

The Royal Borough of Kensington & Chelsea  
Local Development Framework:  
Core Strategy Examination in Public

## **Transport for London's Position Statements on Matters 3, 5 and 6**

### **Transport for London's Position Statement on Matter 3 (Policies for Places: General) and Matter 6 (Strategic Sites Allocations: Earl's Court)**

- 1 This Position Statement sets out Transport for London's (TfL's) current position in response to two related questions raised by the Inspector under Matters 3 and 6.

**Matter 3, Question 5: The vision for Earl's Court includes returning the one-way system to two-way working but the Chapter advises that no funding is at present allocated. Should the Vision allow flexibility for an alternative scenario?**

**Matter 6, Question 3: The vision for Earl's Court includes returning the one-way system to two-way working as discussed under Matter 3 (item 5). Policy CA7(h) presupposes that this will be achieved, although an investigation involving TfL has not reached conclusions. Should CA7 include a more flexible approach acknowledging the lack of conclusion on two-way working and to reflect that of Policy CT1(n)?**

- 2 Concerning the Earl's Court one-way system, TfL's position remains unchanged since providing comments on the draft Submission version of the Core Strategy. As indicated in those comments, 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 is not involved in any current investigations to remove the one-way system and as such no funding has been identified for this.
- 3 Any such proposal would need to adhere to policy 3C.16 *Road scheme proposals* of the London Plan which requires a criteria-based approach to road schemes, allowing schemes to go ahead if overall congestion reduces, there is local economic benefit and conditions for pedestrians, cyclists and public transport improve. The proposal would need to demonstrate that the removal of the one-way traffic system would improve conditions for all users and would need to specify who will deliver the road scheme, when it will be delivered and how it would be funded.

- 4 TfL acknowledges that paragraph 32.46 (item 4) of the Submission document states “The transportation and Highways Department will work closely with TfL, who are the relevant Highway Authority for the Earl’s Court one-way system, to investigate and implement improvements to the street environment in the area...”. TfL also acknowledges the council’s commitment in Policy CT1n to “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, ii. by securing improvements to the pedestrian environment, iii requiring developments to contribute to objectives i and ii.”
- 5 While paragraphs 10.3.2 and 26.2.4 make clear that “no funding for this project” has been allocated by TfL, TfL considers that the wording of policy CA7 should be changed to make clear that the council’s current proposals for the Earl’s Court one-way system have not yet been tested, that no funding has been identified by TfL for removal of the one-way system and that the council will investigate with TfL (as Highway Authority) the potential for returning the streets to two-way operation. TfL also considers that Section 10.2 (Vision for Earl’s Court in 2028) and paragraph 10.3.2 could be improved in this respect to better reflect the uncertainty surrounding the council’s proposals for two-way working.
- 6 Earl’s Court and West Kensington has been designated as an Opportunity Area in policy 2.13 and Annex 1 of the Draft Replacement London Plan. Annex 1 refers to a transport study which should be part of the planning framework for the Opportunity Area on which the Mayor is working with the boroughs and landowners. This could potentially consider the borough’s proposals for two-way working recognising how challenging this would be as noted above.

## **Transport for London's Position Statement on Matter 5: Strategic Sites Allocations: Kensal Gasworks and Wornington Green**

- 1 This Position Statement sets out Transport for London's (TfL's) current position in response to three of the questions raised by the Inspector under Matter 5: Strategic Allocations: Kensal Gasworks and Wornington Green.

### **Question 1: In order for the Kensal Gasworks SSA to act as a catalyst for regeneration of the north of the borough a new Crossrail station is required but is not provided for by the Crossrail Act. How secure is delivery of the proposed Crossrail station?**

- 2 Concerning a Crossrail station at Kensal, TfL's position remains unchanged since providing comments on the draft Submission version of the Core Strategy. As indicated in those comments, the Crossrail route as defined under the Crossrail Act 2008 does not include provision for a Crossrail station at Kensal. The council proposes that the site could provide a turnback facility (as an alternative to the planned site at Paddington New Yard) with simultaneous use as a station. Crossrail sponsors have a responsibility to make sure that the project is delivered on time and on budget, and as such any decisions on the project must be taken on the basis of a proven business case, there being the necessary funding available from those proposing changes to the scheme and there being no affect on the services that Network Rail or Crossrail will run. These three key criteria were listed by the Mayor of London having visited the site on 03 December 2009; he understood the borough's desire to be added to the Crossrail route when the economic benefits are considered. In any event, for operational reasons a turnback facility would still be required at Westbourne Park (Paddington New Yard) even if one were provided at Kensal Green.
- 3 Furthermore, recent recommendations made by HS2 Ltd on High Speed Two (the proposed high speed railway from London to the Midlands and the North) may make a Crossrail station at Kensal even more unlikely. Having considered several potential sites for an interchange station, HS2 Ltd has recommended a Crossrail interchange station on railway land west of Paddington at Old Oak Common in West London (west of Kensal). This would enable the station to be developed on a site currently used for depots and sidings, substantially limiting its potential impacts on the local environment and communities. The site is also in an area of London identified as a priority for regeneration, to which the development of a new interchange station could make a major contribution.
- 4 From a construction perspective, HS2 Ltd advises that Old Oak Common is the only site in West London suitable for launching the tunnel boring machines needed to create the tunnels needed for High Speed Two to reach Euston. This substantially reduces the additional

cost of providing an interchange station on the site, as some of the major excavations will be needed whether a station is built or not.

- 5 An interchange station at Old Oak Common would provide good connections for passengers between High Speed Two, Crossrail, the Great Western Main Line and the Heathrow Express. It would have the potential to be served by up to 24 Crossrail services per hour giving passengers a fast, high frequency, high capacity service to key business destinations in the West End, the City and Docklands.
- 6 TfL understands that the Government accepts HS2 Ltd's recommendations in respect of a Crossrail interchange station, because of its key role in integrating High Speed Two with London's transport networks, enhancing connectivity, facilitating passengers' end-to-end journeys and helping to relieve crowding on London Underground services at Euston. The Government expects that the existing Crossrail scheme will be delivered as defined and will open from 2017.
- 7 Over the coming months, HS2 Ltd will undertake further detailed work, in collaboration with Crossrail and its sponsors – the Department for Transport and TfL – as well as with Hammersmith and Fulham Council to develop more detailed plans for a Crossrail interchange station, which will form part of the formal public consultation on the route.
- 8 TfL is currently looking at possible links from the Kensal Gasworks site to Old Oak Common (a distance of about 1.5km following the canal edge). The finer details of the type of link are not yet available but TfL will require any development proposal at Kensal to at least make reference to the possibility of such a link. While it should be noted that such a project is many years away and may possibly never happen; current timescales envisage High Speed Two construction starting in 2017 with completion by 2025 (the end of the Core Strategy plan period).

**Question 3: The potential alternative (Plan B) to the Crossrail station is to improve local accessibility through bus based improvements and off-site rail improvements. Has adequate research been undertaken to show that these alternatives are deliverable and would support achievement of the Strategy?**

- 9 Concerning bus based improvements, TfL has agreed with the council a Statement of Common Ground dated 02 June 2010 (Council Document RBKC/1 Council Response to Inspector's Questions ID/3, ID/3A). In the Statement of Common Ground, TfL agrees with the council that additional bus services could increase the Public Transport Accessibility Level (PTAL) of the Kensal Gasworks site from three to four. It is understood that achieving the level of development stated in the Submission Core Strategy would require the PTAL to increase from three to at least four.

- 10 As noted by TfL at the draft Submission stage, the bus route shown in diagram 05 Kensal: Key Issues and Potential Opportunities is within land safeguarded for Crossrail (see attached drawing showing Crossrail safeguarding). However, TfL accepts that the details of any bus routes would be subject to further development and detailed discussion with TfL at an early stage.
- 11 Concerning off-site rail improvements, TfL understands that this reference relates to the provision of a new station at North Pole Road on London Overground. As stated at the draft Submission stage, TfL does not object to borough aspirations for new stations but wishes to make clear that TfL is not committed to a proposed new station at North Pole Road (it is not in the current TfL Business Plan and is not being considered as part of longer term proposals).

**Question 5: Access to the site is acknowledged to be limited and development is likely to require substantially improved infrastructure, including links over the railway line. It is also suggested that bridging of the canal would be necessary. Given the substantial nature of the railway formation and the presence of the Kensal Green Cemetery, how deliverable are these connections and what are the consequences of no provision being forthcoming?**

- 12 Concerning the bridge links across the railway at the Kensal Gasworks site (as proposed in the Submission document: paragraphs 5.1.8, 5.3.3, 20.2.6, Policy CA1 and diagram 05 Kensal: Key Issues and Potential Opportunities), TfL's position remains unchanged since providing comments on the draft Submission version of the Core Strategy. As stated in those comments, TfL notes that any proposed bridges would cross land safeguarded for Crossrail works (see attached drawing showing Crossrail safeguarding). TfL has no objections in principle to bridging over the railway but notes that there are no plans to construct any bridges in this location as part of the Crossrail scheme; as suggested in the question, the difficulties in bridging over the railway should not be underestimated.
- 13 TfL considers that a pedestrian link over the canal and through the Kensal Green Cemetery may not be well used, primarily due to concerns about personal safety. Unless these concerns can be overcome through the provision of appropriate security arrangements (e.g. locked gates at night), it is not considered to be a viable option for improving access to Kensal Green underground station.

TfL position statement on matters 3, 5 & 6 final version Approved