

# Earls Court development proposals

## Comments on the hybrid planning application by local amenity societies

### November 2024

#### **Objection to the proposed development at Earls Court**

All of the main amenity societies surrounding the site, detailed at the end of this paper, object to the hybrid planning application submitted by the ECDC. This paper explains why, despite the proposed benefits, we are objecting. We ask that both planning authorities work with the developer to reconsider the scheme and bring forward more appropriate proposals for the site.

#### **Need for the right sort of housing**

More housing is needed in both boroughs. However, given the excessive amount of development proposed, this scheme is likely to result in high service charges and premium prices well above those in the local market. It is not clear that even the 35% of dwellings proposed as “affordable” will be suitable and within reach of local people who need housing.

#### **The development is far too dense and the buildings are excessively tall.**

##### *Density*

Both boroughs are already very densely populated. In 2023, Kensington & Chelsea was the most densely populated borough in the country, at 73.97 dwellings/hectare and LBHF not far behind at 58.88dph. London is only 24.11 and inner London 50.99<sup>1</sup>.

The Earls Court overall scheme proposes an overall density of 219 dph (=3,900 homes over 17.8 hectares). It is unclear why the [Planning Statement](#) Table 25 states this figure as 173. In LBHF, up to 2,500 homes could be built on the 10 hectares, a density of 250dph (not 201 in Table 25). In RBKC up to 1,400 homes could be built on 7.85 hectares, a density of 178dph (not 137 in Table 25). These densities would create intolerable living conditions and ruin local neighbourhoods.

The greatest density is proposed in the early phases (1-4): 137dph in RBKC and 197dph in LBHF according to Table 25. However, these figures cannot be verified because no figures have been provided for the ground area of the plots to be developed and no detail in the description of phases provided. In the [DAS Volume 3](#), (p63) the plot site for WB03, WB04 & WB05, for which detailed consent is sought, is given as 9,995 sq m, or 1 hectare. With 462 homes and 696 student rooms (counting as 278 dwellings) this equates to 740dph. No plot area figure has been provided for the detailed element EC05 & EC06 in RBKC.

As well as the dwellings used in these calculations, the development also contains a large amount of floorspace dedicated to commercial and other uses, increasing the development density much further. These densities are grossly excessive and out of all proportion to the local area.

The London Plan identified the potential for 6,500 new homes in the Earl's Court West Kensington Opportunity Area of 38 hectares. The ECDC site occupies less than half of this OA but the housing target was set at 4,500 and then reduced to 4,000 by ECDC. The proposed density is therefore significantly above that set out in the London Plan.

The ECDC masterplan occupies 18 hectares, of which, according to Table 25, 55% will not be covered by buildings, and 45% will be used for housing, offices and other uses.

We asked for the density of development of the residential plots (ie the net density) so as to understand densities and make comparisons with other sites, but ECDC would not provide it. We have, therefore had to estimate the average net residential densities.

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<sup>1</sup> 2023 provisional figures, Government Housing statistics.

Based on the number homes proposed, the size the Opportunity Area in hectares, ECDC's estimated site coverage by buildings and adjusting this for scale of coverage by non-residential buildings, we estimate the net residential densities are likely to be an average of over 400 dwellings/hectare in RBKC and over 600 dwellings/hectare in LBHF.

These excessive densities are not compatible with Local Plan policies, such as LBHF's HO4 which requires higher density schemes to be "compatible with the local context....and satisfactory in all other respects" and also specifies the higher density ranges of the 2016 London Plan 'Central' setting (140-405dph depending on size) which are much lower than those proposed for phase 1 in LBHF (740dph).

These densities are also incompatible with the London Plan Housing Policy H1 which requires boroughs to "**optimise** the potential for housing delivery ..... through their Development Plans and planning decisions" - guidance explains that "optimise" does not mean "maximise".

In addition, we are very concerned about the height and bulk of the commercial sites along Lillie Road which would have a significant impact on Brompton Cemetery and scale of development along Lillie Road itself. The density of development in terms of plot ratio or floor area ratio for those plots needs to be provided and examined

### *Building heights*

Even Imperial West Tower, the tallest building at White City (35 storeys/139m), is lower than the proposed 42-storey apartment block HB04 (158m). This building alone, about the same height as the "Walkie-Talkie" building on Fenchurch Street, would dominate local views for miles around.

The Student block WB03 at 112.4m is less than 5m lower than the Empress State building next door and the same height as Battersea Power Station. Even WB05, at 62.2m will be one of the tallest tower blocks in the local area.

The LBHF policy DC3 on tall buildings and Policy FRA on the Fulham Regeneration Area have not set a height/storey limit or specific locations, as is required under London Plan Policy D9, but does set out requirements which these buildings fail to meet: a positive relationship to the surrounding townscape, an acceptable impact on the skyline and on heritage assets, not overshadowing the area or impacting the local microclimate.

The two RBKC commercial/residential towers, at 109m/27 storeys (EC05 - about the height of the South Bank Shell building) & 80.1m/20 storeys (EC06) increase this cluster to 5 very tall buildings and are especially problematic in causing overshadowing.

### *Overshadowing, loss of daylight and local heritage*

Appendix 15.4 of the "Property Scoping Process" contains a daylight report. This acknowledges a significant loss of natural daylight ("VSC":vertical sky component) in Philbeach Gardens, Eardley Crescent, Lillie Road, West Kensington & Gibbs Green estates and the West Cromwell Road.

Appendix 15.10 is the overshadowing report showing the effects by season and by time of day. The worst effects are in the afternoons in the crescents to the east. Within the site, the shading is even worse, especially in the areas east of the Empress State Building, which includes play areas and the central Table Park. Light pollution will also affect the surrounding area.

The ECDC site is surrounded by conservation areas, by the Grade I heritage asset of Brompton Cemetery, the listed West Brompton Station and by Empress Place which is set to be demolished. The existing houses in Empress Place and their gardens should be retained, not just the facades. Undoubted harms to all these areas are inconsistent with the need to "optimise" use of the site in providing housing.

The proposals therefore represent a significant over-development of the site, with tower blocks used unsympathetically to cram in as many units as possible without reference to the local neighbourhood, contrary to London Plan and Local Plan policies discussed above.

### **Access to the site, transport and connectivity**

Vehicle access points between 50m and 80m away from WB03, WB04 & WB05 back entrances will be too far away for some users and at night (p 215 of the Design Code). The rationale for a largely car-free development must allow convenient access by taxis, visitors, deliveries, workmen etc. Bookable parking spaces for tradesmen/removals/disabled visitors are also required.

Although access to public transport is high, there have long been concerns about levels of crowding on the underground and, now, at the stations. The opportunity needs to be taken to install step-free access, especially at West Brompton. Overcrowding on the platforms, lifts and escalators at Earls Court needs to be addressed. There is also the opportunity to improve connectivity between the east-west underground services and the north-south West London Line, as an alternative to West Brompton.

As Transport for London is partner in this project, any eventual overall consent must include a S106 agreement package that will deliver these improvements before occupation of the buildings. No commitments are made in the application in relation to any of these stations (planning statement 5.72-5.79).

We are also concerned at the impact of the development on the narrow Lillie Bridge both during construction and afterwards. This does not seem to have been addressed.

Road use projections fail to recognise the surrounding roads are already at saturation. Essential road junction remedial work proposed does not deal with the peak construction period.

### **Social Infrastructure**

The combined size of the Opportunity Area will also require a very significant S106 package for a range of social infrastructure, such for education and health.

### **Public open spaces are inadequate and will come too late**

The only certain information on landscaping is for the areas immediately around the five phase 1 buildings where detailed consent is sought. These spaces, heavily shaded and subjected to strong winds, will be used largely as children's play spaces.

Detailed consent is not being sought for the main public open spaces, so these might come later. But these spaces must be material considerations for deciding on phase 1 and need to be available from the start. The Planning document states that c 8.25 hectares of the whole site would have no buildings. However, much of this would be roads/walkways. The largest space, Table Park, would be only ca 0.7 hectares<sup>2</sup>, which is half the size of Parsons Green and smaller than nearby Philbeach Gardens (1 hectare). Lillie Sidings Square would come much later. Other spaces, eg Warwick Square and Brompton Square are smaller still and there is no certainty if or when they would be provided. The public space proposed is clearly too little and too late and fails to meet RBKC Local Plan policy SA2, which requires a new public park of 2 hectares.

### **Design quality is disappointing**

Using different architects for each building has had the effect of reducing coherence across the site. There are no unifying features to bring a sense of place. We are also disappointed at the absence of visually appealing buildings, especially the proposed landmark towers.

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<sup>2</sup> Planning Document para 7.240

## Where is the wonder of Earls Court?

The cultural spaces are relatively small and divided. It is difficult to see anything to attract an anchor cultural institution, such as a museum or theatre company. This seems to be a missed opportunity resulting in a generic mixed-use development that could be located anywhere.

## Other environmental impacts need more consideration

There is a particular concern that this development will overwhelm the local sewerage systems, especially Counters Creek which is already subject to flood risk. The effects are likely to be felt in Fulham, downstream of Earls Court. With an average water use of c1,000l/p/d, the effects will be considerable even if rainfall is captured and reused in the landscape.

The water supply to the site is dependent on the relocation of the Lillie Bridge Depot which cannot be the 'base case' since this depot is critical to the functioning of the Tube network.

Most of the green space in the required "urban greening factor" is split among different roof spaces, with soil depth of 6 inches or less. These spaces will support little variety of vegetation and most will suffer wind exposure and shading. The amenity value to residents will be small.

The impacts of construction over 19 years would be severe and could overwhelm the area.

## Organisations supporting this statement

The Kensington Society  
The Hammersmith Society  
The Fulham Society  
The Earls Court Society  
The London Forum  
Lillie Road Residents Association



The Kensington Society



The London Forum  
of Amenity & Civic Societies