

# Seagrave Road

## Planning Application Amendments

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### Updated Planning Statement

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Prepared for EC Properties Ltd  
by DP9

November 2011



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Appendix 1: Planning Obligations

## 1.0 EXECUTIVE SUMMARY

- 1.1 This Updated Planning Statement is submitted in support of an application for detailed planning permission on behalf of EC Properties Limited for the development of the Seagrave Road car park Site (the “Application Site”), London, SW6.
- 1.2 The Site is approximately 3 hectares (Ha) in size and is located in the London Borough of Hammersmith & Fulham (LBHF). The railway line to the east of the Site constitutes the administrative boundary between LBHF and the Royal Borough of Kensington & Chelsea (RBKC).
- 1.3 The original planning application was submitted in June 2011 (LPA Reference: 2011/02000/FUL). As a result of feedback received following submission of the application, a number of changes to the submitted scheme are now proposed. The proposed changes are summarised in Section 4 of this report.
- 1.4 This Updated Planning Statement supersedes the Planning Statement included as part of our original submission in June 2011.
- 1.5 The description of development for the Application is as follows:
- Demolition of all existing buildings and the development of 808 residential units comprising; 8 residential blocks (Blocks A-H) ranging from 4 to 16 storeys (C3); 30 residential town houses (C3), a gym facility with associated café (D2) in addition to landscaping, plant, parking, servicing and new access arrangements.*
- 1.6 This Statement demonstrates the overall planning case in support of the Proposed Development (including any amendments), and cross refers to other supporting documents submitted with the Application including an Environmental Impact Assessment.
- 1.7 Two separate outline planning applications were also submitted by EC Properties Ltd. for the wider Earls Court Site in June 2011. Together these comprise the majority of the Earls Court & West Kensington Opportunity Area (ECWKOA).
- 1.8 Planning Application 1 was submitted to the Royal Borough of Kensington and Chelsea (RBKC) (LPA Ref: PP/11/01937) and relates to land entirely within RBKC,

and Planning Application 2 was submitted to the London Borough of Hammersmith and Fulham and RBKC. Planning Application 2 (LPA Ref: 2011/02001/OUT): relates almost entirely to land within LBHF, but also includes an area of land within RBKC; together these applications form the ‘Earls Court Scheme’.

- 1.9 Together these two applications provide for comprehensive redevelopment of the Earls Court Site. Both applications respond to the significant regeneration potential of the ECWKO A, with Application 2 including the re-provision of the existing Gibbs Green and West Kensington estates. These estates are identified by LBHF, in their Core Strategy and draft ECWKO A SPD, as a regeneration priority. The development proposals for Seagrave Road are important to enabling the first phase of the estate relocation process and are specifically identified for this purpose in Earls Court Site planning applications. In the event that estate regeneration does not proceed, the Site will be delivered on a stand alone basis.
- 1.10 In order to appraise the specific impacts of the Proposed Development, the planning application assumes a base case scenario where the wider Earls Court Development Option (Site Wide) does not occur. This base case assumes Earls Court Exhibition Centre (“EC”) may remain open.
- 1.11 The option to provide replacement homes for residents of the Gibbs Green and West Kensington estates in the event that the wider Earls Courts site scheme proceeds is contemplated within the cumulative assessments (refer to Volume 1, Chapter 2 of the EIA for a more detailed description of methodology).
- 1.12 Throughout the past year the form of the Proposed Development and specific technical issues have been discussed with officers at LBHF, RBKC, the Greater London Authority (GLA) and other key consultees. The form and content of the Proposed Development has evolved as a result of discussions held with the above mentioned officers and stakeholder groups.
- 1.13 The statutory development plan for the Site comprises the adopted London Plan (2011) and the recently adopted LBHF Core Strategy in addition to any saved Unitary Development Plan (UDP) (2007) policies.
- 1.14 The RBKC, LBHF and GLA are currently preparing a Planning Framework for the

Earls Court and West Kensington Opportunity Area, within which the Seagrave Road Site is located, in the form of the Earls Court and West Kensington Opportunity Area SPD (ECWKOA). A draft SPD was issued for public consultation in March 2011, and we understand a revised draft will be published for consultation purposes in November 2011. Adoption of the final SPD is envisaged early in 2012.

- 1.15 This Planning Statement has assessed the Proposed Development (as amended) against the Development Plan and other relevant planning policy and guidance at national, regional and local policy level.
- 1.16 The Proposed Development will bring about strategic change and growth of a substantial brownfield site. It will deliver significant planning benefits, including many new homes.
- 1.17 The Planning Statement describes the wide-ranging planning benefits of the Proposed Development and demonstrates that it accords with both adopted and emerging planning policy and guidance.
- 1.18 The Proposed Development will result in:
  - The delivery of 808 new homes.
  - A catalyst for the comprehensive regeneration of the West Kensington and Gibbs Green housing estates should the wider Earls Court Development Option (Site Wide) occur.
  - The provision of a network of open space.
  - The optimisation of site potential and density.
  - The delivery of high quality sustainable design.
- 1.19 The Viability Assessment submitted as part of the planning application demonstrates that, in the base case scenario, the maximum reasonable affordable housing that the Proposed Development can support is 25% intermediate housing. This equates to 200 units which would be located in Block D in the southern part of the site.

- 1.20 In the event that the Earls Court Development Option (Site Wide) does come forward, the Proposed Development will provide the 200 units in Block D as social rented units in order to enable the first stage of estates regeneration which will in turn enable the comprehensive regeneration of the Earls Court Site to commence. The viability position of the scheme is such that it is not financially viable to provide any additional affordable housing beyond this level of provision.
- 1.21 The approach to the height, bulk and mass of the Proposed Development has been the subject of detailed Townscape and Visual Impact Assessment. With the overall conclusion that the Proposed Development is acceptable in terms of its visual impact on the existing local environment.
- 1.22 The likely impacts of the Proposed Development have been fully assessed in the Environmental Statement and the other planning application documents. The outcome of this analysis demonstrates that the Proposed Development is appropriate and will serve to deliver benefits that will regenerate and enhance the Seagrave Road Site, the ECWKOA and the wider surrounding area.

## 2.0 INTRODUCTION

2.1 This Updated Planning Statement is submitted in support of an application (“Application”) for detailed planning permission on behalf of EC Properties Limited (“the Applicant) for the development of the Seagrave Road car park, London, SW6 (“the Site”). The red line boundary for the Site is shown below in figure 1:

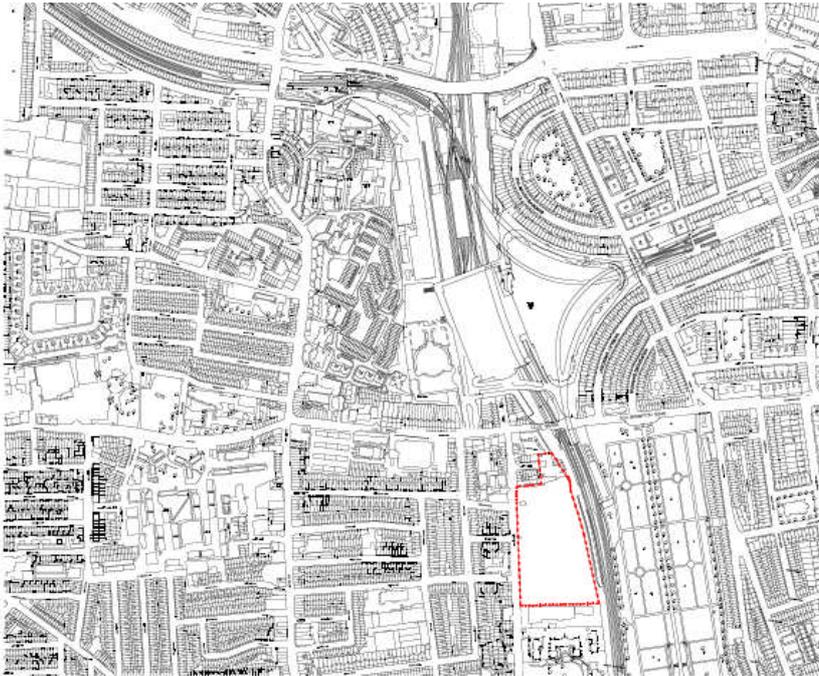


Figure 1 – Planning Seagrave Road Site boundary

2.2 The planning application was originally submitted on 22 June 2011 (LPA Ref: 2011/02000/FUL). As a result of feedback received following submission of the application, a number of changes to the submitted scheme are now proposed. The proposed changes are summarised in Section 4 of this report.

2.3 An Environmental Impact Assessment (“EIA”) has been formally scoped and subsequently undertaken in line with the Town and Country Planning (Environmental Impact Assessment Regulations) 1999 (as amended). Since the submission of the planning application and the associated ES, the EIA Regulations have been replaced (24 August 2011) by the 2011 EIA Regulations. However, as discussed with LBHF, the 1999 EIA Regulations (as amended) should apply because the submission date of this application is prior to the 2011 Regulations coming into force (see Regulation 65).

2.4 The original planning application submission comprised the following documents:

- Environmental Statement Non-Technical Summary (NTS);
- Environmental Statement Volume I: Environmental Statement;
- Environmental Statement Volume II: Townscape and Visual Impact Assessment (incorporating PPS5 Heritage Assessment); and
- Environmental Statement Volume III: Technical Appendices.
- Application Forms including Certificate B (DP9 Planning Consultants);
- Site Location Plan at 1:1250 (John McAslan and Partners);
- Planning Application Drawings: Existing and Proposed (John McAslan and Partners and Paul Davis & Partners);
- Design and Access Statement (including Landscape Strategy) (John McAslan and Partners, Paul Davis & Partners and Patel Taylor);
- Sustainability Strategy (Beyond Green);
- Energy Strategy, including Code for Sustainable Homes Pre-assessment (Hoare Lea);
- Statement of Community Involvement (George Cochrane Associates and Ciaran Quigley Associates).

2.5 The following documents form part of this submission and supersede the original versions that formed part of our original planning application submission:

- Updated List of Planning Application Drawings (Planning Application Form Schedule 2);
- Updated Schedule of Residential Accommodation (Planning Application Form Schedule 3);
- Updated Planning Application Drawings (John McAslan & Partners and Paul Davis & Partners); and
- Updated Planning Statement (DP9).

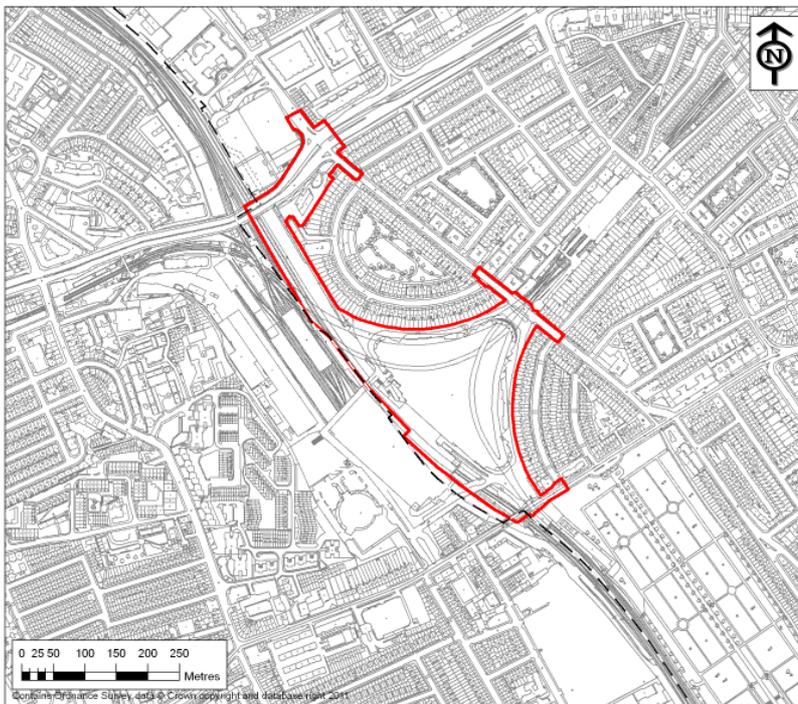
2.6 The following Addendum documents also form part of this submission and should be read in conjunction with the respective documents that formed part of our original submission:

- Design & Access Statement Addendum (John McAslan & Partners);
- Transport Assessment Addendum (WSP);
- Housing Statement Addendum (Quod)

- Environmental Statement Volume 1 Addendum (URS); and
- Environmental Statement Volume 2 Townscape & Visual Impact Assessment Addendum (Professor Robert Tavernor Consultancy)..

2.7 The Updated Planning Statement cross refers to relevant sections in the Original Environmental Statement, Environmental Statement Addendum and other supporting documents.

2.4 Two separate outline planning applications were submitted by EC Properties Ltd. for the Earls Court Site on 22 June 2011. Together these comprise the majority of the Earls Court & West Kensington Opportunity Area (ECWKO). Planning Application 1 was submitted to the Royal Borough of Kensington and Chelsea (RBKC) (LPA Ref: PP/11/01937), and Planning Application 2 (LPA Ref: 2011/02001/OUT) was submitted to the London Borough of Hammersmith and Fulham (LBHF) and RBKC. Planning Application 2: relates almost entirely to land within LBHF, but also includes an area of land within RBKC; together these applications form the ‘Earls Court Scheme’. The red line boundary for each planning application is shown overleaf.



**Figure 2 – Planning Application 1 site boundary**

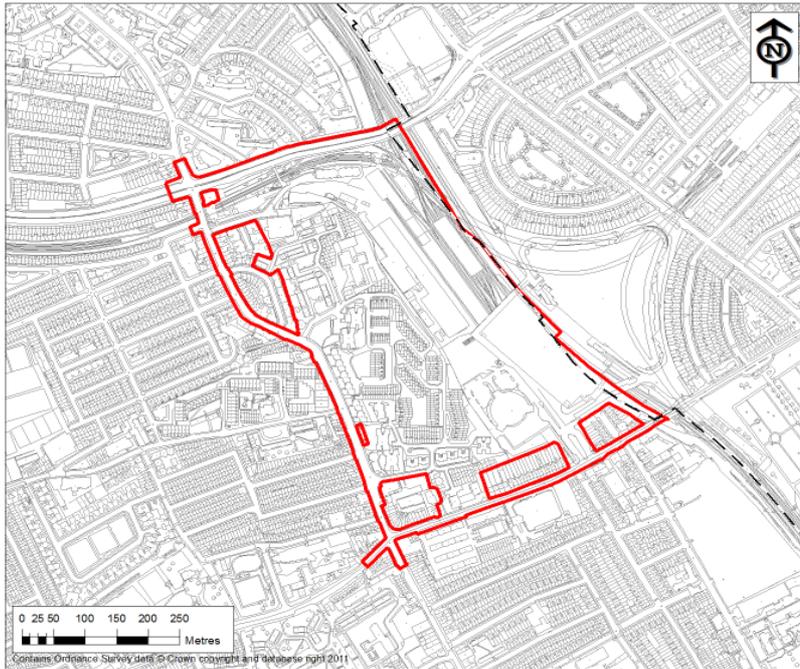


Figure 3 – Planning Application 2 site boundary

2.5 The following terminology is used throughout this document:

<b>Identification of the Development Sites</b>	
Seagrave Road Site	Land known as the Seagrave Road Carp Park, London SW6
Proposed Development	The redevelopment of the Seagrave Road Site comprising this application.
The Earls Court Site	Land comprising the Earls Court Exhibition Centres 1 and 2 and surrounding land as shown in figures 2 and 3 which is the subject of separate outline planning applications to both RBKC and LBHF.
Earls Court Masterplan	The Illustrative Masterplan for the Earls Court Site and Seagrave Road Site.
Earls Court Development Option (Site Wide)	The proposed redevelopment of the Earls Court Site as described in Planning Applications 1 and 2.

<b>Identification of the Planning Applications</b>	
Application	Seagrave Road detailed application.
EC Planning Application 1	The Outline Planning Application for the RBKC part of the Earls Court Site.
EC Planning Application 2	The Outline Planning Application for the LBHF and RBKC part of the Earls Court Site.

### **Consultation**

- 2.6 In October 2009, the Applicant determined clear overarching aims for the community engagement process. These included:
- Engage all in the community;
  - To be transparent;
  - To be key to the development process;
  - To create and maintain momentum;
  - Listen to and understand the community;
  - Be innovative and set new standards for public consultation; and
  - Deliver meaningful feedback.
- 2.7 Throughout the past year the form of the Proposed Development and specific technical issues have been discussed with officers at LBHF and RBKC, and the Greater London Authority (GLA). Detailed discussions have also taken place with Transport for London (TfL), London Underground Limited (LUL), Borough Highway officers and other relevant groups.
- 2.8 A full public consultation programme has been undertaken to gain the views of local residents and interested parties in relation to the Proposed Development of the Site.
- 2.9 This public consultation programme was a joint programme which also encompassed the Earls Court scheme.
- 2.10 The form and content of the scheme has evolved as a result of discussions held with the above mentioned officers, residents and stakeholder groups.

2.11 Full details of the public consultation programme are contained within the Statement of Community Involvement submitted with this application.

2.12 Key elements of the consultation process are summarised below:

- The first stage of the community engagement programme took place from October to December 2009 and involved meeting community organisations and leaders, introducing the Seagrave Road and Earls Court Scheme team and explaining how local residents could be involved in the masterplanning process.
- The second stage of the programme was a series of seven drop-in sessions held in February and March 2010 which were designed to open up the dialogue to the wider community, explain the vision for the Earls Court and West Kensington Opportunity Area and understand the concerns and aspirations of individuals.
- The third stage of the programme took place in July 2010 and took the form of two public drop-in sessions that concentrated on the Earls Court Masterplan process, addressing the proposed creation of a new urban neighbourhood.
- The fourth stage phase of the community engagement programme consisted of 2 drop-in sessions that took place on 10th and 16th November 2010 and concentrated on the Earls Court Masterplan concept.

2.13 A public exhibition for the Proposed Development and the Earls Court Scheme took place on the 18th, 19th, 21st and 22nd of March 2011 at the Earls Court Exhibition Centre.

2.14 The public exhibition was attended by 701 people. An additional 300 people attended stakeholder and other events held to view the public exhibition.

2.15 Overall feedback from this exhibition was positive of the masterplan with the majority expressing support for the Proposed Development and the Earls Court scheme. A summary of the feedback from the exhibition is contained within the Statement of Community Involvement. An overview of this feedback is set out below:

- There was support for the Proposed Development, including from some residents of the Gibbs Green and West Kensington estates;

- Several estate residents raised concern over the housing proposed and felt that the new housing did not constitute an improvement on what they currently occupy;
- A mix of opinions were raised on the style of architecture; the proposed heights of some of the buildings caused concern, but there was support for the proposed houses and lower buildings being located to the western side of the development;
- Some concern was expressed over the proposed residential density for the site;
- Questions were raised about traffic and parking proposals in particular in relation to surrounding streets towards North End Road and the junction with Lillie Road;
- The houses along Seagrave Road were well received by existing residents of Seagrave Road; it was felt that they responded to the existing scale of the street;
- Concern was raised about the impact of construction traffic along Seagrave Road;
- There was support for the provision of open space within the site and support for the potential connectivity with the Lost River Park;
- Concerns were raised over the impact of the additional people which would arise from the Proposed Development and their impact on the area in particular in relation to traffic / facilities / access and services required to support the residents;
- There was a view that for the number of residents there would be inadequate open space provision. The potentially adverse impact of the Proposed Development on Brompton Cemetery was also raised.

2.16 A further public exhibition for both the Seagrave Road Proposed Development and the Earls Court Scheme was held on the 9th, 10th and 11th June 2011. This was attended by 407 people.

2.17 A summary of the feedback from the exhibition is contained within the Statement of Community Engagement. An overview of this feedback relating to the Proposed Development is set out below:

- The majority of people saw considerable benefit in the Proposed Development and felt that there would be a positive impact to the area.

- The role that open space plays in the arrangement of the Site was supported and the exhibition did allay many fears about the potential public benefit of the Proposed Development.
- The majority of residents from the West Kensington and Gibbs Green that attended the exhibition were positive about the design and layout of the scheme and the proposed replacement affordable homes.
- The principal issue raised related to the massing and quantum of the Proposed Development, with some feeling that the Proposed Development was an overdevelopment of the Site. The reason given was that the scale of the buildings was not in keeping with the surrounding Victorian residential neighbourhood.
- There was support for the 3 and 4 storey housing along Seagrave Road and it was agreed that this would retain the feel of the street as a low scale residential area.
- There was much discussion about the architecture and many different views about whether the style of modern architecture proposed was appropriate for the area. Opinions on the merits of the architectural style were mixed.

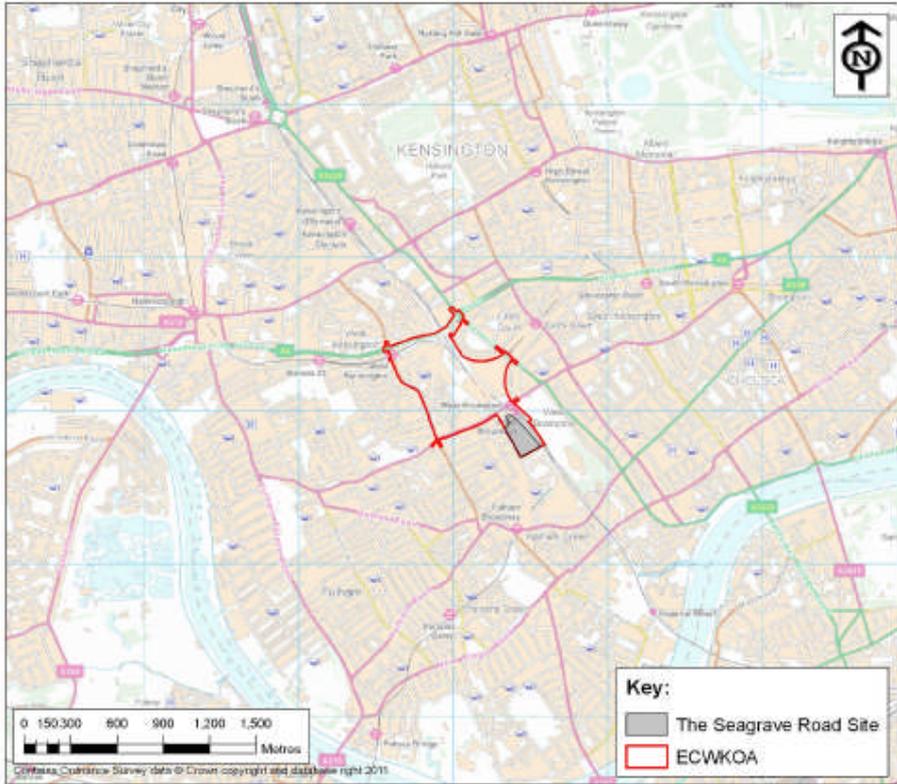
2.18 The purpose of this Planning Statement is to provide an overview of the Proposed Development and to carry out an assessment of the Proposed Development against the Development Plan and other relevant planning policy guidance. The Statement is structured in the following way:

- Description of the Site and Surrounding Area;
- The Development Proposals;
- Planning Policy Framework;
- Planning Considerations; and
- Summary and Conclusions.

**3.0 THE SITE AND SURROUNDING AREA**

3.1 The Application Site is approximately 3 hectares (Ha) in size and is bounded by commercial buildings along Roxby Place to the north, London Ambulance Service buildings to the south, Brompton Cemetery to the east (on the far side of the rail lines), and houses along Seagrave Road to the west. The Site lies within the London Borough of Hammersmith and Fulham (LBHF). The railway line to the east constitutes the administrative boundary between LBHF and RBKC.

3.2 The Site is located within the Earls Court and West Kensington Opportunity Area (ECWKO), as defined in the London Plan (2011). The site location is illustrated within Figure 4 below:



**Figure 4 – Site location and boundary of the Earls Court and West Kensington Opportunity Area**

3.3 The Site is identified within the ECKWOA as a reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development.

3.4 The Site is currently occupied by a hard surfaced car park with 1,070 spaces which is

used to provide parking for the Earls Court Exhibition Centres. In addition, a number of buildings, comprising part of Roxby Place, are located in the north east corner of the Site.

- 3.5 An established residential area lies to the west of Seagrave Road, and the London Oratory School is located approximately 250 metres to the south. Lillie Road is located 150 metres to the north of the Site and comprises a small number of retail and residential units. Seagrave Road itself is a non-through road at its southern end.
- 3.6 The Earls Court Exhibition Centres lie north of the Site, less than 5 minutes walk away; and Stamford Bridge Stadium lies approximately 5 minutes walk to the south.
- 3.7 The strip of green space which lies between the Site and the railway line to the east is inaccessible.

### **Accessibility**

- 3.8 The Site is publicly accessible with a maximum PTAL rating of 6a ('excellent') at its northern end down to a minimum of 3 ('moderate') at its southern edge. It is located within five minutes walking distance of West Brompton underground station which provide District line services. West Brompton station also provides London Overground and Southern train services from Kensington Olympia, Clapham Junction, East Croydon, Watford Junction, Willesden Junction and Stratford.
- 3.9 Earls Court and Fulham Broadway stations are also located within 10 minutes walk from the Site and provide district and district and Piccadilly line services respectively.
- 3.10 In addition there are seven bus stops within 640m (less than 10 minutes walking distance) of the northern end of the Site. These are served by bus routes providing a high frequency service with onward connections with central and west London destinations plus other public transport interchanges.
- 3.11 Cycle parking in the area is limited to small clusters. 3 to 4 stands are located along Earls Court Road, at the junctions of Penywern Road and Old Brompton Road/Redcliffe Gardens. A similar level is provided along Warwick Road, with Sheffield stands provided at both junctions with Nevern Square. More cycle parking is located along the northern end of North End Road. Further south towards the Lillie Road

junction, however there is less cycle parking available.

- 3.12 The Site is on the western fringe of the Barclays Cycle Hire scheme, with an existing station located on Warwick Road.
- 3.13 The current accessibility of the Site is described in further detail within the accompanying Transport Assessment prepared by WSP.

### **Heritage Context**

- 3.14 The Site is not located within a Conservation Area; however, over the railway line beyond the eastern boundary of the Site lies the Brompton Cemetery which is located within the Brompton Cemetery Conservation Area. The Cemetery is now managed by the Royal Parks Agency, and falls within RBKC. The main entrance to the Cemetery is through a Grade II\* listed triumphal arch from Old Brompton Road at the northern end of the Cemetery. The chapel and arcades are separately Grade II\* listed. The Cemetery contains a number of fine monuments, seven of which are listed Grade II.
- 3.15 To the west a short distance away is the Sedlescombe Conservation Area, this was designated in 1981 and falls within the LBHF. The Walham Grove Conservation Area lies a little further to the south west and the Earls Court Square Conservation Area further to the north east.
- 3.16 These Conservation Areas are described in Volume II of the Environmental Statement: Townscape and Visual Impact Assessment.
- 3.17 There are a number of Listed Buildings located within the vicinity of the Site. These include:
- Brompton Cemetery: Church of England Chapel, arcades forming NE quarter and NW quarter of the Circle and Avenue, entrance gates and screen on Old Brompton Road (Grade II\*), and various monuments, (Grade II);
  - Church of St Luke, Redcliffe Square (Grade II);
  - Church of St Mary, The Boltons (Grade II);
  - The Boltons nos. 1-2, 3-4, 5-6, 7-8, 9-10, 11-12, 13-14, 15, 16-17, 18-19, 20-21, 22-23, 24-25, 26-27, 28 (Grade II);
  - 62-68 Lillie Rd (Grade II);

- 282 North End Road (Grade II);
- Fulham Baths entrance block North End Road (Grade II); and
- Church of St John Walham Green (Grade II).

3.18 The Brompton Cemetery is also designated Grade I in English Heritage's Register of Parks and Gardens of Special Historic Interest.

3.19 Volume II of the Environmental Statement: Townscape and Visual Impact Assessment, includes further details on these buildings.

3.20 The strip of green land adjacent to the Site on its eastern boundary is designated as an area of Grade I Nature Conservation Importance within the LBHF UDP and Brompton Cemetery over the railway in the RBKC is designated as Metropolitan Open Land, Open Space and Site of Nature Conservation Importance.

## Planning History

3.21 The following provides an overview of the Site's planning history where this is relevant to the Proposed Development.

Year / Planning reference number	Description of Development
1986 00715/0020/000	Former Fulham / Brompton coal yard: Change of use to provide lorry stacking facilities and carpark for the users of Earls Court  Granted 03/02/1986
1988 1987/00519/DET	Submission of details of lighting to car park in accordance with planning permission dated 2nd May 1986  Granted 06/10/1988
1988 1988/00460/FUL	Temporary use of part of Seagrave Road car park for the stabling of horses from 5th July to 1st August 1988.  Granted 18/05/1988
2006 2006/01777/FUL	Erection of 3 single-storey prefabricated buildings and their use as for vehicle marshalling purposes.  Granted 30/08/2006

3.22 Proposals to redevelop the Site were pursued by the previous owners of the Site (Steamboat Developments Group) during 2008. The proposed residential development included buildings ranging in height from 4 up to 41 storeys and was the subject of pre application discussions with LBHF and key stakeholder groups. The scheme was not

pursued through to a formal planning application submission.

- 3.23 There are no current planning applications in the surrounding area which are relevant to understanding the emerging land use and physical context of the application Site.

## 4.0 THE DEVELOPMENT PROPOSALS

4.1 The Applicant seeks detailed planning permission for the Proposed Development.

### Description of Development

4.2 The description of development for the Application is as follows:

*Demolition of all existing buildings and the development of 808 residential units comprising; 8 residential blocks (Blocks A-H) ranging from 4 to 16 storeys (C3); 30 residential town houses (C3), a gym facility with associated café (D2) in addition to landscaping, plant, parking, servicing and new access arrangements.*

### Proposed Floorspace by Land Use

4.3 The total floorspace proposed for the Application is 101,835sqm GIA and 109,240sqm GEA. Table 1 below defines the floorspace figures, for each category of land use proposed.

Land Use	Use Class	GIA (sqm)	GEA (sqm)
Block A	C3	9,903	10,925
Block B	C3	5,724	6,243
Block C	C3	18,464	19,934
Block D	C3	17,234	18,523
Block E	C3	5,223	5,609
Block F	C3	11,477	12,243
Block G	C3	4,200	4,534
Block H	C3	3,834	4,126
Seagrave Road Town Houses	C3	5,234	6,096
<b>Total residential</b>		<b>81,293</b>	<b>88,233</b>
Gym (with associated café)	D2	1,094	1,167
<b>Total leisure</b>		<b>1,094</b>	<b>1,167</b>
<b>Sub -total</b>		<b>82,387</b>	<b>89,400</b>
Ancillary (servicing, plant, parking)		19,448	19,840
<b>Total</b>		<b>101,835</b>	<b>109,240</b>

Table 1: Proposed Floorspace by Land Use

## Residential

4.4 The Application seeks planning permission for 808 residential units. This will be distributed across Blocks A – H in addition to a number of houses on the eastern side of Seagrave Road.

4.5 The unit mix range proposed for this Application is as follows:

	1 Bed	2 Bed	3 Bed	4+ Bed	4 Bed House	Penthouse	Total
<b>Private</b>							
Block A	38	42	23	0	0	0	<b>103</b>
Block B	22	25	4	0	0	2	<b>53</b>
Block C	60	104	20	0	0	4	<b>188</b>
Block E	24	18	12	0	0	2	<b>56</b>
Block F	50	45	16	0	0	0	<b>111</b>
Block G	25	12	7	0	0	0	<b>44</b>
Block H	14	7	16	0	0	0	<b>37</b>
Seagrave Rd Houses	0	0	0	0	16	0	<b>16</b>
<b>Total Private</b>	<b>233</b>	<b>253</b>	<b>98</b>	<b>0</b>	<b>16</b>	<b>8</b>	<b>608</b>
<b>Affordable</b>							
Block D	68	85	33	0	6	0	<b>192</b>
Seagrave Rd Houses	0	0	0	0	8	0	<b>8</b>
<b>Total Affordable</b>	<b>68</b>	<b>85</b>	<b>33</b>	<b>0</b>	<b>14</b>	<b>0</b>	<b>200</b>
<b>Total</b>	<b>301</b>	<b>338</b>	<b>131</b>	<b>0</b>	<b>30</b>	<b>8</b>	<b>808</b>
<b>%</b>	<b>37</b>	<b>42</b>	<b>16</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>100</b>

Table 2: Unit Mix

4.6 The Proposed Development assumes that the 200 affordable housing units will be provided as shared ownership units. However, in the event that the estate regeneration at Gibbs Green and West Kensington proceeds, the Proposed Development will provide the 200 affordable units as social rented housing.

## Leisure

- 4.7 In addition to the proposed residential units, a proposed gym facility for members incorporating an ancillary café is located within Block A with a total GEA of 1,167sqm. The entrance to the café will be at ground level, with the gym and swimming pool at lower ground level.

## Lower Ground Level

- 4.8 The total area proposed for ancillary uses including parking, servicing, plant, storage, maintenance, machinery and circulation at lower ground level is 19,840sqm (GEA).

## Proposed Amount and Distribution of Car, Motorcycle and Cycle Parking

- 4.9 The following table summarises the number of car, motorcycle and cycle parking spaces proposed on site as part of the Proposed Development:

Land Use	Car Parking					Motorcycle Parking		Cycle Parking	
	Non Disabled Parking Spaces		Disabled Parking Spaces		Total Parking Spaces	Resident	Visitor	Reside	Visitor
	Resident	Visitor	Resident	Visitor					
Ground Level	2 (car club spaces)	5	25	(the 25 disabled spaces if unused will also be available to visitors)	32				81
Basement	397	0	56	0	453	40	0	978	0
Leisure	0	0	0	0	0	0	0	0	0
<b>Total</b>	399	5	81	See above	485	40	0	978	0

Table 3: Amount and Distribution of Parking

## Open Space

- 4.10 The proposed scheme benefits from a comprehensive range of amenity space types including:

- Public and private green spaces;
- Public open space encompassing a balance of hard and soft surface areas;
- Active shared surface streets and civic open spaces with predominantly hard landscaping;
- A garden square;
- Communally accessible amenity space for residential buildings;
- Private outdoor space at grade through the provision of private rear gardens; and
- Additional private outdoor space is also provided as balconies or roof terraces.

4.11 As a result of feedback received on the original planning application submission, a number of changes to the scheme have been proposed. The changes comprise:

- A reduction in the maximum heights of Buildings B, C, E, F, G & H by lowering the roof level plant rooms;
- A reduction in the height of Building D;
- A reduction in the building footprint of Building E and subsequent creation of additional open space;
- Removal of the overhang above the top floor on Building B;
- A darker shaded elevational treatment for Building C;
- A change in the east and west façade treatment for Building D from render to stone; and
- Removal of the eastern roof terrace from Block D and its replacement with a sedum roof.

## **5.0 PLANNING POLICY FRAMEWORK OVERVIEW**

5.1 The planning policy context for the Proposed Development comprises three levels of adopted and emerging policy and guidance at national, regional and local levels. A schedule of all the relevant planning policies are included within this report as Appendix 1. The key planning policy documents taken into account at this stage and referred to in this Planning Statement include the following:

### **National Planning Policy**

5.2 At the national level, planning policy is contained within a series of Planning Policy Guidance notes (PPG) which are gradually being superseded by Planning Policy Statements (PPS). These guidance documents provide topic related advice and will be a material consideration in determining the planning application for the Proposed Development.

5.3 Planning Policy Guidance Notes and Planning Policy Statements relevant when considering the Proposed Development include:

- Planning Policy Guidance notes:
  - PPG13: Transport (April 2001), with alterations January 2011
  - PPG17: Planning for Open Space, Sport and Recreation (July 2002)
  - PPG24: Planning and Noise (October 1994)
- Planning Policy Statements:
  - PPS1: Delivering Sustainable Development (January 2005)
  - PPS1 Supplement: Planning and Climate Change - Supplement to Planning Policy Statement 1 (December 2007)
  - PPS3: Housing (June 2011)
  - PPS4: Planning for Sustainable Economic Development (December 2009)
  - PPS5: Planning for the Historic Environment (March 2010)
  - PPS9: Biodiversity and Geological Conservation
  - PPS10: Planning for Sustainable Waste Management (July 2005)
  - PPS12: Local Spatial Planning (June 2008)
  - PPS22: Renewable Energy (August 2004)
  - PPS23: Planning and Pollution Control (November 2004)

- PPS25 Development and Flood Risk (2010)

5.4 The Department of Communities and Local Government has recently published a new form of national planning policy guidance. The National Planning Policy Framework: Consultation Draft was published for consultation in July 2011. The Framework focuses on the delivery of sustainable development; and explains that there is to be a presumption in favour of sustainable development. In particular, the core planning principles include, amongst others, to “drive and support development” and, that the default answer to development proposals should be “yes” except where this would compromise the key sustainable development principles of the framework.

### **Adopted Regional Planning Policy**

5.5 The London Plan (2011) is the principal land use and planning guidance for London and forms part of the Development Plan. It sets out the spatial strategy and policy context for how and where growth should be accommodated across London. These objectives include:

- optimising the development of previously developed land;
- promoting development in areas accessible by public transport; and
- the potential of mixed use development to strengthen communities and local economies.

5.6 The London Plan provides strategic planning policy and guidance for the next 20-25 years, and continues many of the themes of the previous London Plan (2008) particularly in relation to its support for high density mixed use development in sustainable locations.

5.7 The GLA has also produced the following guidance documents which expand upon and provide further detail to London Plan policy and as such are relevant to the Proposed Development:

- Central London Sub Regional Development Framework (2006)
- Sustainable Design and Construction Supplementary Planning Guidance (May 2006)

- The Mayor’s Energy Strategy (February 2004)
- The London Housing Strategy (February 2010)
- The Mayor’s Transport Strategy (May 2010)
- The Mayor’s draft Economic Strategy (October 2009)
- The Mayor’s draft Climate Change, Mitigation and Energy Statement (February 2010)
- The Land for Transport Functions SPG (2007).

5.8 The supporting planning application documents submitted with this Planning Application refer to a number of additional guidance documents. These relate to detailed topic technical matters and therefore have not been referred to within this Planning Statement.

### **Local Planning Policy**

5.9 The LBHF Core Strategy was adopted on 19th October 2011 following several rounds of public consultation, an examination in public and an inspector's binding report this sets out planning policy and guidance for the Borough.

5.10 Local planning policy and guidance is also contained within the LBHF Unitary Development Plan (UDP) adopted in 2003 (revised in 2007). Following the Planning and Compulsory Purchase Act 2004, LBHF identified policies they wished to “save” to the Secretary of State; it is therefore these saved policies which form the adopted LBHF UDP.

5.11 These saved policies sit alongside the Core Strategy and together with the London Plan policies form the basis for planning policy within LBHF.

5.12 LBHF has also prepared a number of Supplementary Planning Guidance and Documents (SPGs and SPDs) which will be relevant to the Application. These guidance documents have been considered and referred to where relevant within the suite of supporting documents submitted with the Planning Application.

5.13 The London Borough of Hammersmith and Fulham's general approach for the ECWKOA is set out in their vision for the Fulham Regeneration Area (including Earls Court and West Kensington Opportunity Area) in the Core Strategy.

- *"The opportunity area (which forms part of the regeneration area) will be a world class, aspirational, environmentally sustainable new quarter for people to live, work and visit. It will capture the spirit of London and successfully support a mixed and diverse community with quality housing to meet a range of incomes, while contributing to the capital's needs and growth. The residents of the housing estates will have been rehoused within the area in better quality homes and surroundings, and with better access to jobs and local facilities. There will be a vibrant mix of cultural, leisure and community activities, including attractions of national or international importance, that will build on the Earls Court heritage as a destination, as well as meeting local residents needs." (Para. 7.96)*
- *"The regeneration will knit together and mesh with the surrounding area; respecting its urban grain and character. It will provide well designed, safe, permeable, well connected, well managed and cared for, distinctive places, in a quality new neighbourhood. There will be high quality design throughout, blending the best of typical London local character with innovative approaches to mixed use urban design and the best possible environmental standards." (Para. 7.98)*

5.14 Strategic Policy FRA - Fulham Regeneration Area (including the Earls Court and West Kensington Opportunity Area within which the Seagrave Road Site falls) states that an indicative minimum number of 3,400 additional homes and 5,000 - 6,000 new jobs is proposed. This policy explains that:

- *"There is a substantial opportunity for major regeneration based on a phased comprehensive approach to the Opportunity Area comprising the Earls Court exhibition complex (with its car park in Seagrave Road), the TfL Lillie Bridge depot and adjacent housing estates. As a residential led mixed use scheme, this area has the potential to become a major new neighbourhood for the borough and West London providing significant new housing and employment opportunities.*

*The original Earls Court building is located in the Royal Borough of Kensington & Chelsea and that borough broadly shares the council's aspirations in its LDF Core Strategy.”*

5.15 The Core Strategy identifies a number of Strategic Sites and Housing Estate Regeneration Areas of which Seagrave Road is identified as being within Strategic Site and Housing Estate Regeneration Area 1 – FRA.

5.16 The policy states the following:

- *“The Seagrave Road car park must be considered as part of the comprehensive approach to the opportunity area. It should be primarily for residential purposes with supporting facilities, including public open space. Other employment based uses may be appropriate as part of a comprehensive development scheme for the site. The feasibility to provide direct access from Seagrave Road and the site as a whole to West Brompton station should be considered. Development proposals for Seagrave Road should provide for the opportunity to deliver approximately 25% of all housing as social rented housing subject to estate regeneration coming forward, detailed analysis and viability. This will provide opportunities for tenants on local housing estates to be re-housed into better accommodation and to facilitate regeneration on those estates.”*
- *“Regeneration of the West Kensington, Gibbs Green and Registered Provider estates phased over up to 20 years will be encouraged considered as part of the comprehensive approach to the opportunity area. All existing local residents should have the opportunity to be rehoused within the opportunity area or within its vicinity if proposals affect their homes.”*
- *“Overall, the design, layout, massing and density of development must take account of and respect the local context and setting, local conservation areas, and local views. However, development should also recognise the substantial scope offered by the scale and location of the Opportunity Area to create a new sense of place and range of densities. For the Seagrave Road site, the design must also take account of views from the Listed Brompton Cemetery, and local nature conservation.”*

- *“Development must also take account of the capacity of the physical infrastructure, particularly for sewerage and surface water. Any development proposals will need to address the flood risk potential as the site lies in a High/Medium Residual Risk area. All development must incorporate high levels of environmental performance by the use of low and zero carbon technologies, including combined heat and power, the establishment of a decentralised energy network and the installation of renewable energy systems.”*
- *“Development must have regard to guidance set out in the Earls Court and West Kensington Opportunity Area Supplementary Planning Document.”*

### **Emerging Local Planning Policy - Opportunity Area Planning Framework**

- 5.17 The RBKC, LBHF and GLA are currently preparing a Planning Framework for the Earls Court and West Kensington Opportunity Area, within which the Seagrave Road Site is located, in the form of the Earls Court and West Kensington Opportunity Area SPD (ECWKOA).
- 5.18 A draft SPD was issued for public consultation on 11 March 2011. This followed earlier consultations with key stakeholders which helped inform the document. The Applicant submitted representations to the draft SPD in April 2011.
- 5.19 The SPD identifies a number of key objectives to guide the comprehensive regeneration and redevelopment of the Opportunity Area. They seek to:
- Establish detailed guidance on the application of policies within the London Plan and the boroughs’ Development Plan Documents (DPDs) that will be used to assess any application in the Opportunity Area;
  - Establish and provide guidance for masterplanning of the Opportunity Area;
  - Bring forward partnership working in redeveloping the Opportunity Area and maximise public and private resources in regeneration; and
  - Bring consultation forward in the planning process by engaging the public and stakeholders as early as possible in the development process.

- 5.20 The draft SPD looks at three development capacity scenarios. The first scenario does not involve any significant estate regeneration whereas the second and third scenarios include the estates and investigate the impacts and implications of different levels of development.
- 5.21 Overall, the SPD promotes the OA as “West London’s New Urban Quarter” and promotes redevelopment through a housing-led, mixed use development to *create “a world class, aspirational, environmentally sustainable new quarter where people will want to live, work and visit. It will capture the spirit of this part of London by building on the legacy of the Earl’s Court ‘brand’ with a vibrant mixture of leisure and community activities as well as a new cultural facility of at least national significance. It will also create a mixed and diverse community with quality housing to meet a range of incomes and contribute to the Capital’s needs and growth.”*
- 5.22 The SPD presents an illustrative masterplan for the OA to demonstrate how the redevelopment could be accommodated. The Seagrave Road Site is located to the south east corner of this masterplan and is shown as predominantly residential.
- 5.23 A revised draft SPD is expected to be published for consultation purposes in November 2011..

### **Site Specific Designations**

- 5.24 At the regional level, the Site is located within the Earls Court and West Kensington Opportunity Area within the London Plan (2011).
- 5.25 At the local level, the Site is shown within the Core Strategy as an Opportunity Area within the Fulham Regeneration Area, and is in EA Flood Risk Zone 3.
- 5.26 The green strip of land bounding the site directly to the east is however designated within the Core Strategy as a Nature Conservation Area.. The Brompton Cemetery which lies further east within the RBKC, is designated as a Grade 1 Park & Garden of Special Historic Interest, Conservation Area, in addition to being an area of Open Space, Metropolitan Open Land, and a Site of Nature Conservation Importance.

## **6.0 PLANNING POLICY EVALUATION**

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Site comprises the London Plan (2011), the LBHF Core Strategy (2011) and the Unitary Development Plan (UDP) (adopted in 2003, revised in 2007) saved policies.

6.2 This section assesses the Development against the Development Plan and material consideration including other relevant planning policy and guidance at national, regional and local levels. The section is structured into specific planning topics relevant to the assessment of the Development. In relation to some topics, a more detailed analysis of the Development is provided in other supporting planning application documents. Reference is made to these documents where relevant in this section.

6.3 The planning topics considered in this section are:

- i) Principle of Redevelopment and Regeneration
- ii) Land Use
- iii) Leisure
- iv) Design
- v) Townscape and Heritage
- vi) Landscaping and Open Space
- vii) Transport, Accessibility and Parking
- viii) Sustainability and Energy
- ix) Waste and Contamination
- x) Flood Risk and Drainage
- xi) Microclimate
- xii) Daylight and Sunlight
- xiii) Ecology
- xiv) Air Quality
- xv) Noise and Vibration
- xvi) Construction and Phasing
- xvii) Planning Obligations and Section 106 Agreement.

**i) The Principle of Redevelopment and Regeneration**

6.4 The principle of redevelopment of the Seagrave Road Site to deliver strategic land use change and comprehensive regeneration is well established at all levels of planning policy, as follows:

- Planning Policy Statement 1 – Delivering Sustainable Development (2005) explains the national planning policy framework and objectives for delivering sustainable development. This includes promoting urban regeneration, high quality development, the more efficient use land, and high density development (para 27).
- Planning Policy Statement 3 – Housing (2011) sets out the national planning policy framework for delivering the Government’s housing objectives. The document contains policies necessary to deliver the following outcomes: a mix of housing; a sufficient quantity of housing taking into account need and demand; housing developments in suitable locations; and a flexible, responsive supply of land – managed in a way that makes efficient and effective use of land.
- The National Planning Policy Framework: Consultation Draft (July 2011) focuses on the delivery of sustainable development. Core planning principles within the framework include, amongst others, to “drive and support development” and, that the default answer to development proposals should be “yes” except where this would compromise the key sustainable development principles of the framework.
- The London Plan (2011) designates the Earls Court and West Kensington Opportunity Area. The Seagrave Road Site falls within this. Opportunity Areas are the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility. Typically they can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two, along with other supporting facilities and infrastructure (para 2.58).

The Earls Court and West Kensington Opportunity Area is allocated for a minimum of 4,000 homes (refer to Chapter 2 of the May 2011 Panel Report) and an indicative 7,000 new jobs. Annex 1 (ref. 8) of the London Plan (2011) provides

the strategic policy direction for the Earls Court and West Kensington Opportunity Area.

- The London Plan (2011) also promotes:
  - Optimising residential and non-residential densities and a mix of uses within Opportunity Areas (Policy 2.13).
  - The provision, within Opportunity Areas, of social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses (Policy 2.13).
  - Redevelopment and regeneration of Opportunity Areas to contribute to the provision of new housing and employment (Policy 2.13).
  - Increasing housing choice and supply (Policy 3.3) and optimising housing output (policy 3.4).
  - Realising brownfield housing capacity, particularly in Opportunity Areas (Policy 3.3).
  - Encourages large residential developments in areas of high public transport accessibility (Policy 3.7).
  - Efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings, including through setting and monitoring targets for bringing properties back into use. (Policy 3.14).
  - Promoting mixed and balanced communities (Policy 3.9).
  - Supporting development that generates high levels of trips relative to accessibility and public transport capacity (Policy 6.1).
  
- LBHF's Core Strategy provides LBHF's vision for 'major regeneration and growth' which it considers will be focused in a number of Regeneration Areas (Strategic Policy A). One of these – the Fulham Regeneration Area – includes the Seagrave Road Site. The Core Strategy includes a spatial vision for the Borough which seeks to increase the provision of housing; develop more balanced communities; achieve physical, social and economic regeneration of a number of identified areas and housing estates. The Core Strategy explains that the Regeneration Areas include existing housing estates where there is a potential case for regeneration and redevelopment. Paragraph 7.96 of the Core Strategy explains that the Council will

seek the phased regeneration of the West Kensington and Gibbs Green housing estates.

- 6.5 The Proposed Development fully accords with the above current and emerging policies. The London Plan seeks to ensure that development proposals achieve the highest possible intensity of use compatible with the local context, design principles and public transport capacity. This is reflected in the LBHF Core Strategy. Policies within this document seek to deliver mix, scale and density of development that makes the most effective use of land. The Core Strategy and the draft SPD seek to realise the significant potential afforded by the Seagrave Road Site.
- 6.6 Redevelopment will bring about strategic change and growth of a substantial brownfield site. It will deliver significant planning benefits, including many new homes.
- 6.7 In addition, the Core Strategy and draft SPD recognise the opportunity afforded by a comprehensive approach to the Seagrave Road Site and the Earls Court Site. In particular, the ability of such an approach to bring about the regeneration of the existing West Kensington and Gibbs Green housing estates. The Proposed Development has the potential to realise this opportunity and enables the provision of many new high quality homes for both existing and new residents. The Design and Access Statement demonstrates that these new homes will be set within a high quality designed environment and will be served by a network of open spaces.
- 6.8 Overall, the Proposed Development is an appropriate response to the principle of redevelopment and regeneration set out by the planning policy framework summarised above. The suite of documents supporting the Application demonstrate compliance with policy in further detail, and set out justification for and benefits of the Proposed Development.
- 6.9 The Development is justified in terms of regeneration specifically, as follows:
- 6.10 The Proposed Development will regenerate a key brownfield site and in doing so will enable economic growth, provide physical renewal of and deliver social improvements to the wider area. This is in accordance with planning policy for the following reasons:

- National planning policy promotes the regeneration of urban underutilised brownfield sites and the delivery of mixed and balanced communities.
- The delivery of significant new housing is closely linked to realising the development potential of Opportunity Areas. The regional housing targets for London, as set out in the London Plan, are predicated on housing-led redevelopment and regeneration of the Opportunity Areas.
- The reason for designating Opportunity Areas is to stimulate strategic land use change and the potential to enhance housing delivery in areas with potential for such provisions.
- In addition, if required, the Proposed Development is capable of enabling the comprehensive regeneration of the West Kensington and Gibbs Green housing estates through the provision of social rented affordable housing to facilitate the initial decant process
- The London Plan introduces the notion of estate renewal as a specific strategic direction associated with the Earls Court and West Kensington Opportunity Area. A central theme of the LBHF Core Strategy is the regeneration of existing housing estates.
- Physical regeneration and renewal of the existing housing estates is an important benefit achieved by the wider Earls Court Masterplan, which is enabled by the provision of the social rented affordable housing as part of the Proposed Development. It enables the provision of new accommodation that responds specifically to housing need and the shortcomings/issues associated with the existing stock.

### **Alternatives**

6.11 Chapter 3 of the ES assesses alternatives as required by the EIA Regulations. Alternative designs have been assessed within the Design and Access Statement. The Proposed Development complies in all material aspects with development plan policy and fulfils the principles for development of this Opportunity Area. It is therefore considered that it is not necessary to consider alternative sites for the Proposed

Development.

**ii) Land Use**

**Existing Land Use**

- 6.12 The existing use of the Site is as a car park serving the Earls Court Exhibition Centres plus a small number of ad hoc commercial buildings located in the northern part of the site. The London Plan states that the Mayor will and boroughs and other strategic partners should ensure the provision of sufficient land and appropriately located sites for the development of an expanded transport function to serve the economic, social and environmental needs of London.
- 6.13 This is reiterated within The Land for Transport Functions SPG (2007).
- 6.14 The permitted use of the existing site is for car parking associated with the Earls Court Exhibition Centre (LPA Ref: 00715/0020/000). Advice provided by the operating business of the Exhibition Centre (Earls Court & Olympia) has confirmed that the existing car park is only fully utilised on a small number of occasions throughout the year.
- 6.15 EC Properties intend to close the Exhibition Centres following planning consent for the Earls Court Site. However, if planning consent is not forthcoming or if their development objectives were to change, then the Exhibition Centres would continue as an operational business.
- 6.16 The Transport Assessment Addendum demonstrates that this scenario is acceptable in highway terms, through the following revised proposed car parking strategy (which was assessed for the consented Earls Court Link Road planning application):
- The consented Northern Access Road would be used to provide parking for up to 170 cars or up to 29 coaches, accessed via Fenelon Place and the Tesco site;
  - The Blue Car Park expansion would increase its size from 185 to 359 spaces (an increase of 174 spaces);
  - For further large events, it is intended that existing off-site car parks outside the Earls Court area would be used by agreement.

6.17 The car parking arrangement set out above would allow for the re-development of Seagrave Road while the Exhibition Centre continued to operate.

### **Residential**

6.18 The Application proposes 808 residential units comprising 608 private units and 200 affordable units.

6.19 The proposed quantum of residential use within the Application is in line with planning policy requirements; in particular it is in accordance with Policy 3.3 of the London Plan, and Policy H1 of the Core Strategy, which seek to identify new locations for housing. The Proposed Development would assist LBHF in achieving its housing targets.

6.20 In addition the Site is located the Earls Court and West Kensington Opportunity Area in the London Plan. The policies and objectives of these designations aim to deliver comprehensive regeneration including new homes, economic growth, and high density mixed use development.

6.21 Table 2 in Section 4 of this report sets out the residential quantum and unit mix of the Proposed Development. The diversity in residential unit sizes which includes a significant proportion of larger family units will help to create a well balanced new community on the site, and will provide an important contribution towards housing targets across London.

### **Density**

6.22 The Site is publicly accessible with a maximum PTAL rating of 6a ('excellent') at its northern end down to a minimum of 3 ('moderate') at its southern edge. The density matrix set out in the London Plan states that schemes in areas with a 'urban' setting and a PTAL of 4-6 should achieve densities of between 200-700 habitable rooms per hectare (hrph), whereas sites with a PTAL of 2-3 should achieve a density of 200-450 hrph. The density range set out above is net residential density and has therefore been measured from the middle of Seagrave Road. This gives an area which is slightly greater than the site area, of 31,651sqm.or 3.17ha for density calculations. The new garden square within the centre of the site has been included in this site area figure as it will be of ancillary benefit to the residents of the scheme, and the estate roads within

the proposal have also been included. Making allowance for the non-residential floorspace (leisure use of 1,167sqm and the electricity head house of 237sqm) of 1,434sqm, which is 0.01% of the total floorspace proposed, gives a site area of 3.14ha. The 2,332 habitable rooms over the 3.14ha site results in a density of 743 hrph.

6.23 This is considered acceptable and in accordance with planning policy for the following reasons:

- The Site is located in an Opportunity Area where development is expected to optimise residential densities.
- The planning policy framework relevant to the Site promotes high density and intensity of use in order to realise substantial change and regeneration.
- The Proposed Development has sought to maximise density on Site having regard to transport capacity, site constraints and surrounding context.
- The Site is highly accessible and well connected. The Proposed Development density is supported by a Transport Assessment which provides a full technical consideration of the Development in transport and accessibility terms.
- A number of technical assessments have been prepared in support of the planning application in order to understand the implications of the Proposed Development in respect of Townscape & Visual Impact, Daylight and Sunlight, Wind and Air Quality and Noise and Vibration. The results of the technical assessments are set out in the ES and have concluded that the proposed density of development is acceptable.
- Assessments have also been undertaken to ensure that the intensity of the proposed use is compatible with public transport capacity and the local transport network and local social infrastructure, in line with London Plan Policy 3.4 requirements. Further detail of the design and transport impacts is contained within the Transport Assessment and Transport Assessment Addendum together with Chapter 14 of the ES and the ES Addendum concerning Socio Economics.

## **Residential Design**

- 6.24 The Proposed Development has been designed to a high standard with good quality materials which compliment the local character and surrounding environment in accordance with London Plan Policies 3.4 and 3.5 and Policy H3 of the Core Strategy.
- 6.25 The design of the Proposed Development has had regard to the dwelling space standards and the need for new residential properties to be Lifetime Homes compliant. The Proposed Development complies with the Mayor's Housing Design Space Standards in accordance with Policy 3.5 of the London Plan and Policy H3 of the Core Strategy. The Proposed Development is also in accordance with the Lifetime Homes standards. In addition, 10% of units are designed for occupation by wheelchair users as specified within London Plan Policy 3.8, UDP Policy HO6, Core Strategy Policy H4 and Key Principle HO15 of the ECWKO Draft SPD.
- 6.26 The Proposed Development will be compliant with Code Level 4 requirements of the Code for Sustainable Homes.

## **Affordable Housing**

- 6.27 A Viability Assessment has been submitted in support of the planning application and considers the following two scenarios;
- Scenario 1 (Base scenario): Assumes implementation of the Proposed Development on a stand alone basis ie. where the Earls Court Development Option (Site Wide) is not progressed. This scenario assumes 25% intermediate and 75% private housing.
  - Scenario 2: Assumes implementation of the Earls Court Development Option (Site Wide) where Seagrave Road makes affordable homes available as part of the relocation strategy for the existing residents of the West Kensington and Gibbs Green Estates. This scenario assumes 25% social rented and 75% private housing.
- 6.28 The differentiation between the two scenarios reflects guidance contained in planning policy and the decision as to which scenario is delivered will be subject to agreement with LBHF (and will also depend on the outcome of the determination of the Earls

Court Development Option (Site Wide).

- 6.29 Both the LBHF Core Strategy and Emerging ECWKO A SPD state that 40% of all new housing in the Earls Court and West Kensington Opportunity Area should be affordable in accordance with Policy H2 (Strategic Site and Housing Estate Regeneration Area 1 - FRA). Policy H2 states that the council will take into account Site size and Site constraints; financial viability, the individual circumstances of the Site, the availability of public subsidy and the need to encourage rather than restrain residential development when negotiating affordable housing in a proposed development.
- 6.30 The Core Strategy & ECWKO A SPD also state that development proposals on the Seagrave Road Site should provide for the opportunity to deliver approximately 25% of all housing as social rented units subject to estate regeneration coming forward, detailed analysis and viability.
- 6.31 The Viability Assessment submitted as part of the planning application demonstrates that, on the basis of no estate regeneration taking place, the maximum reasonable affordable housing that the Proposed Development can support is 25% intermediate housing. This equates to 200 units which would be located in Block D in the southern part of the Site.
- 6.32 In the event that the estate regeneration programme does come forward, the Proposed Development will provide the 200 units in Block D to enable the first stage of the relocation strategy which will in turn enable the comprehensive regeneration of the Earls Court Development Option (Site Wide) to commence. The viability position of the scheme is such that it is not financially viable to provide any additional affordable housing beyond this level of provision.
- 6.33 Therefore, the approach set out above for the provision of affordable housing in the base case and in the event that the wider Earls Court Development Option (Site Wide) proceeds is fully compliant with the relevant Core Strategy and ECWKO A SPD policies.
- 6.34 In summary therefore it is considered that the residential component of the Proposed Development accords with planning policy for the following reasons:

- The Proposed Development will create a new diverse and sustainable community delivering a mix of new homes in accordance with London Plan Policy 3.8 and the objectives of the Draft London Housing Strategy (2009).
- The Site is located within the ECWKOA and is, therefore, suitable in principle for high density housing. The Proposed Development will result in the redevelopment of an urban brownfield site in accordance with the priority for development in PPS3. The Proposed Development has sought to maximise the amount of residential use on the site and in this respect accords with the London Plan Policy 3.4.
- The Proposed Development achieves a substantial quantum and density of residential use in an area that will have excellent public transport accessibility together with high quality open space, access to local facilities, pedestrian and cycle routes. In this regard the Proposed Development accords with Policy 3.7 of the London Plan which promotes proposals for large scale residential developments.
- The Proposed Development achieves the intensification of housing provision which aligns with objectives of all levels of planning policy, but specifically with the purpose of Opportunity Areas in accordance with Policies 2.13 and 3.7 of the London Plan which promote proposals for large scale residential developments.
- The Proposed Development delivers a quantum of residential use that contributes substantially to the London and borough-wide targets set in accordance with Policy 3.3 of the London Plan.
- The Proposed Development provides housing choice, taking into account local needs and, therefore, accords with London Plan Policy 3.8 and UDP Policy GEN13.
- Alongside units for private purchase, the Proposed Development will provide 200 affordable units which are capable of accommodating existing LBHF households if the wider Earls Court Development Option (Site Wide) comes forward.

- The Proposed Development makes a significant contribution to family housing with provision of 20% housing with 3 or more bedrooms.
- All new residential units will achieve Lifetime Homes standards and 10% will be wheelchair accessible. The provision of Lifetime Homes will help to create a balanced and inclusive community in accordance with Policy 3.5 of the London Plan.
- The proposed residential units have been orientated and massed to take advantage of good levels of daylight, privacy and overlooking. In support of the planning application, Gordon Ingram Associates has undertaken an assessment of internal daylight and sunlight potential. This is contained in Chapter 9 of the ES.

### **iii) Leisure**

- 6.35 The Proposed Development includes an area of leisure space in the form of a ‘Club’. This comprises a gym facility with associated café totalling 1,167 sqm GEA.
- 6.36 The Club is located in the base of Block A and spans above ground and basement levels. The Club facility has been designed to a high standard in line with the rest of the Proposed Development and will act as a community hub for local members.
- 6.37 National planning policy focuses on regeneration of brownfield sites for high density mixed use development. Furthermore, significant emphasis is placed upon creating sustainable communities with easy access to places of work, shops and facilities.
- 6.38 Policy CF1 of the Core Strategy encourages the improvement of the range of leisure facilities within the local area and seeks new facilities, particularly within the ECWKOA. The London Plan reiterates this, emphasising the need for major areas of new development and regeneration to ensure that the need for community facilities is being met wherever possible through the provision of facilities including leisure facilities and open space.

### **iv) Design**

- 6.39 High quality design is a requirement throughout national, regional and local planning

policy and is relevant to determining the suitability of the Proposed Development design and its contribution to the surrounding townscape. Design matters are considered in detail in the Design and Access Statement and Design and Access Statement Addendum prepared by John McAslan and Partners and Paul Davis & Partners.

6.40 Careful consideration has been given from the outset of the design of the scheme to ensure that it is appropriate to its location and surrounding environment. The design objectives for the proposal include a number of key principles which were agreed and taken forward to detailed design from the original Sir Terry Farrell Masterplan for Seagrave Road. These include:

- Central landscaped square;
- Direct permeable east / west connections;
- Complete and coherent urban grain;
- An aspiration for the future continuation of the Lost River Park;
- A variety of residential typologies and massing;
- General increase in scale from West to East;
- Articulated silhouette and massing from the East;
- Tall building located to north of site;
- Basement parking strategy;
- An accessible public realm; and
- Good connectivity.

6.41 The design of the scheme has evolved though pre-application comments received from the GLA, LBHF and RBKC in addition to other statutory consultees and local stakeholders. These comments have been taken into account in the development of the design.

6.42 The original proposal has subsequently been revised to take account of feedback received during the post submission consultation process.

6.43 Regard has been given to planning policy at national, regional and local level in designing the scheme. A summary of the key requirements of policy include:

- PPS1: Seeks development of high quality inclusive design; which is appropriate to their context; provides positive improvement to streetscape; makes efficient use of resources; and, addresses the needs of all society.
- The adopted London Plan requires schemes to: maximise potential of sites; include high quality inclusive design; take into account climate change; respect local context, history, built heritage, character and communities; be accessible, useable and permeable to all; be sustainable; address security issues; be practical and legible; be attractive to look at, excite and delight; respect the natural environment; address health inequalities; provide quality public realm; and, cause no adverse impact on strategic views. (Policies 3.5, 5.1, 7.4, 7.8, 7.2, and 5.3).
- The London Plan states that development should have regard to the local character of an area in terms of form, function and structure of an area; architecture should make a positive contribution to coherent public realm, and streetscape and wider cityscape and be of highest quality. (Policies 7.4, 7.5 and 7.6).
- The LBHF UDP states that new developments need to be of high standard of design compatible with the scale and character of existing development and its setting. In particular the policy states that all proposals must respect:
  - (a) the historical context of the area and its sense of place; and
  - (b) the scale, mass, form and grain of surrounding development; and
  - (c) the relationship of the proposed development to the existing townscape, including the local street pattern and landmarks and the skyline and skyspace; and
  - (d) the prevailing rhythm and articulation of frontages; and
  - (e) local building materials and colour; and
  - (f) locally distinctive architectural detailing; and
  - (g) sustainability objectives; and
  - (h) the principles of good neighbourliness.
- LBHF Core Strategy explains the importance that all development creates a high quality urban environment with the integration of good design and a quality public realm (Policy BE1.)

- The ECWKOA SPD emphasises the need for integration of new developments into the surrounding area in addition to being accessible.

6.44 The design of the Proposed Development is considered to offer a number of significant benefits and therefore complies with the policies listed above by:

- Providing an appropriate density, scale and mass of development as set out above.
- A new hierarchy of high quality open spaces and pedestrian routes and good accessibility for cyclists.
- A variation in architectural styles across the site to reflect the character of the site and its immediate surrounds.
- The creation of strong entrances into the Site and new views and vistas.
- A secure well populated Proposed Development with opportunities for natural surveillance.
- Sustainable and energy efficient buildings (set out under section vii below).

6.45 It is considered that the Proposed Development provides a scheme of the highest architectural quality in terms of appearance, layout and massing, and will contribute positively to the townscape of the surrounding area and thereby accords with PPS1, the London Plan, and the UDP and Core Strategy Policies listed above. Further details of the design of the Proposed Development and how it relates to the surrounding townscape are included within the Design and Access Statement, the Townscape Visual Impact Assessment (TVIA) in Volume II of the Environmental Statement, and the respective Addendum documents.

#### **iv) Townscape and Heritage**

6.46 The impact of the Proposed Development in terms of townscape is considered in detail within the TVIA and the TVIA Addendum.

6.47 Both documents have been prepared with full regard to the policies and guidance contained within the London Plan, LVMF (2010), and it has been concluded that the Proposed Development does not fall within any strategic views or background

assessment areas.

- 6.48 A series of 25 local views from surrounding streets have been agreed with LBHF, RBKC and the GLA. These views include a range of near, middle and distant viewpoints which has enabled a full assessment of the Proposed Development to take place.
- 6.49 The TVIA and TVIA Addendum assess the significance of the Proposed Development in these views in addition to its impact on adjoining Conservation Areas.
- 6.50 The Townscape and Visual Impact Assessments draws the following conclusions:
- With regards to the views, it is considered that where visible, the Proposed Development will benefit London's skyline and the local streetscape;
  - The Proposed Development has been designed to ensure that it has a positive response, in scale and mass, to the existing townscape including the local Conservation Areas;
  - The layout of the Proposed Development will enhance permeability and accessibility for pedestrians establishing visual links with the surrounding area;
  - It is considered that the Proposed Development will transform the Site through its regeneration without harming any historic assets.
- 6.51 It is therefore considered that the Proposed Development accords with PPS5, adopted Policies 7.1, 7.4, 7.8 and 7.11 of the London Plan, LBHF UDP Policy EN2B, Policy BE1 of the LBHF Core Strategy, and Key Principle UD4.2 of the ECWKOA Draft SPD.
- 6.52 The TVIA and TVIA Addendum also incorporate a PPS5 Heritage Assessment which assesses the Proposed Development in relation to heritage considerations, Listed Buildings and Conservation Areas in addition to any historic assets which lie in the vicinity of the Site.
- 6.53 The Assessment concludes that the scene and setting of Brompton Cemetery is distinctly urban; it is, in part, the contrast of character and atmosphere to the buildings outside it that gives the Cemetery its value. The Cemetery was designed to focus on

the formal composition of the Ceremonial Axis and the listed buildings at either end of it; this forms the core of the Cemetery. The Western Burial Zone is the least coherent area within the cemetery and improvement of the consistency of the western boundary would improve the appearance of this part of the Cemetery.

- 6.54 The impact on the Cemetery has been tested using a sequence of views. The Proposed Development will be visible along the western boundary of the Cemetery in relation to the existing Empress State Building and the EDF substation, through and above existing mature trees. The Proposed Development where visible will be seen as a layered and well articulated composition of distant townscape. In summer, planting on the western side of the cemetery will screen the Proposed Development to a greater extent. The setting of the Grade I listed Cemetery and conservation area and the Grade II\* and Grade II listed structures within it will not be harmed.
- 6.55 The impacts on the settings of local conservation areas, and listed buildings in the local area have been assessed and in many cases the Proposed Development is not visible and where visible the Proposed Development will leave their settings unharmed.
- 6.56 As required by PPS5, the potential impacts on heritage assets on and off Site has been fully assessed and any harm weighed against the enhancements and public benefits brought by the scheme overall. The assessment concludes that the proposals will be, on balance, of significant benefit to the local and wider historic environment. The significance of each heritage asset, and the parts of the setting that contribute to that significance, will be preserved by these proposals.

**v) Landscaping and Open Space**

- 6.57 A Landscape Strategy was prepared for the original scheme by Patel Taylor and has been updated to reflect the proposed scheme changes. The updated landscape drawings set out information on the layout of open spaces across the Site in addition to the location and type of play spaces to be provided, and the proposed species of flora to be included within the planting scheme.
- 6.58 A number of key principles underlie the public realm strategy as outlined within the Landscape section of the Design and Access Statement. These include:

- The creation of connections into the existing urban fabric to ensure open space relates to the existing context to ensure permeability through the Site is encouraged;
- The creation of a hierarchy of open spaces and a variety of spaces to support the built masterplan;
- To establish the identity of a new residential quarter, creating a cohesive public realm and landscape character; and
- To encourage active use of the open spaces and sustainable land use.

6.59 Following the proposed scheme amendments some changes to the landscape strategy have been made, in summary these comprise:

- The removal of a communal terrace from Building D, replaced with a living brown roof. This was to minimise the impact to the Brompton Cemetery.
- The alteration of the landscaping around Building E to accommodate the change in form of that building. Additional public space has been included consisting of a lawn and more garden rooms.

6.60 The Proposed Development benefits from a comprehensive range of amenity space types including:

- Public and private green spaces including natural and semi natural green places;
- Public open space encompassing a balance of hard and soft surface areas;
- Active shared surface streets and civic open spaces with predominantly hard landscaping;
- Publicly accessible green spaces within a garden square;
- Communally accessible amenity space for residential buildings providing space for recreation, leisure and play;
- Private outdoor space at grade through the provision of private rear gardens, light wells to residential units at lower ground level and front gardens or defensible space facing onto the public realm;

- Additional private outdoor space is also provided as balconies or roof terraces.

### **Amenity Space**

- 6.61 Amenity space will be provided as private, communal or public open space, including private gardens, balconies, private and communal roof terraces, and communal and public green spaces at grade.
- 6.62 The Mayor's Housing SPG (2010) provides a requirement for the provision of a minimum of 5sqm of private outdoor space for 1-2 person dwellings and an extra 1sqm to be provided for each additional occupant.
- 6.63 The LBHF UDP includes a requirement for private amenity space to be provided for family units at 36 square metres and non family units at 14 square metres.
- 6.64 The draft ECKWOA SPD emphasises that all new homes should have satisfactory access to outdoor amenity space, and that family dwellings located at ground floor level should have access to private amenity space. The SPD Urban Design Strategy suggests a variety of small parks, squares and gardens as an appropriate strategy to provide public, communal, semi private and private amenity space.
- 6.65 The updated planning application drawings demonstrate that the many of the proposed ground level residential units have outdoor space provision through the provision of private gardens or terraces. Where this is not possible however the minimum amenity area is provided communally within the development plot curtilage. In addition where it is not possible to locate a family dwelling with accommodation at ground floor level the minimum area of open space (i.e. 36sqm per dwelling) is provided communally within the development plot curtilage, within easy view of the dwelling.
- 6.66 With regard to non family dwellings which are located above ground floor level, at least the minimum private outdoor space will be provided in compliance with the Mayor's Housing SPG wherever possible. The remaining amenity required for the dwelling will be provided communally or as public open space.

### **Playspace**

- 6.67 The Play Strategy is included within the Design and Access Statement and

demonstrates that an assessment of existing and proposed playspace provision has been undertaken for age groups 0-4, 5-11 and 12-16.

- 6.68 The quantum of playspace provided within the Proposed Development has been based on a minimum figure in line with the GLA SPG – Providing for Children and Young People’s Play and Recreation (2008) which states a minimum of 10sqm of dedicated playspace per child. A total of 3,750sqm of playable area is included within the Proposed Development, not including private gardens in accordance with policy.
- 6.69 The Play Strategy clearly demonstrates that a variety of playable area has been incorporated throughout the Proposed Development; such spaces include:
- Equipped Play Space;
  - Natural and Interpretive Play;
  - Ground Up Play (Boules);
  - Possible Artist Interventions;
  - Playable Open Space; and
  - Private Gardens.
- 6.70 The proposed play spaces will be of a good quality and have been well designed to include both stimulating play facilities and informal recreation provision as suggested in Policy 3.6 of the London Plan.
- 6.71 The Landscape Strategy will ensure that there is provision of both quality open space, including areas of nature conservation interest, and children’s play provision in the Proposed Development as required by Policy OS1 of the Core Strategy.
- 6.72 The Landscape Strategy also includes information relating to planting, setting out an indicative planting mix. SUDS and irrigation systems are also incorporated into the Landscape Strategy in order to support the proposed planting.
- 6.73 The Landscape Strategy demonstrates that high quality and well managed open spaces are proposed within the Application as required by PPG17, the public realm will be enhanced as a result of the Proposed Development in line with Policies 2.18 and 7.5 of the London Plan, and that the Proposed Development promotes appropriate elements of open space which make a positive contribution to and are integrated with the wider network, in line with Key Principles UD3.1, UD3.3 and UD3.4 of the ECWKO Draft

SPD.

6.74 The design of the landscaping and open space throughout the Proposed Development is intended to meet the highest standards of accessible and inclusive design to ensure that the public realm is truly enhanced in line with policies 7.2 and 7.5 of the London Plan and Policy BE1 of the LBHF Core Strategy and Key Principles UD3.1, UD3.3 and UD3.4 of the ECWKO Draft SPD.

6.75 Significant improvements are also proposed for Seagrave Road including the widening of the pavement width and the replacement of the existing street trees in line with Key Principles UD1.1 and UD1.2 of the Draft ECWKO SPD. This will help to enhance the environment of Seagrave Road, ensuring that it is pedestrian friendly, helping to connect the public realm within the Proposed Development and the public realm within Seagrave Road. The proposed east and west links throughout the Seagrave Road Site will also help to provide this connectivity in accordance with Key Principles UD1.1 and UD1.2 of the Draft ECWKO SPD.

#### **vi) Transport, Accessibility and Parking**

##### **Transport**

6.76 In accordance with planning policy a full Transport Assessment was provided as part of the original submission including a Travel Plan and Delivery Servicing Plan. A Transport Assessment Addendum has subsequently been prepared to address post submission feedback provided by LBHF and TfL.

6.77 The Transport Assessment and Transport Assessment Addendum which accompany this Application assess the potential contribution to traffic generation and possible impacts to congestion in line with Policy TN13 of the LBHF UDP. The Transport Assessment concludes that:

- The Proposed Development will see net reduction in car trips when comparing the proposed low traffic generating residential use with the existing car park use of the site.
- The Proposed Development has been assessed against the relevant criteria for all modes of transport throughout the construction and operational phases.

- It will not cause a material impact to the transport network. It is considered that the resultant travel demand will be well below the current peaks associated with Earls Court Exhibition Centre events.
- Demand can be accommodated on the highway, public transport, and pedestrian and cyclist networks with appropriate new junction and access arrangements, subject to the mitigation of local impacts (see below) and the measures included within the Travel Plan.

6.78 A range of mitigation measures are proposed in order to offset the relatively limited impact of the Proposed Development. Such measures include improving existing bus stops along Lillie Road, improving existing cycle routes and also cycle parking facilities in the local area.

6.79 The proposed improvements to Seagrave Road will significantly enhance the pedestrian environment in the locality, encouraging people to walk in line with Key Principle UD3.4 of the ECWKO Draft SPD and Policies 6.1 and 6.10 of the London Plan. In addition the inclusion of shared surface streets within the Proposed Development will ensure that the environment is both cycle and pedestrian friendly as suggested in Key Principle TRN5.

### **Accessibility**

6.80 The Site is accessed from Seagrave Road via three street level vehicle accesses; these are shared with pedestrians and cyclists. A pedestrian only access is located at the north of the site from Rickett Street and the scheme has been designed to encourage a permeability of pedestrian movement throughout the site, encouraged by the shared surface spaces and at grade pedestrian crossings and routes.

6.81 Servicing and delivery vehicles are also able to access the site at ground level from the two main accesses and travel through the site in a forward gear. It is proposed that servicing vehicles will be able to carry out deliveries from the shared surface highway close to all residential entrances. Emergency vehicles would also be accommodated on all accesses and internal roads.

6.82 The site is highly accessible by public transport, with a Public Transport Accessibility Level (PTAL) ranging from 3 (“moderate”) at the Site’s southern edge to 6a

(excellent) at the Site's northern end. There are currently 7 bus stops located within 640m walking distance from the Site which are served by a range of bus services. With regard to rail services both London Overground and Southern trains run services via West Brompton. West Brompton also provides District Line underground services.

### **Parking**

- 6.83 Cycling facilities will be provided within the development for residents and visitors totalling 978 and 81 cycle spaces respectively, in accordance with London Plan standards and Policy TN6 of the LBHF UDP. Cycle parking for residents will be located in the basement in the form of double height Josta parking systems; visitor cycle parking will be provided at ground level across the site in convenient locations.
- 6.84 A total of 40 motorcycle parking spaces will be provided at basement level within the Proposed Development.
- 6.85 A total of 485 residential car parking spaces are proposed at basement level based on a ratio of 0.6 spaces per dwelling which has been informed by and is comparable to current car ownership levels. 30 visitor spaces will be provided at ground level across the site.
- 6.86 The applicant wishes to ensure that the scheme is accessible to all, and therefore 56 of the total basement car parking spaces will be for disabled users, together with a further 25 spaces at ground level. The spaces will be located close to building entrances in line with Policy TN4 of the LBHF UDP and Policy T1 of the Core Strategy. No parking facilities are proposed for the proposed gym facility.
- 6.87 A total of 20% of car parking spaces will be provided with electric charging points and a further 20% of spaces will be provided with passive electric charging to enable further use in the future in accordance with London Plan Policy 6.13.
- 6.88 The provision of cycle parking facilities will help to encourage use away from the private car. A Residential Travel Plan has been developed in accordance with TfL best practice and will be adopted as part of any future Section 106. The key principles from the Travel Planning Strategy includes:

- Create two-way streets to encourage cycling;
- Direct connections of new streets to existing streets;
- Provide on-site changing and showering as part of all employment land uses;
- Minimise commercial parking supply;
- Ensure junctions are safe and contribute to improved road safety in the area;
- Financial contribution to the increase in frequency of existing bus routes;
- Financial contributions towards bus stop upgrades to meet current TfL standards;
- Provide financial incentives for public transport usage as interest free season ticket loans;
- On site management to operate concierge and delivery management strategy;
- To adopt Controlled Parking Zone;
- Development of car share database;
- Low Emission Vehicle Strategy;
- Provide all new residents with a Travel Pack;

6.89 In addition, two Car Club spaces are proposed; these will provide a car hire service, encouraging a reduction in private car usage. It is proposed that free membership for residents could be provided for a defined period of time.

6.90 It is proposed that Travel Packs will be made available to all site occupants. A key role of the Travel Pack will be to raise awareness of the sustainable travel initiatives being implemented through the Travel Plan including:

- Promotion of walking;
- Promotion of cycle parking ;
- Promotion of Barclays Cycle Hire Scheme;
- Promotion of cycle training;
- Promote membership to the London Cycling Campaign (LCC) ;
- Promotion of public transport;
- Promotion of Car Clubs and Car Sharing.

6.91 It is considered that the Proposed Development adhere to the principles of sustainable transport planning as set out in PPS1 and PPG13 and are in accordance with policies contained in the London Plan, , LBHF UDP, LBHF Core Strategy and the ECKOWA Draft SPD.

## **vii) Sustainability and Energy**

6.92 The Proposed Development has sought to address sustainability through design and in construction. The policies contained in the London Plan, GLA's Sustainable Design and Construction SPG, LBHF UDP, Core Strategy, and the Draft ECKOWA SPD have been taken into account in designing the scheme. The proposal is targeting a Code for Sustainable Homes 'Level 4'.

### **Energy**

6.93 An Energy Strategy and a Sustainability Strategy have been undertaken in line with London Plan requirements and Key Principle ENV4 of the ECWKO Draft DPD, and are submitted with this Application. These strategies assess the Proposed Development in relation to the requirements of planning policies and principles of sustainable development energy efficiency.

6.94 The Energy Strategy sets out the estimated total energy demand and associated CO2 emissions in accordance with Policy 5.2 of the London Plan. The heating plan has also been selected according to the hierarchy set out under Policy 5.6 of the London Plan.

6.95 An assessment has been undertaken to ensure compliance with Part L Building Regulations and the Regional and Local policy requirements. The energy strategy has used the approach set out in the Mayor's Energy Hierarchy of 'Be Lean', 'Be Clean' and 'Be Green'. This involved an assessment of low / zero carbon technologies which concluded that photovoltaic solar cells will be incorporated within the development. A gas fired Combined Heat and Power plant is also proposed with two dedicated energy centres in line with London Plan policy requirements, in addition to a number of passive measures to reduce energy consumption. The following passive measures are will be considered for incorporation in the scheme:

- Optimised building shape / for orientation;
- Façade treatment;
- Thermal mass / thermal insulation;
- Passive solar heating; and
- Measures to maximize natural day lighting.

6.96 In summary a wide ranging assessment of relevant national, regional and local policy has informed the Proposed Development. The Proposed Development has been fully assessed against the GLA's Supplementary Planning Guidance on Sustainable Design and Construction and demonstrates compliance with the essential standards and a majority of the preferred standards. This includes full compliance with London Plan policies associated with energy, heating and cooling hierarchies (Policy 4A.1 and 5.6) and Draft Replacement London Plan policies 5.2, 5.4, 5.6 and 5.7. The Proposed Development is considered to comply with relevant sustainability and energy policies and national, regional and local levels.

### **Sustainability**

6.97 The Proposed Development will achieve the Code for Sustainable Homes Level 4 demonstrating the sustainability credentials of the Proposed Development. A Code for Sustainable Homes Pre-assessment has been undertaken by Hoare Lea and accompanies this application.

6.98 The Sustainability Strategy explains that the Proposed Development includes low carbon buildings and a very low carbon energy strategy, striving towards a very low carbon place, society and economy which will be made via the massing of buildings; the mixing, proximity of land uses and activities with the local area; safe streets which make walking both possible and a pleasant experience; bike culture; and assistance with the creation of an urban ecological habitat. The energy analysis undertaken for the proposed scheme demonstrates a 44% improvement over Part L 2006, and a 25% improvement over the Part L 2010 baseline. The provision of photovoltaic cells will also provide an additional improvement of 0.69%.

6.99 The proposed energy centres associated with the Proposed Development have also been designed to accommodate future connection to the Earls Court district heating scheme.

6.100 The Sustainability Strategy sets out the key sustainability related elements of the scheme which are explained in the paragraphs below.

### **Electric Vehicle Charging**

6.101 Charging points and incentives will be provided to encourage the use of electric and

plug in hybrid cars. This will ensure that the Proposed Development complies with the Transport for London target of at least 1 in 5 of all parking spaces having an electrical charging point with electrical infrastructure. In addition 2 dedicated car club parking spaces will be provided to help reduce reliance on the private car.

### **Design for rainwater irrigation**

6.102 Rainwater harvesting will be used for irrigation purposes. It is intended that the need for irrigation will be at times when rainfall is low, storage will there need to be supplemented with potable water. Individual rainwater butts will be provided in rear garden for the houses within the site.

### **Embodied Carbon**

6.103 All buildings within the Proposed Development will be mindful of embodied carbon throughout construction and will employ reused and reusable materials wherever possible. Materials will be sourced as locally as possible but not at a disproportionate cost or the detriment to the design of the building. Further details in relation to this are contained within the Construction Environment Management Plan.

### **Bike Culture**

6.104 The Proposed Development incorporates integrated and highly visible cycle parking for both residents and visitors. Opportunities to highlight the connection to the London Cycle Hire scheme will be maximised to help to development a culture of cycling within the site.

### **Food Culture**

6.105 Provision is made within the Landscape Strategy for food cultivation as a way to engage residents both on site and locally. A small productive food garden is proposed; this will include a variety of herbs and will be incorporated within the Garden Square. It is also likely that fruit and nut trees will be included within the communal gardens and private gardens. Tree species proposed within the Site have been chosen to ensure that they are beneficial to UK wildlife and produce fruit that birds will eat.

## **Green Infrastructure**

6.106 A range of high quality green infrastructure which includes specific ecological niches for priority species are proposed to enable the creation of a high quality ecological environment. This will be delivered through a range of formal and informal spaces such as balconies, roof spaces, green walls, SUDS and multi-functional play spaces.

## **Sustainable Lifestyles**

6.107 The design of the Proposed Development has sought to promote social interaction through the provision of an attractive layout and public realm which encourages both walking and cycling, promoting healthier lifestyles. Natural surveillance has also been incorporated into the proposed design to ensure safety.

6.108 Brown and Green roofs are also incorporated within the Proposed Development. It is intended that the Brown roofs will be a stony-grassland native planting mix creating a habitat that is attractive to a variety of insects and birds. The Green roofs will comprise an acid grassland habitat to create a visually interesting habitat to attract a variety of insects and birds and also to form an extension to the important native SCNI habitat which adjoins the site at the eastern boundary.

## **ix) Flood Risk and Drainage**

### **Flood Risk**

6.109 The Site is located within Flood Zone 3 as defined by the Environment Agency. Flood Zone 3 is an area with a high probability of flooding, i.e. during a flood event with a greater than 1 in 200 probability of occurring each year (1 in 200 year event).

6.110 In accordance with PPS25 recommendations and local planning policy, a Flood Risk Assessment has therefore been undertaken for the Proposed Development and is submitted with this Application. Chapter 16 of the Environmental Statement provides a summary of this.

6.111 The Flood Risk Assessment explains that the Site is currently defended by the Thames flood defences from flooding caused by fluvial and tidal flood events in the River Thames for up to the 1 in 1000 year return period.

- 6.112 The Site has been classified as Medium to High Residual Flood Risk, as in the event of a breach of the River Thames flood defences during a 1:200 year event (plus an allowance for climate change) the Site would receive over 300mm of flooding, and over 600mm of flooding in some locations. It would take 3-4hours for the flood water to arrive at the Site, a period which is considered to be sufficient to raise an alarm and allow evacuation to occur.
- 6.113 The Flood Risk Assessment does however emphasise that for the Seagrave Road Site to be flooded from the River Thames it would require two unlikely events to occur simultaneously: a 1:200 year flood event combined with a failure of the flood defences specifically located at or near Chelsea Creek. Therefore it is concluded that the actual probability of occurrence is extremely low and significantly lower than a 1:200 year event.
- 6.114 It has been agreed with the EA and LBHF that sleeping accommodation will be set at a minimum breach level (4.1 metres). Confirmation of this approach is included within Appendix 2 to the Flood Risk Assessment which forms Appendix H in the Environmental Statement Technical Appendices document. The Proposed Development has been designed to ensure that safe means of escape will be provided within the Site. Further details of the proposed strategy to ensure that fluvial flood risk is adequately mitigated is contained in the Flood Risk Assessment.
- 6.115 In relation to the likelihood of flooding from groundwater, the Flood Risk Assessment concludes that this is not considered to be significant, this is also reaffirmed within ES Addendum. Basements will however be waterproof lined to reduce the risk of ground water ingress.
- 6.116 The Flood Risk Assessment recommends that a Flood Management Plan is produced to ensure that users of the Site are aware of the residual risks.

### **Drainage**

- 6.117 A Sustainable Urban Drainage Systems (SUDS) assessment has been undertaken for the Proposed Development in line with Ciria Report 609. The assessment concludes that the following SUDS are suitable for the Proposed Development (in order of suitability):

- Pervious pavements;
- Green roofs (60% green roofs); and
- On/off line storage in attenuation tank and oversized pipes.

6.118 The FRA states that currently all three SUDS are proposed for inclusion within the Proposed Development. This will result in a significant reduction of peak flows to less than current discharge rates resulting in a minimum environmental impact.

6.119 The Proposed Development therefore accords with PPS25 requirements in addition to London Plan Policies 5.12 and 5.13, Core Strategy Policies CC1 and CC2, and ECWKO Draft SPD Key Principles ENV22, ENV23 and ENV26.

### **viii) Waste and Contamination**

#### **Waste**

6.120 Chapter 6 of the Environmental Statement and ES Addendum assess the waste related impacts associated with the Proposed Development. This demonstrates that using the BS5906:2005 methodology, the Proposed Development is predicted to produce a maximum of 19,986 litres of waste per day:

- 18,773 litres of residential recyclate and residual waste; and
- 1,213 litres of commercial recyclate and residual waste.

6.121 The ES explains that a significant proportion of this waste is recyclable (approximately 44% by volume), 44% will be non recyclable and 12% will be organic wet kitchen waste. Building maintenance will also store other waste streams including printer and toner cartridges and fluorescent light tubes and paints and oils as these require disposal in accordance with Duty of Care Regulations.

6.122 For the residential blocks, waste will be collected twice weekly. A facilities management company will transfer the waste from each building core to the Central Waste Area (CWA) in time for the separate collections. The waste will be transferred to ground level by staff and collected by the refuse vehicle. The refuse vehicles will access the Site from the main access to the south of the Site at ground level.

6.123 For the residential houses refuse bins and recycling sacks will be put on the kerbside

for collection at the relevant time.

- 6.124 For the gym and associated cafe, waste collection will be undertaken by the local authority or a private contractor upon agreement with the tenants and facilities management team. It is envisaged that a low level of servicing will be required for the commercial premises with up to one trip per day. As both commercial elements are located at the northern end of the site, the refuse vehicle will access the Site via the internal road adjacent to the café by performing a T turn movement.
- 6.125 Lumber stores are proposed within the Proposed Development. These will be areas within the basements for each building to provide storage for discarded bulky items e.g. furniture which can be re-used internally and/or made available to others such as charities or schools for reuse.
- 6.126 A Site Waste Management Plan will also be produced for the Proposed Development post planning; details of what this is likely to comprise are set out in Chapter 6: Waste of the ES.
- 6.127 It is therefore evident that the proposed waste strategy for the Development is in accordance with PPS10, UDP Policy EN17, Core Strategy Policy CC3 in addition to acknowledging the guidance of LBHF's Storage of Refuse and Recyclables SPD, and Key Principles ENV11, 12 and 14 of the ECWKO Draft SPD.

### **Contamination**

- 6.128 Chapter 11 of the Environmental Statement and ES Addendum concerns Ground Conditions. This Chapter demonstrates that a number of geo-environmental site investigations have taken place. In-situ testing was then carried out in order to ascertain engineering design values and to allow soil sample analysis to enable environmental classification. Groundwater monitoring wells were also installed. Laboratory chemical testing was also carried out to fully characterise the near surface ground conditions of the site, and soil samples were submitted for geotechnical testing. Chemical testing was also carried out on soil and groundwater samples, and groundwater level and soil gas monitoring visits were undertaken.
- 6.129 Chapter 11 demonstrates that made ground was encountered in all exploratory hole locations however analysis of the chemical test results for this indicates that the

material is not hazardous. The contaminants are considered to be generally below the assessment criteria, as such based on the minimal levels of contamination encountered during the Site Investigations risks to future site users and vegetation are considered to be negligible.

- 6.130 Chapter 11 concludes that all impacts related to ground conditions can be mitigated to an acceptable level of significant through best practice measures and industry recognised standards. DEMP's, phase specific CEMP, phases specific SWMP, Emergency Response Plans and Health and Safety Plans will be produced to manage these measures.
- 6.131 This Chapter illustrates that the Proposed Development is in compliance with relevant policies (Policy CC4 of the Core Strategy) which seek to manage the development of land in order to minimise the potential harm of contaminated sites and where appropriate, ensuring that mitigation measures are put in place.

### **Microclimate**

- 6.132 A Wind Assessment was undertaken by RWDI in order to assess both the existing wind conditions in relation to the Seagrave Road Site and the likely wind conditions which would result from the Proposed Development. A full statement demonstrating the detail of the assessments undertaken and their results are contained within Chapter 17 of the accompanying ES.
- 6.133 The Wind Assessment involved wind tunnel testing in order to ascertain the pedestrian wind conditions which are likely to result from the Proposed Development; both during construction and post completion.
- 6.134 The wind tunnel test demonstrated that the existing Site has a mixed wind microclimate which is suitable for leisure walking, standing and sitting during the windiest season.
- 6.135 During the construction of the Proposed Development (with phase 1 and 1b complete) the wind tunnel test showed that during the windiest season, the wind microclimate amongst the built out proposed buildings for Phases 1 and 1(b) is largely suitable for standing and sitting with leisure walking condition expected at some building corners and along the adjacent railway lines. The report concludes that as most on-site

locations are suitable for leisure walking or better throughout the year, negligible, minor beneficial and moderate beneficial impacts are expected at all locations on pedestrian thoroughfares where leisure walking, standing and sitting conditions are predicted, respectively. It is considered that all entrance locations will be suitable for standing and sitting in the worst case season, implying a negligible to minor beneficial impact in the midst of the construction works for the Proposed Development. It is confirmed within the ES Addendum that these conclusions remain valid.

- 6.136 Once the Proposed Development is complete (with existing surroundings and no mitigation measures in place) the assessment concludes that the environment is suitable for a range of conditions, from sitting to leisure walking, during the windiest season. It is explained that the majority of locations are suitable for standing sitting through the year. It is therefore concluded that the range of conditions represents a negligible to moderate beneficial impact on all pedestrian thoroughfares and negligible and minor adverse impacts are expected at all entrance locations to the proposed buildings.
- 6.137 In RWDI's experience, it is considered that the main wind effects associated with a new development occur in the immediate vicinity of the new buildings, unless the new buildings on the edge of the Site are particularly tall and/or surroundings particularly open so that high level winds are able to penetrate further into neighbouring areas. For these reasons, the assessment was concentrated within and around the perimeter of the Seagrave Road Site and adverse wind effects are not expected in terms of the intended pedestrian use around the site and in neighbouring areas, such as the Brompton Cemetery, parts of Seagrave Road, and the Ambulance Station located immediately south of the site.
- 6.138 The landscaping scheme is proposed to act as mitigation to ensure that any detrimental impact is minimised in line with PPS1 guidance. The landscaping for each building of the Proposed Development will be completed when each building is complete. Therefore, where mitigation is recommended for the completed Proposed Development, such measures are also expected to benefit the relatively windier zones during the construction phasing of the Proposed Development.
- 6.139 It is therefore apparent that the impact of the Proposed Development on the wind

environment is negligible, and that the large scale buildings within the development including tall building Block B in particular, have been designed to ensure that they are sensitive to their impact in terms of wind in accordance with planning policy 7.7 of the London Plan; and that wind conditions have been moderated around high buildings following the guidance contained with The Spatial Development Strategy Technical Report 19, London's Skyline, Views and High Buildings.

6.140 In addition the proposed mitigation measures will ensure that all unacceptable harm to the amenity of the surrounding land and buildings in relation to wind is avoided as required by policy 7.6 of the London Plan.

**xi) Daylight and Sunlight**

6.141 Daylight and Sunlight issues associated with the Proposed Development have been investigated by Gordon Ingram Associates in the form of a Daylight and Sunlight Assessment; this is contained within Chapter 9 of the ES and also the ES Addendum.

6.142 The potential impact on neighbouring residential properties along Seagrave Road, and within Roxby Place to the north of the Site, were assessed in order to understand the potential impact of the Proposed Development on levels of daylight and sunlight within these properties.

6.143 The Daylight and Sunlight assessment included an assessment of the levels of daylight, sunlight, shadow for a base line and mirrored base line scenario. The purpose of the mirrored baseline scenario is to provide a more realistic comparison of the impacts to the neighbouring buildings on the basis of a hypothetical massing assuming a typical London street scene. By considering how this mirrored massing would impact the surrounding properties, it is possible to gain a more realistic appreciation of reasonable levels of acceptable daylight and sunlight in this urban context.

6.144 The Mirrored Baseline results show a reduction in Annual Probable Sunlight Hours compliance. This is most evident to properties overlooking the Site along Seagrave Road that currently enjoy almost unimpeded light that is exceptional for this area of London. The additional impacts are caused by the theoretical additional massing which results in a more realistic urban level of sunlight for the area.

6.145 With regard to the 'No Sky Line' method, the assessment demonstrates that a high

proportion of rooms are able to receive direct skylith at working plane height at over 50% of their room area.

- 6.146 The impact of the Proposed Development internally within the Site was also assessed to ensure that new residential developments resulting from the proposals would have suitable levels of daylight and sunlight.
- 6.147 GIA have worked closely with the design team throughout the evolution of the Proposed Development to ensure that the residential properties within and neighbouring the Site will have adequate levels of daylight and sunlight.
- 6.148 Throughout the design development process, mitigation measures have been incorporated into the scheme to ensure that adequate levels of daylight and sunlight are achieved across the Site and surrounding the Proposed Development in line with PPS1 guidance.
- 6.149 Considering the Site is currently largely undeveloped, and the fact that some neighbouring properties currently fail to satisfy the BRE guidelines, the assessment includes a very good rate of compliance for a site in a dense urban environment.
- 6.150 As such it is evident that the Proposed Development has been designed to ensure that all large scale buildings including Block B at 16 storeys, are sensitive to their impact on daylight and sunlight in compliance with policies 7.6 and 7.7 of the London Plan.

## **xii) Ecology**

- 6.151 An Ecological Assessment was carried out for the Proposed Development to evaluate the likely impacts of the Proposed Development on the ecological value and biodiversity of the Site itself, and the surrounding habitats, as requested by Key Principle ENV28 of the ECWKOA Draft SPD. This Assessment is contained within Chapter 10 of the ES.
- 6.152 The Site itself is not host to any flora or fauna of high botanical or habitat value and no native plant species of national importance have been identified in this location.
- 6.153 The green strip of land which spans the eastern boundary of the Site is however designated within the LBHF UDP as a Site of Nature Conservation Importance and is

graded Grade 1. Chapter 10 of the ES explains that only a fragment of this site lies adjacent to the eastern boundary of the site which forms part of the Network Rail railway lines and also provides an undisturbed wildlife habitat.

- 6.154 Chapter 10 demonstrates that the variety of habitats located within this location include woodland, herbaceous vegetation and grassland which provide a valuable wildlife corridor and support scarce plants found nowhere else in the Borough. The area adjacent to the Proposed Development however is dense scrub and is considered to be of relatively lower ecological value than the remainder of the SNCI.
- 6.155 The landscaping scheme has been designed to introduce flora and fauna into the Site. The Proposed Development will improve the ecological value of the land, encouraging wildlife through the incorporation of native trees and shrubs, water features and natural play features. In addition the landscape proposals at roof level will further enhance the environment across the site through the provision of planting boxes, areas of extensive green roof containing native wildflower mixes and brown roofs to encourage wildlife on the tallest buildings.
- 6.156 The landscape scheme for the Proposed Development includes the installation of green roofs in addition to a SUDS system to provide irrigation to the site planting in line with Key Principle EN3 of the ECWKO A Draft SPD.
- 6.157 The strip of green land along the eastern boundary for the Site is not currently within the red line boundary of the Application. However, negotiations are ongoing with the land owner and the Applicant regarding its purchase. The Proposed Development contemplates the future integration of this strip of land into the scheme. The incorporation of this land will enable enhanced connectivity throughout the site and into the surrounding environment.
- 6.158 This therefore does not result in a net loss of area of Site of Nature Conservation Importance, but instead would provide knowledge and understanding for the public regarding its biodiversity and ecological value, demonstrating why such environments should be respected and protected, thus enhancing the beneficial use of the space for the community in accordance with Policies 7.18 and 7.19 of the London Plan and Key Principle ENV29 within the ECWKO A Draft SPD.

6.159 It is therefore considered that the Proposed Development has been designed in accordance with PPS9 guidance and policy 2.18 through the incorporation of appropriate elements of open space which are integrated into the wider network of green infrastructure, forming a green link to the wider public realm, and improving access for all.

### **Air Quality**

6.160 Air Quality was assessed by URS to establish the existing air quality situation on the Site and the air quality which is likely to result from the Proposed Development. The full Air Quality assessment is contained within Chapter 7 of the ES and ES Addendum submitted with this Application.

6.161 The Site is located within an Air Quality Management Area which spans across the whole of LBHF.

6.162 A number of measures have been incorporated within the Proposed Development to ensure that air quality is controlled and protected to provide a healthy environment for new and existing residents; acknowledging PPS23 guidance. This demonstrates that the Proposed Development will not negatively impact on the air quality of the locality and instead will endeavour to improve air quality as requested in Key Principle ENV8 of the ECWKOA Draft SPD.

6.163 During construction a Construction Environmental Management Plan and Dust Management Plan will be prepared for the Proposed Development and agreed with LBHF prior to the commencement of any on-site works. These will set out measures to ensure that emissions to the environment resulting from the works are controlled.

6.164 Post completion of the Proposed Development a number of mitigation measures are proposed. These include:

- Omission of biomass fuel;
- Appropriate design of the flues to ensure adequate dispersion of pollutants and selection of equipment regarded as Best Available Technology (BAT);
- Incorporation of low-NOX optimisation of the CHP engines and gas boilers, including use of a digital combustion control system and specially modified heads; and

- Regular inspection of the machinery, operation to the manufacturer's instructions, and ensuring that equipment is well maintained.

6.165 It is intended that the Proposed Development will improve air quality in compliance with Policy 7.14 of the London Plan. The sustainable construction of the Proposed Development will help to reduce emissions following best practice guidance in the GLA and London Councils' guidance 'The control of dust and emission from construction and demolition' in addition to taking reference from the Mayor's Air Quality Strategy.

6.166 The Assessment concludes that following the implementation of the aforementioned mitigation measures, the impacts arising from demolition and construction dust generation will be of minor adverse significance and will be temporary and localised in nature. The assessment also explains that the residual impacts of site plant exhaust emissions on the Proposed Development Site and immediate surrounding area during construction are also considered to be of minor adverse significance.

6.167 Post completion of the Proposed Development the assessment concludes that for the heating and power plant (Energy Centres), the impact from the plant during operation of the Proposed Development is predicted to be of negligible significance at the worst affected nearby sensitive receptors. Similarly, the combined effect of the additional road traffic and heating plant is still anticipated to be, at worse, negligible.

6.168 With regards to the operational road traffic associated with the Proposed Development, the assessment predicts that the proposals will have a negligible impact upon the pollutant concentrations at nearby sensitive receptors.

### **Noise and Vibration**

6.169 A Noise and Vibration Assessment undertaken by URS accompanies this Application and is contained within Chapter 13 of the ES and ES Addendum in accordance with Key Principle ENV34 of the ECWKO Draft SPD. The Assessment was carried out to understand the existing levels of noise and vibration associated with the Site and the likely arisings from the Proposed Development to ensure that any detrimental impacts can be appropriately managed and mitigated against, and thus following the guidance of PPG24.

- 6.170 The Assessment concludes that the main noise and vibration sources for the site include traffic passing along Seagrave Road to the west, rail traffic to the east and aircraft associated with planes travelling to and from Heathrow Airport.
- 6.171 The Assessment investigates noise and vibration levels throughout demolition, construction and post occupation. The Assessment concludes that construction noise is considered, at a 'worst-case' operating scenario, to reach up to a 'moderate adverse' impact during periods where construction activities are located close to existing / phased buildings. Mitigation measures to employ 'best practicable means' will be implemented to ensure that potential noise levels are reduced.
- 6.172 Vibration levels during the construction of the Proposed Development are considered to be negligible. Mitigation measures to employ 'best practicable means' will be implemented to ensure that vibration levels are controlled. Particular care will be taken when piling is likely to occur close to neighbouring dwellings.
- 6.173 With regard to noise and vibration from Building Services and Plant once the Proposed Development is complete, the Assessment defines suitable noise limits to control noise associated with Plant within acceptable criteria. In addition the Assessment explains that Building Plant will be designed to ensure that any potential vibration associated with the operation of the Plant will not cause disturbance.
- 6.174 The Assessment also explains that the introduction of the buildings within the Proposed Development will result in a reduction in ambient noise levels towards the centre of the development as they will shield noise associated with road and rail source to the west and east of the Proposed Development area.
- 6.175 It is therefore apparent from the Noise and Vibration Assessment that mitigation measures are proposed to minimise disturbance for the surrounding environment and properties, but also to minimise disturbance to properties within the Site itself in accordance with planning policy 7.15 of the London Plan.

### **Construction and Phasing**

- 6.176 A Construction Management Plan (CMP) will be provided for the Proposed Development. It is intended that this will be secured by planning condition. This will outline how dust will be controlled and monitored, in addition to other construction

related emissions, in accordance with Key Principle ENV9 of the ECWKOA Draft SPD.

6.177 The CMP will also follow the guidance provided within LBHF's Sustainable Construction and Recycling of Building Materials SPD (2007), and demonstrate that the construction activity will not result in unacceptable noise and vibration as specified by Key Principle ENV33 of the ECWKOA Draft SPD.

6.178 With regard to the phasing of the Proposed Development, a Phasing Plan will be provided. Similarly it is envisaged that this will be required by condition. The Phasing Plan will set out the strategy for the construction of the Proposed Development including the accommodation of the decant properties if required.

6.179 If the Proposed Development is required to accommodate the relocation of residents from the Gibbs Green and West Kensington Estates, it is intended that construction will begin for Phase 1 at both the north of the Site with Block A and the south of the Site with Block D to ensure that residents can be suitably accommodated as soon as possible minimising disruption as required by Key Principle HO5 of the ECWKOA Draft SPD. Phases 2 and 3 will therefore involve construction working towards the middle of the Site. The Draft Phasing Strategy for the Proposed Development in the event that the wider Earls Court Development Option (Site Wide) proceeds is outlined below:



Figure 4 Draft Phasing Strategy

6.180 In the base case scenario, Phase 1 will begin at the north of the Site with Block A, followed by Blocks C and E in Phase 2 and Block F in phase 3 working southwards across the Site. Block D will be subsequently provided as Intermediate affordable housing for the acquirement of a Registered Social Landlord.

### **Planning Obligations**

6.181 Section 106 obligations are being discussed with LBHF and the GLA to ensure that the required planning obligations are provided in association with the Proposed Development.

6.182 In addition to providing 200 affordable properties to accommodate, it is anticipated that the Section 106 agreement will include the following planning obligations:

- **Public Transport**

- Financial contributions to improve existing bus stops along Lillie Road;

- **Sustainable Transport Measures**

- Preparation of a Travel Plan for the Site to be consistent with the overarching strategy for Earls Court.
- Provision of 2 on site Car Club spaces.
- Provide Electric Charging Points in accordance with GLA policy requirements.

- **Highway Improvements**

- Streetscape improvements along Seagrave Road.
- Financial contribution to enable footway improvements along Lillie Road by providing dropped kerbs and facilities to aid sensory and mobility impaired users.
- Financial contribution towards the implementation of a wayfinding strategy in accordance with Legible London guidelines. Financial contribution towards improving the off street cycle route towards Fulham town centre.
- Financial contribution towards increased cycle parking in Fulham town centre.

- **Local Employment and Training;**
  - Provisions for securing local employment opportunities during the construction and operation of the development
- **Education Provision**
  - A financial contribution towards existing nursery, primary & secondary education schools in the local area will be provided to mitigate the impact of the Proposed Development.
- **Healthcare**
  - A financial contribution towards existing general practitioners and dentists in the local area will be provided to mitigate the impact of the Proposed Development.
- **Community Facilities**
  - A financial contribution towards existing community facilities in the local area will be provided to mitigate the impact of the Proposed Development.
- **Energy and Utilities**
  - The proposed Energy related infrastructure associated with the Proposed Development will be future proofed in order to enable connection to the proposed Earls Court ESCo at a later date.
- **Construction / Demolition**
  - A Construction Logistics Plan covering issues including noise, vibration, waste, air quality, construction methods, traffic routing will be submitted and secured via the Section 106 Agreement.
- **Servicing**
  - A Framework Delivery & Servicing Plan will be submitted in accordance with LBHF requirements and secured via the Section 106 Agreement.

6.183 It is envisaged that the specific planning obligations will provide for the event of the

Earls Court Development Option (Site Wide) proceeding or not.

6.184 Further information on the proposed planning obligations is included at Appendix 2.

## 7.0 CONCLUSION

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.2 This Updated Planning Statement has assessed the Proposed Development against the Development Plan and other material considerations, including, relevant planning policy and guidance at national, regional and local policy level.
- 7.3 The Proposed Development has the opportunity to create a new residential development, which will result from the comprehensive regeneration of a large brownfield site.
- 7.4 The Planning Statement has described the wide-ranging planning benefits of the Proposed Development and has demonstrated that it accords with both adopted and emerging planning policy and guidance.
- 7.5 Through planning policy there is support for the redevelopment and regeneration of the Seagrave Road Site which falls within the Earls Court and West Kensington Opportunity Area. Opportunity Areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing. The Panel Report to the DRLP explains that Opportunity Areas will be expected to make “*very significant*” contributions to London's housing land supply over the Plan period. The Panel notes that the importance of these areas should not be understated.
- 7.6 The proposals will result in:
- The delivery of 808 new homes (200 of which will be affordable).
  - A catalyst for the comprehensive regeneration of the West Kensington and Gibbs Green housing estates should the wider Earls Court Development Option (Site Wide) occur.
  - The provision of a network of open space.
  - The optimisation of site potential and density.
  - The delivery of high quality sustainable design.
- 7.7 The Viability Assessment submitted as part of the planning application demonstrates

that, on the basis of the wider Earls Court Development Option (Site Wide) not taking place, the maximum reasonable affordable housing that the Proposed Development can support is 25% intermediate housing. This equates to 200 units which would be located in Block D in the southern part of the site.

- 7.8 In the event that the wider Earls Court Development Option (Site Wide) does come forward, the Proposed Development will provide the 200 units in Block D as social rented units in order to enable the first stage of the relocation strategy which will in turn enable the comprehensive regeneration of the Earls Court Site to commence. The viability position of the scheme is such that it is not financially viable to provide any additional affordable housing beyond this level of provision.
- 7.9 The Proposed Development has been prepared having regard to surrounding site context and the core objective of ensuring that the Opportunity Area achieves the appropriate integration with the surrounding areas.
- 7.10 The approach to the height bulk and mass of the proposed buildings has been the subject of detailed townscape assessment. With the overall conclusion that the Proposed Development is acceptable in terms of its visual impact on the existing local environment.
- 7.11 The likely impacts of the Proposed Development have been fully assessed in the original Environmental Statement and the other planning application documents. As a result of a number of changes to the submitted scheme, the revised scheme for the Proposed Development has also been fully assessed in a number of Addendum documents. The outcome of this analysis demonstrates that the Proposed Development is appropriate and will serve to deliver benefits that will regenerate and enhance the Seagrave Road Site, the Earls Court Masterplan area and the wider surrounding area.
- 7.12 The Application proposals have been the subject of extensive consultation. The proposals have sought to respond to and take into account the many different comments and responses received from stakeholders during the pre-application stages.
- 7.13 Redevelopment will bring about strategic change and growth of a substantial brownfield site. It will deliver significant planning benefits, including many new

homes.

- 7.14 The Proposed Development will regenerate a key brownfield site and in doing so will enable economic growth, provide physical renewal of and deliver social improvements to the wider area. In particular, the Proposed Development will enable the comprehensive regeneration of the West Kensington and Gibbs Green housing estates by facilitating the initial decant process.
- 7.15 Overall, the Proposed Development is an appropriate response to the principle of redevelopment and regeneration set out by the planning policy framework. The suite of documents supporting the Application demonstrate compliance with policy in further detail, and set out justification for and benefits of the Proposed Development.

# **APPENDIX 1**


**SECTION 106 HEADS OF TERMS  
SEAGRAVE ROAD**

Topic	Key Matters	S106	Approach
<b>Public Transport</b>			
	Bus Routes (infrastructure & services)	X	<ul style="list-style-type: none"> <li>- Financial contribution to improve existing bus stops along Lillie Road</li> <li>- Payment of any contributions / delivery of improvements to relate to development phasing and occupation.</li> </ul>
<b>Sustainable Transport Measures</b>			
	Travel Plan	X	•Preparation of a Travel Plan for the Site to be consistent with the overarching strategy for Earls Court. Key measures are set out in Section 13.4 of the Transport Assessment which forms part of the planning application submission
	Car Club (spaces and operation)	X	•Provision of 2 on site Car Club spaces.
	Electric Charging Points	X	•Provide Electric Charging Points in accordance with GLA policy requirements.
<b>Highway Improvements</b>			
	Definition and Description of Improvements	X	•Streetscape improvements along Seagrave Road
	Public Realm Improvements	X	•Financial contribution to enable footway improvements along Lillie Road by providing dropped kerbs and facilities to aid sensory and mobility impaired users.
	Temporary Works	X	
	Link with S.278	X	<ul style="list-style-type: none"> <li>•Financial contribution towards the implementation of a wayfinding strategy in accordance with Legible London guidelines.</li> <li>•Highway Agreement(s) to include temporary works to allow for construction and phasing access.</li> <li>•Highway works programme to be defined relative to development phasing.</li> </ul>
<b>Affordable Housing</b>			
	Definition(s)	X	•200 shared affordable housing units will be provided as part of the Proposed Development. If the estate regeneration proposals do come forward, the same 200 residential units will be provided as shared ownership units to accommodate the relocation of residents from the Gibbs Green & West Kensington Estates.
	Quantum	X	
	Location	X	
	Decant Scenario	X	
	Nomination	X	
	Qualifying Terms	X	
	Eligible Households	X	
	Target Rent	X	
<b>Local Employment &amp; Training</b>			

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	Employment During Construction	X	•Provisions for securing local employment opportunities during the construction and operation of the development to be included in the s106.
<b>Education</b>			
	Nursery, Primary & Secondary Education	X	A financial contribution towards existing nurseries, primary and secondary education schools in the local area will be provided to mitigate the impact of the Proposed Development.
<b>Healthcare</b>			
	GP's and Dentists	X	A financial contribution towards existing general practioners and dentists in the local area will be provided to mitigate the impact of the Proposed Development.
<b>Community Facilities</b>			
	Community Facilities	X	A financial contribution towards existing general practioners and dentists in the local area will be provided to mitigate the impact of the Proposed Development.
<b>Energy &amp; Utilities</b>			
	Future Connections to ESCo	X	•Energy network/infrastructure to be future proofed in order to enable connection to the proposed Earls Court ESCo at a later date.
<b>Construction / Demolition</b>			
	Phasing Management Plan	X	•Production of Construction Logistics Plan. Plan to include topics such as: noise, vibration, waste, air quality, construction methods, traffic routing, etc.
		X	
<b>Phasing</b>			
	Phasing Plan	X	•Indicative development phasing plan (and any specific scenarios) to be agree with Boroughs and TfL. •Any temporary phasing provisions to be made clear - particularly with regard to routes, circulation, accesses, highway works, landscaping.
	Phasing Scenarios	X	
<b>Servicing</b>			
	Management	X	•A Framework Delivery & Servicing Plan will be submitted in accordance with LBHF requirements.

