

**WRITTEN STATEMENT**  
**OF**  
**CAPITAL & COUNTIES**  
**ON BEHALF OF**  
**EARLS COURT & OLYMPIA GROUP**

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**Introduction**

1. This Written Statement is submitted by Capital & Counties (C&C) on behalf of Earls Court & Olympia Group (EC&O Group) with regard to the Earls Court Strategic Site which forms part of the Earls Court Regeneration Area and Earls Court and West Kensington Opportunity Area. It follows representations by C&C submitted at the following stages of the Core Strategy:
  - i) Core Strategy Issues and Options – representations submitted in April 2008
  - ii) Core Strategy “Towards Preferred Options” – representations submitted in October 2008
  - iii) Places and Strategic Sites – representations submitted in June 2009
  - iv) Draft Core Strategy – representations submitted in September 2009
  - v) Proposed Submission Core Strategy – representations submitted in December 2009
  
2. As explained in the representations, the Earls Court Regeneration Area is a significant brownfield development opportunity located in the London Borough of Hammersmith & Fulham (LBHF) and the Royal Borough of Kensington & Chelsea (RBKC). The Earls Court Regeneration Area comprises the Earls Court Exhibition Centre which is owned by EC&O Group, the Lillie Road Depot owned by Transport for London (TfL), and the West Kensington and Gibbs Green housing estates owned by LBHF. The combined holdings total 28 hectares and constitute the majority of the Earls Court & West Kensington Opportunity Area which has been newly designated in the Draft Replacement London Plan (DRLP). The portion of the Earls Court Regeneration Area within RBKC (7 hectares) comprises the Earls Court Strategic Site identified in the Submission Core Strategy. This Written Statement relates to the Earls Court Strategic Site and should be considered in the context of the wider Earls Court Regeneration Area and the Earls Court and West Kensington Opportunity Area.
  
3. This Written Statement addresses Matter 8 – Better Travel Choices and is consistent with representations previously submitted by C&C. RBKC has incorporated some changes in response to C&C’s reps as the Core Strategy has evolved. However the document as it stands requires further amendment in respect of “Better Travel Choices” to ensure it is sound and, in particular, to ensure it provides an effective basis for development proposals to come forward at the Earls Court Strategic Site.

4. The representations promote the large scale development potential of the Earls Court Regeneration Area and the Earls Court and West Kensington Opportunity Area. They are supported by a suite of evidence base documents which analyse the potential for the Earls Court Regeneration Area and the Earls Court and West Kensington Opportunity Area in relation to different topic areas.

***Question 4 – Any other relevant matters***

**C&C propose that the following question is covered under ‘any other relevant matters’:**

**Should the wording of Policy CT1 allow for the outcome of the investigations of the Earls Court one way system not requiring the returning to two way working?**

5. There is no sound and credible evidence base to demonstrate that converting the Earls Court road system to two way working is achievable or would deliver the benefits sought. The GLA’s representations to earlier iterations of the Core Strategy refer to previous studies showing that “removal of the one-way system is highly problematic to achieve” and that TfL has “no plans at present to remove the one-way system and as such no funding has been identified for this”. RBKC’s response to these representations state that it is aware of the difficulty in unravelling the one way system, however there no evidence base put forward by RBKC to justify maintaining this approach as the most appropriate strategy when considered against reasonable alternatives.
6. The Statement of Common Ground between RBKC and LBHF (of 28<sup>th</sup> May 2010) sets out RBKC's most up to date position in relation to the possible returning of the one-way system to two-way working. It explains that policy does not necessarily require returning the Earls Court one-way system to two-way working, but requires only the implementation of those measures which have been identified as a result of investigation.
7. Although RBKC, in its Statement of Common Ground with LBHF, does not 'require' the returning of the one-way system to two-way working, it is of concern that RBKC does require the implementation of further measures as a result of investigation. Policy CT1 must not pre-empt the outcome of assessment and investigation work, particularly given that there is no evidence base to support the notion of changing the one-way system to two-way or even indicate that it is possible at this time. PPS12 requires the Core Strategy to consider alternative strategies. It may be that investigation work proves that the one way system can not be feasibly or practically returned to two-way working. Policy CT1 does not currently cater for this alternative scenario.
8. The change sought to Policy CT1 is as follows:

**Policy CT1**

The Council will ensure that there are better alternatives to car use by making it easier and more attractive to walk, cycle and use public transport and by managing traffic congestion

and the supply of car parking.

To deliver this the Council will:

n. work with TfL to improve the streets within the Earl's Court One-Way System by:

*i.* investigating the return of the streets to two-way operation, and by implementing the findings of this investigation **should it be deemed feasible and subject to necessary approvals**<sup>1</sup>.

9. The changes will enable the policy to be more effective and sound. It is important to note that C&C's proposed amendments would be in keeping with GLA and TfL representations to the Draft Core Strategy in June 2009 which explain that a proposal for two-way working of the one-way system is yet to be proven possible or even desirable (refer to Appendices 1 and 2).

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<sup>1</sup> To avoid confusion with the notation used for the RBKC recommended changes to the Submission Core Strategy the text changes sought by C&C are shown in bold italics underlined.

## Comments

### Strategic Sites (05/05/09 to 16/06/09)

Comment by	Transport for London (TfL) (Ms Hanna Shaw)
Comment ID	SSites77
Response Date	16/06/09 18:34
Consultation Point	8: Earl's Court ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.7

#### Please write your comments below

Page 22 of the 'Strategic Sites' document and pages 11 and 63 of the 'Places' document mention the borough's proposals to unravel the Earl's Court one way system. This proposal is yet to be proven possible or even desirable by TfL, and it should be noted that the one way system is TLRN. If this proposal remains, it would need to adhere to policy 3C.16 of the London Plan which requires a criteria based approach to road schemes, which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve. It would need to demonstrate that the removal of the one-way traffic system would improve conditions for all users, including for pedestrians, cyclists, disabled people, public transport and freight. It would need to specify who will deliver the road scheme, when it will be delivered, how it would be funded, and whether or not there is a reasonable prospect of provision within the lifetime of the plan in accordance with PPS12. This scheme is currently not in the TfL business plan and as such TfL require further detailed discussions on this issue.

#### Officer's response to submitted comments

Noted. If the proposal to unravel the One-Way-System remains, it will adhere to policy 3C.16 of the London Plan and meet the requirements of PPS12. A proper transport assessment will be undertaken and we will work in partnership with TfL. We will include a reference to partnership working with TfL in 5.2.1

## The Draft Core Strategy for the Royal Borough with a particular focus on North Kensington

Event Name	The Draft Core Strategy for the Royal Borough with a particular focus on North Kensington
Comment by	Greater London Authority (Mr Giles Dolphin)
Comment ID	CSNKplan(Draft)978
Response Date	15/09/09 14:56
Consultation Point	26.2.1 Paragraph ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.8
Comments	

### Please write your comments below

#### Earls Court London Plan Policy cross-ref: 3C.16

The Policy must make reference to TfL being the Highway Authority for the Earl's Court one-way system and that any proposal for the one-way system should be made in collaboration with TfL. Options for removing the Earl's Court one-way system have been studied previously. These studies showed that removal of the one-way system is highly problematic to achieve, largely due to the need to remove significant amounts of residents' parking. TfL has no plans at present to remove the one-way system and as such no funding has been identified for this.

This proposal would need to adhere to policy 3C.16 of the London Plan which requires a criteria based approach to road schemes, which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve. It would need to demonstrate that the removal of the one-way traffic system would improve conditions for all users. It would need to specify who will deliver the road scheme, when it will be delivered, how it would be funded, and whether or not there is a reasonable prospect of provision within the lifetime of the plan in accordance with PPS12.

The wording of this policy could be changed to: investigate with TfL the potential of returning the streets to two-way operation. Further comment on Earls Court is provided in the main Officer report.

### Officer's response to comments

#### Officer's response to submitted comments

Agreed. Reference to TfL being the Highway Authority for the Earl's Court One-Way system is already made in the "Better Travel Choices" chapter. The Council is aware of the difficulty to unravel the one-way system. The wording of the paragraph 26.2.4. will be changed to reflect this:

"The on-site road pattern and connections resulting from the redevelopment must be designed with regard to significantly improving traffic circulation in the surrounding area, and on primary routes in

the London Borough of Hammersmith and Fulham and the Royal Borough, such that it enables the delivery of the unravelling of the One Way System, for which initial feasibility work has already been undertaken."

**Officer's Recommendations**

**Officer's Recommendations**

Amend wording.