summary of each document is provided below:

1.26 **SUSTAINABILITY APPRAISAL.** Assesses the potential impacts of the document on a range of environmental, social and economic criteria.

1.27 **EQUALITY IMPACT ASSESSMENT.** Assesses the potential impacts of the document on a number of identified minority groups.

1.28 **STATEMENT OF CONSULTATION.** A statement setting out those consulted by the authorities in connection with the preparation of the SPD, how the consultations were carried out, a summary of the main issues raised in those consultations ("the Consultation Summary Report") and how the representations have been addressed in the SPD ("the Consultation Responses Schedule").

1.29 **TOWNSCAPE AND VISUAL ANALYSIS.** Is a study of the physical fabric of the area and townscape through the analysis of existing views towards the OA from observation points around the OA. The analysis assesses the setting of existing Conservation Areas’ skylines through an eye level visual assessment that identifies the key attributes and features in each view.

1.30 **CONSULTATION SUMMARY REPORT.** Provides a summary of the comments raised during consultation on the revised draft of the SPD.

1.31 **CONSULTATION RESPONSES SCHEDULE.** Sets out the comments received during consultation on the revised draft of the SPD and the officers' responses to these comments.

1.32 **CHARACTER AREA ANALYSIS.** Is a study of the local urban character of the OA and its surroundings.

1.33 **EDGES STUDY.** Is a study of the existing OA boundary edge conditions between the OA and properties which share its boundary.

1.34 **DEVELOPMENT CAPACITY SCENARIOS.** Sets out the three development capacity scenarios that were published in the first draft of the SPD. An illustrative Masterplan is provided for each and they are tested against the revised Key Objectives. They are followed by an alternative illustrative masterplan solution demonstrating a different approach to urban design that has the potential to meet all of the Key Objectives. Any masterplan images in this, or any other SPD document, do not and will not fix a design form and layout for the OA.

1.35 **EARL’S COURT AND WEST KENSINGTON OPPORTUNITY AREA OFFICE STUDY (2011).** Explores the potential for office floorspace within the OA.

1.36 **EARL’S COURT AND WEST KENSINGTON OPPORTUNITY AREA RETAIL NEED ASSESSMENT (2010).** Provides an assessment of retail need in the OA, looking specifically at retail capacity.

1.37 **EARL’S COURT AND WEST KENSINGTON OPPORTUNITY AREA ECOLOGICAL ASPIRATIONS STUDY (2010).** Assesses the ecological and habitat value of the OA and sets out several aspirations to protect and enhance ecology and habitat diversity in the OA.
SPD Timetable and Supporting Documentation

1•39 **DECENTRALISED ENERGY FEASIBILITY STUDY (2011).** This sets out the potential for decentralised energy in the OA and sets out the strategic framework for the development of a site-wide, low carbon, decentralised energy scheme in the OA.

1•40 **ESTATES REGENERATION ECONOMIC APPRAISAL (2011).** Provides a summary of the four options for intervention on the West Kensington and Gibbs Green estates.

1•41 **TRANSPORT STUDY REVIEW (2011).** This Summary Report outlines the findings of the Earl’s Court & West Kensington Strategic Transport Study (ECTS) and the independent review carried out by, and on behalf of TfL, LBHF and RBKC. The purpose of the review is to ensure that the ECTS and underlying analysis is acceptable to inform the SPD.

1•42 **VIABILITY REVIEW (2011).** Is a review that assessed the three development capacity scenarios (see para 1.47) above and assesses the viability of development at these three densities. The study was only accurate at the time it was undertaken in 2011 and any applications for development would need to be accompanied by their own viability assessments.

![Diagram of SPD Timetable and Supporting Documentation]

Figure 1.5: SPD timetable and supporting documentation
02 SITE CONTEXT
Overview

2.0 This chapter gives a broad overview of the physical, economic and social nature of the OA today. It is intended to provide the background information that will be needed to understand the rest of this SPD. This chapter is structured around four broad themes:

• strategic context;
• existing urban form and topographical conditions;
• existing land uses; and
• heritage assets.

2.1 The OA comprises 37.2 hectares of land split between LBHF and RBKC, incorporating land within the Earl’s Court Ward (RBKC), the North End Ward (LBHF) and the Fulham Broadway Ward (LBHF). The OA boundary is defined by Warwick Road and the West London Line to the east, West Cromwell Road (A4) to the north, North End Road to the west and Old Brompton Road/Lillie Road to the south.

2.2 The Seagrave Road car park is a parcel of land within the OA situated south of Lillie Road bounded by Seagrave Road and the West London Line. 27.8ha of the site is contained within LBHF and the remaining 9.4ha is contained within RBKC comprising the Earl’s Court 1 Exhibition Centre, some vacant land along the railway and some buildings associated with Clear Channel advertising.

Strategic Context

2.3 Figures 2.1 and 2.2 show the strategic context of the OA. The A4, along the north of the OA, is identified in the London Plan (2011) as the ‘western wedge’. The Mayor of London has aspirations that this wedge will develop into an important commercial corridor, linking London’s largest airport (Heathrow) and the two important commercial centres of The City and the West End.

2.4 The White City Opportunity Area, Park Royal Opportunity Area and Kensal Opportunity Area, all north of the OA, are likely to undergo significant regeneration or redevelopment over the next twenty years.
Strategic Context

Figure 2.2: The OA Strategic Context

Key
- River Thames
- A4
- Crossrail 1 and 2*
- West London Line
- Central Activities Zone (CAZ)
- High Speed 1 and 2
- The Earl's Court and West Kensington Opportunity Area (The OA)
Urban Form

2.5 The OA is dominated by the Empress State Building and Earl’s Court Exhibition Centres, which are major landmarks on the West London skyline. It is made up of large, impermeable land holdings that lack connections into the surrounding area. The built form, whilst mixed in terms of age and type, is characteristically different from that found in the surrounding areas. For example, many of the buildings in the OA are stand alone structures with large footprints, which create a very different environment from that created by the terraces and mansion blocks found in the surrounding area. This is illustrated in the plan in figure 2.4.

2.6 Furthermore, there are a number of significant barriers to movement within the OA. For example, the West London Line, which runs along the boundary between LBHF and RBKC, forms a physical barrier to movement from east to west and the A4 stops pedestrians who wish to pass from north to south.

2.7 The OA is surrounded by significant heritage assets, including 19 conservation areas, numerous listed buildings and Brompton Cemetery, which is a conservation area, the setting of listed buildings and monuments, a registered ‘park and garden’ of special historic interest (Grade I listed) and Metropolitan Open Land. For further detail, please see page 39.

2.8 Figure 2.3 illustrates the boundary of the OA and the current land ownerships within it. Capco own the freehold for both Seagrave Road car park and the Empress State Building and have a lease on the Earl’s Court Exhibition Centres. After the 2012 Olympics the Earl’s Court Exhibition Centres and the Seagrave Road car park sites are likely to be redeveloped. Transport for London (TfL) and LBHF are currently discussing the possibility of including land within their ownership within the redevelopment site.
Urban Form

Figure 2.4: Urban structure of the OA and its Surroundings
Heritage Assets

2.9 There are 19 conservation areas in and around the OA. One of these is Brompton Cemetery. It forms the setting of listed buildings, a registered ‘park and garden’ of special historic interest (Grade I listed) and is Metropolitan Open Land.

2.10 There are Character Profiles or Conservation Area Proposals Statements available for each of these conservation areas (with the exceptions of Walham Green, Turneville/Chesson and The Billings). These describe the special interest, character and appearance of each area and in many cases they also include constructive design guidelines to help to preserve or enhance them. Therefore, proposals for the OA will be expected to demonstrate due regard to these documents. Furthermore, in light of the significant heritage assets surrounding the OA, particular attention must be paid to Planning Policy Statement 5: Planning for the Historic Environment (2010).

2.11 The conservation areas in and around the OA are:

- Philbeach Conservation Area;
- Nevern Square Conservation Area;
- Earl’s Court Square Conservation Area;
- Earl’s Court Village Conservation Area;
- Courtfield Conservation Area;
- Brompton Cemetery;
- The Boltons Conservation Area;
- The Billings Conservation Area;
- Sedlescombe Conservation Area;
- Walham Grove Conservation Area;
- The Walham Green Conservation Area;
- Barons Court Conservation Area;
- Queens Club Gardens Conservation Area;
- Turneville/Chesson Conservation Area;
- Olympia and Avonmore Conservation Area;
- Dorcas Estate Conservation Area;
- Fitzgeorge and Fitzjames Conservation Area;
- The Gunter Estate Conservation Area; and
- The Edwardes Square/Scarsdale & Abingdon Conservation Area.
Heritage Assets

Figure 2.8: Surrounding conservation areas, listed buildings and Brompton Cemetery monuments
Historical Development

Earl's Court's Origins

2.12 The OA and its surroundings were once significant landholdings held by notable families such as the De Veres, the Copes, the Rich family and the Edwardes family. The name 'Earl's Court' has been in use since land ownership passed to the Rich family in 1614. The members of this family included the Earls of Warwick and Holland and their estate was governed from a manorial courthouse in the area.

2.13 The area had rural beginnings, as it once comprised of market gardens, brickfields, potteries and nurseries. Housing and other development commenced around the 1770s, following the development of Chelsea to the south.

2.14 The Counter’s Creek was one of the tributaries running into the River Thames from Kensal Green. Its alignment ran along what is now the West London Line. Since medieval times it functioned as a natural border, with few early crossings.

Early Development & Enterprises

2.15 One of the first development initiatives was the transformation of the Counter’s Creek into Kensington Canal in 1828. However, by the time it was complete the canal was already obsolete as the train had become the preferred mode of transporting freight. The West London Railway was developed in 1844, connecting the area with Clapham Junction. It had a chequered early history, closing due to insufficient patronage after 6 months, only to be re-opened solely to transport coal in 1845, then re-opening as a passenger service in 1863.

2.16 Brompton Cemetery was also an early development in the area. Its grounds were laid out in the 1830s and consecrated in 1840. It features a domed chapel at its southern end, reached by long colonnades and catacombs. The Cemetery was designed to give the feel of a large open air cathedral. It occupies 16.5 hectares of space and is owned and managed by The Royal Parks. It contains a number of Listed Monuments.

2.17 A significant tide of mostly residential development occurred between the 1860s and mid 1890s, which saw some 60 acres of land being redeveloped. Lillie Road and Fulham Palace Road represented the western edge of this new development in 1893.

2.18 Residential development in the Earl’s Court area was supported by the arrival of rail transport during this time. The District Line was the first to arrive, with West Brompton Station opening in 1866, Earl’s Court Station in 1871 and Fulham North End Station in 1874 (later to be re-named West Kensington Station). The Piccadilly Line opened in 1906 at Earl’s Court. The OA has long been the site of a rail depot and repair sheds (since the 1870s) and the distinctive crescent form of development at Philbeach Gardens and Eardley Crescent were informed by the curving rail tracks of the District and Piccadilly lines.

Figure 2.9: Map of the OA and its surroundings in the 1840s
Figure 2.10: Map of the OA and its surroundings in the 1870s
Figure 2.11: Map of the OA and its surroundings in the 1890s
Historical Development

The Exhibition Centres

2.19 Exhibitions and shows have taken place on the Earl's Court site since the 1880s. These were largely in the form of travelling shows. Temporary halls were built to accommodate them, and these were demolished and rebuilt in 1894 as the Empress Hall and the Empress Theatre.

2.20 Of note from these early exhibitions was the Earl's Court gigantic wheel, erected in 1895. At 300 feet high it was almost as big as the London Eye is today and its 40 wooden cabins carried 1,200 passengers at a time. Although it was widely popular it was demolished 12 years later.

2.21 Earl's Court Exhibition Centre 1 was completed in 1937. It was designed by American architect Charles Howard Crane, and was Europe’s biggest structure by volume spanning 250 feet. Its distinctive art deco facade fronted onto a generous forecourt at Warwick Road and still forms a recognisable feature today.

2.22 In 1991 Earl's Court Exhibition Centre 2 was completed. This facility is physically linked with Earl's Court Exhibition Centre 1 and is situated on part of the former Lillie Bridge.

Twentieth Century Development

2.23 The Twentieth Century saw the influence of the motorcar on development as well as the effect of the opening of Heathrow Airport on connections between the western periphery of London and its centre.

2.24 Lillie Road replaced Star Road and Greyhound Road as the main thoroughfare across Fulham when motorised buses were introduced in 1906. In 1957 West Cromwell Road Bridge was built, linking Talgarth Road with West Cromwell Road and creating a stronger connection between Central London and West London. This was strengthened further in 1961 with the construction of the Hammersmith Flyover.

2.25 The Empress State Building was completed in 1961, originally designed as a hotel. The building was renovated in 2003 and another three floors were added.

2.26 The Gibbs Green estate was built in 1961 and the West Kensington estate was built between 1972 and 1974.
Transport and Accessibility

2.27 The OA is a transport dominated site with a mix of transport infrastructure adjoining or running through and under it. These include the strategically important West Cromwell Road, which runs along the northern edge of the area and the Earl’s Court One Way System (ECOWS) which borders the area on the east (both are part of the Transport for London Road Network (TLRN). Below street level the West London Line (part of the London Overground Network) runs through the site, separating communities in Hammersmith and Fulham from those in Kensington and Chelsea, whilst around this are the London and Piccadilly lines. West Brompton is also served by the Overground network. The District line upgrade is planned to release some limited capacity. All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancements. In addition crowding will increase to over three people per square metre on all southbound services to West Brompton.

2.28 The local transport facilities play an important role in connecting Earl’s Court to the rest of London and the UK as a whole but at a local level they do create significant severance, which impacts on local quality of life and accessibility to goods, services and employment.

2.29 As is the case in most of London there is an extensive pedestrian footway network along existing local streets and roads. However there are some areas where the quality of this network discourages walking, with poor maintenance, excessive street clutter, inconvenient pedestrian crossings and an inappropriate balance between the needs of pedestrians and vehicles. This, along with the severance caused by the West London Line, the District line, the Earl’s Court Exhibition Centres, creates a barrier to north-south and particularly east-west pedestrian and cycle movement through the OA. This isolates the OA, reduces the attractiveness of walking and cycling and restricts access to local public transport. West Cromwell Road, running along the north side of the site, creates severance between the OA and the residential areas to the north.

2.30 Once off the busiest primary roads the majority of streets surrounding the OA represent a safe and attractive environment for pedestrians and cyclists, although the system of one-way local roads, designed to discourage vehicles from rat running, does cause inconvenience for cyclists and cycle parking facilities are inadequate.

2.31 The OA is served by three London Underground stations; Earls Court, West Brompton and West Kensington. These stations provide access to the District and Piccadilly lines. West Brompton is also served by the Overground network. The edges of the OA are thus well served with a high Public Transport Accessibility Level (PTAL), but the centre has a low PTAL of just 2.

2.32 The London Underground lines serving the OA are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly lines in the AM peak. Significant increases in capacity are planned and funded for the District and Piccadilly lines as part of the London Underground upgrades. The District line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is no definite date for the upgrade of the Piccadilly line, which would provide a capacity increase of 25%, although it is expected to be complete prior to 2031. Crossrail is planned to open in 2018, which will release capacity on the Central line, which in turn will draw passengers from the Piccadilly line, thereby releasing some limited capacity.

2.33 All the boundary roads carry very high levels of traffic and operate at, or near, capacity in the peak periods. The dominant traffic flows are east-west on West Cromwell Road (around 6,000 vehicles in the peak periods) and north-south on the ECOWS (around 2,000 southbound and 1,000 – 1,500 northbound). The majority of traffic signals in the area operate on the SCOOT system to better optimise junction capacity, although, given the dominance of
Transport and Accessibility

east-west traffic on the local road network, priority is given to this movement at the junctions along West Cromwell Road.

2.35 There are a significant number of traffic delay hotspots in and around the OA, including at all four corners of the site, during both peak periods as well as the weekend. This is particularly apparent at the West Cromwell Road junctions with Warwick Road and North End Road, the whole length of which is subject to delays. Delay is generally highest during the PM peak period, particularly on West Cromwell Road between the Warwick Road and Earl’s Court Road junctions.

2.36 Both West Cromwell Road and the ECOWS have negative impacts on the ease and attractiveness of pedestrian and cyclist movement, residential amenity, access to bus services and the townscape of the areas through which they run, including the OA.

2.37 The existing site includes 2,500 car parking spaces, primarily for the use of exhibitors and visitors to the Exhibition Centre although some public parking also takes place. On-street in Kensington and Chelsea there is a mixture of residents’ and pay and display parking with limited spare capacity. In Hammersmith and Fulham the available parking for visitors is greater because dual use parking bays are provided.
The OA has some very distinctive changes in ground levels, often as a result of the railway infrastructure. There is a significant change in ground level from the east of the OA to the west in order to provide clearance over the West London Line. The ground level is highest under Earl’s Court Exhibition Centre 1 where the Wimbledon Branch of the District Line passes underground. There is also a significant drop in level along the northern edge of the OA, from the A4 flyover in the north east to the traffic junction in the north west. The Ealing Broadway and Richmond branches of the District Line are contained within a steep cutting that runs alongside the northern boundary of the OA.
Topographical and Environmental Conditions

2.39 Much of the OA is located in an area of high flood risk (Flood Zone 3), as identified by the Environment Agency, and the area is susceptible to sewer/stormwater and potentially surface water flooding. Figure 2.17 illustrates the flood risk zones in the area.

2.40 The OA is also within an Air Quality Management Area and currently includes some areas of poor air quality which are predominantly located along the roads surrounding the OA.

Figure 2.17: Flood Risk Zones in and around the OA
Building Heights

2.41 There are three significant tall buildings within the OA; the 31 storey Empress State Building; Earl’s Court 1 which is a maximum height of 63m AOD; and Earl’s Court 2. These are located on the eastern side of the OA. Buildings of these heights are atypical in the immediate surroundings.

2.42 Other buildings with significant height in the OA are dispersed more widely. Ashfield House to the north and the four council blocks on the west rise to between 9 and 11 storeys. The heights across the rest of the site are between 2 and 6 storeys and are more closely related to those prevailing in the surrounding area (figure 2.18).

2.43 In the surrounding area, building heights are related to building typology. The important residential typologies found around the OA include town houses, terraced town houses, mansion blocks, mews houses and infill blocks.
Open Space

2.44 There is an identifiable pattern of open space in the OA’s surroundings. This consists of:

- formal garden squares, which are usually lined on one or two sides by buildings and are predominantly ‘semi private’ (accessible only to those who contribute to their upkeep). However, they do provide important public visual amenity;
- communal gardens which are usually located between two terraces and shared by the residents of the terraces that define them. As either end of the communal gardens are left open to the street, they also provide public visual amenity; and
- private rear gardens relating to specific dwellings and accessible only to their inhabitants.

2.45 These contribute to the urban structure of the area, creating a rich rhythm of terraced buildings and open spaces.

2.46 Of further note is the Counter’s Creek, one of London’s ‘lost rivers’. This former natural stream was first artificially channelled in 1827, when it started to become an integral part of London’s sewerage infrastructure, and is now fully culverted.

Figure 2.19: Open spaces in and around the OA
Open Space

2.47 Within the OA there is one identified area of biodiversity importance; a semi-natural green corridor running alongside the West London Line (more or less on the boundary between LBHF and RBKC). It has been classified as a Site of Nature Conservation Importance (Grade 1) in LBHF, although some of the corridor straddles the boundary into RBKC.

2.48 Figure 2.20 shows the sites of nature conservation importance in the vicinity of the OA.

2.49 Figure 2.21 illustrates that there is significant deficiency of publicly accessible open space within the OA itself.
In terms of existing public provision, Normand Park, which is located to the south west of the OA, provides two hectares of public open space. To the south east of the OA is Brompton Cemetery. Whilst this is publicly accessible, it cannot be regarded as recreational open space in the usual sense and is therefore not considered to contribute to combating open space deficiency. Within the OA itself are several small pockets of publicly accessible open space, which are used for leisure and some children’s play. These spaces are small, fragmented and are of a poor quality as they are incidental space left over following the design of the estates in the 1970s. The Core Strategies for both local authorities identify much of the OA as deficient in publicly accessible open space, as shown in Figure 2.21. This deficiency reflects the lack of a large publicly accessible local park in this area.

Existing play provision is limited to the western extremities of the OA. Facilities for under 5s in the area are generally poor, consisting primarily of provision on housing estates, with the exception of the playspace in Normand Park. Two of these play spaces are on the West Kensington and Gibbs Green estates, which would be lost if estate redevelopment were to occur. Play provision for 5-11s is generally good. Two of the play spaces are on the West Kensington and Gibbs Green estates, which would be lost if estate redevelopment were to occur. Of all the 8 play spaces in the vicinity of the OA only the play spaces at Normand Park and Alice Gilliat can be considered genuinely public, with the other six contained within housing estates.

<table>
<thead>
<tr>
<th>Map Ref.</th>
<th>Facility</th>
<th>Age Group</th>
<th>Type</th>
<th>Distance from OA</th>
<th>Area</th>
<th>Condition / comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Ivatt Place Playground</td>
<td>Under 5s, 5-11s</td>
<td>Equipped playground</td>
<td>Within the OA</td>
<td>1100sqm</td>
<td>Estate playground takes up a lot of land, but just 6 apparatus.</td>
</tr>
<tr>
<td>2</td>
<td>Gibbs Green Playground</td>
<td>Under 5s, 5-11s</td>
<td>Equipped playground</td>
<td>Within the OA</td>
<td>580sqm</td>
<td>Estate playground but with LEAP status</td>
</tr>
<tr>
<td>3</td>
<td>Basketball Court</td>
<td>12s+</td>
<td>Ball court</td>
<td>Within OA</td>
<td>570sqm</td>
<td>Ball court with tarmac surface</td>
</tr>
<tr>
<td>4</td>
<td>Basketball Court 2</td>
<td>12s+</td>
<td>Ball court</td>
<td>Within OA</td>
<td>280sqm</td>
<td>Ball court with tarmac surface</td>
</tr>
<tr>
<td>5</td>
<td>Alice Gilliat Playground</td>
<td>Under 5s, 5-11s</td>
<td>Equipped playground</td>
<td>150 metres</td>
<td>380sqm</td>
<td>Public playground but adjacent to a housing estate</td>
</tr>
<tr>
<td>6</td>
<td>Shuters Square Playground</td>
<td>Under 5s</td>
<td>Equipped playground</td>
<td>200 metres</td>
<td>90sqm</td>
<td>Very small and few apparatus</td>
</tr>
<tr>
<td>7</td>
<td>Vine Square</td>
<td>Under 5s, 5-11s</td>
<td>Equipped playground</td>
<td>100 metres</td>
<td>350sqm</td>
<td>Estate playground. Would meet former LEAP status</td>
</tr>
<tr>
<td>8</td>
<td>Normand Park Playground</td>
<td>All</td>
<td>Equipped playground</td>
<td>500 metres</td>
<td>2,000sqm</td>
<td>Public playground in local park</td>
</tr>
</tbody>
</table>

Table 2.1: The play spaces that serve and are accessible to the OA
2.52 Figure 2.22 shows the current ground floor land uses in and around the OA.

2.53 The 31 storey Empress State Building is situated immediately to the west of Earl’s Court 2 and is the tallest building within the OA and indeed in much of West London. The building is currently occupied by the Metropolitan Police. To the north of Earl’s Court Exhibition Centre 2, the TfL Lillie Bridge Depot covers a substantial area of 7.3ha comprising marshalling yards, engineering workshops and Ashfield House, a 9 storey training facility that dominates the northern boundary of the OA.

2.54 The West Kensington and Gibbs Green housing estates lie to the west of the Earl’s Court Exhibition Centres and the TfL Lillie Bridge Depot. The larger West Kensington estate, containing 604 properties, was built between 1972 and 1974 and includes several slab blocks of 9, 10 and 11 storeys along with low rise flats, maisonettes and terraced houses. The smaller Gibbs Green estate features 98 properties built in 1961 comprising 7 medium-rise blocks. The estates have poorly arranged internal roads and irregular placement of buildings surrounded by poorly utilised open space, particularly on the West Kensington estate. On-street and forecourt parking spaces dominate the streetscape of the estates. The overall proportion of social rented housing on the estates is 78 percent.

2.55 To the south of the OA is the Seagrave Road car park, which is a parcel of land situated adjacent to the West London Line. It covers an area of 2.9ha featuring a small number of temporary and semi-permanent utility structures.

2.56 There are a number of other smaller and/or ancillary land uses within the OA, namely:
- Gibbs Green school, which was previously a primary school but is currently being used to temporarily house Queensmill Special School;
- private residential houses, flats and maisonettes on Empress Place, Lillie Road and Seagrave Road;
- Registered Provider properties located around the West Kensington and Gibbs Green estates;
- a range of A1–A5 uses along Lillie Road, North End Road, Old Brompton Road and Seagrave Road, some with converted residential flats on the upper floors;
- a hotel, community centre and telephone exchange north of Lillie Road;
- a small area of commercial and light industrial uses to the south of Lillie Road;
- a bus turning and waiting facility on Lillie Road immediately adjacent to Earl’s Court 2 and the Empress State Building; and
- the Clear Channel buildings and hoardings, plus laundry and mannequin-making facilities located south of West Cromwell Road.
Land Use

Figure 2.22: Ground floor land uses in the OA and its surroundings
Housing

2.57 The area surrounding the OA is typically characterised by Victorian terraced housing and Edwardian mansion blocks, which are generally owner occupied or privately rented. There are also some post-war housing estates located to the east and north of the OA and some modern, purpose built residential premises to the north.

2.58 Within the OA, existing housing is primarily located within the West Kensington and Gibbs Green estates. Some properties are now leasehold or freehold having been purchased under the ‘right to buy’ scheme. Some private residential accommodation is also located to the south of the OA, on Empress Place, Lillie Road and Seagrave Road.

2.59 The West Kensington Estate was built between 1972 and 1974 and contains 604 dwellings. This consists of 463 flats and 141 terraced houses. 476 of the dwellings are socially rented, 89 are leasehold and 39 are freehold. The majority of dwellings are a mix of 1 and 2 bedroom flats, along with some larger 3 and 4 bedroom maisonettes and houses.

2.60 The Gibbs Green Estate was built in 1961 and contains 98 flats and maisonettes. 42 of these dwellings are leasehold. The remaining 56 dwellings are socially rented. All of the dwellings are 2 and 3 bedroom units.

2.61 In addition to the estate properties, a number of Housing Associations own property within the OA. Family Mosaic owns 42 homes in Dieppe Close, Lerry Close and Thaxton Road; London and Quadrant own 9 properties in Aisgill Avenue and Marchbank Road; and Shepherds Bush Housing Association own 7 properties in Garsdale Terrace. All of the Housing Association properties in the Opportunity Area are social rented.

2.62 Altogether, social rented housing comprises 78% of the total number of properties on the estates and Housing Association land. The rest of the properties (22%) have been bought by residents under the ‘right to buy’ scheme.

2.63 Table 2.2 shows the existing housing provision on the West Kensington and Gibbs Green Estates, along with other Housing Association provision in the area. Table 2.3 shows the tenure profile of the estates compared to other geographies.
### Housing

#### Table 2.2: Housing Size and Tenure within the existing estates and Registered Provider properties

<table>
<thead>
<tr>
<th>House Type</th>
<th>Gibbs Green</th>
<th>West Kensington</th>
<th>RSL</th>
<th>Totals</th>
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<tbody>
<tr>
<td></td>
<td>Social Rent</td>
<td>Social Rent</td>
<td>Lease-holders</td>
<td>Lease-holders</td>
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<tr>
<td>1 Bed Flat</td>
<td>0</td>
<td>163</td>
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<td>1 Bed House</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2 Bed Flat</td>
<td>32</td>
<td>180</td>
<td>56</td>
<td>0</td>
</tr>
<tr>
<td>2 Bed House</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>3 Bed Flat</td>
<td>24</td>
<td>22</td>
<td>11</td>
<td>0</td>
</tr>
<tr>
<td>3 Bed House</td>
<td>0</td>
<td>75</td>
<td>0</td>
<td>28</td>
</tr>
<tr>
<td>4 Bed Flat</td>
<td>0</td>
<td>8</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>4 Bed House</td>
<td>0</td>
<td>27</td>
<td>0</td>
<td>11</td>
</tr>
<tr>
<td>Totals</td>
<td>56</td>
<td>475</td>
<td>90</td>
<td>39</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Area</th>
<th>Owner-occupied</th>
<th>Council</th>
<th>RSL</th>
<th>Private Rented/other</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Kensington and Gibbs Green Estates</td>
<td>11.1%</td>
<td>70%</td>
<td>7.6%</td>
<td>7.2%</td>
</tr>
<tr>
<td>North End Ward</td>
<td>40.3%</td>
<td>20.7%</td>
<td>9.9%</td>
<td>29.1%</td>
</tr>
<tr>
<td>Hammersmith &amp; Fulham</td>
<td>43.9%</td>
<td>19.2%</td>
<td>13.5%</td>
<td>23.4%</td>
</tr>
<tr>
<td>London</td>
<td>56.5%</td>
<td>17.1%</td>
<td>9.1%</td>
<td>17.3%</td>
</tr>
</tbody>
</table>

Table 2.2: Housing Size and Tenure within the existing estates and Registered Provider properties

Source: West Kensington and Gibbs Green Estate Profile July 2010

Table 2.3: Comparison of tenure profile

Social and Community Facilities

Education

2.64 Figure 2.25 shows the locations of nursery, primary and secondary education provision within the vicinity of the OA. The former Gibbs Green primary school is located within the OA. This is currently being used as accommodation by a special school. There is an independent nursery to the south of the estates called the Kiddi Karu Nursery. LBHF’s Infrastructure Study 2010 shows that current primary and nursery school provision in the area is at capacity.

Health

2.65 Figure 2.26 shows the locations of hospitals, health centres and GP facilities within the vicinity of the OA. Within the OA itself there is a GP facility located at 82 Lillie Road which provides 10 consulting rooms. As part of NHS Hammersmith and Fulham’s Estate Strategy, a new Centre for Health has opened on North End Road opposite the OA. This facility provides 1,200sqm of health floorspace and 10 consulting rooms and has been provided in order to facilitate the relocation of other GP facilities in the borough rather than increasing healthcare capacity in order to meet the needs of any regeneration proposals in the area.
Retail

2.66 Figure 2.27 shows that there are four shopping areas within the vicinity of the OA. The largest of these is Fulham Town Centre, which is designated as a Major Town Centre in the London Plan (2011) and extends to within the OA boundary. To the east of the OA is Earl’s Court Road, designated in RBKC’s Core Strategy (2010) as a Neighbourhood Centre and in the London Plan (2011) as a District Centre. To the north-west of the OA is the North End Road (West Kensington) Key Local Shopping Centre and to the east of the OA is Old Brompton (West) Neighbourhood Centre.

2.67 Fulham Town Centre is situated at the southern end of North End Road and extends from Lillie Road to Fulham Broadway. Its main activity shopping (including the busy North End Road Market) and services for the local Fulham community. The centre has traffic congestion and car parking problems and has suffered from competition with surrounding centres (including Kingston High Street and Putney) and out of centre stores in Cromwell Road (Waitrose), Townmead Road (Sainsbury’s) and Warwick Road (Tescos). It has lost not only elements of its retail business, particularly at the northern end of the centre, but also recreation and entertainment uses. Despite this situation, the centre has managed to attract a number of new retailers, food and drink establishments and cinemas and continues to provide an important focus for many residents.

2.68 Earl’s Court Road is designated as a Neighbourhood Centre within RBKC’s adopted Core Strategy (2010); a designation which recognises its scale and its primary function of serving the day-to-day needs of local people and those visiting the Exhibition Centres. It remains a vibrant centre providing a diverse range of shops, restaurants, cafes and pubs. However, the centre has an 8.9% vacancy rate, which is higher than some other centres in the borough.

2.69 The North End Road (West Kensington) Key Local Shopping Centre also has a local function, providing a range of convenience shops and other services. In 2008, 54% of the uses within the centre fell within the A1 Use Class and there was a 12% vacancy rate. There is also some out of centre retail along the west side of North End Road, linking Fulham Town Centre with North End Road (West Kensington).

2.70 Old Brompton Road (West) is designated as a Neighbourhood Centre within RBKC’s Core Strategy (2010). This centre is predominantly linear, running along Old Brompton Road between the junctions of Warwick Road and Earl’s Court Road. The centre caters for local need, although it also provides a specialist comparison role in the form of DIY and interior design shops. The centre is generally attractive, with well kept shopfronts, wide pavements and limited street clutter. However, there is currently a 10% vacancy rate.

2.71 Further away from the OA there are several very important and successful higher order centres, such as Shepherd’s Bush (including Westfield), Hammersmith, Kensington High Street, Notting Hill and King’s Road. In addition to the local convenience function, these centres are also important comparison shopping destinations with a catchment that includes the OA.
Socio-Economic Conditions

2.72 In 2007 most of the OA fell within the 30 percent most deprived areas in England as indicated by the Index of Multiple Deprivation (figure 2.28). The North End and Fulham Broadway wards are both ranked within the 10 percent most deprived wards in England with respect to income levels and barriers to housing and services. In particular, the Gibbs Green and West Kensington estates are both in the 10 percent most deprived neighbourhoods in LBHF, experiencing the highest levels of income and employment deprivation and very significant housing and services deprivation.

2.73 Neighbourhoods within the Earl’s Court Ward by comparison are significantly less deprived on average, although this represents one of the lower income wards in RBKC outside of North Kensington.

2.74 The OA also suffers from higher unemployment than surrounding areas, with 22 percent of residents on the Gibbs Green Estate and 28 percent of residents on the West Kensington Estate claiming welfare benefits, compared to a LBHF average of 14 percent. There are also more long-term unemployed residents, with approximately 40 percent of unemployed residents claiming benefits for a period longer than 6 months compared to the LBHF average of 30 percent.

2.75 With regard to health, the residents of the Gibbs Green and West Kensington estates suffer from below average health outcomes and the area generally suffers from health deprivation.

2.76 Educational attainment on the West Kensington and Gibbs Green estates is significantly lower than the ward averages, with almost one third of adult residents having no qualification at all. LBHF audits of the Gibbs Green and West Kensington estates show that in 2008, 30 percent of the working age population had no educational qualifications and only 31 percent in the Gibbs Green Estate and 20 percent in the West Kensington Estate had university level qualifications (level 4 and 5 qualifications).

Figure 2.28: Index of Multiple Deprivation ranking in and around the OA
Culture

2.77 The culture, leisure and entertainment value of the OA is provided within the Earl’s Court Exhibition Centres One and Two. Over the years the Exhibition Centres have hosted numerous nationally and internationally renowned events / shows (such as the Motor Show, London Boat Show, Royal Agricultural Show, ‘Crufts’, the Royal Tournament, Ideal Home Show, BRIT Awards), musicians / bands (such as Take That, Pink Floyd, The Rolling Stones, Madonna, Queen, David Bowie, Kylie Minogue, and many more) and opera (such as Carmen and Aida). The Exhibition Centres will host the indoor volleyball during the 2012 Olympic Games.

2.78 Earl’s Court Exhibition Centre 1 has an exhibition area of approximately 40,000m², with a maximum capacity of 30,000 people. Earl’s Court Exhibition Centre 2 has an exhibition area of approximately 17,000m², with a maximum capacity of 12,000 people. The two centres also provide additional smaller exhibition, meeting and conference space in separate accommodation within the buildings.

2.79 The Exhibition Centres attract approximately 3 million visitors and 30,000 exhibitors each year. This major attraction makes a significant contribution to the local community, benefiting local hotels, restaurants, bars, taxi firms and local business who have adapted to cater for the needs of the exhibition centres.

2.80 Figure 2.29 shows the location of hotels in and around the OA. There is a high concentration of hotels within the vicinity of the OA and one hotel located within the OA itself at 295 North End Road.

Figure 2.29: Existing hotel provision in and around the OA
03 VISION AND OBJECTIVES
Vision

3•1 This vision reflects and is based on the aspirations for the OA of LBHF, RBKC and the Mayor of London, as established by both boroughs' Core Strategies and the Mayor’s London Plan. It is not intended to exclude any acceptable development options which would accord with the London Plan and the Core Strategies. The vision has been drafted with this in mind and would apply to any application coming forward in the OA.

“West London’s New Urban Quarter”

3•2 “Residential led regeneration of the OA will result in a world class, environmentally sustainable new urban quarter that people will want to live in, work in and visit. The new community will be mixed and diverse, with quality housing provided to meet a range of incomes and contribute to the Capital’s needs and potential for growth.

3•3 The new urban quarter will capture the spirit of this part of London by continuing the legacy of the Earl’s Court ‘brand’ with a new cultural destination that will continue to draw visitors from across the Capital.

3•4 It will be integrated into the existing urban fabric and character of the surrounding area, respecting the heritage assets and the pattern of streets, buildings and open spaces. The environment created will be of high quality throughout, adopting the best of typical West London character and complementing it with the best of contemporary design. It will provide safe, stimulating, well managed neighbourhoods that are attractive, exciting and served by a first class, well connected network of streets and open spaces that encourage walking and cycling. For the first time in the OA, the two neighbouring boroughs will be connected through improved east-west connections.

3•5 The redevelopment of the area will incorporate sensitively designed, publicly accessible, green, open spaces, including a number of garden squares. They will offer a range of opportunities for both formal and informal play and recreation as well as enhancing the ecological value of the area. All public open spaces, play spaces, streets and buildings will be inclusive and accessible.

3•6 There will be a substantial increase in the number of homes in the area, with new housing for sale and rent at a range of prices and affordability. The Gibbs Green and West Kensington estates will be regenerated, with existing residents benefiting from greater housing choice, and higher quality, more suitable homes, designed with their needs in mind. All existing residents will be able to continue living in the area if they choose to do so, and the existing community will be enriched with a more varied, balanced and sustainable socio-economic mix.

3•7 Many people will choose to both live and work in the area, reducing the need for commuting and the subsequent demand on the public transport and road networks. Improvements to the road and public transport networks will be made to ensure that the impacts of development are minimised.
Vision

3.8 The new urban quarter will make the most of its enviable location on the A4, equidistant between London’s largest international airport at Heathrow, and London’s economic heart in the West End and the City. As a result it will become an attractive and high profile location for both large and small businesses, from start-ups to established institutions.

3.9 Regeneration will have overwhelmingly positive effects in the surrounding area, increasing the economic health of local businesses, town and local centres and contributing to local employment and community needs, with a high proportion of the new jobs created being filled by local people.

3.10 The economic health of this part of North End Road will be revived with new shops, restaurants and services opening on its eastern side to create a two sided shopping street. Other retail and services to meet the day to day needs of new residents and workers will cluster around the existing tube stations on the edges of the OA and in a new centre within it. This new retail will complement rather than compete with existing retail centres, through careful management.

3.11 The new urban quarter will provide a number of community facilities to support the new living and working populations. This will include a new community hub with space to accommodate a range of multi functional community uses. The new quarter will also be supported by a new primary and secondary school, a health centre, affordable sports and leisure facilities and police infrastructure.

3.12 Outstanding environmental performance will be achieved by the use of low and zero carbon technologies, including renewable energy sources, a district heat network and combined heat and power. Sustainable approaches to mitigating waste, water management and controlling noise and air quality will also be introduced."
Key Objectives

3.13 Urban Form

- Maximise connectivity;
- Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces;
- Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;
- Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context;
- Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape; and
- Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

3.14 Housing

- Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

3.15 Employment

- Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

3.16 Retail

- New ‘comparison’ retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd’s Bush, Kensington High Street and King’s Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and
- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

3.17 Culture

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor’s London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl’s Court ‘brand’.

3.18 Social and Community facilities

- Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

3.19 Transport

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.
Key Objectives

3.20 Energy

- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

3.21 Environment

- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

3.22 Section 106 and Phasing Strategy

- Ensure a comprehensive approach to redevelopment of the OA; and
- Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.
Urban Form

Figure 3.1: Illustrative diagram showing the main urban form aspirations that could be delivered as part of comprehensive regeneration of the OA. For illustrative purposes only.
Land Use

**The OA**

**Underground Stations**

**Overground Stations**

**Predominantly residential**: All floors residential, but with scope for occasional convenience retail or social and community uses on lower floors.

**Mixed use retail hubs**: Retail led mixed use clusters with some scope for small offices and social/community facilities. Upper floors predominantly residential.

**Mixed use commercial**: All floors could be commercial, predominantly large, discrete offices. Although there is also scope for hotels and some retail and residential uses.

**A new centre**: Zone in which main cultural destination will be found with some retail, social/community facilities and small to mid sized offices. Upper floors to be predominantly residential.

**Existing mixed use centres**

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Figure 3.2: Illustrative diagram showing different land uses that could be delivered as part of comprehensive regeneration of the OA. For illustrative purposes only.
Illustrative Masterplan

Figure 3.3: Illustrative masterplan showing one possible way in which the Vision and Key Objectives could be achieved in the OA. More explanation of this illustrative masterplan can be found in the Development Capacity Scenarios SPD Supporting Document. For illustrative purposes only.
Illustrative Land Use

Figure 3.4: Illustrative masterplan showing one possible arrangement of ground floor land uses
For illustrative purposes only.

Figure 3.5: Illustrative masterplan showing one possible arrangement of upper floor land uses
For illustrative purposes only.
Figure 3.6: The view towards the OA from Archel Road
04 URBAN FORM STRATEGY
Overview

Key Objectives

- Maximise connectivity;
- Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces;
- Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;
- Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context;
- Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape; and
- Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

4.0 This Urban Form Strategy establishes a spatial framework, based on six Key Objectives (left) to deliver a quality new urban quarter.

4.1 The Key Principles are set out under each Key Objective and are followed by diagrams and photographs to suggest how they could be achieved. At the end of this chapter there is also guidance on how the OA could be divided into a number of different illustrative development parcels, each delivering the appropriate Key Objectives.

4.2 This Urban Form Strategy is supported by the following SPD Supporting Evidence Documents:
- Character Area Analysis;
- Townscape and Visual Analysis;
- Edges Study; and
- Development Capacity Scenarios.

Context

4.3 The OA itself is dominated by the Empress State Building, the Earl’s Court Exhibition Centres and railway infrastructure. The surrounding area consists of a much more finely grained urban structure with a number of formal garden squares, communal gardens and private rear gardens. The predominant residential building typologies around the OA include town houses, terraced town houses, mansion blocks, mews houses and infill blocks.

4.4 Within the OA there are a number of significant barriers to movement, particularly the West London Line which runs along the boundary between LBHF and RBKC and prevents east-west connectivity between the boroughs. The OA also features some very distinctive topographical conditions formed by the railway infrastructure.

4.5 In and around the OA a significant deficiency of publicly accessible open space has been identified.

4.6 There are 19 conservation areas in and around the OA, including Brompton Cemetery. There are also a number of sensitive long distance views, particularly those identified in the RBKC Building Heights SPD, which may be effected by development in the OA. Any development will be required to respect the character and appearance of its surroundings and all heritage assets.
Policy Context

4.7 The Mayor’s London Plan (2011):
• ‘Quality and design of housing developments’ (Policy 3.5);
• ‘Children and Young People’s Play and Informal Recreation Facilities’ (Policy 3.6);
• ‘Large residential developments’ (Policy 3.7);
• ‘Building London’s neighbourhoods and communities’ (Policy 7.1);
• ‘An Inclusive Environment’ (Policy 7.2);
• ‘Designing Out Crime’ (Policy 7.3);
• ‘Local Character’ (Policy 7.4);
• ‘Public Realm’ (Policy 7.5);
• Location and design of tall and large buildings’ (Policy 7.7);
• ‘Heritage assets and archaeology’ (Policy 7.8);
• ‘Heritage-led regeneration’ (Policy 7.9);
• ‘Implementing the London View Management Framework’ (Policy 7.12); and
• ‘Protecting Local Open Space and Addressing Local Deficiency’ (Policy 7.18).

4.8 LBHF’s Core Strategy (2011):
• ‘Built Environment’ (Policy BE1);
• ‘Strategic Site and Housing Estate Regeneration Area - FRA 1’; and
• ‘Improving and Protecting Parks and Open Spaces’ (Policy OS1).

4.9 RBKC’s Core Strategy (2010):
• ‘Earl’s Court’ (Policy CP10 and associated Vision);
• ‘Earl’s Court Exhibition Centre’ (Policy CA7);
• ‘Biodiversity’ (Policy CE4);
• ‘Context and Character’ (Policy CL1);
• ‘New Buildings, Extensions and Modifications to Existing Buildings’ (Policy CL2);
• ‘Heritage Assets - Conservation Areas and Historic Spaces’ (Policy CL3);
• ‘Heritage assets – Listed Buildings, Scheduled Ancient Monuments and Archaeology’ (Policy CL4);
• ‘Amenity’ (Policy CL5);
• ‘Street Network’ (Policy CR1);
• ‘Three-dimensional Street Form’ (Policy CR2);
• ‘Street and Outdoor Life’ (Policy CR3);

4.10 RBKC’s ‘Building Height in the Royal Borough’ SPD.


Connectivity and Urban Grain

- The OA
- Underground Stations
- Overground Station
- Streets within surrounding area that could be extended
- Potential east-west routes across the OA
- Important connection between Star Road and the OA
- Potential north-south routes across the OA
- Potential north-south pedestrian and cyclist connection(s) that could be created by decking over the railway lines
- Potential crescents replicating existing street pattern
- Existing pattern of garden squares
- Special landmarks in the existing context, views of which should be retained
- Area in which a connection to A4 could be made
- Potential pedestrian/cyclist only connections from A4 into the OA
- Potential to explore the use of the link under A4 by pedestrians and cyclists and/or as a temporary construction traffic route

Figure 4.1: Illustrative diagram showing the potential to establish maximum connectivity and a suitable urban grain within the OA
Connectivity and Urban Grain

**Key Objective**
Maximise connectivity.

**Key Objective**
Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces.

4.13 At present, the OA can be thought of as an ‘island’ in the urban fabric. It is so disconnected that there is no way for people to move across it directly between the two boroughs. Severance is caused by the railway lines, the Exhibition Centres and the changes in ground level that currently exist across the OA.

4.14 It is easier for people to find their way around an area when the design of streets responds directly to their role in a well defined street hierarchy. There is already a well defined street hierarchy surrounding the OA (see Figure 4.2) into which the new streets will be expected to integrate.

**Key Principle UF1:**
Introduce a number of new east-west and north-south connections across the OA that overcome the existing severance.

**Key Principle UF2:**
Create east-west connectivity between Warwick Road and North End Road at an early phase of development.

4.15 Overcoming the existing severance is one of the fundamental aims of regeneration in the OA. Figures 4.36 to 4.39 suggest an approach to parcelling up the development in a manner that could achieve east-west connectivity in an early phase.

4.16 Even if comprehensive regeneration of the entire OA never happens, the authorities will expect east-west connectivity to be delivered. Therefore, any application for development within the OA will be expected to contain contingency plans that demonstrate how this can be achieved if later phases are not progressed.

**Key Principle UF3:**
Establish a clear and well defined network of streets providing a variety of environments and a choice of routes. The urban grain of new streets proposed for the OA should be inspired by the street types and patterns identified in the best of the surrounding context.

4.17 Proposals that replicate the distinctive street alignments found in the OA’s surroundings are encouraged.

4.18 The existing street hierarchy can be categorised into Primary, Secondary and Tertiary Streets. Primary Streets define neighbourhoods and connect them with the wider city. Secondary Streets form the majority of the urban grain and subdivide the neighbourhoods into urban blocks. Tertiary Streets create extra local connections.

4.19 The Primary Streets that currently surround the OA should be sufficient to define the new neighbourhood and connect it with the wider city. Therefore, in order to establish a suitable urban grain in the OA, no new Primary Streets will be expected. However, in traffic capacity terms some streets may become more dominant than others and should be designed accordingly, with due care being taken to avoid the creation of new vehicular ‘rat runs’. A number of new Secondary and Tertiary Streets should be provided.
Connectivity and Urban Grain

4.20 New Secondary Streets should form a permeable, generally orthogonal grid (i.e. a grid that is based on right angles and perpendicular streets). The existing street patterns in the surrounding area tend to have a number of strong, orthogonal east-west connections and fewer, often more broken up, north-south connections.

4.21 New Tertiary Streets should ensure that the urban grain is fine. They should prioritise very local movement, particularly by pedestrians and cyclists and should contribute to informal play provision.

Key Principle UF4: Extend existing streets into and through the OA.

4.22 There are a number of existing streets that could be extended into and through the OA as part of comprehensive regeneration including:
- Archel Road;
- Chesson Road;
- Baron’s Court Road;
- Merrington Road;
- Halford Road;
- Hildyard Road;
- Beaumont Crescent;
- Beaumont Avenue; and
- Star Road.

4.23 If these existing streets are extended, care should be taken to respect existing dimensions, building heights and enclosure ratios.

4.24 The direct extension of Star Road into the OA is considered particularly important as it has the greatest potential to connect the new neighbourhood to the wider context in the west. This connection must therefore be delivered and it must be delivered in the earliest phase possible.

4.25 Extending the urban grain should exploit all opportunities to strengthen connections between the OA and Fulham Town Centre, ensuring that activity levels are focused on North End Road and do not take footfall away from existing shops and businesses.
Connectivity and Urban Grain

Key Principle UF5:
Extend the existing pattern of garden squares found around the OA into the new neighbourhood and use their most successful features as design precedent for new publicly accessible green open spaces.

4.26 New gardens squares in the OA should take the existing squares in the surrounding area as their design precedents. Design features may therefore include:
• active streets (accommodating vehicles, pedestrians and cyclists) defining all four edges of the garden squares;
• garden squares framed by predominantly residential buildings;
• visually permeable boundary treatments (such as hedges or railings) used to ensure garden squares offer visual amenity to the surrounding streets;
• a grand sense of scale created by substantial mature trees; and
• the inclusion of games courts, like the tennis courts at Queens Club Gardens.

4.27 Contemporary garden squares that adopt the most positive characteristics of the traditional garden squares, but also meet 21st Century demands are encouraged. In order to meet contemporary demands, new publicly accessible green open spaces should differ from existing garden squares in the following ways:
• they should be publicly accessible to everyone;
• there should be no private rear gardens backing onto publicly accessible spaces;
• they may spill out into shared surface streets around their edges in order to become a more active part of the public realm; and
• mature trees are encouraged, and could be used to create shade, but they should not leave open spaces dark and/or overshadowed.

Key Principle UF6:
Retain and/or improve views of special existing local landmarks.

4.28 There are three views of special local landmarks (St. Andrew’s Church, St. Cuthbert’s Church and St. Luke’s Church) that the authorities are keen to retain and improve (see Figure 4.4). This will both aid legibility and knit the new development into its existing context. The heights of the buildings that frame the views of these landmarks should not undermine their status as wayfinding markers.

Figure 4.3: Aerial photograph highlighting existing garden squares in the OA’s immediate surroundings

Figure 4.4: Illustrative diagram showing views of the special existing landmarks that the authorities have identified
### Key Principle UF7:
Create new view compositions in the OA that complement those identified in the surrounding area and aid navigation and wayfinding.

4•29 The Character Area Analysis SPD Supporting Evidence document identifies a number of successful view compositions and landmark buildings that create distinct places and assist with wayfinding. This includes a number of well enclosed long views (see Figure 4.5) and a number of views deflected off corner buildings (see Figure 4.6). Creating new view compositions like these within the OA will not only help to integrate the new development into its surroundings, it will also help people to find their way around, as well as adding to the visual interest.

#### Figure 4.5: An example of a well enclosed long view, looking down Redcliffe Gardens to a 'view terminating' building

#### Figure 4.6: An example of a deflected view, looking down the gently curving Hogarth Road to the corner building on Knaresborough Place

### Key Principle UF8:
Introduce a deck structure over the railway lines in order to enable an acceptable number of east-west connections to be made. If this proves not to be viable, a series of bridges over the railway lines could be acceptable.

4•30 Achieving the authorities’ connectivity aspirations will require either decking or bridging over the West London Line and the District Line of the London Underground.

4•31 Bridging over the railway lines in a number of discrete locations would result in the majority of the railway lines remaining exposed. This could result in intrusive noise levels in the new development.

4•32 Alternatively, east-west connectivity could be achieved by introducing more extensive decking over the entire railway. The deck could be used for either buildings or for the creation of open space. Either way, its long term structural integrity must be guaranteed. Any open space created on top of the deck must exploit the opportunity to create new, direct north-south connections.

4•33 Whether the top of a deck is used for open space or buildings, it must not compromise connectivity. Any open space should be permeable, and there should be new routes created around and across it that are accessible for all road users. The creation...
Connectivity and Urban Grain

4.34 At present, the A4 has a very hostile pedestrian environment. As part of comprehensive regeneration, this should be improved with high quality planting and landscaping and other streetscape improvements. The new buildings that front onto the A4 should not create an oppressive ‘mono-elevation’.

4.35 Whether the railway line is decked over or bridged over, tangible links with the past could be created by tracing its alignment (which is also the alignment of the now culverted Counters Creek) and leaving parts of the railway line exposed.

4.37 Only one vehicular connection from the OA to the A4 is expected. However, this should be complemented by additional pedestrian routes from the footway along the southern edge of the A4 into the OA in order to increase visual as well as physical permeability. Such routes must be well overlooked and should include entrances to buildings.

Key Principle UF9:
Increase pedestrian connectivity from the A4 into the OA.

4.36 At present, the land adjacent to the railway line carries significant biodiversity value. If it is decked over, this must be replaced and enhanced through an open space strategy. Please refer to the Environmental Strategy (Chapter 12) for further detail.

4.38 ‘Dead ends’ should be avoided.
Public Open Space

Figure 4.10: Illustrative diagram showing the potential distribution of open space throughout the OA.
Public Open Space

Key Objective
Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities.

4.38 As set out in the Site Context Chapter, much of the OA and its surroundings are deficient in publicly accessible open space. There is also limited access to play facilities. Although Brompton Cemetery is large, it does not contribute sufficiently to formal recreation provision to combat the open space deficiency. Of all the surrounding garden squares, only Redcliffe Square is publicly accessible.

4.39 There are a number of Sites of Nature Conservation Importance (SNCI) in the OA. Please see Figure 4.11.

Key Principle UF10:
High quality civic spaces should be well integrated into the proposed urban grain, especially in those locations that are expected to have high levels of movement and activity and where appropriate ground floor land uses are proposed.

4.40 The opportunity to improve the public realm outside each of the existing underground stations and to provide welcoming civic spaces at the 'gateways' into the OA should be explored. The Culture Strategy (Chapter 8) also requires civic spaces to be provided in relation to the new cultural destination.

4.41 Retail, cafe, culture and community uses should be located on the ground floor around civic spaces to provide them with life and activity.

4.42 As set out in the transport chapter, civic spaces outside underground stations will be expected to enhance the potential for transport interchange.

4.43 Of particular significance is the potential for a new pedestrian focused civic space outside Earl’s Court Station, as established in RBKC’s core strategy. This “open urban square” will need to accommodate the significant changes in level that occur in this location whilst maintaining a comfortable gradient for pedestrians. Introducing a welcoming sense of arrival and vibrant, lively public functions in this location could contribute to the continuation of the ‘Earl’s Court Brand’.

Key Principle UF11:
New public open spaces within the OA will be expected to provide for a mix of different leisure pursuits including sports pitches, children’s play, court games, passive recreation, community gardening and nature conservation.

4.44 Open space is an important community resource, which creates opportunities for leisure, recreation, play, ecology, natural drainage and improves visual aesthetics. It is key to many issues such as health and biodiversity. The provision of playing pitches, courts and play spaces will help to combat obesity, particularly in children. Some of the open space should also consist of space for community gardening in line with Policy 7.22 of the Mayor’s London Plan (2011).

4.45 Management arrangements will be secured to enable public open spaces to be used at all reasonable times by all members of the public.

4.46 The open spaces within the OA will also be expected to meet the requirements established in the Environment Strategy in relation to nature conservation, biodiversity, and Sustainable Urban Drainage Systems (SUDS). Ecological spaces should be provided in addition to the publicly accessible green open space and recreation quotas set out in this SPD.
Public Open Space

**Key Principle UF12:** Any proposal for comprehensive regeneration will be expected to include a publicly accessible local park of at least 2 hectares, either as one discrete park or as a series of contiguous smaller spaces that meet the criteria set out in Table 7.2 of the Mayor’s London Plan (2011).

4.47 Existing green spaces surrounding the OA tend to be small and well integrated into the very permeable urban grain. A wholly contained and undissected two hectare open space would not necessarily complement this. Therefore, proposals for a series of contiguous publicly accessible green open spaces that combine to make the offer of linear 2ha local park are encouraged. There are many advantages to this ‘linear park’ approach including the potential to:
- improve north-south connectivity for pedestrians and cyclists;
- maximise doorstep access to open space and the aesthetic benefits that parks afford;
- accommodate a diverse range of recreational activities;
- ensure that permeability is not compromised, even if the open spaces are locked at night;
- communicate the historical legacy of the OA by tracing the course of the culverted Counters Creek; and
- ensure that development provides diverse publicly accessible, green, open space in every phase.

4.48 Furthermore, a linear park approach has considerable potential ecological benefits. Although decking over the railway line may involve the loss of a SNCI, this loss can be mitigated if that deck is used to create a continuous biodiversity habitat. As such, a linear park on the deck over the railway would address Policy CE4 of RBKC’s Core Strategy (2010) which states that the council will “require that development proposals create opportunities to extend or link Green Corridors”.

4.49 The land area of SNCI lost by any decking should be reprovided in addition to the 2ha recreational open space.

4.50 Any proposal for a ‘linear park’ must include publicly accessible, green, open spaces that are wide enough to accommodate a range of functions, including full size games courts and sports pitches. It is therefore possible that if a proposal comes forward including a linear park, land take greater than 2ha will be required in order to ensure the park is fully functional.

4.51 Locating publicly accessible open spaces next to uncovered railway lines may result in unacceptable noise levels and risks to personal safety and should therefore be avoided.

**Key Principle UF13:** As far as possible, all residential properties should be within 100m walking distance of a publicly accessible green open space.

**Key Principle UF14:** Any regeneration proposal should provide a minimum of 10m² of publicly accessible green open space per child.

**Key Principle UF15:** Any regeneration proposal should provide a minimum of 10m² of dedicated play space per child.

4.52 There is no guidance at either regional or local level that sets out what overall quantity of public open space should be provided by a development of this size. The Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008) sets out standards for access to play. Standard B.2 within this SPG states that “a minimum of 10sqm of dedicated playspace per child (existing and new provision) is recommended as a basis for assessing existing and future provision”. It is considered that this provides a useful aggregation for the calculation of the overall quantity of public open space provision. Children under the age of five from houses with private gardens must not be discounted when assessing the publicly accessible green open space required by...
Public Open Space

Key Principle UF14.

4.53 Any quantum of publicly accessible green open space that is required over and above the 2ha local park should be provided in the form of garden squares that observe the design criteria set out under Key Principle UF5.

4.54 Key Principle UF15 is also based on the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008). Children under the age of five from houses with private gardens may be discounted when assessing dedicated play space requirements.

4.55 LBHF and RBKC are both densely developed and highly urbanised. In areas such as this, it is essential that redevelopment opportunities incorporate the provision of safe, stimulating play facilities.

Key Principle UF16:

Development in the OA will be expected to provide play facilities for all ages to address the local deficiency. Both naturalistic and equipped play will be expected, and provision for differing age groups should be co-located where appropriate in order to make supervision more practical for families. The authorities will secure the provision of equipped play that meets the location standards set out in Table 4.1 and that is of a size that adequately caters for children within its catchment.

Table 4.1: The standards for play set out in The Mayor of London’s SPG on Providing for Children and Young People’s Play and Informal Recreation (2008)

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Maximum walking distance from residential unit (taking into account barriers)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 5s</td>
<td>100m</td>
</tr>
<tr>
<td>5 – 11 year olds</td>
<td>400m</td>
</tr>
<tr>
<td>12+</td>
<td>800m</td>
</tr>
</tbody>
</table>

Key Principle UF17:

A phasing strategy that demonstrates how all of the publicly accessible green open space requirements will be met must be submitted with any application. It is expected that it will be delivered incrementally so that each phase has proportionate publicly accessible green open space to accommodate the increasing living and working populations.

Key Principle UF18:

All open spaces should be built and managed to Green Flag Award standards.

4.56 Given the current deficiency in play provision, the scale of development proposed in the OA and the likely uplift in numbers of young people, play space must be provided on-site to meet the needs of all ages. Therefore, a Play Strategy must be submitted with any application for the OA and any subsequent detailed applications must show the location of play areas and how these address the deficiency. Any proposals for open space and/or play space must consider the needs of disabled children and children with other special needs.

4.57 All ‘pocket parks’ (small areas of open space distributed throughout the public realm) should provide play space for under 5s. Some of the larger open spaces should provide play spaces for 5-11s and the 2ha local park should provide play facilities for all ages including 12+. The maximum distance that each of these age groups should be expected to walk to access a play space are set out in Table 4.1.

4.58 The Green Flag Award scheme provides benchmark national standard for parks and green spaces in the UK.

Figure 4.12: Community gardening at Normand Park
**Key Objective**
Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape.

4.13 For example, the exhibition centres are large footprint, large span buildings with dominant rooftops rising to a considerable height when compared with the surrounding context. However, as redevelopment will be residential led, it will introduce very different building typologies. Therefore, the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals. The location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape.

**Key Principle UF19:**
Preserve or enhance the character, appearance and setting of surrounding conservation areas and listed buildings.

4.59 Development within the OA will create a new skyline that should enhance the existing context.

4.60 At present, there are several buildings in the OA which are significantly taller than those in the surrounding area and therefore have an impact on the skyline (see Figure 4.13). For example, the exhibition centres are large footprint, large span buildings with dominant rooftops rising to a considerable height when compared with the surrounding context. However, as redevelopment will be residential led, it will introduce very different building typologies. Therefore, the heights of the existing exhibition centres should not be seen as precedent for redevelopment proposals. The location and height of new buildings should not be based on the location and height of existing buildings on the site, but rather on their impact on the quality and character of the surrounding townscape.

**Key Principle UF20:**
Preserve or enhance the character, appearance and setting of Brompton Cemetery and its listed buildings.

4.61 Buildings that are visible on the skyline can be harmful for listed buildings and their settings, conservation areas, historic parks and significant views. Development proposals, including those containing tall buildings, must respect the character and appearance of their surroundings.

4.62 Brompton Cemetery is a conservation area, the setting of listed buildings and monuments (which are listed in English Heritage’s List of Buildings of Special Architectural or Historic Interest), a registered ‘park and garden’ of special historic interest (Grade I listed) (as described in English Heritage’s Register of Parks and Gardens: Cemeteries) and Metropolitan Open Land. The views from Brompton Cemetery are panoramic and open and as a result, even new buildings of only moderate height may be visible. Therefore, any applications for redevelopment will be expected to preserve or enhance the inherent characteristics of...
Skyline

the cemetery setting whilst also improving the enclosure on the western boundary.

4.63 The opportunity to improve the enclosure of the cemetery is highlighted in RBKC’s Conservation Area Proposals Statement, which states that “Formal set- pieces such as the neat and open war graves section contrast with less well defined locations such as the flanked Chelsea Pensioners monument and with recent interments. These latter areas fail to provide sufficient enclosure where it is most needed on the western boundary”. Therefore, proposals on the eastern edge of the Seagrave Road site should introduce new buildings that enclose, but do not over dominate, the western edge of the cemetery and, as a result, enhance the character of the conservation area.

4.64 Financial contributions will be sought for enhancements to Brompton Cemetery where directly relevant and in scale and kind to any development proposals.

Key Principle UF21:
All proposals will be expected to demonstrate that they do not have a negative impact on the views identified and analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. Therefore all applications must be accompanied by a set of verified views from the points identified in that document and a thorough analysis of the impact that proposals will have on them.

Where a scheme has a specific impact, not already covered by the Townscape and Visual Analysis SPD Supporting Evidence Document, further verified views will be sought.

4.65 As set out in the Townscape and Visual Analysis SPD Supporting Evidence Document, there are a limited number of exceptional views within the OA’s surroundings from which it will not be appropriate for any new building to be visible on the skyline. However, for the majority of the views, the authorities may accept some new visible buildings if acceptable urban design justification is provided. This justification should address how the alignment, spacing, height, bulk, silhouette, massing and design quality of proposals will be combined to enhance the skyline.
Skyline

**Key Principle UF22:**
Where tall buildings are visible on the skyline they should enhance legibility by marking the presence of a significant, London-wide public function/destination.

4.66 The Empress State Building is visible on the skyline in a significant number of the views analysed in the Townscape and Visual Analysis SPD Supporting Evidence Document. It therefore has the potential to work as a successful landmark, signifying the location of the redevelopment within the OA. In light of this, it may be appropriate to locate a new public destination at the base of the Empress State Building to give meaning to its height and presence on the skyline. This relates to the requirement set out in the Culture Strategy (Chapter 8) to create a new significant cultural destination.

**Key Principle UF23:**
All buildings that are significantly taller than their surroundings will be expected to address the following four design aspirations:
1. slenderness;
2. how the building meets the sky;
3. how the building meets the ground; and
4. articulation of the facade.

**Key Principle UF24:**
In any proposal that retains the Empress State Building it should be integrated into an attractive composition of new tall buildings that form a cluster around it.

4.67 Tall buildings should be designed to appear slender and their massing should be proportionate to their height. Large slab blocks with continuous flat tops are discouraged. One way of achieving a slender appearance is to reduce the massing or floorplates of tall buildings as they rise. However, this is not always a guarantee of success.

4.68 The ways in which tall buildings meet the sky will be of particular importance when considering their impact on the skyline. A distinctive and well designed ‘top’ can help to give identity to a tall building and therefore avoid anonymity. However, when a tall building is part of a cluster, it is the grouping of the buildings and the way in which they read together, that will be the...
Skyline

primary source of local distinctiveness. Therefore, for a cluster of tall buildings, attention should be paid to the profile of the top of each building within the context of the whole cluster.

4•69 Clusters of tall buildings can be attractive as they can provide context for one another. If a number of tall buildings are proposed, a cluster is preferable to an approach that sees them scattered across the OA with no relation to one another. However, a cluster will only be visually attractive if the tall buildings are designed as a whole composition. Their location relative to one another is therefore as crucial to their potential success as the design of the individual buildings themselves. Whilst the lower levels of the individual taller buildings that form a cluster may be largely solid, it is important that their upper levels are variable, with plenty of sky visible between them. This will avoid a visual merging of the cluster into a ‘solid wall’ of several buildings each of similar form and height.

4•70 The three dimensional analysis undertaken as part of the Development Capacity Scenarios testing exercise revealed that the most appropriate location for additional tall buildings in the OA is within the vicinity of the Empress State Building. It also showed the potential for new buildings within the vicinity of the Empress State Building to enhance its visual impact on the skyline through variations in height, silhouette, profile and orientation.

4•71 The ways in which tall buildings meet the ground is also an important design consideration. If a tall building is treated as a ‘stand alone’ building it can present difficulties in achieving active frontages on all sides at ground level. This can be avoided by integrating tall buildings into a street, either with the lower storeys forming part of the street ‘terrace’ or with the lower levels forming a podium from which the tall element rises. Integrating tall buildings into a street gives the potential for the roof areas of the lower storeys to be used as roof terraces for the tall building’s users. Given the emphasis in this SPD on the extension of the existing urban grain, this street based approach is likely to be the most successful for any redevelopment of the OA.

4•72 However, whichever approach is taken tall buildings must appear ‘well rooted’ and their design must mediate between the large scale of the building itself, and the human scale of the public realm to which it relates. Active ground floor uses are essential. Tall buildings can also impact on the microclimate at street level. Their location and design must successfully mitigate for these effects.

4•73 The visual impact of tall buildings cannot be assessed in terms of bulk and massing alone. They must also be of excellent architectural quality. The facades of tall buildings need to be particularly carefully articulated and animated. This can be achieved through the use of materials, colour, fenestration, reflectiveness and/or the expression of depth. Blank walls must be avoided. The authorities must be satisfied that any outline planning application for the OA that includes tall buildings as important elements within a robust and credible masterplan also puts in place parameters and design principles that will result in excellent urban design and architecture. In order to ensure that the commitment to high quality can be realised through proactive control of reserved matters, the authorities will make these parameters and design principles a condition of any outline consent.

Key Principle UF25:
Proposals for tall buildings should indicate how their impact on microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunications interference will be mitigated.

4•74 All applications will be expected to include analysis of daylight, sunlight and the overshadowing of surrounding open spaces and should demonstrate that they do not have a detrimental effect.
Edges

Create a ‘Metropolitan Face’ fronting onto the A4

Create new private rear gardens adjacent to the existing private rear gardens on Philbeach Gardens and Eardley Crescent

Provide better enclosure of the cemetery

Create a new civic space adjacent to North End Road to accommodate the street market should it relocate

Frontage onto Seagrave Road

‘Metropolitan Face’ fronting onto the A4

Edge with potential to improve the enclosure of Brompton Cemetery

Repaired frontage onto North End Road creating two sided shopping street

Potential for important entrance building on Warwick Road

Potential private / communal gardens within new urban blocks on the edges of the OA

Potential new blocks on the edges of the OA

Underground Stations

Overground Station

The OA

Figure 4.19: Illustrative diagram showing proposals for development on the edges of the OA
Key Objective
Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context.

Edges

4.75 Development around the edges of the OA will be expected to respond to a number of existing conditions including:
• the heights of adjacent buildings;
• the existing terraces and mansion blocks that need to be brought into new urban blocks;
• the widths of existing streets;
• the existing private rear gardens;
• the proximity to conservation areas; and
• the proximity to listed buildings or heritage assets.

Key Principle UF26:
The height and massing of new buildings on the edges of the OA will be expected to respect the scale and massing of neighbouring buildings.

4.76 In the southern part of the OA, the edge conditions along Seagrave Road and the openness of views from the Brompton Cemetery are major influences on acceptable building heights and massing. Currently, this part of Seagrave Road largely comprises of 3 storey buildings rising slightly to a maximum of 5 storeys at the northern end. On the RBKC side of the railway line there is a 5.5 storey building.

4.77 There is a strong context to the west of the OA, to which development will be expected to respond. This is created by North End Road and the streets adjoining it. Building heights and typologies in these streets tend to be consistent. Many of these streets are also within conservation areas.

4.78 On the eastern edge of the OA the terraces of Philbeach Gardens and Eardley Crescent exhibit consistent scale and building typologies which are characteristic of much of the area further east. However, there are also a number of mansion blocks of a larger scale which front Warwick Road. The majority of the buildings to the east of the OA are included within conservation areas.
Edges

4.79 Given the strongly defined character that exists to both the western and eastern edges of the OA, any proposed buildings in these locations should not rise significantly higher than the prevailing adjoining heights. Furthermore, in order to help the proposed buildings successfully integrate into their surroundings, they should also reflect the characteristics of nearby streets and buildings.

4.80 In the north of the OA, development will be expected to create a ‘Metropolitan Face’ which responds to the strategic importance of the A4 as a route into and out of Central London. The built form of the Metropolitan Face should create a strong edge to the A4. This may require some relatively tall elements, including potential ‘gateway’ landmark building(s) at the main entrance to the OA. However, the elevation onto the A4 should not become an oppressive ‘mono-facade’. Instead, it must preserve or enhance the setting of the Baron’s Court Conservation Area and respond to local topography and character. Gaps between buildings and profiled facades should be used in order to avoid the creation of a wall of monolithic development.

4.81 The treatment of the Empress State Building and any new buildings within its vicinity will be particularly important in terms of their impact on the setting of the terrace of listed houses on Lillie Road. The height and massing of any proposed buildings in this area must take account of the impact they will have on near views as well as their relationship with the attractive composition required in Key Principle UF24.

4.82 Existing building lines create a setting for the public realm, particularly for listed buildings and conservation areas and should therefore be respected. This is particularly important for the terrace of listed buildings on Lillie Road, which could be harmed by new buildings that do not follow the same building line.

Key Principle UF27:
Development will be expected to preserve or enhance the character, appearance and setting of any listed buildings or conservation areas around the edges of the OA.
### Edges

**Key Principle UF28:**
The privacy, daylight and sunlight of all existing and future buildings must be respected.

**Key Principle UF29:**
Sensitively incorporate the existing properties that remain on the edges of the OA into new urban blocks.

**Key Principle UF30:**
Development within the OA should not prejudice future development of other sites outside its boundary.

4.83 LBHF’s UDP Standard S13 (as amended in 2007 and 2011), Protection of Existing Residential Amenities, addresses potential loss of outlook, loss of privacy, noise and disturbance from roof terraces and balconies and aspect. Any application for regeneration within the OA must demonstrate that full regard has been paid to these standards.

4.84 RBKC’s Core Strategy (2010) also identifies the importance of residential amenity and Policy CL5 requires all new buildings to ensure that “the conditions of existing adjoining buildings and amenity spaces are not significantly reduced”. It also requires “reasonable visual privacy for occupants of nearby buildings” and “that there is no harmful increase in the sense of enclosure to existing buildings”.

4.85 Existing properties on the edges of the OA and their relationship with any new development should be treated sensitively. Where the back gardens of existing buildings occur on the boundary of the OA, they should be incorporated into new urban blocks. Any proposals for the OA should demonstrate due regard for the access requirements and boundary locations of existing private rear gardens. Either new ‘back-to-back’ private gardens or semi private communal gardens, which are only accessed by the residents of the new adjoining properties, should be introduced between the new buildings and the existing rear gardens.

![Diagram](image.png)

Figure 4.24: Illustrative approach to sensitively incorporating the Lillie Road terrace (made up of listed buildings and buildings of merit) into a new urban block.
Key Objective
Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

4.87 There are a number of different streets in the OA’s surroundings. Although there are differences between them, which make different neighbourhoods identifiable, there are also a number of similarities. In order to integrate the OA into its surrounding context successfully, the design of new streets should also adopt these common features.

Key Principle UF31:
The widths of the streets should be proportional to the heights of the buildings that frame them. In general, no street should have an ‘enclosure ratio’ narrower than 1:1. In other words, no buildings should be taller than the width of the street onto which they front.

4.87 In order to design a successful street, it is important that the heights of buildings are proportional to the width of the streets onto which they front. This relationship is known as the ‘enclosure ratio’, which is usually expressed as:

‘building height : street width’.

4.88 Successful enclosure depends upon the type of street being designed. For example, some Secondary Streets should have generous proportions whilst, in general, all Tertiary Streets should feel more intimate. The following enclosure ratios were found in the OA’s surroundings:

- Primary Streets have the most generous proportions, tending to range between 1:1.25 and 1.5:4 (the street is wider than the buildings are tall);
- Secondary Streets tend to range between 1:1.2 and 1:3.2 (the street is slightly wider than the buildings are tall); and
- Tertiary Streets have the most intimate proportions, tending to range between 1:0.8 and 1:1.9 (the street width and buildings heights are roughly the same).

4.89 As a general rule across the OA, it is considered that any enclosure ratio less than 1:1 would not be in keeping with the existing character of the area and would risk feeling oppressive or ‘canyon-like’ and/or having restricted daylight/sunlight. Therefore, any street that breaks this rule will require significant urban design justification.

4.90 In order to achieve appropriate enclosure ratios, ‘shoulder heights’ may be used. The shoulder height of a building is the line above which the top storeys are set back, thus reducing their visible impact at street level. A general limit of one storey above shoulder height will be expected across the OA. Any further storeys above shoulder height will need to be justified in relation to street proportions and design. Plant should be included within the overall design of buildings and not simply added to rooftops.

Key Principle UF32:
The heights of buildings and the widths of streets will be expected to vary according to street type.

4.91 In the OA’s surroundings, the Character Area Analysis showed that street widths (building front to building front) tend to fall into the following broad range:

- Primary Streets: from 16m to 60m (the majority fall between 16m and 27m);
- Secondary Streets: from 15m to 24m; and
- Tertiary Streets: from 6m to 18m (the majority fall between 6m and 9m).

4.92 As the cross sections in Figures 4.25 to 4.27 demonstrate, achieving enclosure ratios no narrower than 1:1 need not result in monotonous streets if the heights of the buildings and the widths of the streets vary in response to street type. Streets that are likely to accommodate high levels of movement and activity should be wide, with higher buildings, whilst local streets should be narrower with lower buildings.

4.93 Buildings along a whole street, or on either side of the street, do not have to have exactly a same height. A level of variation is possible within the general 1:1 proportion.
Streets

Figure 4.25: An illustration of a wide street with a mix of uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

Figure 4.26: An illustration of a medium width street with only residential uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.

Figure 4.27: An illustration of a narrow street with only residential uses that achieves an enclosure ratio of 1:1. For illustrative purposes only.
Streets

4.94 The importance of appropriate enclosure ratios is applicable to open spaces as well as streets. As outlined in the Character Area Analysis, the existing garden squares in the OA’s surroundings tend to be framed by residential buildings that are broadly between 15m and 26m in height (from street level). Using 21st Century floor to ceiling heights, this equates to roughly 5 to 8.5 residential storeys.

4.95 The open spaces themselves tend to be between 35m and 65m wide and 50m and 115m long. Their enclosure ratios are generally between 1:3 and 1:7. Figures 4.28 and 4.29 show examples of the enclosure ratios found in local garden squares. For more examples and further analysis, please refer to the Character Area Analysis.

4.96 All open spaces proposed for the OA, not just the garden squares, but also those that make up the offer of a 2ha local park, will be expected to meet similar enclosure ratios. They will also be expected have similar dimensions and any buildings fronting onto them will be expected to be similar in height to those identified in the Character Area Analysis. Any open spaces that differ significantly from those found in the surrounding area in terms of spatial dimensions, the heights of surrounding buildings and/or enclosure ratios will require significant urban design justification.
Key Principle UF33:
The buildings that frame the streets and open spaces within the OA should create strong, consistent building lines with boundary treatments that are appropriate to the use found within them.

4.97 The streets in the OA’s surroundings tend to have strong and consistent building lines. They should be replicated within the OA.

4.98 For residential buildings, strong building lines should be created on the back edge of footways by formal boundary treatments surrounding small front gardens or ‘residential threshold spaces’ (see Figure 4.30). This would ensure that residential buildings have sufficient privacy.

4.99 Non residential buildings, including shops and offices, should also have strong building lines but need not have threshold spaces. Instead, the building lines could be created by the frontages of the buildings themselves. This would give the shops and businesses a strong street presence and would create the opportunity for appropriate non-residential uses to spill directly into the public realm, provided they do not obstruct pedestrian movement.

4.100 Building lines may vary to a degree between terraces or between urban blocks. Any proposals that include variations other than this will be expected to include a full urban design justification.

Key Principle UF34:
Arbitrary variations in roofscapes should be avoided. Instead, roof lines should be strong and should demonstrate regular rhythms.

Key Principle UF35:
Building blocks that are both long and high are not appropriate. Bulk and scale should be broken down by the grid of streets and other articulation.

4.101 The roofscape of an urban environment is the pattern created by the articulation of the rooftops. The Character Area Analysis identified that the roofscapes of the Victorian and Edwardian building typologies surrounding the OA are generally consistent. In some cases this means that they are simple, with very little visible articulation above the parapet lines (see Figure 4.32), in other cases they are punctuated by a regular rhythm of architectural details like dormer windows (see Figure 4.33 overleaf). These sorts of patterns should be replicated and reinterpreted within the OA.
Chapter 04 | Urban Form Strategy

Streets

Key Principle UF36:
All proposals for regeneration within the OA will be expected to demonstrate a comprehensive, holistic approach to street design that treats streets as places where people will want to spend their time and that encourages cyclists and pedestrians.

4.102 Variation in mid terrace should be part of an overall composition and should not be arbitrary. Variations could occur between urban blocks or across streets. Roofscape across the OA should not be monotonous. Instead, they should vary according to land use or street type.

4.103 Where other occasional, subtle variations do occur they should signify important public functions or punctuate important parts of the urban grain like key nodes and corners.

4.104 Consistency in roofscape should be applied to shoulder heights as well as rooftops. Wherever possible, plant should be integrated into the design of the main building rather than located conspicuously on rooftops.

4.105 Where appropriate, any accessible roof spaces should be used as terraces or roof gardens that contribute to amenity space and ecology. Any appropriate roof spaces that are not accessible should be treated as green or brown roofs.

4.106 Any application for the OA will be expected to demonstrate that it is fully accessible, in compliance with London Plan Policy 7.2, ‘An Inclusive Environment’.

4.107 All reserved matters applications will be expected to include a streetscape strategy.

4.108 Streets should not just be routes for movement, but should also be places where people want to dwell. As a result, good, unified street design that avoids all unnecessary street clutter is crucial.

4.109 The design of some streets should include regular rhythms of street trees. Street trees play an important role in the perception of a pleasant pedestrian experience. They contribute to street enclosure, reduce the visual impact of taller buildings and parked cars, provide shade and shelter and demarcate the footway. Street trees could also help to integrate the new neighbourhood into its existing context. All tree species selected for the new streets within the OA should be demonstrably similar to those found in the existing context.

4.110 All street trees will be expected to allow sufficient headroom for pedestrians and cyclists, avoid ‘cluttering’ the unobstructed pedestrian zone and ensure that visibility for street users is not compromised.

4.111 In order to encourage walking:
• ensure that all footways include an unobstructed zone reserved for pedestrian movement;
• avoid extensive pedestrianisation as the activity generated by other road users contributes to the enjoyment and safety of pedestrians; and
• ensure that no footway is has a gradient steeper than 1:20 or 1:12 over short distances in extreme circumstances (as set out in ‘Inclusive Mobility’ (2005)).

4.112 In order to create cycle friendly streets that encourage cycling:
• ensure that there is direct cycle access to a suitable location near the entrance of all buildings, via clear and legible routes;
• sign routes to the most important locations;
• provide ample cycle parking that is convenient, easily accessible, covered, secure and attractive;
• incorporate safe cycle priority at busy traffic junctions; and
• use attractive, modern design solutions in order to raise the profile of cycling as a mode of transport.

Figure 4.33: Consistent roofscape with regular rhythm of dormer windows
Chapter 04 | Urban Form Strategy

Streets

Key Principle UF37:
Streets should be designed to keep vehicle speeds under 20mph.

4.113 Instead of introducing visually intrusive traffic calming measures, such as speed humps or chicanes that do not reflect the character of the surrounding streets, new streets should be designed from the outset to control vehicle speeds. Design features that naturally reduce vehicle speeds include:

- narrow carriageway widths;
- on-street parking;
- accommodating cyclists in the carriageway rather than in dedicated cycle lanes; and
- introducing changes in surface materials.

Key Principle UF38:
Ensure that all streets and public open spaces are addressed by the public fronts of buildings.

4.114 Buildings in the OA will be expected to have clearly identified backs and fronts. The backs should be private (for example private rear gardens or servicing areas) and the fronts should be public (for example front doors or shop windows). Urban blocks in the OA should be arranged so that all of the backs are in the centre of the block, facing and protecting each other and all of the fronts should address the public realm. This will ensure that the public realm is well overlooked and animated, whilst offering sufficient privacy for garden spaces or hiding unsightly activities.

Key Principle UF39:
Ensure that all streets and public open spaces are overlooked by the ‘active frontages’ of buildings, comprising frequent windows and entrances.

4.115 ‘Active frontages’ are defined here as those which contain frequent windows and entrances. Ensuring that public spaces are overlooked by active frontages provides ‘natural surveillance’ and therefore reduces both the incidence and fear of crime. As shown in Figure 4.34 one efficient way to achieve this principle is to ensure that all ground floor residential units have their own front door onto the street. However, this approach would not be suitable for mansion blocks as this typology should feature grand communal entrances. Where communal entrances are used, they must be accompanied by a high frequency of large windows overlooking the street.

4.116 Ground floors may be taller in proportion than the upper floors in order to create well proportioned elevations and allow long term flexibility.

Figure 4.34: A development at Mastmaker Road with individual front doors for every ground floor flat.

Figure 4.35: Mansion blocks at Queens Club Gardens with communal entrances and large, frequent windows overlooking the street.
Comprehensive redevelopment of the OA will need to be approached in phases. Each phase must contribute towards the appropriate Key Objectives and Key Principles from this SPD in order to ensure that the new and growing population can access the appropriate services and infrastructure. The following illustrations show how the Key Objectives and Key Principles could be delivered in different development parcels, and ultimately for the OA as a whole. They should not however, be treated as an illustration of phasing and no application will be assessed against them.

4.118 Development Parcel a (Seagrave Road):
- Parcel a has the potential to extend Merrington Road, Hildyard Road and Halford Road into the OA thus extending urban grain in an east-west grid of streets.
- Parcel a must deliver a publicly accessible green open space (possibly in the form of a garden square) within 100m walk of the majority of the residential units and, as set out in Key Principle UF17, proportionate to the needs of the new living and working populations.

4.119 Development Parcels b and c:
- The design of both parcels b and c must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Both parcels b and c have the potential to deliver new north-south connections into the OA from Lillie Road.
- Parcel b has the opportunity to replicate the crescent street form found in the neighbouring areas.
- Parcel c must deliver east-west connectivity across the entire OA from North End Road to Warwick Road during an early phase of development.
- This may involve creating a connection through the housing estates if they haven’t been redeveloped. Contingency plans will be expected to ensure this east-west connectivity is deliverable if comprehensive redevelopment of the OA does not happen.
- As set out in Key Principle UF17, parcels b and c should have proportionate publicly accessible green open space (possibly in the form of a linear park) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.
Illustrative Development Parcels

4•120 Development Parcels d and e:

- Parcel d must deliver an east-west connection from Star Road into the OA. As outlined under Key Principle UF4, this is considered to be a particularly significant link and its delivery will be expected as early as possible.
- The design of both parcels d and e must include the potential for integration into an orthogonal east-west street grid as it is delivered in other parcels.
- Parcel d should introduce a north-south connection from Lillie Road.

- Parcel d has the potential to extend Archel Road and Chesson Road into the OA, thus extending urban grain in an east-west grid of streets.
- As set out in Key Principle UF17, parcels d and e should have proportionate publicly accessible green open space (possibly in the form of garden squares) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.

4•121 Development Parcels g and h:

- Parcel g has the potential to extend Baron’s Court Road into the OA thus extending urban grain in an east-west grid of streets.
- Parcel h has the potential to extend Beaumont Crescent into the OA.
- As set out in Key Principle UF17, parcels f, g and h should have proportionate publicly accessible green open space (possibly in the form of a linear park or garden squares) to accommodate the new living and working populations. This should be distributed in a manner that ensures the majority of residential units are within a 100m walk from it.
- Parcel f should deliver a vehicular connection to the A4. Construction access from the A4 into the OA is likely to be required during the earliest phases of development.
- Parcel g should deliver a number of pedestrian and cycle connections from the A4 into the OA.
Figure 4.40: Adelaide Wharf by Olli Hellmann
(www.ooli-hellmann.com)
This chapter sets out the housing requirements in relation to estate regeneration, affordable housing, housing mix, housing size, housing space, amenity space and accessible housing. Policy and guidance on housing density requirements in the area can be found in London Plan Policy 3.4 and the Mayor’s draft Housing SPG 2011.

5.2 The area surrounding the OA is typically characterised by Victorian terraced housing and mansion blocks, which are generally owner occupied or privately rented. There are also some post-war housing estates located to the east and north of the OA and some modern purpose built residential premises to the north.

5.3 Within the OA, existing housing is primarily located within the West Kensington and Gibbs Green estates. Some of these properties are leasehold or freehold having been purchased under the ‘right to buy’ initiative. There is also some private residential accommodation located to the south of the OA on Empress Place, Lillie Road and Seagrave Road.
Policy Context

5.4 The Mayor’s London Plan (2011):
- ‘Optimising Housing Potential’ (Policy 3.4);
- ‘Quality and Design of Housing Developments’ (Policy 3.5);
- ‘Large Residential Developments’ (Policy 3.7);
- ‘Housing Choice’ (Policy 3.8);
- ‘Mixed and Balanced Communities’ (Policy 3.9);
- ‘Definition of Affordable Housing’ (Policy 3.10);
- ‘Affordable Housing Targets’ (Policy 3.11);
- ‘Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes’ (Policy 3.12);
- ‘Affordable Housing Thresholds’ (Policy 3.13); and
- ‘Existing Housing’ (Policy 3.14).

5.5 LBHF’s Core Strategy (2011):
- ‘Strategic Policy FRA’;
- ‘Strategic Site and Housing Regeneration Area 1 – FRA’;
- ‘Affordability’ (Policy H2);
- ‘Housing Quality and Density’ (Policy H3);
- ‘Meeting Housing Needs’ (Policy H4); and
- ‘Student Accommodation’ (Policy H6).

5.6 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision);
- ‘Earl’s Court Exhibition Centre’ (Policy CA7);
- ‘Strategic Objective for Diversity of Housing’ (CO6);
- ‘Housing Targets’ (Policy CH1); and
- ‘Housing Diversity’ (Policy CH2).

Figure 5.3: Photograph of a new housing development at Empire Square, Southwark. Photograph by Ivor Samuels
Estate Regeneration

### Key Principle HO1:
The authorities will require a comprehensive approach to the redevelopment of the OA and LBHF will expect comprehensive redevelopment to deliver estate regeneration.

#### 5.7
In 2007, the Government commissioned a study into the ‘Future of Social Housing’ by Professor John Hills. Many of the findings from this study reflect a national position of residualised social housing with concentrations of deprivation and social problems. Unemployment within the West Kensington and Gibbs Green estates is twice the borough average. Long term unemployment is especially problematic with 40% claiming benefits for longer than 6 months. 12% of the working age population claims Incapacity Benefit compared to a borough average of 6%. Housing Benefits claimants are at around 44% compared to a borough average of 25%. Referrals to both Child and Adult social care are significantly higher than in the rest of the borough. Residents on the estates suffer from a higher standardised mortality rate than the borough average.

#### 5.8
Like many residential estates built in the 1960s and 1970s, the estates also suffer from discontinuous internal roads and poor quality open space which is underused and poorly integrated within the surrounding area. The West Kensington Estate in particular, has large areas of underused communal land that is poorly laid out.

#### 5.9
This poor layout discourages pedestrian footfall which reduces natural surveillance, which may increase the occurrence and perception of crime.

Given the development aspirations of adjacent landowners, LBHF have been investigating the potential for the inclusion of the West Kensington and Gibbs Green estates within the wider development proposals. LBHF’s Core Strategy (2011), Strategic Site and Housing Regeneration Area – FRA 1 states that “Regeneration of the West Kensington, Gibbs Green and Registered Provider estates phased over up to 20 years will be considered as part of the comprehensive approach to the opportunity area”. Annex 1 of the Mayor’s London Plan identifies that the OA “presents a significant opportunity for regeneration comprising estate renewal” and that “A comprehensive approach should be taken to planning the future of the exhibition complex, the Transport for London Lillie Bridge Road depot, the local authority housing estates and other sites in the vicinity”.

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Figure 5.4: Photograph of a street within the West Kensington Estate

Figure 5.5: Photograph of garages within the West Kensington Estate
Estate Regeneration

5.10 With the future of the West Kensington and Gibbs Green estates in mind, LBHF is undertaking a review (known as the ‘Estates Regeneration Economic Appraisal’) of the economic benefits and disbenefits of the following four principle options:

- Minimum intervention;
- Minimal intervention and in-fill development;
- Comprehensive redevelopment as a standalone estate redevelopment; and
- Comprehensive redevelopment as part of a wider Earl’s Court masterplan development.

5.11 The initial conclusions are that estate redevelopment as part of a wider Earl’s Court masterplan development delivers the optimum benefits. LBHF, as landowner and being responsible for the estates as housing authority, has accepted and endorsed the conclusions contained within the Estates Regeneration Economic Appraisal, subject to the outcome of further consultation with local residents and any required consents from the Secretary of State.

5.12 One of the supporting evidence documents that accompanies this SPD is a Development Capacity Scenarios study. Scenario 1 in this study looks at a development scenario that does not involve the West Kensington and Gibbs Green estates whereas Scenarios 2 and 3 look at comprehensive redevelopment including the estates. A critique of each scenario is included in the study, which demonstrates that including the estates in comprehensive redevelopment has far greater benefits in terms of extending the urban grain, increasing public open space and improving connectivity.

5.13 The inclusion of the estates as part of a comprehensive phased redevelopment of the OA would provide opportunities for the re-provision of the existing estate housing as part of a wider mixed tenure development. This would foster the creation of more mixed communities, which is a key tenet of Planning Policy Statement 1 on Delivering Sustainable Development. The utilisation of these adjacent sites also provides better opportunities for getting an improved quality of social rented accommodation.

5.14 In consideration of the above, LBHF, as a planning authority, is of the opinion that any approach to comprehensive redevelopment of the OA should include the West Kensington and Gibbs Green housing estates. Planning obligations will be put in place to ensure the delivery of estate redevelopment as part of any comprehensive approach to development in the OA.

Key Principle HO2:
Any planning application involving the redevelopment of the Gibbs Green and West Kensington housing estates will have to demonstrate that the proposals would not result in any net loss of affordable housing measured by floorspace and unit numbers.

5.15 The Mayor’s London Plan 2011 Policy 3.14B states that the loss of housing, including affordable housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. LBHF will also require that there is no net loss in unit numbers, in order to provide comfort to residents who live in a property within the estates, that they will have the opportunity to remain within the OA.

Figure 5.6 Aerial photograph of the Seagrave Road carpark site
Estate Regeneration

Key Principle HO3:
Any planning application providing affordable units in order to facilitate the reprovision of housing for the residents of the West Kensington and Gibbs Green estate, should be accompanied by an assessment of need. This should demonstrate that any affordable housing being provided will be sufficient in terms of size and adaptation to cater for the needs of residents on the existing estates who have expressed a desire to remain in the area.

5.16 Direct 'like for like' reprovision of the social housing in the Gibbs Green and West Kensington estates would not address current issues of overcrowding and hidden households or necessarily meet the housing needs of existing tenants. LBHF will require any regeneration proposals to provide for the housing needs of the estates' existing tenants and to provide sufficient housing options for those existing leaseholders and freeholders who wish to stay to have the opportunity to purchase an equivalent property (in terms of bedroom numbers) to their existing property. The assessment of need must accompany any planning applications submitted to LBHF. Equality considerations would need to be considered as part of the assessment of need. Separately, any application proposing redevelopment of the estates or re-housing of residents would need to be accompanied by an Equalities Impact Assessment, which would assess the impact of any proposals against ‘protected characteristics’ as defined in the Equality Act 2010.

Key Principle HO4:
25% of all new housing on the Seagrave Road site should be social rented and include a mix suitable to facilitate the reprovision of housing for an identified proportion of residents of the West Kensington and Gibbs Green estates.

5.17 LBHF’s Core Strategy (2011) Policy on the OA Strategic Site states that “development proposals for Seagrave Road should provide for the opportunity to deliver approximately 25% of all housing as social rented housing, subject to estate regeneration coming forward, detailed analysis and viability”.

Key Principle HO5:
The Phasing Strategy required in Key Principle PS1 (see Phasing and Section 106 Strategy) should demonstrate that the phasing and re-housing for the redevelopment of the West Kensington and Gibbs Green estates minimises disruption to existing residents.

5.20 The Phasing strategy should seek to provide certainty and clarity of delivery on a phased basis. The strategy should enable the wider regeneration proposals to commence promptly and continue efficiently, with discreet sections of existing housing capable of being replaced and residents relocated with minimum disruption. As part of any estate regeneration programme, residents should only be expected to move once – from their existing property to a new one.

5.18 Seagrave Road is currently used as a car park for the Earl’s Court Exhibition Centres and is considered suitable for an early phase for redevelopment. It is therefore imperative that a certain quantum of the affordable housing provided on the Seagrave Road site is of a mix that reflects the needs of an identified proportion of the residents of the West Kensington and Gibbs Green estates, having regard to the requirements of Key Principle HO3.

5.19 In addition to this, affordable housing will be required to top up to the 40% affordable housing target identified in LBHF’s Core Strategy Policy H2, subject to viability.
Chapter 05 | Housing Strategy

Tenure Mix

5.21 Policy 3.12A of the Mayor’s London Plan (2011) states that “the maximum reasonable amount of affordable housing should be sought”, having regard to current and future affordable housing requirements, affordable housing targets, the need to encourage rather than restrain development, the need to provide mixed and balanced communities, the size and type of affordable housing needed in particular locations and the specific circumstances of individual sites.

Key Principle HO6:
In LBHF, 40% of all new housing in the OA should be affordable, subject to viability. The priority will be the replacement of the existing social rented accommodation to meet the needs of the existing residents of the two housing estates. The remainder of the affordable housing should be intermediate or affordable rented.

5.22 LBHF’s Core Strategy (2011) Policy H2 states that 40% of residential units on sites with the capacity for ten or more self contained dwellings should be affordable, with a preference for “all additional affordable housing to be intermediate and affordable rented housing unless a small proportion of new social rented housing is necessary in order to enable proposals for the regeneration of council or housing association estates”, as is the case in the OA.

Key Principle HO7:
In RBKC, 50% of all gross external residential floorspace above 800sqm should be affordable and provided on site within RBKC, subject to viability. A minimum of 15% of the affordable housing provision should be intermediate, with the remainder being social rented housing.

5.23 RBKC’s Core Strategy (2010) states at paragraph 10.3.12 “Earl’s Court must retain the diversity of housing tenure which it currently enjoys. Residential development in Earl’s Court must deliver a mix of housing to reflect local and boroughwide need.” The delivery of affordable housing forms part of the Vision for Earl’s Court at paragraph 10.2, supported by Policy CP10 and CA7(q). Policy CH2i requires “developments to provide affordable housing at 50% by floor area on residential floorspace in excess of 800sqm gross external area”. Where less than 50% is provided it must be demonstrated that this is the maximum reasonable amount of affordable housing through an agreed viability assessment.

5.24 The Government has recently introduced a new affordable housing tenure, known as Affordable Rent. This tenure is different to social rented and intermediate housing. It is not captured in RBKC’s Core Strategy (2010) as it was introduced following the adoption of the Core Strategy. RBKC has recently adopted an interim policy for calculating Affordable Rent contributions in RBKC. This interim policy is a material consideration in the determination of planning applications and is available from RBKC Housing Department.

Key Principle HO8:
Intermediate housing should provide for a broad range of affordability and tenure types.

5.25 The authorities will expect intermediate products to be targeted at a range of affordabilities, having regard to the requirements of para 3.61 of the Mayor’s London Plan (2011), Policy H2 of LBHF’s Core Strategy (2011), Policy CO6, Policy CH2r and para 35.3.14 of RBKC’s Core Strategy (2010). Any intermediate housing will be expected to cover a variety of intermediate products, including shared equity, key worker, discounted market sale/rent and shared ownership, with a particular focus on products that allow for ownership and access to the property ladder.
Tenure Mix

Key Principle HO9:
To ensure diversity of housing and the delivery of a balanced community, the affordable housing must be tenure blind in terms of the external appearance of the buildings, entrance arrangements and amenity. Any affordable housing should be distributed by building or by block throughout the OA.

Key Principle HO10:
The authorities will require that any detailed or reserved matters applications for each phase of the development should include an Affordable Housing Plan, which must set out the affordability, location, tenure mix and unit size of any proposed affordable housing within the phase.

Key Principle HO11:
The authorities will control the affordability of any affordable housing.

5.26 The Mayor’s London Plan (2011) Policy 3.5 states that “Housing developments should be of the highest quality internally, externally and in relation to their context.” Para 3.76 of the Mayor’s London Plan (2011) and para 1.3.13 of the Mayor’s draft Housing SPG (2011) state that schemes should be designed so that all affordable housing units have the same external appearance and entrance arrangements as the private housing.

5.27 Both LBHF’s and RBKC’s Core Strategies require affordable housing and market housing to be integrated in any development and to have the same external appearance (RBKC Policy CH2n and LBHF para 9.30). Furthermore, RBKC’s Core Strategy (2010) Policy CH2 requires the affordable and market housing to have equivalent amenity in relation to factors including views, daylight, noise and proximity to open space, playspace, community facilities and shops.

5.28 In order to deliver Key Principle HO9 and ensure that any redevelopment of the OA delivers mixed and diverse communities, the authorities will expect any detailed or reserved matters applicant to submit an Affordable Housing Plan. This would contain details on the affordability, tenure mix, unit size and spread of different housing tenures through each phase of development. The authorities will look to ensure that as much as possible, affordable tenures are integrated with market tenures, as per the requirements of HO9.

5.29 The authorities will consider mechanisms to ensure that the affordability of affordable housing costs are not compromised by excessively high service charges or maintenance rates. Housing should be designed to provide for ease of maintenance for low cost home ownership. Providing buildings or blocks of exclusively affordable homes, as outlined in Key Principle HO9, will help to minimise service charges for residents. Further it will assist with tenancy management and internal building management. This also allows for single decants and importantly enables communities to stay together. Applicants will be expected to provide information on the ‘weekly cost to occupier’ of the proposed affordable units, including realistic and affordable service charges. For intermediate housing, annual housing costs (including service charge) should be no greater than 40% of net household income.
Housing Sizes

5.30 The Mayor’s London Plan (2011) Policy 3.8 states that “Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments”. LBHF’s Core Strategy (2011) Strategic Objective 2 and Policy H4 place particular emphasis on the need for family sized housing. RBKC’s Core Strategy (2010) Policy CH2a requires “new residential developments to include a mix of types, tenures and sizes of homes to reflect the varying needs of the borough, taking into account the characteristics of the site and current evidence in relation to housing need”. Paragraph 35.3.10 sets out indicative house sizes (see below) but acknowledges that it would be unrealistic to expect all housing schemes to comprise dwellings built to these exact ratios.

Social Rented Housing Sizes

Key Principle HO12:
In LBHF, the social rented housing mix should mirror that identified in the Assessment of Need, produced in accordance with Key Principle HO3. In RBKC, the social rented housing mix should aim for a minimum of 55% 3 and 4 bed with the remainder being 1 and 2 bed.

5.31 In LBHF, the size of the units required to enable the regeneration of existing housing estate properties will be dependent on the assessment of need. This issue is covered in more detail in the preceding section on estate regeneration.

5.32 RBKC has a significant shortage of larger social rented properties. Paragraph 35.3.10 of RBKC’s Core Strategy (2010) identifies an ideal mix as 70% 1 and 2 bed, and 30% 3 and 4 bed. Intermediate products should be offered at the ‘usefully affordable’ point.

Intermediate Housing Sizes

Key Principle HO13:
The intermediate housing mix must have regard to the local and strategic housing need assessments and the advice of the boroughs’ and GLA’s Housing Departments.

5.33 LBHF’s policy for intermediate housing mix is based on the Mayor’s Housing Strategy (2010) (Policy 1.1C) which states that “…by 2011, 16% of intermediate homes should have three bedrooms or more”. The split between one bed and two bed intermediate properties is not set within the Mayor’s Housing Strategy (2010), but LBHF will expect a significant proportion of the intermediate properties to be two bed, which reflects the needs and aspirations of people on the H&F Homebuy register.

5.34 RBKC has a shortage of intermediate homes, but because of land values, the preference is for smaller properties, as larger homes become ‘unaffordable’ to the intermediate housing market. Paragraph 35.3.10 of RBKC’s Core Strategy (2010) identifies an ideal mix as 70% 1 and 2 bed, and 30% 3 and 4 bed. Intermediate products should be offered at the ‘usefully affordable’ point.

Market Housing Sizes

Key Principle HO14:
Development proposals within the OA will be expected to provide a range of market housing unit sizes, especially the provision of larger family sized units (3 bedrooms or more), having regard to the London Strategic Housing Market Assessment 2008 and both LBHF and RBKC Core Strategies.

5.35 The London Strategic Housing Market Assessment 2008 shows the market housing demand to be 39% 1 bed, 47% 2 bed and 14% 3 bed. Para 35.3.10 of RBKC’s Core Strategy (2010) shows the demand for market housing in RBKC over the next 20 years to be 20% 1 and 2 bed units and 80% 3 and 4 bed units. Therefore, on the basis of this evidence, both LBHF and RBKC would expect to see a mix of market unit sizes with a significant quantity of larger family sized units (3 bedrooms or more) and also consider the needs of extended families.
Alternative Accommodation

### Key Principle HO15:
Any application for comprehensive development should provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students.

5.36 In addition to conventional residential accommodation, a variety of other accommodation offers should be provided through any redevelopment proposals, such as student accommodation and Extra Care Housing. This is supported by Policy CH2 of RBKC’s Core Strategy (2010), which “encourages extra care housing, particularly in the south of RBKC” and by Policies H4 and H6 in LBHF’s Core Strategy (2011), which support applications for housing for people who need care and support and applications for student housing in the OA respectively. Any older people’s housing should be provided on the same basis of affordable to market housing as set out in Key Principles HO6 And HO7.

### Key Principle HO16:
All new housing should accord with the standards in the Mayor’s London Plan (2011) and the Mayor’s draft Housing SPG (2011).

5.37 The Mayor’s London Plan (2011) includes minimum space among other design standards for all new housing (Policy 3.5). The Mayor’s draft Housing SPG (2011) expounds Policy 3.5 of the Mayor’s London Plan (2011) and reflects aspects of the Mayor’s Housing Design Guide (2009). Para 35.3.13 of RBKC’s Core Strategy (2010) states that the standards in the Mayor of London’s Housing Design Guide “will inform requirements within the Borough”.

5.38 Any development proposals within the OA will need to have regard to the Mayor’s draft Housing SPG (2011) standards, including the minimum amount of internal floor area (GIA). Table 3.3 of the Mayor’s London Plan (2011) is shown here in Table 5.1. In addition to this, wheelchair accessible dwellings in RBKC will need to meet the minimum floorspace requirements in the RBKC Access Design Guide, 2010.

### Table 5.1: Minimum internal floor areas as set out in Table 3.3 in the Mayor’s London Plan (2011)

<table>
<thead>
<tr>
<th>Dwelling Type (bedroom/persons)</th>
<th>Essential GIA (sqm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flats 1p</td>
<td>37</td>
</tr>
<tr>
<td>1b2p</td>
<td>50</td>
</tr>
<tr>
<td>2b3p</td>
<td>61</td>
</tr>
<tr>
<td>2b4p</td>
<td>70</td>
</tr>
<tr>
<td>3b4p</td>
<td>74</td>
</tr>
<tr>
<td>3b4p</td>
<td>86</td>
</tr>
<tr>
<td>3b6p</td>
<td>95</td>
</tr>
<tr>
<td>4b5p</td>
<td>90</td>
</tr>
<tr>
<td>4b6p</td>
<td>99</td>
</tr>
<tr>
<td>Two storey houses 2b4p</td>
<td>83</td>
</tr>
<tr>
<td>3b4p</td>
<td>87</td>
</tr>
<tr>
<td>3b5p</td>
<td>96</td>
</tr>
<tr>
<td>4b5p</td>
<td>100</td>
</tr>
<tr>
<td>4b6p</td>
<td>107</td>
</tr>
<tr>
<td>Three storey houses 3b5p</td>
<td>102</td>
</tr>
<tr>
<td>4b5p</td>
<td>106</td>
</tr>
<tr>
<td>4b6p</td>
<td>113</td>
</tr>
</tbody>
</table>

5.39 Whilst it is noted that these are minimum standards, there is an expectation that where they are exceeded, the vast majority of dwellings will not be greatly in excess of these standards. There is market demand for exceptionally large dwellings, particularly in Kensington. It is fair that some dwellings are provided for this market. However, the over-riding priority is to provide dwellings of a size that meet the expectations of the vast majority of Londoners, to contribute to addressing the chronic shortage of ordinary-sized housing across London.
Amenity Space

Key Principle HO17:
All new homes must be carefully designed and laid out to have satisfactory access to gardens or other outdoor amenity space. Family dwellings at ground or podium levels should have access to private gardens. Balconies may be provided where appropriate subject to design, location and context (e.g. overlooking shared private space).

5•40 The Mayor’s draft Housing SPG (2011) standard 4.10.1 sets out a requirement for a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm to be provided for each individual occupant.

5•41 The LBHF Unitary Development Plan (2007) requires residential accommodation at ground floor level to provide 36sqm amenity space for family units and 14sqm for non-family units. It is recognised that this standard may not be deliverable in higher density developments such as in this OA, although every effort should be made to achieve it. LBHF’s Core Strategy (2011) Policy H3 requires gardens and shared amenity space to be included within development proposals. RBKC’s Core Strategy (2010) Policy CH2 requires “housing schemes to include outdoor amenity space”.

Accessible Housing

Key Principle HO18:
A minimum of 10% of residential units in each borough must be wheelchair accessible.

5•42 Both boroughs’ Core Strategies require 10% of residential units to be wheelchair accessible and all new build dwellings to be built to “Lifetime Homes” standards (Policy CH2 in RBKC’s Core Strategy (2010) and Policy H4 in LBHF’s Core Strategy (2011)).

Key Principle HO19:
All residential units must be built to Lifetime Homes standards.

5•43 Within the West Kensington and Gibbs Green housing estates there are a number of disabled residents who live in wheelchair accessible units. Some of these units have been adapted to provide for particular disability needs, but other units have not been adapted because the existing home is not practically capable of adaptation.

5•44 Where a continued need exists, or indeed, where there is a new need arising from the estate residents, the priority in terms of accessible housing in LBHF should be the provision of the appropriate amount of wheelchair and adapted units in order to cater for the needs of these existing estate residents.

5•45 Beyond catering for the needs of the estate residents, there should be further provision of wheelchair accessible units to top up the overall provision across the scheme so that in total, wheelchair accessible dwellings constructed total at least 10% of all new residential dwellings in each borough. This top-up provision should be spread evenly across tenures, and across all Extra Care units constructed in the OA.

5•46 Further advice on achieving Lifetime Homes standards is set out in LBHF’s Access For All SPD and RBKC’s Access Design Guide SPD.

Figure 5.8: Photograph of a new housing development at St. Andrews, Bromley by Bow. Photograph by A&M Photography
06 EMPLOYMENT STRATEGY
Key Objective
Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

6.1 This Employment Strategy focuses on two aspects. First, it addresses the provision of a suitable quantity and variety of business floorspace, as this is likely to make the greatest contribution to the minimum new jobs target of 7,000. Second, it sets out the authorities’ strategy for securing employment and training across all employment sectors.

6.2 For the purposes of this SPD, business uses are defined as all those land uses within Class B1 of the Use Classes Order 2010, which covers offices (B1a), research and development (B1b) and light industrial (B1c). In addition to the business sector, jobs will also be created in culture and retail which will ‘count’ towards the 7,000 jobs total, but are not addressed in this chapter.

6.3 The OA currently contains two significant office buildings. The Empress State Building is the largest and most prominent of these, providing over 40,000sqm (GEA) of floorspace and is currently occupied by the Metropolitan Police. It was originally developed as a hotel in 1961 but subsequently converted to office use and was refurbished and extended by three floors between 2001 and 2003. The second office building is Ashfield House on the northern boundary of the site, which provides 8,600sqm (GEA) of floorspace and is currently occupied by Transport for London. In addition to this, the OA currently accommodates a number of small and ancillary office spaces including Clear Channel advertising on West Cromwell Road, the TfL Lillie Bridge Road Depot, the Earl’s Court Exhibition Centres, the Adel Rootstein Ltd light industrial premises on Beaumont Avenue and a number of small light industrial premises on Rickett Street and Roxby Place.

6.4 The Mayor’s London Plan (2011):
• ‘Offices’ (Policy 4.2); and
• ‘Improving Opportunities for All’ (Policy 4.12).

6.5 LBHF’s Core Strategy (2011):
• ‘Planning for the Location of Employment Activities’ (Strategic Policy B);
• ‘Strategic Site and Housing Regeneration Area – FRA 1’; and
• ‘Local Economy and Employment’ (Policy LE1).

6.6 RBKC’s Core Strategy (2010):
• ‘Earl’s Court’ (Policy CP10 and associated Vision);
• ‘Location of Business Uses’ (Policy CF5);
• ‘Earl’s Court Exhibition Centre’ (Policy CA7); and
• ‘Infrastructure Delivery and Planning Obligations’ (Policy C1).
Figure 6.1: Illustrative diagram showing the potential distribution of businesses the OA

**Mixed use clusters:**
- Potential for small and very small offices in mixed use buildings
- Potential for smaller and mid sized, flexible units in mixed use buildings
- Potential for larger footprint, discrete office buildings
Business Provision

Existing Businesses

Key Principle ES1:
Existing business floorspace in the OA should be renewed and modernised or replaced through development proposals to maintain and intensify existing employment provision. Applicants should establish the requirements of existing tenants through consultation and demonstrate how these have been taken into account in their proposals.

6.7 Office and light industrial based employment makes a significant contribution to employment provision in the OA. This existing employment base should be retained and expanded through modernisation or replacement of the existing stock. Applicants should consult existing office and light industrial tenants at an early stage to ensure that their requirements are taken into account in development proposals. This should include an assessment of the existing jobs provision and the quantum of business floorspace.

Future Business Floorspace Provision

Key Principle ES2:
Proposals in the OA should incorporate additional business floorspace totalling approximately 90,000 sqm (GEA) across the OA, primarily to meet local demand in both boroughs.

6.8 The Opportunity Area Office Study (2011) was commissioned to determine the scope for business provision in the OA having regard to the policy context and the supply of and demand for office floorspace at the local and sub-regional level. It considered a range of business floorspace provision in conjunction with the initial development capacity scenarios developed for the OA (please see Development Capacity Scenarios supporting evidence paper).

6.9 The study identifies a shortfall in the supply of business floorspace at a local level and at the wider sub-regional level, particularly in the central London sub-region. Supply constraints, particularly within Westminster, could mean that demand will be displaced to elsewhere in the sub-region. It is expected that schemes coming forward in the OA will contribute towards meeting the identified shortfalls in supply of business floorspace particularly at the local level and achieving the indicative new employment capacity of in excess of 7,000 new jobs.

6.10 The study establishes that additional business floorspace provision totalling approximately 90,000 sqm (GEA) across the OA will meet the local shortfall and some of the sub-regional shortfall without compromising other key principles in this document or LBHF’s or RBKC’s Core Strategies.

Nature and Phasing

Key Principle ES3:
New business floorspace should be phased so that up to half of the overall quantum is delivered in the early phases of redevelopment in the OA, with the remainder being provided in the later phases. Business floorspace in the early phases will need to incorporate provision for small and medium-sized enterprises. Applicants should have regard to the spatial distribution described below.

6.11 It is anticipated that sites in the OA will be developed on a phased basis over at least a twenty year period. The provision of the total amount of additional business floorspace envisaged in Key Principle ES2 too early in this period would risk undermining LBHF’s Core Strategy Strategic Policy B. The Opportunity Area Office Study (2011) identified the importance of establishing the OA as a new neighbourhood before it would be attractive for business occupiers in terms of accessibility, amenity and the nature of business accommodation provided. This will take time to establish and is particularly important in terms of attracting larger office
Business Provision

occupiers, who may be making a choice between a number of areas in London.

6.12 Therefore, business floorspace provision in the early phases of development will typically need to be flexible and smaller in scale in order to meet local need, particularly that of small and medium-sized enterprises. This should include small office buildings and business floorspace in mixed-use buildings. This type of provision can be readily integrated with residential, retail, leisure, cultural and community uses, which are anticipated to be the predominant uses in the early phases.

6.13 Business floorspace in the early phases should largely be focussed within the vicinity of the Empress State Building. Smaller concentrations of business floorspace might also be found near to transport hubs and on routes through the OA, where this does not conflict with residential uses. Spatial testing has identified that up to half of the business floorspace provision envisaged in Key Principle ES2 could be accommodated in these areas.

6.14 The remainder of the business floorspace will be delivered in the later phases and will typically comprise larger units and discrete office buildings. The authorities envisage that this type of accommodation will be focussed in the north of the OA fronting onto West Cromwell Road (A4). The Urban Form Strategy (Chapter 4) refers to this location as the ‘Metropolitan Face’ of the OA. It has the potential to offer an attractive and high profile location for larger office occupiers provided that it is integrated into the new neighbourhood created in the OA and benefits from the associated amenities.

Variety and Adaptability

6.15 Business units will need to be designed to be readily adaptable for use by a range of tenants, including single occupier and multi-let space at a variety of scales. The Opportunity Area Office Study (2011) identified that typical floor sizes in the order of 1,000 – 2,000sqm are most likely to be appropriate to meet demand arising at a sub-regional level, given the potential range of occupiers, although this may change over time. Provision for local demand will need to be smaller and more flexible, including a range of unit sizes typically below 1,000 sqm.

6.16 The early phases of development in both boroughs should provide for very small, small and medium-sized enterprises, including dedicated incubator units with shared central services. The authorities will secure affordable business space within this offer and will secure affordable space within mixed use and larger office proposals, which are likely to be more acceptable in later phases.

Key Principle ES4:
Development proposals for business floorspace should incorporate variety in the type, size, cost and terms (lease arrangements) of accommodation and be designed to be readily adaptable for use by a range of tenants. Provision of business space suitable for very small, small and medium-sized enterprises and incubator units to meet borough level demand will be expected in the early phases. Later phases should accommodate a variety of sizes of units but could include larger office floorplates over 1,000 sqm.

Key Principle ES5:
The authorities will secure the provision of affordable business space for very small, small and medium sized enterprises and incubator units across all phases of development.
Employment and Training

Protecting Existing Employment

**Key Principle ES6:** Any applications proposing the redevelopment of the OA must, in consultation with the Economic Development Teams of both boroughs, include measures, during and post construction, to protect businesses outside of the OA affected by development.

6.17 The hinterland surrounding the OA represents a significant source of existing employment and economic activity. Many of these employers have grown to serve the needs of the Earl’s Court Exhibition Centres. In the Earl’s Court ward alone there are 117 businesses and a workforce of 1,725 employees providing accommodation and food service activities.

6.18 Both boroughs will require steps to be taken to mitigate against the impact development will have on existing local employers brought about by the loss of the Earl’s Court Exhibition Centres and the period of construction. This should include sector specific support, improvements to neighbouring trading environments, training and retraining, contributions to commercial centres’ management and business engagement and consultation. Proposals must include a strategy demonstrating how the requirements of LBHF and RBKC have been met.

Local Procurement Opportunities

**Key Principle ES7:** Developers should put in place procedures to ensure small and medium sized local enterprises (local SMEs) have access to tender opportunities for the procurement of goods and services generated by the development both during and after construction, having regard to the councils’ Local Procurement Code of Practice.

6.19 The authorities will require the developers to champion the benefits of using local businesses in the supply chain and ensuring that a greater proportion of expenditure is retained in the local economy. Local businesses are more likely to employ local labour and will therefore increase the sustainability of the development by reducing travel distances.

6.20 The Councils have produced a joint Local Procurement Code of Practice, which requires developers and their contractors to agree policies and procedures with the boroughs’ Economic Development teams to ensure that local businesses have access to tender opportunities for the procurement of goods and services.

6.21 The Councils will regularly monitor the proportion of local procurement opportunities and will require any developer to submit information about contract tendering activity with local businesses and its outcomes. Information should be submitted from the developer in respect of contract tendering activity and the outcomes with regard to local businesses.

6.22 A financial contribution will be sought toward the costs of facilitating local procurement, which could include the establishment of a local enterprise screening service, brokerage with contractors and owners, periodic ‘Meet the Buyer’ and business briefing events, the maintenance of a directory of suppliers, support for businesses to become tender ready and performance monitoring. The mechanism for determining the level of contribution is set out in the Local Procurement Code of Practice.
Employment and Training

Variety and Adaptability

Key Principle ES8:
Applications for comprehensive redevelopment will be expected to deliver and any other applications will be expected to contribute towards:

• support and funding of Workplace Coordinators working within the developer’s project team to ensure that local people benefit from employment opportunities throughout the development;
• the provision of a recruitment & employability Construction Training Centre before and during construction; and
• the provision of a post construction standalone Recruitment and Job Shop in a focal point of the development.

6•23 Financial contributions will be sought from developers to fund Workplace Coordinators, in line with the principles of the councils’ joint Employment and Training Code. The postholders will work closely with and be located within the developer’s project team. The Coordinators will work to meet the identified employment needs of key partners, contractors and suppliers and coordinate links with external agencies to provide suitable candidates. The Councils consider this role to be critical in steering job opportunities towards local people and demonstrable practical gains should result from this initiative (i.e. in numbers of residents getting employment in the development). In addition the Councils see increasing employment opportunities for local people with disabilities, vulnerable groups, young offenders and those furthest from the labour market as equally important and the Workplace Coordinators will play a key role in delivering this.

6•24 Developers will be expected to provide a recruitment and employability Construction Training Centre in the OA before and during construction and a standalone Recruitment and Job Shop post construction, within a focal point of the development. The Recruitment and Job Shop should serve as a highly visible focal point for residents looking to undertake vocational skills training relevant to local job vacancies and obtain work experience and apprenticeship opportunities, as well as to assist employers in recruitment.

Local Employment Opportunities

Key Principle ES9:
Any applicant seeking permission for comprehensive redevelopment should agree to provide a Local Labour, Skills and Employment Strategy and a Local Labour, Skills and Employment Delivery Plan.

6•25 The authorities will seek the provision of a Local Labour, Skills and Employment Strategy and Delivery Plan as part of any planning agreement associated with any application for comprehensive redevelopment. Both documents would need to be produced by the applicant in close partnership with both RBKC and LBHF Economic Development teams in line with the principles of the Councils’ joint Employment and Training Code, which is available from either of the councils’ Economic Development teams.

6•26 The Strategy would need to incorporate predictions on labour demand, skills requirements, targeted recruitment drives, target-setting with contractors and subcontractors, mechanisms for monitoring employee and contractor employee residency data, jobs fairs, community and careers events and initiatives to increase employment sustainability for local people. In addition, it will be expected to include details of activity to support re-training of individuals affected by the closure of the exhibition centres, activity to provide professional input to career days, teacher training and work experience for young people from both boroughs.

6•27 The Delivery Plan should focus partnership efforts and incorporate complementary activity. This could include links with Job Centre Plus, local schools and colleges, adult education & learning services and Education Business Partnerships.
This chapter sets out the requirements for the location, capacity and type of retail provision in the OA. For the purposes of this SPD, retail uses are defined as all those land uses within Class A of the Use Classes Order 2010, which includes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés), A4 (drinking establishments) and A5 (hot food take-aways).

There are four designated shopping centres within the immediate vicinity of the OA. These are Fulham Town Centre and North End Road (West Kensington) Key Local Centre in LBHF and Earl’s Court Road Neighbourhood Centre and Old Brompton Road (West) Neighbourhood Centre in RBKC.

Further away from the OA there are several very important and successful higher order centres, such as Shepherd’s Bush, Hammersmith, Kensington High Street, and King’s Road. In addition to the local convenience function, these centres are also important comparison shopping destinations with a catchment that includes the OA.

7•4 The Mayor’s London Plan (2011):
- ‘Retail and Town Centre Development’ (Policy 4.7),
- ‘Supporting a Successful and Diverse Retail Sector’ (Policy 4.8), and
- ‘Small Shops’ (Policy 4.9).

7•5 LBHF’s Core Strategy (2011):
- ‘Hierarchy of Town and Local Centres’ (Strategic Policy C), and
- ‘Strategic Site and Housing Regeneration Area - FRA 1’.

7•6 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision),
- ‘Earl’s Court Exhibition Centre’ (Policy CA7),
- ‘Location of New Shop Uses’ (Policy CF1), and
- ‘Retail Development within Town Centres’ (Policy CF2).
Retail

Figure 7.1: Illustrative diagram showing the potential distribution of retail across the OA
Retail Capacity (Comparison)

Key Principle RS1:
Comparison retail demand generated by the new development should be accommodated within existing surrounding town centres. Any comparison retail that cannot be accommodated within existing surrounding town centres should primarily be provided along North End Road, as an extension to Fulham Town Centre, where the potential for an anchor store should also be explored.

7.7 The level of retail capacity deemed appropriate within the OA will be based on the ability of existing centres in the vicinity to soak up the identified need. Any retail proposals for development outside of these centres would need to demonstrate that the level of retail proposed is in accordance with the below capacity figures is for the day to day needs of the OA or is complementary to the cultural facilities, and cannot be accommodated in existing centres. Applicants should demonstrate flexibility in terms of scale and scope when showing what capacity the existing retail centres have to provide for the needs of new development in the OA.

7.8 The three authorities commissioned retail consultants, Roger Tym and Partners (RTP), to conduct a Retail Need Assessment for the OA, which reported in December 2010. This assessment considered the scale of existing expenditure and potential expenditure growth, in order to identify whether any new retail floorspace is needed in the wider Study Area (as shown on Figure 7.2). This Study Area includes several existing centres, such as Hammersmith Town Centre and Fulham Town Centre in LBHF and Earl’s Court Road, Fulham Road West, Kensington High Street, South Kensington and Fulham Road East (Brompton Cross) in RBKC.

7.9 RTP recognised a “quantitative need for between 34,100 and 38,200sqm gross of A Class (excluding A1 service and A2) floorspace by 2016, increasing to between 62,300 and 71,300sqm gross by 2021” for the entire Study Area. RTP advised that “there is physical capacity for growth in the centres within and outside the Study Area that could be used to absorb the growth identified”, which is consistent with the requirements of Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) and the policy context set out above. RTP also advised that “there is an opportunity for growth within the Opportunity Area through the masterplanning process”.

7.10 Any comparison retail proposed within the OA should be steered towards North End Road, where it will act as an extension to Fulham Town Centre. The provision of an anchor store in this location should be explored, which has the potential to draw more of a pedestrian footfall up from the Fulham Broadway end of Fulham Town Centre and help to invigorate the middle section of North End Road, where the vitality and viability of retail has struggled in recent years.
7.11 The primary focus for new retail floorspace should be within and adjacent to Fulham Town Centre. Through the regeneration of the OA, there is an opportunity to repair the existing gaps in the non-residential frontage along the eastern edge of North End Road in order to create a rejuvenated, two sided retail street.

7.12 Retail should then be steered towards North End Road (West Kensington) Key Local Centre and the areas where the highest levels of pedestrian activity are expected, such as around the Earl’s Court (Warwick Road entrance) and West Brompton Underground stations.

7.13 It is expected that the new centre within the OA will be of a local scale. The authorities would encourage the new centre to be located within the vicinity of the Empress State Building where it is also expected that the cultural facilities will primarily be located. This centre will therefore also have the potential to complement the new cultural facilities (please see Chapter 8).

7.14 Other non-residential uses such as offices, hotels and cultural and community uses would be appropriate in any of the retail locations identified above.

Impact of Retail

Key Principle RS3:
Applicants must demonstrate that any retail proposed within the OA has a minimal impact on existing centres surrounding the OA.

7.15 The location and scale of retail considered appropriate within the OA should be determined through a Retail Impact Assessment, prepared in accordance with PPS4 or successor national policy guidance and Policy 4.7 of the Mayor’s London Plan (2011). This must assess the amount of retail development that may be accommodated in particular locations, without having a negative impact on the existing centres in the wider area, and which will allow the existing centres to benefit from a significant proportion of expenditure growth.

7.16 New retail should be provided in a way that reflects the phasing of the redevelopment, taking into account the day to day needs of the rising residential and worker population. Too much retail provided too early in the development might harm existing centres. The phasing and timescales of the retail floorspace should be developed accordingly.

Key Principle RS4:
The provision of retail floorspace should reflect the phasing of the development and be related to the day to day needs of those living and working in the OA at each phase.
Chapter 07 | Retail Strategy

7.18 The retail units in the three existing retail centres in the vicinity of the OA primarily consist of ground floor premises within Victorian properties. As a consequence, the unit sizes within these premises tend to be relatively narrow, except where more than one have been combined. These narrow shop fronts create a varied and lively streetscape that is not overly dominated by one or two excessively large retail premises. The authorities wish to see this existing character used as a design precedent for any retail proposed within the OA. In order to create mixed and diverse communities, the upper floors should be predominantly residential, although some may be appropriate for offices. The width of the shop fronts should be reflected in the upper floors, providing vertical emphasis to the buildings.

7.19 The exception to this rule is in the extension of Fulham Town Centre in North End Road, where larger format retail units would be appropriate if commercially viable. Careful attention must be paid to their design to ensure they complement the existing character of the street.

Key Principle RS5:
The priority in terms of retail typology should be the provision of narrow fronted ground floor units that create a legible streetscape and provide in-built flexibility for expansion and reduction depending on market demands.

7.17 The authorities will control, through Section 106 agreements and planning conditions, the scale, nature and character of any retail proposed in the OA, in order to ensure that it does not have a detrimental impact on the existing centres and that it responds appropriately to the existing character of the OA and its surroundings. The primary mechanism that the authorities will employ in order to achieve this is to require the applicant to submit a Retail Management Plan, which through a planning agreement, would be a binding document within the terms of which the applicant would be required to operate. The Retail Management Plan will control issues such as:

- phasing,
- unit sizes,
- convenience/comparison split by floorspace,
- limitations on other retail-related uses (A classes),
- range and number of independent shops,
- triggers and sanctions to ensure delivery of an applicant’s retail concept,
- prohibition on mezzanines; and
- active frontages.

Key Principle RS6:
The authorities will control the nature of new retail proposed in the OA by securing a binding Retail Management Plan as part of any planning agreements.

Retail Controls

Figure 7.4: Local retail offer with active frontages
7.20 Smaller retail units tend to be occupied by independent retailers or ‘local’ shops, which both Councils encourage through any development proposals. Policy 4.9A of the Mayor’s London Plan (2011) para. 7.24 of LBHF’s Core Strategy (2011) and Policy CF2 of RBKC’s Core Strategy (2010) set out an expectation that affordable retail units should be secured as part of any large scale retail proposals. The authorities will expect an element of affordable retail to form part of any retail offer within the OA, which will be secured through any planning agreement.

7.21 North End Road Market currently operates as an on-street market on North End Road in Fulham Town Centre. Although the market currently creates a bustling atmosphere, its on-street location also increases traffic congestion on North End Road and reduces public safety. LBHF’s Core Strategy (2011) Policy FRA states that “relocation (of the market) to an off-street location should be sought, but dialogue should take place with street traders to ensure a logical solution that contributes to the wider regeneration of the area as a whole. The potential regeneration of the Opportunity Area may present new opportunities for relocating the market in the long term”.

7.22 Redevelopment of the OA provides an opportunity to consider relocating the market to within the OA, enhancing its attractiveness and securing its future provision, whilst maintaining its links with North End Road. Space for the relocated market could either take the form of a market square, a wider footway alongside a street or a covered market provided on a major pedestrian thoroughfare through a building. As part of this relocation, adequate facilities should be provided for the auxiliary needs of the market, such as the storage of temporary stalls, the collection of waste and the needs of delivery vehicles so that they do not clutter streets or inhibit other movement and permeability.

7.23 Any decision to relocate the market would be predicated on discussions between LBHF Council and street traders in order to ensure a workable solution. Were the decision to be made to not move the market to this location, the applicants would have the opportunity to put the allocated land to an alternative use. In this instance, LBHF would need to be satisfied that any alternative use would not impact negatively on the vitality and viability of the existing North End Road market.
Key Objectives

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor’s London Plan; and
- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl’s Court ‘brand’.

This chapter sets out requirements to create a cultural destination consisting of cultural facilities; associated uses, including artists’ studios and space for creative industries; public art and hotels.

8•1 Since the 1880s a variety of culture and entertainment activities, including various shows, exhibitions and a gigantic Ferris wheel, have taken place on the Earl’s Court site giving it its cultural ‘brand’. In the late 1930s, Earl’s Court Exhibition Centre 1 (EC1) was opened to provide over 50,000m2 of exhibition space. In the early 1990s Earl’s Court Exhibition Centre 2 (EC2) was opened. The Earl’s Court Exhibition Centres are internationally recognised for hosting significant cultural events, including the Brit Awards, world famous music concerts and various exhibitions / shows, such as the Ideal Home Show.

8•2 The Exhibition Centres will host the indoor volleyball during the 2012 Olympic Games, which will further reinforce Earl’s Court as an international cultural brand.

8•3 The Exhibition Centres make a significant contribution to the local economy, as many shops, restaurants and hotels in the surrounding area benefit from the close proximity to this major visitor attraction.

8•4 The Mayor’s London Plan (2011):
- Earl’s Court and West Kensington Opportunity Areas; and
- ‘Support for and enhancement of arts, culture, sport and entertainment provision’ (Policy 4.6).

8•5 LBHF’s Core Strategy (2011):
- ‘Strategic Policy FRA’; and
- ‘Strategic Site and Housing Regeneration Area – FRA 1’.

8•6 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision);
- ‘Earl’s Court Exhibition Centre’ (Policy CA7);
- ‘Creative and Cultural Businesses’ (Policy CF6); and
- ‘Arts and Cultural Uses’ (Policy CF7b).
Culture

Figure 8.2: Illustrative diagram showing the possible locations of cultural facilities.
A New Cultural Destination

**Key Principle CS1:**
Any redevelopment of the OA that involves the loss of EC1 and/or EC2 should create a new strategic leisure, cultural and visitor destination, providing a range of cultural, artistic and creative facilities.

8•7 The aim is to continue Earl's Court's reputation as a cultural destination. The new cultural destination must create an attractive place, with a distinctive cultural identity. Examples of cultural facilities that create successful destinations include: The Kunstmuseum (Stuttgart), Sadler's Wells (Islington), The Lowry Centre (Salford), The Public (West Bromwich), Millennium Square (Bristol) and the Saatchi Gallery in Duke of York's Square (King's Road).

8•8 In addition to the cultural uses, the design of buildings and spaces should contribute to this cultural identity. Buildings must be of exceptional architectural quality to mark the location of this important destination. Locating the cultural destination in the vicinity of the Empress State building could also give meaning to the height and presence on the skyline of this existing landmark. This cultural destination should be further enhanced by supporting artistic and creative uses, public art and the use of external space for suitable exhibitions and events. However, the use of external space must not have a negative impact on the residential amenity of new and existing residents in the area.

8•9 This cultural destination will benefit residents and visitors, but it will also be important to existing businesses in the surrounding area who currently rely on the existing Earl's Court Exhibition Centres for a lot of their business (as set out in Key Principle ES6 of the Employment Strategy). The cultural destination will therefore need to be delivered in the earliest phases. Shops and services may serve and complement the cultural destination, while providing street level interest. The nature of this retail provision, together with measures to ensure it complements the cultural destination, will be controlled through the Retail Management Plan, as set out in Key Principle RS5.

8•10 A written strategy will be required for all planning applications involving the demolition of EC1 and/or EC2, demonstrating how that application proposes to develop the OA into a viable cultural and creative destination. This strategy will need to include details of the location, size, management and capacity of the proposed facilities, together with an assessment of their likely impact on residents and businesses in the wider area. This strategy will also need to include details on the disposition of supporting land uses, including affordable artists' studios, other creative workshop and studio space and details on how the retail strategy will support the cultural destination. Where proposed, planning conditions will be used to require more detailed cultural strategies that will, among other things, include details on the user/occupier of proposed cultural facilities. The Mayor of London and the boroughs must be engaged during the preparation of the cultural strategies.

**Key Principle CS2:**
Redevelopment of the OA will need to provide at least one large cultural facility to form an anchor, together with a number of other such facilities, to form a cultural destination.

8•11 An analysis of various cultural venues throughout Great Britain is shown in Table 8.1. With this in mind, the authorities will expect that, to be considered 'large', cultural facilities should have:
- a minimum footprint of 2,500sqm (GEA);
- a minimum floorspace of 10,000sqm (GIA);
- a hosting capacity of at least 2,000 visitors; and
- attract approximately 750,000 visitors per year.

8•12 The extent to which one or several attractions anchor the cultural destination will not only depend on the size of the venue(s), but also the offer, location and how the attraction(s) are supported by smaller cultural venues, artists' studios, other creative workshop and studio space and bars/restaurants. Table 8.1 lists examples of smaller cultural facilities, showing that they can occupy relatively
A New Cultural Destination

small spaces, which is likely to meet a demand for cultural space from local organisations. The extent to which the arts and cultural offer create a destination must therefore be considered in the cultural strategy, as required above.

8.13 RBKC Core Strategy Policy CA7d indicates that a cultural facility must be located near to public transport accessibility. As Earl's Court Underground Station is the busiest station in the OA, at least one cultural facility must be located in the same general location. The type, size and offer must be such to sustain a culture facility in this location for the longer term. In this location it will help to create a sense of arrival to the OA from Earl's Court Underground Station. It will also ensure cultural facilities are provided early in the site’s development, aiding those existing business that depend on the current footfall from the exhibition centres.

8.14 In addition to delivering a cultural destination, financial contributions will also be sought for enhancements to nearby heritage attractions, such as Brompton Cemetery.

Key Principle CS3:
Redevelopment of the OA will need to provide affordable artists’ studios and other creative workshop and studio space.

In addition to the cultural facilities, redevelopment of the OA will need to provide affordable artists' studios and other creative workshop and studio space. The Mayor of London’s Cultural Strategy (2012 and beyond) states that ‘an important means by which arts and culture have contributed to urban regeneration is through workspace and artist studios’. This strategy makes specific reference to the large and constant demand for artists’ studio space in London, quoting one specific provider, ACME, who have a waiting list of more than 3,500 artists. The strategy required under Key Principle CS1 will need to include information on the design, location, size, management and number of artists’ studios and other creative workshop and studio space and its affordability.

Key Principle CS4:
Redevelopment should create opportunities to use art and culture to engage the new and existing communities at various stages and phases throughout the redevelopment.

8.16 Culture and art can play an important role in integrating the existing and new communities, whilst also keeping the existing community engaged through the development process. This can happen at various stages during the construction process, such as engagement events with the existing community (explaining aspects of the development process); using art or relevant information to improve the look of the hoardings during demolition and construction; and events where the new and existing community have an opportunity to interact. Applicants should also explore opportunities for vacant buildings to be used to accommodate pop up exhibitions and cultural events; although in some instances planning permission and event licences may be required. The authorities will expect that the strategy required under Key Principle CS1 sets out approaches to delivering this principle, where measures would be secured through planning condition or planning agreement.
# A New Cultural Destination

<table>
<thead>
<tr>
<th>Name</th>
<th>Facilities</th>
<th>Footprint (GEA)</th>
<th>Internal floorspace/capacity</th>
<th>Distance from Public Transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>Earl’s Court Exhibition Centre (existing use) - London</td>
<td>Exhibition and assembly space</td>
<td>53,000m²</td>
<td>97,000m² of exhibition space and meeting rooms for up to 900 visitors. Attracts about 3 million visitors / yr.</td>
<td>50m (Earl’s Court Underground Station)</td>
</tr>
<tr>
<td>The Lowry Centre – Salford, Manchester</td>
<td>2 theatres, studio space, gallery, conference spaces, bars and restaurants</td>
<td>9,000m²</td>
<td>1600m² of gallery space, 2700m² of conference and meeting space, theatres seating 1,730 and 466 respectively and studio for 180 seats</td>
<td>450m (Harbour City Tram Station)</td>
</tr>
<tr>
<td>Commonwealth Institute - London</td>
<td>Exhibition and assembly space</td>
<td>4,500m²</td>
<td>10,000m² total. Aiming to attract 500,000 people per year.</td>
<td>500m (High Street Kensington Underground Station)</td>
</tr>
<tr>
<td>The Public – West Bromwich, Birmingham</td>
<td>Gallery, flexible theatre and conference space, workshops and offices</td>
<td>2,500m²</td>
<td>9000m² total. Theatre for 249 seats (400 standing), meeting and conference space for an additional 350 visitors</td>
<td>460m (West Bromwich Central Tram Station)</td>
</tr>
<tr>
<td>Grand Canal Theatre - Dublin</td>
<td>Theatre, conference facilities. The theatre is integrated into a commercial development</td>
<td>2,400m²</td>
<td>2000 capacity auditorium, adjoining 45,000m² of office and retail floorspace</td>
<td>500m (Grand Central Dock Railway Station)</td>
</tr>
<tr>
<td>Saatchi Gallery – Chelsea, London</td>
<td>Gallery</td>
<td>2,000m²</td>
<td>6,224m² of flexible gallery, exhibition and meeting space. Attracts about 1 million visitors / yr.</td>
<td>380m (Sloane Square Underground Station)</td>
</tr>
<tr>
<td>Institute of Contemporary Arts - London</td>
<td>Gallery, 2 screen cinema, theatre/music venue, bar/café and meeting/conference space</td>
<td>1,900m²</td>
<td>2 screen cinema for up to 230 visitors, theatre/music venue for up to 300 standing, 300m² of meeting/conference space</td>
<td>200m (Charing Cross Underground Station)</td>
</tr>
<tr>
<td>Sadlers Wells – Islington, London</td>
<td>2 auditoriums, 4 meeting/conference spaces, rehearsal studio and a small scale bar/cafe</td>
<td>1,650m²</td>
<td>Flexible main auditorium with a capacity of 1,560 all seated with reconfigurations for between 1,000 and 1,800 attendees, smaller auditorium has a capacity of 200 seats. Space for conferences, meetings or lectures for up to 550 visitors (depending on layout)</td>
<td>540m (Angel Underground Station)</td>
</tr>
<tr>
<td>Nottingham Contemporary - Nottingham</td>
<td>Four galleries, a performance and film space, meeting rooms, a learning room, Café/Bar</td>
<td>1,500m²</td>
<td>3,000m² of exhibition space</td>
<td>375m (Nottingham Railway Station)</td>
</tr>
</tbody>
</table>

Table 8.1: Cultural venue case studies
**Public Art**

**Key Principle CS5:**
High quality public art will be required to enliven public spaces, create distinctive places and contribute to the identity of the cultural destination.

8•17 Public art can help to create a sense of place and identity by adding to the character of the townscape. This is particularly important when considering the type of place or identity being created in the cultural destination. However, public art must always be of the highest quality, and be carefully located so it does not restrict pedestrian movement or add to street clutter. The local community should be engaged in the design and location of new public art installations.

8•18 Policy 7.5B of the Mayor’s London Plan (2011) states that ‘Opportunities for the integration of high quality public art should be considered’. Guidance on public art is also provided in the Mayor’s Cultural Strategy (2012 and beyond). RBKC’s Core Strategy (Policy CR4) ‘requires all major development to provide new public art that is of high quality and either incorporated into the external design of new buildings or within the public realm’. Public Art in RBKC would also need to have regard to RBKC’s Public Art Supplementary Planning Guidance, 2004.

8•19 The civic spaces required under Key Principle UF10, will need to demonstrate how public art is integrated into design of the public realm for the entire OA.

**Hotels**

**Key Principle CS6:**
Any application for the comprehensive redevelopment of the OA will be expected to include an element of hotel provision. At least 10% of the bedrooms in any hotel development should be wheelchair accessible.

8•20 There is a high concentration of hotels within the vicinity of the OA and the one hotel that is located within the OA (295 North End Road). The concentration of hotels is mainly due to the number of visitors attracted by Earl’s Court’s accessible location and the Exhibition Centres.

8•21 Annex 1 of the Mayor’s London Plan (2011) requires development in the OA to explore the provision of, amongst other things, hotels. Policy 4.5A of the Mayor’s London Plan (2011) ‘seeks to achieve 40,000 net additional hotel bedrooms by 2031, of which at least 10% should be wheelchair accessible’. Policy 4.5B of the Mayor’s London Plan requires development to contribute towards meeting the requirements in Policy 4.5A. RBKC’s Core Strategy (2010) Policy CA7e and CF8b identifies the Earl’s Court Exhibition Centre Strategic Site as being an appropriate location for new hotels. LBHF’s Core Strategy (2011) ‘Strategic Site and Housing Regeneration Area - FRA 1’ identifies hotels as an appropriate use as part of any comprehensive regeneration of the OA.

8•22 There are different hotel markets to be served, including the leisure market, where a spa and pool would be required, the business market, which would need conference facilities and a business centre, and the budget market. Comprehensive redevelopment of the OA is of a sufficient scale to meet the demand from different hotel markets.
Overview

This chapter sets out the requirements for the type, quantum and broad locations for the provision of social and community facilities necessary to support the comprehensive redevelopment of the OA, in relation to the provision of:

- Education facilities (nursery, primary and secondary);
- Health facilities;
- Sports and leisure facilities;
- Police facilities; and
- Community and library facilities.

Please note, that there are other facilities often regarded as social and community uses, such as pubs, chemists and post offices. All these uses are shop uses, falling within the ‘A’ use classes, and are therefore dealt with as part of the Retail Strategy, see Chapter 7.

Policy Context

9.3 The Mayor’s London Plan (2011):
- ‘The 2012 Games and their Legacy’ (Policy 2.4);
- ‘Protection and Enhancement of Social Infrastructure’ (Policy 3.16);
- ‘Health and Social Care Facilities’ (Policy 3.17);
- ‘Education Facilities’ (Policy 3.18); and

9.4 LBHF’s Core Strategy (2011):
- ‘Strategic Site and Housing Regeneration Area – FRA 1’; and
- ‘Supporting Community Facilities and Services’ (Policy CF1).

9.5 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision);
- ‘Earl’s Court Exhibition Centre’ Strategic Site’ (Policy CA7);
- ‘Infrastructure Delivery and Planning Obligations’ (Policy C1); and
- ‘Social and Community Facilities’ (Policy CK1).
Education

**Key Principle SC1:** Any planning applications within the OA will be assessed against both RBKC and LBHF child yield formulas below in order to provide the relevant educational (nursery, primary and secondary) floorspace and associated fit out costs to cater for the population uplift in the area.

**9.6** Educational provision in the vicinity of the OA is currently at capacity. Comprehensive redevelopment of the OA would lead to a large increase in population. Some of this population would be of school age and any development would need to cater for their educational needs.

**9.7** Child yield formulas are used to estimate the possible educational needs resulting from any development. RBKC set out their child yield formula in their Planning Obligations SPD (2010), shown in Table 9.1. In LBHF, the 2004 Wandsworth Housing Survey has been used as the basis for child yield calculations (see Table 9.2). The model has been adapted to reflect LBHF’s criteria for the allocation of intermediate housing, which gives priority to couples and single parents with children when allocating accommodation with two or more beds. The methodologies of the boroughs’ child yield formulas are consistent with and reflect GLA guidance and advice.

**9.8** Any planning application submitted for the redevelopment of the site would have to be assessed against these child yield formulas in order to ascertain the anticipated increase in nursery, primary and secondary school numbers.

**9.9** The authorities will secure the provision of floorspace to cater for the needs arising from any development, as well as financial contributions towards the fit out of any educational provision. Developers should have regard to Building Bulletin 99 when calculating the quantum of floorspace necessary for a new primary school and Building Bulletin 98 when calculating the quantum of floorspace necessary for a new secondary school. Any primary and secondary school should be located together and should be positioned in an easily accessible location for all new residents living in the OA. The exact location should also be predicated on discussions with both boroughs’ education departments, and should be provided within the early phases of development.

<table>
<thead>
<tr>
<th>Bedrooms</th>
<th>Market/Intermediate</th>
<th>Social Rented</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0.01</td>
<td>0.09</td>
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<tr>
<td>2</td>
<td>0.03</td>
<td>0.90</td>
</tr>
<tr>
<td>3</td>
<td>0.20</td>
<td>1.80</td>
</tr>
<tr>
<td>4+</td>
<td>0.31</td>
<td>3</td>
</tr>
</tbody>
</table>

Table 9.1: RBKC child yield formulas

<table>
<thead>
<tr>
<th>Bedrooms</th>
<th>Market</th>
<th>Intermediate</th>
<th>Social Rented</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0.01</td>
<td>0.01</td>
<td>0.07</td>
</tr>
<tr>
<td>2</td>
<td>0.11</td>
<td>0.255</td>
<td>0.40</td>
</tr>
<tr>
<td>3</td>
<td>0.42</td>
<td>1.135</td>
<td>1.85</td>
</tr>
<tr>
<td>4+</td>
<td>0.98</td>
<td>1.44</td>
<td>1.90</td>
</tr>
</tbody>
</table>

Table 9.2: LBHF child yield formulas
Health

Key Principle SC2:
Any planning application for comprehensive redevelopment of the OA will need to provide a NHS health facility. The size of this facility should be calculated based on the methodology set out in this SPD. The facility should be located in an easily accessible location for all residents living within the OA and should be provided within one of the earlier phases of development.

9.10 Within both boroughs, the primary healthcare provision is currently at full capacity and the increase in population within the OA will give rise to demand for an additional NHS health facility. This should be provided in the form of a single facility within the OA, at an early phase in the development and in a location that would be easily accessible for residents living in both boroughs. If the optimum location for this facility is in one of the later phases, the facility could be moved at that stage, with the original premises being converted to an alternative use. The calculation for the size of this facility is based on the following methodology:

- If the population is under 10,800, applicants will be required to provide a Health Centre. The size of the facility will be calculated based on a need for 225sqm per GP and one GP for every 1,800 residents.
- Wandsworth’s 2004 New Housing Survey should be used as the basis for calculating population yield.

9.11 The primary healthcare centre must be fully accessible with a viable street presence and meet the current requirements for the Equality Act 2010. Reference to current NHS guidance for planning new Primary and Social Care Premises is set out in the Department of Health’s (DH) Design Guidance including “Facilities for Primary and Community Care Services: Planning and Design manual 1183:0.6 England” published 2011 and “Health Building note (HBN) 00-10 Performance requirements for building elements used in healthcare facilities 8941:0.6 England” published April 2011. If an integrated Primary Care Centre is required it would need to include dental services, space to support the specialist skills that GPs are developing in response to local health and wellbeing needs, outreach facilities and home-based medical support.

Key Principle SC3:
Any major planning applications in the OA must be accompanied by a Health Impact Assessment.

9.12 An analysis of the health impacts of the proposed developments will need to factor-in the following sectors:
- Acute healthcare;
- Mental healthcare;
- Intermediate healthcare;
- Primary healthcare.

9.13 The Health Impact Assessment would need to consider impacts on minority groups, future trends, emerging Government policy and health reforms and advances in technology and social change which may have an impact on future healthcare delivery, such as demographic shifts to an increasing elderly population. The Health Impact Assessment would need to assess impacts of demolition and construction on the new and existing population.
Sports and Leisure

**Key Principle SC4:**
Any proposals for redevelopment of the OA must provide a range of indoor and outdoor sports and leisure facilities to cater for the needs of the future population. These facilities will need to cater for a variety of incomes. A proportion of affordable sports and leisure provision will be secured as part of any planning agreement. The facilities provided should target existing deficiencies in indoor and outdoor sports provision, particularly multi-use outdoor pitches and indoor multi-use sports courts.

9.14 Policy 3.20 of the Mayor’s London Plan (2011) promotes applications that improve access to sports and leisure provision. Policy CF1 of LBHF’s Core Strategy (2011) states that the OA is considered appropriate for major new leisure and recreation facilities. RBKC’s Core Strategy (2010) also recognises the importance of access to sports and leisure, stating in para 29.2.4 that planning obligations will be negotiated to ensure access to such facilities.

9.15 Any application will be expected to provide a range of sports and leisure facilities to cater for the needs of the future population. These facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. The authorities will secure a proportion of affordable sports provision. This should take the form of discounted membership fees and discounted non-membership access fees.

9.16 Sport England data (Local Sports Profiles Toolkit 2011 et. al.), together with local data, shows there to be existing deficiencies in both indoor and outdoor sports provision, particularly multi-use outdoor pitches and indoor multi-use sports courts. Any applicant would need to consult the borough leisure departments and target these particular deficiencies in their sport and leisure offer.

**Key Principle SC5:**
Any application for comprehensive redevelopment of the OA must provide sports facilities that allow at least one sport to be developed to an “elite” standard, in order to retain the legacy of the London 2012 Olympics.

9.17 The Mayor’s London Plan (2011) recognises the importance of the 2012 Olympic Games to London. Policy 2.4Ch states that “the Mayor will, and boroughs should take opportunities presented by the 2012 Olympic and Paralympic Games and their legacy to increase participation in sport and physical activity”. The importance of developing sports infrastructure is recognised in the Mayor’s Sports Legacy Plan, ‘A Sporting Future for London’.

9.18 The Earl’s Court Exhibition Centres are to be used during the 2012 Olympics for volleyball. In order to retain the sporting legacy of the site, any application for comprehensive redevelopment should ensure that the sports and leisure provision allows for at least one sport to be developed to an “elite” standard (i.e. it meets regional performance targets for one sport’s governing body).
Police Facilities

Key Principle SC6:
The authorities will secure, through any planning agreement(s):
• A community policing facility and financial contributions towards staffing the facility;
• Closed Circuit Television (CCTV) within the OA; and
• Financial contributions towards the expansion the boroughs’ CCTV control centres.

9.19 Both Councils’ policing facilities are currently at capacity. Any development in the OA will need to contribute towards increasing the policing capacity needed to cater for the new population.

9.20 The authorities will require development to deliver a police shop, located within a retail frontage. It should operate a small base from which the police can launch patrols and at which the new community would be able to have day to day contact with the police service. Financial contributions will be sought towards the staffing of this facility.

9.21 CCTV will need to be provided by the developer and linked into the borough’s CCTV network. Alternatively, a financial contribution will be sought for the boroughs to implement the CCTV. A contribution will also be required to increase staffing of the boroughs’ CCTV control centres to cater for the increased demand from the expanded CCTV network.
Community Space

**Key Principle SC7:**
Redevelopment of the OA must provide a community hub of 4,500m² GIA. This new community hub should have a library on the ground and possibly first floors, with the remainder of the building providing multi-faith space, youth space, children's centre, affordable and flexible office, training and meeting space, adult learning and training space and halls for hire for use by the voluntary sector and residents. Provision must be made available for new community space before any existing community space is demolished.

9.22 The OA is currently adequately served in terms of community space. The Gibbs Green and West Kensington estates each have their own community hall and there are a number of other community halls in the vicinity of the OA. There are two libraries in close proximity to the OA – Baron’s Court Library in LBHF and Brompton Library in RBKC. Baron’s Court Library has reduced opening hours and Brompton Library has limited capacity to accommodate any additional users and is not an ideal location for a library, given the population increase proposed in the OA.

9.23 Redevelopment of the OA will need to reprovide any lost community floorspace as well as provide additional space to cater for the new population living within the OA. The boroughs have assessed the likely floorspace requirements that the new population will generate and will expect any proposals for comprehensive redevelopment to provide a community hub, with up to 4,500sqm Gross Internal Area, which combines community facilities. New development will need to ensure that the new community hub is available for hire before either of the existing community spaces are demolished or that temporary spaces of at least equivalent floorspace are provided.

9.24 This new building must be provided within the early phases of development and must be easily accessible to the new community and residents of both boroughs, fronting onto a street with high footfall and designed as a new modern civic building, with a strong visual presence. The building must have active ground floor uses and should look to provide a variety of different community spaces, such as a library, multi-faith space, youth space, children’s centre, adult learning and training space, a community café, flexible office and community space and halls for hire. The authorities will require that the spaces provided are affordable and accessible to all and provide for diverse cultural needs.

9.25 This community hub should not only provide a valuable resource for the local community and community groups, but should help new residents of the OA integrate into the existing social fabric. This could be achieved by providing community support, local information and information for new and existing residents on the progress of redevelopment in the OA.
10 TRANSPORT AND ACCESSIBILITY STRATEGY
Overview

Key Objectives

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

10•1 This chapter sets out what improvements to the transport network will be necessary to support development. These include improvements to the public realm to encourage walking, improved cycle facilities and increased capacity on the public transport and road networks. This chapter is informed by a Strategic Transport Study, a review of which can be found on the authorities’ websites.

10•2 The OA is a transport dominated site with a mix of transport infrastructure adjoining or running through and under it. The local transport facilities play an important role in connecting Earl’s Court to the rest of London and the UK as a whole but these connections also create significant local severance across the area particularly for pedestrians and cyclists, which impacts on local quality of life and accessibility to goods, services and employment.

10•3 As is the case in most of London there is an extensive pedestrian footway network along existing local streets and roads. However there are some areas where the quality of this network needs improving. This, along with the severance caused by the rail lines and Exhibition Centres, creates a barrier to north-south and particularly east-west pedestrian and cycle movement through the OA. This isolates the OA, reduces the attractiveness of walking and cycling and restricts access to local public transport.

10•4 The OA is served by three London Underground stations; Earls Court, West Brompton and West Kensington. These stations provide access to the District and Piccadilly Lines. West Brompton is also served by the Overground network and is a strategic interchange as designated by the Mayor’s Transport Strategy providing a key interchange between orbital and radial rail services. The edges of the OA are thus well served with a high Public Transport Accessibility Level, but the centre has a low score of 2, on a scale of 0 (little or no access) to 6b (most excellent access).

10•5 The London Underground lines serving the OA are some of the most congested in London, with crowding levels in excess of four people per square metre in some sections of both the District and Piccadilly Lines in the AM peak period. Significant increases in capacity are planned and funded for the District and Piccadilly Lines as part of the London Underground upgrades. The District Line upgrade is planned to be complete by 2018 and will increase capacity by 24%. There is no definite date for the upgrade of the Piccadilly Line, which would provide a capacity increase of 24%, although it is expected to be complete prior to 2031. Crossrail is planned to open in 2018, which will release capacity on the Central Line, which in turn will draw passengers from the Piccadilly Line, thereby releasing some limited capacity.

10•6 All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound Southern trains services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancements.
Context

In addition, crowding will increase to over three people per square metre on all southbound services to West Brompton.

10.7 Significant parts of the highway network are currently operating at capacity with a number of traffic delays at junctions in and around the OA, including at all four corners of the site, during both peak periods as well as the weekend. These are illustrated in Figures 10.4 and 10.5 overleaf.

10.8 The A4 and the Earl’s Court One Way System have a key role in the maintaining the performance of the strategic highway network. This also impacts on the ease and attractiveness of pedestrian and cyclist movement, residential amenity, access to bus services and the townscape of the areas through which they run, including the OA.

10.9 The OA currently includes 2,500 car parking spaces. On-street in RBKC there is a mixture of residents’ and pay and display parking with limited spare capacity. In LBHF the available parking for visitors is greater because dual use parking bays are provided.

Policy Context

10.10 The Mayor’s London Plan (2011):
• ‘Strategic Approach’ (Policy 6.1).

10.11 LBHF’s Core Strategy (2011):
• ‘Strategic Site and Housing Regeneration Area – FRA 1’; and
• ‘Transport’ (Policy T1).

10.12 RBKC’s Core Strategy (2010):
• ‘Earl’s Court Exhibition Centre’ (Policy CA7);
• ‘Earl’s Court’ (Policy CP10 and associated Vision);
• ‘Improving Alternatives to Car Use’ (Policy CT1); and
• ‘New and Enhanced Rail Infrastructure’ (Policy CT2).

Figure 10.1 Existing public transport availability levels (2011)
Context

Figure 10.2 Crowding on the London Underground network 2007(left), 2031(right)

Figure 10.3 Crowding on the London Overground and National Rail Network, 2007(left), 2031(right)

Figure 10.4 Traffic delay in the AM peak hour (2008 - 2009)

Figure 10.5 Traffic delay in the PM peak hour (2008 - 2009)
Transport Capacity

Key Principle TRN1:
Any development proposals should demonstrate by way of robust Transport Assessments that the cumulative impact of development on the transport networks is acceptable.

10•13 This chapter sets out the transport impacts of, and interventions and further work required to support a development scenario that includes 5,560 homes and 12,165 jobs.

10•14 Two higher transport scenarios were considered in the first draft of the SPD:
• 8,286 homes and 24,050 jobs; and
• 10,647 homes and 31,895 jobs.

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

Key Principle TRN2:
Development should be supported by robust Transport Assessments that set out phase by phase what the cumulative impact of development will be and how it will be mitigated at each phase.

10•15 Any applications for development in the OA should demonstrate, by way of robust Transport Assessments, that phase by phase the impacts of development are properly mitigated and can be accommodated on the transport networks. Appropriate controls will need to be agreed to ensure development is not implemented until capacity improvements and other mitigations are provided.

Walking and Cycling

Walking

Key Principle TRN3:
All streets within the OA should be designed and built to adoptable standards and offered to the Highway Authority for adoption.

10•16 Development should provide a coherent network of streets that opens the OA up to pedestrians and cyclists, is accessible to all with appropriate gradients where changes in level are experienced, generous footway widths and accessible crossing facilities. The streets should provide safe and direct north-south and east-west movement for pedestrians and cyclists and integrate well with the surrounding streets.

Key Principle TRN4:
All streets within the OA should be accessible to all with appropriate gradients where changes in level are experienced, generous footway widths and accessible crossing facilities. The streets should provide safe and direct north-south and east-west movement for pedestrians and cyclists and integrate well with the surrounding streets.
Walking and Cycling

10•17 All new streets created within the OA should be built to adoptable standards and will be offered for adoption to the Local Highway Authorities. Adopting the streets would ensure that design, construction and future maintenance will be of the highest standards and it will secure public access in perpetuity.

10•18 A route for pedestrians and cyclists above the alignment of the West London Line could create an alternative route to Warwick Road, where footfall is already high. Improvements to connections to the north and south of the site at either end of the route should be investigated in order to create links with existing and planned pedestrian and cycle routes in the area. Opportunities for public open space in this location are considered in more detail in the Urban Form Strategy (Chapter 4).

Key Principle TRN5: Development should provide a coherent pedestrian wayfinding strategy in and around the OA.

10•19 A coherent wayfinding strategy will be required to encourage walking and cycling within and around the OA. This strategy will need to reflect Transport for London’s Legible London standards and utilise all opportunities of providing navigational information to pedestrians, such as bus stops and the Mayor’s Cycle Hire Scheme docking stations.

Key Principle TRN6: New development should fund environmental improvements and deliver wider, clearer and higher quality footways on the existing streets surrounding the OA and contribute towards the A4 improvement scheme.

10•20 Development will add significantly to footfall in the area, as shown in Figure 10.6. This shows total pedestrian trips, including existing and forecast additional pedestrian movements within and adjacent to the OA. The distribution of pedestrian trips is based on existing movements in the area and identifies the proportion of new trips likely to be made to each of the stations.
Walking and Cycling

10.21 There is generally sufficient footway width to accommodate the footfall generated by development on the existing streets. However, the clear footway width (i.e. the footway space available for pedestrians once street furniture has been taken into account) will be insufficient in some locations, either because of narrow footways or excessive and poorly coordinated street furniture. In particular, clear footway widths will need to be increased on North End Road around West Kensington station, around the Earl's Court station entrance on Warwick Road and around West Brompton station on Old Brompton Road (see Figure 10.7). Rationalisation and removal of street furniture will help increase clear footway width in these locations.

10.22 The detailed design of the internal network of pedestrian routes within the OA should be attractive and convenient for pedestrians as these will need to be designed to relieve the existing footways as far as possible.
Walking and Cycling

10.23 The streets surrounding the OA, including North End Road, Warwick Road, Lillie Road, Old Brompton Road, the A4 and Earl’s Court Road all require improvements if they are to accommodate higher levels of pedestrian footfall. The development should therefore deliver significant environmental improvements to these streets including repaving and more consistent dropped kerbs. Given the additional footfall added to the A4 by development, contributions will be required towards the A4 improvement scheme, which is being developed by TfL and the boroughs. The treatment of the spaces around the stations will also need to be improved to provide more coherent interchange between transport modes as well as better pedestrian environments.

10.24 Environmental improvements to the Warwick Road entrance at Earl’s Court station will also be essential and should include removal of the existing hoardings. The improvements will need to form part of a coherent urban design response that includes links into a new civic space and accommodates the necessary interchange improvements.

Key Principle TRN7:
New development should deliver new pedestrian crossings and improve existing crossings in order to meet the increased demand from development and significantly improve the pedestrian environment and access into and out of the OA.

10.25 The level of pedestrian footfall set out in Figure 10.6 will also have an impact on pedestrian crossings in the area. The crossing on Old Brompton Road has insufficient width to accommodate the predicted development footfall and will need to be widened. To help relieve the crossing at Warwick Road and reduce congestion within Earl’s Court station, new development should refurbish and reopen to the public the existing pedestrian tunnel beneath Warwick Road to allow direct access to the Underground station. A new pedestrian crossing will be necessary on the A4 and should be incorporated into a new junction into the site. The existing crossings on the A4 at North End Road and Warwick Road would be improved by the introduction of straight ahead crossings instead of the staggered arrangements that currently exist. However, such changes, including a crossing at the new A4 junction, are likely to have an impact on traffic capacity and will need to be carefully reviewed to ensure an appropriate balance of users’ needs is achieved.
Walking and Cycling

**Streetscape on Earl’s Court Road (ECR):**
ECR benefits from active frontage for the majority of its length and footways are of sufficient width to provide a good level of service for pedestrians. However, the space is compromised by high levels of street furniture and high traffic volumes.

**Streetscape along the A4 to the north of Earl’s Court:**
The public realm along the A4 is very poor and does not encourage use by any modes other than vehicular. The important role in traffic terms means scope to reallocate carriageway space is limited.

**Junction of Lillie Road and North End Road:**
Little benefit provided in a public realm sense and it does not cater well for other users despite the provision of zebra crossings on all arms. Railings and pedestrian guard rail means movement is limited, significant alterations are also constrained by 3rd party land holdings.

**Crossing facilities, footways and open space of the Warwick Road access to Earl’s Court LUL Station:**
This space has the potential to deliver a high quality public space and gateway into the OA from Earl’s Court LUL Station.

**Difficult balance between all users and dominance of vehicles means safety must be a priority. Location also experiences high numbers of pedestrian movements.**

**Public space and streetscape outside of West Brompton Station:**
It is considered that this space could be improved to deliver improved integration between the OA and station. This area currently experiences medium levels of pedestrian movement which will increase through the delivery of any future masterplan.

The space in this location currently lacks frontage and is characterised by large advertising boards on both sides of the carriageway. The existing footways are narrow and constrained further by pedestrian guard rail, particularly on the northern footway.

Figure 10.10 Streets surrounding the OA with poor public realm that would need to be resolved (2011)
Walking and Cycling

Cycling

10•26 If the development proposals are to have an acceptable impact on the surrounding road and public transport networks, cycling should form a key part of the travel choices made by those working and living in the site. Significant investment in cycling facilities, supported by strong Travel Plans, will be vital to achieving higher levels of cycling and are expected to be funded by the development.

10•27 The development is forecast to generate around 600 cycle trips in the peak hours. The creation of a new network of cycle friendly streets within the OA will mean that cycling will be safer and more attractive for all. It should be noted that as the local cycling environment is enhanced, cycling will become ever more attractive and therefore these forecasts should be regarded as the minimum that could be expected.

Key Principle TRN8:
New development should deliver improved onward connections for cyclists into the streets surrounding the OA.

10•28 One of the most significant improvements required to accommodate cycle trips is better east-west connectivity. All new streets within the OA should be attractive to cyclists and offer maximum permeability with excellent onward connections into existing streets. If road closures or one-way streets are proposed within the site these should allow for the passage of cyclists in both directions. Safe and convenient connections north, under the A4 to Warwick Road and south, under Lillie Road, will also need to be investigated. To the east of the site in particular there are several one-way streets that are designed to discourage vehicles from rat running but that also cause significant inconvenience, making cycling less attractive. In order to accommodate the increased demand from development any new development should identify cycle routes based on the likely origin and destination of trips through the area and fund appropriate improvements, such as allowing cycling in both directions in one-way streets and improvements to junctions and crossings, to make those routes as attractive and convenient as possible.

10•29 All new streets should be designed to ensure 20mph maximum speeds, which will improve their attractiveness for cyclists and pedestrians by making them safer and reducing traffic noise. More detail on this is set out in the Urban Form Strategy.

Key Principle TRN9:
New development should deliver increased levels of cycle parking to London Plan and Local Development Plan standards, particularly at key public transport interchanges, and the Mayor’s Cycle Hire Scheme should be extended into the OA.

10•30 Secure and convenient cycle parking should be provided for residents and workers and sufficient showering and changing facilities should be provided in commercial buildings. Visitor cycle parking on the new streets should be plentiful and located close to areas of demand, such as major entrances to buildings, that benefit from natural surveillance. There is already insufficient cycle parking within the existing streets and at the three Underground stations to meet demand and development will increase this demand. Development should address this problem through additional parking within the OA boundary as well as through a thorough review of opportunities, and funding of new facilities, to increase existing parking levels in the area.

10•31 The Mayor’s Cycle Hire Scheme already extends to the eastern edge of the OA and Phase Three of the Mayor’s Cycle Hire Scheme will extend it west, beyond the OA. Docking stations should be provided within the OA with several new docking stations required to meet the likely demand. The cost will be borne by the development.
Public Transport

Rail services

Key Principle TRN10:
New development should deliver physical improvements to all three stations to accommodate the forecast increase in passenger numbers.

Key Principle TRN11:
Development in the OA should not result in excessive crowding or delay on the London Underground or National Rail and Overground networks, compared to predicted levels in 2031.

10.32 Development will add a significant number of additional trips to the rail networks. The figures below represent all development related trips starting or finishing in the OA by public transport, including buses, although the majority will be made by rail.

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<tr>
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<th>IN</th>
<th>OUT</th>
<th>2-way</th>
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<tbody>
<tr>
<td>AM Development</td>
<td>1,500</td>
<td>1,300</td>
<td>2,800</td>
</tr>
<tr>
<td>PM Development</td>
<td>1,200</td>
<td>1,400</td>
<td>2,600</td>
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</tbody>
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Table 10.1: Peak hour net additional public transport trips to and from the OA

10.33 The capacity increases set out in paragraph 10.05 are such that this level of additional loading can be accommodated on the individual lines serving the site. However, due to significant growth in population and employment as well as the demands of development, crowding levels in and around the OA in 2031 are forecast to be at a similar level to today. Crowding on the Wimbledon branch of the District Line is likely to be even higher than it is today and this line will remain the most overcrowded in West London.

10.34 There are a number of currently unfunded proposals that would, if delivered, provide transport benefits to the OA. In particular this includes the provision of longer trains on the London Overground and Southern Services along the West London Line and the proposed Chelsea Hackney Line, which would offer relief to the Wimbledon branch of the District Line. For robustness the Strategic Transport Strategy did not include any additional capacity from these proposals although the principle of each is supported due to the benefit that they would provide to the area.

10.35 A static assessment of the impact of development on all three local stations in 2031 has identified that each would require a significant level of investment to be able to operate at a satisfactory level. All three stations would require an increase in gate line capacity, whilst both West Kensington and particularly West Brompton would require enlarged ticket halls, enhanced stairways and lift access. Detailed requirements for station improvements are set out below. All of these improvements would need to be funded by development and are subject to London Underground operational agreement.

Earl’s Court Station

Key Principle TRN12:
New development should provide capacity and environmental improvements to Earl’s Court Station, including the reopening of the existing pedestrian tunnel beneath Warwick Road, as part of ensuring the station can accommodate the forecast increase in passenger numbers.

10.36 By 2031 passenger movements into and out of Earl’s Court station in the AM and PM peaks will be at least 20% higher than existing movements (2009 figures). Development would add an additional 10% in both peaks.

10.37 The level of additional trips generated by development will put pressure on the existing Warwick Road entrance gate line, which will not be sufficient to cater for demand, and on the eastbound District Line platforms, which will experience an increase in flows along the platform to the Piccadilly Line. The refurbishment and reopening of the existing, but currently unused, pedestrian tunnel under Warwick Road would mitigate these impacts by
Public Transport

providing a direct link from the OA to the Piccadilly Line avoiding both the eastbound District Line platforms and the Warwick Road station entrance. Alternative improvements to gate line capacity would otherwise have to be identified. The tunnel would need to contain a ticket gate line and will serve as an additional entrance to the station, reducing the burden of additional trips on the current Warwick Road ticket hall and gate line to such an extent that no additional capacity enhancement would be required at the existing gate line. It would also relieve pressure on the eastbound District Line platforms and the stairwells leading down to the Piccadilly Line escalators. There is adequate concourse, platform and staircase capacity to accommodate the predicted levels of demand. Given the listed status of Earl’s Court station, changes should be undertaken sensitively and will be subject to Listed Building Consents.

West Kensington Station

10.38 At West Kensington background passenger growth for movements into and out of the station are anticipated to increase by 20-30% to the year 2031 in the AM and PM peaks. A similar scale increase is anticipated to be generated by development. West Kensington station currently has four ticket gates. The predicted background and development growth in demand to 2031 would make five gates necessary and require additional space within the concourse. In order to spread the burden of additional passengers on the existing gate line and concourse, as well as to open up the station to the centre of the OA, a new entrance to the station should be provided at its eastern end. This would remove the requirement for additional gates at the current entrance and better balance pedestrian movement within the station as well as providing a better link into the OA. All staircases and platforms are sufficiently wide to accommodate increased demand.

West Brompton Station

10.39 By 2031, without development, background passenger growth for movements into and out of West Brompton station are forecast to increase by 50% in the AM peak and 90% in the PM peak. Development will add an additional 30% in both peaks. To accommodate background growth the number of gates at the station would need to increase from the current three to six. Seven would be required to accommodate development.

10.40 There is insufficient concourse space within the current station arrangement for the volume of passengers forecast, even without development to 2031. Any new development would have to look at a comprehensive reworking of the station to provide more concourse capacity. Options for this station, as well as West Kensington, will need to be assessed to identify how additional space could be released.

10.41 All platforms can adequately accommodate the extra passenger demand forecast above. The existing staircases at the station do not meet London Underground’s minimum standards. As West Brompton station is listed any works must be undertaken sensitively and will be subject to Listed Building Consents.

10.42 West Kensington station is locally listed. The physical constraints of both West Kensington and West Brompton stations, especially considering their heritage designations, make these necessary capacity enhancements challenging and any new development should be able to demonstrate clearly how increased capacity will be achieved.

Key Principle TRN13:
New development should deliver extra capacity at the gate lines, ticket halls and circulation space at West Brompton and West Kensington stations in order to accommodate the development related trips.
Public Transport

Key Principle TRN14:
Step-free access should be provided at West Brompton and West Kensington stations and any new entrance at Earl’s Court Station.

10.43 To ensure that the OA is developed in a manner that is accessible to all as well as to cater for the significant additional passengers generated by development in the OA, it is a requirement that step-free access is provided to both platforms at West Kensington station and to the southbound District Line platform at West Brompton.

10.44 All new station entrances, such as at West Kensington, should be step-free. At Earl's Court station the reopened pedestrian tunnel should be step free at least to the District Line platforms, by providing lifts at the new entrance and extending the current District Line lifts down to the level of the tunnel.

Key Principle TRN15:
New development should fund platform lengthening to accommodate eight car trains on the West London Line platforms at West Brompton, should investigate creating an additional station entrance and fund its implementation if found feasible following the investigation.

10.45 All London Overground and Southern trains consist of four car trains. Network Rail's London and South East Rail Utilisation Strategy seeks to extend platforms on the West London Line so that they can accommodate eight car trains operated by Southern and six car London Overground trains. This would increase capacity by around 70% and would result in reduced crowding levels on the West London Line which in 2031 with development are otherwise forecast to exceed acceptable levels. Such an increase in capacity would mitigate the impact of development and reduce crowding levels. Though this scheme is currently unfunded, its delivery is a priority for TfL and Network Rail.

10.46 This improvement is particularly necessary given the very high levels of crowding experienced on the West London Line and the additional passengers that the development will introduce to the network. The increased line capacity will also increase the number of passengers accessing the station by at least 5% in both peaks. This would further impact upon the station infrastructure at West Brompton and would require at least one additional gate, bringing the total up to eight.

10.47 In addition to extending the platforms at West Brompton, creating an additional access to the station would help to reduce the pressure on the ticket hall whilst improving access to the Seagrave Road area of the OA. Development of the OA should provide platform extensions at West Brompton station and should investigate creating an additional station entrance and fund its implementation if found feasible following the investigation.

Key Principle TRN16:
New development should deliver significantly enhanced interchange facilities at all three stations.

10.48 Interchange facilities need to be improved at all three stations. Currently there are cluttered footways, limited and inconsistent way finding, poor access to bus services at West Brompton and Earl’s Court, limited cycle parking and in general a poor pedestrian environment that is dominated by vehicle movements.

10.49 The general improvements to the public realm identified as necessary in paragraphs 10.22 to 10.24 will improve the quality of the environment around all three stations. Rationalisation of street furniture will be essential and cycle parking, taxi ranks and bus stops may need to be relocated to the adjoining edges of the site as part of a complete redesign of the spaces so as to provide significantly more space for pedestrian movement without having an adverse impact on access for buses and taxis. Improved crossings and other ways of rebalancing pedestrian needs with those of vehicles will need to be investigated including, for example, the provision of single surface treatments. The design of these will need to be accessible for all and will need to incorporate improved way finding.
Public Transport

Bus Services

Key Principle TRN17:
Additional bus services, routes and stops funded by development will be necessary within and around the OA to accommodate new development trips.

10.50 Between now and 2031 local bus demand will change and bus services will need to reflect demand. Development in the OA will need to contribute to additional bus services to ensure that the additional demand generated can be supported on the bus network during peak hours. The effect of highway congestion on bus journey time reliability will need to be considered to ensure that services remain attractive to passengers.

10.51 There are a number of locations that have poor bus connectivity to Earl’s Court. These include the King’s Road, Battersea and Vauxhall, Richmond and south west London. Routes that connect the south of RBKC to the north are currently very limited and new services should help to bridge this gap. Any new routes should help to fill these and other gaps.

10.52 There are benefits of both the provision of new and the extension of existing routes to fill the gaps in the network. They will help minimise local capacity problems created by the development as they could be run through the OA, along a north-south route, which would provide a better range of services for future residents. This is especially important given the poor connections to southbound bus services caused by the splitting of routes on the Earl’s Court One Way System. Bus services should be able to travel north-south and east-west but there should be no new connection onto Warwick Road as this link is already well served and impacts on public realm. Any new links here could have significant impacts on the public realm. All changes to bus services as a result of the development will require full mitigation for five years to pay for subsidy of new or additional services until those services become revenue neutral.

10.53 Developers will be expected to carry out audits of all the bus stops and associated bus facilities in the area, as part of their Transport Assessment. Applicants will be expected to upgrade these where deficiencies exist to ensure the facilities are fully accessible.

10.54 All existing bus stands within the OA should be retained or re-provided on site, and additional space may be required depending on the detailed analysis of bus services undertaken as part of the Transport Assessment submitted in support of development.

Other Services

Key Principle TRN18:
Development should include taxi rank and coach parking facilities within the OA.

10.55 There are currently no TfL Public Carriage Office appointed Taxi Ranks within the OA or its hinterland. Taxi rank and drop off facilities, including for community transport schemes, will need to be provided to support demand from the OA.

10.56 There is significant pressure on coach parking facilities in west London. Development should not add to this pressure and therefore sufficient coach parking and drop off facilities will be required within the OA, close to high coach trip generating uses, to meet development demand.
Road network, car parking and freight

Road Network

Key Principle TRN19: Development traffic cannot be accommodated on the existing road network without significant capacity improvements, which should be clearly identified in development proposals along with appropriate funding mechanisms to ensure improvements are delivered before development demand is introduced.

10.57 Even without development in the OA, traffic levels in the local area are forecast to increase significantly from 2009 to 2031. This is due to both the recent removal of the Western Extension of the Congestion Charging Zone as well as forecast growth in population and employment. The strategic nature of the A4 means it draws significant traffic volumes through the area and is particularly affected by background increases in traffic volumes. In this chapter the ‘2031 base’ refers to forecast traffic levels in 2031 without development. The Strategic Transport Study has assessed the impact of this growth on the road network as well as the additional impacts of OA development. The full extent of the road network that was considered in the local highway modelling is shown in Figure 10.11.

10.58 The strategic transport study estimates that development would increase traffic levels within the OA by around 3% in the AM Peak and 2% in the PM peak. For the local highway network to operate at an acceptable level, this level of growth would require additional highway capacity improvements and modal shift to walking, cycling or public transport. In particular journey time reliability on the highway network should not be unacceptably impacted by development in the OA.

Figure 10.11: The extent of the road network modelled in the transport study
10.59 Development proposals should seek first to mitigate any potentially negative impacts on the highway network by reducing the level of traffic generated rather than through physical interventions to manage traffic. This is considered further in paragraph 10.72. However, in order to ensure a robust assessment was undertaken, the Strategic Transport Study also assessed a number of highway capacity interventions to establish whether they could enable OA development to take place with no reductions in travel demand assumed. The capacity interventions tested included:

- A new north-south route through the site connecting to the A4 and Lillie Road. This would provide access to, and additional road capacity through, the development as well as helping to relieve key routes such as Warwick Road, North End Road, Earls Court Road and the junctions along the A4 and Lillie Road. A link, or links, such as this are essential to allow development to take place.

- Significant changes to traffic signal phasing to give more ‘green light’ time to traffic on the roads surrounding the A4. This creates more capacity on the surrounding roads and is possible because the A4 is currently given significant priority.

- Altering the North End Road / Lillie Road junction from a double mini roundabout to a signalised junction, including banning vehicle movements from North End Road into Lillie Road and vice versa. Any street network within the OA would have to provide alternative turning movements. This is intended to reduce demand on the junction, creating more capacity for those vehicles still using it.

- Providing a new westbound left turn vehicle movement onto the A4 at the A4/ North End Road junction to run at the same time as the existing right turn eastbound vehicle movement in order to provide additional traffic capacity.

- Alterations to the signal timings at the A4 / Warwick Road junction to accommodate pedestrian crossings in each signal cycle and to remove periods where there are no green signals, which means traffic is given more time to move through the junction.

- Increasing the length of green time at the traffic signals at Old Brompton Road’s junctions with Finborough Road and Earl’s Court Road, to allow more traffic to pass through the junctions.

10.60 The impact of the capacity improvements set out above is to improve overall network performance, allowing around 15% more traffic to be accommodated. Even with the forecast growth and additional development traffic, average journey times across the local network are comparable to the 2009 base and are significantly improved in comparison to the 2031 base with no capacity improvements.

10.61 However, despite the overall road network performance benefits and the increased capacity primarily brought about by the new link road, this does create some significant variations in performance across the local network. The north-south routes generally experience improved performance and the east-west routes experience decreased performance.

10.62 North End Road, Warwick Road and Earls Court Road experience reductions in journey time and delay due to the extra road capacity provided by the north-south route and some re-phasing of traffic signal timings. Traffic on these north-south routes moves faster and more smoothly, despite overall increases in traffic flow as some demand flows through the OA. This is demonstrated in Figures 10.12 to 10.15. The figures show a pattern of increasing journey time from the 2009 base to the 2031 base and then a reduction in journey times once the interventions are added. These occur despite the addition of development traffic.
Road network, car parking and freight

Figure 10.12 Earl’s Court Road/Warwick Road AM Peak Hour Average Journey Times (measured in seconds)

Figure 10.13: North End Road AM Peak Hour Average Journey Times (measured in seconds)

Figure 10.14: Earls Court Road/Warwick Road PM Peak Hour Average Journey Times (measured in seconds)

Figure 10.15: North End Road PM Peak Hour Average Journey Times (measured in seconds)

**Key Principle TRN20:**
Development proposals should include deliverable and funded road network improvements that reduce delays on the A4 to 2012 levels, while not having unacceptable impacts on the surrounding road network.

10.63 In comparison to the impact on the north-south routes, it is clear that development, even with the highway capacity improvements tested in paragraph 10.60, would result in a deterioration of performance in terms of journey time, vehicle delay and queue lengths on the main east-west routes through the area. On the strategically important A4, journey times increase in the AM peak by around 40 seconds westbound and 60 seconds eastbound in comparison to the 2009 base. Eastbound traffic also experiences worsened journey times in comparison to the 2031 base. In the PM peak the overall increases in traffic volume are greater and the journey times therefore increase more significantly. Both directions also see a worsening in comparison to the 2031 base. These delays are due not only to the rebalancing of traffic priority at the junctions as explained above, but also to the introduction of a new junction on the A4.
On Old Brompton Road journey times in the AM peak remain broadly unchanged in comparison to the 2031 base, but are increased from the 2009 base. In the PM peak the delays are greater at around 100 seconds eastbound and 210 seconds westbound in comparison to the 2009 base. The increase from the 2031 base is more modest, though still significant, at around 90 seconds in both directions. The greater impact in the PM is due to the larger overall increase in background traffic volume between 2009 and 2031.

The information outlined above demonstrates that with the interventions tested, development can occur in the OA whilst not impacting on broader network performance, but more locally it would have negative impacts on the A4 and Old Brompton Road. Given that the A4 is a strategic trunk road and part of the Transport for London Road Network (TLRN), such an impact is not acceptable and any development proposals for the OA would need to consider alternative or additional measures to maintain the A4’s performance and minimise the impact on Old Brompton Road and would need to demonstrate that this could be achieved through a wide range of mitigation measures within their Transport Assessment. This could include measures such as physical junction improvements, further changes to traffic signal phasing, travel demand management measures and a comprehensive Travel Plan that
Road network, car parking and freight

will promote a shift in behaviour towards sustainable travel choices. These will all need to be secured and funded by the developer. A detailed assessment of the highway network will need to be undertaken as part of any Transport Assessment.

10•66 Improving the capacity of the road network to allow it to accommodate development traffic is essential and some methods of doing that have been set out above after being tested in the Strategic Transport Study. However that assessment did not consider the impact of additional traffic volumes on air quality, residential amenity or on levels of queuing on any new north-south routes within the site. Such impacts are likely to have a negative impact on the environment within and around the OA, will compromise the ease of movement through the site and will create a less pleasant environment for walking and cycling. Given the dual concerns of increased delay on the A4 and the general environmental implications of increased traffic volumes, any development proposals will need to be supported by a comprehensive package of measures to reduce travel demand. This will include parking restraint as set out in paragraph 10.74.

10•67 Development has the potential to worsen traffic conditions on existing streets. A review of local traffic management arrangements will be necessary and this should include a funded package of mitigations where necessary.

Key Principle TRN21:
Development should not worsen traffic conditions to unacceptable levels on existing streets and a review of local traffic management arrangements should be undertaken to address this and provide funded mitigations where necessary.

10•68 This SPD does not seek to achieve significant reductions in traffic on the Earl’s Court One Way System via new north–south routes through the OA. An assessment of the potential for using a new north–south route within the site to relieve the Earl’s Court One Way System of through traffic, which could allow for two-way operation to be introduced, was undertaken. This found that a north – south route could reduce traffic on Warwick Road by up to 18% and on Earl’s Court Road by up to 10%. To achieve this, traffic is diverted along Old Brompton Road and Lillie Road where traffic levels would more than double in the PM peak hour. Accommodating this traffic would require a major new junction on Lillie Road as well as probable road widening along Lillie Road that could not be constructed without third party land acquisition. Furthermore the level of traffic reduction achieved on the Earl’s Court One Way System would not be sufficient to introduce two-way operation.

Key Principle TRN22:
New development should investigate improvements to the Earl’s Court One Way System, including to the pedestrian environment and reducing the dominance of vehicles, and should fund a package of measures as identified in the investigation.
Road Network, car parking and freight

This SPD does not therefore seek to achieve significant reductions in traffic on the Ear’s Court One Way System via the north–south route through the redevelopment of the OA. However, the alignment of any north-south routes should have regard to RBKC’s long term ambition to return Earl’s Court One Way System to two way operation.

10.69 RBKC will continue to work with TfL to improve the Earl’s Court One Way System. This SPD requires significant improvements to the pedestrian environment in and around the Earl’s Court One Way System as set out in paragraph 10.23.

**Key Principle TRN23:**
All junctions from the OA on to the existing road network and road links across the OA should be assessed to ensure they have no unacceptable impacts on the existing road network in terms of vehicle capacity, road safety and urban design.

10.70 New north-south connections through the OA are essential to the development of the OA by providing access to the heart of the site, additional road capacity and relief to existing parallel roads. The connection of a route onto the A4 and connections on Lillie Road should be configured so that the impact on the existing highways is minimised. The exact layout and function of the routes and junctions should be agreed through the planning application process and must be supported by Road Safety Audits.

10.71 An east-west route linking North End Road to Warwick Road is essential to improve permeability through the site for pedestrians, though not for vehicles. A vehicle route from Star Road has been assessed and does not create additional congestion on North End Road. A vehicle access at Warwick Road has the potential to create conflict with pedestrians using Earl’s Court station and to compromise the quality of the proposed new public space. If such an access is included in development proposals the road safety and urban design impacts would need to be carefully assessed in a detailed Transport Assessment and it would need to be demonstrated that vehicle access is acceptable.

**Car Parking**

**Key Principle TRN24:**
Car parking levels should be minimised in order to restrain car trips, except for parking for car club vehicles, which are encouraged in order to provide an alternative to private car ownership and use.

10.72 As set out in paragraph 10.59 development proposals should seek first to mitigate any potentially negative impacts on the highway network by reducing the level of traffic generated rather than through physical interventions to manage traffic. Measures to reduce the volume of car use such as car-free development, the use of car clubs, excellent provision for cyclists and other travel demand management measures will be vital. Clear incentives will need to work with parking restraint in commercial Travel Plans. These will need to work alongside physical improvements to the network.

10.73 In general new off-street parking should be minimised and the overall parking requirements for the OA should be considered in the context of total parking, including on- and off-street provision. General public car parks will not be acceptable. In line with the Mayoral priority and borough policies to promote the use of electric vehicles, provision should be made for electric car charging points, both within new buildings and on-street. Some dedicated motorcycle
Road Network, car parking and freight

Parking should be provided. Blue badge parking for residents and visitors should be provided in line with the London Plan and local guidance.

10.74 One way of minimising car use is to ensure limited car parking is provided. Given the large scale of the development even relatively constrained parking levels of one car parking space for every 2000 m² of commercial floorspace and 0.4 spaces per residential unit means 1500 spaces. This level of parking was assumed in the Strategic Transport Study, which as outlined in paragraph 10.65 resulted in some unacceptable impacts on the highway network. In addition further traffic would reduce air quality and general residential amenity. Development in the OA should therefore provide parking at well below 0.4 space per residential unit. Car free development is encouraged with the exception of blue badge and car club parking.

Key Principle TRN25:
Development proposals should be supported by an on-street parking strategy.

10.75 The likely demand for on-street visitor parking generated by the development has been assessed and is in the order of 200 vehicles. This parking demand is largely from workers within the new commercial uses on site. In order to minimise this, and minimise the impact of any additional parking demand that remains, development proposals will need to be accompanied by a review of existing controlled parking zones as part of an on-street parking strategy that is compatible with the general objective of reducing traffic. This strategy would consider amendments to existing controlled parking zones and the need for new zones in LBHF. Development would need to fund any necessary alterations.

10.76 No new residential units will have eligibility for parking permits issued by RBKC or for existing controlled parking zones in LBHF.

Freight

Key Principle TRN26:
Development proposals should be supported by substantial measures to minimise the impact of freight, including during the construction period.

10.77 An onsite local delivery centre should be investigated as part of the new development. The centre would act as a central collection point for deliveries into the OA that could then be distributed to the local final delivery point by electric vehicle, bicycle or walking. It could also act as a holding point for deliveries for local businesses and residents who are not at home to receive the delivery. This has been proven elsewhere to reduce deliveries by up to 70%, with resulting savings in emissions and congestion. Such a centre should be able to receive 24 hour deliveries, thereby removing freight vehicles from the highways in peak periods.

10.78 Delivery and Servicing Plans and Construction Logistics Plans should be included with any planning applications.

10.79 The provision of a freight rail transfer facility for construction materials and the removal of spoil should be investigated as part of the development proposals. If this is not proposed by development the applicant will have to demonstrate why such a facility is not feasible. The facility would reduce the impact of heavy vehicles on the surrounding area and reduce the environmental impact of construction.
11 ENERGY STRATEGY
Overview

11.1 This chapter sets out requirements to ensure that new development in the OA achieves high environmental standards by reducing carbon dioxide emissions and implementing an energy strategy in accordance with the energy hierarchy, set out in the Mayor’s London Plan (2011), of:

1. Be lean (use less energy);
2. Be clean (supply energy efficiently); and
3. Be green (use renewable energy).

11.2 The final section addresses the requirements of the energy assessment that must accompany any application.

11.3 The Climate Change Act 2008 requires a reduction in carbon dioxide emissions of at least 26% by 2020 and 60% by 2050, against a 1990 baseline. The Government has recently increased this target to 80% by 2050, which will require far more stringent measures to reduce carbon dioxide emissions.

11.4 The draft National Planning Policy Framework states that the planning system should aim to "secure, consistent with the Government’s published objectives, radical reductions in greenhouse gas emissions, through the appropriate location and layout of new development, and active support for energy efficiency improvements to existing buildings and the delivery of renewable and low-carbon energy infrastructure".

11.5 GLA monitoring data shows that in 2008, 43% of carbon dioxide emissions in London were from the workplace, 36% from homes and 21% from transport. Measures to reduce emissions in London are outlined in the Mayor of London’s Climate Change Mitigation and Energy Strategy (September 2011). Reducing emissions from workplaces and homes can make a significant reduction in carbon emissions and contribute to meeting London’s and the UK’s climate mitigation targets.

Policy Context

11.6 The Mayor’s London Plan (2011):
- ‘Climate Change Mitigation’ (Policy 5.1);
- 'Minimising Carbon Dioxide Emissions' (Policy 5.2);
- ‘Sustainable Design and Construction’ (Policy 5.3);
- ‘Decentralised Energy Networks’ (Policy 5.5);
- ‘Decentralised Energy in Development Proposals’ (Policy 5.6);
- ‘Renewable Energy’ (Policy 5.7), and
- ‘Overheating and Cooling’ (Policy 5.9).

11.7 LBHF’s Core Strategy (2011):
- ‘Strategic Site and Housing Regeneration Area – FRA 1’; and
- ‘Reduce Carbon Emissions and Resource Use and adapt to Climate Change Impacts’ (Policy CC1).

11.8 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision);
- ‘Earl’s Court Exhibition Centre Strategic Site’ (Policy CA7); and
- ‘Climate Change’ (Policy CE1).
Using Less Energy

Key Principle ENE1:
Each phase of development must meet the carbon reduction targets set out in the Mayor’s London Plan (2011), with all residential development from 2016 being zero carbon and non-residential development from 2019 being zero carbon.

11.9 There are numerous ways that energy demand from buildings can be reduced (and therefore also reduce carbon dioxide emissions), such as improving insulation, using sustainable building materials, maximising solar gain, natural ventilation, reducing overheating and using energy efficient appliances. The choice of measures depends on many factors, including available technology. Development should not rely on mechanical heating or cooling, such as air conditioning. This document does not specify measures to improve energy efficiency, but requires all new development in the OA to reduce carbon dioxide emissions in accordance with the Mayor’s London Plan (2011) targets, as set out in Table 11.1.

<table>
<thead>
<tr>
<th>Residential buildings:</th>
<th>Improvement on 2010 Building Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010 - 2013</td>
<td>25 per cent (Code for Sustainable Homes level 4)</td>
</tr>
<tr>
<td>2013 - 2016</td>
<td>40 per cent</td>
</tr>
<tr>
<td>2016 - 2031</td>
<td>Zero carbon</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Non-domestic buildings:</th>
<th>Improvement on 2010 Building Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010 - 2013</td>
<td>25 per cent</td>
</tr>
<tr>
<td>2013 - 2016</td>
<td>40 per cent</td>
</tr>
<tr>
<td>2016 – 2019</td>
<td>As per building regulations requirements</td>
</tr>
<tr>
<td>2019 - 2031</td>
<td>Zero carbon</td>
</tr>
</tbody>
</table>

Table 11.1: Mayor of London’s carbon reduction targets for new residential buildings and non-domestic buildings

11.10 In addition to the Mayor’s London Plan (2011) targets, new development in RBKC will be expected to meet the relevant Code for Sustainable Homes or BREEAM standards, as set out in Core Strategy Policy CE1, at the time that detailed planning permission is sought.

Supplying Energy Efficiently

Key Principle ENE2:
Redevelopment of the OA must deliver decentralised energy (including associated district heat network) with associated energy centre(s) and infrastructure. The size (capacity), number and location of energy centre(s) must meet the energy needs of each phase of the development, with the potential to meet the needs of the surrounding area.

11.11 Supplying energy efficiently is about reducing reliance on the National Grid and requiring energy to be produced as close to demand as possible. Decentralised energy (DE) means the generation of energy close to the point of demand. This approach enables higher fuel conversion efficiencies and lower electricity distribution losses, particularly losses during the transportation of energy through the National Grid. It also allows heat released during the power generation process to be captured, distributed and used locally, often via a district heating network. District heating networks are fundamental to ensuring these efficiencies are achieved, and will enable low-carbon heat to be distributed and used for space heating and hot water in residential and non-residential buildings in the OA and beyond.
Supplying Energy Efficiently

11•12 The proposed scale of development, high heat demand, proposed mix of land uses and opportunity for laying pipe infrastructure in an integrated manner means development in the OA presents an ideal opportunity to establish DE and associated district heat network. The DE and associated district heat network will not only benefit the OA, but could be extended or connected into DE systems nearby to benefit the surrounding area.

11•13 The integration of DE in the OA is supported by a site specific Energy Study (2011) and LBHF’s and RBKC’s borough-wide heat mapping studies.

11•14 Redevelopment of the OA will need to deliver DE and associated district heat network, which must be designed and implemented in accordance with the following criteria:

- a range of fuel types need to be assessed and the reasons for selecting or discounting certain fuel types, including energy from waste (see below), need to be provided;
- heat and energy will need to be delivered through an Energy Services Company or Multiple Utility Service Company or similar, and dialogue with potential providers needs to commence at an early stage;
- DE and associated district heat network must be available to supply all buildings on occupation, which may result in one or more energy centres as part of the development or the need for temporary plant;
- the energy centre(s) must be sufficient in size (capacity) and located centrally to deliver energy to meet the needs of each phase (if several energy centres are provided) or the entire development (if one energy centre is provided) and the surrounding area in the future;
- pipe infrastructure should be installed in an integrated manner with other service infrastructure and delivered on a phased basis;
- DE provision and the supporting infrastructure must be future proofed to ensure that the network continues to support a low carbon future;
- pipe infrastructure must comply with industry standard specifications to facilitate future interconnection of other buildings and/or networks;
- the location of energy centres must not impact on the residential amenity of new and existing residents, especially considering impacts such as noise, vibration and air pollution; and
- the type of fuel selected for the DE and associated district heat network should not have unacceptable impacts on air quality and, where possible, renewable fuel sources should be prioritised.
Renewable Energy

**Key Principle ENE3:**
On-site renewable energy will be required to meet any shortfall in achieving the carbon reduction targets. The suitability of renewable energy measures will be assessed having regard to their viability, location, ‘whole life’ carbon emissions and impacts such as noise, air quality, visual appearance and biodiversity.

11•15 All potential renewable technologies, such as photovoltaic panels, solar thermal, wind, ground and air source heat pumps and biomass fuelled boilers should be assessed for their feasibility in terms of energy generation capacity, ‘payback’, suitability (building, location and compatibility with DE), ‘whole life’ carbon emissions and and likely impacts such as noise, air quality and visual appearance. The Government’s Feed-in-Tariff and Renewable Heat Incentive provide incentives for renewable energy systems in new developments, which further improve viability by reducing the payback period. The possibility of generating energy from waste using advanced technologies such as anaerobic digestion should also be explored in accordance with RBKC’s Core Strategy (2010) Policy CA7g and CE3b as this has the potential to reduce carbon dioxide emissions and provide an integrated waste management solution.

Energy Assessments

**Key Principle ENE4:**
Energy assessments must be submitted with all major planning applications and demonstrate how the targets above are to be met. Energy assessments must also demonstrate the reasons for selecting and discounting certain fuel options and renewable energy technologies.

11•16 The Mayor’s London Plan (2011) Policy 5.2C requires “major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy”. The energy assessment must show how the energy hierarchy will be implemented to meet the required carbon dioxide emission targets, taking into account the relevant Building Regulations at the time of the planning application. Energy Assessments will need to cover energy demand and carbon dioxide emissions not covered by the Regulations, with the aim of reducing carbon dioxide emissions at each stage of the hierarchy. Energy assessments must also provide detailed information on delivering decentralised energy and renewable energy systems, including all necessary infrastructure (energy centres, heat networks etc). They should also include the relevant Code for Sustainable Homes or BREEAM environmental assessments. Energy assessments must also demonstrate the reasons for selecting and discounting certain fuel options and renewable energy technologies.

11•17 It is expected that DE and the associated district heat network will be a core component in any energy strategy for the OA. The overall reductions in carbon and other emissions that can be achieved will be greater if a renewable fuel source is used. However the use of biomass fuels could increase local emissions of nitrogen dioxide (NO2) and particulate matter (PM10), potentially impacting on air quality. The potential emissions from any DE system will need to be assessed as part of an energy assessment submitted with any planning application, and will need to show how any negative impacts will be mitigated.

11•18 Energy Assessments will need to set out how the carbon reduction targets will be met within the OA. If the target for achieving zero carbon by 2016 cannot be met on-site, any shortfall will need to be met through ‘Allowable Solutions’ or financial contributions. Allowable Solutions are a project or scheme which will deliver verifiable carbon savings to meet required on-site targets to achieve zero carbon. However, Allowable Solutions cannot include measures already proposed to achieve the required carbon reduction targets, otherwise known as Carbon Compliance, as this will result in double counting.
12 ENVIRONMENTAL STRATEGY
Overview

Key Objectives

- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

12.1 The Government’s recently published draft National Planning Policy Statement (July 2011) seeks to “use the planning system to .... use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy”. Ensuring that development mitigates and adapts to the impacts of climate change is therefore central to this Environmental Strategy. Climate change mitigation by reducing carbon dioxide emissions is considered in the Energy Strategy. Climate change adaptation through resilient landscape and effective water management is considered below.

12.2 This chapter therefore sets out requirements to ensure that development in the OA addresses any impact on the environment, including the consideration of construction and demolition, water management, waste, ecology and air and noise/vibration pollution.
Demolition, Excavation and Construction Impacts

**Context**

12.3 Given the size and shape of the OA, together with the nature of existing buildings and railway infrastructure, demolition, excavation and construction are likely to be phased over a 20 year period. The impact of these activities, together with associated transport, on existing and new residents will have to be mitigated. These impacts might include:

- Construction traffic, including noise, vibration, emissions, loss of amenity, highway safety, congestion, parking and pedestrian safety;
- Light spill;
- Damage to neighbouring structures, especially heritage and archaeological assets;
- Ground movement;
- Disturbance of unexploded ordnance;
- Creation and exposure of contaminated land leading to pollution of land, air and water;
- Generation of waste;
- Dust and other emissions affecting air quality;
- Energy consumption;
- Noise and vibration; and
- Impacts on ecology.

12.4 Measures to control impacts from noise and vibration, air quality, land contamination, ecology and biodiversity and water conservation are also considered in the relevant sections of this Environmental Strategy. Mitigating the impact of transport, including the movement of construction waste, is also considered in the Transport Strategy.

**Policy Context**

12.5 The Mayor’s London Plan (2011):

- ‘Construction, Excavation and Demolition Waste’ (Policy 5.18); and
- ‘Sustainable Design and Construction’ (Policy 5.3).
- ‘Aggregates’ (Policy 5.20)

12.6 LBHF’s Core Strategy (2011):

- ‘Waste Management’ (Policy CC3); and
- ‘Protecting and Enhancing Environmental Quality’ (Policy CC4).

12.7 RBKC’s Core Strategy (2010):

- ‘Earl’s Court’ (Policy CP10 and associated Vision);
- ‘Infrastructure Delivery and Planning Obligations’ (Policy C1);
- ‘Waste’ (Policy CE3);
- ‘Air Quality’ (Policy CE5); and
- ‘Noise and Vibration’ (Policy CE6).

12.8 Many of the impacts from demolition, excavation and construction (including air quality, noise, vibration, dust, land contamination and asbestos) are also controlled through other legislation, standards and guidance, such as:

- The control of dust and emissions from construction and demolition; Best Practice Guidance (Mayor of London and London Councils 2006);
- The Construction (Design and Management) Regulations 2007;
- The Control of Asbestos Regulations (2006);
- BS5228: Control of Noise and Vibration on Construction and Open Sites;
- The Site Waste Management Plans Regulation (2008);
- The Definition of Waste: Development Industry Code of Practice, version 2 (CL:AIRE, 2011);
- Control of Pollution Act 1974; and
- Environmental Protection Act 1990.
Demolition, Excavation and Construction Impacts

Mitigating Impacts from Demolition, Excavation and Construction

Key Principle ENV1:
Demolition and excavation waste, including contaminated waste, should be treated, recycled and reused on-site as much as possible. Where this is not possible, this waste, together with construction materials, should be transported in a sustainable manner, where rail is the preferred transportation method, and disposed of in an approved manner.

12.9 The remediation, recycling and reuse of contaminated demolition and excavation waste will need to meet the highest standards of environmental sustainability. Demolition and excavation waste should be remediated, recycled and reused on site. Any on-site demolition, excavation or construction plant must minimise any impacts from noise, vibration, dust and emissions on existing and new residents. An assessment of the environmental impacts of remediation works must be undertaken to determine the most appropriate method.

12.10 Any remediation must be in accordance with the seven stage approach outlined in the Land Contamination Strategy, set out under Key Principle ENV14. A ‘soil hospital’ where soil can be remediated for re-use on-site should be established in the OA. Areas should also be designated for storing other recycled materials for re-use on-site.

12.11 Redevelopment of the OA has the potential to generate many thousands of vehicle movements over a 20 year construction period, especially considering the volume of demolition and excavation waste and construction materials. These vehicle movements are likely to put pressure on the existing traffic network around the OA. Where remediation, recycling and re-use of materials on-site is not feasible, materials should be transported using the most sustainable method. The West London Line runs along the middle of the OA under Earl’s Court 2 and is well located to facilitate the transportation of demolition waste and construction materials by rail. In accordance with LBHF Core Strategy Policy CC3 and RBKC Core Strategy Policy CE3d, development proposals should make use of the rail and waterway network for the transportation of construction waste and other waste. The transportation of contaminated materials must also be considered in any construction management plans or site waste management plans produced for the OA.

Key Principle ENV2:
Construction, demolition and excavation logistics plans must be prepared for every phase of construction and demolition. Access points into the site must be assessed in terms of highway safety, impact on air quality, noise and vibration and also impacts on the new and existing population.

12.12 Given the size of the OA and phased approach to construction, it is likely that several vehicle access points will be required during the demolition, excavation and construction period. The number of vehicle access and exit points should be minimised and where required, these should be located where they have the least impact on the traffic network; vehicle, cycle and pedestrian safety; and existing amenity within and surrounding the OA.

12.13 Detailed construction, excavation and demolition logistics plans must submitted to the relevant Local Authority for every phase of development. These will form part of wider construction, excavation and demolition management plans. Construction, excavation and demolition logistics plans must deal with all aspects of construction and demolition vehicle management, including demolition transportation arrangements, delivery schedules, delivery bookings, routing of vehicles and delivery and turning facilities. Swept paths and tracking diagrams will also need to be included in the plans.
Demolition, Excavation and Construction Impacts

Site access points in predominantly residential areas must be avoided, unless there is no other reasonable alternative in which case any impact on the residential amenity must be minimised. Queuing of construction vehicles on the highway network will not be permitted.

**Key Principle ENV3:** Planning conditions will be used to require Construction Environmental Management Plans (CEMPs) before any demolition, excavation and construction on each phase of development. Developers will need to keep the new and existing population informed of the progress of the demolition and construction and information on all environmental impacts.

12.14 The OA is surrounded by a number of existing noise and air pollution sensitive land uses, including a large number of homes, educational facilities, health facilities, community facilities, shopping and leisure uses. The Council will therefore control the impacts of these at source by requiring CEMPs before any excavation, demolition and construction occurs at each phase.

12.15 The CEMPs must include (although not be restricted to):
- An application for Prior Consent for the Works (Section 61 of the Control of Pollution Act 1974) prepared in accordance with BS5228;
- Information on the works and the methods by which they are to be carried out;
- The steps proposed to minimise noise resulting from the works;
- The type of plant to be used and its noise characteristics;
- A programme and sequence of works indicating the predicted noise and vibration levels for each activity at specified noise sensitive sites for each phase of the works;
- Where work phases overlap the cumulative noise and vibration impacts shall be predicted;
- Noise monitoring proposals and methodology;
- Measures to inform the existing population on the progress of works and predicted noise levels over a period of time, including site notice boards and weekly resident liaison meetings;
- Traffic and construction logistics, including measures to reduce vehicle movements;
- Safety for highway users, cyclists and pedestrians;
- Minimising lighting and light spill;
- Protection of heritage assets;
- Procedures for dealing with uncovered archaeological sites;
- Site remediation and procedures for dealing with contaminated material;
- Procedures for dealing with unexploded ordnance;
- Measures for the protection of water resources and preventing contaminated runoff;
- Demolition and construction waste management procedures;
- Measures to prevent and control dust and other emissions to air;
- Energy conservation;
- Measures to protection ecological resources;
- Approaches to screening, including the erection of a solid 2.4m high hoarding around the boundary of each phase, with openings for the public to see the progress of the works; and
- Measures for protecting the wider environment, such as noise, air quality and water, from stockpiled contaminated demolition and exaction waste material.

12.16 Local air quality impacts are also likely during the demolition, excavation and construction phases of the development. The CEMP will also need to identify measures to control and monitor air pollution, taking into account the Mayor of London and London Council’s guidance document ‘The Control of Dust and Emissions from Construction and Demolition’. Due to the extended construction phase and proximity of sensitive receptors, real-time air quality monitoring (including baseline monitoring) will be required, where the authorities will need to agree the location of the monitoring equipment, the site trigger...
Demolition, Excavation and Construction Impacts

12•17 There are no designated Archaeological Priority Areas within or adjacent to the OA. However, there is some potential for Roman and earlier archaeology within the OA. The Counter’s Creek that ran through the OA also has some topographic, and potentially archaeological, importance. As the OA has archaeological potential, planning conditions will be used to require field evaluations to further understand the archaeological potential of the OA.

12•18 Apart from exceptional circumstances (such as work affecting Underground and Railway Lines undertaken during engineering hours or possessions), noisy building works which can be heard at the boundary of the site can only be carried out during the following permitted hours: Monday to Friday (08:00 to 18:00); Saturday (08:00 to 13:00) and at no time on Sundays or Bank Holidays. Any works carried out outside of permitted hours will need to be kept to a minimum, will be strictly controlled by the borough’s Environmental Health departments and the surrounding community will need to be given prior notice.

12•19 Construction noise and hours of operation are controlled by the borough’s environmental health officers through Sections 60 and 61 of the Control of Pollution Act 1974.

12•20 The noise level at which construction and demolition becomes significant will be assessed in accordance with Annex E of BS 5228-1: 2009. Significance will be based on absolute facade levels of 70dBLAeq/day where existing ambient noise levels, between 08.00 and 18.00, are within the PPG 24 range of noise levels for Noise Exposure Category A and B and 75dBLAeq/day where existing ambient noise levels are within the range of noise levels for NEC C and D. The duration criteria of E4 of Annex E will also apply.

12•21 Given the close proximity of new and existing residents to the OA, demolition and construction methods should be selected to minimise their environmental impacts on residents in the surrounding area.

12•22 Developers will be required to establish a Community Liaison Group (comprising construction, local authority and community representatives) managed by a Community Liaison Manager.

12•23 In accordance with the Site Waste Management Plans Regulations 2008, Site Waste Management Plans (SWMPs) will be required for all developments over £300,000. SWMPs will demonstrate, among other things, how materials will be sourced and used efficiently to minimise waste generation.
Flood Risk and Sustainable Water Management

Context

12•24 Much of West London, including the OA, is underlain by a shallow aquifer within river terrace deposits along with a deep aquifer within Thanet Sand and Upper Chalk formations. The Environment Agency note that the river terrace deposits underlying the OA constitute a ‘Secondary Aquifer’ of variable permeability. Records of shallow groundwater levels at the site are unavailable, although groundwater is typically encountered at depths of about 1.5 to 2.0m. A recent report on groundwater levels in the Chalk aquifer (Environment Agency 2007) indicates that the deep aquifer is located about 19m below ground level and the groundwater flows eastwards.

12•25 Surface water historically drained into the Counters Creek, located in the general area of the existing railway corridor. Counters Creek was then moved to become a combined sewer located under Warwick Road. Given the substantial level changes across the site, surface water at EC1 and EC2 drains eastwards into the Counters Creek sewer. All other former surface drainage ditches are located in sewers, predominantly flowing westwards across the site towards North End Road.

12•26 Sewerage infrastructure within the area is largely Victorian and contained within a combined storm water and foul water sewer system. The Counters Creek sewer is the most significant combined sewer in the area, serving an area as far north (upstream) as Brent and Camden. In addition to this, an integrated network of sewers and combined sewers traverse the OA. There are issues related to the capacity of this combined sewer in severe storms (see below), which have the potential to affect properties in the area of this combined sewer.

12•27 The River Thames is located approximately 1.5km to the south of the OA. Water levels in the Thames in this location are subject to tidal movements, yet fluvial flows are relatively insignificant. Flood defences protect this part of London from the risk of flooding associated with tidal and storm surge events.

12•28 A joint Strategic Flood Risk Assessment (SFRA) was carried out for RBKC, published in August 2009 and LBHF, published in June 2010. The SFRA identifies that the majority of the OA in LBHF is located within Flood Zone 3, as defined by the Environment Agency. The area identified as Flood Zone 3 has a high probability of flooding, having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year. A small part of the OA, in the area of North End Road and north of West Brompton station, is identified as Flood Zone 2, having a medium probability of annual flooding. This zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year. The remainder of the OA (the exhibition centres) is within Flood Zone 1, having a low probability of annual flooding of less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).

Policy Context

12•29 The Mayor’s London Plan (2011):
• ‘Climate Change Mitigation’ (Policy 5.1),
• ‘Urban Greening’ (Policy 5.10),
• ‘Green Roofs’ (Policy 5.12),
• ‘Flood Risk Management’ (Policy 5.12),
• ‘Sustainable Drainage’ (Policy 5.13),
• ‘Water Quality and Wastewater Infrastructure’ (Policy 5.14), and
• ‘Water use and Supplies’ (Policy 5.15).

12•30 LBHF’s Core Strategy (2011):
• ‘Water and Flooding’ (Policy CC2).

12•31 RBKC’s Core Strategy (2010):
• ‘Earl’s Court’ (Policy CE2).
• ‘Climate Change’ (Policy CE1), and
• ‘Flooding’ (Policy CE2).

12•32 London Draft Water Strategy (2009)
Flood Risk and Sustainable Water Management

**Sewer and Surface Water Flooding**

**Key Principle ENV5:**
Development in the OA will need to ensure that the peak flows entering any combined sewer will either be matched or reduced in comparison to existing peak flows, taking into account the impact of climate change. Developers must consult with and reflect the views of Thames Water and the Environment Agency on the design, capacity, size and construction of the proposed stormwater and sewer network.

12•33 The combined sewer network (owned and operated by Thames Water) and in particular the Counters Creek sewer, poses the greatest risk of flooding in the OA. This is mainly due to the vast catchment area and the limited capacity of the sewer, which has the potential to back up during extreme rainfall events. This has occurred on several occasions, most recently in July 2007, when several properties along Counters Creek in LBHF and RBKC reported localised flooding.

12•34 Climate change, and in particular the possible increase in storms, has the potential to increase flood risk. The impacts of climate change therefore need to be taken into account when considering the capacity of, and flows entering, the combined sewer network.

12•35 Thames Water is preparing a bid to Ofwat for funding for the Counters Creek Sewer Flood Alleviation Scheme which will increase the capacity of the sewer network. Subject to securing funding from Ofwat and any necessary planning permissions and consents, construction could commence in 2014 with completion likely in 2018. However, the scheme is not yet confirmed. Regardless of the outcome, development must still meet the principles set out above. Thames Water is working with the developer to assess the impact of the development on surface water and foul water drainage.

12•36 Where possible, gravity should be used to direct flows into the combined sewer network. If pumps are proposed, these should be carefully maintained to guarantee all year round use, so as to not increase flood risk, and sustainably powered to minimise carbon emissions.

**Flood Risk Assessment, Mitigation and Adaptation**

**Key Principle ENV6:**
A Flood Risk Assessment (FRA), including an Exception Test, must be submitted with any major planning applications in the OA as required in accordance with Planning Policy Statement 25.

12•37 In accordance with the Government’s Planning Policy Statement 25, RBKC and LBHF have both produced ‘Sequential Tests’, which seek to prioritise development in Flood Zone 1, then Flood Zone 2 and lastly Flood Zone 3. As 60% of LBHF lies within Flood Zones 2 & 3, LBHF’s Core Strategy (2011) states that it would be unreasonable to restrict development to the remaining 40%. Development proposals within the RBKC portion of the OA will need to have regard to findings and recommendations contained within the Council’s Sequential Test for the Earl’s Court Strategic Site allocation, June 2009.

12•38 Planning Policy Statement 25 requires planning applications for development proposals of 1 hectare or greater in Flood Zone 1 and all proposals for new development located in Flood Zone 2 and 3 to be accompanied by a FRA. As the OA in LBHF is located with Flood Zone 2 and 3 and the OA in RBKC is larger than 1 hectare a site specific FRA will be required to accompany applications for comprehensive redevelopment. FRAs will also be required for detailed planning applications at each phase. The FRA must identify all potential sources of flood risk within the OA and consider approaches to mitigate any risks identified. The FRA must consider the cumulative impacts of different phases, any impacts on surrounding areas, such as upstream of sewer infrastructure, and the impacts of climate change. The Environment Agency and Thames Water must be consulted on future planning applications.
Flood Risk and Sustainable Water Management

in the OA, including each FRA, and their comments will be taken into account when determining planning applications. Furthermore, as much of the OA is located within Flood Zone 3 and contains land uses classified as “more vulnerable” an exception test is required as part of the planning application.

**Key Principle ENV7:**
Self contained basement dwellings will not be permitted in Flood Risk Zone 3. All habitable basement rooms within the OA must be equipped with pumps and non-return valves, and have suitable alternative means of escape.

12.39 In accordance with the Government’s Planning Policy Statement 25, self contained basement dwellings will not be permitted in Flood Zones 3. Decking over the railway and TfL depot will change the ‘ground level’, so development in the OA will need to ensure that any changes in ground level will not increase the risk of flooding, especially where new ‘basement’ dwellings could be created. The Environment Agency does not object in principle to residential units located 600mm above the statutory flood level provided suitable means of escape are provided and non-return valves are installed.

**Key Principle ENV8:**
Residential development should be designed to limit mains water consumption to 105 litres per person per day or less.

12.40 The London Water Strategy promotes a simple hierarchy for strategic water management of ‘lose less’, ‘use less’ and ‘reclaim more’. The London Plan Policy 5.15B sets out the Mayor’s policy for water consumption, requiring development to minimise the use of mains water by incorporating water saving measures and equipment and designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day. In addition to this, RBKC Core Strategy (2010) Policy CE1 requires development to meet certain Code for Sustainable Homes and BREEAM targets, which include targets for water consumption.

12.41 Given the presence of an aquifer beneath the OA, borehole abstraction should be investigated as a possible source of potable water. Rainwater harvesting should also be integral to building design. Rainwater harvesting measures can range from simple water butts to more complex systems linking buildings. Rainwater can be used for all non-drinkable uses, such as garden watering, car washing, toilet flushing and clothes washing. Rainwater harvesting must consider the cost and possible carbon emissions from pumping and filtration associated with capture compared with mains water. Gravity fed rainwater harvesting systems are preferred to pumped systems.

12.42 To ensure water efficiency, all water using appliances installed in buildings in the OA (such as washing machines, dishwashers and shower heads) should be water efficient and industry coded as such. Water butts, aerated and spray taps, low-flow and dual flush toilets, vacuum drainage systems and waterless urinals should also be considered. This will be secured through condition or s.106 agreement as appropriate.

**Sustainable Urban Drainage Systems (SUDS)**

**Key Principle ENV9:**
Development in the OA should aim to reduce the volume of the undeveloped site’s surface water run-off at peak times to Greenfield run-off rates or better. Where possible development should aim to achieve 100% attenuation or at the very least 50% attenuation on site, ensuring that surface water run-off is managed as close to its source as possible in accordance with the drainage hierarchy in the London Plan (Policy 5.13). SUDs must be incorporated into the design of buildings and public realm.
Flood Risk and Sustainable Water Management

12.43 In addition to flood risk mitigation measures identified through the FRA and Sequential Test, development must incorporate SUDs to reduce the volume and rate of surface water runoff entering the storm water network.

12.44 SUDs, either integrated into open space or buildings, are used to a) ease the rate of surface water entering the stormwater system during intense periods of rain, b) allow surface water to be absorbed into the ground as near to where it falls as possible and c) generally reduce the risk of surface water flooding. SUDs can also improve the quality of stormwater run-off, promote biodiversity and provide amenity to open space.

12.45 Large parts of the OA consist of impermeable surfaces and hard standing which contribute to surface water flooding. The impermeable surfaces and hard standing are predominantly found in the area of Earl’s Court 1 and 2, where decking is used to support the structure above the railway lines. There is also hard standing around the Empress State Building and the TfL Lillie Road Depot. Redevelopment of the OA must maximise sustainable urban drainage and where decking, hard standing or impermeable surfaces are required, surface water should be managed as close to its origin as possible and drained to areas of the OA where SUDs are provided.

12.46 There are numerous SUDs measures that could be implemented across the OA, including:

- Integrating green space, soft landscaping and planting, which are able to cope with extreme weather conditions, to reduce the impact of overheating, provide shade and attenuate stormwater flows;
- permeable and semi permeable surface materials (including materials used for pavements, driveways and highway construction);
- vegetated swales, basins, drainage channels, infiltration trenches and filter drains, retention ponds, wetlands and rain gardens;
- public and private gardens, green corridors and site wide native planting, including shrubs and trees;
- green and brown roofs and walls integrated into building design; and
- attenuation tanks and permeable soak aways.

12.47 Green and brown roofs on buildings require an impermeable membrane to ensure that water does not leak through the roof structure. This membrane then supports a layer of substrate and native vegetation. In addition to absorbing rainfall and dissipating stormwater runoff, green and brown roofs and green walls can sometimes improve the thermal performance of buildings and contribute to residential amenity. It is important that green and brown roofs are well maintained by those who manage the building.
Waste Management

Context

12.48 The amount of household waste generated in LBHF has decreased by 18 percent since 2005, whilst the recycling rate has increased from 21 percent to 27 percent. In RBKC, household waste generation (by weight) has decreased by 7 percent since 2005 and the recycling rate has increased from 20 percent to 31 percent. The recycling rates in LBHF and RBKC are higher than many other London Boroughs and greater levels of recycling are anticipated in the medium to long term, as assessed against the Mayor’s London Plan (2011) targets.

12.49 Both boroughs’ waste transfer, disposal, recycling and processing services are currently provided by the Western Riverside Waste Authority (WRWA). These arrangements will continue due to contractual obligations until 2025. Municipal waste from within the WRWA area that previously went to landfill now goes to a new river fed energy-from-waste incinerator at Belvedere, Bexley. Co-mingled dry recycled material is now processed within the WRWA area, following the recent opening of a new facility at Smugglers Way, Wandsworth.

12.50 The Waste Management Strategy for London (2010) sets the following targets:

- achieve zero municipal waste direct to landfill by 2025;
- reduce the amount of household waste by 20 percent by 2031;
- recycle or compost at least 45 per cent of municipal waste by 2015, 50 per cent by 2020 and 60 per cent by 2031; and
- reuse and recycle 95 per cent of construction, excavation and demolition waste by 2020.

12.51 There are currently no dedicated waste or recycling handling facilities within the OA. All commercial waste generated by The Earl’s Court Exhibition Centres is currently collected by a private contractor and disposed of under separate arrangements.

Policy Context

12.52 The Mayor’s London Plan (2011):
- ‘Waste Self-Sufficiency’ (Policy 5.16), and
- ‘Waste Capacity’ (Policy 5.17).

12.53 LBHF’s Core Strategy (2011):
- ‘Waste Management (Policy CC3).

12.54 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision),
- ‘Earl’s Court Exhibition Centre Strategic Site’ (Policy CA7), and
- ‘Waste’ (Policy CE3).


Waste Management

Waste Collection and Management Systems

Key Principle ENV10:
Redevelopment of the OA must deliver sustainable waste collection and management systems, taking into account industry best practice.

12.57 To deliver sustainable waste collection and management systems, development in the OA must accord with LBHF’s ‘Storage of Refuse and Recyclables’ SPD and RBKC’s ‘Wastescape Design Guide’ and incorporate the following principles:

- Maximise recycling and waste diversion at source (e.g. in kitchens);
- Integrate with existing waste collection systems and infrastructure in LBHF and RBKC;
- Be cost effective;
- Accommodate green waste diversion and composting;
- Provide sufficient size and easily accessible refuse and recycling storage areas;
- Minimise refuse vehicle movements;
- Ensure that the highway network can accommodate refuse vehicles;
- Ensure that on-street street parking does not obstruct refuse vehicles; and
- Provide easily accessible bulky waste collection areas.

12.58 The authorities consider that a combination of standard bin stores and a chute-based suction system (Envac) would be most suited to development in the OA.

12.59 In accordance with the Site Waste Management Plans Regulations 2008, Site Waste Management Plans must be prepared and implemented for development in the OA. The Site Waste Management Plan must be prepared in accordance with Defra Guidance and will be secured via any Section 106 agreement.

Centralised Waste Facility

Key Principle ENV11:
At least one centralised waste management facility must be provided in the OA.

12.60 At least one centralised, on-site, waste management facility must be provided in the OA to manage the collection, sorting and storage of waste (including bulky items). This facility must be large enough to accommodate waste generated from the development at each phase and contribute to meeting the borough’s waste apportionment targets. This facility should not impact on new or existing residential amenity, in terms of air quality and noise. Location, mitigation measures and/or a suitable buffer will therefore be required between any waste facility and sensitive land uses, such as residential dwellings. This facility will also be subject to the requirements in the Air Quality and Noise / Vibration sections of this Environmental Strategy. A centralised facility would ideally be located underground on the periphery of the OA and have good vehicular access to the strategic road network. Development proposals should also explore and where deemed appropriate use the waste facility to generate energy from waste.
Waste Management

Encouraging Waste Minimisation, Reuse and Recycling

Key Principle ENV12:
In addition to regulatory approaches, redevelopment in the OA should contribute towards reducing, reusing and recycling waste through non-regulatory and education based approaches.

12.61 In addition to regulated waste collection and management systems there are numerous non-regulatory and education based approaches to reduce, reuse and recycle waste, that should be implemented in the OA.

12.62 Cupboards with integrated waste sorting facilities should be installed in every kitchen to encourage the separation of waste from recyclables. All kitchens, and other points of waste disposal, should also provide information on what can and cannot be recycled. Information should also be provided on waste reduction, such as buying loose fruit and vegetables to minimise packaging; using reusable bags and lunch boxes to reduce the use of plastic bags; buying goods in bulk, such as washing up liquid; insisting on ‘no junkmail’; using taps or home filtered water rather than bottled water; buying products from recycled materials and composting garden waste.

12.63 Waste minimisation measures should be promoted by on-site waste management arrangements and approaches to changing behaviour in consultation with LBHF and RBKC waste and recycling officers.

Composting

Key Principle ENV13:
Redevelopment of the OA should provide green waste and kitchen waste collection to support a community led composting scheme.

12.64 Composting can be undertaken on a small scale domestic basis or community wide composting could be delivered through green and kitchen waste collection and disposal. Developers in the OA should set up a community led composting scheme, taking into account the guidance of the Community Composting Network (CCN).
Land Contamination and Remediation

Context

12.65 A rich history of industrial land uses and practices has resulted in the potential contamination of land within the OA. These land uses include a former coal and goods depot, railway sidings, a brewery, laundries, an in-filled canal and some works and factories that included chemical and fuel storage. Adjacent to the OA, potentially contaminative uses include a former brickfield (in-filled with unknown material), a rifle range and a hospital. Current potentially contaminative uses include the TfL depot, laundries, dry cleaners and a mannequin manufacturer. Nearby off-site potential sources include a petrol station.

12.66 The portion of the OA within LBHF and some parts within RBKC are therefore identified as potentially contaminated (under Part IIA of the Environmental Protection Act 1990) due to the probable risks associated with the past and present uses of the site.

12.67 Land within the OA must be suitable for use prior to development and all potential contamination must be identified, assessed and remediation must be implemented. Remediation should be sustainable and not adversely impact the environment.

Policy Context

12.68 The Mayor’s London Plan (2011):
- ‘Contaminated Land’ (Policy 5.21).

12.69 LBHF’s Core Strategy (2011):
- ‘Protecting and Enhancing Environmental Quality’ (Policy CC4).

12.70 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision).

12.71 RBKC’s Unitary Development Plan (2002) Saved Policies:
- ‘Require additional information for developments on contaminated land’ (Policy PU3), and
- ‘Ensure appropriate protection for future users of contaminated land’ (Policy PU4).

12.72 Guide to help developers meet planning requirements, 2004 (various boroughs including RBKC but excluding LBHF), which is to be updated in 2011.

12.73 LBHF Draft Guidance for Developers of Land where Contaminated Land may be an Issue (2011)

12.74 Land contamination is also controlled through other legislation, such as:
- Part IIA of the Environmental Protection Act 1990;
- Contaminated Land (England) Regulations 2006;
- Defra Circular 01/2006 Contaminated Land Statutory Guidance;
- Environmental Permitting (England and Wales) Regulations 2010;
- The Hazardous Waste (England and Wales) Regulations 2005;
- The Environmental Damage (Prevention and Remediation) Regulations 2009; and

12.75 Guidance also exists to aid developers, environmental consultants and local authorities in addressing potentially contaminated land, including:
- CLR 11: Model procedures for the management of Contaminated Land (Defra, 2004);
- BS10175, The Investigation of Potentially Contaminated Land Sites;
- The Definition of Waste: Development Industry Code of Practice, version 2 (CL:AIRE, 2011);
- Assessing risks posed by hazardous ground gases to buildings (CIRIA 665, 2007); and
- The VOCs Handbook. Investigating, assessing and managing risks from inhalation of Volatile Organic Compounds (VOCs) at land affected by contamination (Ciria 682, 2009).
Land Contamination and Remediation

Assessment and Sustainable Remediation

Key Principle ENV14: 
Construction in the OA shall only begin once any potential land contamination has been identified, assessed and remediated in accordance with the stages below.

12.76 Potentially contaminated land should be identified, assessed and remediated in accordance with the following seven stages:

- **Preliminary Risk Assessment:** This assessment should comprise of a desk top study which includes details of past and present uses at the site and the surrounding area to identify any potential sources of contamination. This should include a search of Council planning records. Any pollutants associated with these sources should be identified along with their potential related risks. It should then be determined what sensitive receptors are likely to be present at the development site such as humans, ecological receptors or building materials. Any pathway from potential on-site sources to off site sensitive receptors should also be identified. A conceptual site model should be produced to demonstrate where any pathway connects any of these sources to the sensitive receptors. This Source-Pathway-Receptor connection is known as a pollutant linkage.

- **Site Investigation Scheme:** This scheme is based upon the preliminary risk assessment and should set out how the site investigation will be carried out, how the sources of pollution identified in the conceptual site model will be targeted and determine the existence of the pathway to the identified receptors.

- **Site Investigation:** This investigation should follow the approved scheme and be undertaken using current guidance and methods. The results of the investigation must be clearly presented, compared against recognised and approved standards and interpreted so that it is clear for both Councils to see where remediation action is required.

- **Risk Assessment:** The results of the site investigation should be assessed to determine the degree and nature of any contamination on the site and the risks posed by any contamination to human health, controlled waters and the wider environment. The conceptual site model should be revised with the information gathered through the site investigation to confirm the existence of any remaining pollutant linkages.

- **Remediation Strategy:** A detailed method statement for any required remediation works identified through the risk assessment should be produced with the aim of breaking any pollutant linkages.

- **Verification:** A report should be produced which validates and verifies that all of the works outlined in the remediation strategy have been undertaken as agreed. This would include details such as analytical results confirming successful in-situ remediation or importation or clean top-soil cover, the proper placement of gas membranes and waste transfer tickets demonstrating a duty of care in handling any off site transfer of excavated soil.

- **On-going monitoring:** If during development, contamination not previously identified is found to be present at the site, the Council should be immediately informed and no further development (unless agreed in writing by the Council) shall be carried out until a report indicating the nature of the contamination and how it is to be dealt with is agreed in writing by the Council. There may also be situations in which confirmation that remediation has been successfully achieved or abated is necessary and monitoring past the completion of development is required. The scope of any monitoring should be agreed in writing by the Council. These works should then be reported to and agreed in writing by the Council, when it is demonstrated that no residual adverse risks exist.
Key Principle ENV15:
The remediation strategy will need to demonstrate that measures with the least environmental impact have been selected, especially considering transport and on-site treatment.

12.77 During the investigation, remediation, validation and on-going monitoring of potentially contaminated land, works with the least environmental impact should be selected. Environmental impacts should include carbon emissions, transportation of waste, air pollution, water pollution and noise and vibration from the works. In particular, an assessment of the environmental impacts of remediation works must be undertaken to determine the most appropriate method. The removal of contaminated land off-site should be considered the last option after more sustainable methods such as in-situ and on-site remediation. The phased approach to this development provides an opportunity to locate stockpiles of material for re-use on-site, near the soil hospitals where this material would be treated. Any in-situ remediation which may alter the hydrogeology of the site should be assessed to ensure it does not adversely impact surface water drainage and groundwater flow in the area.
Air Quality

Context

12.78 LBHF and RBKC are both designated as Air Quality Management Areas (AQMA). This designation is due to levels of nitrogen dioxide (NO2) and particulate matter (PM10) in both boroughs that breach the Government’s air quality objectives. Vehicles using Talgarth Road/West Cromwell Road (A4), Warwick Road, North End Road and Lillie Road are one of the main sources of NO2, PM10 and PM2.5 emissions affecting the OA. Buildings are also responsible for a significant amount of local emissions, especially NO2 from gas boilers. Figures 12.6 and 12.7 show the predicted annual mean levels of PM10 and NO2 in 2008 respectively, using data from the London Atmospheric Emissions Inventory 2008 (http://data.london.gov.uk/laei-2008). Figure 12.8 shows the number of days per year (in 2010) that PM10 exceeded the Government’s objectives.

Policy Context

12.79 The Mayor’s London Plan (2011):
- ‘Improving Air Quality’ (Policy 7.14)

12.80 LBHF’s Core Strategy (2011):
- ‘Protecting and Enhancing Environmental Quality’ Policy CC4.

12.81 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision)
- ‘Air Quality’ (Policy CE5).

12.82 RBKC Air Quality SPD (2009) and Air Quality Management Progress Report (updated annually)
Air Quality

Improving Air Quality

12.83 A Low Emission Strategy (LES), incorporating an air quality assessment which compares current and future emissions, will be required to assess the current and future air quality within the OA. The LES also needs to consider the potential air quality impacts, including health impacts on residents and other sensitive receptors, following each phase of development in the OA.

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

12.85 The adoption of energy efficient building design and integration of low / zero carbon heat technologies (such as Combined Heat and Power (CHP) systems, heat networks, photovoltaics, heat pumps etc) can help to reduce NO2 emissions from domestic and commercial gas boilers. However, some renewable technologies, such as biofuelled CHP plants and biomass energy systems, can potentially increase local emissions of NO2 and PM10, possibly impacting on air quality. The LES will therefore need to demonstrate how the impacts from any proposed installations are mitigated.

12.86 In addition to the Mayor of London’s Air Quality Strategy (2010), both boroughs have air quality action plans setting out measures to reduce emissions, improve local air quality and work towards meeting Government objectives. There are a number of mitigation measures, both regulatory and non-regulatory, that can help to reduce the impact of development on air quality. The LES will need to consider the feasibility of each of the following (but not limited to) mitigation measures:

- incorporate significant tree planting, planted areas or other green landscaping as barriers along major roads;
- limit emissions from heating and cooling of buildings by using passive heating and cooling designs and the use of low emission low/zero carbon technologies and where necessary use abatement technology;
- limit the ratio of off-street car parking to new dwellings in accordance with the Transport and Accessibility Strategy (Chapter 10) thus encouraging a low level of car ownership;
- require 20% of car parking spaces to provide electric vehicle charging facilities to encourage the uptake and use of these vehicles;
- implement 20mph zones and shared surface treatments on certain roads to reduce through traffic; and
- encourage walking and cycling by improving connectivity through the OA, improving access to public transport and requiring a green travel plan.

This may also be necessary to implement design solutions to minimise exposure to poor air quality, such as locating less sensitive uses in areas of poor air quality and/or incorporating appropriate mitigation measures.
Noise and Vibration

Context

12.87 The main sources of noise and vibration in the OA are from road traffic, London Underground trains, West London Line trains (including freight trains) and aircraft on the Heathrow flight paths. The use of the TfL Lillie Road Depot for emergency track repairs and events at the Exhibition Centres also causes noise and vibration although these two sources of noise will be discontinued with redevelopment of the OA.

Policy Context

12.88 The Mayor’s London Plan (2011):
- ‘Reducing Noise and Enhancing Soundscapes’ (Policy 7.15).

12.89 LBHF’s Core Strategy (2011):
- ‘Protecting and Enhancing Environmental Quality’ (Policy CC4).

12.90 RBKC’s Core Strategy (2010):
- ‘Earl’s Court’ (Policy CP10 and associated Vision); and
- ‘Noise and Vibration’ (Policy CE60).

12.91 Sounder City – The Mayors Ambient Noise Strategy

12.92 RBKC Noise SPD (2009)

12.93 Noise and vibration is generally controlled through environmental protection legislation and British Standard Codes of Practice, including:

- World Health Organisation: Guidelines for Community Noise (1999);
- BS 8233:1999 (Sound Insulation and Noise Reduction for Buildings – Code of Practice);
- BRE/ Ciri ‘Sound Control For Homes’
- BS 4142: 1997 - Rating industrial noise affecting mixed residential and industrial areas;
- BS 6472:2008 ‘Guide to Evaluation of human exposure to vibration in buildings (1Hz to 80Hz)’;
- Building Bulletin 93 (BB93): Acoustic design of schools;
- Approved Document E - Resistance to the passage of sound;
- Control of Pollution Act 1974; and
- BS Code of Practice BS 5228 for noise vibration control on construction sites.
Noise and Vibration

Mitigating Noise and Vibration

Key Principle ENV17:
Development must be designed and constructed to mitigate and adequately control noise and vibration. Noise and vibration sensitive land uses must also be located away from sources of noise and vibration, unless mitigation measures reduce the noise and vibration to acceptable levels.

12.94 In addition to the existing sources of noise and vibration, several proposed land uses in the OA have the potential to generate noise or vibration. These include new cultural facilities, bars and restaurants, road traffic, delivery vehicles and building services plant. Noise and vibration associated with the construction and demolition process is also a concern for the existing population, especially given the scale of development, phasing and the long term duration of construction. This is further considered in the section on ‘Demolition, Excavation and Construction Impacts’.

12.95 Planning applications in the OA must be accompanied by a noise impact assessment, prepared in consultation with authority Environmental Health Officers. This assessment will need to identify existing and potential sources of noise and vibration and the potential impacts and mitigation measures for the existing and new population. Noise sensitive land uses, such as residential dwellings, schools and hospitals, are those sensitive to existing sources of noise. The noise impact assessment will also need to determine the Peak Particle Velocity (PPV) and Vibration Dose Value (VDV) levels to establish the impact of traffic, including the impact of freight and passenger trains using the West London Line and District Line on buildings and general amenity.

12.96 In accordance with National and European legislation, the Department for Environment, Food and Rural Affairs (Defra) is currently implementing a requirement to prepare Noise Action Plans (NAPs) that address and improve noise within the noisiest areas. The London Agglomeration NAP (March 2010) identified roads adjacent to the OA, including West Cromwell Road and Warwick Road, as containing “1st priority” locations for further investigation of traffic noise levels. The Highway Authority, in consultation with Environmental Health, must give consideration to how traffic noise in these 1st Priority Locations can be minimised through the use of appropriate mitigation measures. Given the scale of the proposed development, its location bounded by four major roads and the likely impact of road traffic noise from the development, the NAP shall be required to include the major development proposals within the OA. Applicants will need to work closely with the Highway Authority and Environmental Health Departments to ensure that development proposals contribute to the production and implementation of the Defra NAP.

Residential Noise Standards

12.97 All new housing should be designed to ensure that the internal noise levels are ‘good’ in accordance with BS8233, where individual noise events should not normally exceed 45 dB LAMax at night in bedrooms. Acoustically attenuated passive or mechanical ventilation should be installed as necessary. The location, design and internal layout of residential accommodation should ensure that living areas are located away from primary noise sources. Buildings should also be laid out so that alike rooms are above each other (i.e. bedrooms over bedrooms) and avoid stairs / common parts next to noise sensitive rooms.

12.98 Developments should be constructed so that the impact of vibration from existing road, rail and industrial / commercial premises (e.g. gyms) falls into the category of ‘Low Probability of adverse comment’ as defined in BS6472. Private and communal gardens should be designed where practicable so that the steady noise level does not exceed the upper limit as cited in BS8233.
Noise and Vibration

**Industrial and Commercial Noise Standards**

12•99 All developments and/or associated plant should be designed to ensure the existing ambient background noise levels at the nearest noise sensitive premises are not increased (i.e. that the rated level is at least 10dB (A) below the measured background level). Assessment shall be in accordance with the detailed requirements of the RBKC Noise SPD in both boroughs.

12•100 Commercial servicing areas should be located away from residential areas and/or enclosed where possible. Delivery, goods handling operations and collection times will need approval as part of a servicing management plan to be secured by condition of planning permission. Noise from these activities shall be assessed as per section 6.3 of the RBKC Noise SPD in both boroughs.

**Entertainment Noise Standards**

12•101 Any development that provides music or entertainment (e.g. restaurants, pubs, clubs, and retail outlets) must be designed and constructed to ensure that the activities are inaudible at any noise sensitive premises, especially residential premises. Noise from these uses shall be assessed as per chapter 8.0 of the RBKC Noise SPD in both boroughs.

**School Noise Standards**

12•102 New educational facilities or improvements to existing facilities should be done so in accordance with Part E of the Building Regulations 2003 and Building Bulletin 93: Acoustic Design for Schools.
Ecology and Biodiversity

Context
12•103 Ecology and biodiversity within the OA is predominantly found in a semi-natural green corridor running along the West London Line. There are two Sites of Nature Conservation Importance (SNCI) within this corridor (both Borough Grade I), and a further 12 SNCI’s within 1km of the OA (all Local) including Brompton Cemetery. The ‘Earl’s Court and West Kensington OA – Ecological Aspirations report’, which supports this SPD, sets out details on the ecological value of these SNCIs, including details of species found within 1km of the OA.

Policy Context
12•104 The Mayor’s London Plan (2011):
• ‘Urban Greening’ (Policy 5.10),
• ‘Green Roofs and Development Site Environs’ (Policy 5.11), and
• ‘Biodiversity and Access to Nature’ (Policy 7.19).

12•105 LBHF’s Core Strategy (2011):
• ‘Improving and Protecting Parks and Open Spaces’ (Policy OS1).

12•106 RBKC’s Core Strategy (2010):
• ‘Earl’s Court’ (Policy CP10 and associated Vision); and
• ‘Biodiversity’ (Policy CE4).


12•108 London Biodiversity Action Plan.


12•110 LBHF Parks Strategy.

12•111 Paragraphs 98 and 99 of Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 also provides information on Biodiversity Action Plans and the consideration of protected species in the planning system. Natural England has also produced guidance on likely impacts of development proposals on protected species.
Ecology and Biodiversity

Protect and Enhance Ecology and Biodiversity

**Key Principle ENV18:**
Development will be expected to protect and enhance ecology and biodiversity within and adjacent to the OA with no net loss of species or habitat by:

- Protecting and enhancing the Sites of Nature Conservation Importance (SNCI) adjacent to the northbound West London Line platform at West Brompton Station;
- Replacing other Sites of Nature Conservation Importance to a significantly higher standard within the OA;
- Ensuring that there is no net loss (in area) of Sites of Nature Conservation Importance;
- Creating further habitats through the provision of open space, landscaping and tree planting focussing on priority native habitats suitable to the area (acid grassland, woodland and freshwater habitats);
- Ensuring that all green open space is connected to form a network of green spaces, with a focus on north-south connectivity;
- Delivering Sustainable Urban Drainage systems in the form of swales, rain gardens, ponds and surface drainage systems to provide habitat diversity;
- Requiring, where feasible, for all buildings to include green and brown roofs, together with some green walls, to encourage biodiversity habitats, facilitate migration, improve insulation, reduce the impact of the urban heat island effect, help regulate building temperatures and attenuate stormwater flows;
- Minimising light pollution to areas sensitive to bats and other wildlife.

**Key Principle ENV19:**
Major planning applications in the OA must be accompanied by an Ecological Impact Assessment, including an ecological survey and ecological enhancement strategy. An ecological management plan will also be required through any Section 106 agreement.

12•112 Owing to its important habitat and SNCI designation, development will need to protect the ecological habitat immediately to the west of the West London Line northbound platform. This area is managed by the Local Agenda 21 Forum in partnership with Network Rail. If access to West Brompton Station is improved, proposals will need to be designed to incorporate this ecological feature. It contains a natural pond with water flowing from the exposed river gravels sitting on clay, which have allowed for a luxuriant growth of great reedmace (Typha latifolia), with smaller amounts of water plantain (Alisma plantago-aquatica) and floating sweet-grass (Glyceria fluitans). Also found in the area are Ranunculus lingua and Scrophularia auriculata, which are not found elsewhere in LBHF. There have also been sightings of Buffo buflo (the common toad) and Acheta domesticus (the common cricket) and has an extensive habitat for Lucanus Cervus (stag beetles). This area was botanically surveyed by LBHF biodiversity officers in June 2010 when 99 native vascular plants were identified on one day.

12•113 The OA contains some valuable areas for ecology and biodiversity, especially along the railway lines. However, an important component of this framework is that development improves east-west connectivity by decking over the railway lines. The proposed decking over the West London Line and District Line provides publicly accessible green open space in the form of a linear park. The nature of this linear park, and open space in general, is set out in the Urban Form Strategy (Chapter 4). It is imperative that in addition to the space to be provided for recreational purposes in the linear park, additional space is provided to accommodate the reprovision of SNCIs affected by decking over the railway lines. In order to justify the potential disruption and relocation, the new ecological and biodiversity areas must provide significantly better habitats than currently exist in the OA and these must be provided on-site.
Ecology and Biodiversity

12•114 In addition to this, other elements of the development must be designed to improve the ecology and biodiversity value of the OA, and protect SNCIs adjoining the OA, such as through the provision of native species of street trees, landscaping, green and brown roofs/walls and Sustainable Urban Drainage systems (swales and open water courses). The OA is also well located to attract protected species such as Great Crested Newts and bats roosting in trees or under old arches and measures to encourage these species should be considered. Significant piles of dead wood from large logs may also be ideal habitat for Lucanus cervus (the stag beetle).

12•115 Major planning applications in the OA must be accompanied by an Ecological Impact Assessment, including consideration of the impact of development on adjoining SNCI and an ecological enhancement strategy. An ecological management plan will be secured through any Section 106 agreement. These documents will need to reflect LBHF (Draft), RBKC and London Biodiversity Action Plans (BAPs), which identify local habitats that are important in both boroughs and the borough’s strategy to improve ecology and biodiversity.
Figure 12.9: The vegetation and semi-natural refuge that runs alongside the West London and District Lines
13 PHASING & SECTION 106 STRATEGY
Overview

13•1 This chapter identifies the planning obligations that would need to be secured and the phases at which these should be delivered, where known, in order that any redevelopment proposals would deliver the Key Objectives and Key Principles that have been identified within the individual topic based chapters of this SPD. The list is not exhaustive but would form a starting point for negotiations and priority setting by the authorities.

13•2 The authorities will ensure that the development is carried out and delivered in accordance with the relevant London Plan and Core Strategy policies and insofar as may be appropriate, taking into account other material considerations, the Key Objectives and Key Principles of this SPD, which have been drafted with the need for flexibility in mind such that they can be applied to any application coming forward in the OA.

13•3 In order to achieve this, the council will require the following:

1: the appropriate contributions (either in kind or financial);

2: the appropriate mitigation measures to address any attendant impacts of the proposals; and

3: the relevant contribution or mitigation measures, secured within the relevant phase of the development.

Key Objectives

• Ensure a comprehensive approach to redevelopment of the OA; and

• Ensure that the appropriate mix of land uses and infrastructure are delivered within the relevant phase(s) in order to support the needs of development.
Policy Context

13.4 The Mayor’s London Plan (2011)
- ‘Annex One’ (Opportunity and Intensification Areas);
- ‘Planning Obligations’ (Policy 8.2); and
- ‘Community Infrastructure Levy’ (Policy 8.3).

13.5 LBHF’s Core Strategy (2011)
- ‘Strategic Site and Housing Regeneration Area - FRA 1’; and
- ‘Delivery and Monitoring’.

13.6 RBKC’s Core Strategy (2010)
- ‘Earls Court’ (Policy CP10 and associated Vision);
- ‘Earl’s Court Exhibition Centre’ (Policy CA7); and
- ‘Infrastructure Delivery and Planning Obligations’ (Policy C1).

Mayoral Community Infrastructure Levy

13.7 The Mayor has prepared draft proposals for a levy on development proposals within Greater London in order to fund infrastructure requirements including Crossrail. The levy comes into effect on 1st April 2012 and will be a material consideration when determining planning applications.

Key Principles

Key Principle PS1:
Planning obligations will be secured to ensure the delivery of a comprehensive and acceptable phased approach to any redevelopment of the OA.

13.8 The authorities will require a comprehensive approach to redevelopment of the OA. This reflects the requirements of the site specific policies in the Mayor’s London Plan (2011), LBHF’s Core Strategy (2011) and RBKC’s Core Strategy (2010). The use of appropriate planning obligations will be sought to ensure the delivery of a comprehensive and acceptable phased approach to any redevelopment in order that the Phasing and Section 106 Strategy Key Objectives can be met.
Key Principles

Key Principle PS2: Any application for the comprehensive redevelopment of the OA should include a phasing strategy which would need to demonstrate that the proposed redevelopment together with reprovision of the existing housing would be carried out with the minimum disruption to existing residents.

13.9 This strategy would need to demonstrate that the proposals would achieve an orderly and satisfactory development of the site and would need to set out how the appropriate land uses and infrastructure requirements are included at each relevant phase.

Key Principle PS3: Any planning agreement would need to ensure that each phase of development is self-sufficient in terms of its planning contributions towards environmental improvements, infrastructure and land uses.

13.12 Any planning agreement needs to be structured in such a way so that were development to stop, the authorities would have secured the necessary contributions in order to deliver the infrastructure and land uses directly required for the needs of the development at the time. The authorities will also look to secure the provision of temporary facilities where relevant. In some circumstances, the authorities will expect the infrastructure or land use to increase incrementally with development. This is particularly true of publicly accessible open space, play space (UF17) and affordable housing (HO9) and any planning agreement would need to tie down the delivery of these.

Key Principle PS4: Any planning agreement would need to include triggers requiring the delivery of/contributions towards necessary infrastructure to coincide with development/occupation. It should also include contingency plans should the comprehensive redevelopment of the OA not be completed as envisaged at the time any planning permission is granted.

13.10 It is important that the OA is provided with the necessary infrastructure and land uses to support the needs of the new community. If delivered too early, these facilities are likely to be underused and therefore waste public and private assets. If delivered too late, the existing facilities in the vicinity of the OA could have an undue burden placed on them, hindering their ability to operate. The authorities will therefore require any planning agreement to include a number of triggers which ensure that infrastructure and land uses are delivered at the right time in order to support the growing needs of the population.

13.11 Contingency plans may be required for the delivery of infrastructure and land uses where relevant. The authorities for example, consider east-west connectivity across the OA to be key to the wider delivery of comprehensive redevelopment and will therefore look to secure its delivery as early as possible (see para 4.15). The authorities may therefore require a contingency plan to be put in place to ensure the delivery of an east-west route through the OA should comprehensive redevelopment of the OA not proceed in the way envisaged in the Phasing Strategy required in Key Principle PS2.
Urban Form Strategy

Key Objectives

- Maximise connectivity;
- Establish an urban grain within the OA that is inspired by the surrounding pattern of streets and open spaces;
- Provide good quality public open space that offers a range of recreational and ecological opportunities and overcomes existing deficiencies in access to public open space and play facilities;
- Ensure that new buildings on the edges of the OA are sensitively integrated into and enhance the existing context;
- Ensure that no new buildings visible on the skyline have a negative impact on the quality and character of the surrounding townscape; and
- Design well proportioned streets that respond to those in the surrounding area and encourage walking and cycling.

List of planning obligations arising from the SPD:

13.1 Public Open Space;

- public open space (including a contiguous park of 2 hectares), delivered incrementally on a phased basis attendant to the increase in the living and working populations (Key Principle UF12); and
- equipped play facilities that meet the locational standards set out in the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation (2008) and that are of a size that adequately caters for children in their catchments (Key Principle UF16).

Figures 13.1 to 13.6: Precedent images for open spaces
**Housing Strategy**

**Key Objective**
Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

**List of planning obligations arising from the SPD:**

13•14 **Estate Regeneration:**
- any development proposals involving the regeneration of the West Kensington and Gibbs Green estates to ensure that they would not result in the net loss of any affordable housing both in terms of floorspace and numbers of units (Key Principle H02);
- any affordable housing provided to facilitate the reprovision of housing for the residents of the estates to demonstrate that it would address the housing needs in the individual phases of the development (Key Principle H03);
- the social rented housing provision on the Seagrave Road car park site to provide a mix which would facilitate the reprovision of housing for an identified proportion of the residents of the estates (Key Principle H04); and
- a Phasing Strategy which demonstrates minimal disruption to existing residents when redeveloping the OA (Key Principles H05 and PS2).

13•15 **Tenure Mix:**
- the appropriate levels and mix of affordable housing in LBHF (Key Principle H06) and RBKC (Key Principle H07); and
- measures to control the affordability and management of affordable housing within the OA (Key Principles H010 and H011).

**Figure 13.7: Photograph of a new housing development at River Gauche, Paris. Photograph by Urban Exposure**

**Employment Strategy**

**Key Objective**
Increase employment opportunities for local people, by creating a minimum of 7,000 new jobs and improving access to training initiatives and apprenticeships.

**List of planning obligations arising from the SPD:**

13•16 **Business Provision:**
- affordable business space suitable for very small, small and medium sized enterprises and incubator units (Key Principle ES5).

13•17 **Employment and Training:**
- contributions towards sector specific support for business affected by the closure of the Earl’s Court Exhibition Centres (Key Principle ES6);
- procedures and financial contributions towards cost of facilitating local procurement (Key Principle ES7);
- support and funding of Workplace Coordinators to ensure local people benefit from employment opportunities (Key Principle ES8);
- a Construction Training Centre to be provided pre and during construction (Key Principle ES8);
- provision of a Recruitment and Job Shop (Key Principle ES8);
- a Local Labour, Skills and Employment Strategy (Key Principle ES9); and
- a Local Labour, Skills and Employment Delivery Plan (Key Principle ES9).
Retail Strategy

Key Objectives

- New ‘comparison’ retail demand from the new residents should be met in existing town centres - Fulham, Hammersmith, Shepherd’s Bush, Kensington High Street and King’s Road. In Fulham Town Centre there is an additional opportunity that should be taken to extend the town centre north along North End Road; and

- Retail to meet the day to day needs of the new resident and worker population, in addition to the extended Fulham Town Centre, should be clustered around underground stations and in a new local centre within the OA which will also complement the new cultural and visitor facilities.

List of planning obligations arising from the SPD:

13•18 Retail Controls:

- a Retail Management Plan which controls issues such as phasing, size of retail units, convenience/comparison split by floorspace, limitations on other retail related uses (A Classes), range and number of independent shops, prohibition on mezzanine floors and active frontages (Key Principle RS5);
- affordable shops (Key Principle RS7); and
- the allocation of land, with a North End Road address, for the potential relocation of North End Road street market (Key Principle RS8).

Culture Strategy

Key Objectives

- Explore the potential for a strategic leisure, cultural and visitor attraction in accordance with the Mayor’s London Plan; and

- Create a lively cultural destination with a variety of culture, arts and creative facilities that continues the Earl’s Court ‘brand’.

List of planning obligations arising from the SPD:

13•19 A New Cultural Destination:

- cultural facilities, including affordable workshop/studio space, to be provided within early development phases (Key Principles CS1, CS2 and CS3);
- contributions towards the enhancement of Brompton Cemetery (Key Principle CS1); and
- affordable artists studios (Key Principle CS3).

13•20 Public Art:

- public art (Key Principle CS5).
Chapter 13 | Phasing & Section 106 Strategy

Social & Community Facilities

**Key Objective**
Provide social and community facilities to meet the needs of the new residential and worker population at each phase.

List of planning obligations arising from the SPD:

13•21 Education:
- contributions (in kind and financial) towards the relevant nursery, primary and secondary education provision. The primary and secondary school should be co-located and provided within the early phases of development (*Key Principle SC1*).

13•22 Health:
- a health facility, to be provided within early development phases (*Key Principle SC2*); and
- financial contributions towards health provision (*RBKC Core Strategy Policies CA7 and C1*).

13•23 Sports and Leisure:
- affordable sports and leisure provision (*Key Principle SC4*).

13•24 Police Facilities:
- a community policing facility and financial contributions towards staffing the facility (*Key Principle SC6*); and
- financial contributions towards CCTV and expanding capacity in the boroughs’ CCTV control centres (*Key Principle SC6*).

13•25 Community Space:
- a community hub to be provided within early development phases (*Key Principle SC7*); and
- social and community floorspace in the Earl’s Court Strategic Site (*RBKC Core Strategy Policies CA7 and C1*).

Figures 13.9 and 13.10: Photographs by Dave Morris
Transport & Accessibility Strategy

**Key Objectives**

- Maximise the number of trips by walking and cycling, ensure excellent access to and increased capacity on public transport as well as managing the demand for freight and deliveries whilst minimising unessential motorised travel to mitigate traffic impacts and congestion on the road network;
- Ensure interventions are put in place to accommodate increased travel demand from development and that these interventions do not have any unacceptable impact on the transport network or wider environment; and
- Ensure a holistic approach is taken to walking, cycling and public transport that delivers a high quality public realm and improves local connectivity.

13.26 It should be noted that redevelopment within the OA is likely to be delivered in phases over a period of many years. The delivery of development will need to be coordinated with capacity improvements to public transport and the road network. Development proposals must be supported by a robust Transport Assessment that sets out clearly demand by phase, including construction traffic, and sets that against the available transport capacity. A series of interim assessments of impact will need to be made so that the cumulative impacts of development phases are understood and to ensure that development is brought forward only when sufficient transport improvements are in place to accommodate it. The delivery of development will need to be controlled via planning obligations to ensure that development is only implemented once appropriate transport improvements are in place.

13.27 Any changes to the road network, London Underground and Network Rail facilities and London Buses are subject to detailed design and operational agreement by the relevant organisations.

**List of planning obligations arising from the SPD:**

13.28 **Walking and Cycling:**

- all streets to be built to adoptable standards and offered for adoption to the relevant Highway Authority (Key Principle TRN3);
- a comprehensive wayfinding strategy in line with TfL’s Legible London standards (Key Principle TRN5);
- significant streetscape and footway capacity improvements on the roads surrounding the OA— in particular North End Road, Warwick Road, Old Brompton Road / Lillie Road, West Cromwell Road (A4 improvement scheme) and Earl’s Court Road (Key Principle TRN6);
- improved pedestrian crossings on Lillie Road at West Brompton station, on Warwick Road at Earl’s Court station, at West Cromwell Road’s junctions with North End Road and Warwick Road and any potential crossing at the proposed new A4 junction (Key Principle TRN7);
- new pedestrian and cycle connections north under the A4 West Cromwell Road and south under Lillie Road, if required following investigation as part of the Transport Assessment(s) (Key Principle TRN7 and TRN8);
- improved east west cycle connectivity and linkages into the OA as identified within Transport Assessment(s) (Key Principle TRN8);
- cycle parking in the OA, on the surrounding streets and at all local stations (Key Principle TRN9); and
- an extension of the Mayor’s cycle hire scheme into the OA (Key Principle TRN9).
Transport & Accessibility Strategy

13.29 Public Transport:
- reopening of the pedestrian tunnel under Warwick Road, including step-free access and/or increases to gateline capacity at the Warwick Road entrance to Earl’s Court Station (Key Principle TRN12);
- a new station entrance to the eastern end of West Kensington Station, including step-free access and/or increased gateline capacity at the current entrance (Key Principles TRN13 and TRN14);
- improved gateline capacity at West Brompton Station (Key Principle TRN 13);
- increased concourse space at West Brompton Station (Key Principle TRN13);
- implementation of improvements to stairways at West Brompton Station, subject to investigation of feasibility and heritage concerns (Key Principle TRN13);
- step-free access to all platforms at West Kensington Station (Key Principle TRN 14);
- step-free access to the south-bound District Line platform at West Brompton station (Key Principle TRN 14);
- platform lengthening at West Brompton Station to allow for eight car trains, including any associated station improvements to ensure sufficient capacity to accommodate any additional passengers (Key Principle TRN15);
- improvements to the public realm and interchange facilities at each of the three local stations (Key Principle TRN16);
- measures to provide increased bus capacity including provision of bus route enhancements (Key Principle TRN17);
- improvements to bus stops and other facilities, including re-provision of bus stands (Key Principle TRN17); and
- taxi ranks and coach parking and drop off facilities (Key Principle TRN18).

13.30 Road Network, Car Parking and Freight:
- north-south connectivity through the OA to provide extra road capacity (Key Principle TRN19);
- a new access onto the A4 West Cromwell Road (Key Principle TRN19);
- a study to identify and then funding to implement any necessary signal changes on the surrounding road network (Key Principle TRN19);
- reconfiguration of the North End Road and Lillie Road junction and the provision of alternative routes through the site to relieve traffic congestion (Key Principle TRN19);
- other new site accesses, as agreed with the Highway Authorities (Key Principle TRN19);
- a review of local traffic management arrangements and mitigations where appropriate to address ‘rat running’ issues (Key Principle TRN21);
- investigation of improvements to the Earl’s Court One Way System, including to the pedestrian environment, and funding of identified measures (Key Principle TRN 22);
- car club bays (Key Principle TRN24);
- electric vehicle charging points (Key Principle TRN24);
- Travel Plans for all uses (Key Principle TRN24);
- all new residential units to be Permit-free (Key Principle TRN25);
- on-street parking an a review of existing CPZs and mitigations, including extension or amendments to existing zones or new zones (Key Principle TRN25);
- consolidated local delivery and servicing centres for freight and domestic deliveries (Key Principle TRN26);
- a rail freight transfer facility for construction materials and spoil removal subject to feasibility analysis as part of the Transport Assessments (Key Principle TRN26);
- Delivery and Servicing Plans (Key Principle TRN26); and
- Construction Logistics Plans for each relevant phase of development (Key Principle TRN26).
Energy Strategy

Key Objectives
- All residential buildings from 2016 and all non-domestic buildings from 2019 must be zero carbon; and
- All buildings must reduce carbon dioxide emissions in accordance with the energy hierarchy of using less energy, supplying energy efficiently and using renewable energy.

Environmental Strategy

Key Objectives
- Protect the new and existing population from the impacts of demolition, excavation and construction and sustainably remediate contaminated land;
- Require development to reduce flood risk and achieve sustainable water management, including sustainable urban drainage;
- Minimise waste generation, including demolition and construction waste, in accordance with the waste hierarchy;
- Ensure that the environmental impacts of air pollution and noise and vibration are adequately controlled and minimised; and
- Require development to protect and enhance ecology and biodiversity, including the protection of the ecological area adjacent to West Brompton Station.

List of planning obligations arising from the SPD:

13•31 Supplying Energy Efficiently:
- decentralised energy (including associated heat network), associated energy centres and infrastructure, including the provision of an energy centre in the first phase of the development (Key Principle ENE2).

13•32 Demolition, Excavation and Construction Impacts:
- construction, demolition and excavation logistics plans (Key Principle ENV2).

13•33 Waste Management:
- at least one centralised waste management facility (Key Principle ENV8); and
- a Site Waste Management Plan prepared in accordance with Defra Guidance (Key Principle ENV11).

13•34 Ecology and Biodiversity:
- an ecological management plan (Key Principle ENV19).

List of planning obligations arising from the SPD:

Figure 13.12: Site of Nature Conservation Importance, viewed from Seagrave Road car park.
Earl’s Court and West Kensington Opportunity Area Joint Supplementary Planning Document

POLICY CONTEXT APPENDIX
Policy context

A•1 This appendix sets out the regional (London wide) and local policy context specific to the OA.

A•2 In addition to these OA specific planning policies, there are also theme based national, regional and local planning policies which apply to any redevelopment of the OA. The Mayor of London has other theme based Supplementary Planning Guidance (such as the The London Plan Housing SPG (2005), the Interim Housing SPG (2010) and the Housing SPG EiP draft (2010)) and both boroughs also have theme based Supplementary Planning Documents (such as Noise / Air Quality SPDs in RBKC) which also apply to redevelopment of the OA.

Regional Policy

The Mayor's London Plan July 2011

A•3 Table A1.1 in Annex 1 of the London Plan (2011) identifies Earl’s Court and West Kensington as an Opportunity Area to deliver the following:

<table>
<thead>
<tr>
<th>Ref</th>
<th>Location</th>
<th>Area (ha)</th>
<th>Indicative employment capacity</th>
<th>Minimum new homes</th>
<th>OAPF Progress</th>
<th>Strategic policy directions</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Earl’s Court and West Kensington</td>
<td>36</td>
<td>7,000</td>
<td>4,000</td>
<td>2</td>
<td>The Area presents a significant opportunity for regeneration comprising estate renewal and housing and employment growth. A comprehensive approach should be taken to planning the future of the exhibition complex, the Transport for London Lillie Bridge Road depot, the local authority housing estates and other sites in the vicinity. 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. The Mayor is working with the boroughs and landowners to develop a planning framework for the area. This, informed by a transport study, will determine the optimum development capacity for the area which is likely to be significantly higher than the minimum figures shown here. Earl’s Court has good public transport facilities and these should be further enhanced, together with comprehensive highway and streetscape improvements. Earl’s Court already benefits from a strong identity, distinctive townscape and a range of heritage assets, all of which should be upheld and promoted through the regeneration and growth of the area.</td>
</tr>
</tbody>
</table>

Figure A.1: Identification of the OA as set out in Table A1.1 in Annex 1 of the London Plan (July 2011)
Regional Policy

Policy 2.13 of the Mayor’s London Plan (2011) sets out the Mayor’s role in relation to Opportunity Areas, what development proposals within Opportunity Areas should achieve and what local authorities should produce in their LDFs.

**POLICY 2.13**

**OPPORTUNITY AREAS AND INTENSIFICATION AREAS**

**Strategic**

A  Within the opportunity and intensification areas shown in Map 2.4 [of the London Plan], the Mayor will:

a) provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realize these areas’ growth potential in the terms of Annex 1, recognising that there are different models for carrying these forward; or

b) build on frameworks already developed; and

c) ensure that his agencies (including Transport for London) work collaboratively and with others to identify those opportunity and intensification areas that require public investment and intervention to achieve their growth potential.

d) encourage boroughs to progress and implement planning frameworks to realise the potential of intensification areas in the terms of Annex 1, and will provide strategic support where necessary.

**Planning decisions**

B  Development proposals within opportunity areas and intensification areas should:

a) support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks

b) seek to optimize residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses

c) contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks

d) realize scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail, making better use of existing infrastructure and promote inclusive access including cycling and walking

e) support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.

**LDF preparation**

C  Within LDFs boroughs should develop more detailed policies and proposals for opportunity areas and intensification areas.
Local Policy

LBHF Core Strategy (2011)

A.5 LBHF’s Core Strategy Strategic Site and Housing Estate Regeneration Area – FRA 1 sets out LBHF’s strategic policy in relation to the part of the OA in LBHF.

Earl’s Court West Kensington Opportunity Area strategic site and housing regeneration area (Earl’s Court Exhibition Centre 2 and Seagrave Road car park, Lillie Bridge Depot, West Kensington and Gibbs Green states, and adjacent land).

<table>
<thead>
<tr>
<th>Earl’s Court and West Kensington Opportunity Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicative minimum homes</td>
</tr>
<tr>
<td>1,500 in H+F</td>
</tr>
<tr>
<td>2,000 in H+F and RBKC</td>
</tr>
</tbody>
</table>

Owner: Private, TfL, Network Rail, Council, RSL and private owners. The Earl’s Court & West Kensington Opportunity Area covers development sites within both the London Borough of Hammersmith & Fulham and the Royal Borough of Kensington & Chelsea.

There should be a phased comprehensive mixed use residential led masterplan for the Opportunity Area that provides housing, employment, hotels, leisure, offices and associated facilities, including retail to cater for day to day needs and cultural facilities. This should include a major arts, leisure or entertainment activity that will be major visitor attractor and create significant new employment opportunities. New local educational, health and community facilities, and new public and private open space should be provided.

Regeneration of the West Kensington, Gibbs Green and Registered Provider estates phased over up to 20 years will be considered as part of the comprehensive approach to the opportunity area. All existing local residents should have the opportunity to be rehoused within the opportunity area or within its vicinity if proposals affect their homes.

There should be a substantial overall net increase in housing. 40% of all new housing in the opportunity area(within H&F) should be affordable in accordance with Policy H2 Affordability. With any proposals to replace existing social rented housing, the existing quantity should not be reduced but it should be redistributed across the opportunity area. Overall, new residential should have a mix of tenures, dwelling sizes and types, including family housing; and be provided in densities and layouts that are compatible with high quality living environments for a mixed and balanced community.

The part of the area north of Lillie Road should be designed as a vibrant world class new quarter in inner West London linking well with its physical and commercial surroundings, especially to the west and east. If the TfL depot has to remain it should be decked over provided that achieves planning benefits and is viable within an acceptable scheme. Building design should be of the highest quality. There may be some scope for tall buildings no higher than, and close to, the existing Empress State building, however, any tall buildings would need to be justified by a full urban design analysis.
The Seagrave Road car park must be considered as part of the comprehensive approach to the opportunity area. It should be primarily for residential purposes with supporting facilities, including public open space. Other employment based uses may be appropriate as part of a comprehensive development scheme for the site. The feasibility to provide direct access from Seagrave Road and the site as whole to West Brompton station should be considered. Development proposals for Seagrave Road should provide for the opportunity to deliver approximately 25% of all housing as social rented housing subject to estate regeneration coming forward, detailed analysis and viability. This will provide opportunities for tenants on local housing estates to be re-housed into better accommodation and to facilitate regeneration on those estates.

Overall, the design, layout, massing and density of development must take account of and respect the local context and setting, local conservation areas, and local views. However, development should also recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. For the Seagrave Road site, the design must also take account of views from the Listed Brompton Cemetery, and local nature conservation.

On site street patterns and connections must be designed with regard to improving traffic, pedestrian and cycling circulation in the surrounding area and on primary routes in Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea. Development must improve pedestrian connections from the sites and the surrounding area to public transport facilities, particularly Earl's Court.

The acceptable overall quantity of development will depend on a range of factors, especially urban design considerations, the provision of satisfactory residential standards and environmental conditions, and evidence to support non-residential uses; and, in addition, it must not exceed what is compatible with a transport capacity and the identification of deliverable improvements in the transport infrastructure. Development must also take account of the capacity of the physical infrastructure, particularly for sewerage and surface water. Any development proposals will need to address the flood risk potential as the site lies in a High/Medium Residual Risk area.

All development must incorporate high levels of environmental performance by the use of low and zero carbon technologies, including combined heat and power, the establishment of a decentralized energy network and the installation of renewable energy systems.

Development must have regard to guidance set out in the Earls Court/West Kensington Opportunity Area Supplementary Planning Document.
Local Policy

RBKC Core Strategy (2010)

A.6  The part of the OA within RBKC falls within the Earl’s Court Exhibition Centre Strategic Site, which is identified within Policy CA7 (Chapter 26) of RBKC’s Core Strategy (2010).

Policy CA 7

Earl’s Court Exhibition Centre

Allocation for Earl’s Court Exhibition Centre

The Council allocates development on the site to deliver, in terms of:-

Land use allocation:

a. a minimum of 500 homes within the Royal Borough, which could be increased, in particular if (b) to (e) below are provided within LBHF as part of the masterplanning process conducted in the preparation of the SPD;
b. a minimum of 10,000m2 (108,000 ft²) of office floor space;
c. retail and other uses within the A Class of the Use Classes Order 1987 (as amended) to serve the day-to-day needs of the new development;
d. a significant cultural facility to retain Earl’s Court’s long standing brand as an important cultural destination, located on the area of the Opportunity Area nearest to public transport accessibility;
e. other non-residential uses required to deliver a sustainable and balanced mixed-use development, such as hotel and leisure uses;
f. social and community uses;
g. on-site waste management facilities to handle waste arising from the new uses of the site (including recycling facilities and/or anaerobic digestion), which may be provided within LBHF as part of the masterplanning process conducted in the preparation of the SPD but must benefit development in the Royal Borough;
h. low or carbon neutral developments and a 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, which may be provided within LBHF as part of the masterplanning process conducted in the preparation of the SPD but must benefit development in the Royal Borough;
Local Policy

**Principles:**

i. a new urban quarter which links well with its surroundings, especially to the west and east;

j. a design of the road network and connections with the surrounding area that significantly improves residential amenity, the pedestrian environment and public transport access in the area of the one-way system, and does not have an unacceptable impact on traffic congestion;

k. an open urban square, fronting onto Warwick Road, with land uses that provide positive active edges to the building frontages

**Infrastructure and Planning Obligations:**

l. social and community facilities;

m. additional new public open space, including considering opportunities to create biodiversity;

n. securing highway contributions including the investigation, in consultation with TfL and the Boroughs, into returning the Earl's Court one-way system two way working; implementation of those measures identified during the investigation commensurate to the development proposal; and significant improvements to quality of residential amenity, the pedestrian environment and public transport access in the area of the Earl's Court one-way system;

o. improvements to tube, bus and rail access, including interchange from the West London Line to the underground network and the extension of bus services into the site;

p. improved pedestrian links from and through the site and the surrounding area to public transport facilities and improved cycle links to enhance north/south cycle accessibility;

q. affordable housing as part of residential requirement;

r. educational facilities;

s. other contributions as identified in the Planning Obligations Supplementary Planning Document and site specific Supplementary Planning Document.