

Hammersmith & Fulham Council
 Town Hall
 King Street
 Hammersmith
 London
 W6 9JU

Re: EARLS COURT PROPOSED AMENDMENTS TO APPLICATIONS 2 AS A RESULT OF A REALLOCATION OF 64 INTERMEDIATE RESIDENTIAL UNITS FROM APPLICATION 2 (ref. 2011/02001/OUT) TO APPLICATION 1 (ref. PP/11/01937)

Dear John,

EC Properties Limited (the 'Applicant') has recently submitted a Housing Statement Addendum (February 2013) to London Borough of Hammersmith and Fulham ('LBHF' or the 'Council') in relation to Earls Court Application 2 (ref. 2011/02001/OUT). You have requested that the Applicant provide information in order that the Council can ascertain the nature of any implications on the submitted June 2011 Environmental Statement and January 2012 Addendum to the Environmental Statement in support of Application 2 (and the interrelated Application 1 as submitted to the Royal Borough of Kensington and Chelsea, ref. PP/11/01937).

This letter has been prepared by URS, on behalf of the Applicant, and sets out the implications on the Environmental Statement as a result of the following (as detailed in the Housing Statement Addendum, February 2013):

- Reducing the number of net additional affordable intermediate tenure units within Application 2 from 740 to 676 (i.e. apportioning the difference of 64 to Application 1);
- Reducing the amount of market housing units within Application 1 from 930 to 866 (i.e. converting 64 market units to affordable intermediate tenure units); and
- Altering the balance of market housing floorspace and intermediate housing floorspace accordingly.

The amount (both units and floorspace) of affordable housing proposed site-wide (i.e. combination of Application 1 and Application 2) remains unchanged.

URS has reviewed the implications on the submitted Environmental Statement and Addendum to the Environmental Statement and the results of this review are presented below:

Chapter of June 2011 ES and January 2012 ES Addendum	Review of the implications of the reallocation of 64 intermediate units from Application 2 (LBHF) to Application 1 (RBKC)
1. Introduction to the ES A1. Introduction to the ES Addendum	With the exception of textural changes that would be required to align the area schedules and unit numbers with the amendments, the reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not have any affect on the information presented within these chapters of the Planning Application 2 ES and ES Addendum. The changes to the area schedules and unit numbers have no affect on the assessment methodology or scope.
2. EIA Methodology A2. EIA Addendum Methodology	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not affect the methodology applied to the EIA, the criteria used to define the significance of impacts or the structure of the ES and ES Addendum submitted in support of Planning Application 2.
3. Alternatives & Design Evolution A3. Alternatives & Design	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 has come about through discussion with

Chapter of June 2011 ES and January 2012 ES Addendum	Review of the implications of the reallocation of 64 intermediate units from Application 2 (LBHF) to Application 1 (RBKC)
Evolution	the LBHF and RBKC officers. Although a further design evolution, this does not affect, supersede, or render invalid the key design items and principles discussed and presented within chapter 3 and A3 of the ES and ES Addendum respectively. The information and resulting assessment therefore remains valid and applicable to Planning Application 2.
4. The Earls Court Development Proposals A4. The Design Changes	With the exception of textural changes required to align the area and residential unit schedules presented, the reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not have any affect on the information presented within these chapters of the ES and ES Addendum submitted in support of Planning Application 2.
5. Deconstruction, Demolition and Construction A5. Deconstruction, Demolition and Construction	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not affect the information presented in these chapters of the ES and ES Addendum submitted in support of Planning Application 2. The assessment of the proposed works programme, methods of deconstruction, demolition and construction, potential impacts and mitigation measures all remain valid.
6. Socio-Economics A6. Socio-Economics	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 results in a small change in the estimated resident population and a consequent small change in demand for social infrastructure. The change in population is however of negligible significance (a reduction of three residents for planning application 1 and gain of two residents for planning application 2). Similarly, in relation to child yield estimates, the change in the number of children expected is negligible for both application 1 and 2 (no change to the estimated population of children aged 0-16 year for planning application 1, and five fewer children anticipated in application 2). As such, the resultant change in demand for social infrastructure items is negligible and the change in demand does not trigger additional requirements for infrastructure items over those proposed in the January 2012 ES Addendum. The assessment of residual impacts as presented within the January 2012 ES Addendum therefore remains valid and applicable.
7. Transportation & Access A7. Transportation & Access	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not result in any material differences to the modelling that has previously been undertaken to assess the impact of both Planning Applications 1 and 2. As such the resulting transport and access assessment remains valid.
8. Wind Microclimate A8. Wind Microclimate	The inclusion of affordable housing does not alter the scale and layout parameters assessed by the 2011 ES and the 2012 ES. The results and conclusions of the wind microclimate impact assessment therefore remain valid.
9. Daylight, Sunlight & Overshadowing A9. Daylight, Sunlight & Overshadowing	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the scale and layout parameters assessed by the 2011 ES and 2012 ES Addendum. The results and conclusions of the daylight, sunlight and overshadowing impact assessment therefore remain valid.
10. Electronic Interference A10. Electronic Interference	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the scale and layout parameters assessed by the 2011 ES and the 2012 ES Addendum. The results and conclusions of the electronic interference impact assessment therefore remain valid.
11. Buried Heritage Assets A11. Buried Heritage Assets	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the proposed site levels or the maximum vertical limits of deviation below ground assessed by the June 2011 ES and January 2012 ES Addendum. The results and conclusions of the buried heritage assets impact assessment therefore remain valid.

Chapter of June 2011 ES and January 2012 ES Addendum	Review of the implications of the reallocation of 64 intermediate units from Application 2 (LBHF) to Application 1 (RBKC)
12. Ground Conditions A12. Ground Conditions	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the proposed site levels or the maximum vertical limits of deviation below ground assessed by the June 2011 ES and January 2012 ES Addendum. The results and conclusions of the ground conditions impact assessment therefore remain valid.
13. Water Resources, Drainage & Flood Risk A13. Water Resources, Drainage & Flood Risk	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the proposed site levels or the maximum vertical limits of deviation below ground assessed by the June 2011 ES and January 2012 ES Addendum. In addition, the reallocation of the 64 intermediate units does not alter proposed Drainage and Surface Water Management Strategy nor alter the flood risk of the site. The results and conclusions of the water resources, drainage and flood risk impact assessment therefore remain valid.
14. Air Quality A14. Air Quality	As noted above in relation to 'Transportation & Access' (Chapter 7 and A7), the reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 will not result in any material differences to the road traffic modelling that has previously been undertaken to assess the impact of both Planning Applications.
15. Noise & Vibration A15. Noise & Vibration	As such, the impact assessment work undertaken in relation to road traffic air quality and noise & vibration impact assessments and presented within the June 2011 ES and January 2012 ES Addendum remains valid and applicable.
16. Ecology A16. Ecology	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 has no affect on the results and conclusion of the June 2011 and January 2012 ecological impact assessments.
Residual Impact Assessment & Conclusions A17. Residual Impact Assessment & Conclusions	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the residual impacts defined within the June 2011 ES and January 2012 ES Addendum. The residual impacts and overall conclusions of the EIA process therefore remain valid and applicable.
Cumulative Impact Assessment A18. Cumulative Impact Assessment	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the combined cumulative effects of individual impacts and cumulative impacts associated with the Earls Court Development Proposals and other development schemes defined within the June 2011 ES and January 2012 ES Addendum. The results and conclusions of those assessments therefore remain valid.
ES Volume II: Townscape & Visual Impact Assessment	The reallocation of 64 intermediate units from Planning Application 2 into Planning Application 1 does not alter the scale and layout parameters assessed by the 2011 EIA and the 2012 EIA Addendum. In addition, there will be no substantive difference between the appearance of market housing and that of intermediate affordable housing. The results and conclusions of the townscape and visual impact assessment therefore remain valid.

In light of the above and with the exception of textural changes that would be required to align the area and residential unit schedules presented in the ES and ES Addenda with the reallocation of the 64 intermediate units from Planning Application 2 into Planning Application 1, the amendments are not considered to have any impact on the results and conclusions of the assessment work previously submitted in support of planning applications 1 and 2. The work previously submitted therefore remains valid and applicable to the amendment on the distribution of a proportion of the intermediate housing across planning Applications 1 and 2.

Yours sincerely

URS Infrastructure & Environment Limited

Encl: Quod Housing Statement Addendum, February 2013

EARLS COURT PROJECT

HOUSING STATEMENT ADDENDUM

PLANNING APPLICATION 2 (REF. 2011/02001/OUT)

FEBRUARY 2013

1. A Housing Statement was submitted in support of applications for planning permission on behalf of EC Properties Ltd (the Applicant) for the development of the Earls Court Site in June 2011 (Application 1 in respect of RBKC (ref. PP/11/01937) and Application 2 in respect of LBHF (ref. 2011/02001/OUT)). This Addendum has been produced as an update to the June 2011 Statement.
2. The June 2011 Housing Statement describes the proposed affordable housing offer. The Valuation Office (VO) was jointly appointed in May 2011 by RBKC, LBHF and the GLA to independently review the Applicant's open book appraisals (which accompany the Applications). The VO reported and confirmed the proposed affordable housing – as set out in the June 2011 Housing Statement – represents the maximum reasonable offer.
3. On 12th September 2012, LBHF's Planning Committee resolved to grant planning permission in respect of Application 2 on the basis of the June 2011 affordable housing offer. This is reflected in the Section 106 Heads of Terms as set out in the Officer's Committee Report, summarised as:
 - The re-provision of existing housing to be secured in the form of up to 67,910 sqm GIA or up to 760 units to be provided in the Application 2 site, Seagrave Road and 11 Farm Lane, for use as replacement housing units for re-housing residents from West Kensington and Gibbs Green estates.
 - The delivery of additional affordable housing units to be secured in the form of 740 housing units (up to 57,000 sqm GIA) of an appropriate mix of 1, 2, 3 and 4 bed units, constructed and made available for use as intermediate affordable housing within the Application 2 site, subject to nomination and apportionment agreements between LBHF and RBKC.
4. As discussions progressed with both authorities, post-LBHF Planning Committee, it became evident that the Applicant's proposal to provide nominations to a proportion of the new 740 intermediate homes proposed within Application 2 would not be acceptable to RBKC. The Applicant was asked to consider allocating a proportion of 740 units within the boundary of Application 1, rather than within Application 2. This has been achieved by:
 - Reducing the number of net additional affordable intermediate tenure units within Application 2 from 740 to 676 (i.e. apportioning the difference of 64 to Application 1);
 - Reducing the amount of market housing units within Application 1 from 930 to 866 (i.e. converting 64 market units to affordable intermediate tenure units).

- Altering the balance of market housing floorspace and intermediate housing floorspace.
5. The 64 units to be provided within Application 1 are to be provided as intermediate tenure homes comprising 40% 1 beds and 60% 2 beds and will comprise a maximum affordable residential floorspace to be provided of 3,681 sqm (GIA) across two Development Plots (WV01 and WK04). The proposals are acceptable to RBKC: their Major Planning Development Committee resolved to grant planning permission on this basis on 20th November 2012.
6. In terms of the implications on LBHF (Application 2):
- There is no change to the overall quantum of residential floorspace in Application 2.
 - There is no reduction in the amount (floorspace and units) or type of affordable housing delivered scheme-wide (i.e. the combination of Application 1 and 2).
 - There is an amendment to the distribution of the new intermediate homes with 64 of these homes being delivered within the boundary of Application 1, but this does not impact nominations available to LBHF as it was originally an accepted principle that there would be an apportionment of nominations between LBHF and RBKC irrespective of where the new homes were located.
 - The number of market units able to be delivered within Application 2 increases from 4,345 to 4,409 units.
 - The number of net additional intermediate tenure affordable homes delivered within Application 2 reduces from 740 to 676 units.
 - As a result of the above, the maximum intermediate housing floorspace within Application 2 has decreased from 57,000 sqm (GIA) to 53,319sqm (GIA).
 - There is no impact on the re-provision of existing homes on Gibbs Green and West Kensington Estates.
7. **For the avoidance of doubt, the amount (both units and floorspace) of affordable housing proposed site-wide (i.e. combination of Application 1 and Application 2) remains unchanged.**

Quod

February 2013