

Earl's Court and West Kensington Opportunity Area Risk Assessment

- with thanks to local resident Duggie Fields for his memorable SAVE EARLS COURT artwork

Introduction

At a press conference held in the House of Commons on 7th February 2014, the combined panel of Andy Slaughter MP, Darren Johnson AM, Murad Qureshi AM, Karim Halwagi, CEO AEO and Cllr Linda Wade — as well as Caroline Pidgeon AM via an additional statement — were all agreed that the circumstances surrounding the Earl's Court Masterplan present us with a 'perfect storm', which will impact adversely on the local, London-wide and national economy. It is very clear that numerous key areas will be impacted negatively: the economy, employment, housing, culture, transport, environment and population health.

Those of us who put our names to this document now ask the question. Can West London withstand such an assault?

This document will put these plans in the local, regional pan-London, national and even international context.

Notably there was no Area Action Plan, nor a proper impact assessment forthcoming from either of the councils, who, we feel have sold out their communities for a fast profit. No public inquiry has been allowed despite the fact that the £8bn, 77-acre, 20 years development is the largest such redevelopment in Europe, which is seemingly designed purely to create yet another underused 'buy-to-leave' enclave for the super-rich, to the huge detriment of West London — and beyond...



Requests for an Area Action Plan and a proper, independent Economic Impact Assessment have been met with only one response – a negative one that information and ‘consultation’ to-date was ‘sufficient to protect local concerns’. Calls for a public inquiry have been ignored.

On March 28th 2014, Capco and TfL entered into a Joint Venture Partnership, telling the world that they would now be able to proceed with dismantling a whole neighbourhood as well as demolish an iconic masterpiece building. As the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 seeks to stifle all forms of informed campaigning, may we take this opportunity to conduct our own impact assessment and share this with everyone who will listen.

Supported by:

Earl’s Court Area Action Group Committee: Linda Wade, Lesley Raymond, Jack Bovill and Joseph Hegarty.

Cross party opinion

Andy Slaughter MP

Darren Johnson AM

Nicky Gavron AM

Stephen Knight AM

Murad Qureshi AM

Caroline Pidgeon AM

Cllr Linda Wade

Business community :

Karim Halwagi, CEO Association of Events Organisers

Joubin Hormouzi; Luca Volembini, Rocco Restaurant; JA Khan, JMS Food; Jean-Luc Burin, Mail Boxes;

Freddy Msetfi, Mr Wing; Luigi Colazzo La Pappardella; Salvatore Frisina, Dall’Artista Restaurant;

Altjon Gjoni, Earl’s Court Tavern; Deena B., Deena B. Café; Valmir Silva, Anchor Trust; Ken Salijevski, Pizza@Home;

Spencer Parsons, Boka Hotel; Shahid Dar, Churchill Cars.

Local residents from LB Hammersmith & Fulham and RB Kensington and Chelsea.

Jonathan Rosenberg.

Report : J Bell

Area Profile

In 1979, Sir Horace Cutler, the Conservative leader of the Greater London council in announcing that £5 million was being provided to sustain and improve Earls Court said:

“It is tangible proof of the GLC’s total commitment to retaining and encouraging major exhibitions and conventions in London.

It is also evidence of our support for Earls Court in particular. The £5 million that the GLC is injecting will, together with money and expertise from the Earls Court management, ensure that operations go on here for some considerable time.”

For many years the land, part of the ancient manor of Kensington, was owned by the Earls of Oxford The name Earl’s Court refers to the Earl of Zetland, who owned the freehold to the land. The idea to use the site for exhibitions came from John Robinson Whitley, a well-travelled businessman with a background in engineering. He held the view that “one of the highest forms of human effort is to extend the knowledge and usefulness of arts, industries and commerce”

<http://www.studygroup.org.uk/Archives/43/Earls%20Court%20and%20Olympia.htm>

The largest draw for visitors to Earl’s Court is the iconic Earls Court Exhibition Centre, opened in the present building in 1937, with its striking Art Moderne façade facing Warwick Road.

Earls Court was selected to be a London 2012 Olympic venue – chosen, according to Lord Coe, Chairman of the London Organising Committee for the Olympic Games, for its west London location and excellent transport links.

“All of this puts Earls Court at the heart of the communities in which they operate, as the 1.5 million visitors, 15,000 exhibiting companies and 300 events that we cater for every year have a sizeable economic impact – in terms of jobs and expenditure.” SOURCE – Earls Court & Olympia Website

Before 1887 Earls Court was waste farmland and a part of the Edwardes Estates. With the introduction of two Underground stations, it became a mass network of rail on derelict grounds.

The second Lord Kensington’s venture to make Counter’s Creek an improved link for commercial freight to the Thames failed and the West London Railway Company bought up the waterway. The Metropolitan District Line Earl’s Court station opened on 12 April 1869.

The idea of introducing entertainment to the area was brought about by Whitley, an entrepreneur who used the land as a show-ground for a few years from 1887. Whitley did not profit from his efforts, yet his desire had decided the future of Earls Court and its purpose in later years. In 1895 a huge observation/Ferris Wheel was created for Imre Kiralfy's 'Empire of India Exhibition'.

In 1935 Earl's Court was sold and the new owners decided to construct a show centre to rival any other in the world and to dominate the nearby Olympia exhibition hall. The plan was to create Europe's largest structure by volume. The project did not go exactly to plan; it ran over budget and was late in completion – also a risk to the contemporary plans which are of concern to the twenty-first century local community.

Designed by architect C. Howard Crane with over 40,000 sq m of space over two levels, Earls Court finally opened its doors to the public for the Chocolate and Confectionery Exhibition on 1 September 1937. The Motor Show and Commercial Vehicle show soon followed. In spite of all the problems in the latter part of construction, the project was eventually completed at a cost of £1.5 million.

Following the construction of Earls Court Two in 1991, this original building became known as Earls Court One

Earls Court One opened for business in 1937 with the Chocolate and Confectionery Exhibition, and was joined in 1991 by Earls Court Two which still boasts Europe's biggest unsupported roof span. Earls Court One and Two together have a total 60,000 square metres of event space and add to these facilities the purpose-built conference centre and the Museum Hall party space can boast a venue and a space for every event.

Over the years, exhibitions included the American Exhibition, 1887. Italian Exhibition in London, 1888. The Spanish Exhibition, 1889. French Exhibition, 1890. German Exhibition, 1891. Empire of India Exhibition, 1895. Empire of India & Ceylon Exhibition, 1896. International Universal Exhibition, 1898. Greater Britain Exhibition, 1899. Paris in London, 1902. International Fire Exhibition, 1903. Balkan States Exhibition, 1907. Old Japan, 1907. Shakespeare's England, 1912 etc

More recently, the venues have welcomed visitors to shows such as the London Boat Show, the British Motor Show, the Ideal Home Show, the London Book Fair, the Great British Beer Festival and the Good Food Show and the Royal Tournament

The walls have resounded to iconic performances from Pink Floyd, Led Zeppelin, Queen, Genesis, David Bowie, Madonna, Oasis, Kylie Minogue, Iron Maiden, George Michael, Elton John and Rod Stewart. The Arctic Monkeys performed there to a packed house as recently as last year.

Earls Court also hosted boxing, gymnastics, weightlifting and wrestling during the 1948 Olympics as well as being designated as part of the 2012 Olympic legacy.

It has hosted the BRIT Awards, and sporting events such as boxing and wrestling contests, and some of the country's largest companies have held conferences and training sessions there.

All of this puts Earls Court at the heart of the communities in which they operate, as the 1.5 million visitors, 15,000 exhibiting companies and 300 events that we cater for every year have a sizeable economic impact—in terms of jobs and expenditure.

A study carried out on behalf of Earls Court and sister venue Olympia London, showed that the two venues together supported £258m of expenditure in their boroughs and over £1.25bn in the London region, and accounted for over 1,000 jobs in the boroughs and around 12,500 in London.”

The study also showed that one in two Londoners visits the venues every year

It is acknowledged that the centres are in need of interior updates in terms of equipment and disabled access, however the cost to such renovations would be minimal in comparison to the costs associated with the delivery of the Masterplan, both in terms of immediate financial costs — both local and national — as well as in terms of great cost to the community, the price of which incalculable.



Throughout this document we make reference to the London Borough of Hammersmith and Fulham | The Royal Borough of Kensington and Chelsea Earl's Court and West Kensington Opportunity Area (the OA) Joint Supplementary Planning Document — March 2012.

2.1 The OA comprises 37.2 hectares.

The land is split between LBHF and RBKC, incorporating land within the Earl's Court Ward (RBKC), the North End Ward (LBHF) and the Fulham Broadway Ward (LBHF). The OA boundary is defined by Warwick Road and the West London Line to the east, West Cromwell Road (A4) to the north, North End Road to the west and Old Brompton Road/Lillie Road to the south.

The Seagrave Road car park is a parcel of land within the OA situated south of Lillie Road bounded by Seagrave Road and the West London Line. 27.8ha of the site is contained within LBHF and the remaining 9.4ha is contained within RBKC comprising the Earl's Court 1 Exhibition Centre, some vacant land along the railway and some buildings associated with Clear Channel advertising

In terms of the strategic context of the OA — the A4, along the north of the OA, is identified in the London Plan (2011) as the 'western wedge'. The Mayor of London has aspirations that this wedge will develop into an important commercial corridor, linking London's largest airport (Heathrow) and the two important commercial centres of The City and the West End.

The White City Opportunity Area, Park Royal Opportunity Area and Kensal Opportunity Area, all north of the OA, are likely to undergo significant regeneration or redevelopment over the next twenty years.

2.39 Much of the OA is located in an area of high flood risk (Flood Zone 3), as identified by the Environment Agency, and the area is susceptible to sewer/storm water and potentially surface water flooding.

In addition, there is an area of biodiversity — a semi-natural green corridor running alongside the West London Line (more or less on the boundary between LBHF and RBKC) which has been classified as a Site of Nature Conservation Importance (Grade 1) in LBHF, although some of the corridor straddles the boundary into RBKC

Local population and housing:

The Gibbs Green and West Kensington estates are two adjacent estates in West Kensington, W14, London Borough of Hammersmith & Fulham. The estates contain 761 homes and close to 2,000 residents.

Georgian and Victorian residential streets

Mansion blocks

Sheltered housing – including disabled community homes

‘These contribute to the urban structure of the area, creating a rich rhythm of terraced buildings and open spaces’

There is an identifiable pattern of open space in the OA’s surroundings. The councils’ document says this consists of :

- formal garden squares which are usually lined on one or two sides by buildings and are predominately ‘semi private’ (Accessible only to those who contribute to their upkeep). However they do provide important public visual amenity
- communal gardens which are usually located between two terraces and shared by the residents of the terraces that define them, As either end of the communal gardens are left open to the street, they also provide public visual amenity
- private rear gardens relating to specific dwellings and accessible only to their inhabitants
Existing playgrounds and recreation areas noted in the councils’ 2012 report:
Ivatt Place Playground — ‘but taking up space’
Gibbs Green Playground
Basketball Court & Basketball Court 2
Shuters Square Playground Vine Square Equipped playground Normand Park Playground
Alice Gilliat Playground — Public playground ‘but adjacent to a housing estate’

- **We note that these words seem to begrudge children an open space & wonder why it is perceived that a playground adjacent to a housing estate is problematic? Likewise the description of formal garden squares is somewhat begrudging.**

Trade and industry:

Historic sites such as the London Underground repair and maintenance base, the Lillie Bridge Depot which has been in the location since the turn of the last century have shared community industrial space with long lived businesses such as the Adel Rootstein mannequin factory which has an international clientele. The Empress Building houses Metropolitan Police Force and TfL staff. Hotels, hostels, cafes, bars and restaurants have built their trade around the Exhibition Centres.

Pubs such as the Prince of Wales, The Pembroke and the Prince of Teck are an established part of this hospitable community. Hotels such as the Boka in Eardley Crescent, directly adjacent to EC1, market themselves directly to exhibition attendees and workers.



The community sits at a confluence of tube, rail and road networks. Local people say that the things they most like about Earls Court are 'transport & amenities' – both of which are now under threat of a socially engineered catastrophe, where a whole community is to be lost on the altar of private profit and personal greed.



The two local authorities refer to the OA as ‘West London’s New Urban Quarter’. As their own 2012 report explains:

There are 19 conservation areas in and around the OA. One of these is Brompton Cemetery. It forms the setting of listed buildings, a registered ‘park and garden’ of special historic interest (Grade I listed) and is Metropolitan Open Land

‘There are Character Profiles or Conservation Area Proposals Statements available for all but 3 of these conservation Areas. These describe the special interest, character and appearance of each area and in many cases they also include constructive design guidelines to help to preserve or enhance them. Therefore, proposals for the OA will be expected to demonstrate due regard to these documents. Furthermore, in light of the significant heritage assets surrounding the OA, particular attention must be paid to Planning Policy Statement’

The proposals for ‘Planning for the Historic Environment (2010)’ cite the following areas:

Philbeach Conservation Area; Nevern Square Conservation Area; Earl’s Court Square Conservation Area;
Earl’s Court Village Conservation Area; Courtfield Conservation Area; Brompton Cemetery; The Boltons Conservation Area;
The Billings Conservation Area; Sedlescombe Conservation Area; Walham Grove Conservation Area; The Walham Green Conservation Area;
Barons Court Conservation Area; Queens Club Gardens Conservation Area; Turneville/Chesson Conservation Area; Olympia and Avonmore
Conservation Area; Dorcas Estate Conservation Area; Fitzgeorge and Fitzjames Conservation Area; The Gunter Estate Conservation Area;
The Edwardes Square/Scarsdale & Abingdon Conservation Area

Clearly there are a significant number of streets and locations in the designated OA where owners and dwellers should necessarily expect a particular quality of life

There are a number of buildings of historic interest and industrial merit, from the 1828 canal bridge, to the Brompton Cemetery, which covers 16.5 hectares and is one of the finest cemeteries in the country. Managed by The Royal Parks under contract from the Secretary of State for Culture, Media and Sport, it is the only Crown Cemetery.

Consecrated by the Bishop of London in June 1840, it is one of the Britain’s oldest and most distinguished garden cemeteries. Some 35,000 monuments, from simple headstones to substantial mausolea, mark the resting place of more than 205,000 burials. The site includes large plots for family mausolea, and common graves. Brompton was closed to burials between 1952 and 1996, but is once again a working cemetery, with plots for interments and a ‘Garden of Remembrance’.

The cemetery was designed to give the feel of a large open-air cathedral. It is rectangular in shape with the north end pointing to the northwest and the south end to the southeast. It has a central “nave” which runs from Old Brompton Rd towards the central colonnade and chapel.

It is listed as Grade II* in the English Heritage Register of Parks and Gardens of Special Historic Interest in England Register of Parks and Gardens and five of the individual monuments are listed as Grade 11 — the last resting place of significant people from history such as Emmeline Pankhurst, Henry Augustus Mears, founder of Chelsea Football Club and the tenor Richard Tauber.



The Masterplan will result in this unique resting place and treasured heritage asset being overshadowed by 28-storey high tower blocks, destroying the natural light and interfering with the habitat.

‘I would like to see Earls Court preserved’

Sir Malcom Rifkind, MP Kensington

Schools:

The current primary and nursery school provision in both RBKC and LBHF is to capacity. However, well-regarded local schools are concurrently being taken out in favour of Free School provision, which have been factored into the plans, but not in a way, which meets community need.

There is an unmet demand for primary school places in Hammersmith & Fulham, however the highly regarded Sullivan School is to close in order to make way for a secondary Free for Boys, for whom there is already an excess of places. The Fulham Boys School will be temporarily housed on the current school site on the Estates before moving to the Sullivan School site — thus two well regarded and desperately needed local primary schools are to be hit by the development of one excess to requirements boys secondary Free. It is true to say that this is increasingly been seen as a key indicator of a social engineering agenda perpetrated by the local authorities.

The former Gibbs Green primary school is located within the OA. This is currently being used as temporary accommodation by a special school. It's future is at present uncertain.

Medical facilities and hospitals:

Within the OA itself there is a GP facility located at 82 Lillie Road, which provides 10 consulting rooms. As part of NHS Hammersmith and Fulham's Estate Strategy, a new Centre for Health has opened on North End Road opposite the OA. This facility provides 1,200sqm of health floor space and 10 consulting rooms and has been provided in order to facilitate the relocation of other GP facilities in the borough rather than increasing healthcare capacity in order to meet the needs of any regeneration proposals in the area.

*London Borough of Hammersmith and Fulham | The Royal Borough of Kensington and Chelsea Earl's Court and West Kensington Opportunity Area (the OA)
Joint Supplementary Planning Document — March 2012*

The recent announcement for the plans to downsize the very popular and well-regarded Charing Cross Hospital, which is also used by local people, will impact further. It is of great concern that patients will be expected to divert to Chelsea and Westminster Hospital and St Mary's Paddington, which currently struggle to keep up with existing demand.

Meanwhile developer Capital & Counties PLC (Capco) plans to introduce a private hospital into the Earl's Court and West Kensington Opportunity Area — which is not an appropriate facility for those who are entitled to and indeed prefer to access good quality free at the point of need NHS services as they do at present.

Thus we have a clear projection of insufficient and overstretched NHS services with only an emphasis on private care to supplement demand.

ECONOMIC IMPACT

With 1.5 million visitors, 15,000 exhibiting companies and hundreds of events yearly, the Earls Court Exhibition Centres have a sizeable economic impact on the London and UK economy — generating over £1.25 billion per annum in trade and employing 12,500 people in London alone, bringing in £258 million per annum to each of the two local boroughs and forming a significant proportion of the UK exhibitions industry which in 2010 generated 0.4% of our GDP. The loss of revenue to the national economy over the forthcoming years of lost trade will be somewhere in the order of £25 billion.

- 2.79 the Exhibition Centres attract approximately 3million visitors and 30,000 exhibitors each year. This major attraction makes a significant contribution to the local community, benefiting local hotels, restaurants, bars, taxi firms and local business who have adapted to cater for the needs of the exhibition centres
- 2.80 there is a high concentration of hotels within the vicinity of the OA

London Borough of Hammersmith and Fulham | The Royal Borough of Kensington and Chelsea Earl's Court and West Kensington Opportunity Area (the OA) Joint Supplementary Planning Document — March 2012

- **It is clear that the loss of the centres will stifle business from across the globe and our export economy, damaging not only the immediate locality, but both London and the UK's leading role in the exhibitions and events industry.**

At a time when growth is so badly needed, London is already losing out to competitor nations. Just as countries with foresight subsidise and expand their event and exhibition space, this plan will take out the revenue, which Earls Court generates.

The other options of Olympia and ExCel do not meet the need for exhibitors such as the London Book Fair, which returned to Earl's Court in 2007 following demand from both exhibitors and visitors being dissatisfied with the location of ExCel — considered the alternative to Earls Court, is 36th in the world rankings, whereas Paris has two venues in the top 10.

One third of the turnover of local businesses is dependent upon the exhibition centres. 70% of hotel space is taken up by EC customers. The local authorities say they believe these will be turned into residences, but local hoteliers state that it is more likely that they will become hostels as this retains their land value within their own companies. However this will not enhance the nature of the community.

Even the additional rail allocation at Olympia has not been thought through – it will not operate in line with the timings of events attendance.

There are already signs of the impact of the development with local businesses closing, which is changing the feel and look of our high street, resulting from a planned reduction in exhibitions by site owners Capco — a sure sign of huge future losses in our community infrastructure.

Joubin Hormouzi explained to a meeting in the House of Commons in June 2013 how the increase in rent by Capco plus reduction in customers due to running down of the Earls Court exhibitions has bankrupted his elderly mother. She subsequently left the country suffering heart problems resulting from stress and having to seek help from other family members.

High Street names such as Carphone Warehouse, Holland & Barratt, Nando's, Byron's and the Gourmet Burger Bar state that if they don't meet their target marketing figures their local branches will close.



The additional structural upheaval of the Lillie Bridge Depot will tear the heart out of the skilled workforce and our local industry as well as put the safe running of the Underground at risk. This workforce, as well as those of other local industrial bases, are also users of local trade.

Karim Halwagi, CEO of the Association of Events Organisers:

“The loss of Earls Court will have a major, major impact.

At a time of deep economic recession, the exhibitions industry is a shining example of national resilience and economic growth. The events economy expanded by over 18% from £9.3BN to £11BN between 2005 and 2010 and this uplift occurred during the worst economic recession in recent years.

The year on year growth of the Exhibitions Industry even at times of recession is testament to the dynamism of the industry as a whole. There will be an immediate loss of £25 billion over 20 years of the construction timeframe. The assumption that other venues can absorb all this is frankly naïve. Instead, we have members who are planning to expand business abroad to countries like Germany who fully appreciate and understand the exhibitions industry and its impact to their economy.

Now our exhibitors will increasingly need to spend time abroad due to loss of suitable space in the UK — we need more venue space not less.

We must ask why, in the midst of a property-busted recession, should anybody be allowed to destroy a sustainable, profitable, commercial, global brand, which generates thousands of jobs and maintains hundreds of businesses, to develop luxury flats for speculative gain? Flats, that most likely will end up in the hand of foreign investors and which are unlikely even to be occupied? What is more likely to sustain economic recovery: business and creative industry or property and financial speculation?”



HOUSING IMPACT

With what would the developer and the local authorities replace the exhibition centre?

The answer is luxury flats.

— there will not be one single home available to middle and lower income residents on the site, but there will be 1,324 luxury homes in massive apartment blocks.

(Local resident)

Once again, let us take our initial point of reference from the Earls Court | West Kensington Opportunity Area (the OA) Joint Supplementary Planning Document — March 2012 (Housing Strategy London Borough of Hammersmith and Fulham | The Royal Borough of Kensington and Chelsea)

- 3.6 The Gibbs Green and West Kensington estates will be regenerated, with existing residents benefiting from greater housing choice, and higher quality, more suitable homes, designed with their needs in mind
- 5.16 Direct ‘like for like’ re-provision of the social housing in the Gibbs Green and West Kensington estates would not address current issues of overcrowding and hidden households or necessarily meet the housing needs of existing tenants. LBHF will require any regeneration proposals to provide for the housing needs of the estates’ existing tenants and to provide sufficient housing options for those existing leaseholders and freeholders who wish to stay to have the opportunity to purchase an equivalent property (in terms of bedroom numbers) to their existing property.
- 5.30 The Mayor’s London Plan (2011) Policy 3.8 states that “Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments”
 - **‘Like for like’ and ‘greater housing choice’ is a gross misrepresentation of the fact that families with houses and gardens are being offered only apartment block accommodation. Tenants with large rooms and panoramic views are being offered much smaller accommodation with minimal space, storage, or window allocation.**

5.4

The Mayor's London Plan (2011):

'Optimising Housing Potential' (Policy 3.4);
'Quality and Design of Housing Developments' (Policy 3.5);
'Large Residential Developments' (Policy 3.7);
'Housing Choice' (Policy 3.8);
'Mixed and Balanced Communities' (Policy 3.9);
'Definition of Affordable Housing' (Policy 3.10);
'Affordable Housing Targets' (Policy 3.11);
'Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes' (Policy 3.12);
'Affordable Housing Thresholds' (Policy 3.13);
'Existing Housing' (Policy 3.14).

- **Despite the borough's stated intentions for the OA to fall in line with the London Plan, the evidence is already with us as the Earls Court Masterplan falls outside those objectives, as apparently intended.**



'when they say we will have a genuine choice of homes, they must think we are too stupid to notice that their words are so far away from reality they are forcing through. It's obvious that they don't care one jot about most of the people in the area.'

Local resident

The People's Estates

Residents from two thirds of households are members of West Kensington & Gibbs Green Tenants & Residents Associations, the association set up by residents to take over the ownership of their estates.

On 8 December 2009, the West Kensington & Gibbs Green Tenants & Residents Associations served a S34A Notice on the Chief Executive of Hammersmith & Fulham Council proposing their estates be transferred to a resident-control community housing association.

West Kensington and Gibbs Green estates contain 761 homes occupied by a diverse and settled community of nearly 2,000 people. This is a mixed neighbourhood of council tenants, housing association tenants, leaseholders, freeholders and private tenants.

The Gibbs Green estate, which was completed in 1961, contains 100 homes in six five-storey blocks. West Kensington estate, which was completed in 1974, contains five blocks ranging from seven to ten storeys along with 200 homes made up of houses and maisonettes.

Over the past 15 years £20 million has been invested in the estates on major repairs and improvements including external works such as new roofs, play areas and landscaping and new bathrooms and kitchens which have brought the estates up to Decent Homes standards. In the past two years the Council has spent over £1 million improving fire safety in the West Kensington blocks.

There are 58 housing association houses across both estates, most of which are just 15 years old. These along with the houses on West Kensington include small private gardens and many houses have their own off-street parking.

There is a large amount of green and play space with trees spread throughout both estates. Shopping, transport and recreational facilities are all close at hand with ample parking for residents and visitors. There is a strong sense of community on the estates and more widely. Friends and relatives live on neighbouring estates: the market, shops, pubs and eateries on North End Road act as thriving and affordable meeting places for local people.

In February 2009, the then Leader of Hammersmith & Fulham Council, Stephen Greenhalgh explained to estate residents at a public meeting why he wanted to bulldoze their homes: "We want to attract people who are very rich". In June, the Council stated: "the area does not fulfil our expectations of a decent neighbourhood: we think that redevelopment should be considered to establish mixed and balanced communities".

In Autumn 2009, residents from 83% of households signed a petition calling on the council to abandon its plans to sell off the estates for demolition allow people to determine their own future. The Tenants & Residents Associations for the two estates gave notice to the Council that they intended to use S34A of the 1985 Housing Act to transfer ownership of the estates to a resident controlled housing association.

Then and subsequently, the residents made it plain to the Council and the developer that they opposed demolition and forcible relocation and instead wanted to be empowered to take more responsibility for improving the area and helping their neighbours.

During 2011, residents formed West Ken & Gibbs Green Community Homes, signing up neighbours from two thirds of the homes on the estates as members. In 2012, in response to the Council's formal consultation on the proposed sale and demolition of the estates, 80% of residents responded by expressing their deep-felt opposition to the plans, explaining how much their homes and their community meant to them. In April 2013 residents from 60% of the homes signed a petition to the Secretary of States for Communities and Local Government calling on him to refuse permission for the Council to sell their estates for demolition. The campaign has been chronicled throughout by Dave Hill of the Guardian who has written around 90 articles detailing the twists and turns of the public authorities and the developer hell bent on displacing the community to make way for a concrete jungle of 7,500 flats where starting prices for a one bedroom apartment will be £600,000.



Dieppe Close 'Lifetime Homes' – just 10 years old and set for demolition -



- the very green and pleasant Gibbs Green Estate

Housing Impact Summary

At a time when London is in the grip of a housing crisis for all but the most affluent, the Masterplan does not provide sufficient affordable housing and the plans for social housing are woefully inadequate to local need — ‘indeed they are a poor replacement for the existing decent homes, many with gardens, which populate the Gibbs Green and West Kensington Estates.

Currently 33%+ of local residences are leasehold and freehold. 10% + of the population are not in secure tenancies, housed in short term lets, homeless hostels, temporary tenants and notional secure tenants.

LBHF plan to generate £120m through the sale of properties £40m - £40m - £20m - £20m < sell offs and demolitions over a 4-year timeframe with 50% of that going on the Earl’s Court scheme in costs such as buying up land for redevelopment, staffing costs etc.

So far the Council has engineered the demolition of 500 council owned homes in what Andy Slaughter calls a ‘policy of attrition’, which socially engineers families out of the area while replacement properties are sold to private landlords via the developer at a huge profit — they then charge higher rents on the open market. He believes only a fraction of the existing residents will eventually be re-housed in the area, a phenomenon already apparent in the Heygate Development in Southwark.

SW5 and SW6 postcodes contain high value housing stock integrated with social and affordable homes. Despite its reputation for having a transient population, many residents have lived in the area for decades. Compensation packages are not equally applicable between residents of each of the two local authority areas to be impacted. Residents of Earl’s Court suffer from loss of light, and the impact of dust and nuisance from demolition works, vibration and overnight noise, loss of amenities and loss of value during the resulting mayhem for the best part of 20 years.

The destruction of decent homes and established communities such as the Gibbs Green and West Kensington Estates in Hammersmith — and the minimal replacement of said properties, leaving the occupants in lesser quality housing and little chance of finding like for like elsewhere in the capital.

This will also result in an increase in the Housing Benefit bill when tenants need to take up alternative places in the private market where the ‘less for more’ rule applies

Those with freehold land and assets who have already been impacted also cite great stresses and concerns.

In particular, but not exclusively, this will not meet the needs of families who are currently in homes with gardens and other facilities



Replacing existing facilities and the surrounding well established and thriving community with buildings for which it is clear from other similar developments in London there is only a limited demand for residential purposes, brings with it a very well founded fear that if these plans come to pass the Earl's Court community will be reduced to nothing but largely uninhabited tower blocks owned by wealthy buyers from Asia and Russia, surrounded by a decimated locality Now that the Mayor has taken over control of the rented housing market, undoubtedly resulting in more families being forced out of the capital, SW5 will become a watchword for urban desert.

The sheltered housing for a disabled community of 30 people sited across the rail track from West Brompton train station is to be demolished and with no plans for relocation as a unit — or indeed singly. Where will residents go? This is just one example of the careless attitude, which the local authorities and CapCo have exhibited to vulnerable local residents.

Such housing stresses occasion additional need for support from the NHS— both in terms of the development of mental health and anxiety conditions and the exacerbation of physical conditions.

The deliberate reduction of London's social and affordable housing stock, along with the undermining of local small businesses and replacing them with investment properties marketed overseas was revealed by Ernst and Young as significantly contributing to a pending London housing bubble. A review of the Masterplan and other similar developments in the Capital could help to turn this round.

The acknowledged trend in the capital, enabled and encouraged by the current mayoralty to develop a high proportion of market value properties and to market them abroad, leaving current Londoners — or those who find work in the Capital, or who need to live in the Capital for other reasons, without access to suitable housing

The list includes Earls Court Masterplan at 79% market value properties, 10% Social Rented housing (a minimum replacement requirement) and 11% so-called Affordable Intermediate, which can be set at anything up to 80% market value — many of the new market value properties in this plan being several millions each.

Of the 7,600 new units, only 760 are to be social housing units (this are replacements) — tower blocks to be built on the Seagrave Road Car Park, which has hitherto acted as an important resource for both exhibition attendees and exhibitors.

4.69 Clusters of tall buildings can be attractive as they can provide context for one another.

- **However where residents have a preference for a different type of property and also a desire to preserve natural light in their locality, this is not a desirable outcome.**

740 properties on the development are to be developed as so-called Affordable Intermediate shared properties where purchasers can pay up to 80% market rate, however it is estimated that purchasers will need to earn in the region of £70-80k in order to organise a mortgage.

The remaining 5,500 properties are to be high cost 'market homes', targeted at foreign buyers.

In addition the Empress State office building will be converted to 500 living units. Of the 802 planned for Seagrave Road, 200 will be the first instalment of Social Rent housing decants from West Kensington & Gibbs Green Estates.

A total of 7,583 new homes are planned — of which barely 21% fall into the Social and Affordable range, whilst the glut of under occupied 'market' properties will only result in creating an unwelcoming and even inhospitable environment.

Add to this the plans for additional retail outlets of the type that are already struggling in Kensington High Street following the opening of Westfield, then the area could ultimately become a ghetto and with many property and business owners in negative equity.

Ultimately if there is a glut of homes which are not marketable due to oversupply a lack of support infrastructure, transport insufficiency and poor air quality, then the property prices will fall and the tower blocks could become the slums of the future. The developers Capco market this area as a village — however as local people point out, the plans bear absolutely no resemblance to a village whatsoever in height, scale, massing and density.

It is easy to see that this now vibrant area with a strong social history should never be turned over to this development — there is no rationale for these plans within the lexicon of the community regeneration tradition.

Indeed the downward spiral has already begun. Local businesses are already suffering and will have to compete in a very different environment from the one in which they established themselves.

The Borough councils are convinced that hotel owners will convert to residences—however they will not, but choose instead to convert to hostels if they stay. Once a hostel, a property cannot convert back to a hotel.



Spencer Parsons at the Hotel Boka, Eardley Crescent

- which backs directly onto EC1

This is creating urban ‘super rich ghettos’ full of buy-to-leave properties — already apparent and increasing, or properties let out at very high rental rates. It is and will play a significant part in exacerbating a more unequal society — which is known to have wide ramifications on the national economy and wellbeing.

CULTURAL IMPACT

The history of the Earl's Court area is one of a vibrant cultural quarter – forming West London's hot spot of cultural innovation and the celebration of human creativity.

- 3.3** The new urban quarter will capture the spirit of this part of London by continuing the legacy of the Earl's Court 'brand' with a new cultural destination that will continue to draw visitors from across the Capital.

Earls Court | West Kensington Opportunity Area (the OA) Joint Supplementary Planning Document — March 2012

- **despite these words, it was only within the past few weeks that the developers announced that they would identify a small area of the OA to house a so-called culture building. The dimensions of this are to say the least, not generous - and the design as yet unknown.**



'The bad planning that has emptied the capital's heart' has lately been written about by Kensington and Chelsea resident, Simon Jenkins.

Likewise, fellow author and broadcaster and local resident Peter York has dubbed the Earls Court Masterplan *'the first big roll out of the horrible things that have been happening in Central London where whole areas have been hollowed out solely for development gain'*

Cultural Impact Summary

The Earls Court Exhibition Centre has garnered iconic status for very good reason. World-class performances, which mark the iconography of the pop and rock world are contained within the history books of the venue.

The planned demolition of the iconic landmark Earls Court Exhibition Centres is nothing but cultural vandalism. Far from being a façade, the authentic Art Moderne building represents the visual heart and hub of a community and is vital to the life-blood of the London economy. Imagine demolishing a great cathedral? It wouldn't even be considered. The sudden out of the blue proposal for a significantly smaller 'cultural' building, does not remotely offer compensation for this brutal loss.

Trade shows, product fairs, artists, musicians and performers hold this venue in high esteem because it offers an unrivalled space in a central location that draws crowds from around the world. The substantial loss of income to local traders and to London as a whole is inexcusable.

London is known as a world city. The capital is filled with buildings of cultural interest and many with national heritage and world heritage status.

Recent property developments have put these acknowledged heritage status buildings at risk of losing said status — including the world renowned Tower of London, which will impact adversely on the capital's lucrative tourist trade.

The iconic Earls Court Centre dates back to 1937, it offers a rich history in 20th and current century culture —with an international status, including a wide range of music industry performances, Olympic events, exhibitions etc.



In November 2013, a total of 30 cultural icons including Holly Johnson, Neil Tenant, Bella Freud, Tracey Ullman, Barbara Hulanicki, Molly Parkin and Ozwald Boateng put their names to a letter protesting the plans to demolish the centres.*



Reference to Jonathan Prynne's *Evening Standard* piece 'Celebrities line up to condemn plans' demonstrates the emerging breadth of realisation and awareness of the impact, not just to the immediate community, but also to the wider world in terms of lost heritage <http://www.standard.co.uk/news/london/celebrities-line-up-to-condemn-earls-court-demolition-plans-as-cultural-vandalism-8969136.html>

Just a few weeks before the letter was published, the Arctic Monkeys had played in the Earls Court 1 to an international audience.



Celebrities line up to condemn Earls Court demolition plans as 'cultural vandalism' :

"The planned demolition of the iconic landmark Earls Court Exhibition Centres is nothing but cultural vandalism. The authentic Art Deco building represents the visual heart and hub of a community vital to the life-blood of the London economy. The venue attracts on an international scale, with a history of millions of visitors and crowd-drawing events on the world map...Trade shows, product fairs, artists, musicians and performers hold this venue in high esteem because it offers an unrivalled space in a central location. The substantial loss of income to local traders and to London as a whole is inexcusable.

Nothing about the so-called Masterplan is culturally beneficial for either the neighbouring community or for the long-term economy. These pseudo-parochial planned developments, set to become the slums of the future, look nothing like 'villages'.

London's skyline is already at risk according to UNESCO and yet the shameless glut of millionaire properties continues. It is a scandal that will scar London forever and a bubble that will have to burst in the near future, as it has done before, inevitably.

A far more modest spend on the building's interior would guarantee the Earls Court heritage for the long-term future, yet this plan is being ridden through roughshod by the London Borough of Hammersmith & Fulham and the Royal Borough of Kensington & Chelsea councils. Moreover the London Assembly passed a motion condemning the Mayor and the Secretary of State's roles in supporting the proposals on 9 October 2013.

Not only social engineering but also a divisive discrimination against the cultural industry is clearly apparent. London deserves far better.

Cultural community:

Duggie Fields
Neil Tennant Holly Johnson Bella Freud Alannah Currie Ozwald Boateng Lady Mary Rose Beaumont Jeremy Thomas
Zandra Rhodes CBE
Steve Thomas Guy Henry Ben Langlands & Nikki Bell Baroness Ruth Deech DBE Brian Clarke
James Birch Richard Salmon Amanda Eliasch Mark Stephens CBE Andrew Loog Oldham
Jenny Dearden The Reverend William Whitcombe

London *EVENING STANDARD* 28th November 2013

It is noted that a relatively small level of expenditure on improving the internal facilities of the centres would both preserve the building and the local culture as well as creating more flexible use and at the same time enabling exhibitors such as the Ideal Home Exhibition and the Book Fair remain in their venue of choice.

Public enquiries have been allowed on a proportion of developments proposed to-date, including Smithfield. However, they have been refused where Earls Court is concerned which does not bode well for similar projects which are likely to emerge elsewhere in London if Clause 5 of the TfL Bill is enacted.



www.saveearlscourt.com

Local resident for over 40 years and internationally renowned artist Duggie Fields said:

“Nothing surprising and certainly laughable to read that it has been ‘carefully considered’...but then it is being ‘considered’ by people who can’t think of consequences beyond the instant money fix that they are so dazzled by.



The impact on the wider community is something that they refuse to consider, leaving the mess created for the future when they won’t be around to be held responsible. Arrogant, un-principled, short-termism currently happening all over London now under this foolish regime.”

As Helen Goodman, Shadow Minister for Culture Media and Sport asked the Minister in Westminster Hall on January 21st

‘Does (he) not think that will make London an intensely boring city?’

— which immediately highlights the assault on the cultural heritage of not just the Earl’s Court area, but also of the vibrant Capital itself.

TRANSPORT IMPACT

Earl's Court is already an area challenged by an overloaded demand on existing transport networks — including key arterial routes.

These plans will put an intolerable strain on road and Tube networks in particular.

Once again, it's timely to use the Hammersmith & Fulham Council and Royal Borough of Kensington & Chelsea 2012 report as a point of reference, which only serve to illustrate both the existing and projected concerns about both overcrowding on the rail and tube network as well as of traffic congestion

- 2.33 All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancements. In addition crowding will increase to over three people per square metre on all southbound services to West
- 10.6 All services on the West London Line currently suffer from a high level of crowding during the AM peak period with all northbound services and southbound Southern trains services having crowding levels in excess of four people per square metre. This level of crowding will remain the same in 2031, despite significant capacity and frequency enhancement
- 10.36 By 2031 passenger movements into and out of Earl's Court station in the AM and PM peaks will be at least 20% higher than existing movements (2009 figures). Development would add an additional 10% in both peaks.

All the boundary roads carry very high levels of traffic and operate at or near capacity in peak periods. The dominant traffic flows are east west on West Cromwell Road (around 6,000 vehicles in the peak periods) and north south on the ECOWS (around 2,000 southbound and 1,000-1,500 northbound).

There are a significant number of traffic delay 'hotspots' in and around the OA, including at all four corners of the site, during both peak periods as well as the weekend. This is particularly apparent at the West Cromwell Road junctions with Warwick Road and North End Road, the whole length of which is subject to delays. Delay is generally highest during the PM peak period, particularly on West Cromwell Road between the Warwick Road and Earl's Court Road junctions

- **Train routes are under stress due to Earl's Court overload with construction workers and a lack of passenger capacity at Olympia.**

Transport Impact Summary

After two years of argument, in February '14, TfL lost its' move to obtain permission to dispose of any of its lands across London that it chooses. Reprimanded in the Bill Committee for wasting years of legislative time by being unprepared, they were forced to drop Clause 4 of the Bill due to pressure from West London Line Group and the tri-party opposition from within the Greater London Assembly. However, on 5th Feb they separately sought permission to work with Capco on the Earls Court development — a request which was granted, with reservations by some attending, including Sir Brendan Barber, who spoke against the move.

'Following TfL's agreement, Murad Qureshi AM said:

'TfL should not have rushed into this dubious joint venture under which it hands the majority of the value of Earl's Court over to private developer Capco. The Board should have deferred this decision until the London Assembly Transport Committee had a chance to properly scrutinise the JV, which it plans to do at its March meeting.'

An example is the Lillie Bridge Depot, which has been a key maintenance site for the London Underground since 1906, which will be severely impacted by the Earls Court Masterplan to the point of extinction. The Depot is a busy logistical centre, home to the LUL's MRIS Rail Engineering Works, Calibration Unit, Carpenters Works, Tube lines Transplant Depots and Storage Warehouses.

It has an established highly skilled workforce of 500 — it takes 4-5 years minimum to train each worker.



The site covering 17 acres, contains anything from nano-technology to giant lathes which are sunk deep into the ground would have to be re-located and to a place which is not at the hub of the tube network as it is currently — so far the only place to be mentioned is West Ruislip — which will impact on rapid response times, staff travel time and indeed staff retention. Train repairs are also undertaken there.

The RMT have voiced considerable concerns on the matter.

There is also a major construction issue related to the matter of the concrete apron over the rail network, which runs underneath the proposed building site.

The Earl's Court community see that the structural upheaval of the Lillie Bridge Depot will tear the heart out of the skilled workforce and local industry as well as put the safe running of the London Underground at risk if this facility is moved outside the capital as seems to be indicated.

As local Councillor Linda Wade says:

'...without the Estates and/or Lillie Bridge Engineering Depot, the Masterplan as proposed cannot be delivered, as passed by the two local authorities, therefore if these elements should not be included, the planning applications must revert to these local authorities as these elements are interdependent and cannot be executed without the other. This is the reason why the present scheme will not work without the Lillie Bridge Depot being re-located'

The transport arrangements for Olympia as an alternative exhibition space are insufficient and unreliable.

The proposed refurbishment of the original 30s underground passage from the Exhibition Centre to the mezzanine level of Earl's Court station will only provide increased access to the station and not increase the capacity of the station.

This station is already suffering from dangerous levels of overcrowding and will not be able to cope with the 7,600 new residents 'new' travellers to the development plus from the developments north of Cromwell Road. At a public meeting, broadcaster Evan Davis expressed his concern not only with respect to the inconvenience but also with regard to safety issues.

In 2008 21m exits/entrances and 19m interchanges — and the safety hazard pinch point at the head of the Piccadilly Line escalator has not been resolved. TfL have said that the Piccadilly Line improvements will be one of the last on the LUL system along with the Bakerloo Line, and even then that would offer just 2-3 additional trains per hour by 2028.

The safe and efficient operation of the Tube network is self evidently being undermined by this plan — which means the same situation could result elsewhere in the network and within other TfL functions, if TfL are allowed to enter into non-tendered, largely opaque dealings with private companies.

This brings with it the equivalent of privatising at least some of the service.

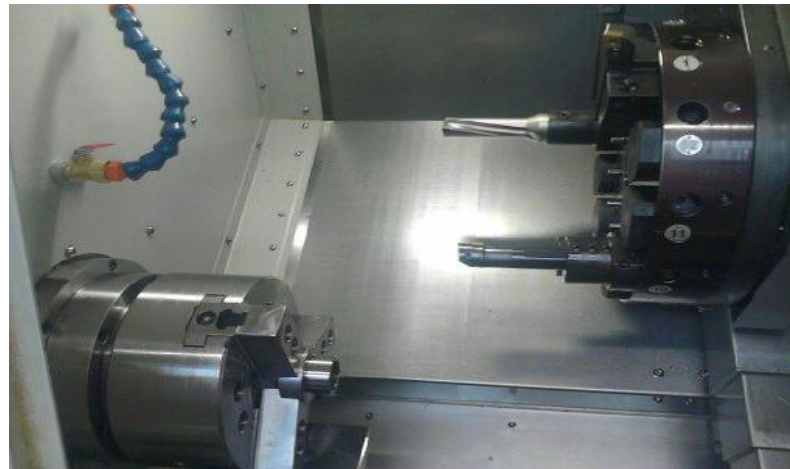
TfL Commissioner Sir Peter Hendy seriously downplayed the importance of the Lillie Bridge Depot site when he told the GLA Transport Committee 12th March 2014 that there was only ‘some carpentry’ on the site and rationalised the move by saying the site was ‘small’ and ‘not a holding bay for trains’.

Reference to the full details of the Lillie Bridge Depot functions, shows that this significantly underplays the situation.

If the RMT precision engineering works at Lillie Br. Depot is moved/dismantled it will impact negatively on passenger safety and delays. There is likely to be a significant loss of an important skills base.

With the future of the Lillie Road Depot as their own priority, the RMT have made their own feelings very clear on the matter —

‘The RMT unanimously supports the residents of Earl’s Court in their stand against destroying the iconic building in order to profiteer by selling luxury flats. The destruction of jobs, the forced removal of an engineering depot and the placing of private greed before public need is shameful and needs to be opposed. The RMT will continue support the campaign and offer the residents every assistance’



Andy Littlechild, RMT rep at Lillie Bridge Depot provides an assessment of the impact of dismantling the depot, which has been in place for more than 100 years:

A hub of track cleaners, the vent gang, ultrasonics team, lubrication team and the emergency rail change team, as well as calibration, heavy maintenance and renewals—many specialist and highly trained skills. Also stables District Line stock. Large complicated pieces of kit for crossings work, bridge repairs, specialist rails, timber, large precision equipment would all have to be relocated. Concrete bases 2m+ thick. Also 500+ staff accommodation. Moving these facilities to sites further afield/scattered will severely impact on efficiency and produce a health and safety risk to rail users because the teams will take longer to respond and complete tasks.

The proposals to build over the top of a proportion of the site and retain some services underneath does not bode well, given the problems with water ingress at Westfield where this has already been tried.

London Underground has been forced to divest due to lack of funds and are now running out of space—Acton is already ‘chokka’, leaving only Hainault and Ruislip.

The closure of EC2 will lose access and ingress for big lorries transporting equipment and parts—again no real solution offered.

After 2 years of consultation, London Underground could only say to the RMT that they have ‘got thoughts’ as to where the site might be re-located — which was re-iterated to the GLA Transport Committee in March ’14.

Now the RMT has reached agreement with London Underground, a subsidiary of TfL (but only after the threat of strike action), that access to Lillie Bridge Depot has been guaranteed for the full duration of the development and also there will be no sale or demolition of Lillie Bridge depot during Phase 1 of the redevelopment. London Underground has also committed to early talks with the RMT on Phase 2.

However, the RMT is concerned that under the private Transport for London bill currently in the Commons, proving TfL with the power to “form and invest in limited partnerships” of which its proposed joint venture with Capco is a prime example, may mean that responsibility is unclear and that London Underground may be able to negotiate less freely and meaningfully with the RMT because of any partnership in which TfL may become engaged.

There are abiding concerns about the risk of losing key trained staff and the impact of distance on rapid response. Outsourcing will also be more costly and less efficient.

In addition, speaking on behalf of the RMT Taxi Branch, their representative said that the plans will block transport arteries; they already have passengers complaining about how long it takes to get from Heathrow Airport to central London.

The drivers observe as they take passengers around the capital that there are so many buildings and luxury apartments standing empty 'the centre of London is being emptied and it is killing our city'

The Earls Court Exhibition Centres generates a 'huge amount of work' for cabbies — they report that if it goes they will suffer huge losses in a competitive market.

They additionally report that the plans for Olympia include no safe let down space for disabled passengers.



Referring back to the congestion caused by the Hammersmith flyover repairs, which added more than hour to get from Heathrow, they predict that this will occur again 'this 20 year development will kill everything off — it's just dreadful'

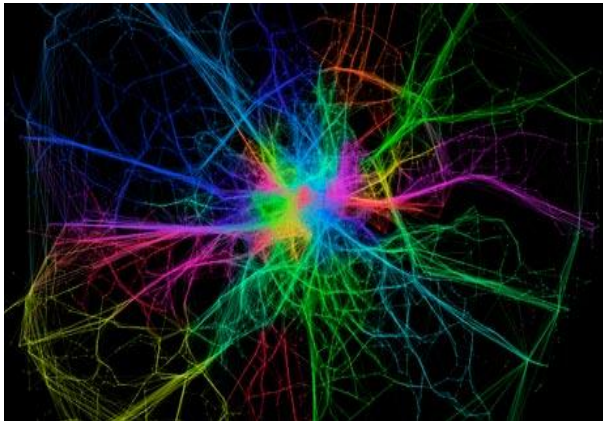
The evidence of poor communication between TfL operations and properties departments demonstrates that there seems to be more focus on profit than on responsible ownership.

The proposals for 4,330 car park spaces implies a huge increase in vehicles — the only response to this from the RBKC planning team is a flippant 'vehicles will be cleaner in 20 years time'. However the projected purchasers of the high rises implies a low residential take up of living spaces, coupled with the loss of the exhibition space, yet the parking allocation for these buy-to-leave properties will deprive other residents of parking space. In the 20 year 'interim', spaces will be taken by construction traffic.

Wider impacts :

impact on travel in the Earl's Court locality will impact on everyone -

- commuters
- Emergency Services
- school run
- shoppers/deliveries
- meetings schedules
- visitors to London from M4 etc
- football matches



impact on neighbouring boroughs

- transport back-up to Wandsworth & Battersea

impact on regional/national travel

- M4 tail backs / Heathrow

poor Tube contingencies:

- only one down escalator for 35,000 potential users mean Tube travellers will take a big hit - also impacting on tourism as well as business

Has the subsequent impact on Heathrow routes the potential to reduce London's world city status?

PUBLIC HEALTH & ENVIRONMENTAL IMPACTS

In section 9 of the Earls Court | West Kensington Opportunity Area (the OA) Joint Supplementary Planning Document — March 2012, there is an analysis of the need to consider a range of health impacts in relation to the planned works

9.12 An analysis of the health impacts of the proposed developments will need to factor — in the following sectors:

- Acute healthcare
- Mental healthcare
- Intermediate healthcare
- Primary healthcare

➤ **However, analysis of the implications of the emerged 'Masterplan' clearly demonstrates a range of serious public health implications over a very protracted period, which have not been addressed by either of the Councils or by Capco in a satisfactory way.**

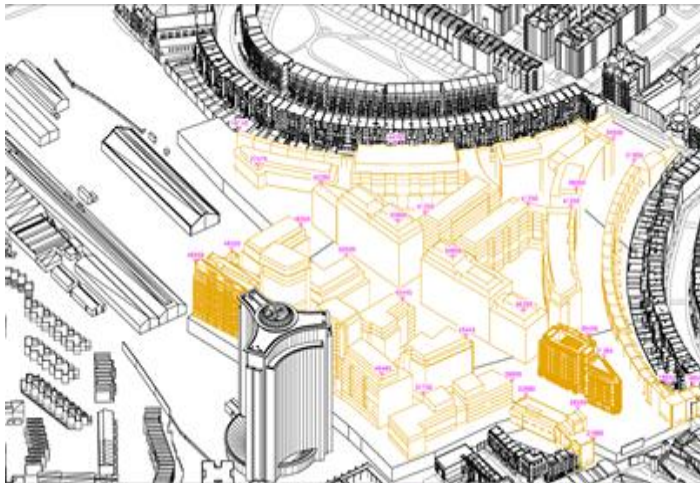
The local authorities are seen within the context of their own report as the means of safeguarding the environment. However, given the heavy handed way in which the concerns of local residents have been received hitherto, this does not fill them with any kind of reassurance with respect to the safe handling of materials, sufficient attention to land and air contamination or to the preservation of existing biodiversity.

Demolition, Excavation and Construction Impacts

12.3 Given the size and shape of the OA, together with the nature of existing buildings and railway infrastructure, demolition, excavation and construction are likely to be phased over a 20-year period. The impact of these activities, together with associated transport, on existing and new residents will have to be mitigated. The demolition of Earl's Court 1 is projected to be between 18 months and 2 years. These impacts might include:

- Construction traffic, including noise, vibration, emissions, loss of amenity, highway safety, congestion, parking and pedestrian safety;
- Light spill from night time working;
- Damage to neighbouring structures, especially heritage and archaeological assets;

- Ground movement;
- Disturbance of unexploded ordnance;
- Creation and exposure of contaminated land leading to pollution of land, air and water;
- Generation of waste;
- Dust and other emissions affecting air quality;
- Energy consumption;
- Noise and vibration
- Impacts on ecology



Flood Risk and Sustainable Water Management

12.34 Climate change, and in particular the possible increase in storms, has the potential to increase flood risk.

The impacts of climate change therefore need to be taken into account when considering the capacity of, and flows entering, the combined sewer network.

Redevelopment of the OA has the potential to generate many thousands of vehicle movements over a 20-year construction period, especially considering the volume of demolition and excavation waste and construction materials. These vehicle movements are likely to put pressure on the existing traffic network around the OA. Where remediation, recycling and re-use of materials on- are not feasible, materials should be transported using the most sustainable method. The West London Line Group has lobbied for the waste to be removed by rail.

Measures to control impacts from noise and vibration, air quality, land contamination, ecology and biodiversity and water conservation are also considered in the relevant sections of the section on an Environmental Strategy. Mitigating the impact of transport, including the movement of construction waste, is also considered in the Transport Strategy. However, given the aggressive and/or flippant manner with which the Council has responded to tenant and resident concerns, this does not bode well for future environmental management.



The list of regulations is clear with respect to the planned works — however the councils' report merely says 'many of the impacts from demolition, excavation and construction (including air quality, noise, vibration, dust, land contamination and asbestos) are controlled through other legislation, standards and guidance'. The lack of specific detail is glaring.

Ecology & Biodiversity

- 3.5 The redevelopment of the area will incorporate sensitively designed, publicly accessible, green, open spaces, including a number of garden squares. They will offer a range of opportunities for both formal and informal play and recreation as well as enhancing the ecological value of the area. All public open spaces, play spaces, streets and buildings will be inclusive and accessible.
- 4.34 At present, the land adjacent to the railway line carries significant biodiversity value. If it is decked over, this must be replaced and enhanced through an open space strategy.
- 4.50 Any proposal for a 'linear park' must include publicly accessible, green, open spaces that are wide enough to accommodate a range of functions, including full size games courts and sports pitches. It is therefore possible that if a proposal comes forward including a linear park, land take greater than 2ha will be required in order to ensure the park is fully functional

➤ **Reference to the plans now shows that these objectives have not been met.**



In addition to the health impacts related to unsafe travel, the mental health and other pressures already highlighted due to lack of access to social and affordable housing — including to NHS staff, and the loss of skilled long term jobs and small businesses which are and will result from these TfL plans, it is acknowledged that the UK and in particular the capital, have serious air quality issues, such that the EU is currently in the midst of prosecuting the UK government on the matter.

Air pollution levels across the capital are amongst the worst in Europe. The urgent need for the Mayor to take measures to ensure that the said air quality of the capital falls within the EU regulatory standards is made evident by the on-going penalties commensurate with that failure.

The current proposals for the Earls Court area are to take place in what is already specifically one of the most polluted areas of London — and thus in Europe, by dint of traffic congestion extant and other particulates, which along with increases in said congestion from construction traffic — indeed of up to 77–93 feet in length seeking access and egress through narrow residential streets, along with demolition particulates which also include asbestos, will serve only to increase the levels of PM10s, nitrogen dioxide etc. (which in SW5/6 is already 100x WHO acceptable levels) in that immediate area and beyond to increasingly dangerous levels which will put the health of the population — in particular children, pregnant mothers and those with pre-existing respiratory conditions at risk.

It is also to be noted that the WHO research shows that the lungs of children who exposed to excessive pollutants will not develop to their full potential, indicating potential problems into adulthood. N.B. ambient air pollutants in the causation of paediatric lung disease... including risks of air pollution to children is growing.

The proposed works to Earls Court will only increase the level of risk — especially to young residents and those with respiratory conditions — also given the sad lack of provision for green, open play areas in what will be an intensely over-developed area.

Warwick Road, a Red Route and a priority route for heavy vehicles is already regularly gridlocked and with difficult turning spaces. Construction traffic movement is tagged at every 6 minutes — and some are up to 93 feet long. This will back up traffic even more.

Air pollution causes 29,000 early deaths a year in the UK and the World Health Organisation has confirmed that air pollution causes cancer. Poor air quality also causes heart attacks and children living near busy roads in the UK have been shown to grow up with underdeveloped lungs. London has the highest levels of NO² of any European capital city and the UK has the highest proportion of zones breaching legal limits. In 2011 the WHO stated that public health experts agree that environmental risks constitute 25% of the burden of disease.

Increased use of diesel, which produces over 90 per cent of London's NO_2 , has exacerbated the situation. More than 4,000 individuals lose their lives prematurely in the Greater London area each year, directly due to poor air quality. 2011 was a particularly bad year when figures rose even more. This does not include figures for cancers which given the WHO evidence, will have resulted additionally — diesel also being found to have a major causative link.

9,000 people across London lost their lives prematurely due to bad air quality '11-'12



A high increase in PM_{10} s will result from demolition works and excess exhaust fumes from traffic back up in an area which already consistently fails the EU air quality target — including the nitrous oxide target by 100 times the limit.

It is also notable that the current Mayor has made every effort to disguise this fact, even going as far as trying to dampen down PM_{10} levels near monitoring stations with water and solvent sprays. Latterly, taking out key monitoring stations altogether, which does not make the danger any less. Recent offers of hanging baskets will not compensate!

Client Earth are taking Boris Johnson to Court in the EU re the government and the Mayor being negligent in tackling poor air quality in London which is second only to smoking for premature death causation.

There is also a significant risk of contributing to an exacerbation of climate change if this scheme goes ahead. Not simply from the build up of pollutants from traffic congestion, PM_{10} 's and nitrogen dioxide, but also from the creation of heat islands.

Policies 5.9 to 5.15 of the London Plan set out practicalities that seek to minimise overheating and contribute to heat island effects which minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water require the inclusion of sustainability measures within developments. However the over-development of the area over a protracted period will do exactly the opposite.

This Opportunity Area will be outside the defined area of the Mayor's Ultra Clean Emission zone, and it is acknowledged by Capco that Air Quality will be adversely impacted by the demolition/construction work, and yet the proposal to envelope the Exhibition Centre during the course of deconstruction to protect residents from air-laden debris has been rejected by the developers.

Londoners with respiratory conditions will much increased risk of an exacerbation of existing health conditions if a limited partnership with TfL, controlled by a non public body partner, is enabled by the inclusion of Clause 5 of the TfL Bill, along with other as yet publicly unknown plans for future developments.

Sir Malcolm Rifkind at the Adjournment Debate at Westminster Hall, January 21st 2014

'With regard to my constituents, the massive development is going to last for not one year or five years, because it will be up to 20 years before the work is complete, and that has substantial implications for those who live in the immediate vicinity. I want to make particular reference to the residents of Eardley crescent and Philbeach gardens, the two streets that are closest to the centre. The volume of traffic, the demolition and all the various works associated with any major development are bad enough, but something of this scale will be of great significance.'

Then citing the Council's

'willingness to have ongoing consultation with the residents of the adjoining streets, who will have to bear the brunt of the noise and dust, and various measures to ensure that much of the rubble that is removed will not be taken through residential areas...'

- which seems to be a poor return for representing residents' interests...

Given that the air quality routinely fails the legal requirement for PM¹⁰s and NO² content — and the definite exacerbation, which the works and transport hold-ups will cause, it is extraordinary that the developers choose to classify as 'minor adverse' — even though this is to continue over a period of 20years.

It is also known that the Earls Court 1 building contains significant amounts of asbestos within the fabric of its walls. When reassurance has been sought by people in the locality about its' safe removal there has been little information forthcoming neither from the Council nor from the developer. There is great concern that the management of the demolition will entail taking the top off the building first, which will allow free flow of offending particulates over a protracted period.

Such a direct result of hidden negotiations with parties for whom public health is of no concern in their prioritisation of large scale construction works which will increase polluting particulates, through large scale works in residential neighbourhoods and other areas, that there will be a significant public health risk must be addressed urgently.

Night time working will take place 10 metres from bedroom windows with no compensation payable, so householders and hoteliers will be left with nowhere to go. The Royal Borough of Kensington and Chelsea are offering no environmental mitigations even though some householders and hoteliers will have 90 nights of works close to their properties.

London Assembly members Stephen Knight and Darren Johnson have noted that however long the works take, their impact is classified as N/A in Planning Law — which has shocked everyone.



Both Mayor Boris Johnson – who is both Chair of GLA Scrutiny and Chair of TfL, and Secretary of State Eric Pickles have been petitioned, but rather than respond to concerns, they have actively circumnavigated or ignored due process and ploughed on regardless.

BACKDROP

The whole saga began with Stephen Greenhalgh, then Leader of HFBC openly saying he wanted Hammersmith & Fulham to be a borough only for the rich. Greenhalgh is now Deputy Mayor for Policing.

In response, the West Kensington and Gibbs Green Estates campaign has been professionally run over the past 4 years.

Several JRs and petitions have been raised — one petition was delivered on a bus tour, which visited TfL, Capco and Edelman, the PR firm.

Attempts to lock out the demonstrators backfired.

Other businesses in the locality have not been kept informed — lately Adel Rootstein, which is ideally placed for the West End and Sloane Square has tried to refuse the takeover of their premises, but have discovered that they don't actually own the freehold.

The councils have been challenged continually, yet all but a small number of objections have been rebutted or ignored.

The last judicial review to be heard in court was highly praised by the judge and all costs had to be borne by LBHF.

‘We are committed to the fight right through to the end and care not about the cost — it has gone too far. ‘

Jonathan Rosenberg

Meanwhile the developers are spending £1million per month in trying to carry through their intentions.

Requests have been made for an Independent Economic Impact Study and for a Public Enquiry. Other smaller plans with less impact in the capital have been afforded one or both of those measures, however the Earl's Court plans, with all of the complex implications have been ridden through roughshod.

Cross party members of the GLA have roundly condemned the plans that the lack of transparency with respect to TfL's dealings with developer Capital and Counties (Capco) is in line with the usual behaviours for these arrangements when entered into a limited company venture with a private developer.

It should be noted that operating as a public body alone, the expectation would be for TfL to exhibit more public accountability.

It should also be noted that the arrangement with Capco did not come about by a public tendering process to ensure best value or best practice.

This situation was borne out of self evidently socially engineered moves by Hammersmith & Fulham Council, originally instigated by Stephen Greenhalgh who said on record that he wants the borough to be for 'the rich'.

It should also be noted that during the Lords Bill Committee hearing that Lord Sewel, Chairman of Committees seriously reprimanded TfL for 'wasting years of Parliamentary time', the original Clause 4 requesting even wider powers for TfL having been removed following a series of objections from the rail pressure group West London Line Group.

It should be noted that many challenges to the Masterplan — their initial objective, have been made by local people and others such as the CEO of the Association of Events Organisers (an industry which generates several billions to the national economy per year), but most notably by the Labour, Lib Dem and Green groups jointly in the GLA.

The Mayor has notably chosen to fly in the face of the majority voice in the Assembly by pursuing this route.

This is metaphorically and literally a bulldozer scheme.



It should also be noted that SoS Eric Pickles made fundamental errors in his assessment of the 77-acre Earls Court Masterplan — the largest such development in Europe, for example stating that it does not impact on more than one local authority area, when it in fact impacts on both the Royal Borough of Kensington & Chelsea as well as Hammersmith & Fulham.

Said inefficient practices taking place behind an opaque wall and enabling social engineering and other bad practices will be allowed under Clause 5 and as such constitute a threat to the wellbeing of the population of London, to visitors to London, to pressure on the NHS, damage to tourism and overall damage to the London and also the national economies.

The question of land ownership

A total of 662 land properties and operational assets are currently admitted as being held by TfL — other data being extended to include all assets not as yet being available to the petitioner.

TfL own a significant amount of lands and assets, so the their bid to enter into innumerable opaque private sector arrangements is likely to result in large numbers of as yet unknown developments similar to that of the Earls Court Masterplan — if not, but potentially in terms of scale, but potential negative impact on local tenants and residents, commuters and visitors.

The private developer Capco has the majority 63% voice within circumstances, which are set to have a negative impact on the health of West Londoners over a period of 20 years or more.

TfL as a major landowner in the area — and indeed across London, now seeks to be granted powers to enter into countless and as yet opaque arrangements of potentially similar impact across the capital.

It is notable that this arrangement will allow large scale developments to ensue without any regard to the impact on local, regional or national economies. This includes a significant risk to local health economies, both in terms of public health, resulting demand for services and damage to the NHS workforce through lack of affordable homes.

If Clause 5 of the TfL Bill is enacted such that private developers will increasingly have the upper hand in the management of terrain and assets in London, the Earls Court Masterplan scenario will then be replicated elsewhere within the capital as a result of further such contracts entered into by said TfL.

Risk from Clause 5 Tfl Bill

There is no Appendix to Clause 5 providing a full and comprehensive list of TfL properties/land, which they wish to involve in the proposed partnerships. It is not possible to know whether the properties/land are currently being used to operate London Underground (e.g. as with Lillie Bridge Depot), London's buses, Docklands Light Railway, London Overground, Tramlink, London River Services or Victoria Coach Station and this lack of information denies residents, councils, the London Assembly, Parliament and others to subject TfL to further democratic scrutiny

Opaque profit driven arrangements are fraught with risk to the wider community — wherein there are no safeguards, nor public scrutiny.

A tendering process with local consultation along with an area impact assessment would be a standard approach for ensuring best value to the public purse and at least minimal public accountability on other related matters.

The conundrum takes another twist when it seems that any changes to the 'Masterplan' would entail a back-to-the-drawing-board situation because the two sites involved within the joint-borough plans are interdependent within the current proposals — and under planning law no plans approved by local authorities can be developed 'in part'.

The Lack of a Public Inquiry

Despite petitions and letters from the GLA opposition groups, the Secretary of State for Communities and Local Government has clearly not listened to national and local businesses; to MPs; to residents in both LBHF and RBKC; to the Musicians' Union and others who appreciate our cultural heritage. Neither has he listened to the 6,000 people who petitioned him; to the Association of Event Organisers who represent the Exhibition Industry as a whole; to the RMT and UNITE unions who represent the Lillie Bridge Depot workers and who have both come out in support of local businesses and residents; nor to the tenants of the West Kensington and Gibbs Green estates who face a very uncertain future.

Andy Slaughter, MP for Hammersmith (Labour):

‘West Ken and Earl’s Court residents didn’t expect Eric Pickles to do them any favours, developers always come before communities with this Government. But it has given us time to prepare a legal challenge to the planning consent which the Councils will now sign off. In fact, the slipshod way this decision has been made may give us another way of defeating the development. The Secretary of State says he will not to call in the planning application because it will not affect economic growth or housing needs, go wider than a single local authority or give rise to national controversy. It is a matter of fact that this scheme does all of this. It is the largest development under consideration in London, with an £8 billion value, almost no affordable housing and spanning two London boroughs.

I note that Smithfield, which is an iconic site, albeit much smaller than Earls Court, has been granted a public inquiry, as has the Shell Centre.

Not allowing a Public Inquiry may be unlawful as well as undemocratic.’



Councillor Linda Wade, Earl’s Court Ward (Lib Dem):

‘Despite the fact that campaigners had clearly outlined the negative impact on local residents, hoteliers, small business owners as well as on commuters and tourists, the Minister has dismissed all concerns. Moreover Eric Pickles’ decision not to call in the planning applications for the Earl’s Court and West Kensington Opportunity Area and to hold a transparent public inquiry, that would examine the impact of the development on a wider area. This decision was announced during the summer holidays, which is a classic method of releasing unpalatable news...’

The Response of the GLA

The matter has been debated at length in the London Assembly.

To directly quote from the lbhf.gov Earl's Court and West Kensington Joint Supplementary Planning Document ...

'Capital and Counties (Capco) own the freehold for Seagrave Road car park, are joint owner of the Empress State Building and have a lease on the Earl's Court Exhibition Centres. Transport for London (TfL), who own the freehold to the Lillie Bridge Depot and the land upon which the exhibition halls sit (subject to long leases to Capco), are actively collaborating with adjacent landowners to include their land within the wider redevelopment proposals, as are LBHF, who own the freehold for the West Kensington and Gibbs Green housing'

On 9 October 2013, by 14 votes to 7, with the support of all parties other than the Conservative party, this resolution was passed:

"This Assembly notes that the Mayor of London has approved the Earl's Court Opportunity Area plans, which will mean that...the Earls Court exhibition centres will be demolished in the absence of a full, independent economic impact assessment, and in the face of opposition from the event organisers industry".

The Assembly thus condemns the Mayor's role in demolition of Earls Court.

The resolution goes on to describe what happens to the West Kensington estate and the Lillie Bridge Depot, and it states that:

"TfL should not enter a joint venture to develop these sites".

That very clear instruction from the London Assembly was totally ignored by the Mayor. The same members of the Assembly subsequently wrote to TfL:

"We are writing to strongly urge you to defer your recommendation on entering the proposed joint venture with Capital and Counties...with regard to the redevelopment Earl's Court and West Kensington Opportunity Area".

The letter points out that the London Assembly transport committee had yet to discuss the matter. Members added :

“There has not...been a full independent economic impact assessment on what the loss of the Earls Court Exhibition Centres will mean to the local and national economy. There are also concerns that TfL will not receive the best value from this deal until the value of the land has been properly and independently assessed.”

GLA 9 October 2013

The London Assembly today condemned the Mayor’s decision to approve the redevelopment of Earl’s Court which it warned would mean the unnecessary demolition of the exhibition centres, the West Kensington and Gibbs Green housing estates and threaten 550 jobs at the Lille Bridge tube depot.

Assembly Members backed a motion^[1] describing the plan as a grave mistake and urging the Mayor, when deciding future planning applications on major regeneration projects, to ensure that he gives proper consideration to the full economic, social and environmental implications of the plan. It also called on Transport for London, a major landholder on site, not to enter a joint venture until there is resolution on these hugely important outstanding issues.

The motion also criticised the Secretary of State for Communities and Local Government for refusing to call in the application for a public inquiry.

Darren Johnson AM, who proposed the motion said:

“The Earls Court Exhibition Centre is an iconic shop front for London and UK business, worth an estimated £1bn to London’s economy and attracting one and a half million visitors a year. Yet it has been effectively condemned by the Mayor’s refusal to stop the redevelopment of the site for expensive flats and offices.

“In effect, the Mayor is overseeing a land grab on behalf of developers, turfing out the residents of the West Kensington and Gibbs Green housing estates in favour of foreign and home-grown super-rich. He must think again.”

Nicky Gavron AM, who seconded the motion and moved an amendment to it, said :

‘It’s not too late to save Earl’s Court. TfL has yet to enter a joint venture and I urge the Mayor as chair of TfL, not to do so until these key issues are resolved. It needs to deal with the legal uncertainties, get the best value for the land and secure affordable housing that ordinary Londoners can actually afford.

We’re not talking about some derelict and dilapidated site; Earls Court Opportunity Area has three going concerns. These plans will result in the closure of an exhibition centre worth £1bn to London’s economy, the West Kensington and Gibbs Green housing estates and the potential loss of 550 high skilled manufacturing jobs at the Lillie Bridge Depot.’

The full text of the motion agreed at the meeting reads as follows:

“This Assembly notes that the Mayor of London has approved the Earls Court Opportunity Area plans, which will mean that:

- the Earls Court exhibition centres will be demolished in the absence of a full, independent economic impact assessment, and in the face of opposition from the event organisers industry;
- the West Kensington and Gibbs Green housing estates will be unnecessarily demolished, denying the requests of the current residents to take over and manage their own estates, and new homes will be unaffordable to ordinary Londoners; and
- the Lille Bridge Depot will be demolished without a proper assessment of what the loss would mean to London transport and before a suitable replacement location has been identified, threatening 550 manufacturing jobs.



TfL should not enter a joint venture to develop these sites until:

- suitable alternative exhibition space has been established for Earls Court;
- relocation of the Lillie Bridge Depot is secured;
- TfL is certain it is getting best value for its land, which could be achieved through an open tendering or an agreement to retain an interest in the development;
- the developer agrees a review mechanism under which an increase in the site value would require a proportional increase in affordable housing provision; and
- there is certainty that all necessary land has been acquired by the developer and that legal action has been exhausted.

This Assembly therefore condemns the Mayor of London’s decision, and condemns the Secretary of State for Communities and Local Government for refusing to call in the application for a public inquiry.

This Assembly considers that these decisions are grave mistakes and calls on the Mayor of London, when deciding future planning applications on major regeneration projects, to ensure that he gives proper consideration and due weight to the full economic, social and environmental implications of the applicant’s plans.

On the Earl’s Court site in particular, he must ensure that TfL resolves the issues outline above before moving ahead.”

Steve Hedley, Assistant General Secretary of the RMT adds — 30,000 RMT members are fully behind the Save Earl’s Court Campaign. On hearing of the Secretary of State’s Eric Pickles’ decision to support the plans and refuse a public inquiry, he said:

“The RMT will continue to give its full support and assistance to the Save Earl’s Court campaign”.

Statement from Caroline Pidgeon made on behalf of the London Assembly Liberal Democrat Group

The decision taken by TfL's Board to enter into a joint venture with Capital and Counties Properties PLC to redevelop the Earls Court Exhibition Centres represents a huge blow for both the local economy and the wider events and exhibitions industry.

The shortage of exhibition space across London is well documented, with thousands of small business relying on Earls Court to provide an essential marketing platform for their products.

The decision to remove these landmark buildings also comes at a time when other world cities are expanding their exhibition capacity in order to provide a 'shop window' for national industries.

Sadly TfL's decision will create an even bigger shortfall in the space available for showcasing British business and risks undermining our international competitiveness.

The loss of existing jobs onsite together with the impact on local supply chains also leaves a big *question mark* over the intended benefits of this regeneration scheme.

It is a matter of deep regret that these economic impacts do not appear to have been given appropriate consideration by TfL's Board before making their decision.

On 23rd January, 2014, Transport for London's Finance and Policy Committee recommended that the board approve TfL entering a joint venture arrangement with Capital & Counties Properties and/or a wholly owned undertaking of Capco — with regard to the development of Earls Court One and Two, of which London Underground is the freeholder and Capco the long leaseholder, along with other properties owned by London Underground and Capco. Against all sound advice, TfL subsequently announced that they had entered into a Joint Venture with Capco.

NB. there are serious questions over whether that is the appropriate body and whether it has the powers to do this – likewise the manner of entering into key decisions in advance of a Feasibility Study commissioned for the specific reason of exploring risk being released.



Darren Johnson AM

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Minicom: 020 7983 4458
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Our ref: DJ4175

Your ref:

Date: 8 February 2013

Boris Johnson
Mayor of London
City Hall

Dear Boris

**Redevelopment plans for Earls Court Site – Earl's Court Exhibition Centre, Lillie Bridge Rail Depot and West Kensington and Gibbs Green Housing Estates
Kensington & Chelsea ref: PP/11/01937 & Hammersmith & Fulham ref: 2011/02001/OUT**

Earl's Court is a hugely important, successful and established international exhibition venue that brings in two and a half million visitors, thirty thousand exhibitors, hundreds of events and over a billion pounds a year to London. Benefiting from a central London location, close to the West End and convenient for Heathrow it attracts business from all over the globe and plays a key role in the growth of the expanding exhibition and events industry and our export economy. Its strong identity, distinctive townscape, a range of heritage assets and good transport links also draws in significant trade and revenue into the local area.

I strongly object to the redevelopment proposals granted planning permission by the London Borough of Hammersmith and Fulham and Royal Borough of Kensington and Chelsea and firmly believe that if the proposal goes ahead it will:

- Undermine the local and wider economy from the loss of the Earl's Court Exhibition centres, damaging both London's and the UK's world leading role in the exhibition and events industry.
- Result in the loss of a national institution which hosts top events, exhibitions and major concerts.
- Result in the loss of exhibition space and lead to London losing out to competitor nations as they subsidise, expand their event and exhibition space whilst London is already short of exhibition space for national and international events. Excel and Olympia are not a suitable alternative for most of the Earl's Court shows.
- Result in significant loss of jobs. From people employed at The Earl's Court Exhibition centres and the thousands of jobs it sustains; the Lillie Bridge Depot which employs upto 550 people; and the removal of the global mannequin manufacturer Rootstein, from its market.
- Result in the destruction of an iconic building which is part of our cultural and musical heritage.
- Lead to further deterioration of local air quality and breaches of legal limits.
- Result in the unnecessary demolition of the West Kensington and Gibbs Green Estate which consists of 760 homes, with disruption to the area for 20 years.
- Lead to overdevelopment and overwhelming of the transport infrastructure
- Provide an inadequate provision of affordable/social housing to meet existing and future demand.
- Result in a loss of privacy and overshadowing of adjoining properties;
- Result in an inadequate provision of green and open space and play areas.
- Result in loss of special needs school and inadequate secondary school provision.

Direct telephone: 020 7983 4411 Fax: 020 7983 4398 Email: darren.johnson@london.gov.uk
London Assembly website: www.london.gov.uk/assembly/members/johnsond.jsp

I fully support the ‘Save Earl’s Court Campaign’

The demolition plans are a recipe for a disaster, with massive economic, social and environmental consequences.

The winners are the developers, overseas property speculators, landlord investors, the rich and privileged and competitor nations whose Governments recognise the social and economic value of providing exhibition space and who will happily fill the void created by the loss of London’s premier exhibition space.

The losers are the events industry, the residents of the West Kensington and Gibbs Green Estate, employees of the Lille Bridge Depot and countless other businesses, and Londoners desperate for housing but shut out by the extortionate prices that bare no relation to what most normal people could ever afford in their lifetimes.

The loss of the Earl’s Court Exhibition centres is an act of cultural vandalism and will leave the hundreds of thousands of visitors bewildered at its loss.

At a time of austerity, I am astonished at how silent the Government has been in not protecting Earl’s Court and the jobs and income it generates.

The decision now lies with Boris Johnson, it’s on his watch. If he really cares about this iconic institution and also about London’s economy, he will turn this application down.

Best wishes

Darren Johnson

- **The role and actions of Hammersmith & Fulham and Kensington & Chelsea borough councils and the decisions made by Secretary State of Eric Pickles with Mayor Boris Johnson in his dual roles chairing both TfL and the GLA, taken in defiance of the majority view in the GLA, along with increasing community opposition should, we believe, be given particular attention.**

Planning Application

The Earl's Court Area Action Group made the following comments on the Planning Application Notification from RBKC relating to:

PP/13/07062 Redevelopment of the Earl's Court Exhibition Centre and the Lillie Road Bridge Depot

PP/13/07064 Land bound by and including 2-4 Lillie Road/348-350 Old Brompton Road / hardstanding and forecourt to the Earls Court Exhibition Centre/car park and associated accessed from Empress Place

Education/Health/Community/Culture/Leisure

The site of the current international, iconic destination location of the Earls Court Exhibition Centre will have a mere 324 square meters for education, health, community, culture and leisure in an overall site of 290,170 square metres. It is unspecified as to what this 324 square metres will be comprised of but it is just 0.1% of the first Phase of the Earl's Court development—about the size of a luxury penthouse.

Scale

The proposed buildings are too high, and the massing in scale is out of proportion with the surrounding areas.

Light

Light and sun-on-ground light levels range from "imperceptible" to "major adverse". In Earl's Court these very poor light levels will adversely affect many business and residential addresses in Eardley Crescent and Philbeach Gardens.

Character of the Area

The buildings are out of character with the surrounding area, out of proportion to most existing buildings and totally out of context. This failure to integrate with the surrounding area gives an inward looking “gated community” feel that we have tried to resist in Kensington and Chelsea.

Skyline

These buildings will infill the skyline, particularly impacting the heritage site of Brompton Cemetery irrevocably changing the context of this much-needed space within our densely populated neighbourhood.

Lillie Road Canal Bridge

From the illustrative material provided it would appear that the developers have included the Lillie Road Canal Bridge (dated 1821) and become a shared space for vehicles and pedestrians. This is not their land!

Transient Overshadowing

The proposed development will have "transient overshadowing".

Pre-existing site problems

There are pre-existing problems of water pressure, sewerage and drain-off with the site. Part of the site that the developers call Counters Creek already floods under heavy rainfall.

Enclosure

The proposed buildings are too close to existing properties causing "enclosure".

Loss of Privacy

Buildings, which have windows at the rear, will overlook existing properties.

Through this time, both the West Ken & Gibbs Green People's Estates and the Save Earls Court Campaign has achieved a list of actions :



Posters around locality



Public meetings

Stalls and leafleting



Eurogamers pledge support

Presentation of the Pickles Petition



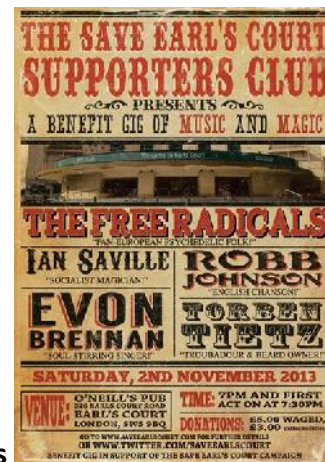
Boris Johnson postcards



I Love Earls Court Day



T shirts and badges, framed limited edition prints designed by Duggie Fields
– and celebrity support. (here with The Kinks' Ray Davies)



Fundraising gigs at O'Neills

and The Troubadour



Vandalism to tear down Earls Court

[illegible]

The assembly, planned to be inaugurated through by Kensington & Chelsea and Hammersmith & Fulham councils. The London Assembly, formerly known as residents representatives, Boris Johnson and Eric Pickles's roles in supporting the proposals. London deserves better. A far more modest spend on the soaring buildings would generate more jobs and income for the future, so it could continue to enrich both London's creative life and the national economy.

Forbes, Carol Anne; Ashton Group, Eagle
Fields, Nell Tennant, Bella Prand,
Molly Johnson, Oswald Boateng,
Zandra Rhodes CBE, Pam Hogg,
Andrew Logan, Tracy Hinton, Molly
Parkin, Barbara Hulanicki, Amanda
Wharfedale and 17 others

ORDINANCE Landowners won't reap the benefits of the Three County corporate land tax. The ordinance requires that the package amount to no less than 20 percent of the scheme's value. It will heavily help most based on the scheme's value. A large part of the new package is still in the public sector, and the promise of 10,000 new jobs is unrealistic without an independent economic impact assessment of the thousands of direct and indirect jobs created by the development. **BARRY LONGSON, GREENPARY**

SAVE EARL'S COURT

Internationally famous musicians, artists and more have come out in support of the Dave Earl's Court campaign in a letter printed in the Evening Standard on 25.11.2005. Here is the unaltered text.

Dear Editor,

The plural dimension of the scenic landscape Earth Grant Exhibition Centres is neither just cultural vandalism. The aesthetic, as Oscar Wilde might represent, the visual heart and hub of a community tied to the lifeblood of the London economy. The venue attracts on an international scale, with a diversity of millions of visitors and crowd-drawing events on the world map.

The last minute addition of a significantly smaller 'cultural' building offers scant compensation for the loss of the Exhibition Centres. Trade shows, product fairs, artists, musicians and performers find this venue a central focus because it offers an unrivalled space to connect London with the global arena of science, local traditions and to London as a whole in its inescapable.

Nothing about the so-called Maelstrom is beneficial for either the neighbouring community or for the long-term economy, only more shops, offices and apartments for the super-rich. These pseudo-planned developments, unlike—compared to—overseen investors and speculation, a mere 11% of which is 'affordable', look nothing like 'villages' London's skyline is already at risk according to UNESCO and put the shambolic plot of luxury property building continues. It is a scandal that will scar the capital forever and a bubble that will have to burst in the near future, inevitably.

This somewhat plain looking building through its roughness by the boroughs of Hammersmith & Fulham and Kensington & Chelsea, the London Assembly recently passed a motion endorsing Mayor Boris Johnson and Eric Pickles Secretary of State's roles in supporting these client proposals. London and its many visitors deserve far better. A far more modest spend on the buildings infrastructure would guarantee the Earl's Court heritage for the long term future, with a continuing enrichment both of London's creative life as well as the national economy.

Earth's Court Auction Group - supported by...

Ned Tennant • Bella Freud • Hannah Curtis • Holly Johnson • Ozark Beating
 Lady Mary Ross Henning • Jeremy Thomas • Zandra Rhodes CD • Bibby Beane
 Pam Hargreaves • Andrew Lages • Allan McKenna • Tracey Ullman • Jane Mulvagh
 Holly Partille • Barbara Hulanicki • Steve Thomas • Gay Henry • Duggie Fields
 Ben Langlands • Nikki Bell • Harrods North Deech CD • Brian Clarke
 James Birch • Richard Salmon • Amanda Elachi • Mark Stephens CBE
 Andrew Lang Oldham • John Boarder • The Reverend William Witzke

www.sarveearlsocourt.com



1. In these signs, the G20's London 2011 logo is joined to the London Underground roundel. 2. Prime Minister David Cameron. 3. A G20 leader. 4. A G20 leader. 5. A G20 leader. 6. A G20 leader. 7. A G20 leader. 8. A G20 leader. 9. A G20 leader. 10. A G20 leader.

[illegible]

Instruments of Parliament and Local Authorities



In response to strong arm tactics.....

Elected MP, Andy Slaughter, attempts to address the Council on behalf of residents and security guard pounces as the Council Leader declares he is not allowed to speak and the Cabinet Members walk out of the room



Press Conference, House of Commons

WESTMINSTER HALL DEBATE 21st January 2014

Andy Slaughter MP

'I am delighted to see the right hon. and learned Member for Kensington (Sir Malcolm Rifkind) in the Chamber. The better known part of the exhibition centre is in his constituency and I know that he has a strong interest in this matter. I am also delighted to see my hon. friend the Member for Bishop Auckland (Helen Goodman), the shadow Culture Minister here, which reminds us that this is not just a local or a London issue, but a national issue as well. I look forward to the Minister's response, because he is not only a great patron of the arts, but a local resident himself and no doubt a user of the exhibition centre. I hope that we will be joined by other hon. Members.

I acknowledge the people from the Earls Court Area Action Group, who are here in substantial numbers in the Public Gallery. They helped me prepare for this debate and, more importantly, they have been stalwart in the defence and promotion of the exhibition centre, since we +-learned that it was under threat. I thank them for their incredible efforts. I am wearing the badge today, but not the T-shirt. I hope that they will find this debate rewarding.'

...we are here to praise Earls Court, but we are also here because others wish to bury it. That includes Earls Court's current owners Capital & Counties, the London borough of Hammersmith and Fulham and Transport for London, which between them own the Earls Court opportunity area—one might call them partners in crime. They are abetted by the planning authorities, which conveniently are also the owners of those bodies in two out of three cases: the Mayor of London and the London borough of Hammersmith and Fulham. They are joined, I am afraid, by the royal borough of Kensington and Chelsea and the Secretary of State for Communities and Local Government in sounding the death knell for the exhibition centre by granting consent to the master plan for the development of the 80-acre site, which will lead not only to the demolition of the exhibition centre but the demolition of 760 high-quality, affordable homes on the West Kensington and Gibbs Green estates and the loss of 550 skilled jobs and a major manufacturing site for Transport for London at the Lillie Bridge depot. Each of those deserves a debate in its own right, and indeed I have previously raised them in the House. They are part of a much bigger plan to destroy Earls Court.'

THE ECONOMY

Lack of growth	Key area	Factor	Focal points
Local	Exhibitions, concerts, conventions	50% of Londoners attend – plus many more, including international audience	Loss of income generated locally per annum : £1.3 bn;
	Local trade	Direct - targeted	Hoteliers; bars; cafes - some local traders already going under.
		By product profits	Other shops and traders in the locality. 50% of Londoners visit ECCs pa.
	Employment	Earls Court Centres workforce	1,000 locally – source Earls Court Centre website
		Londonwide	12,500 - as above
		Local business	Lillie Bridge Depot – 500 highly skilled jobs Empress Building – currently Police HQ & LBDepot admin. Sale agreed. Clear Channel run a prime site signage just adjacent to St Cuthbert's Church Adel Rootstein mannequin factory with established international reach
	Job creation	20 year building works	H&FC & RBKC, the Mayor and Pickles all maintain that this will eventually create 12,000 jobs - however many of these are short term construction jobs, not long term infrastructure employment.
Regional	The Earls Court area has built its micro economy round the Ex Centres, but there is also Pan-London economic gain.	Exhib Trade	Enhances London economy : sales; visitors; footfall trade. Many exhibitors prefer EC due to lay-out and location.
		Hoteliers	A large number of local hoteliers from budget to high end have built their businesses around the EC. They will not find visitors attracted to staying next to a building site. No compensation.
		Cafes etc	As above – but this extends further because visitors will also spend time in other areas of London.
		Shops/tourism	As above.
		Offices	Planned but not needed and replacing existing thriving business
National	Other arenas	Olympia ExCel NEC	The UK exhibitions sector generated £11 billion in spending and contributed £5.6 billion in value added to the UK economy in 2010, equivalent to 0.4% of UK GDP. This activity supported 148,500 jobs in the UK equivalent to 0.5% of the total employment in the UK . £25bn minimum loss over 20 years. Companies already taking their exhibitions abroad instead.
			The future of these venues is also in doubt – or seen as unsuitable. Where will the UK Exhibitions Industry trade?

HOUSING

Social Engineering	Key area	Factor	Focal Points
Local	Social Rented	Gibbs Green & West Kensington Estates	760 properties to decent homes standard; accommodate families; gardens; long-term tenants and owner-occupiers. Established community. Caters for need. Family roots. (0% equivalent replacement)
	Affordable Intermediate	Not in first phase	Only 11% of homes planned fall into these 2 categories New classification of 'affordable' intermediate will only be accessible to household incomes of approx. £80k and above
	Luxury		79% of the newly planned homes will fall in the luxury category. These will largely be marketed to buyers from China, Russia, and Malaysia etc. who will either use them as 'buy-to-leave' for occasional use or rent them out to occupants who will be left vulnerable to high rents. This may also entail higher housing benefit costs to the councils who are busy knocking down social/affordable homes.
	Offices		Offices are to be built en bloc — however given the amount of office accommodation sitting vacant and already being transferred into living space in the capital, this is questionable planning — especially as it is a 15 year plan. What local non-construction employment in the meantime?
London-wide	<p>There is a recognised dire and increasing shortage of social rented and affordable homes in London. Fewer new family homes have been built during the Johnson 'watch'. The Mayor has overseen an overall collapse in house building – numbers have been falling and in 2012/2013 there were only 18,000 new homes completed instead of the 69,000 needed. Whole communities are being socially engineered out of central London by demolitions and high private sector rents, while travel costs are also increasing.</p> <p>This flies in the face of the London Plan, which requires 40% social/affordable housing from both H&FC and RBKC.</p>		

CULTURE

Heritage	Key area	Factor	Focal points
Local, national and international	Exhibition Halls	Concerts	As demonstrated in the letter submitted to Standard... Holly Johnson, Neil Tennant, have given iconic performances in the main venue.....
		Trade fairs	Ideal Home, London Book Fair,
		Olympic Games	1948 and 2012
	Industry	Adel Rootstein	Factory producing world renown fashion designer mannequins etc
	History	Molly Parkin et al	Memories of iconic concerts and of a vibrant and creative community at the heart of the UK and international music, arts and design scene.
Local	Restaurants, pubs, cafes, galleries	Grown organically around the EC Centres	A vibrant range to suit all tastes. Business was booming even through a recession until Capco deliberately began to reduce the number of events.
Replacement	At the last minute a small area of the site has been designated for cultural use		

TRANSPORT

Hub	Key area	Factor	Focal points
Tube network	Lillie Bridge Depot	Highly skilled Local industry Tube safety	Takes 5 years to train; established work force & excellent team spirit, which cannot be replicated. Unclear as to where the site/works will be re-located Currently in a central access point for fast response to repairs, which will impact on the proposal to introduce 24/7 train services Optimise on overnight maintenance Re-location puts safe and economic management of Tube at risk Challenges of clearing the site The cost to TfL, a public body, to relocate the depot
	Earl's Court Station	Safety and sufficiency Disabled access	Current plans to refurbish the underground passageway, will increase the capacity of access to the station without increasing the capacity of the station to cope with the increased traveller volume. This station is already to capacity No exit plans. Compromises local users – especially those with mobility/visual etc. challenges.
Road travel and congestion	Earl's Court One-Way-System/Cromwell, North End, Old Brompton and Lillie Roads	Already highly congested.	TfL acknowledges that Cromwell Road/A4 is to capacity Warwick Road is routinely gridlocked, and the increased construction traffic will effectively reduce this road from 3-lanes to 2-lanes. Permissions given for 70 foot construction lorries bearing heavy goods to have access to narrow residential streets cause a safety hazard and noise nuisance
National infrastructure	Heathrow access	Increased delays	This plan will impact on road access to and from Heathrow which has negative economic implications for the capital
	Arterial travel to W Country & Midlands	Clogging the national transport infrastructure	Access points to the M25, M3 and M4 to and from west and central London are likely to be seriously impacted.

ENVIRONMENT & POPULATION HEALTH

20-years & beyond	Key area	Factor	Focal Points
Construction works and traffic emissions	Building works	PM10s	Physical and mental health impacts: Respiratory disease Depression and exacerbation of existing conditions Risk of injury to children and cyclists More difficult to access A&E if needed London already misses the EU safety targets for air quality NOx is already 100 x safety levels
		Asbestos	
		Noise nuisance	
		Road safety	
	Traffic emissions	NO2 & nitrous oxide	
		Lead	
		CO	
	Climate change	Heat islands	creating exacerbating conditions via concentration of heat/pollutants

CONCLUSION

As we have read, the Earls Court Centre itself brings an income of at least £1.3 bn per annum to the London economy and several billions more nationally. The Exhibitions industry in other countries such as Germany is seen as a fundamental part of the economy — even seen as the cornerstone of post WW2 recovery and continuing to have government support. Conversely in England, the exhibitions space both inside and outside London is being downsized and thus downgraded.

With respect to the housing profile, there is now a pattern of evidence not obvious 2 years ago—we now have the emerging realisation and open discussion/writing about ‘the problem of luxury housing in London’— street after street with no lights on because these properties only serve as investment portfolios for the wealthy, rather than as residences. Simon Jenkins has latterly written in The Standard about this trend having already taken over a ‘Ghost Town’ area of Kensington.

The resulting socio economic downturn of deteriorating communities in the capital will also adversely both those who dwell and work in London as well as impact on the national economy — the increased traffic congestion also impacting on access to the capital, this also including key arterial routes to Heathrow.

Such a population downturn will also result in a sizeable shift in voter profiling and indeed the local democracy, with a ratio of approximately only 200 votes per 22-acres.

With respect to the lease and freehold arrangements on TfL land, there is only 28 more years on the Earls Court 1 lease until it reverts back to TfL. However this is different for EC2 and would mean that 80 years on, EC2 would be ‘landlocked’, marooned from the surrounding terrain due to lack of access. Indeed, Graham Craig of TfL agrees that this is an issue. This will impact on S106/CIL planning gain implementation and realisation in Hammersmith and Fulham.

RMT staff are still asking for solutions concerning the plans for the Lillie Bridge Depot. However so far, they have been told that there are only ‘ideas’

Many Earl’s Court area residents report stress symptoms and health ramifications such as heart conditions, at the prospect and reality of their homes and their neighbourhood being taken apart — this also includes the impact on long term local business owners whose incomes have been built up in a symbiotic relationship with the Exhibitions Industry. Small business traders in the impacted locality also report significant negative impact — with some already going to the wall — accompanied by great stress on the SME owners

Other observations:

- Pressure on tube network across London due to reduced maintenance facilities and insufficient adaptations to Earls Court tube
- During a meeting held at the House of Commons in June '13, Baroness Susan Kramer provided us with an alarm relating the Potters Bar rail tragedy to a skills breakup causing a runaway train to the potential dangers for London tube travellers.
- The Earl's Court Development Plan with £20million Capco investment is also accompanied by the possibility that the Olympia Car Park is being developed for housing, which brings fear that this events venue is also being viewed as expendable for a fast profit and long term loss.
- Many exhibitors see Earl's Court as having very specific advantages related to location and pricing. They call it 'the perfect venue' with no sense in closing it down. NB. Excel costs 50% more than EC, which undercuts trading profits.
- Hammersmith & Fulham Council is already the worst offender for luxury housing — with another 20,000 planned

For the developers to ignore this in favour of their own short term gain is a sign of the overall danger, which comes with allowing developers to have the upper hand in the management of land and facilities in London.

The Save Earl's Court campaign will fight on with the help of both the RMT and UNITE the Union, the Association of Event Organisers and the many people who support our campaign.

Colenzo Jarrett-Thorpe, UNITE's Regional Industrial Officer said

“UNITE the Union's commitment to the Save Earl's Court campaign continues. Solidarity! “

That is not to say that carefully managed and environmentally friendly construction is unwelcome, including sufficient social rented and affordable housing in suitable settings, rather it is the allowing of a public body, namely TfL to engage in un-scrutinised and unaccountable limited activities which are damaging to public health and wellbeing, resulting in an increased demand on health services and the NHS budget which will adversely affect the population as the increased pressures on services will squeeze access to treatment — a vicious circle.

We would also like to issue words of warning to Greater London. This Earl's Court scenario is likely to be replicated were TfL to enter into similar arrangements with Capco or other contractors across other areas of the capital wherein they seek to temporarily hand over majority control of land usage to a third party, for whom population wellbeing or health is not a priority nor even of any significant value.

Clause 5 of the TfL Bill will self evidently impact negatively on the capacity of many Londoners to remain resident in the capital, impacting on it's productivity, its culture, its local communities as well as on the health and wellbeing of individual households such as that of the petitioner due to the stresses and difficulties occasioned in seeking suitable and affordable housing. The resulting physical and mental health impacts will in turn impact on the cost of health provision, squeezing services in the capital, which will disadvantage those who have need — indeed are entitled to, good quality free at the point of need health provision for the on-going management of health conditions.

This is not just a geographically narrow view with respect to the Earl's Court locality but a necessarily wide view with respect to Greater London — and thereafter as a potentially negative impact on the national economy.

None of these issues mentioned are a hypothetical possibility, but a given if Clause 5 is not removed from the TfL Bill — or at the very least significantly amended.

As the largest development 'outside of Canada' (to quote Capco), it would be hoped that it should be designed and delivered in line with the London Plan. We have already asked the key question about where this sits with the housing aspect of the plan. Overall we can see that the summary of where this is clearly not met includes : quality and housing developments; neighbourhoods and communities; children and young people's play and informal recreation facilities; an inclusive environment; designing out crime; local character; location and design of tall and large buildings; public realm; heritage assets and archaeology; heritage-led regeneration; protecting local open space and addressing local deficiency.



With this in view we can offer a set of key risks :

1. Lack of care for the needs of the majority of the population in terms of housing, schools and healthcare provision
2. Loss of decent quality social housing with sufficient space, light, gardens and play space
3. Intense development of high rise buildings
4. Loss of light
5. Loss of and damage to community facilities – including transport and culture
6. Loss of heritage
7. Distress to the local economy – including small traders, hoteliers, sense of identity
8. Negative impact upon the London-wide and national economy
9. Noise, pollution, vibration, flood risk over a 20 year period
10. Distress to the local population
11. Public health hazard
12. Climate change impacts

It is clear, that for the sake of the people of Earl's Court and also of the wider economy of Greater London, the Earl's Court Masterplan cannot and must not be allowed to go ahead in its present form.

Andy Slaughter MP:

“This is a development, which is unprecedented over the last 40-50 years — we have to go back to slum clearance when a lot of mistakes were made but with good intentions — but this is simply about pure profit and greed, demolishing existing structures including homes. It has been delayed by several years because of the stout resistance from local people.

It's an absolute outrage that no public inquiry has been allowed, when other developments of similar scale or even a fraction of the size have been given permission to do so. There are 1,000 things wrong and very little which is right and I hope common sense will eventually prevail.”

Let us leave the final word with an Earl's Court local resident ...

'Having lived for 22 years in the Earl's Court, the proposed massive change to an area which has always offered a good quality of life, needs to be challenged. I see a whole community who have been gripped by a psychology of fear with the prospect of the displacement of residents and which has stopped planning and thinking had stopped planning and thinking about how to stop this looming disaster.

The public support for our campaign from the RMT Union, Unite the Union and London Assembly members has given us hope and so we are fighting back”.

Is this a done deal now? The answer is NO!



TOGETHER WE CAN SAVE EARLS COURT!

<http://www.saveearlscourt.com/>

APPENDIX

Earl's Court and West Kensington Opportunity Area (the OA) Joint Supplementary Planning Document — March 2012
London Borough of Hammersmith and Fulham | The Royal Borough of Kensington and Chelsea

1. INTRODUCTION
2. SITE CONTEXT
3. VISION AND OBJECTIVES
4. URBAN FORM STRATEGY
5. HOUSING STRATEGY
6. EMPLOYMENT STRATEGY
7. RETAIL STRATEGY
8. CULTURE STRATEGY
9. SOCIAL AND COMMUNITY FACILITIES
10. TRANSPORT AND ACCESSIBILITY STRATEGY
11. ENERGY STRATEGY
12. ENVIRONMENTAL STRATEGY
13. PHASING & SECTION 106 STRATEGY

http://www.lbhf.gov.uk/Images/Earl%27s%20Court%20and%20West%20Kensington%20Joint%20Supplementary%20Planning%20Document_tcm21-170130.pdf

http://www.myearlscourt.com/sites/default/files/earls_court_files/pdfs/LBHF/WBV-SustainabilityStatementLBHF.pdf



J Bell 2014