

Planning Statement

ECDC Planning
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EARLS COURT

We are creating a place the world will watch with wonder, on London's iconic site of human ingenuity.

Through our masterplan, we will reimagine the very fabric of living, working and urban wellbeing for London and future spaces.

Attracting the world's most inventive, imaginative and extraordinary minds.

That place is Earls Court.

We have a vision to bring the wonder back to Earls Court, transforming this long derelict site and reinstating it as a global destination for innovation and excitement. Since we acquired the site in 2019, we have been working collaboratively with local communities, continuously uncovering and discovering this historic piece of London. When the world seemed to pause as the pandemic hit in 2020, we progressed and used the opportunity to reflect, rethink and reset.

Through this process, our vision emerged, bringing to life the legacy of the Exhibition Centres and the role they played within the local community. This vision is based on four priorities:

- Open up the former Exhibition Centre site for the first time in 150 years – giving back to local communities
- A showground of world class ingenuity – celebrating its legacy and history
- Create a better piece of city – a blueprint for future generations
- Addressing the climate emergency – an ambition to go beyond net-zero

Our early activation of the site has brought entertainment, economic investment and excitement back, underpinning our learning and understanding of the site and the communities within which it sits. Looking to the future, we have a huge opportunity

to change the way people experience a place. An opportunity to challenge through:

- Reinventing the innovation economy
- Investing in London's cultural infrastructure
- Reconnecting with the natural world
- Re-defining city living for the future

The need for Earls Court couldn't be more timely. Our four place pillars underpin our vision and set the ambitions for the place we want to create:

- Earls Court will be a celebration of nature and its ability to connect and revive
- Earls Court will be a showcase for climate and clean innovation and skills
- Earls Court will be a cultural ecosystem for the future of talent
- Earls Court will be an inspiring neighbourhood designed for all stages of life

We will create a new west side story, putting Earls Court back on the map; it will be a place for everyone with inclusivity and consideration of diverse wants and needs. Above all, we will be good ancestors, creating a place which is future proof, climate resilient and establishes standards of excellence in design.

Earls Court will be the place where London dares.

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Executive Summary

This Planning Statement has been prepared by the Earls Court Development Company ("ECDC") on behalf of The Earls Court Partnership Limited ("ECPL") (the "Applicant") in support of two hybrid (i.e. part outline, part detail) planning applications, one submitted to the Royal Borough of Kensington and Chelsea ("RBKC") and the other to the London Borough of Hammersmith and Fulham ("LBHF") (each referred to as "Hybrid Application" and collectively as the "Hybrid Applications", the "Proposed Development" or the "Earls Court Development" hereafter) for the redevelopment of the Earls Court Development site (the "Site").

The RBKC Hybrid Application is formed of detailed development proposals in respect of Development Plots EC05 and EC06 for which no matters are reserved ("RBKC Detailed Component") and outline development proposals for the remainder of the RBKC Site, with all matters reserved ("RBKC Outline Component"). The RBKC Detailed Component and RBKC Outline Component together are referred to as the "RBKC Proposed Development".

The LBHF Hybrid Planning Application is formed of detailed development proposals in respect of Development Plots WB03, WB04 and WB05 for which no matters are reserved ("LBHF Detailed Component"), and outline development proposals for the remainder of the Site, with all matters reserved ("LBHF Outline Component"). LBHF Detailed Component and LBHF Outline Component together are referred to as the "LBHF Proposed Development".

Together the RBKC and LBHF Proposed Developments form the Earls Court Development which comprises the redevelopment of the Site.

The Earls Court Development represents a major opportunity to transform what is currently a highly accessible, but long term underused, brownfield site, within a London Plan Opportunity Area that is allocated for substantial mixed-use redevelopment, into a new thriving and sustainable part of London. It will provide a wide range of land uses, including residential dwellings, purpose-built student accommodation, assisted living, workspaces, culture, community, retail and leisure facilities alongside high quality public realm and open spaces.

The Proposed Development has evolved following the design-led approach through a four year period of wide-ranging and thorough pre-application consultation. It is landscape-led and will open the Site up to the public, providing east-west and north-south routes that prioritise pedestrians and cyclists through approximately 8 hectares of landscaped public realm that will include a diverse range of soft landscaped parkland and hard landscaped public open spaces joined by a permeable network of tree-lined routes. High quality new buildings have been arranged around the areas of public realm to create a mixed-use development that will optimise the use of the land and the public benefits it can provide, in accordance with strategic planning policy objectives.

The proposed mix of land uses has been carefully considered to embed flexibility that will allow the Proposed Development to respond positively to market demands over the next 15-20 years and make the Earls Court Development the most successful place it can be. The optimisation of the Site's capacity and proposed flexibility of land uses will mean it could deliver up to 3,900 new homes, including 35% (calculated by habitable rooms) as new affordable homes, as well as Purpose Built Student Accommodation ("PBSA") and a mix of non-residential employment-generating uses that could provide up to 14,500 new jobs. That mix will include significant new office and research and development floorspace designed to attract businesses of all sizes, as well as up to three new cultural venues, a variety of complementary retail, food and beverage and leisure uses and social

infrastructure such as early years education and community floorspace, which together will provide active frontages and interaction with the public realm.

Together, the proposed public realm and mix of land uses will create a new destination in West London and the Proposed Development will represent sustainable development and deliver good growth in accordance with the strategic direction of planning policy at all levels.

The purpose of this Planning Statement is to assess planning considerations of relevance to the Proposed Development in the context of national, regional and local planning policy (the "Development Plans"), with reference to guidance where relevant. The assessment within this Planning Statement demonstrates the compliance of the Proposed Development with the RBKC and LBHF Development Plans when read as a whole when its impacts are weighed in the planning balance with the significant range of public benefits it will deliver.

The Earls Court Development will bring forward a world class example of transformative urban development on the Site, the benefits of which will extend well beyond the Site's boundaries. Overall, the single most important and significant benefit is the Site's transformation to create a dynamic new place in West London that will open up this highly accessible, but long-term underused piece of brownfield land to the public and optimise its development output. It will create lasting connectivity between two London boroughs and deliver a network of attractive, diverse and inclusive public open spaces around which high quality new buildings will be arranged to provide substantial numbers of new homes, new jobs, new social infrastructure and new retail, leisure and cultural attractions that will bring activity and vibrancy back to Earls Court. It will be a place to live, a place to work and a place to spend time, while attracting new businesses, experiences and talent to the area.

It would not be possible to bring forward such an extent of urban change and the volume and range of public benefit associated with it, as anticipated by relevant site-specific planning policies, without resulting in some form of impact. But, the scale and nature of public benefit associated with the proposed redevelopment of the Site is considered by the Applicant to be so significant and transformative, that the impacts identified in supporting assessments, will be demonstrably outweighed.

ECDC, on behalf of the Applicant, is committed to delivering an exemplary sustainable development that will deliver the substantial public benefits described below over time, while promoting healthier lifestyles, inclusive spaces and an attractive urban landscape. Many benefits are intangible – the quality of design and place-making will be felt and experienced rather than counted in numbers. However, the Proposed Development will also deliver many tangible, or quantifiable, public benefits. A summary of these benefits, broadly grouped but not exhaustive, is set out below, and discussed in further detail in the submitted Public Benefits Statement and Social Value Statement. Taken together, this Planning Statement and those Statements demonstrate a significant range of social, economic and environmental benefits in accordance with the associated definitions within the National Planning Policy Framework and Planning Practice Guidance.

Place Creation

- **Landscape-led design approach to re-open the Site and amplify nature:** the design of the Proposed Development is landscape-led, with approximately eight hectares of publicly accessible landscape, including parks, public realm, playspace, greened or tree-lined roads and crescents. It will make a substantial contribution to the level of open space within the wider area, resulting in a significant public benefit for future residents as well as local communities and visitors to the Site from further afield, boosting health and wellbeing. The social value related to environmental quality has been estimated by the submitted Social Value Statement at £31 million.

- **High quality, inclusive and child friendly design:** The Applicant has committed to the delivery of high-quality buildings and landscape that have been designed to a very high standard through extensive engagement. This intent is articulated through the Detailed Components, and the Design Code and Parameter Plans that are submitted for approval for the Outline Component ensure that beautiful buildings will be delivered throughout the lifetime of the Proposed Development.
- **Cultural and leisure destination and supporting creative industries:** Culture is a vital part of the approach to the creation of a new place and destination on the Site. Demonstrated by the active and varied meanwhile use, arts and cultural strategies that are well underway on the Site, bringing activity and vibrancy back to Earls Court is a central part of the vision for the Site. The Proposed Development includes floorspace to accommodate a range of types and scales of cultural uses in a variety of locations. This will bring new people, attractions, employment and business opportunities to this part of West London and broaden the variety of activities available to the community. This will help boost local pride and can be effective in promoting social cohesion. Local artists are already engaged in the public art strategy for the Site, which seeks to bring the site's heritage and local identity into its future. The submitted Social Value Statement estimates that the social value of the cultural uses proposed could equate to £34.4 million.
- **Provision of social infrastructure:** A community hub will form part of the LBHF Detailed Component. This space will have the potential to accommodate a range of uses for the community, including healthcare facilities, space for youth activities, elderly, community focused events, programmes and activities and wellbeing space for classes. The submitted Social Value Statement estimates that the social value that could be created by the community hub could equate to £20.3 million. In addition, a nursery will be provided within the RBKC Detailed Component and the Outline Components will include flexibility to provide a range of health facilities, education facilities and further community space.
- **Retail, restaurants and other active ground floor uses:** will not only create a public benefit in terms of offering residents and workers a greater range of facilities in this area and active frontages that will interact and interface with the public realm, but also deliver a diverse range of jobs along with the workspace, benefiting jobs seekers across a broad spectrum of skills and job types.
- **Estate Management:** ECDC, on behalf of the Applicant, is committed to ensuring that a sustainable, vibrant, safe and inclusive place is created by the Proposed Development. The submitted Estate Management Framework sets out how and maintenance, servicing and community engagement is intended to be managed to ensure this commitment is realised.

Housing

- **Up to 3,900 new homes,** including 35% affordable housing (by habitable room), are proposed across a range of types and tenures including private for sale, build to rent, social rented, shared ownership & intermediate for rent, in addition to new student housing (which will include 35% affordable bedrooms), as well as the potential for co-living and older persons living that will make a significant contribution to housing delivery in RBKC and LBHF.
- **Wider economic benefits from housing:** The Illustrative Masterplan suggests that household spending by new residents in the local economy could be in the region of £40 million per year and a further £5.5 million per year from student spending, helping to support local town centres within LBHF and RBKC. Council tax (£4.4 million per year) and New Homes Bonus (£6.8 million as a single payment) would also be generated as important revenue for both local authorities and the GLA.

- **New high quality, energy efficient housing** is proposed which will reduce carbon emissions, energy use and the cost for residents to run their own homes. The provision of energy efficient homes has been estimated by the submitted Social Value Statement to have a social value of £1.185 million.

Employment and Economic Development

- **Delivery of a new employment district and Major Centre, new permanent jobs and a range of business and employment opportunities:** The Proposed development will deliver a range of complementary land uses in a highly accessible location to create a new Major Centre in line with the definition set out in the London Plan. The Commercial Strategy includes the creation of a significant amount of workspace across the Site in a range of forms, types and scales ranging from modern large scale office space to smaller workspace and affordable workspace to attract and accommodate business of all sizes, including Small-Medium Enterprises, creative industries, corporations and logistics operators. This will create opportunities for local businesses to benefit from the agglomeration effects from new businesses moving to the Site. The Commercial Strategy is also designed to attract inward investment and open new opportunities through collaboration and supply chain benefits. Up to 14,500 direct jobs (FTE) could be accommodated as part of the Proposed Development.
- **Affordable workspace** will be delivered through a flexible arrangement (subject to further discussion with RBKC and LBHF officers) that will prioritise the needs of businesses to assist with occupation and operation of workspace (for example in relation to rent discounts, assistance with fit out costs, provision of co-working spaces). The framework for how affordable workspace will be delivered will be discussed and agreed with RBKC and LBHF as part of S106 Agreement discussions post-submission of the Hybrid Planning Applications.
- **Ensuring access to employment, skills and training opportunities:** During the construction phase it is estimated there will be approximately 1,150 full time construction jobs created on average over the build programme. The scale of this project creates a fantastic opportunity for workers within this sector to gain valuable skills and training opportunities over the long term. The Applicant is committed to supporting employment initiatives to maximise local benefit (in line with TfL's Sustainable Development Framework and both borough's planning obligation guidance).
- **Wider economic benefits from workspace:** Based on the Illustrative Masterplan, it is estimated that the employment within the Proposed Development would generate approximately £1.2 billion GVA per year to the economy as a whole and the spending by workers within the local economy could be in the region of £30 million per year and the estimated business rates revenue could be in the region of £38 million per year.
- **Commitment to the continued implementation of a meanwhile use strategy** to benefit existing residents and workers throughout the determination and construction stages of development.
- **Provision of a Logistics Hub:** Space created below the Table Park is designed to allow consolidation of logistics and reduce vehicles coming into the site, as well as reducing impacts on local road networks, with potential to include a Logistics Hub facility for consolidation of goods for delivery to the local area, which is currently lacking in this part of London.

Good Growth and Sustainable Development

- **Optimisation of site capacity and density:** in line with the strategic objectives of planning policy at all levels, the Proposed Development has been prepared through extensive pre-application engagement and design evolution to make the most effective use of the land and deliver good growth. It will deliver a sustainable development that provides substantial amounts of new public realm, homes and jobs in a highly sustainable and accessible Opportunity Area location.
- **Exemplar in sustainability:** The Applicant has proposed an innovative Sustainability Strategy that encompasses three pillars of sustainability that goes above and beyond the requirements of planning policy in many respects, focussing on environmental wellbeing; social value; and economic inclusion. The Applicant's ambition is to go beyond net zero, and create a future proofed, resilient and sustainable development.

Transport

- **Connectivity improvements:** Earls Court is in a highly sustainable location, with very good public transport links, but has been closed to the public for many years. The Proposed Development will re-open the Site, create pedestrian and cyclist-priority routes through the Site, incorporating sustainable transport initiatives through an approved Travel Plan, and contributing to improvements to signage and wayfinding, pedestrian access to stations and cycle routes outside the Site.
- **Transport improvements:** The Proposed Development will provide financial contributions towards a range of station, highway, bus service and cycle route improvements, which will be agreed through on-going engagement with the LPAs and TfL and subject to S106 obligations.

The Applicant is of the considered opinion that the Proposed Development complies with the most relevant planning policies at national, regional and local levels and is in overall conformity with the relevant Development Plans when read as a whole. While there are some adverse impacts identified within this Planning Statement and relevant supporting documents, including on neighbour amenity and heritage impacts, the identified impacts are clearly and convincingly outweighed by the very significant tangible and intangible benefits set out in this Planning Statement.

1. Introduction

1.1 This Planning Statement has been prepared by the Earls Court Development Company on behalf of The Earls Court Partnership Limited (“ECPL”) (the “Applicant”) in support of two hybrid planning applications, one submitted to the Royal Borough of Kensington and Chelsea (‘RBKC’), and one submitted to the London Borough of Hammersmith and Fulham (‘LBHF’), in relation to the redevelopment of land bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the West London Railway Line (‘WLL’) in RBKC (the ‘RBKC Site’) and North End Road, Beaumont Avenue, West Cromwell Road, the WLL, land comprising the Empress State Building, Aisgill Avenue, the former Gibbs Green School, properties fronting Gibbs Green Close and properties fronting Dieppe Close in LBHF (the ‘LBHF Site’) which straddle the boundary between the two Boroughs (together forming ‘the Site’). The Proposed Development will form the new proposed Earls Court Development.

1.2 Planning permission for the RBKC Hybrid Planning Application is sought for the following:

“Hybrid planning application for part outline (all matters reserved) and part detailed (no matters reserved) planning permission for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed use development comprising Residential (Class C3), Workspace (Class E), Cultural Facilities (Class F1 / Sui Generis), Older Persons Housing (Class C2), Hotel (Class C1), Retail (Class E), Leisure (Class E / F2), Education (Class E / F1), Community Facilities (Class F2), Storage and Distribution (Class B8) and Sui Generis uses (to include Student Accommodation, Co-Living, Theatre, Car Showroom, Nightclub, Drinking Establishment (with or without expanded food provision), Hot Food Takeaway, Live Music Performance Venue, Cinema, Concert Hall, Bingo Hall and Dance Hall uses) above and below ground level and all associated and ancillary works and structures including temporary development, highway and infrastructure works and structures.”

1.3 Planning permission for the LBHF Hybrid Planning Application is sought for the following:

“Hybrid application for part outline (all matters reserved) and part detailed (no matters reserved) planning permission for demolition and alteration of existing buildings and structures and phased redevelopment to include landscaping, car and cycle parking, means of pedestrian, cycle and vehicular access and routes and mixed use development comprising Residential (Class C3), Workspace (Class E), Student Accommodation (Sui Generis), Cultural Facilities (Class F1 / Sui Generis), Co-Living (Sui Generis), Older Persons Housing (Class C2), Health (Class C2 / E), Hotel (Class C1), Community Facilities (Class F2), Retail (Class E), Leisure (Class E / F2), Education (Class E / F1), Storage and Distribution (Class B8) and Sui Generis uses (to include Bus Parking Facility, Theatre, Car Showroom, Nightclub, Drinking Establishment (with or without expanded food provision), Hot Food Takeaway, Live Music Performance Venue, Cinema, Concert Hall, Bingo Hall and Dance Hall uses) above and below ground level and all associated ancillary works and

structures including temporary development, highway and infrastructure works and structures.”

- 1.4 The two Hybrid Planning Application proposals are referred to collectively as the “Proposed Development”.
- 1.5 The RBKC Hybrid Planning Application is formed of detailed development proposals in respect of Development Plots EC05 and EC06 for which no matters are reserved (“RBKC Detailed Component”), and outline development proposals for the remainder of the RBKC Site, with all matters reserved (“RBKC Outline Component”). The RBKC Detailed Component and RBKC Outline Component together are referred to as the “RBKC Proposed Development”.
- 1.6 The LBHF Hybrid Application is formed of detailed development proposals in respect of plots WB03, WB04 and WB05 for which no matters are reserved (“LBHF Detailed Component”), and outline development proposals for the remainder of the Site, with all matters reserved (“LBHF Outline Component”). LBHF Detailed Component and LBHF Outline Component together are referred to as the “LBHF Proposed Development”.
- 1.7 Together the RBKC and LBHF Proposed Developments form the Earls Court Development which comprises the redevelopment of the Site.

Background to the Proposed Development

- 1.8 The Earls Court Site is underused and has been identified for redevelopment for over a decade. The version of the London Plan published in 2011 identified the ‘Earls Court & West Kensington Opportunity Area’ which the Site forms a large part of.
- 1.9 Two Outline Planning Permissions (OPPs), one in RBKC and one in LBHF, were granted in November 2013 for the redevelopment of the Site, in addition to that of the West Kensington and Gibbs Green Estate land to the west in LBHF. Those OPPs were implemented in 2015 through the demolition of the former Earls Court Exhibition Centres but have not been progressed in anticipation of a new proposal coming forward for the redevelopment of the Site. Much of the Site now stands underused awaiting redevelopment.
- 1.10 The Applicant, ECPL, is a joint venture between Delancey (on behalf of its client funds) and Dutch pension fund manager APG (together a joint venture titled Earls Court (London) LLP) and Transport for London (“TfL”). ECPL purchased the majority of the Site in 2019 from previous owners Capital and Counties (“CapCo”), while the remainder, known as the Lillie Bridge Depot (“LBD”), is owned by TfL and is subject to a conditional land sale agreement to ECPL. West Kensington and Gibbs Green Estate do not form part of the Proposed Development.
- 1.11 The Applicant set up the ECDC in December 2019 to manage the redevelopment of the Site, establishing its offices at the Project Rooms on Empress Place.

- 1.12 ECDC, on behalf of the Applicant, ran a design competition for a masterplan architect in 2020, appointing Hawkins Brown and Studio Egret West to work in partnership to develop a masterplan vision for the Site. ECDC has since led a wide-ranging and sustained process of pre-application consultation and engagement over the past four years with members of the public, stakeholder groups, statutory bodies, four separate design review panels, as well as extensive engagement with Greater London Authority (“GLA”), RBKC and LBHF officers and politicians. That process has been invaluable in helping to shape and evolve the Proposed Development that is the subject of Hybrid Planning Applications to ensure that it has been designed to deliver the long-awaited redevelopment of the Site in a sustainable way that will be for the benefit of its future residents, workers, visitors, and the existing local communities in RBKC and LBHF and beyond.

Vision and Key Drivers for the Proposed Development

- 1.13 ECDC, on behalf of the Applicant, and its project team spent a significant amount of time in 2020 holding collaborative workshops with local residents, community organisations and amenity groups. Through this early engagement, an understanding of what the Site and its history means to people was established and it helped to set the vision and key drivers for the Proposed Development, which are many and wide ranging, as summarised below:

Vision

- 1.14 The vision is to bring the wonder back to Earls Court.
- 1.15 For 150 years Earls Court has been known as a global showcase for innovation, entertainment and excitement. A place known for wonder. A source of entertainment, employment and excitement, the Earls Court Exhibition Centres were alive with activity.
- 1.16 The vision has been informed by the requirements of the Planning Policy Framework, and a detailed character assessment and growth strategy for the Site, following the approach set out by the Characterisation and Growth LPG (2023).

Four Priorities

- 1.17 The vision is based on four priorities which stemmed from ECDC’s engagement with the community and stakeholders:
- Open up the former Exhibition Centre site for the first time in 150 years – giving back to local communities;
 - A showground of world class ingenuity – celebrating its legacy and history;
 - Create a better piece of city – a blueprint for future generations; and
 - Addressing the climate emergency – an ambition to go beyond net-zero.

Four Place Pillars

1.18 As initial designs for the Proposed Development emerged, ECDC developed four ‘Place Pillars’ in consultation with local residents and stakeholder groups, which underpin the vision and set the ambitions for the place to be created on the Site:

- Earls Court will be a celebration of nature and its ability to connect and revive;
- Earls Court will be a showcase for climate and clean technology innovation and skills;
- Earls Court will be a cultural ecosystem for the future of talent; and
- Earls Court will be an inspiring neighbourhood designed for all stages of life.

Planning Statement Structure

1.19 The purpose of the Planning Statement is to assess the planning considerations associated with the Proposed Development in the context of national, regional and local planning policy and guidance. The Planning Statement comprises the following:

- Chapter 2: describes the Site and surrounding area.
- Chapter 3: describes the planning history of the Site.
- Chapter 4: summarises the engagement process undertaken prior to the submission of the Hybrid Planning Applications.
- Chapter 5: provides a description of the Proposed Development.
- Chapter 6: sets out the planning policy framework on which the Proposed Development is assessed.
- Chapter 7: assesses the Proposed Development against relevant planning policy and guidance considerations.
- Chapter 8: sets out Section 106 (“S106”) Agreement Draft Heads of Terms and Community Infrastructure Levy (“CIL”) considerations.
- Chapter 9: provides a statement of the public benefits associated with the Proposed Development.
- Chapter 10: provides the conclusions of this Planning Statement.

Content of the Hybrid Applications and Environmental Impact Assessment Scoping

1.20 This Statement should be read and considered in conjunction with the suite of planning application documents and drawings out in the Planning Application Documents and drawing Schedules that have been submitted with the Hybrid Planning Applications.

- 1.21 Due to the scale and nature of the Proposed Development, an Environmental Impact Assessment (“EIA”) has been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The Earls Court Development Applicant and Project Team

- 1.22 The Applicant for the Hybrid Applications is ECPL.
- 1.23 ECDC is the business manager responsible for the preparation and submission of the Hybrid Planning Applications and delivery of the Earls Court Development on behalf of ECPL. ECDC has a successful track record of the delivery of meanwhile uses on the Site, which has already brought public benefits to Earls Court for the first time in almost ten years.
- 1.24 The Earls Court Development project team has developed over the past four years. The masterplan architect is a partnership between Hawkins Brown and Studio Egret West (“HBSEW”). HBSEW have led on the design vision for the Site and the Outline Components in either borough, but central to that vision and the Proposed Development has been the landscape design which has been led by Stig Lennart Andersson (“SLA”) and Studio Egret West (“SEW”).
- 1.25 ECDC is also driven to deliver a development that is exemplary and innovative in its approach to sustainability. Hoare Lea has been appointed to lead a team of specialist consultants to prepare the Sustainability Strategy for the Proposed Development. WSP has been appointed to lead on the preparation of transport-related strategies to minimise the impacts associated with the development and Turner & Townsend (“T&T”) has led the preparation of initial construction logistics and phasing work to consider how the Proposed Development could be delivered from an early stage of the design process.
- 1.26 The RBKC Detailed Component design is led by Maccreanor Lavington architects. The landscape architect is Gillespies.
- 1.27 The LBHF Detailed Component has been designed by a team of architects comprising Sheppard Robson, Serie and dRMM. The landscape architect is LDA Design.
- 1.28 The Hybrid Applications are also supported by a number of strategies, reports and assessment documents that have been prepared by a wider specialist consultant team.

2. Site and Surrounding Area

The Earls Court Development Site

- 2.1 The Site is a large brownfield site that covers approximately 18 hectares in total, with approximately 8 hectares within RBKC and 10 hectares within LBHF.
- 2.2 The LBHF and RBKC administrative boundary bisects the Site along a northwest / southeast axis from West Cromwell Road in the north to Lillie Road in the south. The two Hybrid Application boundaries are shown on the submitted '001 – Site Location Plan' as shown in Figure 1 below:

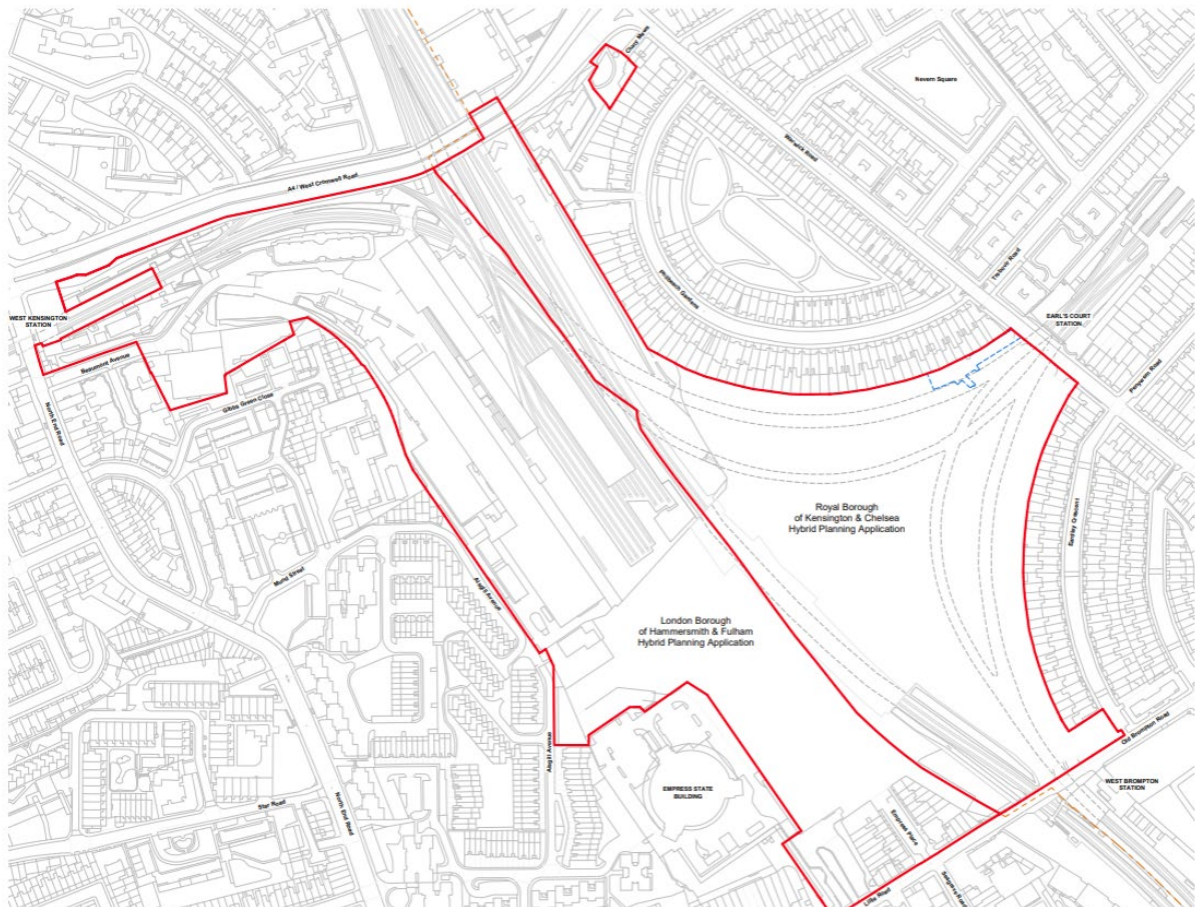


Figure 1: 001 Site Location Plan

- 2.3 The Site broadly comprises the following parts, moving clockwise from north, which are identified on the annotated Existing Site Plan submitted with the applications:

- **West Cromwell Road (A4):** The road forms the northern boundary of the Site, with the exception of a small section where the Site boundary extends north beneath the road into the basement of the Tesco supermarket car park.
- **Cluny Mews:** The far north-eastern part of the Site comprises the existing 1 Cluny Mews office building at approximately 4 storeys and a building which comprises up to 3 storeys of residential flats and associated paved highway with on-street parking.
- **Former Exhibition Centre land:** The eastern and south-central parts of the Site (roughly triangular shaped to the east of the West London Line (“WLL”), and rectangular to the west) comprises areas of hardstanding and made ground with limited frontages onto Warwick Road to the east, Old Brompton Road, Lillie Road to the South and Aisgill Gardens to the west. This area was previously occupied by the Earls Court Exhibition Centre buildings which were demolished between 2015 and 2017. Much of the western part is currently occupied by temporary (or ‘meanwhile’) non-residential land uses, including an exhibition building. A retained deck (referred to as the ‘Table’) spans the WLL between the two areas of hardstanding and made ground. Beneath the eastern part is a network of railway infrastructure including the District Line and Piccadilly Line and the disused Grade II listed Earls Court station Exit 3 escalator bank and ticket hall.
- **Empress Place:** The southern and south-western parts of the Site comprise existing commercial and residential properties within 3-4 storey terrace buildings fronting Empress Place and Lillie Road, which includes The Prince public house, ECDC offices (known as The Project Rooms) and a range of temporary retail, food and beverage and artist studio uses.
- **TfL Bus Facility:** To the west of Empress Place in the south western corner of the Site is a bus turning and waiting facility with capacity for up to four buses accessed from Lillie Road, with associated staff welfare facilities.
- **Lillie Bridge Depot (‘LBD’) land:** The north western part of the Site comprises the LBD, which is currently used as a TfL training facility and as a maintenance facility by LUL. The LBD uses and on-site structures comprise office buildings, rail tracks, Road to Rail Vehicle (‘RRV’) delivery and access points, delivery areas, workshops, storage areas and buildings, a train stabling box and associated infrastructure and parking.
- **Beaumont Avenue:** Located in the north western part of the Site and includes a part one, part 2 storey building at 9 Beaumont Avenue, which is temporarily in use as an interactive theatre experience.

The RBKC Site

2.4 The RBKC Site is bound to the north by West Cromwell Road, to the east by Warwick Road, Philbeach Gardens (including 1 Cluny Mews) and Eardley Crescent, to the south by Lillie Road and Old Brompton Road and to the west by the West London Railway Line (WLL). The majority of the land has been cleared awaiting redevelopment, but also includes the following buildings and existing land uses, set out in Table 1 below:

Table 1: RBKC Hybrid Application Site Existing buildings		
Building / Location	Use Class	Approx. Area (sqm GIA)
1 Cluny Mews	E(g)	1,762
Residential properties, Cluny Mews	C3	267
Earls Court Station Emergency Exit	Sui Generis	20

2.5 Piccadilly and District London Underground rail infrastructure lies beneath a large part of the central area of the RBKC Hybrid Application Site.

2.6 Existing access to the RBKC Site is via the Tesco supermarket car park to the north, Cluny Mews to the north west, Warwick Road to the east and Old Brompton Road to the south.

The LBHF Site

2.7 The LBHF Site is bound to the east by North End Road, Beaumont Avenue, The Former Gibbs Green School and properties fronting Dieppe Close, to the north by West Cromwell Road, to the west by the WLL, to the south by Lillie Road and to the south east by land comprising the Empress State Building and Aisgill Avenue.

2.8 The northern part of the LBHF Site is taken up by railway infrastructure and the Lillie Road Depot buildings which are used as a training and maintenance facility by TfL and comprises a series of train sheds, industrial and office buildings, including Ashfield House, an existing 10 storey office building. The central portion of the Site is currently being used for meanwhile uses and includes a temporary exhibition space and a community centre.

2.9 The southern part of the LBHF Site includes the properties fronting Empress Place and Lillie Road, which are in temporary use as homes, affordable workspaces and retail units, and TfL's bus parking facility which is located on Empress Approach adjacent to the Empress State Building. A variety of temporary buildings occupied by temporary (or 'meanwhile') uses cover the central section of the LBHF Site, which has previously been cleared awaiting redevelopment.

2.10 In summary, it includes the following buildings and their land uses, set out in Table 2 below:

Table 2: LBHF Hybrid Application Site Existing Buildings		
Building / Location	Use Class	Approx. Area (sqm GIA)
Ashfield House (within TfL LBD land)	E(g)	10,125

Other TfL Lillie Bridge Depot Buildings	E(g)	17,488
Empress Place and properties fronting Lillie Road	C3 and E(a)/(b)/(g) (temporary uses)	6,592
9 Beaumont Avenue	Sui Generis – theatre (temporary use)	2,867
Properties fronting North End Road and Beaumont Avenue	Retail / other	100

2.11 Existing access to the LBHF Site is via Empress Approach and Empress Place to the south, Aisgill Avenue to the west, Beaumont Avenue to the north west and West Cromwell Road to the north.

The Surrounding Area

2.12 The area surrounding the Site is predominantly residential in nature and is walking distance of two local high streets, Earls Court Road to the east, and North End Road to the west.

2.13 To the north and east, building heights vary between four and seven storeys and include large terraces of Victorian housing of up to five storeys in height. Along Warwick Road and the adjoining streets to the east, there is a large number of mansion blocks of up to eight storeys in height.

2.14 Immediately to the north west of the Site is the West Cromwell Road Bridge and an existing Tesco store (100 West Cromwell Road), upon which a new residential-led mixed use development of up to 29 storeys (known as 100 West Cromwell Road) is currently under construction. Modern blocks of up to 16 storeys that comprise the Warwick Road masterplan extend to the north of 100 West Cromwell Road between the WLL and Warwick Road. The Grade I listed St Cuthberts Church is located next to part of the north eastern corner of the Site.

2.15 To the south east of the Site is Brompton Cemetery, which is a large (approximately 16 hectares) publicly accessible cemetery that is also a Grade I Listed Park and Garden and Conservation Area. The entrance gates to the Cemetery, arcades forming the Great Circle and Avenue as well as a number of tombs within the Cemetery are individually listed. The Cemetery also includes a Grade II* Listed Church of England Chapel towards its southern end.

2.16 The area immediately to the south of the Site is characterised by West Brompton station, rail infrastructure and commercial and residential buildings of varying ages and heights up to 14 storeys that line Lillie Road, including nos. 62 to 68 Lillie Road to the south west of the Site, which are Grade II listed.

2.17 Beyond Lillie Road extend grids of terraced, predominantly residential streets that align in an east west orientation, interspersed with more contemporary apartment buildings of

predominantly four to eight storeys in height adjoining a new linear park as part of the Lillie Square development, which includes a 16 storey building to the south east of the Site fronting Seagrave Road.

- 2.18 The Empress State building lies next to the south west corner of the Site and at 31 storeys is the tallest building within the immediate area.
- 2.19 To the west of the Site, lie the West Kensington and Gibbs Green Estates which are varied in their form, layout and character and comprise residential buildings ranging in height from 2 to 10 storeys.
- 2.20 To the north and west, within the immediate area of the Earls Court Site are large buildings of typically up to eight storeys in height with large footprints comprising a mixture of commercial and residential uses that line West Cromwell Road.

Heritage Context

- 2.21 The only listed building or structure on the Site is an emergency exit structure to the Grade II listed Earl's Court Station Underground Ticket Hall, the remainder of which lies beneath, but does form part of the RBKC Site. The Site is partly located within the boundary of the Barons Court Conservation Area in LBHF (small northwestern section) and the Philbeach Conservation Area in RBKC (small southeastern section).
- 2.22 The Earls Court Development has the potential to affect the setting of statutorily designated heritage assets in the surrounding area as a result of change to their setting. A map is submitted as part of the submitted Heritage Impact Assessment ("HIA") which lists all the assets within a 1km radius, which comprises 149 listed buildings, 33 conservation areas and three Registered Park and Gardens.
- 2.23 Non-designated heritage assets, including locally listed buildings have also been considered. RBKC does not publish a local list, but regard is had to relevant Conservation Area Appraisals (which identify 'Positive Buildings'). The LBHF Local List has been reviewed as part of the heritage analysis.
- 2.24 The Proposed Development has had regard to all designated heritage assets and in particular:
- Brompton Cemetery (Grade I Registered Park and Garden) and attendant Brompton Cemetery Conservation Area (RBKC)
 - Church of St Cuthbert and St Matthias on Philbeach Gardens (Grade I) and attendant Philbeach Conservation Area (RBKC)
 - Nos. 35-37, 39, 41, 43 and 45 Harrington Gardens (Grade II*) (RBKC)
 - Nevern Square Conservation Area (RBKC)
 - Earls Court Square Conservation Area (RBKC)

- Nos 62-86 Lillie Road (Grade II) (LBHF)
- Olympia and Avonmore Conservation Area (LBHF)
- Barons Court Conservation Area (LBHF)

Accessibility

Public Transport

- 2.25 The majority of the Site has a PTAL rating of 6a and 6b.
- 2.26 The Site is in close proximity to three rail stations: Earls Court Station, served by the Piccadilly Line and the District Line adjacent to the eastern boundary of the Site, West Brompton Station, served by the London Overground and District Line adjacent to the western boundary of the Site and West Kensington Station, served by the District Line is located adjacent to the north western boundary of the Site.
- 2.27 The Site is also well served by multiple bus routes:
- A3320 Warwick Road:
 - 328 – to Golders green
 - C3 – to Earls Court
 - 74 – to Baker Street Station
 - C1 – to White City
 - B317 North End Road:
 - 306 – Acton Vale to Sands End
 - 28 – Kensal Rise to Wandsworth
 - A3218 Lillie Road:
 - 74 – Putney to Baker Street Station
 - 430 – Roehampton to South Kensington
 - 190 – West Brompton to Richmond

Walking and Cycling

- 2.28 The Site currently lacks pedestrian and cycle infrastructure and acts as a barrier to movement in the local area. However, the Site is well connected to a comprehensive network of footways and cycle routes, making it possible to reach key transport nodes on the edges of the Site by foot quickly and the majority of Central London and key town centres are reachable within a 30-minute cycle.
- 2.29 At present, the closest Cycle Hire Docking Station is located at Trebovir Road approximately 100m from the access to the Site on Warwick Road. There are also a number of other cycle docking stations within close proximity to the Site.

Local Highway Network

- 2.30 The Site is strategically located on the highway network close to central London.
- 2.31 The Site's northern edge lies adjacent to West Cromwell Road which connects central London to Heathrow and the west. Its eastern edge lies adjacent to Warwick Road which runs south to north from Old Brompton Road in the south to Kensington High Street in the north.
- 2.32 The Site's southern edge lies adjacent to Lillie Road which runs east to east from West Brompton Station in the east to the A219 Fulham Place Road in the west and Old Brompton Road runs from east to west from West Brompton Station in the west to South Kensington Underground Station in the east.
- 2.33 The Site's western edge lies adjacent to the North End Road which runs from north to south from A304 Fulham Road in the south to A315 Hammersmith Road in the north, Beaumont Avenue which provides access to the LBD from North End Road, and Mund Street / Aisgill Avenue are internal roads within the West Kensington and Gibbs Green estates.

3. Planning History

- 3.1 This chapter sets out a summary of the planning history records of most relevance to the Site.

2013 Outline Planning Permissions

- 3.2 There are two implemented and extant outline planning permissions ('OPPs') that relate to the Site, one in RBKC and one in LBHF, alongside related Reserved Matters Approvals and other linked applications.

- 3.3 Within the RBKC Site:

- RBKC OPP (ref. PP/11/01937) dated 14th November 2013, as amended by various NMAs. The boundary of this permission covers the entirety of the RBKC Site.

“Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3), office use (Class B1), retail use (Classes A1-A5), hotel and serviced apartments uses (Class C1), education, health, community, culture and leisure use (Class D) below ground ancillary space (including parking/plant /servicing), vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities, enabling works including related temporary works including construction of an access road and structures and other works incidental to the development”

- Reserved Matters for 'Earls Court Village Area' (ref. PP/13/07062) dated 3rd April 2014
- West Brompton Square (PP/15/00369) dated 1st April 2015 and implemented in April 2019
- Reserved Matters for Development Plot WV03 (ref. PP/16/07386) dated 3rd May 2017
- In October 2021, planning permission (ref. PP/21/00272) was granted for the redevelopment of 344-350 Old Brompton Road ("OBR") for development comprising a 5 to 9-storey residential and commercial building on the south eastern corner of the Site. Subsequently, an NMA (ref. NMA/23/02884) was granted to OBR for minor below ground structural changes to facilitate the relocation of High Voltage cables adjacent to the approved development
- Temporary planning permission for the installation of three Glass Reinforced Plastic (GRP) enclosures and full planning permission for a subterranean high voltage (HV) cable duct. (PP/23/08120)

3.4 Within the LBHF Site:

- LBHF OPP (ref. 2011/02001/OUT) dated 14th November 2013, as amended by various NMAs. The boundary of this permission includes the entirety of the LBHF site, but also extends to a wider area encompassing the West Kensington and Gibbs Green Estates.

“Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3); office (Class B1); retail (Classes A1- 5); hotel and serviced apartments (Class C1); leisure (Class D2), private hospital (Class C2); Education/Health/Community/Culture (Class D1); below ground ancillary space (parking/plant/servicing etc). Replacement of the existing London Underground depot at Lillie Bridge with new depot, vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities, enabling works including related temporary works and structures and other works incidental to the development.”

- Reserved Matters for Earls Court Village Area (ref. 2013/05200/RES) dated 10th April 2014
- Prior Notification of Demolition of existing podium slab to enable future redevelopment of the site. (PA/23/08286)

3.5 In addition, several temporary planning permissions have been granted for meanwhile uses to occupy parts of the Site. These are summarised below:

- 9 Beaumont Avenue (ref. 2022/0146/FUL): A temporary immersive theatre experience
- The London Wonderground at Earls Court in partnership with Underbelly Summer 2021 & 2022 (2022/00520/FUL): Over 160,000 people visited the free to enter festival across both summers to see a range of theatre, circus and comedy, alongside food stalls and fairground rides
- Community Hub (ref. 2021/03095/FUL) : A social haven for the community to enjoy, with a range of free activities alongside a serene garden managed by Hammersmith Community Gardens Association and supported by a resident led gardening club. Each week hundreds of local residents take advantage of the range of classes and happenings at the Hub, which is also home to the 10th Fulham Scouts
- Lillie Road Shops (2020/02100/FUL, 2020/02098/FUL, 2023/02737/FUL and 2023/02739/FUL): The pop-up high street on Lillie Road includes a curated mix of independent retailers and artisans
- Empress Studios (ref. 2021/04027/FUL): In partnership with LOWE Guardians ECDC refurbished and brought homes on Empress Place and Seven Stars, North End Road back into use at discounted rents for key workers and people on low incomes. The homes are at full occupation. In partnership with This is Projekt, ECDC turned six vacant Victorian townhouses on Empress Place into 46 affordable creative studios designed for the community

- 'Live entertainment' space (ref. 2022/02045/FUL and 2024/01054/NMAT): Installation of a temporary building which hosted the BBC Earth Experience and was visited by over 375,000 people in 10 months. Under an NMA, this space is due to be transformed into a 'live entertainment' space to host an immersive/interactive production
- Warwick Road Apron (ref. PP/22/02336): Following on from previous partnerships with London Design Festival and Kensington and Chelsea Art Week, a 'Summer of Art' programme was unveiled during the summer of 2023 featuring public art installations and exhibitions
- Skills Centre (ref. 2022/03425/FUL): Together with Places for London and the Skills Centre, ECDC opened west London's newest cross-borough centre for future education. This will be a central point for training and enterprise throughout the lifetime of the project, working with community groups and future employers to upskill local people
- Padel Courts (ref.2023/02631/FUL): ECDC launched an outdoor Padel showcase court in collaboration with Padel Social Club. In spring 2024, the Padel Social Club expanded to a further four courts, a club house and bar, and wellness facilities.

3.6 Further to the permissions noted above, a fuller list of planning permissions of relevance to the Site is provided at Appendix 1.

4. Pre-application Engagement

- 4.1 ECDC, on behalf of the Applicant, has led an extensive four year pre-application process that has included engagement with members of the public, stakeholder groups, statutory bodies, four separate design review panels, as well as extensive engagement with GLA, RBKC and LBHF officers and politicians.
- 4.2 This section does not set out all feedback received during the pre-application process (feedback is referred to as part of the assessment commentary in Chapter 7 below and within the submitted Statement of Community Involvement (“SCI”)), but instead provides a summary of the consultation process undertaken, including the pre-application engagement process with the GLA, TfL, RBKC, LBHF, and other statutory consultees. It also summarises the public consultation process that is described in detail in the SCI and Chapter 4 (Design Evolution) of the Design and Access Statement (“DAS”) Volume 1: Outline Component, and Chapter 4 (Design Development and Consultation) of the DAS Volume 2: RBKC Detailed Component and DAS Volume 3: LBHF Detailed Component, submitted as part of the Hybrid Applications.

EIA Scoping Request

- 4.3 As part of the pre-application engagement process and due to the scale and nature of the Proposed Development, an Environmental Impact Assessment (“EIA”) has been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and an Environmental Statement (“ES”) is submitted as part of the Hybrid Applications.
- 4.4 A formal request for an EIA Scoping Opinion was submitted to RBKC and LBHF on 26th October 2023 (RBKC reference: EIA/23/06953 and LBHF reference: 2023/02817/SCOEIA). RBKC issued its Scoping Opinion 29th November 2023 and LBHF issued its Scoping Opinion on 13th December 2023. Copies of both Opinions are appended to the submitted ES. The ES submitted in support of the Hybrid Applications is in compliance with both Scoping Opinions.

Mayor of London Referral

- 4.5 The Hybrid Applications are referable to the Mayor of London as the Proposed Development, within both Applications, exceeds the relevant thresholds set out in The Town and Country Planning (Mayor of London) Order 2008. Accordingly, the GLA has been involved in formal pre-application discussions with the Applicant, RBKC and LBHF from an early stage.

Pre-application Engagement

- 4.6 Regular pre-application engagement with RBKC, LBHF, GLA and TfL officers has been ongoing since mid-2020. A project team comprising ECDC (acting on behalf of the Applicant), and its design team and specialist technical consultants has attended a total of over 250

pre-application meetings and technical workshops with RBKC, LBHF, GLA and TfL officers over the past four years.

- 4.7 These meetings and workshops have been undertaken collaboratively to progress the design and composition of the Proposed Development from an initial masterplan concept and strategic framework to the Proposed Development that is the subject of the Hybrid Planning Applications.
- 4.8 Separate pre-application meetings have generally taken place on a fortnightly basis with RBKC and LBHF officers to discuss design matters, with joint borough meetings held to discuss Site-wide or technical matters that relate the preparation of both Hybrid Applications when necessary. Workshops have been held with officers in the months prior to the Hybrid Applications submission to discuss more detailed matters associated with document and drawing drafting.
- 4.9 The meetings have covered a wide range of planning, design and technical topics. Joint meetings between RBKC, LBHF and GLA officers have taken place on a roughly bi-monthly basis to discuss strategic matters, with transport largely covered at joint RBKC, LBHF, GLA and TfL transport meetings to focus on specific matters related to modelling and transport-related strategy preparation. While not exhaustive, Table 3 below provides a summary of the key topics that have been discussed (often on more than one occasion) with officers.

Table 3: Summary of Pre-Application Meeting Topics

Design Matters	Technical Matters	Transport Matters
<ul style="list-style-type: none"> ▪ Strategic Masterplan Framework ▪ Landscape proposals – public realm and open space ▪ Development of illustrative masterplan ▪ Site optimisation, massing and density, including Townscape and Heritage considerations ▪ Microclimatic (including daylight, sunlight and wind considerations relevant to design development) ▪ Design Code drafting ▪ Parameter Plans drafting ▪ Detailed Component proposal reviews ▪ Inclusive Design, Safety and accessibility 	<ul style="list-style-type: none"> ▪ Housing strategy ▪ Viability ▪ EIA methodology and process ▪ Draft S106 Heads of Terms discussions ▪ Planning benefits ▪ Land use mix ▪ Commercial strategy ▪ Retail strategy ▪ Cultural strategy ▪ Sustainability and Energy Strategy (including Social Value; Economic Inclusion; Overheating; Circular Economy; Whole Lifecycle Carbon; Flood Risk, Drainage and Water Management considerations) ▪ Fire strategy ▪ Development Specification drafting ▪ Development Phasing ▪ CIL Phasing ▪ Temporary uses strategy 	<ul style="list-style-type: none"> ▪ Access, routes and movement Strategy ▪ Cycle routes ▪ Modelling process ▪ Highway improvements ▪ Station improvements ▪ Parking strategy

Statutory Consultee Engagement

4.10 Consultation has also taken place with other statutory consultees. Whilst the list below is not exhaustive, key stakeholders engaged with included:

- Historic England
- Royal Parks
- St. Cuthbert's Church
- Health and Safety Executive ("HSE")
- Network Rail
- London Underground Limited ("LUL")
- Mayor's Office for Policing and Crime ("MOPAC")
- Metropolitan Police Secured by Design Officers
- Environment Agency
- Thames Water
- National Air Traffic Services

4.11 Feedback from meetings with statutory consultees has been taken into account as part of the evolution of the Proposed Development.

4.12 For a full summary of the key feedback that has informed the design evolution of the Proposed Development, please refer to the submitted SCI, and Chapter 4 of the submitted DAS Volume 1: Outline Component, DAS Volume 2: RBKC Detailed Component and DAS Volume 3: LBHF Detailed Component, and summaries of pre-application engagement and feedback in relation to specific technical topics are included in submitted that technical documents that accompany the Hybrid Applications.

Design Review Panels

4.13 There were four separate DRPs to which the emerging Proposed Development was presented on multiple occasions during the pre-application process. Initial presentations focused on the emerging vision and aspirations for the Site, with subsequent sessions focusing on the evolving illustrative masterplan, Detailed Plot proposals and the emerging Design Code. Each of the Panels were supportive of the emerging Proposed Development and provided commentary which has influenced its design evolution.

GLA's London Review Panel ("LRP")

4.14 The project team presented draft proposals to the LRP at sessions in December 2021, May 2023, January 2023, June 2023, December 2023 and June 2024.

RBKC's Quality Review Panel ("QRP")

- 4.15 The project team presented the proposals to the QRP at sessions in November 2022, February 2023, July 2023, November 2023 and April 2024.

LBHF's Design Review Panel ("DRP")

- 4.16 The project team presented the proposals to the DRP at sessions in May 2023, July 2023, December 2023 and two further sessions in May 2024.

LBHF's Inclusive Design Review Panel ("IDRP")

- 4.17 LBHF also introduced an Inclusive Design Review Panel ("IDRP") in July 2023. The project team presented the proposals to the IDRP in July 2023, January 2024, May 2024 and June 2024.

Historic England's London Advisory Committee ("LAC")

- 4.18 In addition to the above, the emerging proposals were presented to Historic England's London Advisory Committee ("LAC") on 19th September 2023. This is Historic England's review panel which offers expert advice to staff on Historic England's functions relating to individual buildings, monuments, Conservation Areas, parks and gardens in London. It acts in a similar function to a Design Review Panel.

Pre-Application Stages

- 4.19 The pre-application process described above has broadly comprised the following three stages:

Stage 1: Framing Priorities (May 2020 – June 2022)

Outline Components

- 4.20 Stage 1 focused on the Site and context analysis, development of the design brief for the Site, and options testing in relation to site layout. Eight guiding Principles were developed iteratively through engagement events and community workshops, as well as through pre-application meetings.

Stage 2: Design development (June 2022 – February 2023)

Outline Components

- 4.21 Stage 2 formalised the principles of the Proposed Development into a concept illustrative masterplan layout that was shared with the public in Summer 2022. Engagement continued to feed into the emerging design. Public consultation took place on the draft masterplan in February 2023 as set out later on in paragraph 4.37. The Public Realm Inclusivity Panel ("PRIP") was launched and Conversation Corner, ECDC's dedicated consultation hub opened to help reach a wider range of people and attract feedback to shape the emerging designs. The emerging development proposals was presented at the first RBKC Development Forum.

Detailed Components

- 4.22 In mid-2022 the detailed plot architect selection process began. Once the architects had been selected in Autumn 2022, they began collaborating on the Detailed Component plots by testing plot design briefs.

Stage 3: Finalising the masterplan (February 2023 – now)

Outline Component

- 4.23 The outcome of Stage 2 resulted in five key moves which have informed the Proposed Development:

1. A larger Table Park, resulting in 20% more open space across the Site.
2. A reduction in density, resulting in 10% less development and a reduction in the number of buildings taller than 35 storeys through refining the heights strategy which included reducing heights within the Detailed Component plots.
3. Developing infrastructure for long term sustainability, including the development of an ambient loop network that will deliver zero operational carbon from the outset of the Earls Court Development. The system is designed to allow for the addition of new technologies and low or zero carbon energy sources as they are developed or become available. In this way, the Applicant is future-proofing the low carbon aspirations of the Proposed Development, whilst delivering energy security.
4. Maturing a sense of place, ECDC defined a strategy to attract creativity and innovation to Earls Court through a variety of cultural spaces and three innovation clusters targeted at clean and climate technologies, to bring new businesses and jobs to the area.
5. Creation of a familiar London street structure.

- 4.24 In Stage 3, Design Code Character Areas were refined, and plot designs were integrated into an Illustrative Masterplan. Public consultation on updated designs took place in November 2023 and March 2024. Detailed pre-application meetings and regular Design Review Panels took place during this time. The emerging development proposals were presented at a second RBKC Development Forum.

Detailed Component

- 4.25 Through 2023 the design concept for the Detailed Components was established and refined. In response to pre-application discussions and public consultation, the LBHF Detailed Component evolved to remove one of the tall buildings proposed at the time and include a single landmark building. The RBKC Detailed Component evolved by reducing the height of the proposed buildings from 32 and 27 storeys to 27 and 20 storeys.
- 4.26 The detailed plot teams focused on finalising the proposals with development of façade designs and further refinement of WB03 and WB04, alongside development of the proposed nursery in EC05 and resolving other technical matters.

Representations to Draft Planning Policy and Guidance Documents

4.27 The Applicant has also engaged in statutory consultation exercises for several emerging policy documents. The Applicant has submitted representations as a key stakeholder with substantial land interests in the two boroughs and London with a view to promoting development at the Site. This engagement is summarised as follows:

RBKC's New Local Plan Review

4.28 In March 2022, ECDC prepared representations in response to RBKC's draft Local Plan (Reg 18 version). This included a response on the land use assumptions, building heights and townscape, transport matters, the site-specific viability information, specific comments on the draft site allocation and other relevant policies.

4.29 In October 2022, RBKC consulted on its updated draft Local Plan (Reg 19 version) to which ECDC submitted representations to re-iterate its position in relation to relevant draft policies.

4.30 In February 2023, RBKC submitted their draft Local Plan to the inspectorate. The independent examination took place over the summer of 2023. ECDC took a key participatory role and prepared hearing statements with regard to Matter 4: Opportunity Area Sites and Allocations, Matter 8: Conservation and Design, Tall Buildings and Matter 10: Social Infrastructure, Transport and Viability.

4.31 In March 2024, ECDC submitted further representations to RBKC's proposed main modifications. Please also refer to Chapter 6 regarding the policy framework.

RBKC Earl's Court Placemaking Framework

4.32 Over the summer of 2022, design-focussed pre-application meetings were paused with RBKC while officers prepared the draft Earl's Court Placemaking Framework Supplementary Planning Document ("SPD"). During this time, ECDC and the project team met with RBKC officers for four collaborative workshops to agree the principles for the Site that were to be set out in the guidance document.

4.33 In October 2022, RBKC began public consultation on the draft Earl's Court Placemaking Framework. ECDC submitted supportive representations which supported the general approach to the draft framework, the vision and the priorities, but did highlight potential areas where physical or technical site constraints are such that absolute compliance with the draft framework would be challenging or where specific clarifications and corrections were required. In April 2023, it was adopted as an SPD.

Other Representations

4.34 ECDC has also submitted presentations to RBKC, LBHF and the GLA in relation to the following draft guidance documents:

- RBKC Community Housing SPD
- LBHF Affordable Workspace SPD
- LBHF Climate Change SPD
- Mayor of London's Purpose Built Student Accommodation LPG
- Mayor of London's Affordable Housing LPG
- Mayor of London's Development Viability LPG

Community Engagement

- 4.35 The ECDC, on behalf of the Applicant, is a locally based business and has been engaging with the local community in Earls Court on the vision and plans for the Site for over four years.
- 4.36 The community consultation has been exemplary and extensive in nature and has been at the core of the evolution of the Proposed Development. Every reasonable effort has been made to engage with as broad a range of people and groups as possible.
- 4.37 The details of the consultation undertaken which has taken place over eight phases are set out in the submitted SCI. The stages comprised the following:
- Spring and Summer 2020 (engagement phase one): The first of eight engagement and consultation phases began, focused on building a rich picture of the site and its history.
 - Summer 2021 (phase two): Three family fun days with a range of activities took place on and off the Site. Members of the project team were on hand to provide information and encourage attendees to provide feedback via a survey on the emerging proposals.
 - Autumn 2021 (phase three): Stakeholder tours informed the development of the emerging guiding principles for the Site.
 - Winter 2021 to Spring 2022 (phase four): Engagement on the vision to 'bring the wonder back' to Earls Court. Series of walks and workshops with local groups involving young people, older people and those with disabilities. Community masterplan workshops begin.
 - July 2022 (phase five): Launch of the first public consultation on the initial framework principles; masterplanning workshops for local residents and businesses. PRIP formally launched.
 - October 2022 (phase six): Conversation Corner opened to update people on feedback received to date.
 - February 2023 to November (phase seven): Draft Earls Court masterplan released for consultation. PRIP and community masterplan workshops continued.
 - November 2023 to May 2024 (phase eight): Updated masterplan and first Phase One proposals presented for consultation in November 2023. In March 2024, an updated exhibition of detailed proposals for Phase One and series of near neighbour workshops took place and in April 2024, community masterplan workshop on transport and movement and close neighbour workshops were held.
- 4.38 Further details of topic-based feedback received throughout the engagement process are set out in the submitted SCI and DAS Volume 1: Outline Component, DAS Volume 2: RBKC Detailed Component and DAS Volume 3: LBHF Detailed Component.

5. The Proposed Development

5.1 This Chapter provides an overview of the content and structure of the Proposed Development, including the format of the Hybrid Applications. It should also be read alongside the submitted Development Specification, which contains the principal description of development and Application User Guide, which provide further explanation of the composition and contents of the Hybrid Applications.

Descriptions of Development

5.2 The formal descriptions of development for each Hybrid Application are set out in the Development Specification and re-provided in Chapter 1 of this Statement for clarity. The two Hybrid Application proposals are referred to collectively as the “Proposed Development”.

Format of the Hybrid Applications

5.3 The Applicant has submitted two Hybrid Applications, one to each of RBKC and LBHF, with the red line boundary to delineate them drawn along the borough administrative boundary line. Land within the red line boundary to the east of the borough boundary line forms the RBKC Hybrid Application site and land to the west forms the LBHF Hybrid Application site. For completeness having regard to the guidance set out in the PPG and given a number of the application documents, including the ES, have been prepared to assess the Proposed Development (i.e. the contents of both Hybrid Applications), both application submissions are submitted in duplicate to each borough.

5.4 The planning applications are described as ‘Hybrid Applications’ because the Proposed Development is submitted in outline (the ‘Outline Component’), but with parts in each borough submitted in detail (the ‘Detailed Component’), making them ‘hybrid’ planning applications. This is not an uncommon approach for a development of this scale, which comprises multiple phases and will be developed over a number of years. This secures both a sitewide long-term vision for the Site, whilst demonstrating design quality and early delivery on-Site.

5.5 The RBKC Hybrid Application is formed of detailed development proposals in respect of plots EC05 and EC06 for which no matters are reserved (“RBKC Detailed Component”), and outline development proposals for the remainder of the RBKC Site, with all matters reserved (“RBKC Outline Component”). The RBKC Detailed Component and RBKC Outline Component together are referred to as the “RBKC Proposed Development”.

5.6 The LBHF Hybrid Application is formed of detailed development proposals in respect of plots WB03, WB04 and WB05 for which no matters are reserved (“LBHF Detailed

Component"), and outline development proposals for the remainder of the Site, with all matters reserved ("LBHF Outline Component"). LBHF Detailed Component and LBHF Outline Component together are referred to as the "LBHF Proposed Development".

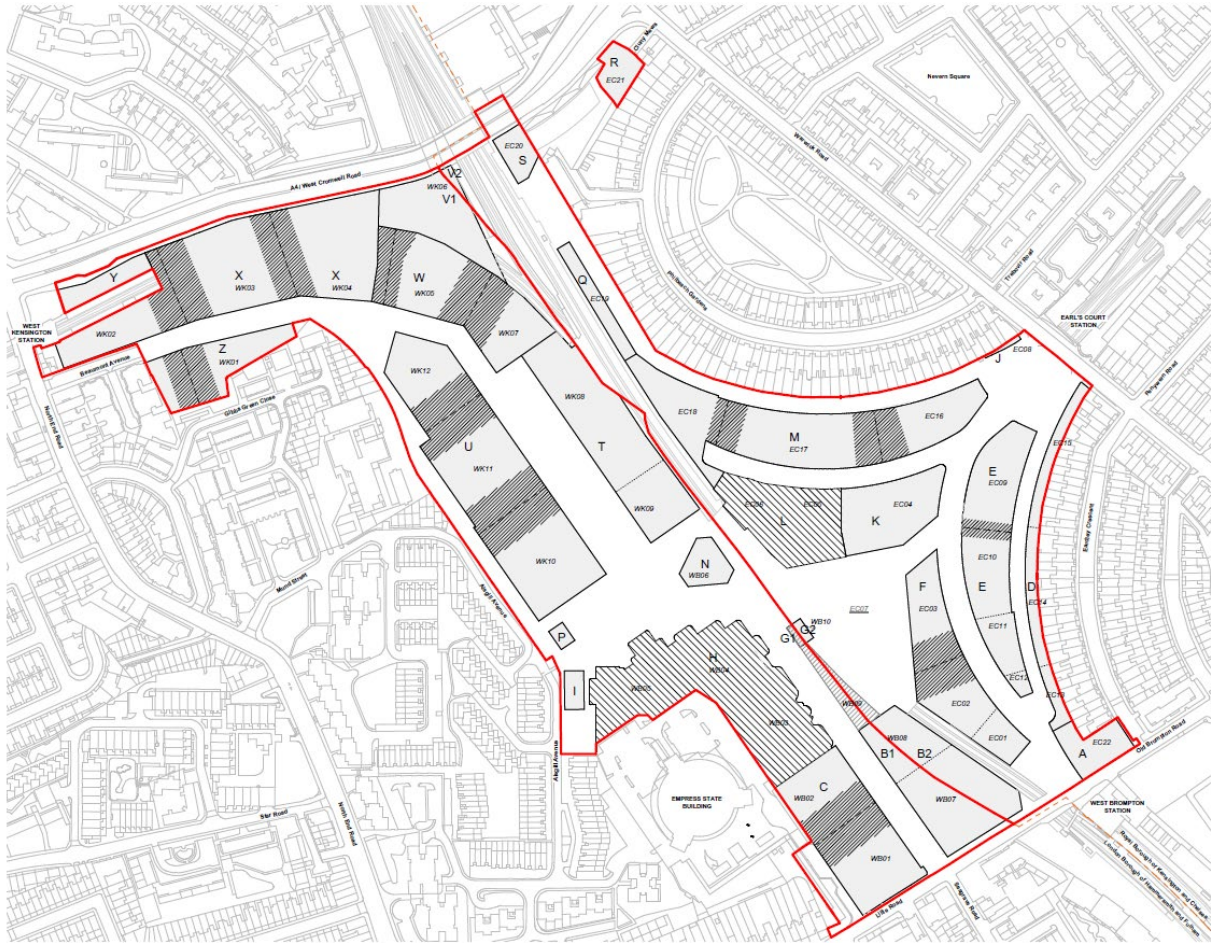


Figure 2: The Detailed Component Plots are shown as hatched and marked as Development Zones L and H

5.7 Matters that are reserved for the Outline Components are as follows:

- 'Access': details of the accessibility to and within the Site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.
- 'Layout': the way in which buildings, routes and open spaces within the Proposed Development are provided, situated and orientated in relation to each other and to buildings and spaces outside the Proposed Development.
- 'Scale': the parameters for the maximum height and minimum distances between the buildings within the Proposed Development in relation to its surroundings.
- 'Appearance': the aspects of a building or place within the Proposed Development which determine the visual impression the building or place makes, including the external built form of the Proposed Development, its architecture, materials, decoration, lighting, colour and other building features.

- 'Landscaping': the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the Site and the area in which it is situated and includes: (a) screening by fences, walls or other means of enclosure; (b) the planting of trees, hedges, shrubs, grass or other forms of soft landscaping; (c) the formation of banks, terraces, other earthworks or forms of hard landscaping; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features.

5.8 Information regarding the proposed floorspace quantum and land uses for the Outline Components and Detailed Components are set out below.

Application Plans and Documents Submitted for Approval

5.9 The Hybrid Applications seek approval of certain parameters of the RBKC and LBHF Outline Components set out in the following plans and documents that are collectively referred to as the "Control Documents":

- Parameter Plans: Plans which define the physical framework and principal spatial layout and arrangement for the Outline Components of the Proposed Development;
- Design Code: a document that provides design rules and guidance for any future applications for RMA;
- Development Specification: Defines and describes the Proposed Development and provides information in relation to:
 - The development for which outline planning permission is sought
 - The development for which detailed planning permission is sought
 - The documents, drawings and plans submitted for approval
 - The development content including the quantum of floorspace, units and bedrooms for each land use, public realm and parking.

5.10 The Control Documents define and guide the detailed design and development of the Outline Components through the submission of future applications for RMA.

5.11 The drawings, plans and documents submitted for approval in respect of the Detailed Components include:

- Detailed plans, sections and elevations providing details of access, appearance, landscaping, layout and scale, which include the following for each Plot (refer to the submitted Documents and Drawings Schedule for full details):
 - Proposed layout plans
 - Proposed sections
 - Proposed elevations
 - Landscape information (podium areas of WB03, WB04 and EC05, courtyard area of WB05 and landscaped area between Plots EC05 and EC06).

5.12 All other application drawings and documents not referred to in the sub-section above and listed in the Planning Application Documents and Drawing Schedule submitted with the

Hybrid Applications are provided for information. Fig 3. below provides a summary of the structure of the Hybrid Applications as a diagram.

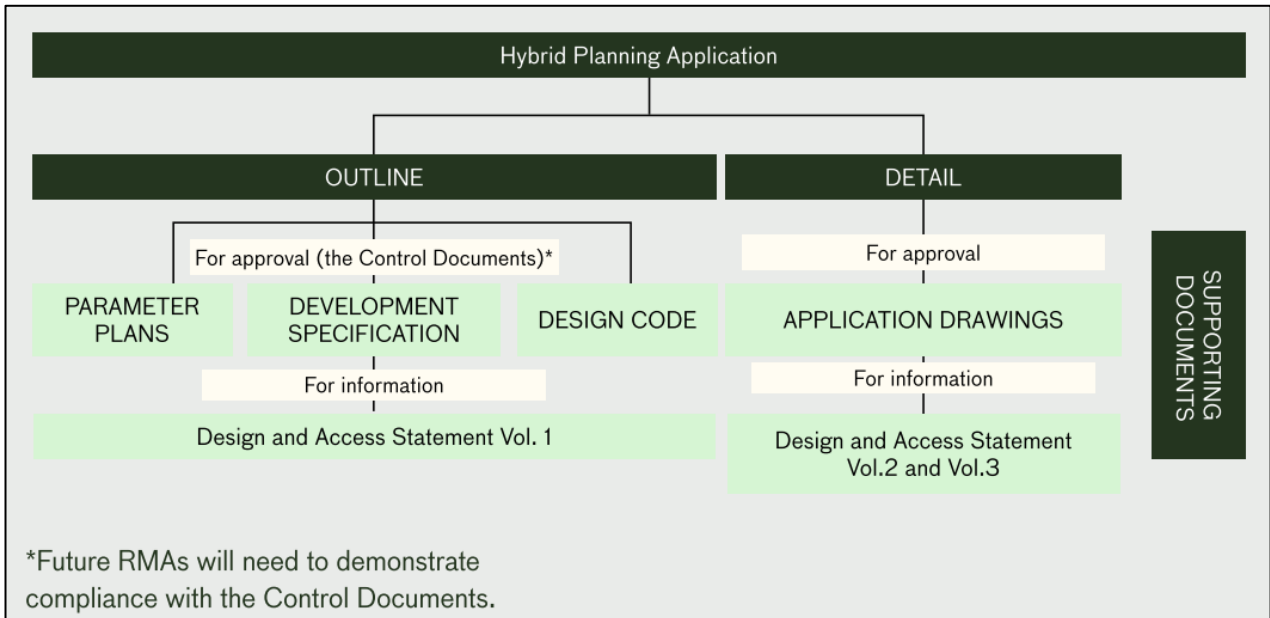


Figure 3: Format of each Hybrid Application

Development Zones and Development Plots

- 5.13 The Outline Component is divided into areas of Development Zones. Each Development Zone is then split into Development Plots (Development Plot boundaries are shown indicatively with limits of deviation on submitted Development Plots Parameter Plan ref. 005). The submitted Development Specification sets out the maximum total floorspace (in GEA sqm) and proposed land uses for each Development Zone.
- 5.14 Development Zones are generally identified in the Development Specification and on Parameter Plans by a letter only. Where the letter is accompanied by a number (e.g. Development Zone B1), it forms part of a Development Zone that straddles the borough boundary.

Amount of Proposed Development

- 5.15 This sub-section should be read in conjunction with the submitted Development Specification, which sets out the amount of development that is proposed under the Hybrid Applications. A summary is provided below.
- 5.16 The RBKC and LBHF Hybrid Applications seek planning permission for a combined maximum total of 710,519 sqm GEA, which comprises the following:

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

Application	Outline Component Area (sqm GEA)	Detailed Component Area (sqm GEA)	Overall Total (sqm GEA)
RBKC Hybrid Application	204,000	41,002	245,002
LBHF Hybrid Application	373,000	92,517	465,517
Overall Total	577,000	133,519	710,519

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

Table 5: RBKC Hybrid Application Floorspace and Land Use Table

Land use		Development Zone															Maximum Permitted Area (sqm GEA)
Land Use	Use Class	A	B	D	E	G	F	J	K	L	M	O	Q	R	S	V	
		RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	RBKC	
Residential	C3	7,000	0	3,000	20,000	0	43,000	0	34,000	<i>39,020</i>	19,000	0	4,000	3,000	0	2,000	170,000
PBSA	Sui Generis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,000	2,000
Co-living	Sui Generis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,000	2,000
Hotel	C1	0	0	0	0	0	0	0	0	0	12,000	0	0	0	0	0	12,000
Office /Research & Development	E(g)	0	23,000	2,000	16,000	0	41,000	0	0	<i>322</i>	12,000	0	4,000	0	3,000	0	95,000
Education	E (f) / F1(a)	0	0	0	0	0	22,000	0	0	0	12,000	0	0	0	0	0	20,000
Health / Older Persons Housing	C2	0	0	0	0	0	20,000	0	34,000	0	12,000	0	0	0	0	2,000	35,000
Retail / F+B / Flexible Commercial	E(a)/(b)/(c) / Sui Generis	1,000	4,000	1,000	5,000	200	6,000	100	2,000	<i>1,319</i>	2,000	3,000	0	0	0	0	11,000
Leisure	E(d) / Sui Generis	0	2,000	0	0	0	4,000	0	1,000	0	0	3,000	0	0	0	0	4,000
Culture	F / Sui Generis	1,000	3,000	0	1,000	200	4,000	100	2,000	0	2,000	3,000	0	0	0	0	3,000
Storage and Distribution	B8	0	0	0	0	0	0	0	0	0	0	3,000	0	0	3,000	0	6,000
Community / Social Infrastructure	F / E(e)/(f)/(g)	0	0	0	0	0	4,000	100	0	<i>340</i>	1,000	0	0	0	0	0	1,500
Ancillary (Logistics / Station Interface / Parking / General BoH)	various	0	1,000	0	4,000	100	10,000	0	6,000	0	4,000	7,000	0	0	0	0	30,000
DZ max cap (sqm)		7,000	27,000	5,000	40,000	300	50,000	200	37,000	<i>41,002</i>	32,000	4,500	4,000	2,100	3,000	2,000	N/A
Maximum Permitted Area (sqm GEA)																	245,002

Table 6: LBHF Hybrid Application Floorspace and Land Use Table

Land use		Development Zone														Maximum Permitted Area (sqm GEA)
Land Use	Use Class	B	C	G	H	I	N	P	T	U	V	W	X	Y	Z	
		1		1							1					
		LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	LBHF	
Residential	C3	0	22,000	0	54,298	0	26,000	0	42,000	64,000	10,000	40,000	24,000	0	10,000	290,000
PBSA	Sui Generis	0	0	0	31,116	0	0	0	39,000	0	9,000	0	0	0	0	68,000
Co-living	Sui Generis	0	20,000	0	0	0	0	0	39,000	0	9,000	16,000	0	0	0	48,000
Hotel	C1	0	20,000	0	0	0	0	0	0	0	0	0	0	0	0	20,000
Office /Research & Development	E(g)	25,000	45,000	0	0	0	0	0	3,000	1,000	0	24,000	80,000	0	0	175,000
Education	E (f) / F1(a)	0	20,000	0	0	0	0	0	0	0	0	22,000	0	0	0	25,000
Health / Older Persons Housing	C2	0	20,000	0	0	0	0	0	39,000	0	9,000	38,000	0	0	0	40,000
Retail / F+B / Flexible Commercial	E(a)/(b)/(c) / Sui Generis	4,000	4,000	100	3,072	0	2,000	200	5,000	4,000	0	2,000	5,000	0	1,000	14,000
Leisure	E(d) / Sui Generis	2,000	0	0	2,045	0	2,000	200	3,000	4,000	0	2,000	2,000	0	0	9,000
Culture	F / Sui Generis	3,000	2,000	100	0	0	3,000	200	3,000	4,000	0	2,000	2,000	0	1,000	7,000
Storage and Distribution	B8	0	0	0	0	0	0	0	0	0	5,000	0	5,000	0	0	10,000
Community / Social Infrastructure	F / E(e)/(f)/(g)	0	0	0	502	300	0	0	0	3,000	0	0	0	0	0	1,500
Ancillary (Station Interface / Parking / General BoH)	various	1,000	2,000	50	1,484	0	2,000	100	0	6,000	0	4,000	2,000	3,000	0	20,000
DZ max cap (sqm)		30,000	48,000	200	92,517	300	27,300	500	45,000	68,000	10,000	42,000	86,000	3,000	10,000	N/A
Maximum Permitted Area (sqm GEA)																465,517

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

- References to '**Residential (Use Class C3)**' relate to self-contained residential units, which may include housing for older people with an element of care provision, but which falls within Use Class C3 (as distinct from Use Class C2 Older Persons Housing)
- References to '**Purpose Built Student Accommodation (Sui Generis)**' relate to floorspace and bedrooms or occupation by students in higher education, which will be provided in addition to Class C3 residential units.
- References to '**Co-Living (Sui Generis)**' relate to Co-Living floorspace and units. Co-Living as a land use is defined for the purposes of the Hybrid Applications as non-self-contained housing units that fall within the Sui Generis Use Class so are distinct from Class C3 residential units referred to above, but are not restricted to occupation by specified groups, such as students or older people.
- References to '**Older Persons Housing (Use Class C2)**' relate to Older Persons Housing floorspace and units. Older Persons Housing as a land use is defined for the purposes of this Development Specification as self-contained housing units provided with care available and for occupation by people aged, for example, 55 or over that fall within Use Class C2 so are distinct from Class C3 residential units referred to above.
- References to '**Retail / F&B / Flexible Commercial**' relate to a range of types of retail, food and beverage and commercial uses that may fall within Use Classes E(a)/(b)/(c), although other uses retail-related uses, such as those associated with to cultural activities, may also come forward as part of the Proposed Development, although such uses may occupy floorspace under other Land Use types such as 'Culture'.
- References to '**Culture**' relate to a range of cultural uses that may fall within Use Classes E(a)/(b)/(c), F and/or Sui Generis, although other retail-related cultural uses may also come forward as part of the Proposed Development, although such uses may occupy floorspace under other Land Use types, such as Retail / Food and Beverage / Flexible Commercial.
- References to '**Leisure**' relate to a range of leisure uses that may fall within Use Class E(d), although other leisure-related uses, such as those associated with to retail or cultural activities, may also come forward as part of the Proposed Development and such uses may occupy floorspace under other Land Use types, such as 'Retail / F&B / Flexible Commercial or Culture'.
- Additional incidental and ancillary Retail / F&B / Flexible Commercial, Culture and / or Leisure uses could occur within the proposed public realm. However, any incidental use would be small scale and additional permanent structures would be subject to separate planning applications in future.
- References to '**Community / Social Infrastructure**' relate to uses that may fall within Use Classes E (e)/(f)/(g) and/or F), although other education-related community / social infrastructure uses may also come forward as part of the Proposed Development and such uses may occupy floorspace under other land use types such as 'Education'.

- References to **'Education'** relate to educational uses that may fall within Use Class F1 (a), although other community / social infrastructure-related education uses may also come forward as part of the Proposed Development and such uses may occupy floorspace under other Land Use types such as Community / Social Infrastructure.
- References to **'Health (Use Class C2)** relate to health-related uses such as..., as distinct from Older Persons Housing referred to above.
- References to **'Storage and Distribution (Use Class B8)** relate to any use within Class B8, including Warehouse, Storage, Logistics and Data Centre uses.
- References are made to **'Sui Generis'** uses in relation to various land types in Tables 4-7. Unless otherwise specified (e.g. in the case of Purpose Built Student Accommodation and Co-Living), these references could relate to any of the following: Bus Parking Facility, Theatre, Car Showroom, Nightclub, Drinking Establishment (with or without expanded food provision), Hot Food Takeaway, Live Music Performance Venue, Cinema, Concert Hall, Bingo Hall and Dance Hall uses. The precise mix and nature of these uses is not known at this stage in terms of their quantum or location in either Hybrid Application, but an allowance is included to allow the potential for them to come forward as part of applications for RMA, where they would be assessed in relation to their impacts and benefits prior to RMA approval being granted.
- References to **'Ancillary'** floorspace relate to interfaces with stations, plant (including substations), parking and general back of house areas that are either shared between multiple land uses or not otherwise included in floor area figures for land uses identified above.

5.18 For applicable land uses, maximum caps on units of accommodation are also set out in Table 7 below. 35% affordable housing (calculated as a proportion of Class C3 residential habitable rooms) and affordable PBSA bedrooms (calculated as a proportion of Sui Generis PBSA bedrooms) are proposed across the Proposed Development.

Land Use	RBKC Outline Component (Maximum)	RBKC Detailed Component	RBKC Total (Maximum)	LBHF Outline Component (Maximum)	LBHF Detailed Component	LBHF Total (Maximum)	Overall Total (Maximum)
Residential Units (Class C3)	1,090	310	1,400	2,038	462	2,500	3,900
Hotel Rooms (Class C1)	150	0	150	250	0	250	400
Older Persons Housing Units (Class C2)	100	0	150	150	0	150	300
Co-Living Units (Sui Generis)	40*	0	40	960	0	1,000	1,000
PBSA Bedrooms (Sui Generis)	30*	0	30	804*	696	1,500*	1,500

*Note – in RBKC Co-Living and PBSA can only happen in Development Zone V2 (a straddle Plot located to the west of the WLL) and maximum 1,500 PBSA bedrooms under LBHF Hybrid Application only to be reached in the event that no PBSA bedrooms come forward in Development Zone V2 under RBKC Hybrid Application.

5.19 It must be noted that the cumulative maximum areas listed by individual land use and Development Zone shown in Tables 5 and 6 above and within the Development Specification for the Outline Components would exceed the maximum amount of proposed floorspace sought by the Hybrid Applications (i.e. not all of it will come forward, it is proposed to allow flexibility of land uses to come forward within identified maximum floorspace caps by Development Zone and land use). While the maximum area for each land use and Development Zone represents an amount not to be exceeded, the RMA process will determine the areas and land use mix that comes forward as the Proposed Development is delivered.

5.20 These maximum caps are based on the parameters of development proposed on the submitted Parameter Plans and makes allowance for a mix of land uses to be delivered in most Development Zones, up to the maximum floorspace caps for the two Hybrid Applications and for areas of public realm and landscaping to be delivered.

RBKC Detailed Component

5.21 The RBKC Detailed Component comprises Development Zone L, which includes Development Plots EC05 and EC06.

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

Table 8: RBKC Detailed Component			
Land use	Use Class	Amount (sqm)	
		GEA	GIA
Residential	C3	39,021	35,257
Retail / Food and Beverage / Flexible Commercial	E(a)/(b)/(c)	1,319	1,229
Office / Research and Development	E(g)	322	268
Nursery	E(f)	340	307
Total		41,002	37,061

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

Table 9: RBKC Detailed Component Mix of homes	
Home Type	Number of Homes
Studio	7
1 bed	103
2 bed	150
3 bed	50
Total	310

Plot EC05

5.24 Plot EC05 is comprised of a 27-storey building and seven-storey mansion block alongside two three-storey townhouses with private entrances fronting Warwick Crescent. The plot provides a total of 202 homes with commercial spaces facing the Table Park currently proposed as food and beverage units. Homes are proposed in a range of sizes from studios to 3 beds.

Plot EC06

5.25 Plot EC06 is a single twenty storey building with commercial spaces (Class E(g)) located at Warwick Crescent level. The plot provides 108 homes ranging in size from 1 beds to 3 beds.

5.26 A 340 sqm (Class E (f) nursery facility is located within the ground floor of EC06, facing on to The Table, providing a key piece of social infrastructure for the new mixed-use neighbourhood.

5.27 The landscaping proposals for the RBKC Detailed Component, includes the public realm area between Plots EC05 and EC06 (described as Warwick Walk), the EC05 Residents courtyard at ground floor, the two residents roof terraces and the biodiverse roof areas on EC06.

LBHF Detailed Component

5.28 The LBHF Detailed Component comprises Development Zone H, which includes Development Plots WB03, WB04 and WB05.

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

Table 10: LBHF Detailed Component			
Land use	Use Class	Amount (sqm)	
		GEA	GIA
Residential	C3	54,298	49,327
Student	Sui Generis	31,116	28,527
Leisure	E(d) / Sui Generis	2,045	1,965
Retail / Food and Beverage / Flexible Commercial	E (a) / (b) / (c)	3,072	2,850
Community / Social Infrastructure	F2/E(g)	502	454

Ancillary	Sui Generis	1,484	1,398
Total		92,517	84,521

5.30 The LBHF Detailed Component includes the following proposed residential and PBSA unit mix:

Table 11: LBHF Detailed Component Mix of homes	
Home Type	Number of Homes
Studio	28
1 bed	183
2 bed	169
3 bed	82
Total	462

Table 12: LBHF Detailed Component Mix of PBSA	
Accommodation Type	Number of Rooms
Cluster	359
Studio	337
Total	696

Plot WB03

5.31 WB03 would provide purpose built student accommodation (PBSA). There would be a total of 696 units with a mix of studios and cluster flats with associated amenity spaces, and with 10% of all units wheelchair accessible.

5.32 Commercial floorspace would be provided at podium levels.

Plot WB04

5.33 WB04 provides 278 apartments and associated amenity space, with 10% of all homes M4(3) wheelchair adaptable.

5.34 Commercial floorspace would be provided at podium levels.

Plot WB05

- 5.35 WB05 provides 184 apartments and associated amenity space, with 10% of all homes M4(3) wheelchair adaptable.
- 5.36 A community facility and commercial floorspace is provided at lower levels. The community facilities would be a flexible space and provide a community café, education and other spaces available for use by the community. A fully accessible public toilet with changes space for people with a range of disabilities will be provided.
- 5.37 Together, the ground levels of WB03, 04 and 05 comprise of circa 5,200 sqm GIA of flexible commercial space and community space. There is opportunity for retail, F&B, culture and leisure, and circa 1,300 sqm GIA of ancillary space.
- 5.38 The landscaping proposal for the LBHF Detailed Component, is spread across a variety of spaces and levels, including the WB03 and WB04 podium and upper level terraces and the WB05 courtyard.

Need for Flexibility

- 5.39 Flexibility is a positive tool which is also essential to the successful delivery of a development of the complexity and scale of the Earls Court Development, which comprises a mix of uses that will be built out over a prolonged period of time and will encounter market fluctuations, full economic cycles and demand pressures. Flexibility between land uses that come forward within a particular Development Zone, within a framework of agreed parameters under a planning permission, enables the combination of land uses and quantum of development to respond to changing market conditions over time as applications for RMA come forward and reduces the need to apply for repeated amendments to the original OPP each time a change is needed due to parameters and/or floorspace caps being defined too rigidly many years in advance.
- 5.40 The inclusion of flexibility within outline and hybrid planning applications is an established practice, particularly on strategic scale, multi-phased developments in Opportunity Areas in London where it is an important part of ensuring the successful delivery of a long term development project.
- 5.41 Varying degrees of land use flexibility are proposed for most Development Zones (or Plots), but a limited number of 'Flexible' Zones (such as Zones E, F and M in RBKC and Zones C, T and V in LBHF) are proposed in the Outline Components with potential for different predominant uses (e.g. residential or commercial) to come forward within a Plot at RMA stage. Development in Flexible Zones, where the different potential land use scenarios could come forward, are allowed for in the submitted Design Code within more flexible parameter envelopes than for other Plots where proposed land uses would not result in materially different building sizes or configurations. Examples of different ways in which development could come forward in Flexible Zones, within approved parameters, are illustrated for information in the submitted DAS Volume 1: Outline Component.

5.42 The delivery of floorspace and mix of land uses that comes forward in each Development Zone will be controlled by the Control Documents and appropriately worded planning conditions and S106 obligations. This will be monitored throughout the RMA application process through the submission of Reconciliation Statements (a template for which is submitted for information as part of the Hybrid Applications), that will track the amount of floorspace, the use including number and type of residential units, public realm and landscaping provision as each RMA is progressed alongside confirmation of compliance with the Control Documents.

Landscaping and Public Realm

5.43 The Proposed Development includes approximately 8 ha of public realm, which will comprise the space between buildings that is publicly accessible, including streets, squares, and public open spaces. The following main areas of public open space include:

- Table Park
- The Cascades
- Aisgill Gardens
- Warwick Square
- West Brompton Square
- Lillie Sidings

5.44 Further information in relation to areas of proposed public realm is provided on the submitted Development Zones, Maximum Building Lines and Public Realm Parameter Plan (ref. 004), within the Design Code and illustrated in the DAS Volume 1: Outline Component, DAS Volume 2: RBKC Detailed Component and DAS Volume 3: LBHF Detailed Component.

Play space

5.45 The Proposed Development will provide play space calculated in line with the play space standards set out in the Mayor of London’s 2012 Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance (‘SPG’). Calculations will be based on 10 sqm of playspace per child that is expected to occupy the development, taking into account residential size and tenures.

5.46 Further information regarding the calculation and location of play space provision is provided in the submitted Design Code and illustrated in the DAS Volume 1: Outline Component, DAS Volume 2: RBKC Detailed Component and DAS Volume 3: LBHF Detailed Component.

5.47 The RBKC Detailed Component will provide play space as follows:

Table 13: RBKC Detailed Component play space quantum	
Age Group	Area Proposed (sqm)
Aged 0-4	210

Aged 5-11	0
Aged 12-18	0
Total	210

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

Table 14: LBHF Detailed Component play space quantum	
Age Group	Area Proposed (sqm)
Aged 0-4	618
Aged 5-11	0
Aged 12-18	0
Total	618

5.49 The remaining play provision for these Plots will be submitted for approval when reserved matters comes forwards for the adjoining public realm and landscaping to these Development Plots.

5.50 The final location and details of the remaining play space for the Detailed Components, will be confirmed at Reserved Matters stage.

5.51 The Proposed Development will meet the need for play space through the provision of a variety of different play environments throughout the Site.

Car Parking

5.52 A Transport Assessment and Framework Travel Plan have been submitted in support of the Hybrid Applications. They set out a strategy for promoting sustainable modes of transport during the life of the Proposed Development and reducing the reliance on car use in the future. The provision of car parking in the Proposed Development will be reviewed in accordance with the Travel Plan as the Proposed Development evolves.

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

Outline Components

Table 15: Maximum Car Parking Provision				
Type	Sub-category	RBKC	LBHF	Maximum
Residential	-	42	75	119
Non-residential	-	9	17	26
Other	Visitor	15	20	35
	Car Club	5	20	25
Total		71	132	205

RBKC Detailed Component

- Residential (Blue Badge Holder): 11 spaces
- Non-Residential: 1 space
- Total: 12 spaces

LBHF Detailed Component

- Residential (Blue Badge Holder): 15 spaces
- Non-Residential: 1 spaces
- Total: 16 spaces

Cycle Parking

- 5.54 Cycle parking for the Detailed and Outline Components for the Hybrid Applications will be provided in accordance with the Minimum Cycle Parking Standards set out within the London Plan (2021).
- 5.55 The final number of cycle parking spaces for the Outline Components will be determined at RMA stage when the final residential unit mix and non-residential floorspace proposed by each RMA are approved. However, the maximum number of cycle parking spaces that the Proposed Development (including the Outline and Detailed Components) would provide based on the maximum mix of proposed land uses comprises the following:

Table 16: Maximum Cycle Parking Provision				
Type	Sub-category	RBKC	LBHF	Maximum
Residential	Long Stay	2,551	4,544	7,095
	Short Stay	38	64	102

Table 16: Maximum Cycle Parking Provision				
Type	Sub-category	RBKC	LBHF	Maximum
Non-residential	Long Stay	971	2,320	3,291
	Short Stay	305	410	715
Total	Long Stay	3,522	6,864	10,386
	Short Stay	343	474	817
	All	3,865	7,338	11,203

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

Table 17: RBKC Detailed Component Cycle Parking Provision					
Land use	Land use classification	Quantum	Metric	Cycle Parking	
				Long Stay (rounded)	Short Stay (rounded)
Residential	C3	310	Homes	562	10
Food and Beverage	E(a)/(b)/(c)	1,309	sqm GEA	8	66
Estate Management	E(g)(i)	353	sqm GEA	5	1
Social Infrastructure	F2	343	sqm GEA	3	4
Total				578	81

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

Table 18: LBHF Detailed Component Proposed Residential Cycle Parking Spaces			
Dwelling Type	Number of Units	Cycle Parking	
		Long-Stay	Short-Stay
1 bed 1 person (inc. PBSA)	724	550	22
1 bed 2 person	183	275	
2+ bed	251	502	

Total	1,158	1,327	22
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Table 19: LBHF Detailed Component Proposed Non-Residential Cycle Parking Spaces

Dwelling Type	GEA (sqm)	Cycle Parking	
		Long-Stay	Short-Stay
Retail / Food and Beverage / Flexible Commercial	3,072	11	59
Leisure	2,045	4	21
Community / Social Infrastructure	502	2	5
Total		17	85

Highway Works

5.58 Details of proposed highway works are set out in the Transport Assessment and will be secured through relevant section 106 obligations including for the following:

- Carriageway and footway realignments at entrance points to the Site;
- Contributions towards off-site cycle improvements, pedestrian crossings and junction improvements;
- Public realm improvements to Aisgill Avenue

Infrastructure and Enabling Works

5.59 The Proposed Development will include infrastructure and enabling works. This will include various packages of works to prepare the Site for development and to enable the delivery of the Proposed Development. It will also involve the provision of railway infrastructure, including a Road to Rail Vehicle (“RRV”) facility which would be delivered in the All Phases development scenario only as part of the redevelopment of LBD land.

The Illustrative Masterplan

5.60 The Illustrative Masterplan represents one way in which the Proposed Development could come forward within the parameters and rules set by the Control Documents.

5.61 It has also been used in some of the technical assessment documents (e.g. Biodiversity Net Gain Assessment) as the basis for an indicative assessment scenario to illustrate that certain minimums or targets can be achieved within the parameters of the Proposed Development. The Illustrative Masterplan scenario can also provide a comparison against the ‘worst case’ scenario assessments required for the technical assessments within the

ES to provide some context to likely impacts where maximum developments forming the basis of the worst case assessment are unlikely to be built out in full.

- 5.62 The role of the Illustrative Masterplan throughout the pre-application process has been as a vehicle for continual testing and discussion with stakeholders, play an important role in the formation of the seven proposed Character Areas and informing the preparation of the submitted Development Specification, Parameter Plans and the Design Code. The Illustrative Masterplan is described in further detail within the submitted Illustrative Masterplan document.
- 5.63 The submitted Illustrative Masterplan document and DAS Volume 1: Outline Component include further information relating to the Illustrative Masterplan in relation to the principles that underpin it and how it has evolved. In addition, the DAS Volume 1: Outline Component includes alternative illustrations, images and plot studies to consider different ways in which the Control Documents could be interpreted in terms of use, built form, architectural expression and public realm / landscape design.
- 5.64 A set of Illustrative townscape views, which are based on the alternative illustrative building designs included in the DAS Volume 1: Outline Component are provided as an appendix to the submitted Townscape Assessment to allow a contextual assessment to be undertaken.
- 5.65 In summary, the Illustrative Masterplan shows a land use allocation which equates to approximately a 60:40 ratio of residential vs non-residential uses and indicatively provides circa 3,100 homes and circa 220,000sqm GEA of commercial floorspace.
- 5.66 This Planning Statement and submitted assessment documents primarily assess the Proposed Development as set out in the Control Documents rather than the Illustrative Masterplan, although as is noted above, the Illustrative Masterplan has been used as a tool to contextualise assessment findings where relevant.

Phasing

- 5.67 The Proposed Development is currently anticipated to be delivered in eight main phases and over an estimated programme of approximately 19 years. The eight main phases encompass the full build out of the Proposed Development. The indicative development programme is based on the assumption that planning permission is secured in Q3 2025. Elements of infrastructure works are expected to commence prior to Q3 2025. Where applicable, separate applications have already been submitted or may be submitted for these works as described in Chapter 5 and the Infrastructure Works section of the submitted ES. The impacts of these works have been considered as part of the EIA and in other relevant application documents for completeness.
- 5.68 No significant delay is anticipated between the phases. However, realising vacant possession of the LBD is complex and whilst an indicative programme has been agreed with London Underground Limited (“LUL”), it is subject to ongoing review, detailed preparation and design, and additional consents. It may change and could delay vacant possession beyond the timescales currently anticipated.

- 5.69 Due to the above, the Hybrid Applications consider and assess two different scenarios. These are:
1. All Phases: comprising the entirety of the Proposed Development. This is currently anticipated for completion by 2043.
 2. Early Phases: Phases 1-4 (the 'Early Phases') are completed, but the Depot remains operational and is delivered to a different programme from that currently anticipated in the All Phases scenario.
- 5.70 Therefore, for the purpose of the indicative development programme, the Proposed Development works are anticipated to be undertaken over 13 years for the Early Phases (completion targeted for Q2 2037) and 19 years for the All Phases (completion Q2 2043). First residential occupation is expected to take place in 2030.
- 5.71 This Planning Statement considers each of these scenarios, where relevant, in Chapter 7 onwards. For further information in relation to phasing and development scenarios, refer to the submitted ES, Indicative Phasing Strategy and other relevant application documents.

Future Applications

Earls Court Station Exit 3

- 5.72 The RBKC Hybrid Application Proposed Development and Development Zones have been arranged to exclude and therefore safeguard the currently disused Grade II listed Earls Court station exit (that lies below ground in the eastern part of the RBKC Hybrid Application Site next to Warwick Road) to allow for its potential future use. Applications for planning permission and Listed Building Consent ("LBC") would be prepared and submitted to RBKC in the future should proposals for its re-use and / or alteration come forward in the future.

LBD Operations Relocation

- 5.73 LBD is an operational TfL and LuL training and maintenance facility. TfL is committed to enabling LBD to be redeveloped as part of the Proposed Development. To allow redevelopment of LBD land to take place, which comprises Phases 5-8 of the Proposed Development, the existing operations on the land will need to be relocated off-Site.
- 5.74 TfL has worked with the Applicant to support the preparation of the Hybrid Applications, including entering into a conditional land sale agreement with the Applicant in 2022 for the sale of the land to the Applicant on a long lease, which would be released for redevelopment upon the grant of planning permission for the Hybrid Applications and achievement of vacant possession.
- 5.75 TfL has begun the complex process of preparing a vacant possession strategy (including initial feasibility that has demonstrated that the relocation of existing operations is feasible) and identifying potential off-Site locations for its existing operations.

- 5.76 The vacant possession, relocation and construction phase is currently anticipated to take a number of years. The indicative phasing strategy for the Proposed Development has been carefully considered to take this into account and has designed interim conditions to account for delays to the relocation programme should this take place.
- 5.77 Following initial feasibility considerations to identify operationally suitable receiver sites and demonstrate that relocation of the existing operations on site is feasible, a preliminary strategy is outlined within the submitted Lillie Bridge Depot Preliminary Relocation Strategy. This document identifies the next steps required, including preparation of the anticipated receiver sites for operations which require relocation, for which TfL will approach the relevant LPAs regarding any necessary consents.
- 5.78 Further information in relation to the relocation of LBD operations is provided in the submitted Lillie Bridge Depot Preliminary Relocation Strategy.

Station Mitigation measures

- 5.79 Mitigation measures proposed to West Brompton Station and West Kensington Station will, if required, form separate applications or approvals.

Early Infrastructure Works

- 5.80 Packages of early infrastructure works may be required and will, where works are expected to be carried out prior to the grant of the Hybrid Applications, be applied for under separate applications for relevant approvals and consents. However, all infrastructure works, including any potential early infrastructure works, have been included and assessed in the ES accompanying the Hybrid Applications.

6. Planning Policy Framework and Overview

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 6.2. The purpose of this Chapter is to identify the Development Plan as it relates to each Hybrid Planning Application and relevant policies to be considered. An assessment of the Proposed Development in the context of the relevant policies is included in Chapter 7.
- 6.3. The Development Plan for the RBKC Site comprises the following:
- London Plan (2021); and
 - RBKC Local Plan (2019) (to be replaced by the 2024 RBKC Local Plan, which is referred to under the 'Emerging Planning Policy' section at the end of this Chapter).
- 6.4. The Development Plan for the LBHF Site comprises the following:
- London Plan (2021); and
 - LBHF Local Plan (2018).
- 6.5. In addition to the Development Plan, regard has been had to the National Planning Policy Framework ("NPPF") (2023).
- 6.6. The NPPF (most recently updated in December 2023) sets out the Government's planning policies for England. These policies articulate the Government's vision for sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.7. The NPPF states that the purpose of the planning system is to advise and guide on best practice development which is as sustainable as possible. The NPPF stresses that the goal of sustainable development should not hinder or prevent future development. The overarching national planning policy theme is that of sustainable development. The Government has advised that this should be a central theme for plan making and decision taking.

Regional Policy

London Plan (2021)

- 6.8. The London Plan (2021) provides the spatial development strategy for Greater London. It sets out a strategic policy framework for development in London.

Local Policy (RBKC)

RBKC Local Plan (2019)

- 6.9. The RBKC Local Plan (2019) was adopted in September 2019. It sets out the spatial policies, development management policies and site allocations to guide and manage development in RBKC.

Local Policy (LBHF)

LBHF Local Plan (2018)

- 6.10. The LBHF Local Plan (2018) was adopted in February 2018. It sets out the spatial policies, development management policies and site allocations to guide and manage development in LBHF.

Supplementary Guidance

- 6.11. Planning guidance produced by the Government, the Mayor of London, RBKC and LBHF is also of relevance to the Hybrid Applications. The following guidance does not form part of the Development Plan against which the Proposed Development is assessed but has been taken into consideration where relevant.

National Guidance

- 6.12. The Government has published national Planning Practice Guidance (“PPG”), which is updated periodically. This is referred to where relevant to the Proposed Development in Chapter 7 below.
- 6.13. The National Design Guide, 2021, which illustrates how well designed places that are beautiful, enduring and successful can be achieved in practice through the ten characteristics of good design.
- 6.14. The National Model Design Code (NMDC), 2021, provides detailed guidance on the production of design codes, guides and policies to promote successful design. The NMDC provides a toolkit to guide local authorities on the design parameters and issues that need to be considered and tailored to their own context, whilst also placing an expectation on involving communities throughout design code preparation.

Regional Guidance

- 6.15. The Mayor of London has published a suite adopted Supplementary Planning Guidance (SPG) documents. Of relevance to this Site and the Hybrid Applications are the following adopted documents:
- Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
 - Accessible London: Achieving an Inclusive Environment SPG (2014)
 - Shaping Neighbourhoods: Character and Context SPG (2014)
 - Sustainable Design and Construction SPG (2014)

- Housing SPG (2016)
- Affordable Housing Viability SPG (2017)
- Energy Planning Guidance (2022)
- Sustainable Transport, Walking and Cycling LPG (2022)
- 'Be seen' Energy Monitoring Guidance LPG (2022)
- Whole Life-Cycle Carbon Assessments LPG (2022)
- Circular Economy Statement LPG (2022)
- Characterisation and Growth Strategies LPG (2023)
- Housing Design Standards Local Plan Guidance ('LPG') (2023)
- Urban Greening Factor LPG (2023)
- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Air Quality Neutral LPG (2023)
- Air Quality Positive LPG (2023)

6.16. The GLA has also produced relevant guidance that is currently published in draft (date of draft publication for consultation shown in brackets):

- Fire Safety LPG (February 2022)
- Affordable Housing LPG (May 2023)
- Development Viability LPG (May 2023)
- Purpose-Built Student Accommodation LPG (October 2023)

RBKC

6.17. RBKC has published the following Supplementary Planning Guidance (SPG) documents. Of relevance to this Site and hybrid planning application are the following adopted documents:

- Artists' Studios SPG (2002)
- Elderly Persons' Accommodation SPG (2004)
- Public Art SPG (2008)
- Designing Out Crime SPD (2008)
- Noise SPD (2009)
- Air Quality SPD (2009)
- Access Design Guide SPD (2010)
- Trees and Development SPD (2010)
- Building Height SPD (2010)
- Shopfront Design Guidelines SPD (2011)
- Basements SPD (2016)
- Transport and Streets SPD (2016)
- Planning Contributions SPD (2019)
- Community Housing SPD (2020)
- Greening SPD (2021)
- Earl's Court Placemaking Framework SPD (2023)

LBHF

6.18. LBHF has published several adopted Supplementary Planning Documents ("SPD") documents, in addition to an Industrial Strategy titled Economic Growth for Everyone (2017) which sets out the Council's ambition to boost economic growth across the borough. Of relevance to this Site and LBHF Hybrid Application are the following adopted documents:

- Planning Guidance SPD (2018)
- Affordable Workspace SPD (March 2022)
- Railway Arches SPD (March 2022)

Site Designations

6.19. The Site has the following policy designations at a regional and local level:

London Plan

6.20. The Earls Court and West Kensington Opportunity Area (“ECWKOA”), of which the Site forms part of, identifies the area as having an indicative capacity of 6,500 new homes and 5,000 jobs.

RBKC Local Plan

6.21. Site designations:

- Earl's Court and West Kensington Opportunity Area
- Draft Local Plan Site Allocation SA2 Earl's Court Exhibition Centre
- Sites of Importance for Nature Conservation
- Area of Open Space Deficiency
- Flood Risk Zone 1/2/3

6.22. Adopted RBKC Local Plan Site Allocation CA4, allocates development on the Site to deliver:

- A minimum of 900 (C3) homes
- A minimum of 10,000sq.m of office floor space
- Retail and other uses to serve the day-to-day needs of the new development
- A significant cultural facility to retain Earl's Court's long standing brand as an important cultural destination
- Other non-residential uses required to deliver a sustainable and balanced mixed-use development, such as hotel and leisure uses
- Social and community uses
- On-site waste management facilities
- On-site renewable energy sources

Relevant Borough Strategies

6.23. The following borough strategy documents have been published by RBKC and LBHF. While these are not planning policy or guidance document, they are relevant to the Proposed Development as they seek to help drive economic growth in either borough:

- RBKC Live, Work and Learn – Our Plan for a Successful Economy (2019)
- LBHF Economic Growth for Everyone – An Industrial Strategy for Everyone (2017) (“LBHF Industrial Strategy”)

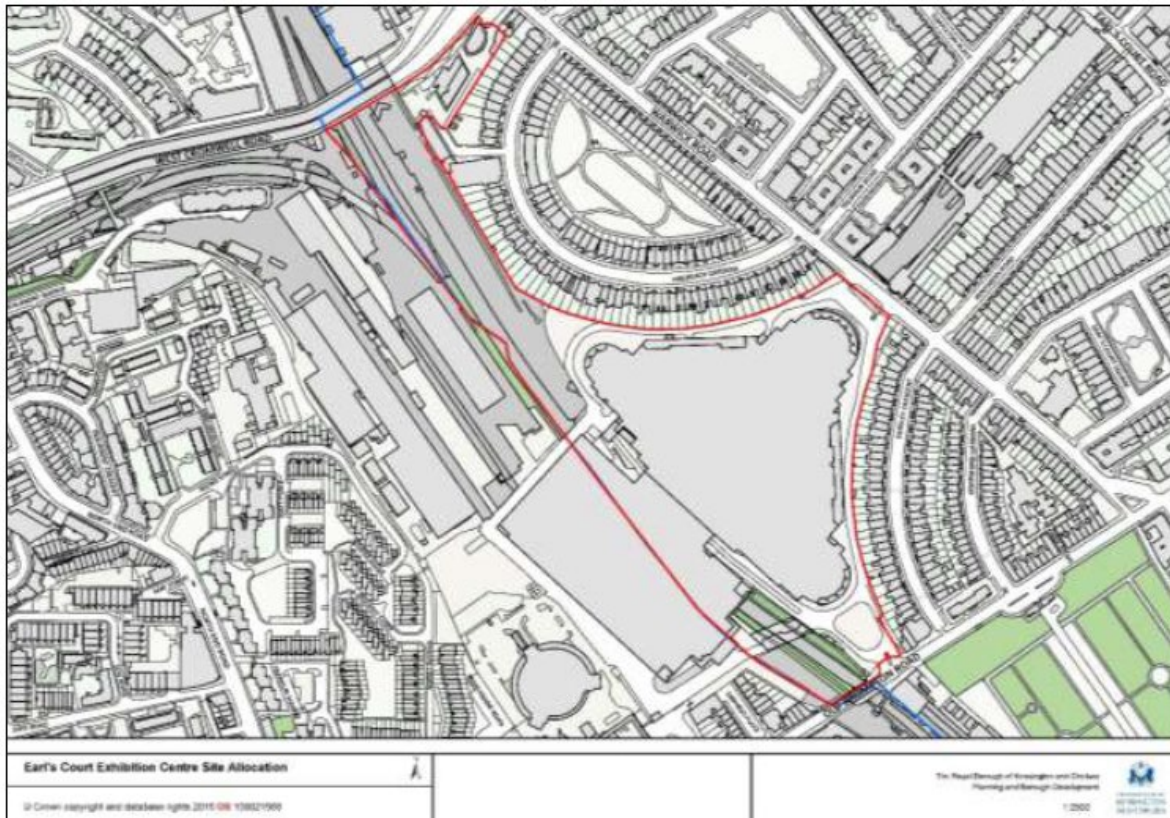


Figure 4: Adopted RBKC Local Plan Site Allocation CA4

6.24. Adopted RBKC Earls Court Opportunity Area Placemaking Framework (2023) sets out RBKC's vision for the Site and identifies four key priorities:

- Priority 1: Public Realm First
 - Landscape before buildings
 - Working with natural systems and the inherited landscape
 - Open space for everyone
- Priority 2: Exemplar of environmental sustainability
 - Vision for sustainability
 - Site-wide strategy for managing environmental impacts
- Priority 3: Part of the city
 - Completing Earls Court
 - Convenient and appealing connections
 - Sensitive Integration
- Priority 4: Varied and rich urban life
 - A place for people to settle
 - The value of active uses
 - Putting Earls Court back on London's cultural map

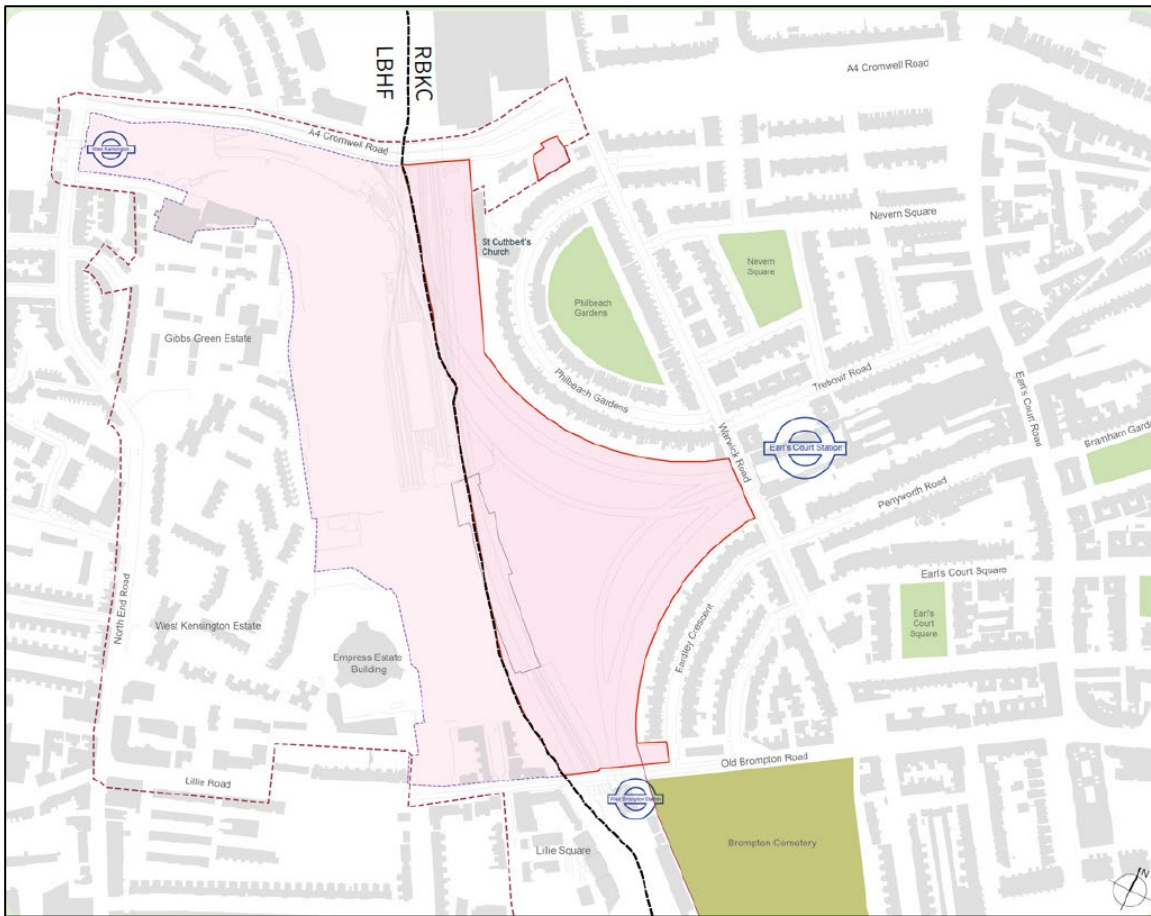


Figure 5: Adopted RBKC Earls Court Opportunity Area Placemaking Framework

LBHF Local Plan

6.25. Site designations:

- Earls Court and West Kensington Opportunity Area
- Fulham Regeneration Area
- Nature Conservation: Rail Side Habitats
- Green Corridors
- Flood Risk Zone 1/2/3
- Barons Court Conservation Area (part)

6.26. Strategic Regeneration Area: FRA1 Earls Court and West Kensington Opportunity Area, of which the site forms a part of, identifies development proposals to contribute to:

- Providing a mix of land uses, including housing, employment, hotels, leisure and associated facilities, retail and cultural facilities
- Providing adequate social, physical, environmental and transport infrastructure to support the needs of the area as a whole
- Providing green corridors and public open spaces including the provision of a centrally located local park of at least 2 hectares
- Identifies the wider ECWKO (which the Site forms part of) as having the ability to deliver 6,500 homes and 8,500 jobs

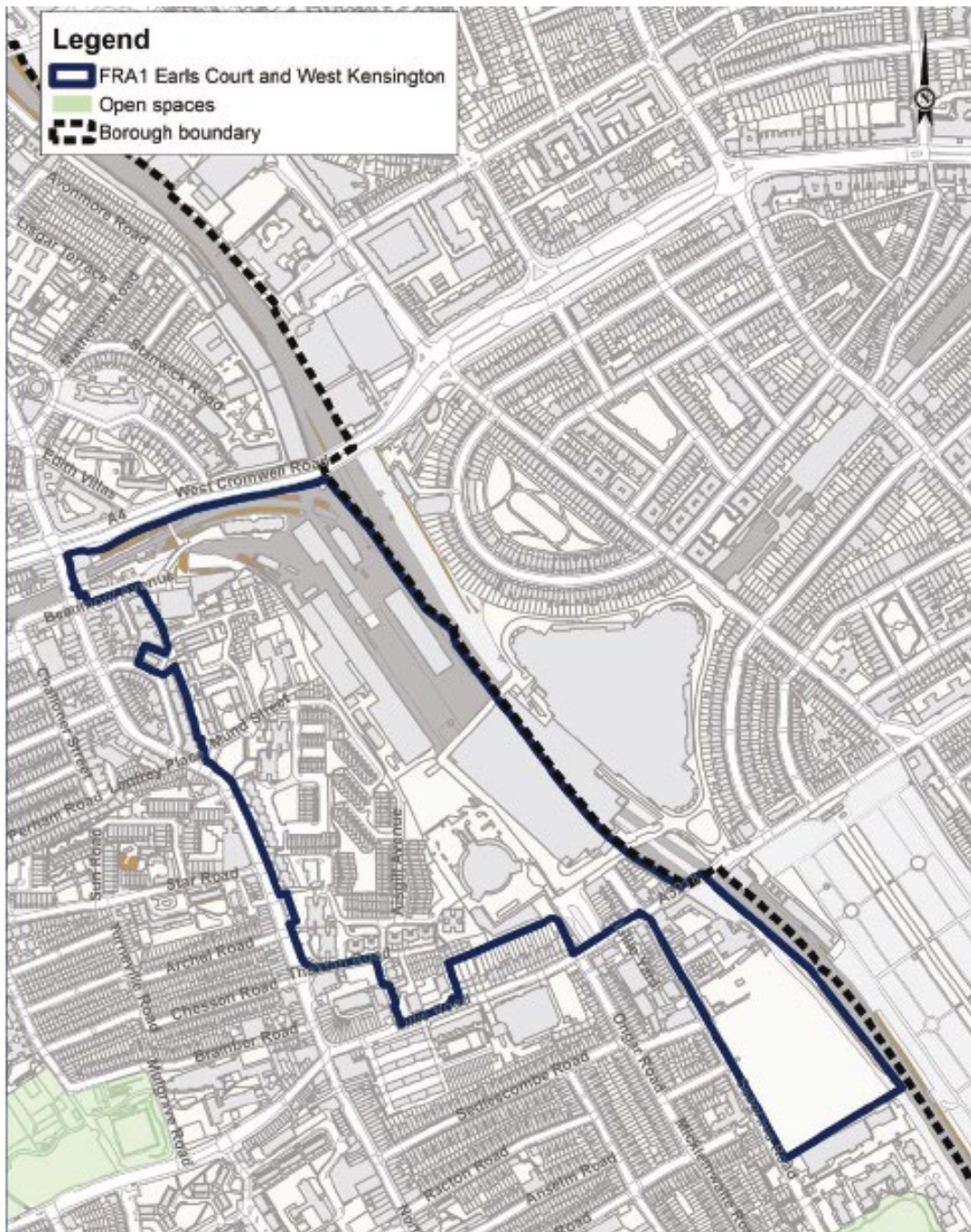


Figure 6: Strategic Regeneration Area: FRA1 Earls Court and West Kensington Opportunity Area

Emerging Planning Policy

RBKC New Local Plan Review (“NLPR”)

6.27. Since 2020, RBKC has prepared and consulted on a New Local Plan Review (referred to hereafter as “NLPR” or “draft RBKC Local Plan”). The Applicant has submitted representations at each consultation stage. In the summer of 2023 an independent examination was held by a Planning Inspector on behalf of the Secretary of State for which ECDC, on behalf of the Applicant, submitted Hearing Statements, attended the Examination in Public, and contributed to the round table discussions.

6.28. Main Modifications were published in January 2024 and on 5th July 2024. The draft RBKC Local Plan was then adopted by RBKC at its Full Council meeting on 24th July 2024 (to be known as the RBKC '2024 Local Plan') and replaces the 2019 RBKC Local Plan. This Planning Statement and the other submitted RBKC Hybrid Application documents have been written on the basis that the policies of the draft RBKC Local Plan (as it is referred to throughout the RBKC Hybrid Application documents) carry material weight in the consideration of the RBKC Hybrid Application given the stage these policies had reached while the documents were being prepared.

Emerging Site Allocation – SA2 Earl's Court Exhibition Centre

6.29. Within the draft RBKC Local Plan, the Site is allocated to deliver an optimised residential-led mixed use development, with aspirations to deliver:

- Around 40,000 sqm or more of non-residential floorspace, of which a minimum 20,000 sqm should be for Class E(g) offices or research and development or light industrial
- Retail and other uses to serve the day-to-day needs of the Site
- Around 1,050 or more homes (C3)
- Provision of a facility or facilities of a commensurate scale and quality to enable the creation and delivery of cultural activity of international quality
- Retail and other uses within Class E as part of a new Neighbourhood Centre
- Other non-residential uses required to deliver a sustainable and balanced mixed-use development
- Social and community uses to meet the needs of new residents and to improve health, social and cultural well-being for all sections of the community
- Interlinked public green spaces
- New public park measuring around 2 ha
- Early-years education facility

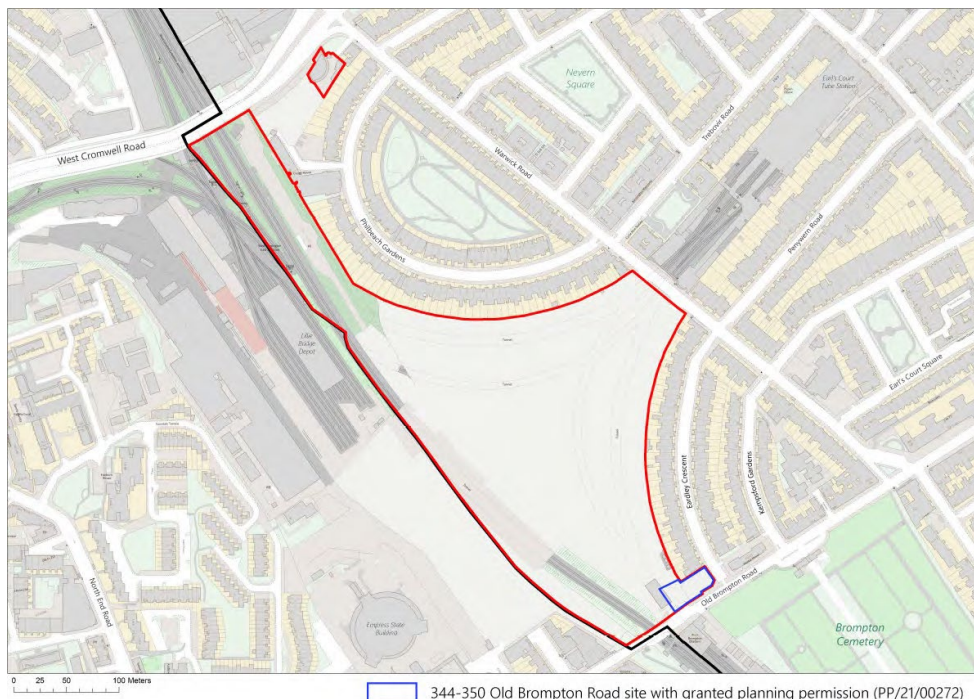


Figure 7: RBKC's NLRP emerging site allocation – SA2 Earl's Court Exhibition Centre

7. Assessment of Proposed Development

Introduction

7.1. This Chapter assesses the Proposed Development in the context of national, regional and local planning policy and guidance relevant to the determination of both Hybrid Planning Applications.

7.2. The Proposed Development is assessed as a whole and by topic within this Chapter. The assessment for each topic has regard to key national, London Plan, RBKC and LBHF planning policy and guidance. Where relevant under each topic heading, additional assessment of the Detailed Components is provided to reflect the greater level of detail submitted as part of the Hybrid Planning Applications. Additional considerations related to the Early Phases Development Scenario are also considered where relevant to a particular assessment topic.

7.3. The planning topics covered in this Section comprise the following:

Section / Sub-Section Title	Page Number
Principle of Development	58
Land Use <ul style="list-style-type: none"> • Housing, including Affordable Housing, Viability and Older Persons Housing • Purpose-Built Student Accommodation (“PBSA”) • Co-living / Shared Living • Workspace, including Affordable Workspace • Culture • Retail and Leisure • Hotels • Social Infrastructure • Storage and Distribution • Sui Generis Uses 	61
Design <ul style="list-style-type: none"> • High Quality Design and Design-Led Approach • Landscape and Public Realm (including Playspace and Urban Greening Factor and Biodiversity Net Gain) • Density • Building Heights, Scale and Massing (including Tall Building Statement) • Residential Amenity 	92

Townscape and Heritage	129
Fire Safety	133
Sustainable Design <ul style="list-style-type: none"> • Sustainability Strategy, including Social Value and Economic Inclusivity • Energy Strategy • Overheating Strategy • Whole Lifecycle Carbon and Circular Economy • Household and Commercial Waste 	136
Transport and Accessibility	154
Environmental Considerations <ul style="list-style-type: none"> • Demolition and Construction • Archaeology • Health • Air Quality • Noise and Vibration • Ecology, Greening and Trees • Ground Conditions • Water Resources • Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill • Wind • Climate 	164

Principle of Development

Relevant Policy Context

7.4. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Para. 11 outlines that for decision taking, local authorities should apply a presumption in favour of sustainable development. - Chapter 5: Delivering a sufficient supply of homes - Para. 60 recognises the need for sufficient land to come forward where it is needed, to significantly boost housing supply. - Chapter 6: Building a strong competitive economy - Chapter 11: Effective use of land - Para. 124(c) gives substantial weight to the use of brownfield land for homes and other needs.
London Plan	<ul style="list-style-type: none"> - Policy GG2: Making the best use of land - Policy GG5: Growing a good economy - Policy H1: Increasing housing Supply - Policy SD1: Opportunity Areas

	- Earls Court/ West Kensington Opportunity Area designation
RBKC Adopted Local Plan	- Policy CA4: Earl's Court Exhibition Centre
RBKC Draft Local Plan	- Policy SA2: Earls Court Exhibition Centre
LBHF Local Plan	- Policy FRA1: Earls Court and West Kensington Opportunity Area

Assessment

- 7.5. The principle of the redevelopment of this long-term underused, highly accessible Opportunity Area Site to deliver a phased, mixed-use development that will deliver significant numbers of new homes and jobs, while improving connectivity and taking opportunities to improve the Site's environmental quality, is strongly supported by planning policy at all levels. All of the policies referenced above support a transformation of the Site and an optimisation of development output, principally in relation to new homes and jobs created.
- 7.6. The NPPF directs LPAs to apply a presumption in favour of sustainable development and to approve developments that accord with up-to-date Development Plan policy. The Development Plans relevant to the Site allocate it to make a strategic contribution towards delivering new homes and jobs and as a suitable location for high density development, including tall buildings. London has a finite supply of development land and very limited opportunities of this scale. This requires the best use to be made of the Site and for its development capacity to be optimised.
- 7.7. At a London-wide policy level, the London Plan identifies Opportunity Areas as "significant locations with development capacity to accommodate new housing, commercial development and infrastructure". Policy SD1 directs boroughs to encourage and deliver the growth potential of Opportunity Areas, support development which creates employment opportunities and housing choice, necessary social infrastructure and ensures it integrates into the surrounding area.
- 7.8. London Plan Policies GG1 and GG2 aim to create inclusive communities and enable development in well-connected Opportunity Area sites. It also promotes the proactive exploration of potential to intensify the use of land to support delivery of new homes and workspaces by applying a design-led approach to determine the optimum capacity of the Site, taking a contextual approach to design to enhance the character of the development and help it to strengthen London's varied character and prioritising sustainable design and approaches to travel.
- 7.9. At the local level, expectations for the redevelopment of the Site set out in RBKC and LBHF site allocations and the RBKC Earls Court Placemaking Framework, prioritise improved connectivity through the Site, high quality public realm, housing, including affordable housing, but also extend to a wider mix of uses including workspace, culture, retail as well as social and physical infrastructure to support the new community and the wider area.

- 7.10. In support of the above policy context, community and stakeholder engagement identified the provision of accessible and inclusive public open spaces, creation of a sustainable and energy-efficient development and a healthy place that considers the environment and support for active travel as key priorities for development on the Site.
- 7.11. The Proposed Development will deliver against all of these policy priorities for the Site.
- 7.12. The Proposed Development is a product of a carefully considered design-led process that has evolved through extensive pre-application engagement over four years to ensure a balance is struck between optimisation of development on the Site and the delivery of public open spaces. It will transform the Site, creating a new piece of London comprising generous public open spaces, around which attractive buildings containing a mix of residential and non-residential uses will be arranged, connected by tree lined streets.
- 7.13. A landscape-led approach has been taken to the design of the Proposed Development and the seven Character Areas which underpin the Design Code. The Site will be accessible to the public for the first time through the creation of east-west and north-south routes that prioritise pedestrians and cyclists over vehicles. The Proposed Development will also include approximately eight hectares of public realm and open space, within a network of linked boulevards, streets and lanes of varying sizes ensuring that there are more active and open areas complemented by quieter and more enclosed spaces to create a mixed and balanced community and reflect the diverse nature of the surrounding area.
- 7.14. The mix of proposed uses will be residential-led, with flexibility built into the range of uses that have been identified for most Development Zones within the Outline Components to ensure that the development is future-proofed and resilient to future market fluctuations. A variety of residential types and tenures is proposed, including potential to deliver older persons housing and shared living, and will include a significant amount of affordable housing. This range of housing options will be complemented by Purpose-Built Student Accommodation ("PBSA"), meaning that housing and accommodation options for all ages, from students, to small and family sized households and older people will be provided. The RBKC and LBHF Detailed Components are also residential and PBSA-led, ensuring early delivery of new homes and student accommodation that will help to meet identified local needs.
- 7.15. A range of non-residential uses is also proposed which, as the submitted Commercial Strategy explains, has been composed to make the Earls Court Development a new destination in West London for an ecosystem of employment generating businesses of all sizes. Ground floor uses along main routes and around open spaces will be dominated by active frontages based on a Site-wide Cultural Strategy to deliver at least three new cultural facilities. This is intended to re-establish the Site as a visitor attraction and destination, complemented by retail, food and beverage and social infrastructure such as nurseries and community facilities that will provide for the needs of the new community and visitors to the Site. In between and above those uses on upper floors, up to three office and research and development 'hubs' will provide a flexible range of floorplates and workspaces, including

affordable workspace to meet market requirements for businesses of all sizes, from startups to Small-Medium Enterprises (“SME”) and international corporations.

- 7.16. The principle of bringing forward a landscape-led, high density mixed use development on the Site has been supported throughout the pre-application process by local planning authority (“LPA”) and GLA officers, local stakeholder groups and members of the public, where there has been a tacit understanding that the Site is identified to deliver significant areas of public realm alongside new connectivity, homes, jobs and physical and social infrastructure.
- 7.17. Development proposed under the Early Phases will deliver the mixed use redevelopment of land covered by indicative Phases 1-4, including areas of public realm and open space as well as the east-west route across the Site and north-south routes from Lillie Road and Old Brompton Road in the south through the Site to join the east-west route, before proceeding north to West Cromwell Road. Phases 5-8 will continue the mixed use redevelopment of the Site and deliver additional public realm and open space and a further route north west through the remainder of the Site to connect to Beaumont Avenue.
- 7.18. The principle of the Proposed Development is acceptable and in accordance with the strategic planning policy objectives for the redevelopment of the Site. This applies to the Outline and Detailed Components of the Proposed Development, as well as the Early and All Phases development scenarios.

Land Use

- 7.19. The Proposed Development will deliver a range of complementary land uses in a highly accessible location that will combine to create a dynamic new place and piece of London.
- 7.20. In accordance with the strategic direction of planning policy, the proposed mix of uses will be residential-led, providing a range of sizes, types and tenures of new homes, including 35% affordable housing, along with a combination of non-residential uses that will generate substantial numbers of new jobs, attract significant inward investment and provide a wide range of services and facilities, including important cultural facilities and social infrastructure to create a new Major Centre in line with the definition set out in the London Plan. It will create a mixed and balanced community for people who will live, work and visit the Site and provide significant wider benefits to the local communities in RBKC and LBHF and beyond at a regional, national and even international scale.
- 7.21. This section considers the acceptability of the range of land uses proposed as part of the Proposed Development.

Housing, including Affordable Housing, Viability and Older Persons Housing

Relevant Policy Context

- 7.22. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 5: Deliver a sufficient supply of homes - Para. 60 outlines the Governments objective of significantly boosting the supply of homes, stressing the importance that a sufficient amount and variety of land can come forward where it is needed, and that the needs of specific housing requirements are addressed. - Para. 69 stresses that planning authorities are required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement. - Chapter 6: Building a strong competitive economy
London Plan	<ul style="list-style-type: none"> - Policy GG4: Delivering the homes Londoners Need - Policy GG5: Growing a good economy - Policy SD1: Opportunity Areas - Policy H1: Increasing housing supply - Policy H4: Delivering affordable housing - Policy H5: Threshold approach to applications - Policy H6: Affordable housing tenure - Policy H10: Housing Size Mix - Policy H11: Build to rent - Policy H13: Specialist older persons housing - Housing Design Standards LPG <ul style="list-style-type: none"> - Part A2.2 and A2.6: land use - Part A5.3: Inclusion and accessibility - London Plan Housing SPG <ul style="list-style-type: none"> - Part 7: Mixed use and large developments
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CO6: Strategic Objective for Diversity of Housing - Policy CA4(a): Earl's Court Exhibition Centre - Policy CH2: Affordable housing - Policy CH3: Housing size mix and standards - Policy CH4: Specific Housing Needs
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy HO1: Delivery and protection of homes - Policy SA2(a): Earl's Court Exhibition Centre - Policy HO3: Community housing - Policy HO4: Housing size and standards - Policy HO5: Specialist housing - Policy HO6: Other housing products
LBHF Local Plan	<ul style="list-style-type: none"> - Policy HO1: Housing Supply - Policy HO3: Affordable housing - Policy FRA1: Earl's Court and West Kensington Opportunity Area - Policy HO5: Housing mix - Policy HO7: Meeting the needs of people who need care and support

Assessment

7.23. This section should be read in conjunction with the submitted RBKC and LBHF Housing Statements.

7.24. A range of types of new homes are proposed by the Proposed Development, in terms of unit size and tenure mix, including affordable housing, but also in relation to different housing products. In addition to Class C3 residential homes for sale, which could include homes for older people, build to rent (“BtR”) and Employment Related Accommodation (“ERA”) homes are also proposed as part of the LBHF Hybrid Application. Flexibility is also proposed to deliver Older Persons Housing (Class C2, as distinct from Class C3 homes for older people), Co-Living (also referred to as Shared Living in the London Plan) and Purpose Built Student Accommodation (“PBSA”) alongside and in addition to Class C3 residential homes. All of these types of housing and accommodation would make a valuable contribution to overall housing delivery in RBKC and LBHF, and for London. This and the following sub-sections assess the acceptability of the proposed range of housing and accommodation options offered by the Proposed Development.

Contribution to Housing Delivery

7.25. The Proposed Development will make a substantial contribution to housing delivery in RBKC and LBHF over the course of the next 15-20 years with potential to deliver up to 3,900 new Class C3 homes by 2043, with up to 1,400 in RBKC and up to 2,500 in LBHF.

7.26. The phased delivery of new homes throughout the lifetime of the Proposed Development will assist with market absorption over time as well as the pipeline of delivery in either borough during, and beyond, their current and emerging Local Plan periods. London Plan Table 4.1 targets the delivery of 448 new homes in RBKC and 1,609 new homes in LBHF per year to 2029. Draft RBKC Local Plan Policy HO1 aims to meet and exceed RBKC London Plan targets and deliver 1,500 new homes in the first five years of the Plan (i.e. to 2029 based on the current adoption target for the new Local Plan), or 300 homes a year, and a further 2,980 homes in years 6 to 10 (i.e. to 2034), or approximately 600 homes a year. LBHF Policy HO1 targets at least 1,031 new homes per year to 2035.

7.27. The Site also forms all or part of the following site allocations:

- Part of the ECWKO, which is identified in the London Plan to deliver an indicative 6,500 homes

All of the SA2 site allocation in the RBKC draft Local Plan, which identifies the Site to deliver a minimum of 1,050 homes

- Part of the LBHF Local Plan FRA1 site allocation, which is identified to deliver an estimated 6,500 homes

7.28. There is a well-documented need for housing across London and within RBKC and LBHF, which is set out in the submitted Housing Statements. In RBKC, housing delivery targets have only been met once in the past four years, accruing a shortfall in delivery that will need to be met over the new Local Plan period. In LBHF, annual delivery has generally met London Plan targets, although the rate of delivery will need to be maintained and boosted as the need for new homes continues to increase as reflected by projected population increase over the next 15 years.

- 7.29. The Proposed Development will make a significant contribution towards the delivery of new homes in the ECWKOA, while the RBKC Hybrid Application has the potential to exceed the minimum number of homes identified for the RBKC Site and the LBHF Hybrid Application will make a valuable contribution towards the delivery of new homes in the FRA1 site.
- 7.30. The Proposed Development includes the early delivery of new homes, with 772 homes proposed in the Detailed Components (310 homes in RBKC and 462 homes in LBHF) and targeted for first occupation by the end of 2030. This equates to a contribution of approximately one years' housing delivery, or approximately 20% towards RBKC's annual housing delivery for five years to 2030. In LBHF, the Proposed Development would contribute approximately half of one year's annual housing target, or approximately 10% towards of LBHF's housing target over five years to 2030.
- 7.31. Up to 2,462 homes could be delivered in the Early Phases (up to 1,400 in RBKC and up to 1,062 in LBHF) with the remaining balance of up to 1,438 to be delivered in LBHF in the All Phases scenario.
- 7.32. The Proposed Development will therefore make an important contribution to the delivery of new homes, in accordance with relevant planning policy in relation to strategic housing delivery objectives, as well as the Opportunity Area designation and site allocations for the Site.

Housing Mix

- 7.33. The population in RBKC and LBHF is forecast to increase over the next 20 years, with a general trend towards smaller households. There is therefore a need for more homes, with a focus on smaller homes (i.e. 1 and 2 bedrooms) as part of a mix that includes family sized homes (i.e. 2 bedroom, 4 person and 3 bedroom or larger).
- 7.34. The Proposed Development will provide a mix of residential home sizes and tenures in RBKC and LBHF that addresses local housing needs and is sufficiently flexible to align with market fluctuations over its lifetime.
- 7.35. London Plan Policy H10 states that new developments should generally consist of a range of unit sizes and their appropriate mix of units based on robust local evidence of need alongside other contextual factors.
- 7.36. RBKC Local Plan Policy CH3 (Housing Size Mix and Standards) aligns with the London Plan Policy H10 objectives, requiring new residential developments to include a mix of types and sizes of homes to reflect the varying needs of the borough, taking into account the characteristics of the site and evidence in relation to housing need. Draft RBKC Local Plan Policy H04 also reflects this.
- 7.37. Draft RBKC NLPR Para. 3.5.1 notes that the London Housing Need Assessment ("LHNA"), dated January 2022, identifies a much higher need for smaller homes in RBKC due to anticipated demographic change over the next 20 years. BKC NLPR bedroom size mix is set out in Table 20:

Unit type	Market	Community Housing*
1 bed	35%	16%
2 bed	40%	44%
3 bed	20%	28%
4 bed	5%	12%

*Blended Social / Affordable Rent and Intermediate (as set out in draft RBKC Local Plan)

- 7.38. LBHF Local Plan Policy H05 (Housing Mix) requires a mix of housing types and sizes in proposed developments, including family accommodation without being prescriptive in relation to the mix of market unit sizes. Developments should aim to meet the following affordable tenure mix subject to viability, locational characteristics and site constraints being considered on a site by site basis:

Unit Size	Social and Affordable Rent	Intermediate
1 bed	10%	50%
2 bed	40%	35%
3 bed	35%	15%
4 bed	15%	

Outline Components

- 7.39. The Outline Components of the Proposed Development include a maximum 366,682sqm (GEA) of residential floorspace (as part of an overall total of 460,000sqm (GEA) when added to the Detailed Components). This comprises up to 130,980 sqm in RBKC and 235,702 sqm in LBHF. The maximum floorspace is anticipated to accommodate up to 3,128 homes depending on final residential mix that is delivered.
- 7.40. The Proposed Development seeks to deliver a higher percentage of one and two bedroom homes in line with local need identified in the submitted RBKC and LBHF Housing Statements. Tables 22 and 23 below set out the proposed mix ranges proposed for the RBKC and LBHF Hybrid Applications. The ranges set out below are proposed having regard to target mixes by tenure where they are identified in RBKC and LBHF Local Plans and to allow for flexibility in the delivery of new homes that will be the subject of future applications for RMA. They have been the subject of pre-application discussions with borough housing and planning officers and the Applicant welcomes further discussion during the determination period for the Hybrid Applications.

Tenure	Studio	1 Bed	2 Bed	3 Bed	4 Bed
Social Rent	0%	15 – 25%	25 – 45%	30 – 45%	5 – 15%
Intermediate	0 – 10%	25 – 45%	25 – 45%	5 – 20%	0 – 10%
Market	5 – 12.5%	30 – 50%	30 – 50%	5 – 20%	0 – 10%

Table 23: LBHF Proposed Unit Type Mix Range (C3 homes)

Tenure	Studio	1 Bed	2 Bed	3 Bed	4 Bed
Social Rent	0%	20-30%	20-30%	40-45%	0-10%
Intermediate	0-10%	40-50%	34-45%	0-10%	0-10%
Market	5-12.5%	30-50%	30-50%	5-20%	0-10%

Detailed Components

- 7.41. Tables 24 and 25 below set out the proposed mix of homes within the RBKC and LBHF Detailed Components. The Applicant proposes to deliver the overall housing mix ranges for both Hybrid Applications over the course of the build out of the Proposed Development. Reconciliation Statements will be submitted with each application for RMA to track the delivery of new homes to ensure that the delivered housing mix aligns with the approved mix ranges at the end of the development.
- 7.42. The Detailed Component mixes have been prepared to broadly align with the mix ranges in Tables 22 and 23 above. Where there are differences at this stage between the mixes in the Detailed Components and in tables 20 and 21, these will be reconciled through the submission of future applications for RMA.

Table 24: RBKC Detailed Component Unit Mix (C3 homes)

Unit Type	EC05		EC06		Unit Total	
	Units	%	Units	%	Units	%
Studio	7	3%	0	0%	7	2%
1 Bed	77	39%	26	24%	103	34%
2 Bed	104	51%	46	43%	150	48%
3 Bed	14	7%	36	33%	50	16%
Total	202	100%	108	100%	310	100%

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

Unit Type	WB04		WB05		Unit Total	
	Units	%	Units	%	Units	%
Studio	28	10%	0	0%	28	6%
1 Bed	113	41%	70	38%	183	40%
2 Bed	107	38%	62	34%	169	36%
3 Bed	30	11%	52	28%	82	18%
Total	278	100%	184	100%	462	100%

- 7.43. The proposed mix ranges for the Outline Component and mix of homes proposed for the Detailed Components are appropriate for the nature and location of the Proposed Development and include a range of unit sizes from single person to larger family homes.

The proposed mix is aligned to anticipated population projections and demand and will make an important contribution to meeting unmet needs for a range of housing types in RBKC and LBHF, in general accordance with London Plan Policy H10, RBKC Local Plan Policy CH3, draft RBKC Local Plan Policy H04 and LBHF Local Plan Policy H04.

Affordable Housing and Viability

- 7.44. This section should be read in conjunction with the submitted Housing Statements and Financial Viability Assessments (“FVAs”), which set out the financial testing and assumptions and housing and demographic evidence that have informed the housing proposals.
- 7.45. Planning policy at all levels aims to maximise the delivery of affordable housing. The Site comprises a mix of public (LBD land, which is currently in TfL ownership) and private land on which new homes are proposed to be delivered. In line with London Plan Policy H4 and supporting text at para. 4.4.7, TfL has a portfolio agreement in place with the Mayor of London to deliver 50% affordable housing across its programme of development and disposal sites. This allows for individual sites to come forward, including the LBD land which has been identified for residential-led redevelopment, which meet the 35% affordable housing threshold to be eligible for the Fast Track Route set out in London Plan Policy H5.
- 7.46. London Plan Policy H5 seeks a minimum of 35% affordable housing (calculated as a proportion of habitable rooms), RBKC draft Local Plan Policy HO1 also seeks 35% (by area or by habitable room in appropriate circumstances) and LBHF Policy H01 targets 50% (by unit) for development proposals to be considered without a requirement to submit viability information as part of a planning application. This is known as the ‘threshold approach’ or ‘Fast Track Route’, which also requires the LPA to be satisfied with the compliance of a proposed development with regard to other relevant policy requirements.
- 7.47. The approach to affordable housing and viability has been the subject of extensive pre-application engagement with RBKC and LBHF planning and housing officers and their specialist viability consultants. This has involved discussion regarding the proportion, tenure and unit mix of affordable housing. As is set out in the submitted Housing Statements, 35% affordable housing is proposed (by habitable room) in the Early and All Phases scenarios.
- 7.48. The affordable homes will comprise a mix of social rent, intermediate for rent and intermediate for sale affordable housing tenure products, as required by Local Plan policy in either borough. The precise affordable housing unit size and tenure mix will be the subject of discussion with RBKC, LBHF and GLA officers during the determination period for the Hybrid Planning Applications.
- 7.49. Alongside affordable housing discussions, pre-application engagement has taken place to reach a shared understanding of the financial challenges created by the investment in infrastructure necessary to bring the Site forward. These, along with other development cost estimates, have been shared together with development value estimates and modelling of wider potential financial obligations including contributions to transport, health, education, affordable workspace, culture, community and other matters to agree an initial understanding of the viability of the Proposed Development.

- 7.50. ECDC will continue to work transparently with RBKC and LBHF by sharing updated financial information as engagement with both LPAs continues during the Hybrid Application determination process. The Proposed Development is ambitious, but also financially challenging and collaboration and partnership with the local authorities will be critical to ensure the package of benefits and financial obligations together enable the delivery of 35% affordable homes.
- 7.51. Discussions with officers are on-going with regard to the proposed housing and affordable tenure mix, along with other considerations associated with the proposed housing offer and development viability considerations. It is the Applicant's intention to follow the Fast Track route, or similar and the benefits of this route have been taken into consideration in proposing 35% affordable homes.
- 7.52. FVAs have been submitted as part of the RBKC and LBHF Hybrid Applications to demonstrate that the maximum reasonable amount of affordable housing is proposed. The submitted FVAs conclude that the proposed 35% affordable housing is well in excess of that which would typically be justified by viability alone. The 35% offer across the Proposed Development is made having regard to the benefits of a Fast Track or similar permission and represents a substantial public benefit that could enable the delivery of up to 1,183 affordable homes (up to 424 in RBKC and up to 759 in LBHF) to meet local need.

Employment Related Housing

- 7.53. LBHF's Industrial Strategy was published in 2017. The Strategy was developed as a strong partnership with business and Imperial College London, with an ambition of making the borough the best place to start and grow a business in Europe and to ensure that everyone benefits. This ambition has been a success with pipeline of over 625,000 sqm of space for start-up and scale-up businesses, creation of 6,500 jobs and securing around £5bn in growth investment.
- 7.54. In 2023 the Council proposed a 'refresh' of the Industrial Strategy. Initial proposals were presented in draft to the Economy, Arts, Sports and Public Realm Policy and Accountability Committee in March 2023. The theme of 'Inclusion' was introduced, considering how to tackle barriers to allow communities to benefit from the opportunities generated from growth. Part of this is an ambition to deliver innovative models of housing.
- 7.55. Working collaboratively, LBHF and the Applicant have embarked on a joint initiative to seek to deliver a new Employment Related Accommodation ("ERA") housing product which will aim to deliver lower cost housing for those employed by commercial occupiers on Site.

Older Persons Housing

- 7.56. The submitted Housing Statements identify that the age of the RBKC and LBHF populations are forecasted to increase significantly (approximately 32% in RBKC and 40% in LBHF) by 2043, with a commensurate increase in demand for smaller homes as older people seek to downsize from larger properties or into Class C3 homes that are designed for older people

(often referred to as 'Later Living') and for Class C2 Older Persons Housing that provides an element of on-site care for residents.

- 7.57. London Plan Policy H13, draft RBKC Local Plan Policy H05 and LBHF Local Plan Policy HO7 support the delivery of Older Persons Housing where there is an identified need and the Proposed Development would not be detrimental to the amenity of the local area or local services.
- 7.58. An allowance of up to 150 Older Persons Housing units is included in the Outline Component for each Hybrid Application to allow flexibility to address the need for this type of housing on the Site should it arise in future. Any proposal for Class C2 Older Persons Housing as part of a future RMA would be supported by evidence of the need for the proposed facility, in accordance with relevant planning policy.

Purpose-Built Student Accommodation (“PBSA”)

Relevant Policy Context

- 7.59. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 5: Deliver a sufficient supply of homes - Para. 60 outlines the Governments objective of significantly boosting the supply of homes, stressing the importance that a sufficient amount and variety of land can come forward where it is needed, and that the needs of specific housing requirements are addressed. - Para. 63 notes that within the context of establishing need, different groups in the community should be assessed and reflected in planning policies, which includes students.
London Plan	<ul style="list-style-type: none"> - Policy H15: Purpose-built student accommodation
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CH3: Housing size mix and standards - Policy CH4 (f and g): Specific housing needs
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy HO6 (d and e): Other housing products
LBHF Local Plan	<ul style="list-style-type: none"> - Policy HO9: Student Accommodation

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- 7.60. The principle of PBSA at Earls Court is supported by London Plan Policy H15 Part B, which encourages PBSA development in well-connected locations and as part of mixed-use developments. LBHF Local Plan Policy H09 specifically references the ECWKOAs as a suitable location for such a use. In accordance with the requirements of Policy H09, the Site

is located within an area benefiting from an excellent PTAL (6a) and the Proposed Development would not have a detrimental impact upon the local area.

7.61. The supporting Earls Court PBSA Demand and Needs Assessment, prepared by Knight Frank, evidences the need for additional PBSA accommodation in this location. It sets out at para. 4.3:

- *Currently, only 30% of full-time higher education students across London have access to university or private sector PBSA, while a further 24% are estimated to be living at home with parents or guardians. The remaining 46% of full-time students in London are required to find accommodation within the private rented sector and HMOs and would otherwise be unable to access university or private sector purpose-built accommodation.*
- *Research confirms that the location of the proposed PBSA development located at the Site is highly preferable as a location to live for students, in particular those studying locally at Imperial College of Science, Technology and Medicine, Royal College of Art and Royal College of Music.*
- *The Site sits within an Opportunity Area as identified in the Major's London Plan (2021) and is well served by public transport with transport links to local university campuses, principally Imperial College which has campuses at Hammersmith Hospital, Charing Cross Hospital, South Kensington and proposals for development in White City.*
- *When considering the immediate catchment of the proposed PBSA development at the Site, 12,337 full-time students living in the area are solely reliant on the private rental market for appropriate accommodation. Looking ahead to future developments, there is only one scheme in the pipeline to help alleviate that.*
- *Confirmation that Imperial College has agreed heads of terms to enter into a nomination agreement regarding the majority beds to be provided in the LBHF Detailed Component.*

7.62. PBSA is a proposed use within the LBHF Outline Component, with a maximum area of 36,884sqm GEA, and a maximum total number of units of 804. It is also proposed within the LBHF Detailed Component within Plot WB03, which will deliver 696 PBSA rooms and associated amenities and would contribute to a mixed and inclusive neighbourhood, in accordance with London Plan Policy H15.

7.63. As set out in London Plan paragraph 4.1.9 '*Net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home*'. The Detailed Component 696 PBSA rooms would contribute the equivalent of 278 new homes towards LBHF meeting their housing need and the Outline Component has the potential to contribute the equivalent of a further 322 new homes.

7.64. In respect of Key Principle DA9 (Hotels and Student Accommodation) of the LBHF Planning Guidance (2018), Parts d-e of Policy H09 and Part 5 of London Plan Policy H15, the proposed PBSA would be of a high quality, with daylight maximised as part of the building

design development. It would provide a range of unit sizes with functional living spaces and layouts, including accessible accommodation and occupiers benefiting from a generous quantum of communal amenities both internally and externally.

- 7.65. 35% of the proposed student bedrooms are proposed to be provided as affordable student accommodation in line with London Plan Policy H15, part A4, satisfying the definition in paragraph 4.15.8 the London Plan as set out in the submitted LBHF Housing Statement, and a Nominations Agreement with a Higher Education provider will be secured through appropriately worded S106 obligations for the majority of bedrooms in accordance with part f of the Policy and London Plan Policy H15 (part A3). Imperial College has agreed heads of terms with ECDC, on behalf of the Applicant, to enter into a Nominations Agreement for the majority bedrooms to be provided within WB03.
- 7.66. There is potential for up to 30 PBSA bedrooms to be proposed in Development Zone V2, which falls across the borough boundary in RBKC to the west of the WLL. This is solely a factor of the location of the proposed building in this part of the Site, the majority of which lies within LBHF (Development Zone V1). It is also only one potential use of the building, which is also proposed for residential or Co-Living uses. The proposed potential use of this isolated piece of land in RBKC for PBSA use is considered acceptable having regard to its particular circumstances and association with a building that predominantly lies within LBHF.
- 7.67. In summary, the delivery of PBSA accommodation on the Site would meet an identified need, contribute to housing delivery and assist in the creation of a balanced, inclusive community at the Site. The standard of accommodation is considered to be high and in accordance with London Plan H15, LBHF Local Plan H09 and SPD Key Principle DA9.

Co-Living / Shared Living

Relevant Policy Context

- 7.68. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 5: Deliver a sufficient supply of homes - Para. 60 outlines the Governments objective of significantly boosting the supply of homes, stressing the importance that a sufficient amount and variety of land can come forward where it is needed, and that the needs of specific housing requirements are addressed. - Para. 63 notes that within the context of establishing need, different groups in the community should be assessed and reflected in planning policies.
London Plan	<ul style="list-style-type: none"> - Policy H1: Increasing Housing Supply - Table 4.1: 10-year housing target for net completions - Para. 4.1.9: net non-self-contained communal accommodation housing supply ratio of 1.8:1 - Policy H16: Large-scale purpose-built shared living

	<ul style="list-style-type: none"> - Large-scale purpose-built shared living (LSPBSL) LPG (February 2024) <ul style="list-style-type: none"> - Para. 1.1.1 notes that the purpose of the document is to provide guidance to support London Plan Policy H16. - Para.1.2.3: Although LSPBSL is not considered to meet the housing needs of London, it contributed to an element of housing choice and is counted towards housing supply on a ratio of 1.8:1 basis as per London Plan Policy H1 paragraph 4.1.9. - Section 2: Planning for LSPBL development - Para 2.1.1: Criteria to meet the requirements of London Plan Policy H16 (part A3). - Section 3.11: Private Units - Para. 3.11.1: requirement of private units to be accessed through a shared internal area and not have separate access to accord with London Plan Policy H16(7). - Section 4: Affordable Housing
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CH3: Housing Size Mix and Standards
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy HO6(b): Other Housing Products

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- 7.69. There is the potential for the delivery of Co-living floorspace, also known as Shared Living, (Sui Generis) as part of the Outline Components of the Proposed Development.
- 7.70. Co-living units are defined for the purposes of the Proposed Development as Sui Generis non-self-contained housing units that are distinct from Class C3 residential units but are not restricted to occupation by specified groups, such as students or older people. Co-living is a relatively new type of housing, designed to be an alternative to living in a shared rental house or flat. There is growing market interest in its provision.
- 7.71. A maximum of 50,000sqm GEA of Co-Living floorspace (up to 1,000 units) is proposed across the Outline Components of the two Hybrid Applications. There is potential for up to 40 Co-Living units to be proposed in Development Zone V2, which falls across the borough boundary in RBKC to the west of the WLL. As is mentioned in the sub-section above, is solely a factor of the location of the proposed building in this part of the Site, the majority of which lies within LBHF (Development Zone V1). It is also only one potential use of the building, which is also proposed for residential or PBSA uses. The proposed potential use of this isolated piece of land in RBKC for Co-Living use is considered acceptable having regard to its particular circumstances and association with a building that predominantly lies within LBHF.
- 7.72. Whilst there is no Co-living floorspace envisaged in the Illustrative Masterplan, flexibility is proposed to allow for Co-living floorspace to come forward in defined Development Zones

as specified in the Development Specification and the Land Use Parameter Plans on certain flexible plots to allow for it to form part of the diverse range of housing options available on the Site, should market demand support it in future.

- 7.73. There is policy support for its provision and London Plan Policy H16 encourages co-living in areas “well-connected to local services” such as the Site. The London Plan recognises the pressing need for more homes in London and recognises that Co-living would count towards meeting housing targets on the basis of a 1.8:1 ratio, with 1.8 co-living bedrooms/units being counted as a single conventional home. This approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up. Therefore, this form of housing delivery would make a substantial contribution to the Opportunity Area’s and the two boroughs housing targets.
- 7.74. In February 2024, the GLA published the Mayor of London’s Large-Scale Purpose-Built Shared Living LPG, which expands its guidance and specifically identifies which areas will be more suitable for co-living, including Opportunity Areas and Inner London areas with a PTAL of 4 or higher. Therefore, the guidance supports the principle of the delivery of this type of housing at the Site.

Workspace, including Affordable Workspace

Relevant Policy Context

- 7.75. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	- Chapter 7: Strong, competitive Economy
London Plan	- Policy E1(g): Offices - Policy E2(d): Providing suitable business space - Policy E3: Affordable workspace - Policy E8: Sector opportunities and growth - Policy E9: Retail, markets and hot food takeaway - Housing Design Standards LPG - Policy A2.1L Land use mix
RBKC Adopted Local Plan	- Policy CF5: Business uses
RBKC Draft Local Plan	- Policy PLV2: Earl’s Court Opportunity Area - Policy SA2: Earl’s Court Exhibition Centre - Policy BC1: Business uses - Policy BC3: Affordable workspace - Policy TC1: Location of town centre uses
RBKC Supplementary Planning Documents	- The Council’s Employment Land Study, October 2021 forecasts a demand of 60,500 sqm of net additional office floorspace by 2043.

	<ul style="list-style-type: none"> - Earl's Court Placemaking Framework notes that the site will become a lively new quarter of cultural, employment and residential uses that is innovative, sustainable and integrated with the surrounding neighbourhood. - Priority 4.2(c): The value of active uses, specifically relates to affordable workspace, which should be designed to meet the needs of local people and organisations, and to compliment wider commercial and cultural strategies.
LBHF Local Plan	- Policy E1: Providing for a range of employment uses
LBHF Supplementary Planning Documents	- Affordable Workspace SPD (2022)

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Commercial Strategy and creation of a new employment destination in West London

- 7.76. This section should be read in conjunction with the submitted Commercial Strategy and Town Centre Impact Assessment, as well as submitted Cultural and Retail Strategies. The Commercial Strategy explains the proposed approach to the delivery of new employment-generating workspace as an important part of the Proposed Development and mix of non-residential uses that are proposed to make the Site a new Major Centre and destination in West London. It is supported by evidence prepared by Knight Frank, JLL and Urban Spring which demonstrate why the Site is an appropriate location for a new town centre and the potential scale and types of workspaces that are proposed.
- 7.77. The Earls Court Development is a rare opportunity to revitalise and reinvigorate the Site, as well as the neighbourhoods, businesses, and communities in and around the Site. The Proposed Development is envisioned to have a national (and even global) reach connecting with the growing network of international innovation districts, sharing, learning, and combating planetary crises. In this way, the Proposed Development will put Earls Court and West London on a global stage.
- 7.78. To achieve the desired success, the Proposed Development will require not only a variety of uses, but a rich mix within the commercial use itself, which is aligned with drivers of employment and economic development-related London Plan and Local planning policies, LBHF's Industrial Strategy as well as the objectives of the NPPF. The Proposed Development aligns with or exceeds the objectives of several relevant planning policies, not least of which include:
- There is an expectation in both the RBKC and LBHF Local Plan site allocations that the redevelopment of the site should provide a significant office quantum and job delivery. Both Local Plans envisage employment uses playing an important role in the creation of a new mixed use urban district with open space and other commercial and cultural uses

- RBKC's draft Local Plan Policy PLV2, and proposed site allocation seek a lively new urban quarter with commercial and cultural uses and draft Policy TC1 supports the establishment of a new town centre in the ECWKOA, while draft Site Allocation SA2 allocates the Site to deliver a minimum of 40,000sqm or more of non-residential floorspace, of which a minimum 20,000 sqm should be for Class E(g) offices or research and development or light industrial space
- The LBHF Industrial Strategy sets out LBHF's four priorities to transform the borough into a 'West Tech' hub as a global beacon for innovation and growth and a leading place for tech and creative businesses, education and research, with the aim of delivering economic growth for all, including supporting residents with high quality training
- LBHF is driving and supporting growth within a wider West London context through its Industrial Strategy and by forming an Enterprise Board, of which ECDC is a member. This Commercial Strategy supports the Enterprise Board's aims
- LBHF's Local Plan Strategic Regeneration Area: FRA1 Earls Court requires development proposals to contribute to providing a mix of land uses, including employment, and identifies the wider ECWKOA as having the ability to deliver an estimated 8,500 jobs
- LBHF Local Plan Policy E1 states that the Council will support proposals including mixed-use schemes for new employment uses, especially those that recognise the existing strength in the Borough in creative industries, health services, bio-medical and other research-based industries and the Opportunity Area is identified as being a preferred location for new office development above 2,500 sqm within the Borough

7.79. The Commercial Strategy demonstrates a need for the proposed quantum of commercial floorspace and explains the benefits it will deliver. While it is primarily focussed on the delivery of floorspace for a range of commercial and office led uses, which makes up the majority of floorspace relevant to the strategy, it also highlights the importance of other uses that are intrinsic to its future success, such as cultural, retail, food and beverage and leisure uses will combine to create an employment ecosystem and attractive destination in West London.

7.80. The Strategy is based on the potential for attracting businesses in the clean and climate technology industry with the intention of attracting innovation and skills to form a focus for the commercial element of the Proposed Development. Having a focus can assist speed of delivery, but this does not mean that all businesses must or will be based in this sector. It is intended to be an attractor that pulls in a diverse mix of types and scales of businesses, which in turn helps support a virtuous circle, leading to long term growth and resilience.

7.81. The majority of the proposed workspace is within the Outline Components. The Detailed Components will be residential-led and complemented by mix of ground floor retail, food and beverage, cultural, leisure and community floorspace to create a new place in the first phase of the development. A limited quantum of workspace is provided within Plot EC06 facing Warwick Crecent (322 sqm GEA). Along with housing, commercial floorspace in the Outline Component is proposed with the most amount of potential flexibility to allow the Proposed Development to develop taking account of market conditions over time as it comes forward. Much of the proposed workspace is arranged in three cluster areas, one in

RBKC and two in LBHF, and spread across Early and All Phases to allow the gradual build out and evolution of the strategy as floorspace is constructed and occupied.

- 7.82. Within the quantum of floorspace proposed, a full range of and scale of workspaces is envisaged, although not prescribed at this stage. This is to allow flexibility to provide opportunities for business of all sizes to encourage complementary co-location and scope for campus-like congregations of like-minded businesses and suppliers and for start-ups, Small-Medium Enterprises (SMEs) and major national and multinational corporations to exist alongside one another to create an industrial and employment ecosystem.
- 7.83. In addition, the Proposed Development will deliver a range of opportunities for training and upskilling which will benefit the local community and support pathways into new and better paid employment. Such initiatives are already on-going in the TfL Skills Hub located on the Site and will be secured through appropriately worded S106 obligations through discussion with RBKC and LBHF officers.
- 7.84. The Commercial Strategy finds that there is sufficient demand in the market for the proposed commercial floorspace, of which up to 270,000 sqm (GEA) will be for office and research and development (comprising up to 95,000 sqm in RBKC and 175,000 sqm in LBHF). The capacity of the proposal will be fundamental to the creation of a new Major Centre on the Site and allow for a co-ordinated delivery of much-needed high quality floorspace to establish West London as a leading global office destination, which will attract the associated benefits of employment, wider economic growth and training opportunities.
- 7.85. The proposed workspaces will be of high quality, having regard to the industry accreditations that will be targeted, setting the Site apart from floorspace in the wider area, which while potentially available would not be of comparable quality or accessibility. The Proposed Development will also provide opportunities to attract businesses that would not otherwise have considered locating in West London. It is this differentiation that will create a new office market in the area, avoiding competition with older, lower quality office stock in existing centres and incentivising refurbishment and redevelopment as part of a wider step change in the quality of employment space locally.
- 7.86. The Proposed Development would seek to deliver sustainable commercial space to anchor the Site and strengthen the economy of the boroughs and central London. The offer could include:
- Grade A commercial office space suitable for large scale occupiers/headquarters
 - Lab or lab-enabled office space
 - Flexible workspace including affordable workspace and studios
 - Maker space and production space

Impact and Sequential Tests

- 7.87. The NPPF aims to ensure the vitality of town centres and sets out criteria for the application of the sequential and impact test. Para. 86 advises that a sequential test should be required for planning applications for employment generating 'main town centre uses' (which

includes offices) that are not in an existing centre and are not in accordance with an up-to-date Local Plan.

- 7.88. The sequential test seeks to focus development in town centre locations, followed by edge of centre locations and only where suitable sites are not available within a reasonable period of time should out of centre sites be considered. Paragraph 87 emphasises that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Paragraph 90 advises that where an application fails to satisfy the sequential test, it should be refused.
- 7.89. NPPF para. 89 advises that impact assessments should only be required for retail and leisure development outside town centres and makes no reference to office floorspace. Paragraph 14 of the NPPG confirms that the impact test “relates to retail and leisure developments (not all main town centre uses)”. The NPPF and NPPG are clear that an impact test is not required for office development.
- 7.90. Annex 2 of the NPPF provides a glossary of definitions and defines Edge-of-Centre (for all other main town centre uses) as a location within 300 metres of a town centre boundary. For office development this includes locations outside the town centre but within 500 metres of a public transport interchange;
- 7.91. The Site lies approximately 260 metres from the boundary of Earls Court Road District Centre, and 225 metres from the Town Centre Boundary of Fulham Major Centre. The Site is less than 300 metres from each Town Centre Boundary and is an ‘edge-of-centre’ site when considering the policy tests in respect of the proposed office floorspace.
- 7.92. London Plan Policy SD7 states that when considering development proposals, boroughs should take a town centres first approach. Boroughs are directed to apply the sequential test to applications for main town centre uses, requiring them to be located in town centres.
- 7.93. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport.
- 7.94. Going beyond the advice set out in the NPPF, London Plan Policy SD7 requires an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan.
- 7.95. The mixed-use proposals, including offices, are very much site specific and inter-related and have been curated to respond to the policy aspirations for the Site. The office floorspace will only come forward as part of the wider redevelopment of the Site, which will create a new Major Centre as defined by the London Plan, having regard to the services and facilities it will provide. For the reasons set out in the sub-section above, the workspace created by the Proposed Development will be designed to create a new employment destination in West London, opening new markets and attracting new business and employers to the region. It will be a fundamentally different offer from that in existing centres in terms of the

quality, scale and nature of co-located floorspace proposed that is expected to incentivise the improvement of existing town centre stock while enhancing the wider area as a growing and developing employment location. The Proposed Development will therefore have an acceptable impact on existing centres in the local area.

- 7.96. In respect of the sequential site assessment, there is no requirement to consider the potential to accommodate this floorspace elsewhere. A significant office quantum on the Site is supported in the adopted and emerging Development Plan to realise the planned mixed-use urban district, including substantial job delivery. Paragraph 011 of the PPG states that use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. The sequential test is therefore passed.
- 7.97. The proposed workspace forming part of a wider mixed-use Proposed Development is in accordance with the Development Plan, and the impact and sequential tests are passed.

Affordable Workspace

- 7.98. An important part of the overall commercial strategy and its functioning as an ecosystem is the delivery of affordable workspace. An Affordable Workspace Strategy has been submitted as part of the Hybrid Applications to identify the need and opportunities for affordable workspace delivery as part of the Proposed Development.
- 7.99. London Plan Policy E3 (Affordable Workspace) specifically relates to affordable workspace, defined as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural (such as creative artists workspace, performance space and makerspace), or economic development purpose. Policy E3 requires Councils to identify areas where there is a need for affordable workspace, based on local evidence of need and viability.
- 7.100. RBKC Emerging Policy BC3 requires a minimum of 10% of business floorspace to be affordable, with an upper limit subject to an assessment of need, capped at a rate of at least 50% less than the prevailing market rate for comparable premises.
- 7.101. RBKC's Placemaking Framework SPD (2023) states that affordable workspace should be "*suitable for local organisations including creative and performance groups*" and that "*start-up and local businesses benefit from synergies with the site's wider commercial and creative ecosystem.*"
- 7.102. The LBHF Affordable Workspace SPD (2022) is less prescriptive but suggests developments in the West Brompton part of the Borough (which includes the Site) could provide up to 20% affordable workspace at discounts to market rents, but that affordability will be measured on a case-by-case basis. LBHF's Industrial Strategy (2017) highlights the importance of expanding the proportion of STEM, media, digital and creative businesses across the borough through new affordable workspace.
- 7.103. The vision set out in the overarching Commercial Strategy is not just achieved by delivering large scale space to accommodate the big occupiers, but the full ecosystem of types of

spaces that can accommodate a range of businesses growing in the area, servicing the larger enterprises, and spinning out from west and central London's Universities.

- 7.104. Ensuring there is space available for businesses of different scales is vital to creating a fully functioning local economy. Smaller, growing businesses can benefit from the larger occupiers who will move here, but equally larger businesses will be well served by those smaller supporting businesses. Providing workspace that is accessible and affordable to smaller growing enterprises is important to support economic development and ensure that firms can grow and prosper in this area.
- 7.105. The scale and variety of uses proposed as part of the Earls Court Development presents the opportunity to go beyond the standard approach of providing lower cost workspace at a discounted rental rate. There is the opportunity here to reallocate some of this affordable workspace support to bring in meanwhile uses and consider other affordable uses beyond office / workspace such as retail and cultural floorspace for wider placemaking initiatives. It is also important given the size of the Proposed Development to consider how it will be flexibly phased over time and how businesses can be helped in different ways (i.e. not only in relation to rent discounts), such as varying the discount or instead offering more help with up-front costs such as fit-out subsidies. The Affordable Workspace Strategy for the Proposed Development goes beyond just a standard affordable workspace offer where a percentage of floorspace is identified to be offered at discounted rents to create a better-tailored mix of benefits, of equivalent value, that establishes the Site as a new economic quarter, and spreads those benefits to the surrounding communities.
- 7.106. The size, complexity, and length of this development project means the affordable workspace programme is likely to be of a scale and nature that neither borough has seen to date. This will mean close working between the Applicant and the boroughs over the coming years to make the most of this significant opportunity. The final details cannot be fixed and inflexible at the outset, or 'one size fits all', as this would risk limiting the benefits the strategy could deliver and the range of businesses that may be able to benefit. Instead, the Strategy will need to evolve through the lifetime of the Development project, to match the needs of the Site and the business community, within a framework agreed through the application process and secured through appropriately worded S106 obligations.
- 7.107. The Affordable Workspace Strategy seeks to set out the scale of the opportunity here, to establish a robust basis for considering a variety of options for delivering affordable space to support local businesses and enterprise.
- 7.108. ECDC's commitment, on behalf of the Applicant, to the provision of affordable workspace is demonstrated as part of the Temporary Uses, Retail and Cultural Strategies for the Site, which has already started through ECDC's delivery of affordable workspaces on the Site to date.
- 7.109. The affordable workspace is to be provided across a range of employment-generating uses and in accordance with a level to be agreed with the LPAs. A flexible arrangement is to be discussed and agreed, whereby within this overall agreed level, alternative affordable

provision of equivalent value can be provided. This to be governed by agreed rates of equivalence for alternative offers to discounted rents, such as:

- Discounts on different types of space or other levels of discount
- Up-front support for businesses such as fit-out or rent-free periods
- Shared spaces such as co-working
- Contribution of temporary or meanwhile uses
- Incentives for early delivery of affordable space
- Offsite contributions if necessary (although with a preference for on-Site)

7.110. A process is to be established for agreeing details of future Workspace Management Plans for relevant phases or part phases. Such plans may include details such as:

- Completion dates, areas, rents, terms and specification
- The target sectors or organisations the space is aimed at
- How the space will be marketed and managed
- Expectations for use, footfall and noise management

7.111. A reconciliation mechanism is anticipated to be secured in S106 Agreement obligations, to ensure monitoring of affordable workspace delivery against target, to be agreed on a phase-by-phase basis.

7.112. In the Early Phases, development would be residential-led, with the provision of commercial floorspace focused around Earls Court Station within RBKC and at West Brompton Station within LBHF and in part RBKC. Later phases of the Proposed Development will see further commercial floorspace delivered and focussed next to the A4 on the northern edge of the Site in LBHF.

7.113. In summary, the proposed commercial strategy, affordable workspace and job creation will deliver major benefits to the local area, to London and further afield. This will make a significant contribution to meeting employment-related strategic planning policy objectives and form an important part of the mixed and balanced community that is to be created at Earls Court, in accordance with the national, regional and local planning policy framework.

Culture

Relevant Policy Context

7.114. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
London Plan	<ul style="list-style-type: none"> - Policy HC5: Supporting London's culture and creative industries - Policy DF1(d): Delivery of the Plan and Planning Obligations
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CV1: Vision for the Borough - Policy CO2: Strategic Objective for Fostering Vitality - Policy CF5(h): Business Uses

	<ul style="list-style-type: none"> - Policy CF6: Creative and Cultural Businesses - Policy CF7: Artis and cultural uses - Policy CF11: South Kensington Strategic Cultural Area - Earl's Court Placemaking Framework SPD: ambition for the Site to deliver a cultural facility of world-class renown
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy HO3: Community Housing - Policy T4: Streetscape - Policy BC2: Creative and Cultural Businesses - Policy TC7: Art and Culture uses - Policy TC10: South Kensington Strategic Cultural Area - Policy PLV2: Earl's Court Opportunity Area - PLV14: Earl's Court - SA2(d,g,l): Earl's Court Exhibition Centre
LBHF Local Plan	<ul style="list-style-type: none"> - Policy FRA1: Earl's Court Opportunity Area - Policy TLC5: Managing the impact of food, drink and entertainment uses - Policy CF1: Supporting community facilities and services - Policy CF3: Enhancement and retention of arts, culture, entertainment, leisure, recreation and sport uses - Hammersmith and Fulham Arts Strategy

Assessment

- 7.115. The submitted Cultural Strategy sets out the proposal to create an innovative cultural neighbourhood as part of the Proposed Development.
- 7.116. A maximum of 10,000 sqm (GEA) of cultural (Class F / Sui Generis) floorspace is proposed across the two Hybrid Applications, comprising up to 3,000 sqm in RBKC and up to 7,000 sqm in LBHF.
- 7.117. Other retail or leisure-related cultural uses may also come forward as part of the Proposed Development, although it must be noted that such uses may occupy floorspace under other Use Classes, such as Class E as described in the submitted Development Specification. Further information in relation to the types of uses that are anticipated to occupy the proposed cultural floorspace is provided in the submitted Cultural Strategy.
- 7.118. There is a strong policy basis for the delivery of culture as part of a mixed use scheme at a strategic scale through the Site's various policy site allocations. LBHF's Site Allocation FRA1 identifies the Site for cultural uses and RBKC's emerging draft Site Allocation SA2. RBKC's adopted Earl's Court Placemaking Framework SPD set out an ambition to put Earls Court back on London's cultural map and create a vibrant destination for culture and LBHF's Cultural Strategy promotes the borough as a cultural destination.
- 7.119. One of the four Place Pillars linked to the Vision to bring the wonder back to Earls Court is to deliver 'a cultural ecosystem for the future of talent'. Key to the cultural strategy is to deliver an innovative cultural neighbourhood, from art and performance within the public realm to a range of high-quality spaces for rehearsal, production and performance. The

Earls Court Development would create an ecosystem of spaces and places that would deliver a cultural offer to enable the creation and delivery of cultural activity of international quality.

7.120. There is a commitment to deliver three main cultural venues in the following locations and in accordance with agreed definitions and specifications set out in the Cultural Strategy, referred to as The Crescent, Empress Place and The Train Shed. Other venues and cultural spaces may cluster around these defined spaces. The definition of cultural venue will need to be sufficiently flexible to enable a range of facilities and destination type uses to come forward in future.

7.121. Within RBKC:

- West Brompton Crescent: a flexible larger venue of up to 1,000 sqm to accommodate approximately 750 people standing or circa 400 seated for music, theatre and other uses to be delivered in the first phase of the Proposed Development. This will be complemented by other potential venues, café or restaurants

7.122. Within LBHF:

- Empress Place: a larger venue of up to 3,500 sqm to accommodate approximately 1,000 people standing or 600 seated within Development Plot WB08
- Lillie Sidings: a large venue, with a strong food and beverage focus, of up to 2,000 sqm accommodating approximately 900 people standing or circa 500 seated

7.123. In addition to the above, the following cultural facilities could come forward across the Site:

- Exhibition Gardens: the delivery of public art within the public realm and the potential to deliver additional incidental and ancillary cultural or creative uses within the public open spaces. Any incidental use would be small scale and additional permanent structures will be subject to separate planning applications in future
- Temporary uses: A Temporary Uses Strategy has been submitted in support of the application for potential temporary uses to be located on the Site during its phased construction, building on the range of temporary uses currently in operation on the Site, alongside temporary boundary interfaces between areas of public realm and construction sites. These uses are intended to have a cultural focus

7.124. As set out in the Affordable Workspace section above, there is an opportunity to discount cultural or maker spaces as part of the affordable workspace strategy. Artistic and cultural venues cannot compete for commercial space in inner London, and to be viable will need affordable space, as recognised in the London Plan policy on affordable workspace. Using affordable workspace to support the creative and cultural industries will enable Earls Court to establish itself as a sustainable hub for the cultural sector.

7.125. ECDC's commitment to culture, on behalf of the Applicant, is demonstrated as part of the Temporary Uses Strategy for the Site and the temporary initiatives already delivered to date

which are set out in the Planning History section (Chapter 3) of this Statement and the submitted Cultural Strategy.

- 7.126. Development proposed under the Early Phases will deliver a significant proportion of the cultural floorspace, with spaces proposed at The Crescent in RBKC, and Empress Place in RBKC and LBHF, forming part of this early delivery, alongside a large portion of the Exhibition Gardens and public realm where there will be opportunities for public art. The Train Shed would then be delivered in the later phases of the All Phases scenario.
- 7.127. The Proposed Development will deliver on the vision and aspirations within relevant policy and guidance to embed important cultural uses and spaces within mixed use development and ensure Earls Court is again functioning as a major visitor attraction and destination for London with potential for international renown. The spaces and facilities envisaged would attract small and large scale operators. The key cultural spaces and facilities proposed by the Applicant will be secured through appropriately worded S106 Agreement obligations.

Retail and Leisure

Relevant Policy Context

- 7.128. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 6: Building a Strong, Competitive Economy - Chapter 7: Ensuring the Vitality of Town Centres - Paragraph 90(d) notes that a range of sites should be allocated in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead. The anticipated needs for retail, leisure and other main town centre uses over this period should not be compromised by limited site availability.
London Plan	<ul style="list-style-type: none"> - Policy SD6: Town Centres and High Streets - Policy E9: Retail, markets and hot food takeaways - Policy SD1: Opportunity Areas
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CV1: Vision for the Royal Borough - Policy CP1 Core Policy: Quanta of Development - Policy CA4: Earl's Court Exhibition Centre - Policy CF1: Location of New Shop Fronts - Policy CF2: Retail development within Town Centres - Policy CF4: Street Markets
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy PVL14: Earl's Court - Policy SA2: Earl's Court Exhibition Centre - Policy TC1: Location of town centre uses - Policy TC2: Nature of development within Town Centres - Policy TC3: Diversity of uses within Town Centres - Policy T3: Living streets and outdoor life

LBHF Local Plan	<ul style="list-style-type: none"> - Policy FRA1: Earl's Court and West Kensington Opportunity Area - Policy TLC1: Hierarchy of Town and Local Centres - Policy CF1: Supporting Community facilities and services - Policy CF3: Enhancement and retention of arts, culture, entertainment, leisure, recreation and sport uses
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Assessment

- 7.129. The submitted Retail Strategy and Town Centre Use Impact Assessment documents provide a strategy for delivery and an assessment of the impacts of the retail and leisure elements of the Proposed Development.
- 7.130. Adopted local policy in RBKC and LBHF provide a clear basis on which to bring forward a mixed use scheme at a strategic scale through the Site's various policy site allocations. Policy expectations are that the Proposed Development, whilst prioritising housing, must also extend to a wider mix of uses including offices, culture, hospitality and social infrastructure and it is expected a retail and leisure offer of sufficient scale is included to support the new community on the Site. The principle of the provision of retail and leisure floorspace, which will contribute to the overall range of non-residential services and facilities that the Proposed Development will deliver to create a new Major Centre, is supported by the Site's status as a Neighbourhood Centre for retail within RBKC's emerging draft Site Allocation SA2.
- 7.131. A maximum of 25,000 sqm (GEA) of flexible retail-related commercial uses (within Class E (a) / (b) / (c)) / Sui Generis), 11,000 sqm in RBKC and 14,000 sqm in LBHF, is proposed across the Hybrid Applications. 1,319 sqm GEA of flexible Class E (a) / (b) / (c) floorspace is proposed under the RBKC Detailed Component and 1,765 sqm GEA of flexible Class E (a) / (b) / (c) floorspace is proposed under the LBHF Detailed Component.
- 7.132. A maximum of 13,000 sqm (GEA) of leisure (Class E(d)) floorspace, 4,000 sqm in RBKC and 9,000 sqm in LBHF is proposed across the two Hybrid Applications. 2,045 sqm GEA of leisure (Class E(d))/sui generis floorspace is proposed as part of the LBHF Detailed Component.
- 7.133. Further information in relation to the types of uses that are anticipated to occupy the proposed retail / food and beverage / flexible / leisure commercial floorspace is provided in the submitted Retail Strategy and Cultural Strategy.
- 7.134. The Retail Strategy sets out the vision for the proposed ground floor uses (leisure, cultural, restaurants and retail) across the Earls Court Development to form part of the creation a unique destination in West London. The strategy is based on analysis of the current and future customer (i.e. resident, worker, visitor and tourist) needs, creation of a differentiated positioning in both the local and wider London context and reflecting the requirements of relevant planning policy (as detailed in the Town Centre Impact Assessment), as well as understanding the components of a successful neighbourhood through global exemplars and distilling these within the proposals.

- 7.135. The focus of the Strategy is to deliver an active and engaging neighbourhood at Earls Court in line with the overarching Vision and Place Pillars. The combined delivery of leisure, culture, restaurants and retail will appeal to all customer groups and is critical to ensuring Earls Court is a place for everyone, and a place to live, work and spend time. These ground floor uses will be carefully considered and selected to ensure the Proposed Development complements the existing neighbourhood and provides a point of difference from the local offer. The Site represents a great opportunity to deliver a new neighbourhood that strategically stitches into the wider West London context, increasing the quantum of footfall and expenditure to the local area.
- 7.136. The Applicant's retail vision for the Proposed Development is as follows:
- To deliver a diverse mix of ground floor uses, from independent retail, makers and producers to restaurants and some well-known brands
 - Each Character Area (as set out in the submitted Design Code) will have a clear purpose and identity with a distinct offer as described in the submitted Retail Strategy
 - Deliver sufficient quantum of anchor spaces distributed across the Site to accommodate cultural, food, retail and leisure uses to be a successful destination
 - Animation of key streets and squares to create an attractive and vibrant destination for residents and workers as well as visitors
- 7.137. The scale of retail and leisure floorspace will extend and integrate with facilities in adjoining high streets, serving the needs of the local residential and worker community, whilst the cultural venues and associated F&B/leisure floorspace will create a destination, re-establishing Earl's Court as a destination for arts and entertainment.
- 7.138. A vibrant ground floor will activate the public realm and routes through the Site, encouraging visitors to use the amenities and experiences or access the streets and areas beyond. There is a clear locational requirement for the commercial floorspace to form part of the Earl's Court development proposals and new community being created.
- 7.139. The retail floorspace within the LBHF Detailed Component will form part of the new Boulevard and will enliven the public realm at the centre of the Site. The RBKC Detailed Component retail floorspace will enhance the vitality and viability of the new Neighbourhood Centre and provide active frontages onto the new Table Park.
- 7.140. The Site occupies an edge-of-centre location and is over the locally set floorspace thresholds for impact and sequential testing in each respective Local Plan. Nevertheless, the analysis demonstrates that the floorspace proposed is compliant with the adopted Development Plans. Borough policy objectives promote balanced growth, containing a mix of residential, employment, culture, retail and community uses that will create a new Major Centre, while also ensuring support for existing high streets and ensuring old and new are properly integrated. The introduction of a new population, workforce and visitor population will contribute to the turnover of these existing high streets (Earl's Court Road District

Centre, Fulham Town Centre and North End Road (West Kensington) Local Centre). Growth must also promote community cohesion and access to spaces, place and facilities. The Proposed Development seeks to proactively respond to these wider borough policy objectives.

- 7.141. The retail and leisure floorspace will be appropriately sized when coming forward for RMA, delivering significantly less total quantum overall than comparative developments (Battersea Power Station and Kings Cross). This helps support the spillover and connectivity with the nearby Earls Court Road and North End Road high streets. The Town Centre Use Impact Assessment undertakes a sequential assessment and concludes that the Proposed Development is of an appropriate scale and would not create an adverse retail impact on neighbouring centres.
- 7.142. Development proposed under the Early Phases would deliver retail and leisure floorspace proportionate to the scale of residential and commercial floorspace to be delivered, with the strategies described above extrapolated proportionately in the All Phases scenario.
- 7.143. The retail and leisure elements of the Proposed Development accord with relevant planning policy and form an essential part of the strategy to deliver a vibrant place and inclusive community on the Site, while making a positive contribution to the local economy and the wider area.

Hotels

Relevant Policy Context

- 7.144. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
London Plan	- Policy SD6: Town Centres and High Streets
RBKC Adopted Local Plan	- Policy SA2: Earl's Court Exhibition Centre - Policy CF7: Servicing Policy - Policy CF8: Hotels -
RBKC Draft Local Plan	- TC8: Hotels and other forms of tourist accommodation - Policy T9: Servicing
LBHF Local Plan	- Policy FRA1: Earl's Court and West Kensington Opportunity Area - Policy E3: Provision for visitor accommodation and facilities

Assessment

- 7.145. London Plan Policy E10 states that London's visitor economy and associated employment should be strengthened and a sufficient supply and range of serviced accommodation should be maintained, taking into account the needs of business as well as leisure visitors.

The Proposed Development includes the potential for the provision of hotel floorspace. A maximum of 32,000 sqm (GEA) of hotel (Class C1) floorspace is proposed, 12,000 sqm in RBKC (up to 150 hotel rooms) and 20,000 sqm (up to 250 hotel rooms) in LBHF across the Outline Components of the two Hybrid Applications.

- 7.146. While there is no hotel floorspace shown in the Illustrative Masterplan, there is an ability for hotel floorspace to come forward in defined Development Zones as specified in the Development Specification and the Land Use Parameter Plans. This is explored in further detail within the submitted DAS Volume 1: Outline Component, which demonstrates an alternate illustrative design response on Plot EC16 that fronts Warwick Square for a hotel use rather than a commercial building.
- 7.147. This potential provision of hotel floorspace would serve both the business and tourist markets and support the cultural and commercial strategies for the Proposed Development. It would accord with the Development Plans, which support business growth and the visitor economy in highly accessible locations and promotes the Opportunity Area as a visitor destination, which RBKC and LBHF Local Plan site allocations also identify as being suitable for non-residential uses, such as hotels, that can support the creation of a sustainable and balanced community on the Site.

Social Infrastructure (Community, Health and Education)

Relevant Policy Context

- 7.148. The following planning policies are of relevance to this section:

Policy Document	Policy or Para. Reference / Title
London Plan	<ul style="list-style-type: none"> - Policy SD6: Town Centres and High Streets - Policy SD7: Town Centres development principles - Policy SD8: Town Centre Network - Policy D1: London's form, character and capacity for growth - Policy H13(a2): Specialist older persons housing - S1: Developing London's Social Infrastructure -
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CV1: Vision for the Borough
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy SI1: Social infrastructure and facilities - Policy T6(b): Active Travel
LBHF Local Plan	<ul style="list-style-type: none"> - Policy CF2: Enhancement and retention of community uses

Assessment

- 7.149. NPPF para. 93 encourages the delivery of shared spaces and community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings and public houses) and other local services to enhance the sustainability of communities and residential environments.
- 7.150. London Plan Policy S1 states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported (Part C). London Plan Policy S2 ('Health and social care facilities') states that development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported (Part B). London Plan Policy S3 ('Education and childcare facilities') states that boroughs should ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need (Part A 3).
- 7.151. There is also an expectation under the RBKC and LBHF Local Plan site allocations for social infrastructure uses to come forward on the Site.
- 7.152. The Proposed Development includes flexibility for a range of social infrastructure facilities to be delivered on Site to ensure the development makes an important contribution towards meeting local needs.
- 7.153. A maximum of 45,000 sqm (GEA) of education (Class E (f) / F1 (a)) floorspace is proposed across the Outline Components of the Hybrid Applications, with up to 20,000 sqm in RBKC and 25,000 sqm in LBHF, the majority of which will form part of the Outline Components.
- 7.154. There is no other education floorspace included in the Illustrative Masterplan and no requirement for primary or secondary school education floorspace is required based on the findings of the Socio-Economic ES Chapter, but allowance is made to enable education floorspace to come forward in defined Development Zones as specified in the Development Specification to meet future demand should this arise. This would most likely come forward as Higher Education use but could come forwards as a school or other educational facility should the opportunity arise. Socio-economic analysis has shown the existing provision of schools in the area is sufficient to accommodate the current local population in addition to the anticipated child yield as a result of the Proposed Development.
- 7.155. A maximum of 75,000 sqm (GEA) of health / Older Persons Housing floorspace (within Class C2) is proposed, comprising up to 35,000 sqm in RBKC and 40,000 sqm in LBHF, across the Outline Components of the two Hybrid Applications. The provision of Older Persons Housing on the Site has been considered under the housing section above, but this allows for the potential for medical services, which could include a small hospital, to come forward as part of this floorspace allowance should there be demand for this in future. ECDC will continue to engage with RBKC and LBHF and the National Health Service

(“NHS”) in relation to future requirements for health facilities (such as a GP surgery) to be provided on-Site.

- 7.156. A maximum of 4,000 sqm (GEA) of community / social infrastructure floorspace (Class F / E(e)/(f)/(g) / Sui Generis) is proposed across the two Hybrid Applications, comprising 2,000 sqm in RBKC and 2,000 sqm in LBHF. The majority of this floorspace is within the Outline Components, other than a 502 sqm (Class F2) Community Hub, which is proposed as part of the ground floor of WB05 within the LBHF Detailed Component. This would provide a flexible space for uses such as a community café, education hub and other spaces available for use by the local community.
- 7.157. Within the RBKC Detailed Component, a 340 sqm (Class E (F)) nursery is located within the ground floor of EC06, facing on to The Table, providing a key piece of social infrastructure for the new mixed use neighbourhood. The delivery of the nursery would meet the need for early years provision identified under RBKC’s draft site allocation SA2.
- 7.158. With regard to provision within the Early Phases, in addition to the spaces which will come forward as part of the RBKC and LBHF Detailed Components, social infrastructure and community floorspace would be delivered proportionate to the scale of residential and commercial floorspace to be delivered. This could include provision of a new Community facility adjacent to Aisgill Avenue and a financial contribution towards upgrading of the existing Multi Use Games Area (“MUGA”).
- 7.159. The Proposed Development includes a mix of health, education and community floorspace that can deliver a range of facilities across the Site to contribute the creation of a mixed and balanced community, in accordance with relevant planning policy and in accordance with the conclusions of the Socio-Economic ES Chapter.

Storage and Distribution

Relevant Policy Context

- 7.160. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Para. 87 notes that planning policies and decisions should recognise and address the specific locational requirements of different sectors, which includes storage and distribution operations at a variety of scales and accessible locations.
London Plan	<ul style="list-style-type: none"> - Policy E2: Providing suitable business space - Policy E3: Affordable workspace - Policy E4: Land for industry, logistics and services to support London’s economic function - Policy E7: Industrial intensification, co-location and substitution

RBKC Adopted Local Plan	- Policy CF5: Business use
RBKC Draft Local Plan	- Policy BC1: Business use
LBHF Local Plan	- Policy E2: Land and premises for employment uses - Industrial Strategy (2017)

Assessment

- 7.161. The NPPF supports building “*a strong, responsive and competitive economy*” (para. 8). In addition, the NPPF states that “*planning decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.*” (paragraph 87).
- 7.162. London Plan Policies E4 and SD4 also recognise the importance of providing land for distribution and logistics use, while the draft RBKC Local Plan recognises the amount of storage and distribution space is “*dwindling and under pressure from changes of use*” (para. 6.17).
- 7.163. To allow for the potential to meet this identified need for storage and distribution land uses, a maximum of 16,000 sqm (GEA) of Use Class B8 (storage and distribution) floorspace is proposed across the Outline Components of the two Hybrid Applications, with up to 6,000 sqm in RBKC and 10,000 sqm in LBHF.
- 7.164. The precise mix and nature of these uses is not known at this stage in terms of their quantum, but an allowance is included in specified Development Zones within the submitted Development Specification and Land Use Parameter Plans to allow the potential for them to come forward as part of applications for RMA, where they would be assessed in relation to their impacts and benefits prior to RMA approval being granted.
- 7.165. Possible uses proposed within this Use Class could include warehousing or other storage, as well as logistics and data centre uses. One potential option, which is included in the Illustrative Masterplan, is a last mile logistics facility in Plot EC07. This would be a rare opportunity to deliver a purpose built logistics space in inner London that would have the potential to reduce vehicular movements within the wider neighbourhood. This is shown in further detail within the submitted DAS Volume 1: Outline Component.
- 7.166. The key drivers for exploring the inclusion of a commercial logistics hub as part of the Proposed Development are:
- Replacing vehicle trips on the local highway with sustainable delivery modes
 - Improving air quality on-site and within the local area
 - Reducing carbon emissions per package delivered on-site and within the local area.

- 7.167. There is ever-growing demand for efficient and sustainable last mile logistics solutions and the need is particularly acute in this part of London. The provision of such a facility in this location is supported by the London Plan (including Policy E4), the Mayor’s Transport Strategy and the Local Plan Site Allocation, which requires delivery of non-residential floorspace at the Site to help meet local needs create a sustainable and balanced community.
- 7.168. Whilst there is no data centre floorspace envisaged in the Illustrative Masterplan, there is an ability for data centre floorspace to come forward in defined Development Zones as specified in the Development Specification and the Land Use Parameter Plans on certain flexible plots.
- 7.169. This is explored in further detail within the submitted DAS Volume 1: Outline Component which demonstrates a data centre use could be considered appropriate in certain flexible plots (e.g. EC20, WK02/04, WK03 and WK06).
- 7.170. The UK’s National Data Strategy (2020) (“NDS”) aims to foster the growth of the sector across the UK, which is identified as providing a catalyst for wider economic growth. This is in response to rapid changes in technology and a trend towards automation and embedded connectivity that is shaping social and economic activity; these changes are driving a significant increase in the amount of data being produced, stored and accessed.
- 7.171. This potential provision of storage and distribution floorspace on the Site accords with the direction of planning policy at all levels to provide land for those uses that will help to meet local needs. It is recognised that further details and assessments would need to be provided in relation to actual uses and activities proposed within the Use Class B8 category in due course, as part of any related RMA submission. This would be controlled via appropriately worded conditions.

Other Sui Generis Uses

Relevant Policy Context

- 7.172. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	- Para.128c notes that planning policies and decisions should support development that makes effective use of land
London Plan	- Policy GG1f: Building strong and inclusive communities - Policy E9: Retail, markets and hot food takeaways - Policy HC5: Supporting London’s culture and creative industries - Policy HC6: Supporting the night-time economy - Policy HC7: Protecting public houses
RBKC Adopted Local Plan	- Policy CA4: Earl’s Court Exhibition Centre - Policy CO2: Strategic objective for fostering vitality

RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy SA2: Earl’s Court Exhibition Centre - Policy TC4: The evening economy - Policy TC7: Art and culture uses
LBHF Local Plan	<ul style="list-style-type: none"> - Policy FRA1: Earl’s Court and West Kensington Opportunity Area

Assessment

- 7.173. RBKC and LBHF site allocations allow for the provision of a mix of non-residential uses. The Proposed Development includes an allowance within the RBKC and LBHF Outline Components for a range of potential Sui Generis land uses to come forward. These are listed in the descriptions of development in Chapter 4 of this Statement and defined in the submitted Development Specification.
- 7.174. These uses are included to complement the range of non-residential uses that are defined by other Use Classes and because uses such as cinemas, drinking establishments, theatres and nightclubs could form part of the Retail, Cultural and Commercial Strategies for the redevelopment of the Site. The benefits associated with those uses, and an assessment of their suitability for a particular location within a Development Zone or Plot will be considered at the RMA stage, taking account of the composition of neighbouring land uses.
- 7.175. The potential mix of proposed Sui Generis uses can combine with other proposed uses (particularly retail, leisure and culture) to support the needs of the Development and the area as a whole, and contribute to the creation of active, vibrant and attractive ground floor frontages onto the public realm, in accordance with planning policy objectives for the Site, in accordance with the site allocations for the redevelopment of the Site. It is envisaged that specific requirements for greater detail and assessments relating to Sui Generis uses would be controlled via appropriately worded planning conditions.

Design

Relevant Policy Context

- 7.176. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Para. 123: making as much use as possible of previously developed brownfield land and give substantial weight to the value of using suitable brownfield land to meet identified needs for housing - Para.128: decisions should support development that makes efficient use of land. - Chapter 12: Achieving well-designed and beautiful places. - Para. 131 considers that the creation of high quality, beautiful and sustainable buildings and places is

	<p>fundamental to what the planning and development process should achieve, with good design being a key aspect of sustainable development.</p> <ul style="list-style-type: none"> - Para. 135 sets out a list of requirements developments must achieve to secure quality, respect heritage, and establish successful and safe places. - Para.137 outlines that design should be considered throughout the evolution and assessment of the proposals, encouraging pre-application discussions with the Council and local community.
<p>National Model Design Code (“NMDC”)</p>	<ul style="list-style-type: none"> - The need for well-designed places is outlined in the MNDC which looks to achieve “beautiful, enduring and successful places”. - Sets out guidance on how to achieve well-designed places, including built form and well-designed homes and buildings. - Successful developments are considered to provide good quality internal and external environments, relate positively to the spaces around them promoting interaction and inclusion and are well integrated into their neighbourhoods. Built form should also be determined by good urban design principles that combine layout, form and scale which responds positively to its context. - Well-designed places can have compact forms of development which make places easily accessible, makes the efficient use of land and optimises density.
<p>London Plan</p>	<ul style="list-style-type: none"> - Policy GG1: Building strong and inclusive communities - Policy GG2: Making the best use of the land - Policy D1: London’s form, character and capacity for growth - Policy D2: Infrastructure requirements for sustainable densities - Policy D3: Optimising site capacity through the design-led approach - Policy D4: Delivering good design - Policy D5: Inclusive design - Policy D6: Housing quality and design standards - Policy D8: Public Realm - Policy D9: Tall Buildings - Policy D3: Optimising site capacity through the design-led approach - Policy H10: Housing size mix - Policy S6: Public toilets - Housing Design Standards LPG <ul style="list-style-type: none"> - Standard A1.4: Response to context - Standard A1.16: Response to context - Standard A2.2: Land use mix - Standard B.1: Entrance and approach - Standard B9.1-3, 5-7: Shared outside amenity space - Standard C10.1: Private outside space

	<ul style="list-style-type: none"> - Standard C10.3: Private outside space - Housing Standards SPG <ul style="list-style-type: none"> - Standard 7: mixed and large developments - Standard 26-27: Private open space - Growth and Characterisation LPG - Optimising Site Capacity: The Design-led Approach LPG
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CL1: Context and Character - Policy CL2: Design quality - Policy CL10: shopfronts - Policy CL11: Views - Policy CL12: Building Heights - Policy CH1: Increasing housing supply - Policy CH2: Affordable Housing - Policy CH3: Housing size and mix
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy CD1: Context and Character - Policy CD2: Design quality, character and growth - Policy CD7: Tall buildings - Policy CD14: Views - Policy CD15: Fire Safety - Policy CD2: Design quality, design and growth - Policy HO3: Community Housing - Policy HO4: Housing size and standards - Policy HO5: Specialist housing - Policy SA2: Earl's Court Exhibition Centre - Policy PLV1: Earl's Court Opportunity Area - Policy PLV14: Earl's Court
RBKC Supplementary Planning Documents	<ul style="list-style-type: none"> - Earl's Court Placemaking Framework requires development to take a 'public realm first' approach. This should be achieved through placing the landscape before buildings, working with natural systems and the inherited landscape and the creation of open space for everyone.
LBHF Local Plan	<ul style="list-style-type: none"> - Policy DC1: Built Environment - Policy DC2: Design of new build - Policy DC3: Tall Buildings - Policy DC5: Shopfronts - Policy DC7: Views and Landmarks - Policy HO4: Housing Quality and Density - Policy HO5: Mousing mix - Policy HO6: Accessible housing - Policy HO7: Meeting the needs of people who need care and support - Policy HO9: Student Accommodation - Policy HO11: Detailed Residential Standards
LBHF Supplementary Planning Documents	<ul style="list-style-type: none"> - Earl's Court Placemaking Framework <ul style="list-style-type: none"> - Part 3.1D, relating to completing Earl's Court, requires the design of any building over 10 stories

	<p>to be of exceptional quality, including their sustainable and innovative design and construction methods.</p> <ul style="list-style-type: none"> - Part 3.1F, relating to completing Earl's Court, and requires the use of Design Codes with specific, detailed parameters to be produced and submitted as part of a planning application. - LBHF Planning Guidance Document <ul style="list-style-type: none"> - Key Principle DA4: Public realm and open spaces - Key Principle HS1: Amenity Space
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High Quality Design and Design-Led Process

Assessment

- 7.177. Achieving high-quality design is an overarching objective for new development at all levels of the planning policy framework.
- 7.178. The London Plan promotes development of the highest architectural quality and Chapter 3 focuses on policies relating to design and how this can lead to 'Good Growth'. Policy D1 requires development to respond to local context by delivering buildings and spaces that are positioned and are of a scale, appearance and shape that responds successfully to the identity and character of the locality. Policy D3 requires development to make the best use of land by following the design-led approach. Policy D4 supports the use of masterplans and design codes to help bring forward development and ensure it delivers high quality design and place-making, as well as requiring DASs to be submitted with development proposals to demonstrate that it meets the design requirements of the London Plan. Policy D5 requires developments to deliver inclusive environments that meet the needs of all Londoners.
- 7.179. The Optimising Site Capacity: A Design-led approach LPG provides guidance as to how the design-led approach set out in London Plan Policy D3 should be applied. It defines optimising site capacity as ensuring that development is of the most appropriate form and land use for a site. The approach set out in the LPG is a process of setting site-specific design parameters and codes for development sites to provide clarity over future design and should be used to determine the most appropriate form of development for a site.
- 7.180. The Characterisation and Growth LPG provides guidance in support of Policy D1 on how to carry out area character assessments (or studies). The LPG sets out that this assessment should be used to inform an area's growth strategy, setting out how it will change in the future, including identifying if and where there are locations where tall buildings may be appropriate. Characterisation of an area or site forms Stage 1 of the design-led process set out in the Optimising Site Capacity: A Design-led approach LPG.
- 7.181. RBKC Local Plan Policy CL1 states that the Council will require all development to respect existing context, character and appearance and Policy CL2 requires all development to be of the highest architectural and urban design quality, taking opportunities to improve the quality and character of buildings and the area and the way it functions.

- 7.182. Draft RBKC Local Plan Policy CD1 requires (Part A) development to be beautiful, respecting the existing context, character and appearance, including historic characteristics and (Part C) the density of development to be optimised using a design-led approach in a manner sensitive to context.
- 7.183. The RBKC Earl's Court Opportunity Area Placemaking Framework SPD is organised around four placemaking priorities for the RBKC Hybrid Application Site, which have informed draft RBKC Local Plan Policy SA2:
- Public Realm First
 - Exemplar of environmental sustainability
 - Part of the city
 - Varied and rich urban life
- 7.184. These priorities are further divided into a number of more specific principles and detailed criteria.
- 7.185. LBHF Local Plan Policy DC1 (Built Environment) requires all development within the borough to create a high-quality urban environment that respects and enhances its townscape context and heritage assets. There should be an approach to accessible and inclusive urban design that demonstrates how good design, quality public realm, landscaping, heritage assets and land use can be integrated to help regenerate places.
- 7.186. This sub-section summarises the design-led process undertaken, sets out a response to national, regional and local planning policy design objectives and should be read in conjunction with a number of other application documents including the Control Documents, ES Volume 1 and 2 Chapters and DASs (Volume 1: Outline Component, Volume 2: RBKC Detailed Component and Volume 3: LBHF Detailed Component) which describe the design approach to the Outline and Detailed Components of the Proposed Development.
- 7.187. As set out in Chapter 4 of this Statement and the submitted SCI, the Proposed Development has been subject to extensive engagement with local and statutory stakeholders from the beginning of the design process.
- 7.188. The design-led approach sought by the Optimising Capacity: Design-led Approach LPG and required by London Plan Policy D3 and RBKC Draft Local Plan Policy CD1, has been adopted from the outset to develop the Proposed Development. The placemaking priorities of the RBKC Placemaking Framework SPD have also informed design development from an early stage. This has meant responding to the existing character and distinctiveness of the surrounding context whilst balancing the need for growth.
- 7.189. As required by London Plan D4, the DAS Volume 1: Outline Component sets out the processes undertaken to inform the design of the Proposed Development, with a focus on the Outline Components. It explains how site-wide design strategies have been developed and evolved, how the LPG processes have been applied and London Plan and Local Plan design policies addressed.

- 7.190. The DAS Volume 1: Outline Component also describes the Illustrative Masterplan, which represents one way in which the Proposed Development could come forward within the parameters set by the three Control Documents (the use of which is supported by London Plan D4 to guide future development). The Control Documents create a set of 'rules' that will guide future RMA applications. These rules will ensure a high-quality design is achieved throughout the Proposed Development. The DAS Volume 1: Outline Component explains the process and principles which underpin these Control Documents and provides more detail about the types of places and buildings that will be created, supplemented by Plot-related design studies to show how Development Zones identified for different uses could come forward in different ways through the RMA process depending on the final land use mix proposed.
- 7.191. The DAS Volume 2: RBKC Detailed Component and DAS Volume 3: LBHF Detailed Component set out how the Detailed Components (Plots EC05, EC06 and Plots WB03, WB04 and WB05) have followed the design-led approach, built upon the site-wide analysis undertaken as part of the preparation of the site-wide design principles described in the Design Code and deliver on the Site's vision by creating high quality places and buildings. The DAS documents (Volume 2: RBKC Detailed Component and Volume 3: LBHF Detailed Component) demonstrate compliance with relevant London Plan and Local Plan design policies.

Adopting the design-led approach

Design-led approach Stage 1

- 7.192. Adopting the approach to site analysis set out in the Characterisation and Growth LPG and London Plan Policy D1 allowed for an informed assessment of the character of the Site and its context, as well as highlighting constraints and opportunities relevant to future development, which was also informed by community engagement. The assessment provided a baseline for which the capacity for change and growth at the Site could be established.
- 7.193. As set out in the DAS Volume 1: Outline Component, the site analysis concluded that the Site was not, in its current form, optimising its potential and represented a 'Transform Area' (as defined in the LPG – *'these are areas that have a low-quality, poorly defined character and/or where an opportunity exists to establish a new coherent character by enhancing positive elements'*). The evaluation also identified an extensive potential for growth at the Site.
- 7.194. Whilst a high sensitivity to change was identified by the analysis, this change has the potential to be positive in respect of the key character areas; environmental, social and economic. The analysis did acknowledge that there is a sensitive heritage context within the wider area, which would have to be carefully addressed as part of the design process.

Design-led approach Stage 2

7.195. Building upon the site analysis and stakeholder engagement, this process led to the development of a site-specific design vision, which is underpinned by 4 'Priorities' and 4 'Place Pillars':

- Priority 1: Open up the former exhibition site for the first time on 150 years
 - Priority 2: A showground of worldclass ingenuity – celebrating its legacy and history
 - Priority 3: Create a better piece of city – a blueprint for future generations
 - Priority 4: Addressing the climate change emergency – an ambition to go beyond net zero
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- Place Pillar 1: Nature – a celebration of nature and its ability to connect and revive
 - Place Pillar 2: Innovation – a showcase for climate and clean innovation
 - Place Pillar 3: Culture – A cultural ecosystem for the future of talent
 - Place Pillar 4: Neighbourhood – an inspiring neighbourhood for all stage of life

7.196. The design vision was developed in collaboration with local communities, statutory stakeholders, whilst being informed by the constraints and opportunities identified as part of the Stage 1 site analysis, as well as the requirements of the planning policy framework.

Design-led approach Stage 3

7.197. The Stage 1 site analysis and Stage 2 vision identification informed the development of draft layouts, parameters, design code and initial development of character areas for the Site. These informed the development of an Illustrative Masterplan. Initial design development during this stage can be summarised under the following themes:

1. Nature and open space:

- Creation of a destination public realm, anchored by a central open green space, The Table, using the retained Table structure to create an experiential level change in the centre of the Site
- Proposed repurposing of the Train Shed and creation of Lillie Sidings Square as important anchors north of The Table
- Threshold squares marking entrances into the Site, playing a key role in inviting people in and mitigating air quality
- Aisgill Gardens acting as a vital interface with the West Kensington and Gibbs Green estates

2. Movement hierarchy:

- Prioritisation of pedestrian and cyclists
- A north-south connection between Empress Place and West Kensington station
- An east-west connection that navigates the levels and links Earl's Court station to Aisgill Avenue
- The Table playing a key role in enabling movement across the Site and over the WLL
- Car movement being restricted in the centre of the Site
- A peripheral street network enabling vehicle movement and servicing

3. Uses and clusters:

- Three cultural venues anchoring the heart of the Site
- Three workplace clusters establishing strong gateways near the stations
- Early development of the housing mix included early thoughts about the location of BtR, student, family, affordable and older persons homes

4. Built form and townscape:

- Two clusters of tall buildings were established, framing the Table and along West Cromwell Road
- Alternative massing and height distribution studies were explored, balancing density and open space, in response to microclimate testing and townscape views

Design-led approach Stage 4

7.198. The design team continued to test the draft site-based parameters and site capacity options through extensive pre-application discussions and technical assessments, including assessing different typologies of built form and 3d modelling of the Proposed Development within local, mid-range and long views, having regard to townscape and heritage receptors. The design development can be summarised as:

1. Nature and open space:

- Ongoing development of an inclusive public realm network and central park at The Table, and crafting level changes west of the Table to activate the route from Empress Place
- Greater specificity to ambitions for inclusive and diverse open spaces, and refining the ecology and biodiversity strategy
- Development of Aisgill Gardens as a focal community open space offering play areas. The PRIP played a key role in defining the brief for this space

2. Movement and hierarchy:

- The north-south boulevard became a key route enlivened by the Table and Lillie Sidings Square
- The east-west route took shape as the design team iterated approaches to the changing levels
- The street hierarchy was refined to support a car-free inner network with vehicular movement relegated to peripheral routes

3. Uses and clusters:

- Cultural venues were positioned to reinforce north-south and east-west routes
- Cultural venues were located at the base of buildings visible along key routes, as well as at the Train Shed
- Discussions with RBKC and LBHF and input from commercial consultants informed the scale and nature of the three commercial clusters

4. Built form and townscape:

- Aiming for an equitable height distribution between RBKC and LBHF

- Exploring a triangular 'pivot' building formed a tall building landmark next to the Table Park
- Massing and height distribution studies, balancing density and open space, in response to townscape and heritage analysis and views testing
- Detail plot architects brought more specificity to the design of tall buildings and ground floor uses along key public spaces

7.199. The role of the Illustrative Masterplan throughout this period was as a vehicle for continual testing, whilst directly informing Design Code and Parameter Plan preparation. The Illustrative Masterplan and Control Documents have been shaped and adjusted to reflect feedback received during the consultation process. This process included meetings and workshops with RBKC and LBHF planning and design officers, presentations and reviews by the LBHF DRP and the RBKC QRP. The Proposed Development was also subject to pre-application engagement with GLA and Historic England officers, the GLA Design Unit and 6 LRP meetings and a London Advisory Committee ("LAC") meeting.

7.200. The outcome of the above process was the determination of the Site's optimal capacity and clarification of the design intention for the Site that would be captured in the Control Documents. Five significant design moves were made in response to stakeholder engagement and are summarised below:

1. 20% more open space:

- Buildings moved back on The Table and at Lillie Sidings Square
- A new pedestrian and ecological link from West Brompton station to The Table (subject to Network Rail agreement)

2. Reducing density:

- Quantum of development reduced by 10%
- Fewer Tall Buildings and clearer reading of skyline
- A single landmark tower of exceptional quality

3. Infrastructure for long-term sustainability:

- The Applicant has committed to developing a robust energy strategy that will deliver zero operational carbon from the outset and is designed to allow for the addition of new technologies and low or zero carbon energy sources as they are developed or become available. This will future-proof the low carbon aspirations of the development, while delivering energy security. Homes will be designed to Passivhaus principles, the most sustainable housing standard, using high levels of insulation, air tightness and energy saving technology.

4. Maturing a sense of place:

- Definition of a strategy to attract creativity and innovation to Earls Court through a variety of cultural spaces and three innovation clusters targeted at clean and climate technologies, bringing new businesses and jobs

5. Creating London Streets:

- Focusing on refining the character and design of public spaces for all, the Design Team widened and straightened streets and squares and created accessible routes even across large level changes

7.201. As noted above, the extent of the Detailed Components of the Proposed Development was established. The LBHF and RBKC Detailed Components were defined to demonstrate design intent for the wider masterplan, but particularly in order to set out the architectural quality required to justify tall buildings and their central location within the Site which supports the Applicant's commitment to deliver east/west connections from the earliest opportunity.

7.202. The design process undertaken by the Applicant Team is summarised in the DAS Volume 2: RBKC Detailed Component (Plot EC05 and EC06) and the DAS Volume 3: LBHF Detailed Component (Plot WB03, WB04 and WB05). In both cases the Applicant Team built upon the design-led approach undertaken as part of the wider Site. The emerging plans for both Detailed Components were subject to significant engagement with the GLA, including the LRP, both Boroughs, including the LBTH DRP and the RBKC QRP, as well as public engagement (see Statement of community involvement).

Design-led approach Stage 5 and assessment

7.203. As part of this stage of the process, the Control Documents and the Detailed Component designs were finalised.

7.204. The design principles for the Proposed Development resulting from the design-led approach are:

- Landscape-led site layout, providing accessible public open space for people to enjoy and connect with nature
- Connecting the local area by 'opening up' and 'stitching in'
- Creating the place by curating a mix of enduring uses that will ensure the Site is lively and vibrant throughout the day, night and week
- Using circular economy principles to turn constraints into opportunities and re-using existing structure where possible
- A contextual response to building massing and location that is sensitive to townscape and heritage conditions with a range of building typologies
- Seven Character Areas that draw from the existing neighbouring context to form one coherent neighbourhood made up of individual identities.

7.205. The design of the Proposed Development is the result of extensive review and refinement, having been well considered and developed in line with the design-led approach and in consultation with LBHF, RBKC, the GLA, the local community and other relevant stakeholders.

7.206. The Proposed Development has evolved based on a detailed understanding of the Site and the surrounding context. The Proposed Development is considered to be well-designed and as a result of the rules of the Control Documents will deliver a 'beautiful place'. It will relate well to the Site's existing context and the overarching ambitions for the wider Opportunity Area, Borough Site Allocations and Placemaking SPD Priorities. It accords with existing and emerging design-focussed planning policy at national, regional and local level for the following reasons:

- The Proposed Development is based on a coherent landscape-led design with a legible movement framework that would stitch an existing, underused, brownfield site into the urban grain of the area by creating new routes through a Site with no existing permeability or connectivity, removing a historic severance. Within the Proposed Development a distinctive new elevated open space, The Table will be located at the heart of the Site, based upon utilising retained structure and using site levels as an opportunity rather than constraint. Smaller areas of new public realm will be created in key locations of orientation within and on the edges/entrances of the Site where it interfaces with the surrounding context, helping welcome people to the Site and 'knitting' into the surrounding urban grain. The Proposed Development would repair the edges of the Site where it interfaces with the adjacent townscape, better defining existing fragmented streetscapes to Lillie Road and West Cromwell Road and creating a more permeable relationship with the Gibbs Green and West Kensington Estates to the west.
- The Proposed Development optimises site capacity through a design-led approach in accordance with London Plan Policy D3 and the Optimising Site Capacity LPG. It will respond to local character and distinctiveness where appropriate, improving the physical character of the Site through place making, while creating a new urban character within the Site that reflects the higher density development required to optimise site capacity in accordance with London Plan Policy D3 and Local Plan site allocations.
- The site analysis, engagement and testing undertaken has informed the design of the Proposed Development, which is captured in the Control Documents and Detailed Components. The Control Documents will guide future applications for RMA and ensure the existing context, character and appearance, including historic characteristics of the wider area are respected and that the Proposed Development will be 'beautiful', landscape-led, represent an exemplar of sustainability, part of the city and provide a varied and rich urban life for future residents and the existing community. The Proposed Development will secure the highest quality of design through the Design Code and this design intent is clearly demonstrated by the high quality shown within Illustrative Masterplan and embodied by the Detailed Components.

7.207. The Proposed Development therefore accords with London Plan Policy D1, D2, D3, D4, LBHF Local Plan Policies DC1 and DC2, RBKC Local Plan Policy CL1, Cl2 and CD1, draft RBKC Local Plan Policy CD1, CD2 and the Earl's Court Placemaking SPD.

RBKC Detailed Component Summary

- 7.208. The design of the RBKC Detailed Component respects the existing context, character and appearance of the surrounding area and takes the opportunity to improve the quality of the area and the way it functions, including being inclusive for all users
- 7.209. The RBKC Detailed Component buildings (Plots EC05 and EC06) manage the change in Site level between The Table and lower Crescent. Between Plots EC05 and EC06 the public realm will extend to Warwick Crescent via a considerably landscaped area (Warwick Walk) with playspace, steps, and a public lift, between the levels. The design and articulation for both buildings has evolved in parallel (with consideration also given the adjacent Outline Component Plots) to ensure the buildings read as a family of buildings.
- 7.210. Plot EC05 is a 20 storey residential-led building, designed with a clearly articulated base middle, and crown and a sculpted form. At its base Plot EC05 would provide active frontages through restaurant/café uses facing the upper ground level of The Table Park. The primary residential entrances would be visible and identifiable from the street and are located from the lower ground level on Warwick Crescent, which is proposed as a calm, tree-lined residential street (access is also provided to the Table elevation). A courtyard garden and roof terraces will provide amenity for future residents.
- 7.211. Plot EC05's design has been informed by Art Deco tower typologies, referencing the language of the former Earls Court Exhibition Centre that once occupied the Site. Slenderness of its massing will be emphasised through limestone piers with green toned balconies and spandrels creating a secondary horizontal grid that is carried through into the midrise shoulder part of building in buff brick.
- 7.212. Plot EC06 is a 27 storey a residential-led building, clad predominantly in brick, with a triangular plan, forming the 'prow' of development at the northern end of Warwick Crescent. It would provide a nursery at the lower ground level facing The Table and workspace facing the Crescent. The primary residential entrances would be visible and identifiable from the Crescent with additional entrances located onto Warwick Walk. Like Plot EC05, it would have a sculpted form and familial Art Deco language. The articulation of base, middle and crown would be accentuated through material changes. Balconies would be grouped on three of the five faces creating a contrasting rhythm of balcony, wall, balcony, which would differentiate the various faces of the building, accentuating the building's slenderness.
- 7.213. The built form contributes positively to the townscape and responds to the local context through the architecture and urban form of both buildings, including the approach to scale, street form and materiality to ensure the density of development is optimised while remaining sensitive to its context. The shoulder plots, situated along Warwick Crescent to the north and connecting masterplan plots, have been subject to design refinement to ensure they read strongly and respect the character of Crescent.
- 7.214. The architectural design influences take on board the Placemaking Framework SPD principles for contextual referencing, as well as drawing from the stylistic ideas of the former Exhibition Centre building and other art deco buildings in the borough. These have been

complemented with references to the early American tradition for skyscrapers. As demonstrated in the DAS Volume 2: RBKC Detailed Component, both buildings contained within Plot EC05 and Plot EC06 draw upon the architectural precedents that are prevalent in the local area, including the proportions of buildings and their openings. Both buildings include features, details and materials that have resonance with the surrounding area. The result is the creation of a positive and coherent identity that residents and local communities can identify with.

- 7.215. The RBKC Detailed Component will deliver a high quality, beautiful and sustainable part of the Proposed Development that respects the existing context, character and appearance, including historic characteristics of the Borough and wider area, in line with London Plan Policy D1, D2, D3, D4 and RBKC Local Plan Policy CL1 and CL2, NLPR Policy CD1 and CD2 and the priorities of the Placemaking SPD Policies, by applying the London Plan principle for Good Growth through a design-led approach.

LBHF Detailed Component Summary

- 7.216. The design of the LBHF Detailed Component respects the character and appearance of the surrounding area and takes the opportunity to improve the quality of the Site and the way it functions, including being inclusive for all users, as is demonstrated by the drawings for approval and DAS Volume 3: LBHF Detailed Component.
- 7.217. Each of three Detailed Component Development Plots (WB03, WB04 and WB05) share some critical ideas from architectural precedents: softness and curvature, verticality, and stepped tops. This shared language gives the buildings a coherent cluster resemblance. However, each building has a particular programme and tenure, which is reflected in their particularities and differences. The result is a family of forms with distinct personalities with resonance with the history of the site itself.
- 7.218. Plot WB03, containing PBSA, designed by Serie, would at 33 storeys, be broadly equivalent in height to the adjacent Empress State Building. The appearance of Plot WB03, in particular its curved forms, verticality and stepped crown would deliver a distinct character but one that would be complementary to the Empress State Building and the adjacent WB04 plot. To create a slender form, the corners of Plot WB03 would be chamfered and the resulting facades articulated with deep vertical shadow gaps. A slate blue tone to the cladding at the curved prows of the building (containing shared amenity/living spaces), would contrast with the light stone colour of the cladding to the main façade areas. The crown of the building has been subject to significant design evolution and now is considered to have the correct balance and prominence.
- 7.219. Plot WB04, designed by Sheppard Robson, would be the tallest building within the Proposed Development at 42 storeys, containing residential homes and a mix of ground floor commercial uses. It will be the focal point of the central tall building cluster, located at a pivotal point in the Proposed Development where new east-west and north-south routes cross at The Table and marking the focal point of the central tall building cluster within the Site.

- 7.220. The mass of Plot WB04 has been sculpted through pre-application engagement, with the erosion of the outer corners to create verticality and slenderness. Soft curved edges to all the corners would make a smooth transition between the different faces. Its body would be clad in smooth architectural pre-cast material, with deep punched windows and ribbed architectural pre-cast material spandrels, resonating with the wider influence of water as a design concept within the Proposed Development.
- 7.221. Stepping terraces at the upper nine levels would create a more slender top with symmetry on the east and west axes. The steps would gradually reveal a more expressive crown in lighter materials that would reflect the colours of the sky throughout the day and year and create the illusion of the building dematerialising against the sky. Lighting from within would illuminate the crown after dark.
- 7.222. The plinth shared by Plots WB03 and WB04 would have strong horizontal expression, which would act as a counterpoint to the verticality of WB03 and WB04 and continue the height datum of the existing Empress Place streetscape. The podium, through the flexible range of non-residential uses proposed, would deliver active frontages, vitality and vibrancy to The Boulevard onto which it fronts.
- 7.223. Plot WB05, designed by dRMM, lies to the west of WB04 on the western boundary of the Site where it meets the West Kensington and Gibbs Green Estates. It comprises two residential buildings of 17 (Plot WB05-T1) and 9 (Plot WB05-T2) storeys with a shared courtyard between them, and a community space at the base of T2. The scale of the buildings, stepping down from the height of Plot WB04, would create a transition in scale to the existing Estate to the west. The buildings would be anchored by the new public open space of Aisgill Gardens at the entrance into the Proposed Development from the west.
- 7.224. The design of the WB05 buildings would mediate between the estates and the Proposed Development to the East through their massing and architectural treatment. Existing homes on the estate are a dark brown brick, while the masonry of the WB03 and WB04 are light in colour. Plot WB05 buildings are proposed with brick tones that are darker at the base, graduating to a lighter tone at the upper levels. Plot WB05-T1 would, in common with Plots WB03 and WB04, reference the Art Deco language that characterises the tall building cluster, with a strong vertical emphasis through expressed vertical piers and curved metal corner balconies. Plot WB05-T2 would reference mid-rise Art Deco mansion block typologies, with a strong horizontal articulation.
- 7.225. The design of the LBHF Detailed Component accords with London Plan Policy D1, D2, D3, D4 and LBHF Local Plan Policies DC1 and DC2, applying the London Plan principle for Good Growth through a design-led approach to deliver a high quality and sustainable development that respects the existing context, character and appearance, including historic characteristics of the Borough and wider area and will deliver a high quality development.
- 7.226. The following sections assess particular elements of the design of the Proposed Development in further detail.

Landscape and Public Realm, including Urban Greening Factor

Relevant Policy Context

7.227. Alongside the planning policies contained under the ‘Design’ heading, the following policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
London Plan	<ul style="list-style-type: none"> - Policy G1: Green infrastructure - Policy G4: Open Space - Policy G5: Urban Greening - Policy S3: Education and childcare facilities - Policy S4: Play and informal recreation - Housing Design Standards LPG <ul style="list-style-type: none"> - Standard A1.6: Response to the context - Policy A4.4: Public open space, biodiversity and urban greening - Standard A5.1: Inclusion and Accessibility - Housing SPG <ul style="list-style-type: none"> - Requires appropriate play provision in accordance with the Mayor’s Play and Informal Recreation SPG where developments contain an estimated occupancy of 10 or more children. - Shaping Neighbourhoods and Play Informal Recreation SPG <ul style="list-style-type: none"> - Playspace should be well-connected and easily reached by pedestrian/ cycling / bus routes. Enable physical activity and be usable by those with disabilities.
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CR5: Parks, gardens, open spaces and waterways
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy GB15: Green Infrastructure - Policy GB16: Parks, gardens, open spaces and waterways
LBHF Local Plan	<ul style="list-style-type: none"> - Policy OS1: Parks and Open Spaces - Policy OS3: Playspace for children and young people - Policy OS5: Greening of the Borough

7.228. This section should be read in conjunction with the submitted DAS Volume 1: Outline Component, Design Code and ES.

Assessment

7.229. The design of the Proposed Development is landscape-led. This means that a site character assessment has been undertaken at the outset of the design process which has identified

a number of opportunities to deliver improved connectivity, new open space opportunities and increased greening for the Site as part of a process of stitching the development into the surrounding area.

- 7.230. Informed by the design-led approach set out in the section above, the starting point for the Proposed Development was the Place Pillar to ‘amplify nature’; an open space strategy that was based on identifying potential connections through the Site and to the surrounding area, creating a series of interlinked spaces throughout the Site and using retained structure within The Table to create a central space.
- 7.231. With regard to relevant planning policy, London Plan Policy G4 requires development proposals where possible to create areas of publicly accessible open space, particularly in areas of deficiency. LBHF Local Plan Policy OS1 states that the Council will seek to enhance and increase the provision of parks, open spaces and biodiversity in the borough and Policy OS2 seeks to reduce open space deficiency. Key Principle DA4 of the Planning Guidance SPD sets out that *‘Where new public and open spaces/areas are created or enhanced, planning applications should indicate how the interests of disabled people are to be protected’*. RBKC Local Plan Policy CR5 requires major development to provide new publicly accessible open space which is suitable for a range of outdoor activities and users of all ages. This is repeated in Draft Local Plan Policy GB16.
- 7.232. Draft RKBC Local Plan Policy SA2 (Part I) requires the site to provide *‘A new public park measuring around 2 ha to accord with the London Plan size guideline for Local Parks and Open Spaces to provide a focal point for the development to meet the needs of those who will visit, work, and live in the new development’*.
- 7.233. RBKC Earl’s Court Placemaking SPD supports a landscape-led approach to the development of the RBKC site, noting that *“The scheme’s starting point should be the landscape and open space strategy. This should determine the site layout and the character of the streets and spaces that make up the public realm, informed by how nature will work best in this specific location. Opening up routes through early on in the development process will help establish the public realm first, so that people feel invited into the site’*. It goes on to note that *‘Landscape-led also means to be driven by the site’s characteristics, both natural and man-made: working with the level differences, reusing existing structures and incorporating them into the design. This makes a scheme site specific and reduces its impact on the environment’*.
- 7.234. The landscape-led approach to layout and design of the Proposed Development has evolved iteratively as a result of testing and consultation during the design process. As noted in the section above, this included increasing the amount of open space as part of the Proposed Development by 20%, achieved by setting built form further back from The Table and proposing a new pedestrian and ecological link from West Brompton station to The Table (subject to Network Rail agreement).
- 7.235. As a result of adopting a landscape-led approach, the Illustrative Masterplan would deliver an extensive public realm of over 8ha. As set out in the DAS Volume 1: Outline Component, the public realm is formed of a variety of green spaces that support social gatherings, play,

and more contemplative activities at the confluence of key routes. The landscape has been carefully designed to be accessible, fit for purpose and function, be of a high quality and compatible with the surrounding landscape, townscape character and to embrace sustainable design principles. It will provide opportunities for social interaction, play and recreation and address shortfalls of opportunity (as set out in ES Chapter 7) in the wider area.

- 7.236. The existing Site is impermeable and increasing its connectivity both north-south, and east-west across the borough boundary will represent a significant public benefit and has been an important principle of the design of the Proposed Development. New, legible routes north-south from Lillie Road via Empress Place and West Brompton Square to North End Road and the A4, and an east-west route would connect Warwick Road to Aisgill Avenue. These routes, which prioritise walking and cycling, would intersect at the central landscaped Table.
- 7.237. The Table is the centrepiece of the Site and the public open space with which all the Character Areas converge. It unfolds as a sequence of 'Exhibition Gardens' that enhance biodiversity and showcase a variety of planting characters and outdoor uses. This space fulfils the objective of Policy SA2 (Part I) by creating a focal point for the Development.
- 7.238. If retained within the Proposed Development, the surviving northern part of the early 20th century Train Shed within the LBD would form the focal point of a second public open space, known as Lillie Sidings Square. A landscape feature, known as the Cascades, would provide level change between the two primary public spaces where site levels are the most challenging, providing a mixture of water-based landscaped areas at different levels.
- 7.239. Smaller open spaces, such as Warwick Square and Brompton Square, would mark points of entry into the Proposed Development and improve public realm quality at the interfaces of the Proposed Development with the surrounding urban grain. This includes Aisgill Gardens, which will provide amenity and play, acting as a vital interface with the West Kensington and Gibbs Green Estates.
- 7.240. In terms of overall public realm provision, the Illustrative Masterplan includes approximately 8.25ha provision (3.92ha within the RBKC and 4.33ha within the LBHF areas of the Site) with 55% of the Site remaining unbuilt and open once completed. As set out in the Control Documents, The Table open space will provide an area of at least 0.7ha as the central focus of the interconnected network of public open spaces that the Proposed Development will provide, which has been developed through extensive and positive engagement with local stakeholders, DRPs, the GLA and the LPAs. The proposed approach is also consistent with the RBKC Placemaking Framework SPD which notes "*the importance of providing a variety of scale and character of open spaces needed to give people choice in how they spend time outside, and how this contributes to building a sense of community*".
- 7.241. Rather than providing a single public open space (which capacity testing demonstrated would not be preferable for optimising the potential of the Site), the benefits of the proposed strategy include increasing the variety of spaces on offer and the potential activities that could be accommodated, maximising access to play opportunities for future residents,

acting as a tool to enhance permeability and quality of routes, creating 'glimpses' into open spaces from around the wider Opportunity Area, allowing for a softer transition between the Site and neighbouring areas, as well as allowing for a sequential delivery to ensure needs of new and existing population can be met.

Outline Component

- 7.242. In respect of the Outline Component, the majority of public realm is proposed in outline and in respect of future RMAs, the Development Zones, Maximum Building Lines and Public Realm Parameter Plan (ref. 004), confirm the location and extent of the public realm and the Design Code provides guidance to ensure quality of outcome, including details in respect of microclimate; planting; green and blue infrastructure; materiality; and street Furniture.

RBKC Detailed Component

- 7.243. The RBKC Detailed Component includes 'Warwick Walk' an area of public realm and landscaping located between EC05 and EC05 and connecting Warwick Crescent to The Table. This is submitted in Detail. Key constraints and opportunities that have informed the landscape approach for the public realm include the 3.5m level change between the Warwick Crescent finished floor level ("FFL") and the Table FFL requiring a stepped route and a publicly accessible lift to provide a fully accessible design. The adjacent building uses shape the design approach with planted buffers to homes (defensible space) and the key entrance to EC05 is accentuated in the landscape, while planted areas provide some definition to the nursery entrance in EC06.
- 7.244. The design takes the opportunity to build on the site-wide landscape approach in the design language to continue the biodiversity and green connections between The Table and Warwick Crescent and also provides some meaningful doorstep play and amenity within the link adjacent to EC06 to continue the play zone from The Table around the plots.

Accessible and Inclusive Design

- 7.245. The Proposed Development aims to deliver the highest standards of equitable, accessible and inclusive design and these principles have defined the approach to the layout and design of the landscape and public realm, including open spaces.
- 7.246. Championing accessible and inclusive design has been central to the design process. As set out in DASs, ECDC formed the PRIP to engage with those who do not traditionally engage with planning applications. The PRIP involves a diverse range of people, aged 15 and above, who have a range of lived experiences, requirements, and support needs. The panel acted as a critical friend, inputting into the design brief and testing the proposals as they were developed. This included input into the inclusive design priorities and the design codes relating to access and movement, materiality, street furniture and signage over the course of two design code review sessions. The six inclusive design priorities borne out of this engagement are woven into the Proposed Development and through the Control Documents, and include:

1. Legibility and wayfinding: navigation through the Site should be intuitive.
2. Diversity of spaces: there should be a variety of public spaces to reflect the different ways people use, navigate and enjoy the public realm.
3. Movement methods: footpaths and cycleways should be clearly delineated and usable with people with physical impairments.
4. Areas to rest: a variety of seating should be provided for people who have trouble walking long distances, those with neurological difficulties or people who simply need a break.
5. Sensory experience: in line with the focus on nature, features that may overwhelm people with neurological processing or mental health challenges are to be avoided.
6. Safe environment: pathways and entrances should be appropriately lit and designed to foster natural surveillance and address how vulnerable areas, such as at external lifts or less crowded routes, can be made safe.

7.247. The Design Code secures inclusive design priorities through securing high-quality public realm, inclusive playspace, lighting, access and movement strategies, site levels, materiality, public facilities, street furniture and wayfinding.

7.248. The walkable neighbourhood approach to the Proposed Development is justified by the exceptional access to public transport. However, drop off opportunities would be provided within 50m from the entrances to all buildings.

7.249. The public realm will seek to prioritise people and provide accessible and inclusive pedestrian routes throughout the Site. Footpaths will be wide enough to accommodate a wide range of users and have suitable walking surfaces including tactile paving to assist those who are blind or partially sighted. Plentiful resting points including a variety of seating options will be provided where appropriate and at max. 50m intervals.

Changes in level are integrated into the design, with gentle sloping public realm across the majority of the Site. Where level changes are significant, external ramps, stairs and public lifts are proposed. External lifts would be located so that they are readily identifiable and provide the same high-quality experience to everyone.

Urban Greening Factor

7.250. London Plan Policy G5 includes an 'Urban Greening' requirement for new development. The policy requires major development to contribute to the greening of London through the incorporation of measures including landscaping, green roofs and walls, and nature based sustainable drainage. The Urban Greening Factor ("UGF") calculation provides a way of quantifying the contribution new development makes to urban greening. The benchmark required to be achieved for new residential led development is a score of 0.4.

- 7.251. As set out in the submitted Urban Greening Factor Plan, the UGF score resulting from the Proposed Development has been calculated at 0.4, meeting the requirement of Policy G5 and demonstrating the Applicant's commitment to the greening of the Site. The site-wide strategy as described in the submitted Urban Greening Factor Plan report sets a baseline for the Detailed Component Plots in terms of UGF requirements to be met to ensure the Site as a whole is able to deliver on policy targets. The Detailed Component Plots do not include the wider proposed public realm areas which form part of the Outline Component. Notwithstanding, the plots have been designed to maximise greening within their demise. Any individual plot score below the 0.4 UGF target would be captured within future RMA, including the RMA(s) in respect of the wider public realm.
- 7.252. As set out in the Volume 2:DASs both the LBHF and RBKC Detailed Components have maximised greening within the individual plots and each Plot exceed the baseline requirement set out in the Site-wide strategy.
- 7.253. When taken together, the Outline Components and the RBKC and LBHF Detailed Components will deliver a UGF score of 0.4, in accordance with London Plan Policy G5. The Proposed Development would deliver increased greening on the Site, achieving the required UGF targets, the delivery of which is expected to be secured through an appropriately worded s106 obligation.
- 7.254. Further information in relation to areas of proposed public realm is provided on the submitted Development Zones, Maximum Building Lines and Public Realm Parameter Plan (ref. 004), within the Design Code and illustrated in the DAS (Volume 1: Outline Component, Volume 2: RBKC Detailed Component and Volume 3: LBHF Detailed Component). These documents will guide future RMAs to ensure that the proposed landscape is of the highest quality.

Summary

- 7.255. Overall, by adopting a landscape-led approach, the proposed landscape and public realm principles create a permeable and fully accessible site and public realm, responding to the conditions within the existing Site and creating opportunities for connections with neighbouring areas. The Proposed Development develops a clear hierarchy of routes and spaces throughout the Site and provides a wide variety of well-designed public spaces which incorporate high quality materials, well considered landscaping and opportunities for social interaction, play and recreation that take account of the need for inclusivity and ease of accessibility for all. The minimum sitewide UGF score of 0.4 will be secured as a s106 obligation. The Proposed Development complies with London Plan Policy D5, D8 and G5, LBHF Policy OS1, OS2 and RBKC Local Plan Policies CR5 and CR6, draft Local Plan Policies GB16, GB18 and SA2 and the Earl's Court Placemaking SPD.

Density

Assessment

- 7.256. This section focusses on the principles that make the density of the Proposed Development acceptable in this location. The Development Plans relevant to the Site allocates this previously developed, underused brownfield land to make a strategic contribution towards the delivery of new open space, homes and jobs in a mix of land uses. There are few development opportunities of this size in London and the Site is in the most appropriate location for high density development, including tall buildings (see Tall Building Statement below), having regard to not only to its size but also its highly accessible location with access to multiple public transport links. The objectives of planning policy at all levels for development proposals in locations such as this require the Proposed Development to make the most effective use of this previously development, but underused, accessible brownfield Site.
- 7.257. The NPPF (para. 123) directs strategic policies to encourage “as much use as possible” to be made of brownfield land and para. 128 states that decisions should support development that makes efficient use of land, having regard to, inter alia, the identified need for housing and other forms of development and the desirability to promote regeneration and change. The London Plan reflects this approach through its objective to achieve Good Growth by making the best use of land through a design-led process (London Plan Policy D3) that provides good quality, energy efficient and inclusive development that achieves a positive overall contribution to London through its delivery of new homes, jobs, streets, spaces and buildings while preserving local character.
- 7.258. The site allocations set out in adopted and draft RBKC and LBHF Local Plan policy reflect the Opportunity Area designation of the site in identifying it for intensive mixed use of the land assisted by good public transport accessibility. Draft RBKC Local Plan Policy CD1(c) also requires the density of development to be optimised using a design-led approach that is sensitive to context.
- 7.259. Supporting text to London Plan Policy D3 (para. 3.3.22 and 3.3.23) requires a range of measurements to help assess, monitor and compare development proposals. These are aimed at plotting different elements of development density to be submitted with planning applications for information, but this must still be considered in the context of the site and its surroundings. The precise density of the Proposed Development is not definable at this stage due to its partial outline nature and will also not be confirmed until all RMA applications have been approved which set the final approved amount of floorspace and land use mix for the development. However, based on the Illustrative Masterplan, indicative density metrics for dwellings per hectare (dph), Floor Area Ratio (FAR) and Site Coverage Ratio (SCR) can be estimated for information at this stage and are provided in Table 25 below:

Table 25: Indicative Density Metrics			
Metric	RBKC	LBHF	Whole Site
Early Phases			
Dwellings Per Hectare (dph)	137	195	155
Floor Area Ratio (FAR)	3	5.4	3.8
Site Coverage Ratio (SCR)	40%	58%	45%
All Phases			
Dwellings Per Hectare (dph)	137	201	173
Floor Area Ratio (FAR)	3	4.3	3.7
Site Coverage Ratio (SCR)	40%	50%	45%

- 7.260. The design evolution process has demonstrated that the consideration of development density is not simply about quantum of floorspace, as can often be the perception, especially when referring to density metrics such as those set out above. It must be considered alongside the layout and diversity of uses proposed by a development. In the case of the Proposed Development, the landscape-led approach means that over half of the Site will be covered by public realm and open spaces, with buildings arranged around those spaces, connected by a network of streets and spaces that make the development permeable and inclusive so that the services and facilities it provides are easily accessible and so that it encourages a healthy way of life. The configuration of Development Zones and Plots and massing has also been refined to mitigate its impacts and improve the amenity of those who live and work in, or use, the development in future.
- 7.261. The design, heritage and townscape-related sections below and the submitted DASs (Volume 1: Outline Component, Volume 2: RBKC Detailed Component, and Volume 3: LBHF Detailed Component) explain the contextual, landscape and design-led approach that has been taken to explore and optimise the capacity of the Site and establish the appropriate density of the Proposed Development. It has undergone extensive pre-application engagement and design evolution to progress from a strategic framework that has taken account of the varied nature of its surroundings. That framework has evolved through various iterations, which has included an approximately 10% reduction in density of the Proposed Development. This strikes an appropriate balance between delivery of significant public realm and open spaces, around which buildings have been arranged. Buildings optimise floorspace provision, and creation of new homes and jobs, within buildings designed to a high standard of architectural and environmental performance that will collectively create a new piece of London.
- 7.262. The approach to density and its acceptability in the context of relevant planning policy is unchanged in the Early Phases scenario, which has been designed to allow for, and not fetter, the future development of LBD land covered by the later phases.

7.263. Having regard to the above, the density of the Proposed Development is acceptable in the context of planning policy at all levels that seek to make the best use of accessible brownfield land and the Site's London Plan and Local Plan designations to deliver high density mixed use development applying London Plan principles for Good Growth through a design-led approach that will deliver a high quality and sustainable development.

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

7.264. Building heights, scale and massing have been the subject of extensive and careful consideration throughout the pre-application process and the principle of delivering a high density development that includes tall buildings has been accepted by GLA, RBKC and LBHF officers.

7.265. The sections above set out how the design of the Proposed Development has evolved through pre-application engagement and the building height and massing strategy has formed a fundamental part of that process, taking account of heritage, townscape, environmental and placemaking considerations.

7.266. This section considers design-related planning policies regarding building heights, scale and massing. The Proposed Development includes a variety of tall buildings and therefore this section considers the Proposed Development in relation to criteria set out in London Plan Policy D9 in the form of a Tall Building Statement, which is supplemented by further details enclosed in the Policy D9 and LBHF Policy DC3 Compliance Tables at Appendix 2.

7.267. The height and massing strategy of the Proposed Development has developed in accordance with the design-led approach advocated by the London Plan. The landscape-led approach has established a network of public realm and open spaces. The height and massing strategy for buildings to be located within Development Zones has then been arranged around those spaces and driven by the need to optimise its development capacity, while taking account of site constraints, in accordance with the planning policy requirements set out in previous sections. Six principles were established early in the design process to inform the height strategy:

- Respond to primary heritage receptors
- Respond to sensitive edges
- Create a central cluster
- Frame the northern gateway
- Mark important destinations
- Provide a stepped approach

7.268. The approach to scale and massing further evolved through the testing of:

- Heritage and townscape receptors
- Different built form typologies
- Key environmental and townscape indicators to assess the optimum balance of height distribution, public realm provision, pedestrian comfort and residential quality

- 7.269. Further heritage and townscape considerations are set out in the Heritage and Townscape section below, but the outcome of the design evolution process is a height and massing strategy that responds to the Site's context and character analysis, which has been balanced against the Site's allocation for high density and high growth potential. The proposed massing strategy follows a 'layered approach to scale', which steps up from its more sensitive edges (referred to as 'Transition' areas), before stepping up through areas on less sensitive edges and into the Site ('Extend' areas) and towards the centre of the Site that is furthest from sensitive neighbour and heritage interfaces ('Reinvent' area) to form a central tall building cluster to the east and west of the central Table Park and centred around a single landmark building next to the Empress State, along with a spine of taller buildings that heads north to the Site boundary with the A4 and the tall buildings within the 100 West Cromwell Road and Warwick Road Masterplan sites along the WLL to the north of the Site. The central tall building cluster centres around a single landmark building.
- 7.270. The tallest buildings proposed in RBKC and LBHF form part of the Detailed Components. There are no prescribed building height thresholds set in the London Plan or LBHF Local Plan. Draft RBKC Local Plan Policy SA2 identifies a range of 'appropriate' heights for the RBKC Hybrid Application Site of up to 72m AOD. The inclusion of the word 'appropriate' indicates that the parameters could be exceeded, subject to testing and assessment through the planning application process.
- 7.271. ECDC, on behalf of the Applicant, has submitted representations throughout the Local Plan process which argue that the 'appropriate' building heights on the Site should not be prescribed through the Local Plan, but should be agreed through the planning application and masterplanning process. This has been reflected in the Local Plan Inspector's Main Modifications published in July 2024. This is because such processes include a site-specific, thorough and robust design and townscape assessment (see ES Volume 2) such as has been undertaken by the Applicant's design team in preparing the Proposed Development and has been included in the information submitted as part of the Hybrid Applications.
- 7.272. The Inspector's Report on the Examination of NLPR, 5 July 2024 commented (paragraph 105) that *'In such a complex wider site, which lies in two boroughs and is likely to be developed over several years and in phases, it is important that there is flexibility within the site allocation which lies within the Borough. The use of appropriate heights allows this, whilst at the same time setting out broad parameters to be consistent with the LP. Paragraph 10.10 of the supporting text makes it clear that exact locations and heights will be the subject of detailed master planning. In this context, a pragmatic flexible approach to ensuring the delivery of a well-designed development within the Borough is required. Therefore, in the interests of effectiveness MM283, MM292, MM296 are necessary to make explicit that any development must take into account the wider site which falls within the LBHF, as well as the wider townscape context outside of the Borough'*.
- 7.273. The Inspector's Main Modification 283 would read *'Precise locations and heights for tall buildings will be the subject of a full and proper testing process through detailed masterplanning work taking into account those parts of the site within the London Borough of Hammersmith and Fulham, and an assessment of impact in line with Policy D9 (C and*

D) of the London Plan, site constraints and other factors such as legibility, sunlight and daylight’.

- 7.274. The Proposed Development has been the subject of a full and proper testing process through the design-led approach that is set out in the sections above and below and within the submitted DASs and ES Volume 2. This has established the appropriate approach to building heights in each part of the Site in accordance with relevant London Plan Policies, including D9. Increased scale at the subject Site also has the potential to deliver a greater quantum of Development, which in turn has the potential to deliver increased levels of public benefits, potentially securing an increased level of much needed housing.
- 7.275. The design quality of the Detailed Component, which is described in the Design section above, will act as a benchmark for the tall buildings in the Outline Component that will come forward for detailed design under applications for RMA in future and demonstrates a strong commitment from the Applicant in securing good design. While there are tall buildings proposed in outline, the parameter of each tall building has been carefully considered and controlled by the Parameter Plans. The Design Code sets out specific requirements for scale and mass of buildings, including rules to ensure the design of the taller buildings will be of an exemplary design standard, setting out the key design principles but without being overly prescriptive to enable exemplary architecture to come forward in the future.
- 7.276. The arrangement of maximum massing envelopes for the Outline Components, which are controlled by the submitted Maximum Heights Parameter Plan, has also had regard to effects on microclimate considerations (such as daylight, sunlight and overshadowing, and wind) for Site neighbours and future occupants of the Site.
- 7.277. The maximum building heights of the Outline Component are defined by the Parameter Plans and set out in the Development Specification, which identify a 106.4m maximum height limit (Plot WB06). The maximum heights of the Detailed Component buildings have been informed by the masterplan strategies and have subsequently been defined by the detailed testing undertaken by the plot architects in line with the design-led approach. The maximum heights are:

Plot	Height (m) AOD
WB03	112.4
WB04	158
WB05	62.2
EC05	109
EC06	80.1

- 7.278. The proposed approach to building heights, scale and massing, which is supported in principle by GLA, RBKC and LBHF officers through pre-application feedback and GLA LRP,

RBKC QRP and LBHF DRP responses, has been the subject of an extensive and considered design-led process to ensure an appropriate balance is struck between retaining good quality amenity and optimising the use of the Site through the careful positioning of buildings that will be designed to an exemplary standard, in accordance with London Plan Policies D2, D3 and D4, RBKC Local Plan Policy CL12, draft RBKC Local Plan Policies CD1 and CD2 and LBHF Local Plan Policies DC1 and DC2.

Tall Building Statement

- 7.279. London Plan Policy D9 requires Boroughs to determine suitable locations where tall buildings may be an appropriate form of development (the 'plan-led approach') and sets out criteria against which proposals for tall buildings should be assessed.
- 7.280. Policy D9 (Part A) also requires boroughs to define what is considered a tall building for specific localities within their Local Plans, the height of which will vary depending on context, but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Policy D9 (Part B) then requires boroughs to determine locations where tall buildings may be appropriate.
- 7.281. A tall building is defined in the draft RBKC Local Plan as being over 30m. Draft RBKC site allocation Policy SA2 identifies the Site as an appropriate location for tall buildings. LBHF Local Plan Policy DC3, which pre-dates London Plan Policy D9, states that tall buildings are those "*significantly higher than the general prevailing height of the surrounding townscape*" and also identifies the ECWKOAs as an appropriate location for tall buildings, subject to detailed design and analysis, which is provided in the LBHF Hybrid Application.
- 7.282. The London Plan ECWKOAs and Local Plan site allocations (adopted and draft) for the Site require a significant number of homes and jobs to be delivered on it, among other uses and significant areas of public realm and open space. To achieve these requirements and optimise the use of the Site, it is acknowledged that tall buildings are expected to come forward on the Site.
- 7.283. LBHF Local Plan Policy FRA Fulham Regeneration Area sets out (in supporting paragraph 5.82) that "*there will be opportunities for higher density development in the Opportunity Area, including the potential for tall building, subject to detailed design and analysis*".
- 7.284. Draft RBKC Local Plan Policy CD7 (Tall Buildings) states that proposals that meet or exceed the definition of a tall building will be assessed in accordance with London Plan Policy D9.
- 7.285. Tall buildings within both the Outline and Detailed Components of the Proposed Development have been designed in line with the qualitative criteria of Policy D9 (Parts C and D) and LBHF Policy DC3, as demonstrated by the Compliance Tables set out at Appendix 2. This assesses the proposed tall buildings in relation to visual, functional and environmental impacts. A summary of the acceptability of the proposed tall buildings is provided below.

Outline Component

- 7.286. The approach to tall buildings for the Outline Component is in line with the plan-led approach as required by London Plan Policy D3 and the LPG. The distribution of massing responds positively to the conditions around the site, with generally taller plots towards the centre and lower towards the edges. Isolated points of greater height are proposed in key locations, acting as markers within the Site. These have been carefully placed to assist with wayfinding across the Site and to ensure acceptable visual impacts on key townscape views and heritage assets.
- 7.287. The submitted Maximum Height Parameter Plan, Design Code and DAS Volume 1: Outline Component demonstrate that the considered design approach follows the intent set out in the draft RBKC Policies CD7 and SA2 and LBHF Policies CD3 and FRA1. Building heights are generally consistent with draft RBKC Local Plan Policy SA2 guidance heights. Where the maximum height of a selection of Plots (B2, K and F) exceed these guidance heights, this is part of a thoroughly considered and tested approach taking account of the multiple factors discussed in this section, the DAS Volume 1: Outline Component and townscape and heritage assessments. Within the LBHF Site, tall buildings are generally located away from sensitive neighbouring properties towards the centre of the Site or on the northern and southern Site boundaries where the local townscape is more varied and fragmented, and where nearby properties are set back on the opposite side of adjacent roads.
- 7.288. Full testing of the tall buildings within the Outline Components will come forward on the basis of detailed design, form, scale, materiality and colour at the RMA stage. However, the submitted Design Code and illustrative material presented in the DAS Volume 1: Outline Component Masterplan demonstrate the way in which massing may be broken down within maximum parameter envelopes and provide sufficient examples of the way in which Plots within the Outline Components may be designed to confirm that the Proposed Development will deliver very high quality buildings that will make attractive contributions to the local skyline when read individually or as part of a group of tall buildings.
- 7.289. The Proposed Development will create a layered townscape in views, managing the increase in scale, and would achieve a good balance of familial character, local distinctiveness and architectural coherence, and enough visual variety to minimise any potential visual coalescence between the individual plots. Through these measures, adverse effects on visual amenity have been iteratively reduced and minimised.
- 7.290. It is acknowledged there would be some change in townscape views due to the contrast in scale and form of the Proposed Development when seen in close proximity to parts of the low scale fine grain townscape of its surrounding context, particularly where this existing townscape is designated townscape of high sensitivity, with limited views of taller modern built form in the existing condition. Notwithstanding, the Proposed Development has been designed over a long process of iterative testing and design development to optimise the capacity of the Site while eliminating, reducing or minimising adverse effects on townscape character and visual amenity wherever possible.
- 7.291. The DAS Volume 1: Outline Component sets out how the Applicant Team adopted the design-led approach to establish a robust height strategy and positively respond to the

design criteria contained within London Plan D3, D9, RBKC Local Plan Policy CF1, draft RBKC Local Plan Policies CD2, CD7 and SA2 and LBHF Local Plan DC3, as well as the Priorities of the Earls Court Placemaking Framework SPD.

LBHF Detailed Component

- 7.292. Tall buildings in WB03, WB04 and WB05 have been designed in line with London Plan Policies D3 and D9 and LBHF Local Plan DC3, FRA and FRA1. They are well-proportioned buildings, located sufficiently far apart such that they typically appear at considerably different heights in views towards the site. Their different forms, alignments and appearances compared to each other would also ensure that they would be readily distinguishable and viewed together would form a visually interesting and elegant composition.
- 7.293. WB03 and WB04 would be located close to the existing 31-storey Empress State Building, to the west and north of the new Table Park, at the crossing of new east-west and north-south routes, marking this as a new destination and crossing point between LBHF and RBKC. This WB04 would form the single taller focal point at 42 storeys and would have a distinctive stepped crown that would form the peak of the cluster seen from all directions.
- 7.294. The lower datum of taller buildings, including WB05 T1 and T2, Outline Component Plot WB02 and WB06 and EC05 and EC06 of the RBKC Detailed Component would provide a transition of built form up to the cluster and WB04.
- 7.295. The LBHF Detailed Component buildings would visibly signal the transformation of the long-vacant brownfield site of the former exhibition centres and mark the new east-west and north-south routes through the Proposed Development, the new Table Park and destination cultural uses within the Proposed Development.
- 7.296. WB05 would step down in scale towards the edges of the Site to manage the change in scale from the tall building cluster to the existing smaller scale townscape context around the Site.
- 7.297. The DAS Volume 3: RBHF Detailed Component sets out how the Applicant Team adopted the design-led approach to establish a robust height strategy and positively respond to the design criteria contained within London Plan D3, D9 and LBHF Local Plan DC3, FRA and FRA1.

RBKC Detailed Component

- 7.298. In accordance with RBKC Local Plan Policy CL12, the proposals for EC05 and EC06, the tallest building in RBKC within the Proposed Development, are brought forward in detail, which recognises the importance of design quality in delivering built form of the scale proposed.
- 7.299. While the height of buildings in Plots EC05 and EC06 exceed the building heights identified in draft RBKC Local Plan Policy SA2 guidance heights, supporting text to Policy SA2 allows

for the appropriateness of taller buildings to be considered acceptable through the full and proper assessment and testing and design-led process referred to above.

7.300. The DAS Volume 2: RBKC Detailed Component (Plot EC05 and EC06) sets out how the Applicant team followed the design-led approach and built upon the masterplan strategic framework principles to positively respond to the design criteria contained within London Plan Policies D3, D4 and D9, Local Plan Policy CF1, CL12, draft Local Plan policies CD2, CD7 and SA2, as well as the Priorities of the Earls Court Placemaking Framework SPD. While the height of buildings in EC05 and EC06 are taller than those identified in Policy SA2, this is considered acceptable when taking account of the following:

- EC05 and EC06 follow the design layered approach to scale, with massing stepping down to more sensitive edges. EC05 steps down to the east to create a mansion-block-scale along Warwick Crescent, acknowledging the residential character of this street and the sensitive Philbeach Gardens edge
- EC05 and EC06 are positioned away from the Site boundaries and the tallest elements of built form are positioned towards the centre of the Site forming part of a cluster of forms (with the Outline Component Plot WB06) which frames The Table, the largest adding to the strategic framework's layered approach to scale
- The proposed scale and mass has been developed in conjunction with parameters for adjacent Development Plots, ensuring that EC05 and EC06 would sit comfortably with later RMAs, as demonstrated within the Illustrative Masterplan
- EC05 and EC06 are positioned close to the axis of two key routes within the Site and they mark the Table Park and this strategic location, helping with legibility and way-finding
- Scale and position of mass has been informed by daylight and sunlight impacts on neighbouring properties (this resulted in EC05 and EC06 'swapping' the position of the tallest element and later EC06 being reduced by a further storey), microclimate testing and ensuring a good standard of accommodation is delivered for future residents, including internal daylight levels and overheating requirements
- EC05 and EC06 would respect the existing wider character of the area and would use high quality materials that are fitting for their context and meet required safety standards
- Best practice design principles have informed the approach to form and articulation, including delivering slender proportions, having a defined base, middle and top to both buildings and delivering a skyline contribution through distinct and elegant tops while taking account of heritage, townscape and microclimate considerations
- In accordance with emerging RBKC Local Plan Policy CD7 Part F, EC05 and EC06, deliver accommodation of the highest quality (See Housing Quality section of this Planning Statement)

Summary

- 7.301. Tall buildings form a fundamental component of the Proposed Development and play a key role in optimising the potential of the Site. They contribute to placemaking and legibility while making the best use of land and ensuring the Proposed Development will provide the homes, jobs and open spaces the Site is required by planning policy to deliver. The principle of their inclusion in the development of this Site are supported and justified by planning policy.
- 7.302. The high-density, high-quality proposals respond appropriately to the Site's accessibility and townscape and heritage context, acting as a catalyst for change. The intensification of the Site responds proactively to local, regional and strategic priorities for good growth in sustainable locations, and appropriately targets high-density and large-scale development on this strategically important development Site.
- 7.303. The Proposed Development is transformative and will deliver significant qualitative and quantitative benefits, which are set out in detail in Chapter 9 of this Statement.
- 7.304. In respect of the Outline Component, the Parameter Plans and Design Code will ensure that any future RMA proposals would be of high quality in terms of its architectural design and have coherence throughout its massing and scale.
- 7.305. In respect of the Detailed Component, as evidenced by the DAS Volume 2: RBKC Detailed Component and DAS Volume 3: LBHF Detailed Component and the detailed drawings for approval, the proposed tall buildings would be of a high quality in terms of their architectural design and appearance and would comply with the qualitative criteria of London Plan Policy D9 and LBHF and RBKC Local Plan design policies.
- 7.306. Having regard to the above and appended information, the Site is appropriate for tall buildings and their inclusion in the considered height and massing strategy for the Proposed Development will result in a significant package of planning benefits for the local and wider area. The Proposed Development complies with London Plan Policy D3, D9 and LBHF Policy DC3, FRA, FRA1 and RBKC Local Plan Policy CL2, CL11 and CL12 and NLPR Policy CD7 and SA2 and should therefore be considered acceptable in this regard.

Residential Amenity

- 7.307. In line with the requirements of London Plan Policy GG2 and making the best use of land, the Earls Court Development by following the design-led approach, including capacity and environmental testing, ensures the Site optimises its potential for housing delivery. This means making the best use of sites to deliver more homes without compromising on quality.
- 7.308. London Plan Policy D6 sets out that qualitative aspects of a development are key to ensuring successful sustainable housing.
- 7.309. The GLA Housing Design Standards LPG was adopted in 2023. It includes a set of standards for new residential development including minimum and best practice space

standards, a target that all residential accommodation is dual aspect (except in exceptional circumstances), further requirements on amenity space, residential quality, cycle and car parking.

- 7.310. In respect of the Outline Component, the submitted Parameter Plans and Design Code define 'rules' across the wider masterplan. These rules will secure high quality residential accommodation throughout the Proposed Development and will ensure that the Outline Component achieves a high standard of accommodation. The Parameter Plans set the positions and maximum height of Plots in relation to each other and neighbouring built form. The Design Code rules include aspects such as separation distances between blocks, character of streets and the approach to layout and amenity.
- 7.311. All of these qualitative aspects of housing design are enshrined within the Design Code for the Outline Component, which will ensure that the residential accommodation will be of high quality. The RMA applications will be required to demonstrate a detailed response to the Housing Design Standards LPG.

Internal Space Standards

- 7.312. London Plan Policy D6 requires housing development to be of a high-quality design and provide adequately sized rooms for future residents, with comfortable and functional layouts that are fit for purpose and meet the needs of Londoners without differentiating between tenures. Alongside this policy, Table 3.1 sets minimum space standards for new dwellings, including levels of built-in storage.
- 7.313. LBHF (H04) and RBKC (CH3 and draft H04) Local Plans use the nationally described minimum space standards as adopted in the London Plan as a benchmark for the size of homes. NLPR Policy HO1 states that the Council will resist very large homes by benchmarking floorspace against nationally described housing standards. The provision of super prime large homes has an impact on the ability of the Borough to meet its housing supply targets.
- 7.314. In line with the Design Code, the proposed Outline Component residential units will comply with or exceed minimum internal standards. The proposed Detailed Component residential units are well designed and fully comply or exceed the minimum internal space standards as set out in the London Plan, thereby providing sufficient and high-quality internal space for future occupants.
- 7.315. The GLA's Housing Standards LPG was adopted in 2023. The guidance brings together, and helps to interpret, the housing-related design guidance and policies set out in the London Plan Policy D6. It provides a set of standards both mandatory and best practice that relate to housing design. It applies to the creation of new housing that fall within Planning Use Class C3.
- 7.316. As set out in the DAS Volume 2 and 3 the RBKC and LBHF Detailed Components perform well against LPG standards and provide a high-quality standard of accommodation, including meeting the following standards:

- Minimum areas
- Accessible unit requirements
- Minimum ceiling heights of 2.5m
- Combined kitchen/dinning space standards
- Location of main living room and eating spaces optimised to make the most of the best views and orientation and direct sunlight
- All habitable rooms receive natural light

Dual Aspect

- 7.317. London Plan Policy D6 states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution in relation to optimising site capacity than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 7.318. The Housing Design Standards LPG provides a definition and worked examples of 'dual aspect' accommodation and includes a target that all residential accommodation is dual aspect (except in exceptional circumstances).
- 7.319. 'Habitable dual aspect' is the Earls Court Development definition of dual aspect used in this application in conjunction with the GLA's Housing Design Standard definition which requires the return wall of a dual aspect apartment to be half the depth of the apartment. Habitable dual aspect meets this definition when non-habitable rooms are discounted from the measurement.
- 7.320. The principle of applying the alternative definition of 'dual aspect' has been received favourably as part of pre-application discussion with the boroughs, the GLA and as part of DRP, QRP and LRP reviews.
- 7.321. In terms of the Outline Components, the number of dual aspect units within the development will be maximised to ensure a high level of amenity for all future residents, as required by the 'rules' of the Design Code. No single aspect north facing units would be brought forward due to the difficulties for these units being able achieve suitable levels of natural daylight and sunlight internally.
- 7.322. The RBKC and LBHF Detailed Component has been designed to maximise the number of dual aspect units, which are set out in Tables 27 and 28 below:

Unit Aspect Type	EC05	EC06
Single aspect	13%	0%
Dual Aspect	87%	100%
LPG Duals Aspect	51%	78%

Habitable Dual Aspect Definition	36%	22%
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Table 28: Percentage of dual aspect homes in the LBHF Detailed Component		
Unit Aspect Type	WB04	WB05
Single aspect	0%	0%
Dual Aspect	100%	100%
LPG Duals Aspect	45%	67%
Habitable Dual Aspect Definition	55%	100%

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

Private Amenity Space

7.324. London Plan Policy D6 requires a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings with an extra 1 sqm for each additional occupant and notes that private amenity space must achieve a minimum depth of 1.5 metre.

7.325. LBHF Local Plan H04 requires all housing development to provide a high-quality residential environment, be well designed internally and externally and RBKC Local Plan Policy CH3 requires new residential developments to be designed to meet the housing standards on space and access as set out in the London Plan.

7.326. The expectation is that all new homes within the Outline Component will have their own balcony, terrace or internalised amenity which will be designed to meet or exceed the minimum requirements as set out in the London Plan. This is secured through the submitted Design Code. The Proposed development will comply with the relevant private amenity space requirements and will provide a high standard of accommodation for future residents, in line with Policy D6.

7.327. All homes within EC06 and the majority of homes within EC05 are provided with private amenity in the form of a balcony or terrace providing the required sqm area and LPG design criteria. A small number of homes (8) at the lower levels of EC05 utilise internalised amenity in lieu of a projecting balcony where the latter would contribute to potential overlooking or conflict with the architectural character of the building. These homes are larger to provide the equivalent additional sqm in line with Policy D6.

7.328. The Proposed Development will comply with the relevant private amenity space requirements and will provide a high standard of accommodation for future residents, in line with Policy D6 and the LPG.

- 7.329. The majority of units within WB04 benefit from private amenity in the form of balconies, although owing to the height of the building, different faces and corners of the building have differing micro-climatic conditions which mean external amenity is not suitable in all locations. The design maximises the extent of external private amenity space and wherever a comfortable external amenity space could not be achieved, these spaces have been internalised (89 homes) and equivalent sqm area provided internally. The principle of this approach has been discussed and agreed with LBHF planning and design officers during pre-application discussions.
- 7.330. All units within WB05, T1 and T2 have private amenity space in the form of balconies or terraces which comply with required areas and layout.
- 7.331. The Proposed Development will comply with the relevant private amenity space requirements and will provide a high standard of accommodation for future residents, in line with Policy D6 and the LPG.

Communal Amenity

- 7.332. London Plan Policy D6 sets out a number of qualitative aspects of a development that are key to ensuring successful sustainable housing. One qualitative aspect is the provision of sufficient communal outside amenity space to meet the requirements of the number of residents, which is easily accessible from all related dwellings and is designed to support an appropriate balance of informal social activity and play opportunities for various age groups.
- 7.333. The RBKC Local Plan does not set quantitative requirements for communal amenity space. Local Plan Policy CH3 requires housing schemes to include outdoor amenity space. As part of the Proposed Development, communal amenity space dedicated to future residents is proposed, through podium courtyards and accessible rooftops, across all plots.
- 7.334. LBHF Planning Guidance SPG Key Principle HS1 states that all new dwellings should have access to an area of amenity space, appropriate to the type of housing being provided. New family (3 or more bedrooms) dwellings should have access to amenity space of not less than 36 square metres. Family dwellings (3 or more bedrooms) with accommodation at garden level should have at least one area of private open space with direct access to it from the dwelling. For family dwellings on upper floors this space may be provided either as a balcony or terrace and/or communally within the building's curtilage. Where communal open space is provided, development proposals should demonstrate that the space: has a well-designed area for children's play adequate to meet the needs of the development; is overlooked by surrounding development; is accessible to wheelchair users and other disabled people; is designed to take advantage of direct sunlight; has suitable long term management arrangements in place to ensure open space is well managed over the life of the development.
- 7.335. The Design Code will inform the approach to communal amenity for the Outline Component Plots which will be subject to future RMA, this includes setting out the approach to podiums, roof terraces and courtyards. It requires that communal spaces should minimise

compartmentalisation and be accessible and usable to residents, as well as requiring soft landscaping and doorstep play.

- 7.336. Communal amenity is provided for EC05 in lower floors of the building and within roof terraces and courtyards. Communal amenity opportunities for EC05 and EC06 are also provided within the wider proposed public realm, including the adjacent Warwick Walk and more intimate spaces at the termination of Warwick Crescent.
- 7.337. WB04 residents have access to a number of external amenity spaces at podium level and communal amenity terraces are also provided at the upper floors of the building. Internal communal amenity areas are also provided (including the rooftop 'Conservatory').
- 7.338. WB05 residents have access to communal outdoor amenity within the courtyard.
- 7.339. Communal amenity opportunities for both WB04 and WB05 are provided within the wider proposed public realm (Outline Component), including Aisgill Gardens directly adjacent to the plots.
- 7.340. The Outline and Detailed Components of the Proposed Development would deliver a high standard of accommodation in line with London Plan Policy D6, the Housing Standards LPG, the LBHF Local Plan Policy H04 and RBKC Local Plan Policy CL5 (NLPR Policy CD8).

Playspace

- 7.341. London Plan Policy S4 sets out the requirements for play provision to be included in Developments that are likely to be used by children and young people. For residential developments, good-quality, accessible play provision for all ages should be incorporated. At least 10 square metres of playspace should be provided per child.
- 7.342. RBKC Local Plan Policy CR5 requires major developments that include residential floorspace to provide on-site external play space in accordance with London Plan Policy S4, including for under-fives. This is repeated within Draft Local Plan Policy GB15. LBHF Local Plan Policy H04 requires playspace as part of new development.
- 7.343. As set out in the DAS Volume 1: Outline Component and Design Code, the proposed play strategy intends to meet the play needs of all children and young people expected to occupy the development on-Site. The Proposed Development will create a welcoming, inclusive and supportive place for resident children and young people, as well as those in the local area. It will be somewhere where children and young people can enjoy and feel safe playing together.
- 7.344. It will do this by providing high quality playable spaces, dedicated play spaces and safe routes between them, and embracing the principles of the Good Growth by Design report-Making London Child Friendly as follows:
- Enabling children to access play spaces safely and independently
 - Distributing play throughout the open spaces including risky play and exploration

- Forming an integral part of the surrounding neighbourhood and encouraging children and young people to enter Earls Court'
- Play will not be segregated by housing tenure and will be provided for all age groups and needs
- The spaces will be overlooked and will incorporate trees and/or other forms of greenery

7.345. The play strategy has also been designed through engagement with PRIP. The Design Code outlines the proposed provision of Playspace across the development.

7.346. As set out in the DAS Volume 1: Outline Component Masterplan, a number of scenarios have been tested to ensure that playspace requirements will be met as part of RMA, including based upon a maximum development scenario. It is noted that the Outline Component also includes extending the existing compromised MUGA on Aisgill Avenue, which will provide play for older children.

7.347. The Design Code requires dedicated play areas to be located in the public realm and that they should be accessible, welcoming and open. It provides guidance on:

- Natural surveillance
- Carer Provision
- Clear sight lines
- Materiality

7.348. Whilst the site-wide strategy focusses on play within the public realm, both the RBKC and LBHF Detailed Plots provide an element of doorstep play for 0-4 year olds.

7.349. As part of the RBKC Detailed Component an area of 160sqm of play is provided within Warwick Walk. Whilst this is publicly accessible, the landscape has been designed to give residents of EC06 ownership of this space. A further 50sqm of play is provided within the EC05 courtyards. The remainder of the play requirement generated by EC05 and EC06 is provided within The Table, adjacent to the Plot.

7.350. As part of the LBHF Detailed Component, an area of 618sqm of doorstep play is provided within the WB04 podium and WB05 courtyard. The remainder of the play requirement generated by WB04 and WB05 is provided within Aisgill Gardens adjacent to the plot.

7.351. The Proposed Development would meet the requirements of London Plan Policy S4, RBKC Local Plan Policy CR5, draft Local Plan Policy GB15 and LBHF Local Plan Policy H04.

Accessible and Adaptable Homes

7.352. Inclusive design principles are embedded within the Control Documents and further detail will be provided through the RMA process once detailed designs for the new homes come forward.

7.353. Homes within the Proposed Development would at a minimum meet Part M4(2) standards and 10% of all new homes would be designed as wheelchair homes and meet Part M4(3) standards. This is demonstrated as part of the RBKC and LBHF Detailed Components which would provide at least 10% of the new homes as M4(3) Category 3: Wheelchair user dwellings standard, while the remainder will meet the M4(2) Category 2: Accessible and adaptable dwellings standard. The Purpose Built Student Accommodation (PBSA) proposed as part of Development Plot WB03 would deliver 10% of the units as wheelchair units. Blue badge car parking spaces will also be provided.

7.354. Overall, the Proposed Development would deliver a high quality, accessible, inclusive and sustainable place in accordance with the relevant planning policies and inclusive design principles.

Heritage and Townscape

Relevant Policy Context

7.355. The following planning policies and guidance are of most relevance to this sub-section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 16: Conservation and enhancement of the Historic Environment: Applicants should describe the heritage assets affected and the impact on the significance of designated heritage assets should be given to the asset's conservation. - Paragraphs 203, 205 and 208: identifies the manner in which development impacting on a designated heritage asset should be assessed including the weighing of public benefits against them.
London Plan	<ul style="list-style-type: none"> - Policy HC1: Heritage conservation and Growth - Policy D3: Optimising site capacity through the design led approach - Policy D9: Tall Buildings
London Plan Supplementary Planning Documents	<ul style="list-style-type: none"> - Policy A1.3: Response to context and the climate emergency of the Housing Design Standards
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CO5: Strategic Objective for Renewing the Legacy - Policy CR3(e): Streets and Outdoor Life - Policy CL3: Heritage Assets – Conservation Area and Historic Spaces - Policy CL4: Heritage Assets – Listed Buildings, Scheduled Monuments and Archaeology - Policy CL11(c): Views

RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy CD3: Heritage Assets – Conservation Areas - Policy CD4(a): Heritage Assets - Listed Buildings - Policy CD6: Registered Parks and Gardens - PLV2(c): Earl’s Court Opportunity Area - Policy SA2(o): Earl’s court exhibition Centre
RBKC Supplementary Planning Documents	<ul style="list-style-type: none"> - Priority 1 (Public Realm First), section 1.1 (b): Landscape before buildings of the Earl’s Court Opportunity Area Placemaking Framework
LBHF Local Plan	<ul style="list-style-type: none"> - Policy DC1: Built Environment - Policy DC3: Tall Buildings - Policy DC7: Views and Landmarks - Policy DC8: Heritage and Conservation

Assessment

- 7.356. The submitted ES Volume II (which includes the Heritage ES Chapter and Townscape and Visual Assessment (“TVA”) and the Heritage Impact Assessment (“HIA”) appended to the ES) provide an assessment of the effect of the Proposed Development on the surrounding historic environment and townscape character and views. The assessments provide a detailed consideration of the townscape and historic context to the Site, which has informed the understanding of the local area, the design evolution of the Proposed Development and the assessment of long term significant heritage and townscape effects.
- 7.357. Throughout the pre-application process, the layout and massing of the Outline and Detailed Components has been refined and adjusted having regard to stakeholder feedback as well as multiple planning considerations, including a focus on heritage and townscape and the requirements of planning policy to minimise impacts on designated heritage assets.
- 7.358. The potential for the Proposed Development to result in less than substantial harm (“LTSH”) to nearby listed heritage assets has been identified by officers during pre-application discussions, subject to further consideration of the design of the Proposed Development following submission of the Hybrid Applications. The design evolution process has been through multiple iterations to mitigate the perception of harm. This has included the reduction and re-configuration of buildings to reduce impacts on views of the Site from Brompton Cemetery and in the backdrop to views of the Church of St Cuthbert’s and Matthias in RBKC and removal of a tall building from the LBHF Detailed Component to reduce the coalescence of buildings in townscape views affecting the setting of designated heritage assets, including Conservation Areas in RBKC and LBHF. Changes made during the pre-application process in response to consultation feedback have reduced floorspace by approximately 10% and reduced the visual impact of massing. The submitted DASs (Volume 1: Outline Component, Volume 2: RBKC Detailed Component and Volume 3: LBHF Detailed Component), HIA and ES Volume II describe this design evolution process in more detail.

7.359. The process of design evolution is referred to as embedded mitigation, which has informed an internal heritage balance undertaken in the assessment of impacts in the Heritage ES Chapter and HIA and is taken into account in the TVA when assessing effects. The process has also ensured that a coherent massing and townscape strategy, which is based on a detailed understanding of the Site, its historic local context and the varied character of the surrounding area, has been applied to the Proposed Development. Its response to constraints such as the setting of nearby Conservation Areas and listed heritage assets strikes an appropriate balance between minimising adverse impacts and optimising the capacity of the Site, in accordance with the strategic direction of planning policy.

Heritage

7.360. NPPF para. 203 requires LPAs to take account of the desirability of new development making a positive contribution to local character and distinctiveness. Para. 205 states that great weight should be given to a designated heritage asset's conservation, while para. 208 states that where a development will lead to LTSH, this harm should be weighed against the public benefits of the proposal.

7.361. London Plan and Local Plan policies reflect the NPPF's direction to seek to conserve the significance of designated heritage assets by directing development to be sympathetic to the assets' significance and appreciative of their surroundings, while balancing the impact of development on setting and any harm identified against the benefits of the proposed development.

7.362. The Heritage ES Chapter and HIA note that the only heritage assets located on the Site are:

- Part of the Philbeach Conservation Area in the south eastern corner of the Site next to Old Brompton Road (which is an area of vacant land already cleared awaiting redevelopment)
- Part of the Baron's Court Conservation Area in the north western corner of the Site next to West Kensington Station (which comprises a row of two storey properties of little heritage value that are identified for potential demolition)
- A single storey emergency exit structure next to Warwick Road, which is a modern addition to the Grade II listed Earls Court station Exit 3 that lies below, but not within, the RBKC Hybrid Application Site. No works are proposed to this structure as part of the Proposed Development

7.363. All other designated heritage assets considered by the assessments, which have been formally scoped through the EIA Scoping process with both LPAs, are off-site and therefore the assessments only consider impacts on the setting of identified heritage assets.

7.364. The HIA and Heritage ES Chapter consider each heritage asset in turn in relation to the impact of the Proposed Development on the whole of the heritage asset. The pre-application process and embedded mitigation, which has included consideration of the scale, location, massing and articulation of proposed buildings within the Proposed Development and their relationship with the setting of nearby heritage assets. This has ensured that out of 93 heritage assets assessed, no harm or neutral are identified for 55 assets, the significance

of which would be preserved. Very low, low or low/medium levels of less than substantial harm (“LTSH”) or adverse effects are identified for the remaining 17 assessed heritage assets (12 in RBKC and 5 in LBHF), with harm to 19 non-designated heritage assets (all in LBHF).

- 7.365. Significant effects are identified in relation to the demolition of the TfL Train Maintenance Shed and 9 Beaumont Avenue as non-designated heritage assets. Both buildings are, however, identified as being of very low heritage value in the submitted assessments. The Train Maintenance Shed is identified for potential retention and re-purposing as part of the development of Development Plot WK08, which would reduce this effect, while 9 Beaumont Avenue is proposed to be redeveloped to deliver new homes or PBSA development, which would mitigate the removal of the non-designated heritage asset.
- 7.366. Heritage benefits are identified in relation to the listed Earls Court and West Brompton Stations as a result of the Proposed Development reinforcing their importance as transport hubs. It also identifies the potential for heritage benefits to Brompton Cemetery if appropriately worded S106 obligations can be agreed that contribute towards the repair, restoration, maintenance and/or management of the Cemetery. EDCD, on behalf of the Applicant, would welcome further discussions with the Royal Parks on this matter during the Hybrid Applications determination period.
- 7.367. The HIA concludes that, while there would be harmful effects on designated and non-designated heritage assets, the Proposed Development would repair this part of West London with a new destination, providing activity, open space and high quality design to the area. The design of the Proposed Development has considered the heritage sensitivities around the Site from the outset and harm has been minimised as far as possible in consultation with stakeholders during pre-application engagement. That process will continue through the RMA process.

Townscape

- 7.368. The TVA assesses the impact of the Proposed Development on the surrounding townscape character and quality (the “Townscape Assessment”) and in terms of visual impacts (the “Visual Assessment”). It assesses verified view images that are based on visualisation of the Detailed Components alongside maximum parameter envelope depictions for the Outline Components, which are drawn applying the controls set by the Parameter Plans and Design Code. The Townscape and Visual Assessments consider the effect of the Proposed Development from 59 verified viewpoints, which have been agreed with both local authorities through the EIA Scoping process, with input from GLA and Historic England officers provided during pre-application discussions. The views contained within the TVA have also informed the assessment and conclusions of the HIA and ES Heritage Chapter as part of the assessment of impacts on the whole of each heritage asset. The Proposed Development is not visible in any London View Management Framework (“LVMF”) views.
- 7.369. The TVA considers the effect of the Proposed Development on the selected views having regard to the level and proximity of built form that is visible and how it affects the existing townscape, and in many views the setting of designated heritage assets, applicable to the

view, taking account of design development that has refined the arrangement of massing, considered the relationship between proposed buildings and the surrounding area and how architecture of buildings in the Detailed Components help to reduce effects in views by articulating the quality of the proposed buildings.

- 7.370. Maximum parameter envelopes are required to be shown in views for the Outline Components, but they are not representative of the built form of the Outline Components that will be delivered in future. To contextualise the effect of the Proposed Development in a more representative way, a set of 33 illustrative views is appended to the TVA which apply indicative façade treatments to buildings in Outline Component Development Zones (the approach to which are described in the DAS Volume 1: Outline Component) to provide an indication of the quality of buildings that could come forward in line with the parameters and design rules set out on Parameter Plans and in the Design Code.
- 7.371. The pre-application process and embedded mitigation ensure that the Townscape Assessment finds (for Early and All Phases) beneficial or neutral (not significant) effects on Townscape Character Areas (“TCAs”) in 51 of the 59 assessed views. Significant effects (moderate or above) in terms of scale are found in the remaining views. In the Visual Assessment significant effects are identified in 35 views in the Early Phases and 42 views in the All Phases scenario, although effects in 9 of these views revert to minor effects in spring, summer and autumn due to the significant reduction in visibility of the Proposed Development in the views when trees are in leaf.
- 7.372. The majority of the buildings that appear in views are proposed in outline (other than within Development Plots EC05 and EC06 in RBKC and WB03, WB04 and WB05 in LBHF which are proposed in detail). The parameters of each Development Zone in the Outline Components have been carefully shaped and are controlled by the Parameter Plans. The Design Code sets out the key design principles for new buildings, including a contextual approach that is encouraged to be taken to materiality to offer continuity in relation to the surrounding townscape, but without being overly prescriptive to allow scope for architectural interpretation and expression. The Detailed Components include two clusters of tall buildings that have been designed to the highest quality, providing attractive wayfinding and landmark additions to the skyline in the area. The design approach for the Detailed Component buildings has been endorsed by RBKC, LBHF and GLA officers and their authority’s respective design review panels. The buildings will act as a benchmark in design quality and demonstrate a strong commitment to securing good design as the Outline Components come forward at RMA stage.
- 7.373. The public benefits associated with the Proposed Development are described in Chapter 9 of this Statement and are not repeated in full here, other than to confirm that the Proposed Development will deliver a substantial package of public benefits that will clearly and demonstrably outweigh the low level of LTSH identified to the setting of nearby heritage assets and identified townscape and visual impacts in verified views. The proposed buildings have benefited from embedded design mitigation brought about through significant pre-application engagement, massing refinement and design development. As such, the Proposed Development will result in the creation of a high quality, sustainable and attractive new place and piece of London that will deliver a range of new public open spaces,

new connectivity that will open the Site up to the public for the first time, as well as deliver a significant number of new homes and jobs to contribute towards borough and London-wide needs and deliver against the strategic objectives for the Site.

7.374. The Proposed Development, when considered overall and taking account of the planning balance set out in Chapter 9 of this Statement accords with relevant planning policy with regard to heritage and townscape considerations, in particular NPPF para. 208, London Plan Policy HC1, RBKC Local Plan Policy CL3 and CL4, draft RBKC Local Plan Policies CD3, CD4 and PLV2(c) and SA2(o) and LBHF Local Plan Policy DC8.

Fire Safety

Relevant Policy Context

7.375. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
London Plan	<ul style="list-style-type: none"> - Policy GG6(c): Increasing efficiency and resilience - Policy D5: Inclusive Design - Policy D11(c): Safety, security and resilience to emergency - Policy D12: Fire Safety - Housing Design Standards LPG <ul style="list-style-type: none"> - Section B1.4: Approach routes and entrances - B3.2: Storage of bicycles, mobility scooters and wheelchairs - B5.1 and B5.2: Fire Safety
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy CG15: Fire Safety
LBHF Supplementary Planning Documents	<ul style="list-style-type: none"> - LBHF Planning Guidance <ul style="list-style-type: none"> - Key Principle DA14: Fire Safety

7.376. This section should be read in conjunction with the Fire Strategy prepared by Hoare Lea, Earls Court Development London Plan Fire Statement Plots EC05 and EC06 prepared by Hoare Lea, and Earls Court Masterplan London Plan Fire Statement WB03, WB04 and WB05 prepared by OFR Consultants.

Assessment

Site-Wide Fire Safety

7.377. The Proposed Development has been designed to ensure second staircases are able to be provided where required.

- 7.378. Drawing number ECD-SW-ZZ-HLE-08-00-DR-O-750301 shows the location of the Fire Service access strategy, ensuring access is provided to within 18 metres of an indicative dry riser inlet/ fire service entry point to the buildings, or to within an 18 metre distance of 15-50% of the perimeter for accommodation entered directly surrounding ground level.
- 7.379. Access roads will be required to meet GN29 access route specifications to allow the Fire Service to access each of the buildings. Each building will be designed to provide internal means of Fire Service access such as firefighting or protected stairs with fire main outlets.
- 7.380. The Fire Service Access Plan details the location of the fire hydrants, which will be provided across the site.
- 7.381. The proposed development will retain and alter a section of the West London Line to create the 'table'; a new central park and 'subterranean' space beneath the park which is referred to as plot EC07. Fire service access will be made via a minimum of three cores accessed at Ground Level. Two of these cores are accessed via buildings EC04 and EC05, while further cores located within Outline plots can be incorporated into buildings above/ be freestanding in the landscape.
- 7.382. Fire safety aspects of design will be followed in the provision of Green Roofs throughout the Proposed Development.
- 7.383. The masterplan proposes an extension to the Table structure over the WLL, which will be covered with landscaping. The smoke and ventilation strategy for the resulting rail strategy includes for the provision of smoke ventilation and an access point into the tunnel via EC07. Buildings located adjacent to the open railway will contain fire-resisting construction where appropriate.
- 7.384. Enhanced smoke ventilation provisions and/or fire resistance has been provided around areas where known electric vehicle charging will take place.
- 7.385. The Fire Strategy Report is being developed as the design proposals progress to demonstrate compliance with the Building Regulations, and to ensure that the Proposed Development achieves the highest standards of fire safety. The Strategy demonstrates that the proposals have considered fire safety at the earliest stage, which will be further developed for both the masterplan and for all buildings located on the site to be submitted at the appropriate time. It does not form part of the hybrid submission.
- 7.386. The roads have been built to GN29 access route specifications to allow the Fire Service to access each of the buildings.
- 7.387. The masterplan proposes an extension to the decking structure (previously covered by the Earls Court exhibition centre) over the West London Line, which will be covered with landscaping. The smoke and ventilation strategy for the resulting rail strategy includes for the provision of smoke ventilation and an access point into the tunnel via EC07. Buildings located adjacent to the open railway will contain fire-resisting construction where appropriate.

- 7.388. Enhanced smoke ventilation provisions and/or fire resistance has been provided around areas where known electric vehicle charging will take place.

RBKC Detailed Component

- 7.389. The London Plan Fire Statement Plots EC05 and EC06 comprise of the detailed matters within the RBKC site. The cores of both EC05 and EC06 have two escape stairs, whilst all staircases within the residential buildings are built to firefighting staircase standards. To allow for escape in an upwards direction, an automatic openable vent (AOV) of 1.0m² will be provided for the residential stairs.
- 7.390. Within EC05 and EC06, two evacuation lifts (one dedicated evacuation lift and one combined evacuation and firefighting lift) will be provided to each core to facilitate the evacuation of mobility impaired occupants. Disabled refuge areas are also provided within the lift lobbies and cores with an emergency voice communication
- 7.391. The apartments within these buildings will operate on a 'stay put' evacuation strategy, whereby only residents within the apartment of fire origin would evacuate in the event of a fire (upon activation of the fire detection and alarm system). The occupants within neighbouring flats would remain in place, protected from fire by a high level of fire compartmentation unless otherwise advised by the fire service.
- 7.392. Assembly points are provided at level access for EC05 and EC06.
- 7.393. Each building contains automatic fire detection systems, sprinklers, smoke ventilation systems, emergency lighting and power supplies, structural fire resistance (the structural frame/ beam or columns would achieve 120 minutes of fire resistance) and compartmentation.
- 7.394. Access for pumping appliances will be located within 18 metres of the fire main inlet connection point on the face of buildings. The location of wet risers and any associated infrastructure will be incorporated into the fire strategy as the scheme develops. Fire hydrants will be provided within 90m of the wet riser inlet point.

LBHF Detailed Component

- 7.395. The separate London Plan Fire Statement WB03, WB04 and WB05 comprise of the detailed matters within the LBHF site. Each residential area will be served by two escape stairs; one firefighting stair and one escape stair.
- 7.396. Each residential area will be served by two escape stairs (one dedicated evacuation lift and one combined evacuation and firefighting lift) to facilitate the evacuation of mobility impaired occupants. Evacuation lift lobbies are protected through mechanical smoke control systems and compartmentation, and therefore provide protected safe spaces for mobility impaired people to wait for firefighters/ evacuation lifts to arrive.

- 7.397. Aside from the Leisure Box contained within Plot WB04 (which contains an evacuation lift), all non-residential portions of the buildings are largely accessible on level access only and therefore no lifts are provided. Emergency voice communication systems will be provided on every level both within residential and non-residential floors.
- 7.398. Each building contains a dedicated evacuation strategy, comprising of 'stay put' strategies within residential areas and 'simultaneous' strategies within ancillary residential, student accommodation and non-residential areas.
- 7.399. Assembly points to these buildings will be provided as the design progresses.
- 7.400. Each building contains automatic fire detection systems, sprinklers, smoke ventilation systems, emergency lighting and power supplies, structural fire resistance (elements of the structure achieving 120 minutes of fire resistance for load bearing capacity) and compartmentation.
- 7.401. Access for pumping appliances will be located within 18 metres of the fire main inlet connection point on the face of buildings. The location of wet risers and any associated infrastructure will be incorporated into the fire strategy as the scheme develops. Fire hydrants will be provided within 90m of the wet riser inlet point.
- 7.402. On this basis the Proposed Development is in accordance with Policy GG6, D5, D11 and D12 of the London Plan, The Housing Design Standards LPG (2023), Draft Policy CG15 of the RBKC Local Plan and Key Principle DA14 of the LBHF Planning Guidance (2018).

Sustainable Design

Relevant Policy Context

- 7.403. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Para.20(b) which requires development to make provision for waste management - Chapter 6: Building a strong and competitive economy - Chapter 8: Promoting healthy and safe communities - Para. 96 outlines guidance on how planning policy should achieve healthy, inclusive, safe places. - Chapter 14: Meeting the challenge of climate change, flooding and coastal change - Para.157 requires the planning process to support the transition to a low carbon future - Para. 159 notes that new development should be planned to help reduce greenhouse gas emissions
London Plan	<ul style="list-style-type: none"> - Policy GG1: Building strong and inclusive communities - Policy GG3: Creating a healthy city

	<ul style="list-style-type: none"> - Policy GG5: Growing a good economy - Policy GG6: Increasing energy efficiency measures - Policy S12: Minimising greenhouse gas emissions - Policy I3: Energy infrastructure - Policy S14: Managing flood risk - Policy S15: Water infrastructure - Policy S17: Reducing waste and supporting the circular economy - Policy SD1: Developing London’s social infrastructure - Policy S3: Education and childcare facilities - Housing Design Standards LPG <ul style="list-style-type: none"> - Section A1.13, A1.14, A1.15, A1.17: relating to energy efficiency - Section B7: Supplying energy efficiency (being clean) - Section B8: on-site renewables (being green) - Section C6: Thermal Comfort - Section C7.1: Water usage - Housing SPG <ul style="list-style-type: none"> - Section 34: Environmental Performance
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CE1: Climate Change - Policy CE3: Waste - Policy CL2: Design quality - Policy CA4: Earl’s Court Exhibition Centre
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy GB3: Whole life-cycle Carbon - Policy GB4: Energy and Net Zero Carbon - Policy GB5: Overheating - Policy GB19: Waste Management
LBHF Local Plan	<ul style="list-style-type: none"> - Policy CC1: Reducing Carbon Dioxide Levels - Policy CC2: Ensuring Sustainable Design and Construction - Policy CC7: On-site waste management
LBHF Supplementary Planning Documents	<ul style="list-style-type: none"> - LBHF Planning Guidance <ul style="list-style-type: none"> - Key Principle WM4: outside storage of refuse, recycling and food waste - Key Principle WM5: Communal refuse and recycling bins - Key Principle WM7: External storage in flats - Key Principle WM8: Household bulky waste - Key Principle WM9: Commercial developments - Key Principle WM10: Bin accessibility

7.404. This section should be read in conjunction with the Sustainability Strategy, the BREEAM Strategy prepared by Hore Lea, and the Sustainability Statements for Plot EC05 and EC06, and WB03, WB04 and WB05 prepared by Hore Lea.

Sustainability Strategy, including Social Value and Economic Inclusivity

Assessment

Sustainability Strategy

- 7.405. ECDC, on behalf of the Applicant, is committed to the delivery of a Sustainability Strategy for the Proposed Development that is exemplary and ambitious. This means delivering energy efficient buildings and innovative spaces with a focus on enhancing the environment and healthy living, producing economic benefits for the widest number of people, and creating significant social and economic value for the local area.
- 7.406. The submitted Sustainability Strategy has also been prepared to set out ECDC's 'Principles for Future Living'. These include:
- *Beyond Net Zero Carbon*: Aligning with the Mayor of London's Net Zero Carbon targets and surpassing existing environmental policy benchmarks through high performance construction, an all-electric energy strategy and use of renewable energy sources
 - *Delivering Clean Air*: Targeting a new benchmark in urban air quality with regard to creation of a healthier environment on-Site as well as in the surrounding area by achieving pollutant levels that are lower than borough averages
 - *Circular Resource Use*: Commitment to sustainable practices that prioritise responsible use and reuse of resources. Where possible, existing buildings and structures will be retained on-Site, or where demolished, materials will be audited to maximise the potential for their re-use or recycling. New buildings and servicing strategies will be optimised to facilitate the diversion of the majority of waste from landfill
 - *Healthy Living*: Creating spaces that resonate positively with the community, rooted in an inclusive design philosophy guided by insights from the PRIP and wider stakeholder engagement. Thoughtful and inclusive design will provide an access for all to a variety of open spaces for play and recreation, complemented by a considered planting strategy chosen to provide year-round bloom
 - *Water Neutral*: the proposed water management strategy will be integrated into public and private spaces using Sustainable Urban Drainage Systems ("SUDS") to reduce water run-off, rainwater harvesting and storage and infiltration of more than half of rainfall into the ground during storm events. Buildings will also prioritise water efficient features to reduce water usage
 - *Celebrating Nature*: The Proposed Development will deliver a Biodiversity Net Gain ("BNG") well above the 10% required by legislation. Central to this is the landscaped approach to delivering a diverse network of landscaped open spaces throughout the Site, including the planting of over 1,000 new trees, half of which will be semi-mature, adding character and biodiverse variety to the landscape
 - *Certifications*: To provide evidence of adherence to targets, it is intended for the Proposed Development to be assessed to achieve a range of certifications and standards

- 7.407. Using the above principles, the Sustainability Strategy provides a framework, focusing on Environmental Sustainability, Social Value and Economic Inclusion, and explains how, the delivery of high standards of environmental sustainability would be achieved for the Proposed Development. The Sustainability Strategy is supported by Social Value and Economic Inclusion Statements.
- 7.408. Environmental Sustainability is to be delivered through a commitment to a number of energy efficiency, water efficiency, waste management, air quality and healthy living principles, in accordance with, and in a number of cases going beyond the requirements of planning policy at all levels.
- 7.409. Social Value is the quantification of the relative importance that people place on the changes they experience in their lives and the submitted Social Value Statement sets out the range of social value benefits that will be delivered by the Proposed Development.
- 7.410. The submitted Economic Inclusion Statement sets out how the Proposed Development will involve and benefit a large number of people, particularly the local communities around the Site who will be directly and indirectly affected by it during its construction and lifetime.
- 7.411. The provision of sustainable development is a key feature of the NPPF, while Chapter 14 requires the planning process to support the transition to a low carbon future. The London Plan further promotes development moving towards a low carbon economy, and supports development that adapts to a changing climate, and achieves the equivalent of BREEAM excellent 'Wat 01' standards (Policy GG5, GG6, SI5).
- 7.412. At a local level, the RBKC Local Plan further identifies that sustainable development is essential in good design, and the Council will work pro-actively with applicants to secure developments that enhance the economic, social and environmental conditions within the Borough (Policy CL2). Within Policy CE1, RBKC makes it clear that residential development should meet carbon targets set out by the Mayor, and non-residential development above 1,000 sqm should meet BREEM 'very good' criteria. Policy CA4 further requires development at Earl's Court Exhibition Centre to incorporate on-site energy production to contribute to the heat and energy demand of the wider community as part of a district heat and energy network.
- 7.413. Policy CC1 of the LBHF Local Plan requires major developments to implement energy conservation measures, meet the sustainable energy policies set out in the London Plan, and implement passive design measures. Policy CC2 requires the implementation of sustainable design and construction measures.

Sustainability – Outline Components

- 7.414. In accordance with the above policies, the Sustainability Strategy has provided a number of sustainable objectives for the Outline Components, to be incorporated into design of the Detailed Components and detailed designs within each application for RMA that comes forward, to be applied to the Early and All Phases development scenarios:

- Target BREEAM Communities Excellent certification, with an aspiration to achieve Outstanding
- For non-residential buildings, target BREEAM Excellent with the aspiration for Outstanding
- Within office buildings, achieve WELL Gold rating with the aspiration for Platinum.
- For residential buildings, target Home Quality Mark (“HQM”) rating of 4, with an aspiration to achieve 5
- Designing to Passivhaus principles, aiming at high performance for residential uses and considering NABERS UK rating to demonstrate energy efficiency, aspiring to a 5* rating
- Implementation of an all-electric energy strategy when utilising the district network to ensure zero on-site emissions in operation
- Implementation of an ‘Ambient Loop’ energy network
- Achieving at least 10% lower pollutant levels on-Site compared to the Borough averages
- Retaining buildings and structures which are suited for the requirements of the Site, such as The Table
- Creating a fully accessible and inclusive environment with step-free mobility across the Site
- Improvements to wider pedestrian and cycle infrastructure around the site and the provision of play space for all children.
- Achieving over 85% BNG
- Commitments to a minimum of 1,000 new trees, of which 50% will be semi-mature
- Achieving a UGF score of at least 0.4 across the whole Site, which is a significant improvement beyond the current baseline
- Ensuring all landscape is watered using rainfall and grey water from the Site
- Attenuating all rainfall on Site, with it either being used or infiltrated to the ground to reduce runoff rates from the Site by up to 80%. Overall reducing the risk of sewer and surface water flooding for the surrounding area and achieving less than the runoff from a greenfield site, with significantly lower runoffs from the previous uses of the Site
- Designing water efficient buildings, minimising potable demand through the use of low flow fittings, rainwater harvesting and greywater recycling where appropriate, proposing less than a 105 litres of water per person, per day (“l/p/d”), with an aspiration for less than 80 l/p/d in residential buildings

Sustainability – Detailed Components

- 7.415. Within the RBKC Detailed Component, through the use of water efficient fittings and rainwater and greywater harvesting, Plot EC05 is expected to achieve 85-95 l/p/d and Plot EC06 is expected to achieve 95 l/p/d. Within the LBHF Detailed Component, Plot WB03 is expected to achieve 95 l/p/d, and 80 l/p/d within Plot WB05 and WB05.
- 7.416. The non-residential elements of Plots contained within the RBKC and LBHF Detailed Components have been designed to achieve BREEAM 'Excellent' ratings, achieving a pre-assessment score of 74.4%. The residential elements are targeting HQM 4 and the proposed designs start with a pre-assessment score of 303 in Plots EC05 and EC06 in RBKC, with WB04 and WB05 achieving a pre-assessment score of 298. These certifications all exceed relevant planning policy requirements.
- 7.417. The Sustainability Strategy sets out how the Proposed Development aims to implement a range of sustainable design principles, which includes a reduction on water usage and compliance with the BREEM criteria, in accordance with the NPPF, Policy GG5, GG6, SI5 of the London Plan, Policy CL1, CL2 and CA4 of the RBKC Local Plan and Policy CC1 and CC2 of the LBHF Local Plan.

Socio-Economics / Social Value / Economic Inclusion

- 7.418. This section should be read in conjunction with the ES Socio-Economics Chapter, Social Value Statement and Economic Inclusion Statement.

Social Value

- 7.419. The submitted Social Value Statement describes how the Proposed Development will create social value for those living in, working in and visiting the Site.

Outline Components

- 7.420. The calculation of social value for the Outline Components is based on the Development Specification and, where indicative land use mix information is required, the Illustrative Masterplan, to consider nearly 400 separate outcomes across all of the Plots. The outcomes include affordable housing, enhanced environmental quality (e.g. Table Park) increasing wellbeing, new employment opportunities, creation of employment prospects for unemployed people, cultural venues creating pride and sense of place, crime prevention methods to make people feel safe, the provision of Older Persons Housing facilities, and the creation of a car lite development which creates public benefits through reduced noise and disturbance from traffic.
- 7.421. On the basis of the separate outcomes, the predicted total social value for the Outline Components could result in the region of £371.4m worth (when considering a 10-year impact period from the completion of each plot). The social value estimated by each Plot is likely to increase further as additional detail regarding their uses is confirmed.

- 7.422. Of the total £371.4m calculated, approximately £200.9m is expected to be delivered by the Plots (i.e. Not considering site-wide features), and of this £200.9m, the value of Phases 1-4 (Early Phases) is £144.4m and the value of Phases 5-8 (additional land included in the All Phases) is £56.5m.
- 7.423. This represents a substantial amount of potential social value that could be generated by the Proposed Development.

Detailed Components

- 7.424. Based on 130 separate outcomes across all Plots, the predicted social value of the Detailed Components is approximately £59.7m over 10 years. The separate outcomes include factors such as the provision of PBSA to support students achieving degree-level qualifications and above, affordable housing, people learning new/ developing skills and children making new friends from after school activities within the Community Centre. The Community Centre would also improve the wellbeing of adults, creating a space for socialisation within the community café.

Social Value Summary

- 7.425. The work done by ECDC, on behalf of the Applicant, described by the submitted Social Value Statement and set out in the SCI demonstrates that there has been consistent commitment to the social support and development of the local area. This work will continue through the development stage of the project and beyond, with commitments reinforced by further Social Value Statements within future RMAs.

Economic Inclusion

- 7.426. The purpose of the Economic Inclusion Statement is to set out ECDC's economic inclusivity ambitions, which has helped to inform the design of the Proposed Development to ensure the needs and preferences of people with a wide range of incomes are catered for and considered. To ensure the delivery of economic inclusivity, the three overriding principles are to:

- Maximise appropriate economic growth
- Provide access to economic opportunities for all
- Create an affordable community

- 7.427. The ambition to maximise appropriate economic growth would be delivered through:
- Making a positive contribution to growing the local economy: the Proposed Development is estimated to deliver a net increase in job opportunities, providing in the region of 12,000 FTE jobs and £1.4bn of GVA per year to the economy
 - Encouraging inward investment through the creation of a large-scale, high-quality, mixed-use development based on sustainable and inclusive principles. A focus on Climate Tech will encourage and secure inward investment into the area by contributing to national and international goals towards net zero

- The overall number of employment opportunities will be maximised with an intended focus on Climate Tech, which would represent a new sector of development within West London, preventing the displacement of existing businesses in the area
- The diverse offering of land uses helps stimulate a diverse local economy, preventing domination by a single sector, benefitting a wide range of people and organisations, and helping to build economic resilience

7.428. The ambition to provide access to economic opportunities for all would be delivered through:

- Maximising opportunities for education, training and up-skilling through the Earls Court Skills Centre. This will expand on the existing education programme (where built environment professionals go into schools to teach about STEMMM and development-related career paths), through an on-Site Climate Tech skills programme which is currently being developed, and through a focus on pathways to improve the economic prospects of disadvantaged groups and the long-term unemployed
- ECDC's 'Future' programme has been developed to prepare young people for the working world with a series of fun and engaging employability and personal development workshops. Kids would also have access to work-based opportunities such as apprenticeships, training and courses through this programme
- ECDC will reach out to all the wider community to ensure they are empowered to access the economic opportunities on the Site. This would be achieved through supporting and financing a range of targeted interventions to improve awareness of economic activities and the use of the Skills Centre. The Earls Court Community Centre, which opened in 2022, is proposed to continue to offer employability support for local people

7.429. The ambition to create an affordable community would be delivered through:

- A diverse and inclusive housing offer, which provides a range of house types, designs and specifications, with particular consideration of the local housing need. The Proposed Development will include significant amounts of new residential floorspace, which could deliver up to 460,000 sqm (GEA).
- Provision of a variety of commercial floorspace, including affordable workspace, suitable for different occupiers. The range of affordable workspace will aim to meet demand from larger to smaller organisations, including micro-organisations and individuals. The inclusion of adaptable and flexible E Class Business space in terms of type, use and size would help to meet the needs of micro- small and medium size enterprises
- Business and innovation support and advice systems to help small businesses, community and social enterprises flourish
- Designing opportunities for lower running costs to commercial occupiers
- The provision of designated spaces for the community such as the Community Centre, the Earl's Court Community Fund to support the development of local

projects that deliver community activities and support local residents and creating a strong cultural offer to enhance well-being and create a sense of shared belonging and identity

Detailed Component

7.430. The three overriding economic principles have been carried through within the design of the Detailed Component, as evidenced below:

7.431. Maximising economic growth:

- Job opportunities within the Detailed Component will be facilitated by the delivery of 6,070 sqm of retail, F&B, leisure, office and cultural floorspace
- Meanwhile uses will also continue during and after the delivery of the Detailed Components (as the Outline Components are delivered), which generated approximately 600 FTE jobs, nearly £13m GVA and net additional expenditure of £25.7m in the local economy in the last 12 months to October 2023
- A wide mixture of uses within each individual plot, and at the start of the Proposed Development

7.432. Access to economic opportunities for all:

- The Earls Court Skills Centre which began as a meanwhile use will continue through the delivery of the Detailed Component and beyond
- The Earls Court Community Centre will be relocated from its current meanwhile location to an area within the Detailed Component

7.433. Affordable Community:

- Delivery of affordable housing and affordable PBSA bedrooms
- Community facilities
- Affordable workspace
- Delivery of a Community Centre within Plot WB05 within the LBHF Detailed Component

Economic Inclusion Summary

7.434. The three main principles of economic inclusion: maximising economic growth; providing access to economic opportunities; and creating an affordable community, would bring together a range of ambitions and commitments, ensuring that the Proposed Development caters for the needs and preferences of people on a wide range of income levels to create a mixed and balanced community, in accordance with relevant planning policies.

Socio-Economics

7.435. The Socio-Economics assessment included in the Socio-Economics ES Chapter focusses on key social and economic considerations, including the creation of jobs, new homes, and the demands of the new population on community facilities such as schools and health

centres/ GPs to understand the impacts of the Early Phases and All Phases development scenarios.

- 7.436. Within the Outline Component, the scenario with a minimum number of residential units has been considered for the creation of new home. The population mix has been modelled based on an indicative unit mix based on the maximum parameters to assess the likely 'worst-case', and the residual floorspace assigned to the least employment yielding floorspaces has been used to calculate employment creation. The actual new homes, population yield and employment generation etc within the Outline Component will be determined through future RMAs.
- 7.437. Within the Detailed Components, the new homes assessment is based on the actual provision of new homes, including student accommodation (using housing delivery targets on the basis of a 2.5:1 ratio) with the population estimate based on the proposed number of homes and mix (including size, type and tenure). Employment creation has been modelled off from the proposed non-residential floorspace areas.
- 7.438. Demolition and construction-related employment expected to be generated by the Early Phases and All Phases has been assessed using the Construction Industry Training Board (CITB) Labour Forecasting Tool.

Early Phases

- 7.439. The demolition and construction phase would result in the displacement of existing uses, many of which are temporary and on short term leases (concluding prior to the commencement or works). The apartments at 5 Cluny Mews would be retained. The Cluny Mews office would be demolished. However, the building is largely vacant and supports very few jobs, being occupied on a temporary, short term basis by charitable organisations.
- 7.440. The Early Phases would provide a range of beneficial effects:
- Generate an average of 1,230 construction jobs over the duration of the demolition and construction period
 - Deliver a minimum of 1,674 new homes and 696 PBSA bed spaces, making a considerable contribution towards housing supply with moderate beneficial effects
 - Accommodate a minimum of 6,990 jobs on-Site which would result in a net increase of 5,955 jobs in RBKC and LBHF and 2,935 jobs in London
 - New cultural, retail, community/social infrastructure floorspace and new leisure floorspace
 - Substantial new open space in an area of open space deficiency including on-Site playspace
- 7.441. The assessment finds that the Early Phases development would have negligible effects on local services such as health and education due to increased population, but these could be adequately mitigated through appropriately worded S106 contributions towards the

maintenance and improvement of local services. It would, however, result in beneficial effects as a result of the delivery of new homes, PBSA bedrooms, employment generation and opportunities for increased spending in the local economy, in addition to the provision of new social infrastructure, public realm and open space.

All Phases

7.442. The All Phases development would also provide a range of beneficial effects, which include:

- The delivery of at least 2,650 new homes and 696 PBSA bed spaces making a considerable contribution towards the housing supply in LBHF and RBKB (major beneficial effect)
- The new residential population, students and employees would have a beneficial effect on the local economy through increased spending, which is estimated to be in the region of £35 million for annual household spending, £5.5 million for annual student spending and £25 million for annual employee spending (based on a minimum of 8,000 net additional jobs in RBKB and LBHF)
- A minimum of 10,300 jobs on-site which would result in a net increase of 8,000 jobs in LBHF and RBKB and a net increase of 3,950 jobs in London, so approximately 12,000 jobs created overall
- New cultural, retail, community/social infrastructure floorspace and new leisure floorspace
- Substantial new open space in an area of open space deficiency including on-Site playspace

7.443. The assessment finds that the All Phases development would result in negligible adverse effects on local services such as health and education due to increased population, with adequate mitigation through either the on-Site provision of facilities (in the case of health) or appropriately worded S106 contributions towards the maintenance and improvement of local services. The Proposed Development would result in range of significant beneficial effects as a result of the delivery of new homes, PBSA bedrooms, employment generation and opportunities for increased spending in the local economy, in addition to the provision of new social infrastructure, public realm and open space.

7.444. On this basis, the Proposed Development accords with Chapter 8 of the NPPF, and London Plan Policy GG1. The Proposed Development would also support employment, skills, development, apprenticeships and other education and training as required, in both the construction and end-use stages, through S106 obligations (where necessary), in accordance with London Plan Policy E11.

Energy Strategy

Assessment

7.445. The submitted Energy Strategy sets out how it supports the wider 'Beyond Net Zero Carbon' target identified in the Sustainability Strategy. It aims to achieve Net Zero Carbon, which

means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy set out in London Plan Policy SI 2 of 'Be Lean, Be Clean, Be Green and Be Seen'.

- 7.446. At a national level, NPPF para. 159 requires development to be planned in ways that reduce greenhouse gas emissions, while both local and national policy requires development to be Zero-Carbon. Policy SI2 of the London Plan further requires the minimisation of both annual and peak energy demand in accordance with the energy hierarchy. Development must also achieve a 35% reduction in target carbon dioxide emissions against Building Regulations part L 2013 levels and the remaining amount for domestic elements to be off-set through a cash in lieu contribution to the council.
- 7.447. At a local level, Policy GB4 of the RBKC Draft Local Plan and Policy CC1 of the LBHF Local Plan require all major development to be accompanied by an Energy Strategy, demonstrating how developments have optimised building design to reduce energy demand and carbon dioxide emissions.
- 7.448. The proposed strategies and initiatives will go beyond the requirements of relevant policy to consider impacts beyond the performance of buildings. It sets out the following initiatives to help achieve this target:
- Implement a progressive 5th generation 'Ambient Loop' energy network, providing heating and cooling to the Proposed Development and beyond, which will reduce energy consumption and enable Site-wide CO₂ emissions savings of over 65% compared to a gas boiler-based strategy
 - Deliver net zero carbon on-Site emissions for all buildings, Plots, and public realm functions in operation, when connected to the 5th generation 'Ambient Loop' energy network
 - Design residential buildings using Passivhaus principles where practicable and where possible, aiming at high environmental performance for residential uses
 - Implement Solar Photo Voltaics ("PV"), or other suitable renewable energy sources, on selected, appropriate green roofs (e.g. bio-solar roofs) across the Proposed Development, providing at least 280kWp of installed capacity, generating enough energy annually for over 65 homes
 - Set a voluntary target 'carbon budget' for all buildings, Plots, and Proposed Development Components, which aims to go beyond policy to include emissions associated with the operation of public realm and infrastructure
 - Co-locate energy network plant and equipment to minimise embodied carbon, maximise operational efficiency and create more opportunities for amenity use
 - Reduce the up-front embodied carbon of buildings, targeting less than 500kgCO₂/m² for domestic and less than 650kgCO₂/m² for non-domestic uses
- 7.449. The submitted Energy Strategy has been developed using a 'fabric first' approach in line with the London Plan energy hierarchy, resulting in a net-decrease in carbon dioxide

emissions. The Energy Strategy provides a framework for the Outline Components, with separate Sustainable Design Performance Statements provided for the Detailed Components to set out how they perform. Passive design and energy efficiency measures will provide the basis for reducing the energy demand and CO₂ emission reduction achieved for the Proposed Development. It is envisaged that commitments and targets set out within the Energy Strategy will be translated into appropriately worded S106 Agreement obligations.

Outline Components

- 7.450. The Earls Court Development has adopted an all-electric strategy, using a 5th generation 'ambient loop' energy strategy sharing network to satisfy the heating, hot water and cooling demands through the use of ASHPs and WSHPs. Bio-solar roofs will also be implemented within the Outline Proposals.
- 7.451. Through 'Be Lean' measures, it is anticipated that the Outline Components will achieve over 65% reduction in carbon dioxide emissions on site, exceeding the London Plan Policy target of 35%.
- 7.452. Energy demand in the development would also be significantly reduced. It is anticipated that up to a 24% reduction in carbon dioxide emissions will be achieved at the 'Be Lean' stage, exceeding the London Plan target of 10%.
- 7.453. The remaining unregulated energy and carbon dioxide emissions will be off-set through a cash in lieu contribution that will be kept under review, but is currently estimated at around £8.5 million (based on £95/Tonne for a period of 30 years) based on information that is currently available in advance of detailed designs for the Outline Components coming forward at the detailed design stage.

Detailed Components

- 7.454. All of the Plots within the RBKC and LBHF Detailed Components will be provided with air source heat pumps ("ASHP") and water-source heat pumps ("WSHP"), connected to an ambient loop system.
- 7.455. The Detailed Proposals significantly exceed the London Plan minimum target of 35% reduction in carbon emissions, with an overall on-Site reduction of 61% (Plot EC05) and 68.5% (Plot EC06) in regulated carbon dioxide emissions over Part L 2021 within the RBKC Detailed Component and on on-Site reduction of 59.55% (WB03), 68.96% (WB04) and 71.3% (Plot WB05) within the LBHF Detailed Component.
- 7.456. Energy demand in the Detailed Components has been significantly reduced, exceeding the London Plan target of 10%. The RBKC Detailed Component achieves a reduction of 17.07% (Plot EC05) and 22.3% (Plot EC06) in regulated carbon emissions over Part L 2021 at the 'Be Lean' stage of the hierarchy, through passive design and energy efficiency measures. The LBHF site achieves a reduction in 1.23% (WB03), 25.74% (WB04) and 20.7% (Plot WB05). While Plot WB03 does not achieve the full 10% reduction in energy demand, all

plots within the LBHF Detailed Component achieve approximately 16% reduction in energy demand.

- 7.457. The remaining unregulated energy and carbon dioxide emissions is proposed to be off set through a payment in lieu contribution of £473,015 to RBKC and £795,000 to LBHF (based on £95/Tonne for a period of 30 years).
- 7.458. To ensure the energy use can be accurately measured and monitored, a robust metering strategy will be implemented.
- 7.459. Having regard to the above, the Proposed Development will accord with, and in many respects exceed the requirements of the NPPF, London Plan Policies GG6, SI2, SI3, RBKC Local Plan Policy CA4, RBKC Draft Local Plan Policy GB4 and LBHF Local Plan Policy CC1.

Overheating Strategy

Assessment

- 7.460. This section should be read in conjunction with the submitted Overheating and Thermal Comfort Statement and the Sustainability Statements for Plots EC05, EC06 and WB03, WB04 and WB05. These documents detail how thermal comfort will be maintained throughout summer conditions, both now and in the future, in accordance with Policy at all levels.
- 7.461. At a national and local level, Policy SI4 of the London Plan the London Housing SPG and Policy GB5 of the Draft LBKC Local Plan requires the design of development to reduce overheating and reliance on air conditioning systems. Policy GG6 of the London Plan further notes that buildings and infrastructure should be designed to adapt to a changing climate, reducing impacts from heatwaves, while mitigating and avoiding contributing to the urban heat island effect.

Outline Components

- 7.462. The approach to buildings designed with the Proposed Development is to minimise overheating risk through passive design measures first and reduce reliance on active cooling to provide thermal comfort, balanced with the requirements of other design considerations, including noise performance and access to daylight within residential units. The following hierarchy of mitigation methods is proposed to be used in combination, where appropriate:
- Minimise internal heat generation through energy efficient design
 - Reduce the amount of heat entering the building in summer
 - The implementation of external solar shading
 - Passive ventilation
 - Mechanical ventilation
 - Active cooling

- 7.463. The thermal overheating performance of the outline proposals will be confirmed through the detailed design process as application(s) for RMA come forward. The approach is the same for Early and All Phases.

Detailed Components

- 7.464. An overheating / thermal comfort analysis has been undertaken for each Plot within the Detailed Components to ensure an appropriate level of thermal comfort is maintained through summer conditions.
- 7.465. Within the residential buildings, through a series of external shading methods such as boosting Mechanical Ventilation with Heat Recovery (“MVHR”) units and other Plot-specific measures such as tempered cooling, Plots contained within the Detailed Components achieve compliance with DSY1, DSY2 and DSY3 2020 weather files and DSY1 and DSY2 2050 weather files, demonstrating that they would not result in overheating, and are resilient against future climate scenarios.
- 7.466. A dedicated thermal assessment was not applied to the non-residential spaces, although excessive thermal gains were assessed as part of Criterion 3 of the energy (Part L2) assessment, and measures including improving the g-value of the glazing and adding adequate shading to reduce peak solar gains have been applied.
- 7.467. On this basis, the Detailed Components accord with Policy SI4 and GG6 of the London Plan, and Policy GB5 of the Draft RBKC Local Plan.

Whole Lifecycle Carbon and Circular Economy

- 7.468. This section should be read in conjunction with the submitted Whole Lifecycle Carbon (“WLC”) and Circular Economy Strategy, the Sustainability Statements for Plots EC05, EC06, WB03, WB04 and WB05 and the Framework Construction Site Waste Management Plan.

Assessment

- 7.469. WLC and Circular Economy assessments have been undertaken to set out key targets to enable efficient use of natural resources and subsequently compare the carbon emissions of the Proposed Development in accordance with planning policy at all levels.
- 7.470. London Plan Policy GG6 seeks to improve energy efficiency and support the move towards a low carbon circular economy. Policy SI7 further sets out that resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by promoting a more circular economy, to improve resource efficiency and innovation, keeping products and materials at their highest use for as long as possible. The London Housing Design Standards SPG and Policy GB3 and GB19 of the RBKC Draft Local Plan require development referable to the Mayor of London to submit a Circular Economy Statement and a Whole Life Carbon Assessment.

7.471. Under Policy GB19 of the RBKC Draft Local Plan, all development is expected to recycle construction, demolition and excavation waste on-site where practicable, with 95% of construction and demolition waste reused, recycled or recovered.

Circular Economy

7.472. The submitted Circular Economy Statement sets out the strategic approach to Circular Economy that is proposed to be implemented for the Site. It is focused on defining an approach to principles for the Site and identifying high level strategic opportunities as early as possible in the development process.

7.473. The buildings and structures on the Site have been reviewed in terms of their potential to be retained and their suitability for the Site's future redevelopment in accordance with the decision tree in the Mayor of London's Circular Economy Statements LPG, having regard to the Site's Opportunity Area location and Local Plan allocations. This has included exploration of alternative design options for existing buildings / structures with potential to be retained, which have informed analysis that they do not meet the requirements for the Site before a conclusion is reached to propose their demolition.

7.474. All buildings and structures proposed for demolition, partial demolition or potential demolition have been analysed as part of the Circular Economy Statement to justify their proposed full or partial demolition, with a plan for on-Site recycling of over 95% of the material, in accordance with planning policy.

7.475. All new buildings have been designed around Circular Economy and low WLC principles to maximise recycled content, minimise waste and use low carbon materials. Whole life carbon budgets have been set for all buildings, plots and Development Components, providing a carbon ceiling to show carbon reductions are in line with current policy.

7.476. In line with Adopted policy, the Circular Economy targets for the Proposed Development in Early and All Phases are as follows:

- 95% of demolition waste materials will be diverted from landfill for reuse, recycling or recovery (over 90% of reuse is assumed on Site)
- 95% excavation waste materials to be diverted from landfill for beneficial reuse.
- Over 95% of construction waste materials to be diverted from landfill for reuse, recycling or recovery
- 65% of municipal waste to be recycled
- Use materials in the Proposed Development which minimise carbon impacts targeting 20% of materials that are reused and/or contain recycled content

7.477. With regard to the RBKC (Plots EC04 and EC05) and LBHF (Plots WB03, WB04 and WB05) Detailed Development, the approach to the circular economy is to minimise quantities of materials used for sub and superstructure; manage construction waste and manage excavation waste in line with the Site-wide strategies for the Outline Components, in accordance with relevant planning policy.

Construction Site Waste Management

- 7.478. Planning policy at all levels requires construction to comprise of sustainable waste behaviour, such as re-use and recycling construction and demolition waste, recycling and segregating waste materials when feasible to reduce the amount of waste going to landfill. The methods of achieving sustainable waste practices include a number of circular economy commitments, including the segregation of construction waste to be recycled and the monitoring of waste streams to help meet identified waste targets. These aims are outlined within the framework Construction Waste Management Plan (“CWMP”) which accompanies the Hybrid Applications.
- 7.479. Main contractors and sub-contractors will prepare a detailed Site Waste Management Plan (“SWMP”) prior to commencing works on Site, ensuring that the proposed development complies with construction waste policy at all levels, including London Plan Policy S17, LBHF Policy CC7, RBKC Local Plan Policy CE3(g), and Draft RBKC Local Plan Policy GB19(j).

Whole Lifecycle Carbon

- 7.480. The WLC Assessment has been prepared to report the performance of the Proposed Development at a number of life cycle stages through the development process, in line with industry standards. This begins with raw material extraction, moving through product manufacture, transportation, and installation. It then continues into maintenance and use of a Site during operation, and eventual material disposal at the end-of-life stage.
- 7.481. To ensure the re-use of materials is maximised on-Site for the Outline Components and that WLC emissions are minimised, each application for RMA will:
- Re-audit the relevant buildings, produce a full materials schedule for these existing buildings
 - Consider the re-use of material and avoidance from landfill by material class
 - Maximise material reuse on Site, undertake whole life carbon analysis for each proposed scenario and compare the whole life carbon emissions to the breakeven analysis points contained within the Whole Life Carbon and Circular Economy Strategy
- 7.482. The WLC from the Detailed Components have been calculated, demonstrating that the average upfront carbon (A1-A5) for Plots EC05, EC06, WB03, WB04, WB05 is 604kgCO₂e/m², and the average embodied carbon emissions (B1-B5, C1-C4) is 488kgCO₂e/m². These results indicate that all Plots contained within the Detailed Components perform better than the GLA ‘Baseline’ benchmark for upfront carbon (A1-A5).
- 7.483. The above strategy ensures that a range of circular economy principles are integrated into the design and construction and waste management of the Proposed Development, and resulted in upfront carbon calculations that improve from the GLA baseline, and overall reduce construction waste, in accordance with Policy GG6 and S17 of the London Plan, the London Housing Design Standards SPG, and Policy GB3 of the Draft RBKC Local Plan.

Household and Commercial Waste

7.484. This section should be read in conjunction with the submitted Operational Waste Management Plan, the EC05 and EC06 Waste Management Strategy and the WB03, WB04 and WB05 Waste Management Strategy.

Assessment

7.485. A Waste Management Strategy has been prepared for the Site, which includes the aim to achieve or exceed the London Plan target to recycle 65% of household waste; provide facilities at suitable locations that meet the storage and recyclable needs of the RBKC and LBHF, to encourage the use of compaction and consolidation where appropriate, and to encourage a culture of re-use on the site, in accordance with planning policy at all levels.

7.486. At a national level, Para.20(b) of the NPPF requires strategic policies to make provision for waste management, alongside other requirements. Policy D6(e) of the London Plan requires housing to be designed with easily accessible storage space that supports the separate collection of dry recyclables, food and residual waste.

7.487. At a local level, RBKC Local Plan Policy CE3 and Draft RBKC Local Plan Policy GB19 requires on-site waste management facilities as part of development proposals at Earls Court, to handle waste arising from the new uses on site. The LBHF Planning Guidance SPD provides additional waste specification requirements, such as adequate space for the storage of recyclables and non-recyclables, and areas for bulky waste within multiple occupancy developments.

Waste Management Strategy – Outline Components

7.488. It is proposed that each residential property will be provided with a segregated waste bin in their kitchen which allows refuse, recycling and food waste to be segregated. The majority of household waste will then be stored in a communal waste facility prior to collection.

7.489. For non-residential units, waste strategies will be developed depending on the proportion of commercial community activities within each plot and whether each tenant has dedicated ground floor access points.

7.490. Non-residential unit tenants within a residential block that have ground floor access will be responsible for providing their own waste storage facilities during their fit-out and for arranging waste collections through a licenced commercial waste contractor, or through arrangement with RBKC or LBHF.

7.491. Non-residential unit tenants within a residential block that do not have ground floor access will be provided with either a dedicated waste store or communal waste storage.

7.492. Dedicated communal waste storage areas will be managed by the Plot management team which will appoint either a licenced commercial waste contractor or make arrangements through RBKC or LBHF to collect the wastes and will recover the costs from the tenants.

- 7.493. Waste generated from the public realm including litter bins and landscape maintenance will be managed by the estate management team. It will not be managed via the residential or commercial waste facilities detailed within the waste management strategy.
- 7.494. The Illustrative Masterplan has been tracked to ensure that the roads within the Site are appropriately designed to accommodate refuse collection requirements. Servicing bays have been located, where appropriate, to facilitate collection.
- 7.495. Detailed Waste Management strategies will be provided for each Plot to support future applications for RMA.

Waste Management Strategy – Detailed Developments

- 7.496. Each Plot contains a dedicated waste strategy which incorporates:
- Sufficient internal waste storage containers to promote the separation of recyclable materials at source
 - Residential chutes where appropriate, or the provision of waste storage areas which allow for the appropriate segregation of waste
 - Provision of bulky waste storage for residential properties
 - PBSA waste in WB03 will be classified as commercial wastes and collected by a commercial waste contractor. Students will be provided with suitable waste bins within their bedrooms and communal areas that allow the separation of refuse and recycling
 - Commercial properties within Plots EC05 and EC06 will receive provision of access into waste storage at level B1
 - Retail/ F&B/ Flexible Commercial area wastes within WB03 will be the responsibility of individual tenants, requiring the suitably sized waste storage area as part of their fit-out and appointing a suitably licenced commercial waste management contractor. The size of the waste storage area will be based on the likely volumes of waste that will be generated and the frequency that it will be collected
 - With regard to the Retail/ R&B/Flexible Commercial and Leisure waste within Plot WB04, tenants will be provided with access to a communal waste storage area at lower ground floor level
Within Plot WB05, the Retail/F&B/Flexible commercial area will be provided suitable storage areas as part of the fit-out of the tenanted spaces
- 7.497. Residential properties will have a waste collection contractor appointed to them, who will empty the communal bins, bulky items and dedicated storage areas for dwellings without communal bins.
- 7.498. Non-residential units that do not contain communal bin facilities will be responsible for managing their own wastes, including producing the services of a suitably licensed waste management contractor.
- 7.499. Nominated areas and parking bays are provided to enable the collection of bins by nominated waste management contractors.
- 7.500. The Outline and Detailed Component waste management strategies have taken into account the need to lessen the overall impact of waste generation, and to sufficiently

manage waste generation in line with the NPPF, London Plan Policy D6(e), RBKC Policy CE3, Draft RBKC Policy GB19, and the LBHF Planning Guidance.

Transport

Relevant Policy Context

7.501. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
<p>NPPF</p>	<ul style="list-style-type: none"> - Chapter 9: Sustainable transport - Para. 109 relates to focussing development in sustainable locations with a genuine choice of transport modes - Para.111 notes that local parking standards for all development should take into account the accessibility, type, mix and use of the development, public transport opportunities, local car ownership and the need to ensure an adequate provision of space for charging plug-in and ultra-low emission vehicles. - Para.115 notes that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety - Para.116 notes that priority should first be given to pedestrian and cycle movements, address the needs of people with disabilities and reduced mobility, create places that are safe, secure and attractive, allow for the efficient delivery of goods, and be designed to enable charging of plug-in and other low emission vehicles in safe, accessible and convenient locations. - Para.117 requires all developments that would generate significant amounts of movement to provide a travel plan.
<p>London Plan</p>	<ul style="list-style-type: none"> - Policy GG5(g): Growing a good economy - Policy T1: Strategic approach to transport - Policy T2: Healthy Streets - Policy T3: Transport capacity, connectivity and safeguarding - Policy T4: Assessing and mitigating transport impacts - Policy T5: Cycling - Policy T6: Car parking - Policy T7: Deliveries, servicing and construction - - Housing Design Standards LPG <ul style="list-style-type: none"> - Section A1.5: Response to the context and climate emergency - Section A3: Streets - Section B2.1: Storage of bicycles - Section B4: Car parking - Housing SPG <ul style="list-style-type: none"> - Section 21: Cycle storage

	<ul style="list-style-type: none"> - Section 19: siting and organisation of car parking
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CO3: Strategic objective for better travel choices - Policy CT1: Improving alternatives to car use - Policy CD7: Servicing
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy D1: Street network - Policy T3: Living streets - Policy T5: Land use and Transport - Policy T6: Active Travel - Policy T8: Car Parking - Policy T9: Servicing
LBHF Local Plan	<ul style="list-style-type: none"> - Policy T1: Transport - Policy T2: Transport Assessment and Travel Plans - Policy T3: Increasing and promoting opportunities for cycling and walking - Policy T4: Vehicle parking standards - Policy T5: Blue badge parking - Policy FRA1: Earl's Court and West Kensington Opportunity Area - - Earl's Court Placemaking Framework <ul style="list-style-type: none"> - Section 3.2 relates to convenient and appealing connections

7.502. This section should be read in conjunction with the submitted Transport Assessment, Framework Travel Plans and Transport ES Chapter.

Assessment

Impacts of the Proposed Development on Public Transport

7.503. Planning policy at all levels directs development to be located in the most accessible areas where transport requirements can be met in a sustainable manner. Efforts should also be made to improve public transport provision, and mitigate potential negative effects on capacity and infrastructure, where possible.

7.504. The Site is very well located in respect of access to a variety of modes of public transport, with the majority of the Site benefiting from a PTAL of 6a-6b (the best). It benefits from easy access to frequent bus services operating across London located near/ adjacent to the site. The Warwick Road (A3220) (Earls Court Stop A) bus stop contains the 328, C3, 74 and C1 bus service which has services every 8-15 minutes. The North End Road (B317) (Stop BH) bus stop contains the 306 and 28 bus routes which has services every 8-20 minutes. The Lille Road (A3218) (Stop BA) bus stop contains the 74, 430 and 190 bus route which contains services every 8-20 minutes. The Route 190 also features a terminating bus stop on the site within the Lillie Road Bus Layover. Overall, there are a total of 24 Public Waiting Areas in close proximity to the site.

7.505. The Site is also located adjacent to three London Underground Stations (Earls Court, West Brompton and West Kensington). These stations provide access to the District Line, with

Earls Court also providing access to the Piccadilly Line and West Brompton providing access to the WLL. These stations provide regular services through the AM and PM Peaks.

- 7.506. The transport strategy for the Proposed Development has been developed through pre-application engagement with RBKC, LBHF and TfL transport and highways officers, including an extensive transport modelling exercise, to maximise pedestrian and cycle access and pedestrian priority in the public realm. The Proposed Development is also designed to be 'car light' (with disabled parking only for residents and limited parking for essential trades and carers) and no through routes are provided for buses or vehicles, with priority given to high-quality walking routes and proposed connections between the Site and the local cycle network.
- 7.507. The Transport Assessment highlights the highly accessible nature of the Site and the Proposed Development in relation to sustainable transport modes and assesses whether the existing public transport network could accommodate the Proposed Development. The assessment finds that there is sufficient rail network capacity to accommodate the proposed development, with additional mitigation proposed to reduce impacts on existing stations. Additional infrastructure is proposed to support local bus services to the Early Phases/ All Phases development. Appropriately worded S106 Agreement obligations will be agreed with RBKC, LBHF, GLA and TfL to secure the necessary improvements to public transport infrastructure.

Buses

- 7.508. The bus assessment focusses on route and bus stop capacity within the existing network through a bus stop audit. The assessment found the bus network can accommodate the demand arising from the Proposed Development in all the phases of development assessed (Early Phases and All Phases). Bus stop demand is expected to be concentrated within a small number of stops surrounding the site (West Kensington Tesco, Warwick Road outside Earls Court Station and Empress State Building on Lillie Road), although the assessment has treated demand in addition to the overall public transport demands and has therefore represented a 'worst case' assessment.
- 7.509. The highway and junction improvements referred to in the 'highways' and 'pedestrian and cycle network' sections of this chapter would improve pedestrian accessibility to existing bus stops within the surrounding area, increasing the useability of sustainable transport modes.
- 7.510. It is proposed that the Lillie Road TfL bus layover facility will be reconfigured as part of the LBHF Outline Component to provide an enhanced facility and incorporate bus stop provision for Route 190 (while terminating Bus Stop T which currently exists in this location). This would allow the route to commence within the Site and improve the overall PTAL characteristics of this area. Further details of the reconfigured facility will be confirmed at RMA stage.

Rail

- 7.511. The rail network impacts have been tested in terms of network and station capacity. The network capacity review identified that the network will be busy in the future years of 2031 and 2041, but the overall impacts of the Proposed Development will be sufficiently low for the level of crowding anticipated to remain within an expected range for a busy urban rail network during peak hours and is therefore acceptable. Nonetheless, detailed micro-simulation modelling of the three stations next to the Site has also been undertaken. This process has resulted in potential mitigation being required, the scope of which will be subject to further discussion with RBKC, LBHF and TfL officers during the determination period for the Hybrid Applications.
- 7.512. A 'monitor and manage' approach to the implementation of transport mitigation as it is required during the delivery of the development is proposed, which could be secured through appropriately worded S106 obligations.
- 7.513. The Proposed Development has been assessed having regard to the accessibility of the Site and its impact on the existing public transport network, with suggested potential mitigation proposed where necessary to ensure the acceptability of the Proposed Development, in accordance with the NPPF, London Plan Policy GG5, T1, T2(c), T3 (part), T4, RNKC Draft Policy T5, and LBHF Policy T1, FRA1, HO7 and HO9.

Highways

- 7.514. The submitted Transport Assessment details the impact of the Proposed Development on the local highway network.
- 7.515. NPPF para. 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe. London Plan Policy T4 requires new development to have an acceptable impact on the highway network, incorporating mitigation where necessary, adopting a Healthy Streets Approach with active modes of travel prioritised. At a local level, RBKC Policy CO3 notes that better travel choices for walking, cycling and public transport should be preferred by residents and visitors to private car ownership use. Policy T2 of the LBHF Local Plan requires all development proposals to be assessed for their contribution to traffic generation and their impact on congestion, particularly bus routes and on the primary route network.
- 7.516. The Proposed Development will prioritise active travel and proposes a pedestrian priority public realm. To facilitate this, vehicular routes have been limited to the periphery of the Site, a 'car-light' approach to minimising car parking has been adopted and servicing movements are proposed to be segregated from the public realm where possible with opportunities for consolidation explored to minimise the number of trips to/from the development.
- 7.517. The proposed street network has been designed to accommodate low volumes of vehicular traffic, with the vehicular access strategy limiting on-site vehicular access to those trips that

need to take place such as servicing, emergency vehicles, blue badge parking and for those who need direct access to plot (such as the mobility impaired).

- 7.518. The 'car-lite' nature of the scheme will result in a limited generation of vehicular trips. As such, any traffic analysis has related to servicing as well as any existing and future operational traffic that are likely to be generated by the Proposed Development.
- 7.519. To assess the impact of the Proposed Development on the local highway, a junction capacity assessment has been undertaken for the existing junctions surrounding the Site, alongside Site access points where appropriate. The modelling results indicate that all junctions operate within their designed capacity in all scenarios assessed (2022 Base, 2031 Base Minus, 2031 Early Phases, 2041 Base Minus and 2041 All Phases), aside from the A4 West Cromwell Road / North End Road junction which operates slightly over capacity within the AM peak of the 2041 All Phases scenario.
- 7.520. No highway geometry changes are proposed to the A4 West Cromwell Road / North End Road junction, but proposed highway and cycle improvements include the widening of controlled crossings to improve pedestrian safety, alongside a new pedestrian and cycle crossing on the A4 and signalisation of the Beaumont Avenue Junction. Additional junction capacity improvements which include the pedestrian and cycle improvements of this junction and the other junctions discussed within this chapter would overall reduce traffic along this junction, allowing it to operate within capacity for both the 2031 Early Phases and 2041 All Phases.
- 7.521. VISSIM microsimulation assessments have also been undertaken to assess the wider network impacts (journey times) both with (to obtain a base rate) and without the Proposed Development (2031 Early Phases and 2041 All Phases). The journey times identified across the network in a limited number of locations with potential changes in journey times are summarised below:
- 2031 Early Phases: The level of change increases, with the maximum change journey times being 216 seconds on the Lillie Road eastbound and 205 seconds on Warwick Road northbound in the AM Peak. In the PM peak the maximum increase in delay is 197 seconds on Warwick Road.
 - 2041 All Phases Development: Journey times generally increase a small amount for the majority of cases. The largest increase is 275 seconds on Warwick Road in the AM peak, but this is prior to the consideration of mitigation.
- 7.522. While not being a requirement as the result of the junction capacity assessments, additional packages of junction improvements have been incorporated into the design of the development to reduce the potential for accidents and improve pedestrian and cycle accessibility (in addition to West Cromwell Road / North End Road Junction amendments detailed above). The potential junction improvements are as follows:
- North End Road/ Beaumont Avenue junction: the relocation of parking along the northern part of the carriageway into a fully inset bay with the footway provided behind

- A4 West Cromwell Road Pedestrian and Cycle Crossing: this would connect the site with Edith Villas, improving connectivity to/ from the north
- A4 West Cromwell Road / A3220 Warwick Road: improvements to widen the existing pedestrian crossing on the western arm to meet the desire (from the accident record and bus stop analysis) for users of the development to utilise the bus stop at the front of the Tesco Kensington Supermarket adjacent to this junction
- A3218 Old Brompton Road / A3220 Warwick Road: incorporating traffic signals into the northern and western pedestrian crossings, increasing the width of the pedestrian crossing and raising the pedestrian crossing on the left turn filter
- Warwick Road Corridor: the proposed two-way cycle track would reduce the three general traffic lanes into two

7.523. Junction capacity assessments indicate that all of the junctions will continue to operate within capacity with the proposed mitigation. All highway improvements are proposed to be secured through the appropriately worded S106 obligations.

7.524. The above highway improvements have also undertaken VISSIM assessments, which shows a general increase in journey times within the 2031 Early Phases Scenario and 2041 All Phases scenario. Nonetheless, the proposed amendments would create substantial public benefits, by increasing highway safety and improving the provision and safety of pedestrian and cycle routes. The proposed package of mitigation has been developed through discussions with the Transport Stakeholders and is anticipated to be sufficient. Further discussion would be welcomed with officers to agree the package of mitigation measures required.

7.525. The Proposed Development within the 2031 Early Phases and 2041 All Phases scenarios would support the prioritisation of pedestrian and cycling safety and permeability within and throughout the Site, while ensuring all junctions within the surrounding area operate within capacity, in accordance with the direction of the NPPF, London Policy GG5, T1, T2(c), T4, the Housing Design Standards LPG, RBKC Local Plan Policy C03(part), CT1, RBKC Draft Local Plan Policy T1, LBHF Policy T1 (part), T2, and Section 3.2 of the LBHF Earl's Court Placemaking Framework.

Taxi Strategy

7.526. The Proposed Development, while minimising vehicular routes through the Site has made allowance within its highway design and access strategy for the growing trend of taxi and private hire use, whilst maximising the pedestrian priority public realm throughout the Site by providing dedicated pick-up and drop-off locations for residents, workers and visitors.

Emergency Service Access

7.527. A swept path analysis has been undertaken for the Illustrative Masterplan to ensure that the Detailed and Outline Components can be appropriately designed to accommodate emergency service vehicles, including ambulances and fire services. Final details of emergency access routes are proposed to be required to be submitted at RMA stage and through the discharge of appropriately worded conditions.

Pedestrian and Cycle Network

- 7.528. A key benefit of the Proposed Development is that it will significantly increase the pedestrian and cycling permeability through the Site and open up north-south and east-west connectivity to the public for the first time.
- 7.529. The Proposed Development will prioritise pedestrians and cyclists through the public realm and will create new pedestrian and cycle routes and links to the surrounding streets, thereby improving connectivity and opening up the Site to integrate successfully with the wider area.
- 7.530. The Proposed Development will create a comprehensive network of pedestrian and cycle routes that will enable the Proposed Development to promote the Healthy Streets Approach by providing well-designed, high quality car free walking and cycling routes. These new street networks are inspired by the RBKC's and LBHF's historic street patterns, and are established with clear functions, as outlined within the various routes and networks contained within the Design Code.
- 7.531. Accessible routes have been integrated into the landscape as part of the inclusive approach and vision for the site. As detailed within the illustrative masterplan, the majority of the routes are level, with gentle slopes used for the majority of level changes, and lifts and stairs used where this is not possible.
- 7.532. A number of improvements to the pedestrian and cycle network within the surrounding junctions and road network have also been explored, which include the potential delivery of a contra-cycle flow on Warwick Road; integrating the scheme within the existing infrastructure; proposing new cycle lanes, dropped kerbs, tactile and footway widening, and conversions of footways and carriageways. Potential new pedestrian and cycle crossings, signalised junctions and raised crossings. More detail on pedestrian and cycle improvements is provided within the submitted Transport Assessment. These improvements will be secured via a S106 agreement.
- 7.533. As detailed within the aforementioned text, the proposed package of walking and cycling measures would increase journey times for vehicular traffic in the surrounding area. Therefore, a balance will need to be struck between safeguarding vehicular journey times and the improvement of pedestrian and cycle amenity. Further discussions will be held with the Transport Stakeholders post-application, proposals refined and appropriate mitigation secured.
- 7.534. The primary cycle and pedestrian access points have been fully considered for each Plot within the Detailed Component (Plot EC04, EC05, WB03, WB04, WB05), as detailed within the Transport Assessment. Boundary treatments have been fully considered to make a positive contribution to the streetscape, which include a range of seating, multifunctional landscapes, sensory planting, inherently playful environments, and tree planting, alongside other treatments contained within the separate RBKC and LBHF Detailed Components DAS (Volume 2 and Volume 3).

7.535. The delivery of the remaining cycle and pedestrian links and associated boundary treatments within the Early Phases and All Phases Developments will be phased appropriately, as part of future Reserved Matters applications.

7.536. The Proposed Development prioritises pedestrian and cycling throughout the site, which is supported by policy at all levels.

Cycle Parking

7.537. Residential cycle parking for the Outline and Detailed Components will be provided in line with London Plan standards. Cycle parking is proposed for the non-residential aspects, as agreed through pre-application discussions with officers. Details of the number of proposed cycle parking spaces is set out in Chapter 4 of this Statement and are discussed in further detail in the submitted Transport Assessment.

7.538. The final quantum of cycle parking delivered will depend on the final mix of uses that come forward. Ten percent of cycle parking spaces are proposed to be equipped with e-bike charging infrastructure. The long stay parking provision consists of a mixture of two tier, Sheffield Stand, wider Sheffield Stands and accessible Sheffield Stands. The short stay cycle parking will be located within the public realm and subject to the reserved matters application for the outline public realm.

Car Parking

7.539. Car parking for the Outline and Detailed Components will generally be provided in line with London Plan standards. The Proposed Development will be predominantly car free within the development to support active and sustainable modes of travel.

7.540. Blue badge parking equivalent to 3% of the total number of dwellings is proposed and will be leased rather than owned by the individual properties. These spaces will be on-Plot where possible, and where this is not possible on-street blue badge parking is proposed. The remaining 7% of parking will be identified through a Parking Design and Management Plan ("PDMP") submitted with the detailed application/reserved matters application relating to each Plot, but only identified for delivery should additional blue badge parking need be demonstrated. Car Club spaces will also be provided on-Site to mitigate demand for private car use and minimise vehicle movements within and around the Site.

7.541. The maximum car parking provision for the Proposed Development is set out in Chapter 4 of this Statement and discussed in further detail in the submitted Transport Assessment. The final quantum of car parking delivered will depend on the final mix of uses that come forward.

7.542. All parking spaces are proposed to be provided with electric vehicle charging points, and the parking bays are designed to meet the current Blue Badge standards.

7.543. Areas for servicing are provided at strategic locations across the site. Taxi and private hire pick-up/drop-off will also utilise a combination of the servicing bays alongside other dedicated areas to enable all units/ blocks to be served.

Travel Plan

- 7.544. The submitted Framework Travel Plan provides a framework for delivering the vision for sustainable travel in and around the Site and identifies the potential measures that may be introduced at the Site to promote active and sustainable modes such as walking, cycling and public transport.
- 7.545. Full Travel Plans have been prepared for the Detailed Proposals within the RBKC (EC05 and EC06) and the LBHF (WB03, WB04 and WB05). These Full Travel Plans identify appropriate mode share targets, the key measures that will be implemented to achieve these targets and establish the mechanisms to manage the Travel Plans and monitor their effectiveness for influencing travel choices.

Servicing and Deliveries

- 7.546. As mentioned above, vehicle access to the Site will predominately be restricted to servicing vehicles, blue badge parking, taxis and emergency vehicle access. A Servicing Strategy has therefore been prepared to reduce the total number of servicing and delivery trips generated by the site, reducing emissions associated with servicing and delivery trips and ensure vehicles can safely enter and egress the site.
- 7.547. The Retail Lane Use Strategy will seek to encourage on-Site fulfilment of services (such as click and collect, take-aways and grocery deliveries) so that the overall travel discharge of deliveries can be reduced when compared to receiving deliveries from off-Site.
- 7.548. The Residential Land Use Strategy will seek to reduce deliveries to the Site by offering a range of land uses that could fulfil the needs of the population. The strategy will further ensure the masterplan provides sufficient space to receive deliveries and offer localised services; on-site commercial logistics hub, facilities for the provision of services within the estate, and the provision of a booking app.
- 7.549. Within the RBKC Detailed Component, servicing is split between Warwick Crescent and the Northern Access Road. Day to day servicing such as amazon deliveries, takeaways grocery deliveries and post/e-commerce deliveries will take place via Warwick Crescent whilst larger deliveries and waste collection will take place via the Northern Access Road. Two loading bays are proposed, one to service EC05 and the other to service EC06, with an additional servicing bay along Warwick Crescent (subject to the final design of the public realm). Short-stay cycle provision will also be developed for delivery bikes.
- 7.550. Within the LBHF Detailed Proposals (WB04, WB04, WB05), vehicle access and servicing will be provided via a Service Access Road (SAR) which segregates the required vehicular movements away from pedestrians and cyclists. The SAR will connect to Lillie Road to the south and be controlled via an Automatic Number Plate Recognition (ANPR) security barrier. 6 Servicing Bays are provided within the LBHF Detailed Proposals.
- 7.551. With regard to waste servicing, the Illustrative Masterplan has been tracked to ensure that the roads within the site are appropriately designed to accommodate refuse collection

requirements. Servicing bays have been located, where appropriate, to facilitate collection. The final detail of the Outline Proposal will be secured through the RMA process.

Transport Summary

- 7.552. Having regard to the above sub-sections and submitted Transport Assessment, Travel Plans and Transport ES Chapter, the Proposed Development will comply with London Plan policies T2, T4, RBKC Local Plan and LBHF Local Plan policies in respect of the Proposed Development’s impact on the public transport network and highways. It will make a positive contribution to the local pedestrian and cycle network, provide blue badge car and cycle parking and strategies to encourage sustainable travel modes and manage servicing and deliveries. It should therefore be considered acceptable in this respect.
- 7.553. Overall, the effects of the Proposed Development on public transport, with the implementation of proposed mitigation (as secured in due course through appropriately worded S106 Agreement obligations), are acceptable in the Early and All Phases scenarios having regard to relevant planning policy. The Applicant will welcome the opportunity to discuss the proposed mitigation further with RBKC, LBHF and TfL officers during the Hybrid Applications determination period.

Environmental Considerations

Demolition and Construction

Relevant Policy Context

7.554. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
London Plan	<ul style="list-style-type: none"> - Policy D3(12): Optimising the site capacity through design-led approach - Policy E11(b): Skills and opportunities for all - Policy T7(j,k): Deliveries, servicing and construction - Policy S11(d): Improving air quality - Policy S17: Reducing waste and supporting the circular economy
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CE3(g,h): Waste - Policy CE5(d): Air Quality - Policy CE6: Noise and vibration
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy GB6(e): Air Quality - Policy GB7: Construction Management - Policy GB8: Noise and Vibration - Policy GB19(g,i): Waste Management
LBHF Local Plan	<ul style="list-style-type: none"> - Policy CC7: On-site Waste Management - Policy CC10: Air Quality - Policy CC13: Control of potentially polluting uses

	<ul style="list-style-type: none"> - Policy T7: Construction and demolition logistics
<p>LBHF Supplementary Planning Documents</p>	<ul style="list-style-type: none"> - Construction Code of Practice <ul style="list-style-type: none"> - Section 5: Hours of Work - Section 6: Noise and Vibration - Section 7: Air Quality - Dust, Particulates (PM10, PM2.5) and NOx - Section 9: Site Logistics, Access, and Deliveries - Section 10: Communications and Public Relations

7.555. This section should be read in conjunction with the submitted Circular Economy Statement, ES Demolition and Construction Chapter, Framework Construction Management Plan, Framework Construction Traffic Logistics Plan, EC05 and EC06 Construction Method Statement, and WB03, WB04 and WB05 Construction Management Statement.

Assessment

7.556. Planning policy at all levels requires development to mitigate environmental effects as a result of demolition and construction works.

7.557. At a local level, the LBHF Policy T7 requires all construction, demolition and major logistic activities within the borough to work with the council in developing the scope and impact of their operations, while the LBHF Construction Code of Practice (“CoCP”) provides advice to assist construction works, with further detail on hours of work, noise and vibration, air quality including dust, particles and Nox, non-road mobile machinery, site logistics, access and deliveries, and communications and public relations.

7.558. A Framework Construction Management Plan (“CMP”) has been submitted as part of the Hybrid Applications, which details relevant stakeholder engagement, the anticipated demolition and construction programme, a number of required works to enable commencement and completion of the proposed development, and the management of construction hours which includes information such as the proposed hours of work.

7.559. The Framework Construction Environment Management Plan (“CEMP”), which is contained within the submitted CMP, sets out a further range of additional measures proposed to prevent negative environmental effects to the general amenities by existing surrounding occupiers. Mitigation includes a plot-specific detailed Site Waste Management Plan (“SWMP”), an Arboricultural Method Statement (“AMS”), Water Management Plan (“WMP”), archaeological Written Scheme of Investigation (“WSI”), contamination measures within a detailed CEMP, a more detailed framework Construction Transport and Logistics Plan (“CTLP”), and the preparation of a Dust Management Plan (“DMP”).

7.560. Additional works include Environmental Risk Assessments for demolition and construction impacts on noise, dust and vibration. This would inform mitigation measures within task-specific method statements, used in construction staff training and toolbox talks. Community liaison and communication would also take place for planned demolition and construction

works to reduce the likelihood of adverse effects for a range of environmental effects, including noise and vibration.

- 7.561. A detailed CMP would be produced by each appointed Principal Contractor prior to works commencing on a Development Plot. Alongside the above mitigation measures, the CMP would include measures to control impacts/ provide required mitigation measures for demolition and construction lighting, the prevention of water contamination, the embedded ecology mitigation, management measures on the built heritage, townscape and visual impacts.
- 7.562. On this basis, the proposed development has considered the demolition and construction impacts of the proposed development, in accordance with the relevant criteria contained within London Plan Policy T7, S11, S17, RBKC Local Plan Policy CE6, CE5, CE6, RBKC Draft Policy GB6, GB7, GB8, GB19, and LBHF Local Plan Policy CC7, CC10, CC13 and T7, and the LBHG Construction Code of Practice.

Archaeology

Relevant Policy Context

- 7.563. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 16: Conserving and enhancing the historic environment - Para. 200 notes that where a site includes/ has the potential to include heritage assets with archaeological interest, developers are required to submit a desk based assessment, and where necessary, a field evaluation.
London Plan	<ul style="list-style-type: none"> - Policy HC1: Heritage conservation and growth
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CL4: Heritage Assets – Listed Buildings, Scheduled Ancient Monuments and Archaeology
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy CD5: Scheduled Ancient Monuments and Archaeology
LBHF Local Plan	<ul style="list-style-type: none"> - Policy DC8(g,l): Heritage and conservation

- 7.564. This section should be read in conjunction with the submitted ES Chapter 6 and the Archaeological Desk Based Assessment (“DBA”).

Assessment

- 7.565. In order to assess whether the Proposed Development would impact below-ground heritage assets, an Archaeological DBA has been undertaken alongside three phases of archaeological field investigations. To ensure that the Proposed Development does not give

rise to significant residual effects on buried heritage assets, the proposed mitigation includes an Archaeological WSI, which accords with the requirements of relevant planning policy at all levels.

7.566. The investigation work has included a geoarchaeological evaluation, two archaeological watching briefs in 2014-16, and a watching brief in 2016. Although the review of historic maps and archaeological studies confirmed that the study area has low potential for prehistoric occupation and Roman and Saxon settlements, the following potential impacts on buried remains were found:

- High potential for agricultural post-medieval remains such as ditches and plough soils, along with structural remains including wall footings and foundations, all containing low heritage importance
- Moderate-high potential for paleoenvironmental remains within alluvial deposits associated with the former Counter's Creek (east of the site), with low-medium heritage significance
- Moderate potential for settlement remains along North End Road (western edge of the site), including cellars, wells and pits, which contain moderate heritage significance. Agricultural ditches or plough soils within this location contain low heritage significance
- Low-moderate potential for C19th century infrastructure, which include the buried remains of the Kensington Canal and the later railway infrastructure which is of low-medium significance depending on the level of preservation

7.567. The assessment of effects found that a number of demolition and construction effects, including the preliminary site works including demolition and breaking out existing foundation slabs; pile probing and obstruction removal; ground remediation; construction of basements; insertion of new piled foundations, pile caps and ground beams and well as the installation of the ambient loop system; and landscaping and other shallow groundworks are likely to have an impact upon a number of remains within the Early Phases and All Phases Development.

7.568. Within the Early Phases development (including the Detailed Components), demolition and construction effects are likely to impact upon a number of post-medieval and paleoenvironmental remains, resulting in a range of permanent, long-term moderate, minor and negligible adverse effects.

7.569. Within the All Phases development, demolition and construction effects are likely to impact upon a number of post-medieval, later-medieval and paleoenvironmental remains, resulting in a range of permanent, long-term moderate, minor and negligible adverse effects.

7.570. It is considered that the adverse effects on buried heritage assets for both the Early Phases and All Phases development could be offset and reduced to an acceptable level by the implementation of an archaeological WSI, which includes:

- Archaeological investigation and palaeoenvironmental sampling, with dissemination at an appropriate level to increase knowledge and appreciation of the buried heritage assets
- A programme of research and education about the industrial heritage of the Site for public benefit

7.571. Overall, with the implementation of archaeological investigation, the demolition and construction stages of the Proposed Development would not give rise to significant residual effects on buried heritage assets. On this basis the development is in full accordance with the NPPF, Policy HC1(d) of the London Plan, CL4(g) of the RBKC Adopted Local Plan, CD5(b) of the RBKC Draft Local Plan, and Policy DC8(g,l) of the LBHF Local Plan.

Health

Relevant Policy Context

7.572. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	- Chapter 8: Promoting healthy and safe communities - Para. 97 provides guidance to help achieve healthy, inclusive and safe places, including planning positively for a range of local services, and ensuring an integrated approach to considering the location of the housing and economic uses, and the community facilities and services.
London Plan	- Policy GG3: Creating a healthy city
RBKC Draft Local Plan	- Policy SA2(g,v): Earl's Court Exhibition Centre

7.573. This section should be read in conjunction with the ES Human Health Chapter.

Assessment

7.574. A human health assessment has been undertaken to understand the human health effects resulting from the demolition and construction stage and the completed development stage of the Proposed Development, in accordance with Policy at all levels.

7.575. At a national level, Chapter 8 of the NPPF outlines and provides guidance on how planning policies should promote healthy and safe communities. Policy GG3 of the London Plan looks to improve Londoner's health and reduce health inequality. Part D encourages boroughs to assess the potential impacts of the proposals on the mental health and wellbeing of communities through the use of Health Impact Assessments.

- 7.576. At a local level, Policy SA2 (g) requires the Proposed Development to improve health, social and cultural well-being for all sections of the community.
- 7.577. The submitted ES Human Health Chapter has assessed the Proposed Development against areas of potential impacts to human health which comprise health-related behaviours such as diet and nutrition, and the social environment, such as open space transport, community identity and culture, and social participation.
- 7.578. The report concludes that the Early Phases and All Phases demolition and construction effects will have beneficial effects to:
- Identity, culture, resilience and influence - designing the development within the historic, social and cultural context of the site, undertaking extensive consultation with the community through the masterplanning and design process, and ensuring existing off-site and future on-site residents are able to contact the Proposed Development to resolve grievances
 - Social participation, interaction and support – due to the range of programmes undertaken by ECDC to reach out to and support children, young people, adolescents and groups across west London, and ECDC's extensive engagement with the local community
- 7.579. The Early Phases and All Phases demolition and construction effects would also result in a number of temporary adverse, but not significant effects to human health, such as air quality, noise and vibration, climate change mitigation and adaption and transport modes.
- 7.580. The Early Phases and All Phases completed development would likely give rise to the following beneficial effects:
- *Climate change, mitigation and adaption:* due to the Passivhaus design, providing a high level of occupant comfort using very little energy heating and cooling. Additional benefits include the open space and tree cover during high temperatures
 - *Diet and nutrition:* through the indicative restaurant offer which has been designed to be accessible to a wide population, alongside other potential initiatives to provide support for food security and a demonstration kitchen for health eating within community facilities through the PRIP
 - *Community Safety:* through the preparation of a security strategy following the principles of Secured by Design criteria, considering aspects such as the management of pedestrian and vehicle access movement, security across the site, business continuity and disaster recovery
 - *Open space, leisure and play:* the provision of a range of open spaces and play spaces within an area of open space deficit, designed to maximise biodiversity and connectivity within the design of the public realm
 - *Community identity, culture, resilience and influence:* designing the development within the historic, social and cultural context of the site, undertaking extensive consultation with the community through the masterplanning and design process,

and ensuring existing off-site and future on-site residents are able to contact the Proposed Development to resolve grievances

- *Social Participation, Interaction and Support*: due to the range of programmes undertaken by ECDC to reach out to and support children, young people, adolescents and groups across west London, and ECDC's extensive engagement with the local community
- *Transport modes, access and connections*: the enablement of active lifestyles would contribute to reducing morbidity associated with sedentary lifestyles and urban environments characterised by urban transport. The inclusive design creates a vehicle-free public realm, a walkable residential neighbourhood and connect to existing cycle routes to encourage active travel. The width of cycle routes have taken disabled cyclists into account

7.581. The completed development would result in no significant effects on health and social care which would largely be mitigated through financial contributions and/or on-site provision. Due to the phased nature of the development, the NHS and local government stakeholders are also able to plan for the population requirements.

7.582. The Proposed Development provides a number of health benefits, in accordance with the NPPF, Policy GG3 of the London Plan, and Policy SA2(g) of the Draft RBKC Local Plan.

Air Quality

Relevant Policy Context

7.583. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	- Para. 192 requires air quality to be improved or impacts mitigated so far as possible. -
London Plan	- Policy E7(d): Industrial intensification, co-location and substitution - Policy S11: Improving air quality - Housing Design Standards LPG - Section A1.11 and A1.12: the requirements for Environmental Impact Assessments and Air Quality Positive - Housing SPG - Section 22: Air Quality Neutral
RBKC Adopted Local Plan	- Policy CE5: Air Quality
RBKC Draft Local Plan	- Policy GB6: Air Quality

LBHF Local Plan	<ul style="list-style-type: none"> - Policy CC10: Air Quality - Policy CC13: Control of potentially polluting uses - LBHF Planning Guidance - Key Principle AQ4: Air Quality Neutral requirements
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7.584. This section should be read in conjunction with the ES Air Quality Chapter and Air Quality Positive Statement.

Assessment

7.585. An assessment of the potential impacts during the demolition and construction traffic phase has been carried out. This has shown that during this phase of the proposed Early Phases and All Phases Development, releases of dust and PM10 is likely to occur during demolition and construction activities. Through site management and the implementation of recommended mitigation measures (such as a stakeholder communications strategy, dust management plan, effective site management alongside other measures), the impact of dust releases may be effectively mitigated and the resultant impacts of demolition and construction dust effects would not be significant.

7.586. Dispersion modelling using AMS-Roads has been carried out to assess the impact of road traffic emissions during the construction and operational phases of the proposed Early Years and All Phases Development on local air quality. This assessment also included emissions from non-road emission sources, including the WLL railway and MOPAC energy centre flues. The change in NO₂, PH₁₀, PM_{2.5} concentrations at sensitive human health receptors due to Early Phase and All Phase demolition and construction stage traffic have concluded that the effects would not be significant.

7.587. Concentrations of NO₂, PM₁₀ and PM_{2.5} have also been predicted for future on-site sensitive receptor locations introduced during the Early Phases. The predicted concentrations, which include contributions from road traffic, the WLL, MOPAC energy centre and background concentrations, would be well below the relevant air quality objectives at all future on-site receptor locations during the Early Phases and All Phases demolition and construction stage and completed development stage. The Early Phases and All Phases Site is therefore considered acceptable for the proposed uses during the Early Phases and All Phases demolition and construction stage and completed development stage.

7.588. Concentrations of NO₂, PM₁₀ and PM_{2.5} as a result of testing of the emergency generators would be below NAQOs due to the limited operating hours and would therefore not be significant during the completed development stage for All Phases and Early Phases.

7.589. The change in NO_x concentrations, nitrogen deposition and acid deposition due to Early Phases and All Phases completed development traffic at sensitive ecological receptors (Brompton Cemetery) is not considered significant.

- 7.590. The Early Phases and All Phases Development will be air quality neutral in relation to transport emissions and building emissions. As detailed within the Air Quality Positive Statement, a number of measures will be adopted to enable the development to be Air Quality Positive in relation to the Proposed Development's design, building emissions, transport emissions and innovation/ futureproofing methods, including:
- Better design and reducing exposure: the design of the site's walking strategy to reduce onsite exposure to vehicle exhaust emissions, the landscaped entrances to the Proposed Development, MWHR ventilation strategy and increased set back distance of sensitive receptors and public open space from pollution sources which reduce exposure to air pollution
 - Building emissions: minimising on-site combustion to reduce building emissions, the use of hydrogenated vegetable oil as a secondary power supply to reduce standby generator emissions, and the proposed energy strategy which ensures no on-site emissions associated with heating, hot water, and cooling across the Proposed Development
 - Transport emissions: the Use of a CEMP to reduce potential impacts from construction activity, a Construction Access Strategy to reduce construction vehicle emissions, a Walking Strategy and cycling and micro-mobility strategy to increase active travel, a public transport strategy to reduce private car use, a car parking strategy with reduced private car use, a servicing strategy and waste strategy with reduced HDV movements, and a vehicular and emergency access strategy that ensures compliant access but helps to create a predominately vehicle free public realm
 - Innovation and futureproofing: space for the use of a hydrogenated vegetable oil fuelled generator has been installed within each plot as a secondary power supply. During the detailed plot design, if an alternative technology is proven suitable for life safety systems it would be considered
- 7.591. The Early Phases and All Phases demolition construction effects and completed development assessment confirms there would be no need for additional mitigation.
- 7.592. The demolition and construction stage of the Early Phases and All Phases scenarios, and the completed Early Phase and All Phase Development would not give rise to significant effects on air quality at sensitive receptors. The above mentioned measures embedded in the Sites design and operation would allow the Proposed Development to be Air Quality Positive.
- 7.593. Therefore, the Proposed Development complies with London Plan Policy SI1 and E7, the Housing Design Standards LPG (2023) and SPG (2016), RBKC Policy CE5, Draft RBKC Policy GB6, LBHF CC10, the LBHF Planning guidance (2018) and the NPPF (2023).

Noise and Vibration

Relevant Policy Context

7.594. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Para.191 required development to mitigate potential adverse impacts resulting from noise -
London Plan	<ul style="list-style-type: none"> - Policy D13: Agent of Change - Policy D14: Noise - - Housing Design Standards LPG <ul style="list-style-type: none"> - Section C5: External noise and soundproofing - Housing SPG - Section 30: noise
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CE6: Noise and vibration
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy GB8: Noise and vibration
LBHF Local Plan	<ul style="list-style-type: none"> - Policy CC11: Noise - Policy CC13: Control of potentially polluting uses - Policy HO11: Detailed residential standards - LBHF Planning Guidance <ul style="list-style-type: none"> - Key Principle NN4: Noise generating development

7.595. This section is to be read in conjunction with the ES Noise and Vibration Chapter.

Assessment

7.596. The Noise and Vibration Assessment has considered the different stages of the construction programme and railway-induced vibration for both the Early Phases Development and All Phases Development, to identify the potential for effects at sensitive receptors in close proximity to the works.

7.597. With regards to the Early Phases, the assessment of noise and vibration effects at residential properties adjacent to works conclude that, with mitigation measures in place(e.g. best practice measures such as agreed hours of work, shutting down machinery when not in use, and using solid maintained hoarding which would be implemented through the CEMP, alongside other matters included within the ES) noise from the continued operation of LBD, building services noise, commercial activity noise, railway vibration and

re-radiated ground-borne noise are not expected to result in any significant adverse effects with residential uses within either the Detailed Component or Outline Component.

- 7.598. Within the Detailed Component of the All Phases Development, environmental noise and vibration risk remains the same as within the Early Phases Development. The Outline Component of the All Phases Development contains areas of higher risk within Development Zones located adjacent to West Cromwell Road and the WILL.
- 7.599. To avoid significant effects due to the occasional operation of TfL’s Road to Rail Vehicle (RRV) access point during the daytime, it is recommended that balconies are not provided on the overlooking facades of the Outline Component Proposed Plots unless it can be demonstrated that through good acoustic design, the outdoor noise level within these balconies can be reduced to below SOAEL or that quieter amenity areas are available nearby.
- 7.600. Overall, subject to the consideration of noise and vibration during the detailed design stage for each sensitive receptor building, no significant effects are expected to arise for the residential occupants of the All Phases due to existing or proposed sources of noise or vibration.
- 7.601. Significant adverse effects identified during the demolition works will be temporary in nature and will cease with the completion of the Proposed Development.
- 7.602. To control the impact of noise during all phases of the construction of the Proposed Development, contractors will ensure that construction works are carried out in accordance with best practicable means to ensure that noise and vibration levels are kept as low as practicably possible, and that the local residents are kept up to date with the planned works.
- 7.603. The new homes provided in the Proposed Development will incorporate measures such as glazing and ventilation to ensure that the required internal noise levels can be met.
- 7.604. The Proposed Development would not cause unacceptable noise disturbance and should be considered acceptable in the context of London Plan Policy SD13 and D14, the London Housing Design Standards SPG and LPG, RBKC Policy CE6 and RBKC Draft Policy GB8, LBHF Local Plan Policy CC11, CC13, HO4, and the LBHF Planning Guidance.

Ecology and Trees

Relevant Policy Context

- 7.605. Alongside the planning policies contained under the ‘Design’ heading, the following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	- Chapter 15: Conserve and enhance the historic environment

London Plan	<ul style="list-style-type: none"> - Policy G6: Biodiversity and access to nature - Policy G7: Trees and woodlands - Housing Design Standards LPG - Section A4.2: Public open space, biodiversity and urban greening - Housing SPG <ul style="list-style-type: none"> - Section 40: Ecology
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CE4: Biodiversity
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy GB16: Parks, Gardens and Open Space - Policy GB17: Biodiversity - Policy GB18: Trees and Ecology
RBKC Supplementary Planning Document	<ul style="list-style-type: none"> - Earl's Court Opportunity Area Placemaking Framework <ul style="list-style-type: none"> - Priority 1.2(a,b): Working with natural systems and the inherited landscape
LBHF Local Plan	<ul style="list-style-type: none"> - Policy OS5: Greening of the borough - LBHF Planning Guidance <ul style="list-style-type: none"> - Key Principle BD4: Retention of Biodiversity - Key Principle BD5: Invasive plant species

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

Assessment

7.607. The 2023 and 2024 Preliminary Ecological Assessments (“PEA”) that have been carried out found a number of on-Site habitats with local importance, which included Neutral Grassland (G36) and Broadleaved trees and line of trees (W1g6). The Built Up areas and Gardens (U1), Sparsely segregated Land (S), Mixed Scrub (H3h), Bramble Scrub (H3d), Modified Grassland (G4), Non-Native Ornamental Hedgerows (H2b) and Standing Water (R1a6) are recorded as being of Site Importance. All remaining habitats are recorded as negligible importance (not significant).

7.608. During the demolition and construction works for the Early Phases and All Phases, a number of embedded mitigation measures (such as root protection measures, CEMP measures and controls to address impacts associated with surface water, contamination, dust and noise monitoring and waste management) will be implemented to ensure effects on habitats Phases will not be significant.

7.609. Within the completed development stage, the Early Phases and All Phases development would introduce a variety of different habitat types through a series of landscaped spaces, squares, public realm and communal residential amenity terraces. It is anticipated that detailed landscape design for each phase would be secured with planning conditions including biodiverse roof strategies and habitat management plans, designed by ecologists, to ensure maximum biodiversity gain. Further design interventions and principles that will

be implemented to minimise impacts on ecological features include achieving a minimum of 10% BNG and Urban Greening Factor of 0.4, a landscape-led approach and significant biodiverse green infrastructure.

Biodiversity Net Gain ("BNG")

- 7.610. A BNG Assessment (using the DEFRA's Biodiversity Metric) is submitted in support of the Hybrid Applications to assesses how the Proposed Development will impact biodiversity, as well as identifying opportunities for net gain. As detailed within the BNG Assessment, the Early Phases Development Scenario would result in an +85.88% (+8.63 Biodiversity Units) net gain for area-based habitats. Although there are zero baseline units for hedgerows, the development proposes an increase in hedgerow units of 0.52 (0.31km) which equates to a net gain:
- Within RBKC, the Early Phases Development Scenario would result in an +177.77% net gain (+7.10 Biodiversity Units) and an increase in hedgerow units of 0.05 HU (0.03km) which equates to a net gain.
 - Within LBHF, the Early Phases Development Scenario would result in an +35.97% net gain (+1.46 Biodiversity Units) and an increase in hedgerow units of 0.47 HU (0.28km) which equates to a net gain.
- 7.611. The All Phases Development Scenario would result in an +116% (+18.44 Biodiversity Units) net gain for area-based habitats and a +306.7% net gain (0.52% Hedgerow Units) for hedgerows.
- Within RBKC, the All Phases Development Scenario would result in an +119.07% (+7.40 Biodiversity Units) net gain for area-based habitats and an increase in hedgerow units of 0.05 HU (0.03km) which equates to a net gain.
 - Within LBHF, the All Phases Development Scenario would result in an 114.79% (+11.08 Biodiversity Units) net gain for area-based habitats and a 277.17% net gain (0.47 Hedgerow Units) for hedgerows.
- 7.612. The above findings demonstrate that, overall, the Proposed Development will deliver substantial BNG well in excess of the 10% required by legislation and committed to within the ES.
- 7.613. The Proposed Development will also commit to appropriate monitoring, management and maintenance of retained and created wildlife habitats, alongside other measures contained within the ES. Once planting is established, the completed development stage will have a significant beneficial local level effect on habitats during both the Early Phases and All Phases development.
- 7.614. Barn Elms Wetland Centre is the closest Statutory Designation to the Site, located approximately 2.5km to the west. Although 17 Sites of Importance for Nature Conservation ("SINCs") have been identified within a 17km distance, only the WLL SINCs are partially located within the Site. Brompton Cemetery is located 20 metres to the south of the Site.

- 7.615. Although there is potential for the Early Phases and All Phases demolition and construction effects to impact the SINC's, this would be managed through industry good practice measures and controls to limit direct loss, noise, vibration, visual disturbance, habitat degradation and pollution, as part of the CEMP through a suitably worded planning condition. By adhering to the CEMP, the Early Phases and All Phases would maintain the ecological importance and integrity of the designated sites and result in not significant effects.
- 7.616. Decking over the WLL SINC's would result in the loss of habitat, disturbance of species and reduction in lighting levels during the demolition and construction Early and All Phases development. As discussed in the Design Code, the decking over would be designed in collaboration with a suitably qualified ecologist to ensure biodiversity gain and foraging bat movement is maintained, resulting in not significant effects during the demolition and construction phase.
- 7.617. Within the completed development, the substantial landscaping will seek to enhance the WLL SINC's, resulting in Significant Beneficial ecological effects at up to the Local Level and Minor Beneficial effects in EIA terms within both the Early Phases and All Phases Development.
- 7.618. The demolition and construction effects within the Early Phases and All Phases development would have a temporary, not significant effect on a number of notable and/or protected species:
- Invertebrates with local importance
 - Bats, birds and hedgehogs with site level importance
 - amphibians, reptiles, badger and flora species with negligible importance
- 7.619. Potential impacts during the demolition and construction stage would be managed through industry good practice measures and controls, forming the basis of a CEMP.
- 7.620. With the implementation of embedded mitigation, as set out in the ES Chapter, the completed development for Early Phases and All Phases would result in Beneficial effects on invertebrates, birds and bats.
- 7.621. Although the provision of new habitat has the potential to be used by hedgehogs and other mammals, it is unlikely that it would cause a change in the numbers of individuals or success of populations using the habitats. Therefore, no significant effects on other mammals would be expected.

Trees

- 7.622. The submitted Arboricultural Statement and appended Tree Survey has found a total of 158 trees on the Site, of which 103 are located within the area of the Early Phases and 55 on LBD land in the All Phases development scenario. A total of 8 Category A trees were found, along with 86 Category B, 60 Category C and 4 Category U trees.

- 7.623. ECDC, on behalf of the Applicant, and the design team will seek the retention of as many high-quality trees as possible as the detailed design comes forward.
- 7.624. To enable the Early Phases development scenario, the removal of 23 Retention Category B, C and U trees, would be required, alongside pruning works to retained trees. This equates to 4 trees within the RBKC Early Phases and 19 within the LBHF Early Phases. The Proposed Development would include provision for approximately 867 trees within the Early Phases based on assumptions drawn from the Illustrative Masterplan.
- 7.625. To enable the All Phases development scenario, the removal of 24 Retention Category B, C and U trees, would be required, alongside pruning works to additional trees. The proposed development would include a minimum of 1,000 trees within the All Phases and approximately 1,487 trees based on assumptions drawn from the Illustrative Masterplan.
- 7.626. A number of tree root protection areas will be disturbed during the demolition and construction phases of development. To mitigate these impacts as far as possible, an Arboricultural Method Statement (“AMS”) is proposed to be secured through an appropriately worked planning condition.
- 7.627. The Proposed Development will deliver a comprehensive landscaping strategy in line with the Design Code, delivering substantial BNG and incorporating tree planting that will result in a significant net increase in trees across the Site in the Early and All Phases scenarios. The Proposed Development accords with relevant paragraphs of the NPPF, London Plan Policies G5, G6 and G7, RBKC Local Plan Policy CE4, draft RBKC Local Plan Policies GB16, GB17 and GB18 and LBHF Local Plan Policy OS5.

Ground Conditions

Relevant Policy Context

- 7.628. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Para.180 notes that remediating and mitigating contaminated land contributes to the enhancement of the natural and local environment. - Para. 189 requires ground conditions and risks arising from land instability and contamination is taken into account. Land should not be considered as contaminated after remediation.
London Plan	<ul style="list-style-type: none"> - Policy SD1: Opportunity Areas - Policy D7: Industrial Intensification, co-location and substitution
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CE7: Contaminated land

RBKC Draft Local Plan	- Policy GB20: Contaminated land
LBHF Local Plan	- Policy CC9: Contaminated land

Assessment

- 7.629. Based on a review of desk-based information, potential sources of on-site contamination have been identified as Made Ground associated with former land uses, railway land including LBD, tanks and fuel storage, and electrical substations. Potential off-site sources of contamination include railway land, electrical substations and historical land uses including laundries, a distillery, engineering works and brick fields.
- 7.630. Previous investigations at the site have identified localised areas of hydrocarbon contamination in the north and west of the Site associated with the LBD, and evidence of Asbestos Containing Materials in the eastern part.
- 7.631. The geology underlying the site comprises Made Ground which is underlain by the Kempton Park Gravel Member and the London Clay Formation. The Lambeth Group, Thanet Formation and Chalk Group underlie the London Clay Formation at depth.
- 7.632. The Site is located within an area deemed to be at High risk of unexploded ordinance (“UXO”). During demolition and construction effects, there is the potential for ground conditions to impact demolition and construction workers. These effects would be mitigated through the adoption a CEMP, further ground investigation, as well as the implementation of a Detailed Unexploded Threat Assessment.
- 7.633. Potential effects to controlled waters would be mitigated through the implementation of a foundation works risk assessment to assess the risks to controlled waters from piling activities. Mitigation measures comprising the use of clean drilling techniques and pressure testing would be employed during the construction of thermal loop systems.
- 7.634. Overall, demolition on the existing Site and construction of the Proposed Development would not give rise to significant effects on the identified receptors, assuming that the mitigation measures are implemented. On this basis, Proposed Development is in accordance with London Plan Policy SD1 and E7, RBKC Policy CE7, Draft RBKC Policy GB20, and LBHF Policy CC9.

Water Resources

Relevant Policy Context

- 7.635. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 14: Meeting the challenge of climate change, flooding and coastal change - Para. 173 requires authorities to ensure that planning applications will not increase flood risk elsewhere - Para.159 requires inappropriate development at areas of flooding risk to be avoided by directing development away from areas at highest risk, and where necessary in such areas, ensuring the development will be made safe for its lifetime without increasing flood risk elsewhere. - Para.162 explains the ai of the Sequential Test - Para.167 notes that when determining planning applications, it should be ensured that flood risk is not increased elsewhere. - Para.169 recommends that major development should incorporate sustainable drainage systems unless there is clear evidence this would be inappropriate.
London Plan	<ul style="list-style-type: none"> - Policy GG6: Increasing efficiency and resilience - SI2: Flood risk management - SI3: Sustainable drainage - SI5: Water infrastructure - D11(c): Safety, security and resilience to emergency - Housing Design Standards LPG <ul style="list-style-type: none"> - Section A.18: Response to context and the climate emergency - Housing SPG <ul style="list-style-type: none"> - Standard 37: Water
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CL7: Basements - Policy CE2: Flooding
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy CD10: Basements - Policy SA2: Earl’s Court Exhibition Centre - Policy GB11: Flood risk - GB12: Sustainable Drainage - GB15: Green Infrastructure
LBHF Local Plan	<ul style="list-style-type: none"> - Policy DC11: Basements and Lightwells - Policy CC3: Minimising Flood Risk and Reducing Water Use - Policy CC4: Minimising surface water run-off with sustainable drainage systems - LBHF Planning Guidance <ul style="list-style-type: none"> - Key principle SuD1: SuDs in major development - Key Principle SuD2: Sustainable drainage strategy - Key Principle SuD5: SuDs and flat roofs - Key Principle SuD6: Hardstanding surfaces

Assessment

- 7.636. This section should be read in conjunction with the submitted ES Chapter 14, Flood Risk Assessment (“FRA”) and Drainage Strategy, Integrated Water Management Strategy (“IWMS”) and Drainage Statements for Plots EC05 and WC06, and Plots WB03, WB04 and WB05, prepared by WSP.

Assessment of the Proposed Development

- 7.637. The Proposed Development is located within areas of Flood Zones 1, 2 and 3. However, the Site is located within an area that is protected from flooding by the River Thames Tidal defences and river walls. As such, the long-term flood risk (which takes into account the effect of any flood defences and predicted effects of climate change) for fluvial and tidal flooding is low.
- 7.638. While it is highly unlikely, flooding may still occur in an overtopping event or failure of flood defences. On this basis, in line with the Thames Estuary 2100 Plan (TE2100), the Thames Tidal Upriver Breach Inundation Model has calculated the Maximum Likely Water Level (MLWL) in the present day scenario of 5.01m AOD, and the future (2100, incorporating the impacts of Climate Change) scenario of 5.92m AOD.
- 7.639. As the Thames River Wall is currently at 5.54m AOD, it is not at risk from a present day overtopping event. The site would not be at risk from a future 2100 overtopping event on the basis that the Thames River Wall levels are raised in line with the TE2100 requirements. Although flooding is predicted within the future 2100 breach event, this is limited to localised areas of the site that fall below +3.03m AOD (the West London Railway Line and District Line Cuttings, and localised low-lying areas along the north-eastern site boundary and adjacent to West Kensington Station). The site is therefore at a Low risk of fluvial and tidal flooding risk overall.
- 7.640. The same low-lying areas are also shown to be at risk of surface water flooding, however most of the Site is at very low risk of surface water flooding.
- 7.641. There are large areas at risk of surface water and sewer flooding off-site, but the risk would be managed following the commissioning of the Tideway Tunnel (planned for 2025) together with the continued implementation of sustainable surface water drainage measures (detailed below) to improve resilience within the study area, making sewer and surface water flooding incidences less frequent.
- 7.642. Based on the RBKC and LBHF FRAs, the Site is classed as having very high susceptibility to groundwater flooding, as groundwater levels are generally shallow relative to the ground surface across the site. On this basis, the local groundwater flooding risk is low. Based on the underlying geological conditions, there is potential for groundwater impacts if groundwater levels are identified above basement formation levels. Mitigation to prevent groundwater flooding (if deemed necessary through detailed design) would include measures for additional groundwater drainage and/or formation of granular pathways to introduced flow barriers. This would ensure that groundwater flow conditions are only altered locally to mitigate risk of groundwater flooding.

- 7.643. Overall, most flood risk within the Site boundary relates to the WLL and District Line cuttings. The management of flood risk along the tracks is the responsibility of those who own and operate these assets (NR and LUL) and the mitigation of these flood risks is beyond the scope and responsibilities associated with the re-development of the Site. Nonetheless, proposals to re-develop the site will not exacerbate this risk.

Sequential and Exception Test

- 7.644. As stated in the NPPF, a sequential risk-based approach to determine the suitability of land for development in flood risk areas should be applied at all stages of the planning process giving precedence to low flood risk areas wherever possible.
- 7.645. In accordance with the NPPF and associated Gov.uk Flood Risk and Coastal Planning Practice Guidance (2022) (Table 2: Flood Risk Vulnerability Classification) the Proposed Development includes residential housing which is classed as 'More Vulnerable'. Due to the site's partial location within Flood Zone 2 and 3a with respect to tidal flooding, the development requires a Sequential Test and Exceptions Test to confirm the Proposed Development is in line with the requirements of the NPPF.
- 7.646. On the basis that Sequential Tests have already been carried out for the Site by both the RBKC and LBHF, and the type of development on the Site is concluded to be sequentially acceptable, in accordance with EA guidelines an additional Sequential Test has not been carried out. The Proposed Development would be delivered in a manner that remains safe to residents and users, and that improves surface water and sewer flood risk in the study area.
- 7.647. With regard to the Exceptions Test, the redevelopment of a large brownfield site provides numerous sustainability benefits to the community which outweigh the flood risk, as detailed within Chapter 6 of the submitted FRA and Outline Drainage Strategy, and within the submitted Sustainability Strategy. The FRA has been prepared to summarise how the Proposed Development has been planned to ensure the safety of residents and users in relation to tidal and fluvial flood risk, without increasing flood risk elsewhere. The report evidences that the proposed strategies for the All Phases and Early Phases scenario would demonstrate a significant net reduction in surface and combined water discharge to the Thames Water sewer network and would be protected against surface water flooding for the critical rainfall events. Overall, the proposed development would make a positive contribution to reducing flood risk and is therefore deemed to pass the Exception Test.

Basements

- 7.648. A single level of basements is proposed under a number of the Development Zones within the Proposed Development, generally for 'back-of-house' floor space including plant rooms and car parking. No habitable residential floor space is proposed at basement level.
- 7.649. Basements abutting railway cuttings would be designed and constructed to prevent water ingress from predicted flooding within these cuttings in the future 2100 breach event. With the exception of Development Zone X, proposed basements 'back-on' to the railway cuttings

to ensure no flow path between floodwater in the cuttings and internal basement areas. In Development Zone X, if it is not practicable to design basements to prevent ingress of floodwater, they would be designed and constructed for flood resilience.

- 7.650. The risk of groundwater flooding within the Early Phases and All Phases is considered low on the basis that proposed basements FFLs are designed to sit above groundwater levels, and groundwater levels sitting deeper than existing and proposed ground levels.
- 7.651. Where required under RBKC and LBHF policy, proposed basements will be subject to the preparation and approval of a Basement Impact Assessment to assess their impact on flooding, drainage and groundwater conditions. Mitigation measures such as the provision of non-return valves would be embedded into the design and construction of proposed basements if deemed necessary through detailed design to ensure accordance with RBKC Local Plan Policy CL7, RBKC Draft Policy CD10 and LBHF Local Plan Policy CL11.

Surface Water Drainage Strategy

- 7.652. The site-wide surface water drainage strategy has been developed to align with the SuDS hierarchy, with a focus on re-use of rainwater and infiltration features to minimise the volume and rate of surface water run-off from the proposed development. Soakaways would be supplemented by green infrastructure and soft SuDS elements including permeable paving, swales, rain gardens and recessed areas of landscaping in order to manage surface water close to source and to provide inception losses and water quality improvements prior to storage within attenuation or infiltration features. These features will help improve water quality, enhance biodiversity, urban greening, amenity and recreation. Any residual flows would be discharged into the local combined sewer network.

Detailed Components

- 7.653. The RBKC surface water drainage strategy for the Detailed Component (EC05 and EC06) has been developed to comply with the site-wide drainage strategy and the sustainable drainage hierarchy. The strategy focuses on the re-use of rainwater and infiltration to ground, supplemented by on-plot attenuation such that any residual surface water run-off to the lower sewer network that contains less than greenfield runoff rates and volumes.
- 7.654. The LBHF Detailed Design Drainage Strategy for the Detailed Component Site (WB03, WB04 and WB05) also promotes the use of rainwater harvesting, infiltration during low intensity events and green roofs in line with the top three tiers of the hierarchy. The phase-wide network will overflow to the adjacent combined water sewer in Aisgill Avenue when the inflow exceeds the infiltration capability. Flows are restricted to greenfield runoffs.

Early Phases

- 7.655. The implementation of the surface water drainage strategies for the Early Phases would restrict surface water run-off from the Site to below greenfield rates and volumes, and result in a significant net reduction in combined peak discharge rate into the TW sewer system, thereby reducing off-site flood risks.

All Phases

- 7.656. Within the All Phases development scenario, localised land raising would impact the predicted movement of water during the 2100 breach event, however a breach in the River Thames flood defences is considered unlikely, with any small increase in land raising having no impact on existing flood risk classifications. The implementation of the surface water drainage strategies would reduce surface water runoff to below greenfield rates and volumes, while the resulting risks to off-site flood risk would be offset by the significant net reduction in combined peak discharge rates from the Site, and the reduction in surface water and sewer flood risk this would provide.
- 7.657. Additional flood risk mitigation measures include the implementation of flood resilient construction techniques, electrical plants to sit above +3.04m AOD within areas of flooding, alongside other methods.
- 7.658. Overall, surface water flooding within the Early Phases and All Phases is considered very low on the basis that the ODS has been developed to accommodate the 1 in 100 year storm event (plus 40% allowance for climate change). Site levels and overland flow routes would be defined through subsequent design stages.

Foul Drainage

- 7.659. The historical private drainage runs located within the Site will be retained and re-used where practicable, but for the most part would require removal/ abandonment to enable construction.
- 7.660. Following pre-application discussions with Thames Water, due to capacity concerns with the local combined sewer network within Beaumont Avenue and Aisgill Avenue, it is proposed to connect to the Thames Water network downstream of these locations, at North End Road, and further south along Aisgill Avenue where there are no capacity concerns.

Detailed Components

- 7.661. The foul water drainage strategy for the RBKC Detailed Component has been developed to convey all foul flows from EC05 and EC06 to the local sewer network via the proposed sitewide foul water drainage network.
- 7.662. The foul water drainage strategy for the LBHF Detailed Component has been developed to convey all foul flows from WB03, WB04 and WB05 via gravity to a new below ground foul water network proposed below the service road. Flows would be transferred to the public combined sewer to the south of the development.

Early Phases and All Phases

- 7.663. Within the Early Phases and All Phases, it is anticipated that foul flows from these Development Zones would be pumped to proposed on-site foul sewers prior to discharge to the TW sewer network. The anticipated outfall locations are summarised within Chapter 8 of the FRA.
- 7.664. Risk to the Early Phases and All Phases from sewer flooding is considered low, on the basis that any increase in foul water flows as a result of the development would be offset by the

reduction in surface water discharge rates, Thames Water advising that there is available capacity for the proposed flows within the proposed locations, and non-return valves being specified on proposed building outfalls in the event of a sewer surcharging to prevent it from backing up into internal basement areas.

- 7.665. Off-site flood risk would also decrease within the study area, and flood risk to third-party rail assets within the Site boundary would also see a slight decrease.

Demolition and Construction Effects

- 7.666. The demolition and construction effects of flood risk for the Early Phases and All Phases have also been assessed, as detailed below:

- As the baseline conditions of the site (large areas of made ground drained through a combination of infiltration and pumping to the local sewer network) are comparable to what would typically be expected at a construction site, the effect of demolition and construction effect on surface water run-off rates would not be significant. Groundwater pumping may be required for basement construction, but likely effects would be proportionally mitigated through the CEMP
- The temporary surface water drainage that would be provided through demolition and construction would be of a similar nature and offer a comparable degree of surface water flood protection to sub-surface and at-grade rail infrastructure as the existing on-site drainage, therefore effects to these assets in terms of water resources and flood risk would not be significant
- Potable water and foul water demand is not likely to be significant compared to historic site uses. The phased implementation of the surface water drainage strategy would result in an improved impact on local drainage infrastructure
- During demolition there would be potential for impacts to groundwater receptors, which would be mitigated against via additional ground investigations in advance of commencing works on-site (secured via a suitably worded condition), alongside a Foundations Works Risk Assessment and Basement Impact Assessment within future detailed applications. The implementation of a CEMP would also mitigate potential effects

- 7.667. Overall, the demolition and construction of the Early Phases and All Phases would not give rise to significant effects on water resource and identified receptors on the basis that the proposed embedded mitigation measures are implemented.

Completed Development Effects

- 7.668. The completed development effects of the Early Phases and All Phases have been assessed, as detailed below:

- With regards to flood risk, only a very localised area of the site is at risk of shallow flooding in the predicted 2100 breach event. To manage these residual risks, minimum building threshold and external levels have been defined where necessary. Land raising is only proposed for the purposes of providing an accessible Site (to span over the WLL) and is not proposed within areas at risk of flooding in the 2100

breach event. Therefore, the change to off-site residual flood levels as a result of the Proposed Development would not be significant

- The Early Phases and All Phases would have a significant beneficial effect to the risk of sewer and surface water flooding due to the implementation of the surface water drainage strategy. The strategy would which restrict surface water run-off from the Site to below greenfield rates and volumes, and result in a significant net reduction in combined peak discharge rate into the TW sewer system, thereby reducing off-site flood risks
- Potable water demand that would be generated by both the Early Phases and All Phases would be managed sustainably, via rainwater harvesting, grey-water recycling, and through water-efficient fittings. To agree an approach that minimises the risk of upstream reinforcement for the water network and allows on-site infrastructure to be sized effectively for both the Early Phases and All Phases, the water strategy have been developed through consultation with Thames Water. The effect of the increase in potable water supply would not be significant given that Tames Water is the regulated utility provider that would own and operate the water supply infrastructure that serves the early phases site
- Although there is potential for the Early Phases and All Phases to impact shallow ground water receptors affecting groundwater quantity and quality within the superficial deposit aquifers, potential effects relating to the introduction of groundwater flow barriers, infiltration and impact to groundwater quality would be mitigated through the implementation of CEMP and further ground investigations. Overall, the effect of the proposed surface water drainage strategy on groundwater receptors is not considered significant due to much of the existing site draining through infiltration and the prevailing low groundwater gradients across the Site

7.669. Overall, the completed Early Phases and All Phases would not give rise to significant adverse effects on water resource and identified receptors assuming that the above proposed mitigations are implemented. The implementation of the sustainable surface water drainage strategies would result in significant cumulative beneficial effects.

Flood Risk Mitigation and Water Management

7.670. Additional flood risk mitigation measures include the implementation of flood resilient construction techniques, electrical plants to sit above +3.04m AOD within areas of flooding, estate management of Development Zones subscribing to the 'FloodLine Warning Direct' service offered by the Environment Agency, and through Basement Impact Assessments to be undertaken where required

Water Management

7.671. Careful consideration has been given to identifying suitable water management measures that can work in a combined sitewide approach. If fully implemented at all stages of the proposed development's delivery, the proposed IWMS will result in:

- The irrigation of all public realm landscape utilising rainfall and / or grey water from the Site

- Significantly reductions in rainwater run-off from Site compared to existing conditions
- All rainfall would be attenuated on-Site and used or infiltrated to ground to reduce run-off rates
- Capture, recycle and re-use of water will be achieved where possible. 40 days of rainwater and/or greywater storage would be held on-Site for irrigation
- 100% of non-potable water would be used for the Cascades across the year, derived from harvested rainwater and greywater. 60 days of water storage would ensure continuity during periods of low rainfall
- Implementation Sustainable Urban Drainage Systems (SUDS) to slow water run-off, infiltrating >60% to the ground in a typical storm event
- Surface water run-off will improve upon Greenfield rates
- Climate resilient species would be selected in the planting strategy to minimise water demands for irrigation
- Buildings will be made water efficient, minimising potable demand through the use of a combination of low flow fittings, rainwater harvesting and where appropriate greywater recycling

7.672. Additional considerations during the detailed design includes an aspiration to limit water usage to 80l/p/d minimum in buildings, the consideration of vacuum flush toilets in non-residential buildings, the consideration of blue roads, and exploring further opportunities within the detailed design to reduce the surface water discharge into the combined sewer network.

7.673. The Proposed Development satisfies the requirements of the NPPF, London Plan Policy GG6, SI12, S13, S15, RBKC Local Plan Policy CE2, RBKC Draft Policy GB11 and GB12, and LBHF Local Plan Policy CC4.

Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill

Relevant Policy Context

7.674. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	- Para. 129 notes that a flexible approach should be taken towards daylight and sunlight where it would inhibit making effective use of the site, subject to the resulting scheme providing acceptable living standards.
London Plan	- Policy D6: Housing quality and standards - Policy D9: Tall buildings - - Housing Design Standards LPG

	<ul style="list-style-type: none"> - Section A1.8: consideration for daylight and sunlight received by the existing residents in surrounding homes - Section A1.9: requirements for a daylight and sunlight assessment - Section C4: aspect, orientation, daylight and sunlight considerations <ul style="list-style-type: none"> - Housing SPG <ul style="list-style-type: none"> - Part 32: daylight and sunlight
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CL5: Living conditions
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy HO3: Community Housing
LBHF Local Plan	<ul style="list-style-type: none"> - Policy HO4: Housing quality and density - HO0: Student accommodation

Assessment

- 7.675. Impacts on external (i.e. in relation to properties neighbouring the Site) and internal (i.e. within the Proposed Development) daylight and sunlight levels have been assessed, along with overshadowing, solar glare and light spill, within the Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill ES Chapter, Contextual Daylight, Sunlight and Overshadowing Report (which is appended to the ES Chapter) and Internal Daylight, Sunlight and Overshadowing Report submitted as part of the Hybrid Applications.
- 7.676. London Plan Policy D6, RBKC Local Plan Policy CL5 and LBHF Local Plan Policy HO4 direct the design of new development to take account of the amenity of neighbours and ensure sufficient daylight and sunlight to new, existing and neighbouring buildings (or where they are already substandard, no material worsening of conditions). London Plan Policy D6 also states that daylight and sunlight levels should be appropriate for a site's context, while also balancing considerations such as avoiding overheating, minimising overshadowing and maximising useability of outdoor space.
- 7.677. NPPF para. 129 states that development should make optimal use of the potential of each site, which is an approach supported by London Plan Policies GG2 and D3 and RBKC Draft Local Plan HO3 and LBHF Local Plan Policy HO4. LPAs should, when considering applications, particularly for development in accessible Opportunity Area locations such as the Site, take a flexible approach to applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site. The Mayor's Housing SPG is also clear that "*an appropriate degree of flexibility needs to be applied when using BRE guidance to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially... large sites and accessible locations*" (para. 1.3.45). This should take into account local circumstance, the context of the Site and the need to optimise its capacity.
- 7.678. Assessment work has taken account of the Site's context and the amenity of occupants of buildings and open spaces within and outside the Site, which has informed the design

evolution of the Proposed Development. Building massing, orientation and location of open spaces have been refined to ensure that the impacts on the surrounding area are minimised and future occupants and areas of open space are provided with the best levels of light possible while optimising the redevelopment of the Site.

External Daylight, Sunlight, Overshadowing and Solar Glare

- 7.679. The standard format of reporting of effects in relation to external daylight and sunlight effects in ES Daylight-related chapters is a-contextual, based on effects as a result of the Proposed Development compared to the existing baseline state of the Site. This means it would not take account of the wider context in relation to the Site in relation to its:
- being an underused and partially cleared state (i.e. a temporary and unrepresentative state for an Opportunity Area);
 - former use of part of the Site, which included large scale Exhibition Centre buildings and the daylight levels that neighbours have previously experienced before large parts of the Site were cleared;
 - Opportunity Area designation and site allocations for high density development to help meet the requirements of strategic planning policy objectives; or
 - previously approved planning permissions for high density redevelopment, which include accepted reductions to neighbour daylight and sunlight levels.
- 7.680. It is fundamental to the understanding of the nature of daylight and sunlight effects for a development such as the Proposed Development on its neighbours to consider those effects in the context of the particular circumstances of the proposal.
- 7.681. The 'industry standard' benchmarking of effects against BRE guidance, which was prepared to consider effects in lower density suburban settings, rather than high density, Opportunity Area locations in central London, is also not readily applicable to proposals of the type and scale of the Proposed Development.
- 7.682. Decision takers must take account of both the direction of planning policy to apply BRE standards and recommendations flexibly and the Site's context when considering the nature of daylight and sunlight effects on neighbours as a result of the Proposed Development.
- 7.683. GIA has prepared the submitted Daylight, Sunlight, Overshadowing and Solar Glare assessments for the ES Chapter. Alongside the identification of effects, a contextual analysis and assessment has been undertaken, which is reported within the body of the ES Chapter and set out in more detail within the appended Contextual Daylight, Sunlight and Overshadowing Report to determine the acceptability of retained levels of light at neighbouring properties taking account of the Site's context.
- 7.684. This assessment, which has been discussed with RBKC and LBHF officers and their appointed specialist consultants and agreed in principle as an approach through pre-

application engagement, is based on methodology which has been accepted in relation to multiple high density developments on brownfield urban sites across London. It includes two stages of assessment:

- Stage 1 is a calculation to confirm whether an impact is noticeable by applying the national numerical assessments in the BRE Guidelines
- Stage 2 is a matter of judgement, and it is necessary to consider whether a noticeable impact (as determined by the BRE assessments) is acceptable in the particular context of the case

7.685. To inform the second stage of assessment and to determine the acceptability of retained levels of light, alternative target criteria have been set based on four relevant factors (where applicable at specific properties). These include:

1. a comparison to the approved 2013 OPPs; or
2. if relevant, a comparison to the 'Pre-Existing Baseline' when the Earls Court Exhibition Centres were still in place. This is to understand if the retained levels of daylight and sunlight associated with the Proposed Development are materially different from those previously approved or experienced;
3. As recommended by the Mayor's SPG, the retained daylight has been compared to other "*broadly comparable residential typologies*" which in this case relates to other high density, large scale developments in London, as well as examples of the relationship of existing properties with one another in terms of daylight levels elsewhere in RBKC and LBHF; and
4. As per the BRE Guidelines, the sensitivity of the loss has also been considered against factors such as existing obstructions (such as balconies), room use and size.

7.686. This enables the acceptability of the impact found in Stage 2 to be reviewed in relation to the following considerations:

- Are the retained levels materially different from those previously accepted in the 2013 OPPs (i.e. 2013 OPPs v Proposed Development)?
- Are the retained levels materially different from what was historically experienced (i.e. Pre-Existing Exhibition Centre Buildings baseline vs Proposed Development)?
- Are the retained levels in line with other broadly comparable residential typologies, as recommended by the Mayor's Housing SPG?
- Are there other relevant factors relating to the specific building typology and context which make a window and/or room less sensitive?

- 7.687. It is through this process that a contextual daylight assessment is undertaken based on an alternative target criteria for the levels of daylight that are retained in neighbouring properties have been set. These provide a more representative understanding of the nature of effects the Proposed Development is expected to have on neighbouring properties compared to the current underused and partially cleared state of the Site.
- 7.688. The assessments primarily focus on the All Phases scenario and would still be valid for the Early Phases scenario as all properties that meet the alternative target criteria in the All Phases scenario would meet them for the Early Phases scenario or perform better due to the reduced amount of redevelopment.

External Daylight Findings

- 7.689. As is noted above, the Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill ES Chapter assesses the potential effects of Detailed and Outline Components in relation to neighbouring properties' access to daylight and sunlight.
- 7.690. The ES Chapter finds that there would be no significant daylight effects to the majority of properties assessed (238 out of 438, approximately 65%). The remaining 155 properties would experience a significant effect when the Proposed Development is assessed against the existing baseline and applying maximum parameter building envelopes to the Outline Components (representing a 'worst case' scenario).
- 7.691. The contextual assessment, which is incorporated into the ES Chapter and re-provided with additional background and assessment information in the Contextual Report appended to the ES Chapter, sets these findings in context.
- 7.692. Of the 155 properties that would experience a significant daylight effect, there are 97 properties that would meet the alternative target criteria and a further 36 properties that would substantially (i.e. save for a minority of windows on a property) meet the alternative target criteria and the effects are therefore considered to be acceptable when taking account of the contextual approach set out above. The remaining 22 properties (less than 5% of all those assessed), which generally relate to small groups of flats and houses within the West Kensington and Gibbs Green estates in LBHF and around Eardley Crescent and Philbeach Gardens in RBKC, would not meet the alternative target criteria, but this is generally a result of existing architecture (e.g. self-obstruction or restrictive neighbouring buildings) and the impacts are acceptable when considered in context.

External Sunlight Findings

- 7.693. A total of 272 properties have been assessed in relation to effects on levels of sunlight. There would be no significant effects on 199 properties (approximately 73%). Of the 73 properties that would experience a significant effect, 65 would meet or substantially meet the alternative target criteria. The remaining 8 properties (less than 3% of all those assessed), which are located around the crescent of Philbeach Gardens, would not meet the alternative target criteria. As for the daylight assessments, the lower levels of light at

these properties are primarily due to the proximity of the properties to the site and existing obstructions to sunlight reaching the windows.

- 7.694. The assessments demonstrate that 95% of the 438 properties assessed around the Site for daylight effects and 98% of the 272 properties assessed for sunlight effects would experience similar levels of daylight when assessed contextually against the approved 2013 OPPs and other streetscapes in RBKC and LBHF, with only a small proportion of buildings experiencing lower levels of daylight, which is generally due to other contextual factors that are particular to the property, such as proximity to the Site boundary, existing obstructions, or projecting elevations or overhangs which affect the daylight levels reaching individual windows.

External Overshadowing Findings

- 7.695. 400 amenity areas such as public spaces and gardens have been assessed for overshadowing effects as a result of the Proposed Development. There would be no significant effect on 374 of those areas (over 93%). Of the 26 areas that would experience significant effects, 21 would meet or substantially meet the alternative target criteria. The remaining 5 areas (just over 1% of all those assessed) located around Eardley Crescent and Philbeach Gardens in RBKC and one property on Aisgill Avenue would not meet the alternative target criteria. This is generally due to the orientation of existing gardens as well as existing obstructions such as projecting building elements or fences which restrict the sunlight to those spaces.
- 7.696. Overall, the Contextual Report concludes that the daylight, sunlight and overshadowing values that will be achieved on completion of the Proposed Development are in keeping with other developments that have been considered acceptable and are similar to the Proposed Development in terms of their scale and nature, or location within a dense urban context. The values are also similar to levels approved by RBKC and LBHF for the 2013 OPPs and those experienced in established streets in RBKC and LBHF that are sought after places to live.
- 7.697. A considered approach has been taken to the massing of the Proposed Development, having regard to its potential effects on daylight, sunlight and overshadowing in relation to neighbouring properties. The submitted assessments demonstrate that, overall, the Proposed Development will have an acceptable effect on neighbouring properties when taking account of context and the alternative target criteria set out in the submitted assessments, and are acceptable having regard to the direction of planning policy at all levels to optimise the redevelopment of the Site and the range of public benefits the Proposed Development will deliver, which are set out in Section 9 of this Statement.

Solar Glare and Light Spill

- 7.698. The submitted Solar Glare assessment assesses effects on 21 locations at surrounding road junctions and approaches up to 500m from the Site from which the Proposed Development would be visible within a road user's light of sight that is considered sensitive to solar glare, having regard to the sun's path during the day. 26 locations along the District

and West London railway lines have been assessed for the Early Phases scenario and 32 for the All Phases scenario where train drivers would potentially have a view of the Proposed Development.

- 7.699. The Early and All Phases scenario would result in no significant effects, with negligible or minor adverse effects identified for road users and train drivers due to the limited anticipated exposure to solar glare in terms of distance from the Site and the length of exposure within each view. Solar glare effects are therefore acceptable, with no additional mitigation proposed.
- 7.700. The Light Spill assessment assesses effects on residential and other properties within 30m of proposed on-site office uses that could be sensitive to light spillage.
- 7.701. There are no sensitive receptors close enough to development in the Early Phases scenario and no significant effects in the All Phases scenario. Light spill effects are therefore acceptable, with no additional mitigation proposed.

Internal Daylight, Sunlight and Overshadowing

Outline Components

- 7.702. The submitted Internal Daylight, Sunlight and Overshadowing Report has undertaken an assessment of proposed building elevations for the Detailed Components. For the Outline Components, maximum parameter building envelopes only are proposed at this stage, with no façade design proposed for approval as they will be subject to future design development and RMA applications. The assessment is therefore based on the Illustrative Masterplan (for Development Zones where residential or PBSA floorspace may be delivered), as this provides an indication of the effects of the Proposed Development at this stage. Proposed areas of public realm and open spaces within the Site are also assessed in relation to potential for sunlight and overshadowing.
- 7.703. For the Outline Components, the results of the façade assessment find that the daylight potential for illustrative building elevations are generally good and are typical of a high density urban development such as the Proposed Development. Lower levels of daylight are found predominately on the lowest floors and the report provides a number of design measures that may be employed, in line with the Design Code, to optimise daylight ingress at the RMA stage. This is the case for Early and All Phases scenarios.
- 7.704. Levels of sunlight reaching facades in the Outline Components is generally excellent, with the majority of facades with a southerly aspect experiencing overall levels of sunlight exposure in line with or exceeding BRE recommendations. As may be expected in a dense urban development of this nature, sunlight at lower levels or elevations with a northerly aspect are lower. This is the case in Early and All Phases scenarios.
- 7.705. In relation to sunlight and overshadowing in the public realm in Early and All Phases scenarios, the majority of the public realm will be well sunlit, particularly in June around the equinox, with only small areas of the public realm experiencing less than two hours of

sunlight during the day, which are in a minority of areas across the Site and will provide areas of relief during periods of hot weather. All main areas of public open space (The Table, The Cascades, Aisgill Gardens, Lillie Sidings Square, Warwick Square and West Brompton Square) perform very well for access to sunlight. Amenity spaces within the Detailed Components also experience good levels of sunlight, with some reduced levels of sunlight experienced during winter months, which is to be expected and is when the amenity areas will be less well used. Areas of public open spaces that experience higher levels of sunlight will be in close proximity and easily accessible from those Plots in the event occupants wish to access direct sunlight.

- 7.706. Overall, in accordance with relevant planning policy, and applying the flexibility that LPAs are directed to take into account by the NPPF and Mayor's Housing SPG, the Proposed Development will deliver residential and PBSA units and areas of outdoor space that will be acceptable in terms of their access to daylight and sunlight, with additional design measures proposed to optimise the performance of the Outline Components in future as they reach the detailed design stage and come forward for RMA.

Detailed Components

- 7.707. For the Detailed Components, as set out in the 'Amenity within the site: Internal Daylight Report', prepared by GIA, all habitable rooms within WB04, WB05 and EC05 and EC06 have been technically assessed for Median Daylight Illuminance (MDI) and sunlight exposure. WB03 provides PBSA, which is generally considered less sensitive in relation to internal light levels owing to the transient nature of its occupancy pattern. Nonetheless, all proposed rooms have been assessed for daylight and sunlight.
- 7.708. In addition, all outdoor areas of public or communal amenity provided within these buildings have been tested for overshadowing through the Sun Hours on Ground metric.
- 7.709. As part of the design-led approach testing and reviewing of numerous design options to help ensure occupants had the greatest access to natural light possible and it is considered that the design of LBHF Detailed Component been optimised for daylight and sunlight. As typical of any scheme of this size and density, the design responds to a number of constraints. In particular, a balance has been sought between the daylight performance, the provision of private external amenity in the form of balconies, and overheating considerations.
- 7.710. In relation to daylight for WB03, WB04 and WB05, the overall performance of the scheme is good and 1429 (72%) of the 1982 rooms assessed will achieve the minimum levels of Median Daylight Illuminance (MDI) recommended within the UK National Annex for residential buildings. This figure considers the higher recommendation of 200 lux for larger combined living/kitchen/dining rooms (LKDs) and studios, but it would increase to 1546 (78%) should 150 lux (suggested for living rooms) be considered acceptable as has been historically common in urban high-density developments. Where rooms, in WB03 have been found to fall short of recommendations students will still be able to enjoy good levels of natural light by using the shared spaces provided within their floor or within the wider building.

- 7.711. Sunlight access across the Detailed Component is also good, with 74% (344 out of 462) of the residential units seeing the recommended solar exposure.
- 7.712. The LBHF Detailed Component provides several outdoor amenity spaces with the most prominent being the podium area connecting WB03 and WB04 and the courtyard space between WB05-T1 and WB05-T2. These areas exceed the recommend solar exposure and will be well sunlit. There are three smaller terraces within WB04 which are predominantly north-facing and so see lower levels of sunlight than those recommended on the equinox, but these see good levels of sunlight during the summer months and residents have access to the larger areas that meet the guidance.
- 7.713. The LBHF Detailed Component has been optimised for daylight, sunlight and overshadowing. The levels of daylight and sunlight within the proposed units are generally good considering the buildings' typology, density and setting. The scheme will also provide future occupants and users of the Site with access to good levels of sunlight in the amenity areas proposed. The above is in accordance with NPPF para. 129c relating to the effective use of land, paragraphs 1.3.45 and 1.3.46 of the Mayor's Housing SPG, as well as LBHF Local Plan Policy DC2.
- 7.714. In relation to daylight for EC05 and EC06 the overall performance within EC05 and EC06 is good. When adopting the 150 lux target suggested for living rooms also for multi-use rooms including a kitchen (i.e. LKDs and studios), as typically done in dense urban environments, 658 (72%) of the 909 rooms assessed would achieve or exceed the minimum levels. When considering the higher 200 lux target, then 612 (67%) would achieve the minimum levels of Median Daylight Illuminance (MDI) recommended within the UK National Annex for residential buildings.
- 7.715. It should be noted that 100% of all homes being dual aspect within EC06 and 87% being dual-aspect within EC05 (in accordance with the definition outlined in the DAS Volume 2: RBKC Detailed Component, 100% of all M4(2) homes being oversized in excess of NDSS minimums, the M4(3) wheelchair homes are larger than minimum space areas and all homes benefit from external amenity space with the exception of 14 Homes in EC05 which have internalised amenity and are larger than NDSS minimum for M4(2) Homes.
- 7.716. Sunlight access is adequate considering the context, with 50% (155 out of 310) of the residential Homes seeing the recommended solar exposure.
- 7.717. A variety of outdoor amenity spaces are provided as part of EC05 and EC06 where future occupants will be able to enjoy either a sunlit or more shaded space depending on their requirements. The sunlight performance of the open spaces is in line with expectations for high-density locations, with a large terrace serving EC05 significantly exceeding the guidance and the southern area of Warwick Walk also receiving sunlight on the equinox.
- 7.718. The RBKC Detailed Component has been optimised for daylight, sunlight and overshadowing. The levels of daylight and sunlight within the proposed units are generally good considering the buildings' typology, density and setting. The scheme will also provide future occupants and users of the Site with access to good levels of sunlight in the amenity

areas proposed. The above is in accordance with NPPF para. 129c relating to the effective use of land, paragraphs 1.3.45 and 1.3.46 of the Mayor’s Housing SPG, as well as RBKC Local Plan Policy CL5 (as saved draft RBKC Local Plan Policy CD8).

Wind

Relevant Policy Context

7.719. The following planning policies and guidance are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
London Plan	<ul style="list-style-type: none"> - Policy D8 (j): Public realm - Policy D9 (3(a)): Considerations of wind conditions - Policy D11 (c): Safety, security and resilience to emergency - Housing Design Standards LPG <ul style="list-style-type: none"> - Section Point A1.9: Requirement of a microclimate/ wind assessment for tall buildings
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CL5: Living conditions
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy CD8: Living Conditions
LBHF Local Plan	<ul style="list-style-type: none"> - Policy DC3: Tall Buildings

Assessment

7.720. This section should be read in conjunction with Volume 1, Chapter 16, Wind of the ES.

7.721. London Plan Policy D8, Part J, requires new public realm proposals to ensure that appropriate microclimate considerations including wind. Policy D9 requires consideration to be had to environmental impact including wind. RBKC Local Plan Policy CL5 (Saved Policy CD8 in the draft RBKC Local Plan) requires development to ensure good living conditions for new, existing and neighbouring buildings and LBHF Local Plan Policy DC3 seeks to avoid detrimental impacts on the local environment as a result of tall buildings.

7.722. The Proposed Development has been tested using a 1:400 scale model of the existing Site and the study area, along with a scale model of the Proposed Development to assess potential wind microclimate effects.

7.723. The ES Chapter finds that the Proposed Development is expected to provide appropriate conditions across the Site in Early Phases and All Phases scenarios when taking account of recommended mitigation measures and with the inclusion of appropriately worded planning conditions to secure necessary measures. For the Outline Proposals, these measures will be incorporated as necessary during the detailed design and wind testing

process as part of applications for RMA. For the Detailed Proposals, mitigation measures are set out in the Wind Microclimate Chapter of ES Volume 1.

7.724. With the mitigation measures in place, the Proposed Development will ensure a safe environment and good living conditions are provided, in accordance with relevant planning policy.

Climate

Relevant Policy Context

7.725. The following planning policies are of most relevance to this section:

Policy Document	Policy or Para. Reference / Title
NPPF	<ul style="list-style-type: none"> - Chapter 2: Achieving sustainable development - Chapter 8: Promoting healthy and safe communities - Chapter 9: Promoting sustainable transport - Chapter 12: Achieving well-designed places - Chapter 14: Meeting the challenge of climate change, flooding and coastal change
London Plan	<ul style="list-style-type: none"> - Policy SI2: Minimising greenhouse gas emissions - SI4: Managing heat risk - SI7: Reducing waste - SI12: Flood risk management - SI13: Sustainable drainage
RBKC Adopted Local Plan	<ul style="list-style-type: none"> - Policy CE1: Climate change - Policy CE2: Flooding
RBKC Draft Local Plan	<ul style="list-style-type: none"> - Policy GB2: Circular Economy - Policy GB3: Whole Life-Cycle Assessment - Policy GB4: Energy and Net Zero Carbon - Policy GB5: Overheating - Policy GB12: Sustainable Drainage
LBHF Local Plan	<ul style="list-style-type: none"> - Policy CC1: Reducing carbon dioxide emissions - Policy CC2: Ensuring sustainable design and construction - Policy CC3: Minimising flood risk and reducing water waste - Policy CC4: Minimising surface water run-off with sustainable drainage systems

Assessment

7.726. This section should be read in conjunction with Volume 1, Chapter 17, Climate of the Environmental Statement.

7.727. Chapter 14 of the NPPF relates to meeting the challenge of climate change and new development should be planned for in ways that avoid increased vulnerability to the range

of impacts arising from climate change and can help to reduce greenhouse gas emissions, such as through its location, orientation and design.

7.728. The EIA Regulations require an assessment of the likely significant effects of a project on climate and vice versa. A climate assessment in the context of EIA comprises of the following three separate assessments:

- Climate Change Resilience (CCR) Assessment: considers the vulnerability of the Proposed Development to extreme weather and projected climate change during the demolition and construction stage and completed development stage
- In-Combination Climate Impacts (ICCI) Assessment: considers how extreme weather and projected climate change could have an additive effect on impacts identified by other technical disciplines as a result of the Proposed Development during the demolition and construction stage and completed development stage
- GHG Emissions Assessment: considers the potential for significant effects to arise from the Proposed Development in terms of GHG emissions during the demolition and construction stage and completed development stage

7.729. Consideration of the resilience of the Proposed Development is important to ensure that the development is fit-for-purpose when the impacts of climate change are taken into account.

7.730. The CCR assessment has reviewed the potential vulnerability of the All Phases to extreme weather and projected climate change. Taking into account embedded mitigation measures, the All Phases would result in a permanent Not Significant effect on climate and identified receptors.

7.731. The ICCI assessment has reviewed the potential for climate change to exacerbate the effects from other environmental disciplines on identified receptors. However, taking into account embedded mitigation measures, the All Phases would result in a Not Significant effect on climate and identified receptors.

7.732. The GHG assessment concludes that once the All Phases is operational, GHG emissions would be generated primarily from the use of the Proposed Development and from its maintenance. The provisional estimate of emissions from the operation of the All Phases Proposed Development over the 60 year design life (including end of life) are 1,208,832 tCO₂e.

7.733. When comparing the All Phases GHG emissions against the existing Site condition, it is considered that the completed Proposed Development would result in an adverse effect on climate change and identified receptors; however, this effect would not be significant in relation to climate change.

7.734. WLCAs have been proposed as an enhancement measure to be undertaken for Outline Components of the Proposed Development throughout design development of the Proposed Development, where further opportunities for reduction in GHG emissions will be identified.

- 7.735. Overall, the completed Proposed Development would not result in a significant permanent effect on climate and identified receptors.

8. Community Infrastructure Levy and Section 106 Agreement

Community Infrastructure Levy (“CIL”)

- 8.1 The Proposed Development will generate a significant amount of CIL liability in accordance with the Community Infrastructure Levy Regulations 2010 (as amended). The majority of the liability will be Mayoral CIL under the Mayor of London CIL Charging Schedule 2 (“MCIL2”). Most of the Site falls within borough CIL Charging Zones identified in the RBKC and LBHF CIL Charging Schedules (which came into effect in 2015) that are subject to a nil charge rate for land within the ECWKOA. The only exception to this is a section of Development Zone A in RBKC, which is within CIL Charge Zone D.
- 8.2 The Proposed Development is a phased development, as reflected by the development phasing plans included in the Indicative Phasing Strategy document submitted for information with the Hybrid Applications. It is also proposed to be phased for the purposes of CIL liability calculation and payment, which has been agreed with officers in principle during pre-application discussions. Further discussions will be held in relation to the approach to CIL-related phasing of the Proposed Development during the determination period for the Hybrid Applications.
- 8.3 An appropriately worded planning condition, to be attached to planning permissions for both Hybrid Planning Applications, is sought requiring compliance with phasing plans to be submitted for approval, along with a mechanism in the planning condition to allow the approved phasing plans to be updated from time to time as required to reflect changes to the phasing of development, and to add in further detail regarding the phasing of individual Development Plots in the Outline Component as they come forward following the approval of Reserved Matters.
- 8.4 It is proposed that the planning condition and approved phasing plans referred to above will include two separate sets of phasing plans which govern respectively:
- Phasing of the construction of the Proposed Development (“Development Phases”); and
 - Phasing relevant to the calculation and payment of CIL liability (“CIL Phases”). The CIL Phases will be more granular, or ‘layered’, CIL Phases than the Development Phases that reflect different packages of works that will come forward as the Proposed Development is delivered. For instance, CIL Phases are expected to include: Advanced Infrastructure or Enabling Works and Demolition Works phases, which will not create floorspace or generate CIL liability, and Construction (Below

Ground and Above Ground) phases, which would create floorspace and generate CIL liability. These will be defined as separate CIL Phases on CIL Phasing Plans that will be submitted for approval to discharge the aforementioned planning condition.

- 8.5 Each CIL Phase described on the approved CIL Phasing plans shall constitute a separate Chargeable Development authorised by planning permission granted in relation to the Hybrid Applications for the purposes of the Community Infrastructure Levy Regulations 2010 (as amended).
- 8.6 CIL abatement and any other relevant relief (such as social housing relief) will also be sought for CIL liability paid to date in relation to the implemented 2013 OPPs in LBHF and RBKC.

Planning Obligations

- 8.7 Section 106 of the Town and Country Planning Act 1990 allows the entering into of an obligation, by agreement or unilaterally, between the LPA (or LPAs) and any person interested in the land for the purposes of:
- restricting the development or use of the land in any specified way;
 - requiring specified operations or activities to be carried out in, on, under or over the land;
 - requiring the land to be used in any specified way; or
 - requiring a sum or sums to be paid to the LPA (or, in a case where section 2E of the 1990 Act applies, to the GLA) on a specified date or dates or periodically.
- 8.8 Regulation 122 of the Community Infrastructure Levy Regulations (2010) states that planning obligations may only constitute a reason for granting planning permission for the development if the obligation is:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 8.9 Paragraph 54 of the NPPF states that 'Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Paragraph 56 reinforces the requirement that planning obligations meet the tests set out in Regulation 122 of the CIL Regulations.
- 8.10 The RBKC Planning Obligations SPD has been considered as part of this application and will be used in considering financial contributions to RBKC. Further discussions are to be

held with RBKC Officers during the determination of the planning application to agree the contributions to be made.

- 8.11 LBHF planning guidance on this, precedent research and discussions with officers have informed the draft Heads of Terms. Further discussions are to be held with LBHF Officers during the determination of the planning application to agree the contributions to be made.

Extant Permissions

- 8.12 The Extant Permissions' Section 106 Agreement has also been considered as part of the draft Heads of Terms for a Section 106 Agreement for the Proposed Development and, where relevant, obligations included in the Extant Permissions S106 Agreement have been incorporated into the Section 106 Heads of Terms. Any financial obligations already paid under the Existing Permissions' Section 106 Agreement which were paid to mitigate the impact of the Extant Permissions will, as appropriate, be incorporated or deducted from the Section 106 Agreement to accompany the Proposed Development.

Draft Heads of Terms

- 8.13 The Applicant has prepared draft Section 106 Agreement Heads of Terms. It is intended to be used as a starting point for discussions with both LPAs and other relevant stakeholders. The draft Heads of Terms will be updated as discussions progress post submission of the planning applications. The Applicant will continue to work with the LPAs, the GLA and TfL post-submission to agree the most appropriate form and wording of the Heads of Terms for inclusion in the Section 106 Agreement.
- 8.14 The Applicant will enter into planning obligations which meet the requirements of 122 and 123 of the CIL Regulations 2010. The topics covered by the Heads of Terms are, in the Applicant's opinion, those that the LPAs, the GLA and TfL will expect to be covered by a Section 106 Agreement and avoid duplication with matters covered by planning conditions. There are other topics where the Applicant and LPAs will consider, during the determination period for the Hybrid Applications, whether the most appropriate control mechanism is a condition attached to the respective planning permission or a Section 106 Agreement obligation (example topics in this respect include, inter alia: matters of phasing, construction programme, construction management, estate management, ground conditions, archaeology, noise, air quality, ecology, drainage, waste, and temporary works). It will be important to ensure consistency between both applications and both boroughs in this respect.
- 8.15 The draft Heads of Terms set out within this document are based on the commitments and identified mitigation measures from the suite of supporting planning application documents (in particular the Environmental Statement and Transport Assessment).
- 8.16 The redevelopment of the Earls Court site, in accordance with ambitions and objectives of the LPA, GLA and other stakeholders, is complex and financially challenging. Estimated costs associated with each of the draft Heads of Terms items have been assumed within the viability information submitted with the planning applications. Collaboration and partnership working between the Applicant, LPAs, TfL and GLA during the post submission

stage will be required to ensure the finalised Heads of Terms enable the successful delivery of the Earls Court scheme.

8.17 The Draft Heads of Terms set out below relate to the Proposed Development as a whole. During the post submission stage, through engagement with the LPAs and GLA, the Heads of Terms will be refined to ensure clarity as to the split between the Detailed and Outline Components of the Hybrid Applications as well as the split between each planning application.

8.18 The Draft Heads of Terms are as follows:

Housing

- The Applicant has worked closely with the LPAs and the GLA in relation to the overall housing proposals, including 35% affordable housing (calculated by habitable room). Engagement will continue post submission to work through additional details associated with the make-up of the housing proposals, including controls and obligations relating to unit numbers, tenure, mix and phasing / monitoring
- Affordable housing to be provided on-site in accordance with the submitted details contained within the Housing Statement. Such affordable housing to be delivered in accordance with agreed amount, mix and tenure once agreed with RBKC, LBHF and GLA. Affordable housing requirements for all relevant housing products, including PBSA
- Requirements for the timing of housing delivery together with other relevant obligations as derived from Housing Statement. This will include a reconciliation mechanism to ensure monitoring of housing delivery against minimum housing numbers, to be agreed with RBKC, LBHF and GLA. Minimum housing numbers to be set on a phased basis
- Provision of wheelchair accessible / adaptable homes

Employment Related Accommodation (ERA)

- Submission of an ERA Implementation Strategy in relation to the provision of ERA on the Site
- ERA will be connected to the commercial floorspace to be provided on the Site and in addition to the 35% affordable housing provision
- Working with LBHF in relation to the provision of any ERA in accordance with the approved ERA Implementation Strategy

Transport

- A package of transport measures to mitigate the impacts of the proposed development, informed by the conclusions of the Transport Assessment

Stations

- Financial contributions to assist in funding improvements to Earls Court, West Brompton and West Kensington Stations where required

Buses

- Financial contributions towards bus service and/or bus stop improvements
- Delivery of new relocated bus layover facility, in accordance with details agreed with TfL / London Buses (to include ability for temporary relocation)

Pedestrian and Cycle Improvements

- Financial contribution or works in-kind to deliver improvements to cycle network within immediate site vicinity
- Financial contribution towards the provision of Santander Cycle Docking Stands on-site

Highway and Public Realm Improvements

- Highway and public realm improvements will be subject to further discussions with relevant stakeholders and will include agreement on approach to delivery. The Heads below allow flexibility for either delivery by the Applicant or third party
- Financial contributions to ensure the delivery of highway and public/or public realm improvements in accordance with agreed plans/details. Works to be delivered by either TfL, RBKC or LBHF, as relevant; or draft S278 plans and scope of works to be included within the S106 Agreement
- Highway improvement works to then be carried out in accordance with approved detailed, prior to an agreed trigger point

Transport Steering Group

- Establishment of a transport steering group to monitor the implementation of transport obligations

Travel Plans

- Draft Travel Plans submitted to support the planning application. To include the following measures in addition to sustainable infrastructure proposed across the Site:
 - Sustainable Travel Manager
 - Travel Plan Representatives
 - Working Group

- Welcome Packs
- Development website/app with travel information
- Financial contributions towards the monitoring and review of Travel Plans

Legible London

- Financial contribution towards signage and wayfinding initiatives in and around the immediate vicinity of the Site.

Employment

Affordable Workspace

- Affordable workspace to be provided in accordance with a level to be agreed with the LPAs and the GLA.
- A flexible arrangement to be discussed and agreed, whereby within this overall agreed level, alternative affordable provision of equivalent value can be provided. This to be governed by agreed rates of equivalence for:
 - Discounts on other types of space or other levels of discount
 - Up-front support for businesses such as fit-out or rent-free periods
 - Shared spaces such as co-working
 - The contribution of temporary or meanwhile uses
 - Incentives for early delivery of affordable space
 - Offsite contributions if necessary (although with a preference for on-site)
- Process to be established for agreeing details of future Workspace Management Plans for relevant phases or part phases. Such plans may include details such as:
 - Completion dates, areas, rents, terms and specification
 - The target sectors or organisations the space is aimed at
 - How the space will be marketed and managed
 - Expectations for use, footfall, noise etc.
- Reconciliation mechanism to ensure monitoring of affordable workspace delivery against target, to be agreed on a phase by phase basis.

Skills and Training

- Mechanisms to be agreed for supporting and encouraging employment of local people in construction or other roles. Measures to support training to prepare people for these opportunities. To potentially include:
 - Preparation and agreement of an Employment and Skills Strategy and Implementation Plan
 - Apprenticeships
 - Education outreach
 - Skills, training and employment jobs targets

- Jobs fairs
- Work experience and internships
- Commitment to London Living Wage
- Provision of on-site Skills Centre
- End user employment and training contributions
- Formation of an Earls Court specific Business Forum
- Monitoring and annual reporting, including employment of a skills and employment manager to oversee implementation of Employment and Skills Plan

Supply Chain

- Mechanisms to prioritise local SMEs within the supply chain.

Open Space

- The delivery of key areas of principal open space (as defined within the Control Documents), including minimum area requirements, in accordance with agreed trigger points. The principal open spaces are:
 - The Table
 - Aisgill Gardens
 - The Cascades
 - Lillie Sidings Square
 - Warwick Square
 - West Brompton Square
- Control mechanisms and triggers for the phased delivery of key routes, connections and site accesses
- The delivery of a minimum amount of tree planting. ECDC is committed to delivering a minimum of 1,000 trees (in accordance with agreed definition and specification)

Leisure, Community, Education and Health

- Delivery of multi-use games area in accordance with agreed definition and specification
- The delivery of play space (as defined within the Control Documents) in accordance with agreed trigger points
- Health facilities (subject to ongoing discussions with relevant stakeholders)
- Early years education facility within Plot EC06, in accordance with agreed definition and specification and to a minimum area of 340sqm GEA
- Community use of 502sqm GEA (within Plot WB05)

Culture

- Provision of three cultural venues in the following locations and in accordance with agreed definitions, floor areas and specifications: The Crescent, Empress Place and The Train Shed. The definition of cultural venue will need to be sufficiently flexible to enable a range of facilities and destination type uses

Energy and Sustainability

- Obligations to ensure delivery of Biodiversity Net Gain commitment (a site wide commitment of 85%), including reconciliation on a phase by phase basis.
- Obligations to ensure delivery of Urban Greening Factor beyond the current baseline to >0.4 on a site-wide basis, including reconciliation on a phase by phase basis.
- Obligations requiring compliance with submitted site-wide Energy and Sustainability Strategies and provision of a framework of mechanisms for implementing and monitoring compliance on a phased basis, including in relation to:
 - Content requirements for Reserved Matter Applications
 - Trigger points for review of submitted site-wide Energy and Sustainability Strategies and relationship with future policy, regulatory and legislative changes
 - Performance reporting requirements
 - Carbon offsetting (including an agreed formula for calculating future offset amounts)

Estate Management

- Obligations relating to the agreement and implementation of an Estate Management Plan, including principles associated with public realm access and maintenance.

9. Public Benefits of the Proposed Development

- 9.1 This Chapter summarises the significant range of public benefits that will result from the Proposed Development.
- 9.2 The Earls Court Development will bring forward a world class example of transformative urban development on the Site, the benefits of which will extend well beyond the Site's boundaries. Overall, the single most important and significant benefit is the Site's transformation to create a dynamic new place in West London that will open up this highly accessible, but long-term underused piece of brownfield land to the public and optimise its development output. It will create lasting connectivity between two London boroughs and deliver a network of attractive, diverse and inclusive public open spaces around which high quality new buildings will be arranged to provide substantial numbers of new homes, new jobs, new social infrastructure and new retail, leisure and cultural attractions that will bring activity and vibrancy back to Earls Court. It will be a place to live, a place to work and a place to spend time, while attracting new businesses, experiences and talent to the area.
- 9.3 It would not be possible to bring forward such an extent of urban change and the volume and range of public benefit associated with it, as anticipated by relevant site-specific planning policies, without resulting in some form of impact. But, the scale and nature of public benefit associated with the proposed redevelopment of the Site is considered by the Applicant to be so significant and transformative, that the impacts identified in supporting assessments (especially the ES), will be demonstrably outweighed.
- 9.4 Public benefits may be tangible or intangible and benefits to one audience or decision maker may be different from another. Benefits that meet policy requirements are also a benefit. There is no legislative or policy definition of public benefits, but they are described by the NPPG as *"anything that delivers economic, social or environmental objectives as described in the NPPF in paragraph 8. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit."* (para. 020 Reference ID: 18a-020-20190723).
- 9.5 The NPPF sets out the economic, social and environmental objectives, which public benefits can help deliver / contribute to:
- Economic: *"to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity"*
 - Social: *"to support strong, vibrant and healthy communities ... by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being"*
 - Environmental: *"to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve*

biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”

9.6 ECDC, on behalf of the Applicant, is committed to delivering an exemplary sustainable development that will deliver the substantial public benefits described below over time. While promoting healthier lifestyles, inclusive spaces and an attractive urban landscape. Many benefits are intangible – the quality of design and place-making will be felt and experienced rather than counted in numbers. However, the Proposed Development will also deliver many tangible, or quantifiable, public benefits. A summary of these benefits, broadly grouped but not exhaustive, is set out below, and discussed in further detail in the submitted Public Benefits Statement and Social Value Statement. Taken together, this Planning Statement and those Statements demonstrate a significant range of social, economic and environmental benefits in accordance with the associated definitions within the NPPF and PPG (as referenced above). As relevant and appropriate, planning conditions and S106 Agreement obligations are anticipated to ensure that specific benefits are committed to and controlled through the phased build out of the development.

Place Creation

- **Landscape-led design approach to re-open the Site and amplify nature:** The design of the Proposed Development is landscape-led, with approximately eight hectares of publicly accessible landscape, including parks, public realm, playspace, greened or tree-lined roads and crescents. It will make a substantial contribution to the provision of open space within the wider area, resulting in a significant public benefit for future residents as well as local communities and visitors to the Site from further afield, boosting health and wellbeing. The social value related to environmental quality has been estimated by the submitted Social Value Statement at £31 million.
- **High quality, inclusive and child friendly design:** The Applicant has committed to the delivery of high-quality buildings and landscape that have been designed to a very high standard through extensive engagement. This intent is articulated through the Detailed Components, and the Design Code and Parameter Plans that are submitted for approval for the Outline Component which will ensure that beautiful buildings will be delivered throughout the lifetime of the Proposed Development.
- **Cultural and leisure destination and supporting creative industries:** Culture is a vital part of the approach to the creation of a new place and destination on the Site. Demonstrated by the active and varied meanwhile use, arts and cultural strategies that are well underway on the Site, bringing activity and vibrancy back to Earls Court is a central part of the vision for the Site. The Proposed Development includes floorspace to accommodate a range of types and scales of cultural uses in a variety of locations. This will bring new people, attractions, employment and business opportunities to this part of West London and broaden the variety of activities available to the community. This will help boost local pride and can be effective in promoting social cohesion. Local artists are already engaged in the public art strategy for the Site, which seeks to bring the site's heritage and local identity into its future. The submitted Social Value Statement estimates that the social value of the cultural uses proposed could equate to £34.4 million.
- **Provision of social infrastructure:** A community hub will form part of the LBHF Detailed Component. This space will have the potential to accommodate a range of uses for the community, including healthcare facilities, space for youth activities,

elderly, community focused events, programmes and activities and wellbeing space for classes. The submitted Social Value Statement estimates that the social value that could be created by the community hub could equate to £20.3 million. In addition, a nursery will be provided within the RBKC Detailed Component and the Outline Components will include flexibility to provide a range of health facilities, education facilities and further community space.

- **Retail, restaurants and other active ground floor uses** will not only create a public benefit in terms of offering residents and workers a greater range of facilities in this area and active frontages that will interact and interface with the public realm, but also deliver a diverse range of jobs along with the workspace, benefiting jobs seekers across a broad spectrum of skills and job types.
- **Estate Management:** ECDC, on behalf of the Applicant, is committed to ensuring that a sustainable, vibrant, safe and inclusive place is created by the Proposed Development. The submitted Estate Management Framework sets out how and maintenance, servicing and community engagement is intended to be managed to ensure this commitment is realised.

Housing

- **Up to 3,900 new homes**, including 35% affordable housing (by habitable room), are proposed across a range of types and tenures including private for sale, build to rent, social rented, shared ownership & intermediate for rent, in addition to new student housing (which will include 35% affordable bedrooms), as well as the potential for co-living and older persons living that will make a significant contribution to housing delivery in RBKC and LBHF.
- **Wider economic benefits from housing:** Based on the Illustrative Masterplan, household spending by new residents in the local economy could be in the region of £40 million per year and a further £5.5 million per year from student spending, helping to support local town centres within LBHF and RBKC. Council tax (£4.4 million per year) and New Homes Bonus (£6.8 million as a single payment) would also be generated as important revenue for both local authorities and the GLA.
- **New high quality, energy efficient housing** is proposed which will reduce carbon emissions, energy use and the cost for residents to run their own homes. The provision of energy efficient homes has been estimated by the submitted Social Value Statement to have a social value of £1.185 million.

Employment and Economic Development

- **Delivery of a new employment district and Major Centre, new permanent jobs and a range of business and employment opportunities:** The Proposed development will deliver a range of complementary land uses in a highly accessible location to create a new Major Centre in line with the definition set out in the London Plan. The Commercial Strategy includes the creation of a significant amount of workspace across the Site in a range of forms, types and scales ranging from modern large scale office space to smaller workspace and affordable workspace to attract and accommodate business of all sizes, including Small-Medium Enterprises, creative industries, corporations and logistics operators. This will create opportunities for local businesses to benefit from the agglomeration effects from new businesses moving to the Site. The Commercial Strategy is also designed to attract inward investment and open new opportunities through collaboration and supply

chain benefits. Up to 14,500 direct jobs (FTE) could be accommodated as part of the Proposed Development.

- **Affordable workspace** will be delivered through a flexible arrangement (subject to further discussion with RBKC and LBHF officers) that will prioritise the needs of businesses to assist with occupation and operation of workspace (for example in relation to rent discounts, assistance with fit out costs, provision of co-working spaces). The framework for how affordable workspace will be delivered will be discussed and agreed with RBKC and LBHF as part of S106 Agreement discussions post-submission of the Hybrid Planning Applications.
- **Ensuring access to employment, skills and training opportunities:** During the construction phase it is estimated there will be approximately 1,150 full time construction jobs created on average over the build programme. The scale of this project creates a fantastic opportunity for workers within this sector to gain valuable skills and training opportunities over the long term. The Applicant is committed to supporting employment initiatives to maximise local benefit (in line with TfL's Sustainable Development Framework and both borough's planning obligation guidance).
- **Wider economic benefits from workspace:** Based on the Illustrative Masterplan, it is estimated that the employment within the Proposed Development would generate approximately £1.2 billion GVA per year to the economy as a whole and the spending by workers within the local economy could be in the region of £30 million per year and the estimated business rates revenue could be in the region of £38 million per year.
- **Commitment to the continued implementation of a meanwhile use strategy** to benefit existing residents and workers throughout the determination and construction stages of development.
- **Potential provision of a Logistics Hub:** Space created below the Table Park is designed to allow consolidation of logistics and reduce vehicles coming into the Site, as well as reducing impacts on local road networks, with potential to include a Logistics Hub facility for consolidation of goods for delivery to the local area, which is currently lacking in this part of London.

Good Growth and Sustainable Development

- **Optimisation of site capacity and density:** in line with the strategic objectives of planning policy at all levels, the Proposed Development has been prepared through extensive pre-application engagement and design evolution to make the most effective use of the land and deliver good growth. It will deliver a sustainable development that provides substantial amounts of new public realm, homes and jobs in a highly in a sustainable and accessible Opportunity Area location.
- **Exemplar in sustainability:** The Applicant has proposed an innovative Sustainability Strategy that encompasses three pillars of sustainability that goes above and beyond the requirements of planning policy in many respects, focussing on environmental wellbeing; social value; and economic inclusion. The Applicant's ambition is to go beyond net zero, and create a future proofed, resilient and sustainable development.

Transport

- **Connectivity improvements:** Earls Court is in a highly sustainable location, with very good public transport links, but has been closed to the public for many years. The Proposed Development will re-open the Site, create pedestrian and cyclist-priority routes through the Site, incorporating sustainable transport initiatives through an approved Travel Plan, and contributing to improvements to signage and wayfinding, pedestrian access to stations and cycle routes outside the Site.
- **Transport improvements:** The Proposed Development will provide financial contributions towards a range of station, highway, bus service and cycle route improvements, which will be agreed through on-going engagement with the LPAs and TfL and subject to S106 obligations.

10. Conclusion

- 10.1 Section 38(6) of the Planning and Compensation Act 2004 requires the submitted Hybrid Applications to be determined in accordance with the relevant Development Plan unless material considerations indicate otherwise. When assessing the Hybrid Planning Applications, the decision-maker is required to give full consideration to the provisions of the Development Plan and all other material considerations. They are also required to consider the likely significant environmental effects of the development.
- 10.2 This Planning Statement has considered the Proposed Development, as set out within the two Hybrid Applications, against relevant national, regional and local planning policy, relevant guidance and material considerations. A suite of supporting documents provide the necessary information relating to how the Proposed Development has been prepared, consulted on and assessed. This Planning Statement has been informed by the supporting documents, particularly the ES, in terms of understanding the likely significant environmental effects of the Proposed Development.
- 10.3 The Proposed Development complies with the most relevant planning policies at national, regional and local levels. While there are some adverse impacts identified within this Planning Statement and relevant supporting documents, including on neighbour amenity and heritage impacts, the Proposed Development – in both the Early Phases Scenario and All Phases Scenario – is in overall conformity with the relevant Development Plans when read as a whole. The identified impacts are clearly and convincingly outweighed by the very significant tangible and intangible benefits summarised in this Planning Statement and as described in the supporting Public Benefits Statement.
- 10.4 Notwithstanding the above, if either LPA were to conclude that the Proposed Development is not in general conformity with the relevant Development Plans, the contents of this Planning Statement and information submitted as part of the Hybrid Applications demonstrate that there are very substantial and material considerations for the Hybrid Applications to be granted planning permission.
- 10.5 The Proposed Development is the product of wide-ranging and meaningful engagement over a four year period. This has involved many different stakeholders and the Proposed Development balances different priorities and considerations. The below reasons set out, in summary, why the Hybrid Planning Applications are acceptable in planning terms:
- The Proposed Development will result in wide ranging and significant benefits that will transform a longstanding predominantly vacant and under-utilised brownfield Site to deliver a residential-led mixed-use development of strategic importance.
 - The Proposed Development is the product of a carefully considered design-led process that has evolved through extensive engagement over four years to ensure a balance is struck between optimisation of development on the Site and the effects that result from it to deliver the maximum amount of public benefits. The outcome of this process is a landscape-led development that will rejuvenate the Site, create a new place consisting of generous public open spaces, beautiful buildings and tree lined streets designed by world class architects for the enjoyment of a wide range of

people who will work, live and spend time in the development for many years to come.

- The nature and scale of the Proposed Development, including its potential contribution to the delivery of housing, affordable housing and job creation at a borough and London-wide level, is such that it is a development which would have an important and significant impact on the implementation of the London Plan and Borough Local Plans.
- The Proposed Development will provide a wide range of different uses, creating a new neighbourhood and destination for residents, workers and visitors. New homes, workspace, cultural venues, community, health, leisure facilities as well as retail uses will be created, thoughtfully arranged around significant new areas of high quality public realm, landscaping and open space.
- The Proposed Development meets the objectives and policies for the Site's Opportunity Area designation and relevant site allocations within the Development Plans. It will bring about much needed social, physical, economic and environmental transformation of this strategically important Site.
- The Proposed Development has been robustly tested and assessed. Across a wide range of relevant topics, the supporting documents appropriately respond to and address Development Plan policy and supplementary planning guidance. As is usual for a major development of this nature, some adverse environmental impacts are likely and, where appropriate, mitigation has been identified and will be secured to address adverse impacts.

10.6 The Applicant anticipates that appropriate, relevant, reasonable and necessary planning conditions and planning obligations will be secured to ensure that the Proposed Development is acceptable in planning terms and the identified environmental impacts are mitigated. This Planning Statement includes draft Section 106 Agreement Heads of Terms. These demonstrate, in broad and initial terms, the Applicant's commitment to ensuring that the key public benefits and necessary mitigations described in this Planning Statement are secured.

10.7 The Earls Court Site represents a long-standing under-utilised brownfield development opportunity. The Site is hugely challenging, needing to overcome significant infrastructure constraints through investment. Its successful redevelopment, creating a place and destination in line with the objectives of the relevant Development Plans, requires collaborative efforts from stakeholders. Significant engagement has occurred to date, and the Applicant looks forward to further engagement post submission of the Hybrid Applications with all stakeholders. Most importantly, ongoing coordination and collaboration between the Applicant, RBKC, LBHF and the GLA will be needed to ensure the policy ambitions for the Site are realised.

10.8 For the reasons outlined above, the Applicant is of the view that planning permission should be granted for the Hybrid Applications.

Appendices

Appendix 1

Planning History

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

Site Planning History			
Reference	Address	Description of Development	Decision
RBKC			
PP/11/01937	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, London	Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3), office use (Class B1), retail use (Classes A1-A5), hotel and serviced apartments uses (Class C1), education, health, community, culture and leisure use (Class D) below ground ancillary space (including parking/plant /servicing), vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities, enabling works including related temporary works including construction of an access road and structures and other works incidental to the development.	Approved – 14 November 2013
PP/13/07062	Earls Court Village Area - Redevelopment of the Earl's Court Exhibition Centre, the Lillie Bridge Rail Depot, the West Kensington and Gibbs Green housing estates and adjoining land	Submission of reserved matters pursuant to outline planning permission dated 14th November 2013 (ref:PP/11/01937); relating to layout, scale, appearance and landscaping; submitted for approval for the following Development Parcels in RBKC: WV02 (part), WV04-1 (part), WV04-2 (part), WV04-3 (part), WV06-1, WV06-2, WV06-3, LP-1 (part), LP-2, LP-3 (part), LP-4 (part), LP-5, LP-7, LP-9 (part) and LP-10 (MAJOR APPLICATION)	Approved – 10 April 2014
NMA/14/00612	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens,	NMA: Amendments to bulustrade to upper floor (WV06E), flue to energy centre (WV04E), canopy to entrance (WV06B), extension of first floor balcony (WV04B and WV06D), extensiion of photovoltaic panels (WV06B) and WV06D), extension of photovoltaic panels	Approved – 10 March 2014

Site Planning History			
Reference	Address	Description of Development	Decision
	Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, London	(WV06B) 270mm extension to penthouse level (WV06A), extension of vehicular ramp by 2600mm (WV06B), amendments to road alignment (parcels WV06-1 and WV06-2) and extension of basement depth 0.3m (level B2).	
NMA/14/02071	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	Non-material amendment to planning permission PP/11/01937 (Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3), office use (Class B1), retail use (Classes A1-A5), hotel and serviced apartments uses (Class C1), education, health, community, culture and leisure use (Class D) below ground ancillary space (including parking/plant /servicing), vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities, enabling works including related temporary works including construction of an access road and structures and other works incidental to the development) to amend Conditions 46 to 51 and add Condition 92 (all relating to land contamination)	Approved –06 May 2014
NMA/14/03644	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	Non-material amendment to planning permission 11/01937 (Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3), office use (Class B1), retail use (Classes A1-A5), hotel and serviced apartments uses (Class C1), education, health, community, culture and leisure use (Class D) below ground ancillary space (including parking/plant /servicing), vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities, enabling works including related temporary works including construction of an access road and structures and other works incidental to the development) to amend conditions 26 and 60 (both relating to demolition).	Approved – 08 July 2014
NMA/14/04004	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	Non material amendment to planning permission 11/01937 (Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3), office use (Class B1), retail use (Classes A1-A5), hotel and serviced apartments uses (Class C1), education, health, community, culture and leisure use (Class D) below ground ancillary space (including parking/plant /servicing), vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities,	Approved – 25 July 2014

Site Planning History			
Reference	Address	Description of Development	Decision
		enabling works including related temporary works including construction of an access road and structures and other works incidental to the development) to amend condition 91 (use of Northern Access Road for any construction or demolition traffic).	
PP/15/00369	Land comprising of 348-350 Old Brompton Road, a cutting for the West London Line, hard standing to the south of Earl's Court Exhibition Centre, and parts of Lillie Bridge and Old Brompton Road	Demolition and alteration of existing buildings and structures and redevelopment of the site, for the erection of buildings comprising single storey basement, and part three, part four storey buildings for 638sqm of retail space (A1), 16 residential units (C3), and related ancillary uses; together with the provision of new open space; provision of vehicular and pedestrian accesses and routes from Old Brompton Road; including all associated highway works; structures for decking over existing rail lines and tunnels; and other ancillary and incidental works to the development	Approved 1st April 2015
NMA/16/03870	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	Non-material amendment to planning permission 11/01937 to change the wording of condition 15 to clarify that the area restrictions imposed by this condition relates to above ground floor area only	Approved – 13 July 2016
NMA/16/05167	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	Non-material amendment to outline planning permission PP/11/01937 granted 14/11/2013 (Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3), office use (Class B1), retail use (Classes A1-A5), hotel and serviced apartments uses (Class C1), education, health, community, culture and leisure use (Class D) below ground ancillary space (including parking/plant /servicing), vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities, enabling works including related temporary works including construction of an access road and structures and other works incidental to the development). Amendments to approved Maximum and Minimum Height Paramenter Plans listed in Condition 12 and Mandatory Design Guidelines as referenced in Condition 13 in relation to plot WV03, namely for the removal of the bridge link between the north and south buildings and the linked facade across the front elevation.	Approved – 19 September 2016
PP/16/07386	Land Bounded by West Cromwell Road, Warwick	Submission of reserved matters pursuant to outline planning permission PP/11/01937 dated 14/11/2013 relating to layout, scale, appearance and landscaping for Development Parcels	Approved – 03 May 2017

Site Planning History			
Reference	Address	Description of Development	Decision
	Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	WV03, LP-7 and LP-8. Reserved matters submission in relation to landscaping only for parcels WV04-2 (in part), WV06-3 (in part), LP-5 (in part), WV02 (in part) and WV05 (in part). (MAJOR APPLICATION).	
PP/16/07131	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	Non-material amendment to planning permission PP/11/01937 (Redevelopment) for the Mandatory Design Guidelines to read " Mandatory Design Guidelines means those provisions with the Design Guidelines Rev A (Dec 2011) which are indicated therein as mandatory"	Approved – 22 November 2016
NMA/16/07421	Land bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the railway lines, London, SW5	Non-material amendment to planning permission 11/01937 relating to location of cycle hire docking station within development parcel WV03; location of on-street parking within development parcel WV03; and restriction of deviation along road edge within WV03	Approved – 01 December 2016
PP/16/07428	Earls Court Village Area - Redevelopment of the Earl's Court Exhibition Centre, the Lillie Bridge Rail Depot, the West Kensington and Gibbs Green housing estates and adjoining land	RBKC RMA for layout in relation to plots: WV04-1, WV04-2, WV06-1, WV06-2, WV06-3, LP-2, LP-3, LP-4 and LP-9 (to allow removal of 18 car spaces and replace with 200 cycle spaces	Approved – 03 May 2017
PP/18/07653	Land bounded by West Cromwell Road, the tracks of the West London Line, Lillie Bridge, Lillie Road and North End Road, London	Submission of reserved matters pursuant to outline planning permission dated 14th November 2013 (ref. 2011/02001/OUT) relating to Layout, Scale and Appearance; submitted for approval of parts of the following Development Parcels: BW05-1; BW07-3 (relevant to buildings DE, F1 and G in BW05 and buildings A, B and G in BW07-3 only above ground); and BW05-1, BW05-2, LP-4 (part), LP-6 (part), BW07-2 and BW07-3 (relevant to basement below ground only); comprising a mixed use development of 490 residential units and 2,670 sqm (GEA) of commercial floorspace (Use Class A1-A5) and associated cycle and car parking spaces, waste storage and plant at basement level.	Approved – 12 July 2019

Site Planning History			
Reference	Address	Description of Development	Decision
PP/18/07869	Land bounded by West Cromwell Road, the tracks of the West London Line, Lillie Bridge, Lillie Road and North End Road, LONDON	Submission of reserved matters pursuant to outline planning permission dated 14th November 2013 (ref. 2011/02001/OUT) relating to Layout, Scale and Appearance; submitted for approval of parts of the following Development Parcels: BW05-1; BW07-3 (relevant to buildings DE, F1 and G in BW05 and buildings A, B and G in BW07-3 only above ground); and BW05-1, BW05-2, LP-4 (part), LP-6 (part), BW07-2 and BW07-3 (relevant to basement below ground only); comprising a mixed use development of 550 residential units and 2,670 sqm (GEA) of commercial floorspace (Use Class A1-A5) and associated cycle and car parking spaces, waste storage and plant at basement level.	Approved – 12 July 2019
NMA/18/07983	Land Bounded by West Cromwell Road, Warwick Road, Philbeach Gardens, Eardley Crescent, Lillie Road, Old Brompton Road and the Railway Lines, LONDON	Non material amendment to planning permission 11/01937 to amend the wording of condition 17 relating to the ranges and sizes of the residential unit mix; and to amend the wording of condition 32 to make the trigger point for approval of the Site Wide Estate Management Framework prior to occupation of the first residential unit on the OPP1 site	Approved 21 December 2018
PP/21/00272	344-350 Old Brompton Road, LONDON, SW5 9JU	Redevelopment of the site to provide new residential units (Class C3) and flexible commercial (Class E) floorspace within a new building ranging in height from 4 to 9 storeys; together with plant and cycle parking facilities and associated servicing, access, landscaping and all associated ancillary works and structures	Approved 1st October 2021
PP/22/02336	Warwick Road Apron, Warwick Road, LONDON	Flexible temporary use of the site (until 23rd June 2026) for activation, including art installations, coffee cart, public realm and seating, small scale live music, and public consultation events.	Approved 01 July 2022
NMA/23/02884	344-350 Old Brompton Road, LONDON, SW5 9JU	Non-material amendment to planning permission PP/21/00272 (Redevelopment of the site (MAJOR APPLICATION)) for below ground structural changes to facilitate the relocation of High Voltage (HV) cables adjacent to the consented development	Approved 9th June 2023
PA/23/08286	Land between West London Line, Old Brompton Road and London Underground District Line tunnel structure	Prior Notification of Demolition of existing podium slab to enable future redevelopment of the site	Approved – 22nd February 2024

Site Planning History			
Reference	Address	Description of Development	Decision
PP/23/08120	Land between the rear of Eardley Crescent and the West London Line.	Temporary planning permission for the installation of three Glass Reinforced Plastic (GRP) enclosures and full planning permission for a subterranean high voltage (HV) cable duct.	Approved 23 rd April 2024
LBHF			
2011/02001/OUT	Earls Court 2 Exhibition Centre, Lillie Bridge Rail Depot, West Kensington And Gibbs Green Housing Estates and Adjoining Land	Demolition and alteration of existing buildings and structures and the comprehensive redevelopment of the site including new open space, vehicular and pedestrian accesses and routes and a mixed use development comprising buildings to accommodate residential use (Class C3); office (Class B1); retail (Classes A1- 5); hotel and serviced apartments (Class C1); leisure (Class D2), private hospital (Class C2); Education/Health/Community/Culture (Class D1); below ground ancillary space (parking/plant/servicing etc). Replacement of the existing London Underground depot at Lillie Bridge with new depot, vehicle parking and associated highways alterations, structures for decking over existing rail lines and tunnels, waste and utilities, enabling works including related temporary works and structures and other works incidental to the development. Earls Court 2 Exhibition Centre, Lillie Bridge Rail Depot, West Kensington And Gibbs Green Housing Estates And Adjoining Land.	Approved 14 November 2013
2013/05200/RES	Earls Court 2 Exhibition Centre, Lillie Bridge Rail Depot, West Kensington And Gibbs Green Housing Estates and Adjoining Land	Submission of reserved matters pursuant to outline planning permission dated 14th November 2013 (ref: 2011/02001/OUT); relating to layout; scale; appearance and landscaping; submitted for approval for the following Development Parcels in LBHF: BW05-1; BW05-2; BW07-2; BW07-3; LP-4 (part); LP-6 and LP-9 (part); comprising a mix use development of 690 residential units and 4,895 m ² (GEA) of commercial floor space (Use Class A1-A5), provision of landscaped public and private open space; and associated cycle and car parking spaces at basement and ground level. Earls Court 2 Exhibition Centre, Lillie Bridge Rail Depot, West Kensington And Gibbs Green Housing Estates And Adjoining Land.	Approved – 03 April 2014
2014/00444/NMAT	Earls Court 2 Exhibition Centre, Lillie Bridge Rail Depot, West Kensington And Gibbs Green Housing Estates and Adjoining Land	Non-Material Amendments to Outline Planning Permission (Ref. 2011/02001/OUT) dated 14th November 2013, comprising: (a) Amendments to the approved parameters (above ground) involving: Development Parcel BW05-1 (increase in shoulder height of building by 85 mm); BW05-2 (inclusion of canopies over building entrances and addition of balustrade and bay window projections outside the approved parameters); BW05-2 and BW05-3 (amendment to minimum parameter height of development plot BW05).	Approved – 27 th February 2014

Site Planning History			
Reference	Address	Description of Development	Decision
		(b) Amendments to the approved basement parameter (below ground) involving the inclusion of the full footprint of the Empress State Building within the basement parameter plan and increase of basement area adjacent to the Stabling Box. (c) Amendment to Condition 13 in respect to the land use description associated with Development Plot BW07.	
2014/01686/NMAT	Earls Court 2 Exhibition Centre, Lillie Bridge Rail Depot, West Kensington And Gibbs Green Housing Estates And Adjoining Land	Non-Material Amendment to Outline Planning Permission (ref:2011/02001/OUT) dated 14 November 2013. Amendments to wording of contaminated land conditions (nos 50 - 54) to allow for the discharge of conditions on a development parcel basis.	Approved – 8 th April 2014
2016/05481/NMAT	Earls Court 2 Exhibition Centre, Lillie Bridge Rail Depot, West Kensington And Gibbs Green Housing Estates And Adjoining Land	Non-Material Amendments to Outline Planning Permission (Ref. 2011/02001/OUT) dated 14th November 2013, comprising: (a) Amendments to the approved Development Parcel Plan comprising a simplification of Development Parcel boundaries and references; and (b) Amendment to Conditions 1-6 in respect to the Development Parcel references in these Conditions, consistent with the amended Development Parcel Plan.	Approved – 19 th December 2016
2020/02100/FUL and 2020/02098/FUL	Lillie Road Units – West Brompton Crossing 16 – 26 Lillie Road London SW6 1TS; and West Brompton Crossing 2-14 Lillie Road And The Rear Gardens Of 14 Lillie Road And 7-11 Empress Place London SW6 1TU	Temporary change of use from mini cab office (Sui Generis) to flexible uses (Class A1/A3/D1) at no. 18 Lillie Road, and betting shop (Sui Generis) to flexible uses (Class A1/A3/D1) at 20-22 Lillie Road. (Renewal of temporary planning permission reference: 2017/03179/FUL dated 10 October 2017, for a further period of three years). West Brompton Crossing 16 - 26 Lillie Road London SW6 1TS. Temporary change of use from Class A1 to Class A3 at 6 Lillie Road, Class A4 to Class A3 at 8 Lillie Road, Class C3 to Class A4 at 14 Lillie Road, and associated temporary works, including the use of the rear of 14 Lillie Road and 7-11 Empress Place as a communal garden. (Renewal of temporary planning permission reference: 2017/03178/FUL dated 10 October 2017, for a further period of three years). West Brompton Crossing 2-14 Lillie Road And The Rear Gardens Of 14 Lillie Road And 7-11 Empress Place London SW6 1TU.	Approved – 13 October 2020
2021/01443/FUL	Former Earls Court 2 Exhibition Centre Land, Empress Place London	Use of the former Earls Court Exhibition Centre 2 site for a period from 1 July to 10 October 2021, for the temporary erection (including installation and de-installation) of two main event structures - a big top tent and theatre, a box office, food and drink units, amusement rides, a beach area, toilets, storage, outdoor seating areas and fencing, in conjunction with Underbelly	Approved – 16 June 2021

Site Planning History			
Reference	Address	Description of Development	Decision
	SW6 1TW	'London Wonderground Event 2021' (associated Advertisement Consent Application ref: 2021/01444/ADV).	
2021/01444/ADV	Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	Temporary display of externally illuminated signage at the Earls Court 2 site, in association with the proposed pop-up 'London Wonderground' event, over the period between 1 July to 10 October 2021 (dates include all installation and de-installation periods).	Approved – 16 June 2021
2021/03095/FUL	Community Hub - Former Blue Car Park (part Of The Earl's Court Development Site) Off Aisgill Avenue, London W14	Retention of an existing building for a temporary use as a community hub (in the full range of Use Class F.2) together with the retention of landscaping works, cycle parking and associated works.	Approved – 24 November 2021
2021/04027/FUL	Empress Studios -7-17 Empress Place London SW6 1TT	Change of use of nos. 9-17 Empress Place from residential use to artistic and creative studios (Class E(g)) and no.7 Empress Place from residential to joint live/work units (a combined Class C3/E(g) use) for a temporary period of 5 years; and associated cycle parking/storage facilities in Empress Place.	Approved – 25 February 2023
2022/01426/ FUL	9 Beaumont Avenue London W14 9LP	Change of use and refurbishment of the former Mannequin Factory (Class B2) to a combined theatre/performance space with restaurant and bar areas (Sui Generis use), along with the use of the rear section of site as a church (Class F1 (f)), for a temporary period of 5 years.	Approved – 1 November 2022
2022/02045/FUL	BBC Earth Experience - Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	Installation of a temporary building for the purposes of a BBC exhibition for a 2 year period (excluding installation de-installation) and together with other associated and enabling works to include a gift shop, back of house and support facilities, external landscaping, boundary fencing, plant and vehicle servicing access and cycle parking arrangements.	Approved – 08 November 2022
2022/02061/NMAT	Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	Non Material Amendment to Condition no.1 and 2 of planning permission (ref: 2022/00520/FUL) dated 13 April 2022, in order to extend the temporary period of the Underbelly use of the former 'Earls Court Exhibition Centre 2 site', for an operational period from 5th May until 18th September 2022, for the temporary erection (not including installation and de-installation) of event structures which excludes the Udderbelly theatre and the Studio venue, comprising alterations to site layout and seating areas, involving the installation of outdoor cinema, beach and boules, together with the two outdoor bars, four	Approved – 25 August 2022

Site Planning History			
Reference	Address	Description of Development	Decision
		food concessions, toilets, storage and fencing, in conjunction with 'Underbelly' Earls Court' Event 2022.	
2022/03129/FUL	Empress Space - Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	Temporary use of part of the former 'Earls Court Exhibition Centre 2 site', for an operational period from March 2023 until April 2025 for the temporary erection (not including installation and de-installation) of an open public access route, a flexible pop-up food and beverage area comprising up to 3 units, means of enclosure, limited flexible seating; and associated servicing.	Approved – 5 January 2023
2022/03425/FUL	Skills Hub - Earls Court 2 Empress Approach London SW6 1TW	Erection of four single-storey portable units for use as a Skills Hub (Class F.1) for an operational temporary period from March 2023 until March 2026 (not including the installation and de-installation periods); with access from Empress Place and associated groundworks, drainage, means of enclosure, servicing and cycle parking.	Approved – 01 March 2023
2022/00520/FUL	Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	Temporary use of the former 'Earls Court Exhibition Centre 2 site', for an operational period from 5th May 2022 until 16th July 2022 and for the temporary erection (not including installation and de-installation) of two event structures - a studio and theatre 'Udderbelly', with two outdoor bars, four food concessions, toilets, storage, outdoor seating areas and fencing, in conjunction with 'Underbelly' Earls Court' Event 2022 (associated Advertisement Consent Application ref: 2022/00521/ADV)	Approved – 13 April 2022
2022/00521/ADV	Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	Temporary display of signage at Earls Court Exhibition Centre 2 site, in association with the pop-up 'Underbelly' 'Earls Court' Event, over the periods between 5th May 2022 and 16th July 2022 (not including installation and de-installation periods).	Approved – 13 April 2022
2022/03667/FUL	Earls Court 2 Empress Approach London SW6 1TW	Replacement of boundary gates fronting Empress Place; including alterations to the existing boundary wall to provide a fire escape door and associated wall mounted light fittings.	Approved – 27 February 2023
2023/00782/ADV	Earls Court 2 Empress Approach London SW6 1TW	Display of externally illuminated signage on boundary wall at the end of Empress Place.	Approved – 24 May 2023

2023/02631/FUL	Earls Court 2 Empress Approach London SW6 1TW	Temporary installation of five padel courts, with associated enclosures, entrance arch structure and floodlighting; six single and two-storey portacabin units (including food stalls, wellness room, bar, office and reception); for use as outdoor padel sports and recreation (Class F.2) with access from Empress Place, for an operational period from October 2023 until December 2025; associated groundworks, drainage, means of enclosure, lighting, servicing and cycle parking.	Approved - 18th January 2024
2023/02632/ADV	Earls Court 2 Empress Approach London SW6 1TW	Temporary installation of non-illuminated signage on the portacabin units and entrance archway signage associated with the proposed temporary outdoor padel sports and recreation use, for an operational period from October 2023 until December 2025.	Approved - 18th January 2024
2023/02737/FUL	Lillie Road Shops 2-14 Lillie Road And The Rear Gardens Of 14 Lillie Road And 7-11 Empress Place London SW6 1TU	Temporary change of use from Class A4 to Class E at 8 Lillie Road, Class A5 to Class E at 10 Lillie Road, Class C3 to Sui Generis at 14 Lillie Road, and associated temporary works, including the use of the rear of 14 Lillie Road and 7-11 Empress Place as a communal garden.	Approved – 20th June 2024
2023/02738/ADV	Lillie Road Shops 2-14 Lillie Road And The Rear Gardens Of 14 Lillie Road And 7-11 Empress Place London SW6 1TU	The display of 7 externally illuminated fascia signs and 6 non-illuminated projecting wall signs at 2- 14 Lillie Road, and 1 illuminated painted graphic sign at 10 Lillie Road.	Approved – 20th June 2024
2023/02739/FUL	Lillie Bridge Shops 16 - 26 Lillie Road London SW6 1TS	Temporary change of use from mini cab office (Sui Generis) to flexible retail (Class E/F.1) at 18 Lillie Road, and betting shop (Sui Generis) to flexible retail (Class E/F.1) at 20-22 Lillie Road.	Approved – 23 May 2024
2023/02740/ADV	Lillie Bridge Shops 16 - 26 Lillie Road London SW6 1TS	Display of 6 externally illuminated fascia signs and 5 non-illuminated projecting wall signs at 16-26 Lillie Road.	Approved – 23 May 2024
2024/01054/NMAT	Former Earls Court 2 Exhibition Centre Land, Empress Place London SW6 1TW	Non-Material Amendment to extant planning permission (ref: 2022/02045/FUL) dated 8 November 2022, amending the description of development to: Installation of a temporary building for the purposes of a 'live entertainment' use, for a 2-year period (excluding installation de-installation) and together with other associated and enabling works	Approved – 17th June 2024

		<p>to include a gift shop, back of house and support facilities, external landscaping, boundary fencing, plant and vehicle servicing access and cycle parking arrangements.</p> <p>Together with an amendment to the approved Operational Management Plan (Condition 3) and variation to Condition 5 to permit an increase in the capacity of the building from 650 to 700 guests / visitors in total at any one time.</p>	
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Appendix 2

Tall Buildings Policy Compliance Tables

London Plan Policy D9 and LBHF Local Plan Policy DC3 Compliance Tables for Outline and Detailed Components:

Outline Components

London Plan Policy D9 Outline Component compliance	
Policy D9 Part C	Assessment Outline
Visual Impacts	
C1a i, ii, iii Long, mid-range and immediate views	<p>The submitted TVA in ES Volume 2 assesses the visual impact of the Proposed Development on the surrounding townscape in long, medium and immediate view locations agreed with the RBKC and LBHF officers as part of the pre-application process.</p> <p>There would be no effects on regionally designated LVMF views.</p> <p>The Hybrid Application material demonstrates that the Proposed Development complies with the London Plan and relevant guidance in terms of townscape and visual impacts given the policy recognition that the Site is suitable for Tall Buildings and their visual impacts have been minimised.</p> <p>The Design Code will ensure that the future RMA would be of a high quality architectural design and have a massing coherence through the design controls.</p>
C1b – tall buildings should reinforce the spatial hierarchy of local context, aid legibility and wayfinding	<p>The height strategy has been informed by a design-led approach and a detailed understanding of site context. A layered approach to scale has been adopted with mass stepping up towards the centre of the Site.</p> <p>One single landmark building is proposed as the centre piece of a main tall building cluster (most of which forms the Detailed Components in RBKC and LBHF, but also includes Plot WB06 and other lower tall buildings in RBKC which are submitted as part of the Outline Component) that is located next to the 31 storey Empress State Building and arranged around the central Table Park, with other taller buildings located at key points around main areas of open space and at Site entrances</p>

	<p>along a north-south 'spine' within the Site. The central tall building cluster and landmark building will mark the redevelopment of the Opportunity Area and identify the location of the new destination and piece of London that is being created, while other tall buildings will also assist with legibility and wayfinding.</p>
C1c – exemplary architecture	<p>The Architect vision is set out and illustrated in the DAS Volume 1: Outline Component and would be delivered through the Design Code and Parameter Plan control documents.</p> <p>The approach to architecture has been informed by significant engagement with local and statutory stakeholders and is based on a detailed understanding of site context to ensure it is of the highest quality.</p>
C1d - Account to be taken of harm to heritage assets, where harm arises public benefit must outweigh harm	<p>The impact upon heritage assets is assessed within the Built Heritage Statement – Environmental Statement Volume 2.</p> <p>As set out in the Planning Benefits section of this Statement, the Proposed Development will provide significant benefits that would outweigh any identified harm in line with NPPF para. 208.</p>
C1e and f – World Heritage setting and Thames Policy Area	<p>The Proposed Development would have no adverse impact upon any World Heritage Setting or Thames Policy Area.</p>
C1g – solar glare	<p>The Solar Glare section of the submitted Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill ES Chapter confirms no significant adverse effects will arise from the Proposed Development.</p>
C1h – minimise light pollution	<p>To be controlled by appropriately worded planning condition.</p>
Functional Impact	
C2a – ensure safety of occupants	<p>Fire Safety has been integral to the development of the masterplan and a site-wide Fire Strategy is submitted with the Hybrid Applications.</p> <p>RMA would be required to provide additional Fire Statements and Gateway One Fire Statements to demonstrate compliance with the London Plan and relevant regulations.</p>
C2b – servicing and maintenance	<p>See submitted Delivery and Servicing Report.</p>

<p>C2c – entrance, access routes and ground floor designed to allow for peak time use and no overcrowding;</p>	<p>Entrance and access routes would be located adjacent to generous public realm areas. This will be controlled by the Design Code for the Outline Components.</p> <p>The Design Code would ensure that entrances are legible, accessible and clearly identifiable from the street.</p>
<p>C2d – public transport capacity, walking and cycling networks</p>	<p>See submitted Transport Assessment (TA). The Site benefits from an excellent PTAL (mostly 6a).</p> <p>The Proposed Development will significantly enhance local walking and cycling connections within the wider area (east-west and north-south) and remove a historic severance.</p> <p>The Proposed Development will also enhance local connections in line with the London Plan Healthy Street policies and as set out in the ATZ assessment of the TA.</p>
<p>C2F – jobs, services and economic activity and regeneration potential should inform the design to maximise these benefits and role of development as a catalyst for change</p>	<p>As set out in Chapter 7 of this Statement and the DAS Volume 1: Outline Component, significant testing of the capacity of the Site has been undertaken to ensure that the Proposed Development makes the best use of the Site and optimises its potential.</p> <p>The Proposed Development provides a range of uses that would serve as a catalyst for change at the Site and deliver significant economic benefits including jobs.</p> <p>The Outline Component provides suitable flexibility within certain plots to ensure that the Proposed Development can respond to future market requirements.</p> <p>See also the submitted Commercial Strategy and ES Socio Economics Chapter in relation to anticipated job creation as a result of the Proposed Development.</p>
<p>C2g – buildings should not interfere with aviation, navigation or telecommunication;</p>	<p>This is assessed in the submitted Telecommunications Impact Assessment and the Aviation Impact Assessment prepared within Appendix 2 of the ES.</p>
<p>Environmental Impact</p>	

C3a – wind, daylight sunlight and overheating must be considered;	<p>As part of the design-led approach, wind, daylight/sunlight, overshadowing and overheating considerations have been considered from the outset and have informed the evolution of the Proposed Development through testing throughout the design process.</p> <p>See also: DAS Volume 1: Outline Component and ES Chapters 15 and 16 and the Contextual and Internal Daylight, Sunlight and Overshadowing Reports submitted as part of the Hybrid Applications.</p>
C3b and c -noise and air quality	<p>As part of the design-led approach noise and air quality considerations at the Site were considered from the outset and have informed the evolution of the Proposed Development.</p> <p>See also ES Noise and Air Quality Chapters.</p>
Cumulative Impact	
C4a	<p>The cumulative impact of the Proposed Development is assessed within the ES, including within Volume 2 (TVIA and Built Heritage).</p>
Part D – Public access	<p>Feasibility for public access to be provided will be considered for tall buildings as they come forward for detailed design at RMA stage.</p>

RBKC Detailed Component

London Plan Policy D9 RBKC Detailed Component compliance	
Policy D9 Part C	Assessment Outline
Visual Impacts	
C1a i, ii, iii Long, mid-range and immediate views	<p>The submitted TVA in ES Volume 2 assesses the visual impact of the Proposed Development on the surrounding townscape in long, medium and immediate view locations agreed with the RBKC and LBHF officers as part of the pre-application process.</p> <p>There would be no effects on regionally designated LVMF views.</p>

	The Hybrid Application material demonstrates that the Proposed Development complies with the London Plan and relevant guidance in terms of townscape and visual impacts given the policy recognition that the Site is suitable for Tall Buildings and their visual impacts have been minimised.
C1b – tall buildings should reinforce the spatial hierarchy of local context, aid legibility and wayfinding	<p>The height strategy has been informed by the design-led approach and a detailed understanding of site context.</p> <p>EC05 and EC06 are positioned at a central point in the masterplan. Being located adjacent to The Table, the largest open space within the masterplan, assists in providing a comfortable setting for both EC05 and EC06. Both buildings will assist with wayfinding and legibility at this important destination within the Site.</p>
C1c – exemplary architecture	Drawings for approval and DAS Volume 2: RBKC Detailed Component demonstrate that the proposed buildings within Plot EC05 and EC06 have been designed to an exemplary standard.
C1d- Account to be taken of harm to heritage assets, where harm arises public benefit must outweigh harm	The impact upon heritage assets is assessed within the ES Volume 2. As set out in the Planning Benefits section of this Statement, the Proposed Development will provide significant benefits that would outweigh identified harm.
C1e and f – World Heritage setting and Thames Policy Area	The Proposed Development would have no adverse impact upon any World Heritage Setting or Thames Policy Area.
C1g – solar glare	The Solar Glare section of the submitted Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill ES Chapter confirms no significant adverse effects will arise from the Proposed Development.
C1h – minimise light pollution	To be controlled by appropriately worded planning condition.
Functional Impact	
C2a – ensure safety of occupants	Fire Safety has been integral to development of all Detailed Buildings. A site-wide Fire Strategy is submitted with the application, and specific Gateway One Fire Statement Plan and London Plan Fire Statement have been submitted for the Detailed Component.
C2b – servicing and maintenance	See submitted Delivery and Servicing Plan.

C2c – entrance, access routes and ground floor designed to allow fir peak time use and no overcrowding;	Entrance and access routes would be located adjacent to generous public realm areas. Entrances have been designed to be legible and easily accessible.
C2d – public transport capacity, walking and cycling networks	See submitted Transport Assessment. The Site benefits from an excellent PTAL (6a). The Proposed Development would significantly enhance local walking and cycling connections within the wider area (east-west and north-south) The RBKC Detailed Component would provide cycle parking and associated facilities in line with London Plan standards.
C2F – jobs, services and economic activity and regeneration potential should inform the design to maximise these benefits and role of development as a catalyst for change	The RBKC Detailed Component provides non-residential floorspace, including food and beverage, workspace and nursery uses. This variety of uses will add vitality and vibrancy to the Site and deliver significant economic benefits including new jobs.
C2g – buildings should not interfere with aviation, navigation or telecommunication;	This is assessed in the Telecommunications Impact Assessment and the Aviation Impact Assessment within ES Appendix 2.
Environmental Impact	
C3a – wind, daylight sunlight and overheating must be considered;	As part of the design-led response wind, daylight and sunlight and overheating considerations at the Site were established from the outset and have since informed the evolution of the Proposed Development. Please see ES Wind and Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill Chapters, as well as the internal Daylight, Sunlight and Overshadowing Report submitted in relation to the RBKC Detailed Component.
C3b and c -noise and air quality	See submitted DAS Volume 2: RBKC Detailed Component and ES Noise and Air Quality Chapters.

Cumulative Impact	
C4a	The cumulative impact of the Proposed Development is assessed within the ES.
Part D – Public access	<p>Opportunities for public roof terraces are mostly located in larger commercial buildings which form part of the Outline Component and are subject to RMA.</p> <p>EC05 and EC06 are residential-led developments that are set within the Warwick Crescent Character Area – a residential street character and therefore public access would not be in keeping with this character.</p>

LBHF Detailed Component

London Plan Policy D9 LBHF Detailed Component compliance	
Policy D9 Part C	Assessment Outline
Visual Impacts	
C1a i, ii, iii Long, mid-range and immediate views	<p>The submitted TVA in ES Volume 2 assesses the visual impact of the Proposed Development on the surrounding townscape in long, medium and immediate view locations agreed with the RBKC and LBHF officers as part of the pre-application process.</p> <p>There would be no effects on regionally designated LVMF views.</p> <p>The Hybrid Application material demonstrates that the Proposed Development complies with the London Plan and relevant guidance in terms of townscape and visual impacts given the policy recognition that the Site is suitable for Tall Buildings and their visual impacts have been minimised.</p>
C1b – tall buildings should reinforce the spatial hierarchy of local context, aid legibility and wayfinding	<p>The height strategy has been informed by the masterplan design-led approach and a detailed understanding of site character and context.</p> <p>WB03 and WB04, the tallest buildings within the Proposed Development, would be located close to the existing 31-storey Empress State Building, to the west and north of a new open space (The Table), at the crossing of new east-west and north-south routes, marking this as a new destination and crossing point between RBKC and LBHF.</p>

	<p>The tall building cluster would have a single taller focal point on Plot WB04.</p> <p>WB03 and WB04 would visibly signal the transformation of the long-underused brownfield site of the former exhibition centres and mark the new east-west and north-south routes through the Proposed Development, The Table and destination cultural uses within the Proposed Development.</p>
C1c – exemplary architecture	Drawings for approval and DAS Volume 3: LBHF Detailed Component demonstrate that the proposed buildings contained within Plots WB03, WB04 and WB05 have been designed to an exemplary standard.
C1d- Account to be taken of harm to heritage assets, where harm arises public benefit must outweigh harm	The impact upon heritage assets is assessed within the ES Volume 2. As set out in the Planning Benefits section of this Statement, the Proposed Development will provide significant benefits that would outweigh identified harm.
C1e and f – World Heritage setting and Thames Policy Area	The Proposed Development would have no adverse impact upon any World Heritage Setting or Thames Policy Area.
C1g – solar glare	The Solar Glare section of the submitted Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill ES Chapter confirms no significant adverse effects will arise from the Proposed Development.
C1h – minimise light pollution	To be controlled by appropriately worded planning condition.
Functional Impact	
C2a – ensure safety of occupants	Fire Safety has been integral to development of all Detail Component buildings. A site-wide Fire Strategy is submitted with the application, and specific Gateway One Fire Statement Plan and London Plan Fire Statements have been submitted dealing with WB03, WB04 and WB05.
C2b – servicing and maintenance	See submitted Delivery and Servicing Plan.
C2c – entrance, access routes and ground floor designed to allow for peak time use and no overcrowding;	Entrance and access routes would be located adjacent to generous public realm area facing The Boulevard or Aisgill Gardens. In the case of WB05, entrances to buildings T1 and T2 are from the communal courtyard.

	<p>Drop off for residents and their visitors is now also provided within the service area of the podium.</p> <p>All entrances are generous, tenure blind, accessible and easily identifiable.</p>
<p>C2d – public transport capacity, walking and cycling networks</p>	<p>See submitted Transport Assessment. The Site benefits from an excellent PTAL (6a).</p> <p>The LBHF Detailed Component would provide cycle parking and associated facilities in line with London Plan standards.</p>
<p>C2F –jobs, services and economic activity and regeneration potential should inform the design to maximise these benefits and role of development as a catalyst for change</p>	<p>The LBHF Detailed Component provides a significant quantum of non-residential floorspace, including retail, food and beverage, leisure, cultural and community uses.</p> <p>This variety of uses will add vitality and vibrancy to the site and deliver significant economic benefits including new jobs.</p>
<p>C2g – buildings should not interfere with aviation, navigation or telecommunication;</p>	<p>This is assessed in the Telecommunications Impact Assessment and the Aviation Impact Assessment within ES Appendix 2.</p>
<p>Environmental Impact</p>	
<p>C3a – wind, daylight sunlight and overheating must be considered;</p>	<p>As part of the design-led response wind, daylight/sunlight, overshadowing and overheating considerations were established from the outset and have since informed the evolution of each of the buildings through continued testing throughout the design process.</p> <p>See submitted ES Wind and Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill Chapters, as well as the internal Daylight, Sunlight and Overshadowing Report submitted in relation to the LBHF Detailed Component.</p>
<p>C3b and c -noise and air quality</p>	<p>As part of the design-led response noise and air quality consideration at the Site were established from the outset and have since informed the evolution of each of the buildings.</p> <p>See submitted DAS Volume 3: LBHF Detailed Component and ES Noise and Air Quality Chapters.</p>

Cumulative Impact	
C4a	The cumulative impact of the Proposed Development is assessed within the ES Volume 2.
Part D – Public access	<p>Opportunities for public roof terraces are mostly located in larger commercial buildings within the Outline Component and will be subject to future RMA.</p> <p>The top accessible floors of WB03 provide external terraces that can be utilised by all students within the building.</p> <p>The top accessible floor of WB04 will provide residents of the building with two double-height amenity spaces connected by viewing platforms around the core. The temperate green landscaped conservatory is designed as part of the amenity, and when considered with the terraces and lounge space, it provides 360-degree views across London. This space could be accessible to the public as part of the Open House initiative.</p> <p>WB05 includes the community space at ground floor that will be publicly accessible. WB05 would also include public toilets.</p>

LBHF Local Plan Policy DC3 Compliance

LBHF Local Plan Policy DC3 states that *“In areas identified as potentially appropriate for tall buildings, such as the subject Site, any proposal will need to demonstrate that it:”*

LBHF Local Plan Policy DC3 compliance	
DC3 Requirement	Assessment Outline
a. has a positive relationship to the surrounding townscape context in terms of scale, streetscape and built form	The relationship between the proposed tall buildings and the surrounding context has been fully considered. See DAS Volume 3: LBHF Detailed Component.
b. is of the highest quality of architectural design and materials with an appropriate	As set out on the Proposed Elevations and within the DAS Volume 3: LBHF Detailed Component, high quality materials are proposed for all Detailed Plots.

<p>form and silhouette which contributes positively to the built heritage and image of the borough;</p>	
<p>c. has an acceptable impact on the skyline, and views from and to open spaces, the riverside and waterways and other locally important views and prospects</p>	<p>The submitted ES Volume 2 assesses the visual impact of the LBHF Detailed Component through viewpoints agreed with LBHF officers as part of the pre-application process.</p> <p>There would be no effects on regionally designated LVMF views.</p>
<p>d. has had full regard to the significance of heritage assets including the setting of, and views to and from, such assets, has no unacceptable harmful impacts, and should comply with Historic England guidance on tall buildings</p>	<p>The submitted ES Volume 2 assesses the impact of the LBHF Detailed Component on surrounding heritage receptors.</p> <p>Chapter 9 of this statement demonstrates that the significant package of public benefits that will result from the Proposed development will outweigh identified harm.</p>
<p>e. is supported by appropriate transport infrastructure</p>	<p>The Proposed Development includes appropriate transport infrastructure. See submitted Transport Assessment for further information.</p>
<p>f. has an appropriate design at the base of the tall building and provides ground floor activity;</p>	<p>See submitted DAS Volume 3: LBHF Detailed Component.</p>
<p>g. interacts positively to the public realm and contributes to the permeability of the area</p>	<p>See submitted DAS Volume 3: LBHF Detailed Component.</p>
<p>h. is of a sustainable design and construction, including minimising energy use and the risk of overheating through passive design measures, and the design allows for adaptation of the space</p>	<p>See submitted DAS Volume 3: LBHF Detailed Component and the Sustainability Statement for Plots WB03, WB04 and WB05.</p>
<p>i. does not have a detrimental impact on the local environment in terms of microclimate, overshadowing, light spillage and vehicle movements</p>	<p>Environmental testing has informed the evolution of the proposals throughout the design process.</p> <p>See submitted DAS Volume 3: LBHF Detailed Component.</p>

	<p>Overshadowing, Solar Glare and Light Spill Chapters, as well as the internal Daylight, Sunlight and Overshadowing Report submitted in relation to the LBHF Detailed Component.</p> <p>The Proposed Development only provides blue badge parking and servicing will be managed (see also submitted Delivery and Servicing Report).</p>
j. respects the principles of accessible and inclusive design	See submitted DAS Volume 3: LBHF Detailed Component.

Thank you

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