

Earl's Court and West Kensington Opportunity Area Joint Supplementary Planning Document

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# CONSULTATION RESPONSES SCHEDULE: EMPLOYMENT

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MARCH 2012



## Chapter 06: Employment Strategy

ID	First Name	Surname	Organisation Representing	Chapter comments relate to	Section comments relate to	Comment Made	Officer Response
88	Simon	Fisher		06	ES3	the Empress State Building should be retained in office use to anchor an enhanced employment core close to the West Brompton tube-rail interchange.	No change necessary. The authorities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF's Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.
148	Richard	Lane	Kensington and Chelsea College	06	ES6, Para 6.27	We welcome the prospect of increased employment opportunities arising from the redevelopment. However, to make this a reality for local people there clearly needs to be some building of training and employment support capacity - particularly to deal with potential redeployment of people employed in exhibition related businesses. ES6 recognises the need to respond to this threat to local businesses outside the OA - but working with local providers to achieve the objective is only mentioned as an afterthought in 6.27. This should be more prominent.	Change proposed. The ordering of paragraphs does not reflect the importance of particular issues. However, on the point about addressing the re-deployment of people affected by loss of exhibition space then this could be referred to under 6.26 as an added element "activity to support re-training of individuals affected by the closure of the exhibition centres".
149	Richard	Lane	Kensington and Chelsea College	06	ES6, ES7	We would also point out that ES6 which is about protecting businesses outside the OA needs to take into account existing local education and training providers which could be adversely affected if new, well resourced, capacity is created in the OA. This needs to be linked with ES7 which is about using local businesses.	No change necessary. the SPD does mention specifically direct partnership action with local provision 6.27 including colleges. An employment strategy and delivery plan would need to take this into account and the authorities will be seeking to introduce local provision and partners where appropriate.
150	Richard	Lane	Kensington and Chelsea College	06	ES8	ES8 should require developers to support existing local training providers where possible rather than set up their own training operations.	No change necessary. the SPD does mention specifically direct partnership action with local provision 6.27 including colleges. An employment strategy and delivery plan would need to take this into account and the authorities will be seeking to introduce local provision and partners where appropriate.
151	Richard	Lane	Kensington and Chelsea College	06	ES9	ES9 should include a requirement to provide capacity building funding for local providers of employability training.	No change necessary. Local colleges have contracts with the Skills Funding Agency that provides them with flexibility to respond to employer and learner needs. Therefore there is an argument that the college should be adjusting its provision and using its own existing funding routes to provide training for existing and new residents.
152	Richard	Lane	Kensington and Chelsea College	06		In addition we think there should be clear targets on the proportion of the workforce engaged in the development who are apprentices - including subcontractors as well as main contractors.	No change necessary. Target setting is dealt with within the Economic Development Teams' Employment and Training Code, referred to in para 6.23. It is not felt necessary to reiterate these targets in the SPD.
298	Sally	Groenedijk-Trigues		06		The proposed retail, office and hotel will undermine the viability of businesses in the Earl's Court area	No change necessary. The SPD is supported by an Office and Retail Studies which have considered the acceptable quantum of retail and leisure that could be accommodated within the Opportunity Area without having a negative impact on existing provision in the vicinity of the site. Key Principles ES2 and ES3 look to control the amount of business floorspace, whilst Key Principles RS1, RS2, RS3, RS4 and RS5 look to control the quantum, location and type of retail. The SPD acknowledges that an element of hotel provision would be expected to form part of any application for comprehensive development. The exact amount of hotel space would need to be predicated on evidence of demand for hotel space in the area and the authorities would need to be satisfied that such provision would not undermine the viability of other hotels in the vicinity of the Opportunity Area.
312	Sherry	Kernan		06		I would like to make the following comments on the Revised SPD in the hope that you will tighten the parameters with which the Earls Court project will be governed. Among the issues on which the developer needs to provide you more substance is the quality and quantity of job creation; it would be fewer than claimed and would be largely lower paid, unskilled positions, not compelling.	No change necessary. The SPD sets out an expectation that a minimum of 7,000 new jobs are created through any redevelopment of the Opportunity Area. The authorities would expect a range of skill levels within the range of jobs created. The authorities would certainly not wish to preclude the creation of lower paid unskilled positions which offer opportunities for people with few or no qualifications to gain access to employment. Key Principles ES8 and ES9 set out

							the mechanisms that the authorities will employ to try and get people to access employment and improve peoples chances to access employment through training initiatives.
386	Francois	Dumonteil-Lagreze		06		The proposed retail, office and hotel will undermine the viability of businesses in the Earl's Court area.	No change necessary. The SPD is supported by an Office and Retail Studies which have considered the acceptable quantum of retail and leisure that could be accommodated within the Opportunity Area without having a negative impact on existing provision in the vicinity of the site. Key Principles ES2 and ES3 look to control the amount of business floorspace, whilst Key Principles RS1, RS2, RS3, RS4 and RS5 look to control the quantum, location and type of retail. The SPD acknowledges that an element of hotel provision would be expected to form part of any application for comprehensive development. The exact amount of hotel space would need to be predicated on evidence of demand for hotel space in the area and the authorities would need to be satisfied that such provision would not undermine the viability of other hotels in the vicinity of the Opportunity Area.
395	Yvonne	Birch	Kensington and Chelsea TMO	06	Key Objective	<p>A working group of the board has considered the revised Supplementary Planning Document and how the development proposals may have an impact for residents of TMO managed properties who live very close to the edges of the OA. They raised the following concerns:</p> <p>06 Employment Strategy</p> <p>Although they agreed with the Key Objective of creating employment opportunities there were concerns about the number of local people who may lose employment through the closure of the Exhibition Centre. Although they noted that a minimum of 7000 jobs will be created there is a concern that these will not be the same type of jobs as those lost and also the short term impact of job loss before new opportunities arise.</p>	No change necessary. Key Principle ES6 requires developers to liaise with both borough's Economic Development Teams in order to include measures, during and post construction, to protect businesses outside the Opportunity Area affected by development. Key Principles ES8 and ES9 set in place mechanisms to improve people's access to training and employment.
508	Malcolm	Spalding	Earl's Court Society	06	Key Objective	Key objective CHANGE "minimum" to "maximum"	No change necessary. The authorities are committed to increasing employment opportunities through any redevelopment of the Opportunity Area and see the 7,000 jobs target as a minimum. To change this to a maximum would allow an applicant to provide little or no employment.
509	Malcolm	Spalding	Earl's Court Society	06	ES1	ES1 Does the quoted "existing business floorspace" to be renewed include the 60,000m2 of the Exhibition Halls?	No change necessary. This does not include the exhibition halls as they have been allocated for redevelopment in the Mayor's London Plan and both borough's Core Strategies. The Culture Strategy in the SPD sets out what the authorities will require in terms of retaining the Earl's Court 'brand' which has been created by the exhibition halls.
510	Malcolm	Spalding	Earl's Court Society	06	ES6	ES6 How will effects on existing local business be baselined and subsequently measured ?	No change necessary. The target setting would be based on discussions between any developer and the borough's Economic Development Teams. Such targets are too detailed for this SPD and would be dependent on particular strategies that the developer wished to deploy, in consultation with the Economic Development Teams.
569	Gennaro	Castaldo	Kensington Mansions Residents Association	06		I would like to put forward the following remarks regarding the Revised SPD, and trust that you will consider reviewing the parameters for the Earls Court project in order to make these much tighter. Among the areas where we believe the developer should provide greater insight include: the quality and extent of employment - which in our view is likely to be less than claimed and most likely lower paid, unskilled positions.	No change necessary. The authorities will expect any development to provide a wide variety of types of employment with a varying degree of skills expertise. The authorities are keen to see a large number of the jobs created through any redevelopment of the Opportunity Area to go to local people and as part of this, the authorities are also keen to put in place mechanisms that ensure that the skills set of residents are increased so as to allow people to have a greater choice when new job opportunities arise.
581	Michele	Gorgodian		06		- [bold] The effect on local businesses: shops, offices and hotels [end bold]	No change necessary. The SPD is supported by an Office and Retail Studies which have considered the acceptable quantum of retail and leisure that could

						I fear that the fragile mix of local shops and businesses we currently have, will deteriorate following the development.	be accommodated within the Opportunity Area without having a negative impact on existing provision in the vicinity of the site. Key Principles ES2 and ES3 look to control the amount of business floorspace, whilst Key Principles RS1, RS2, RS3, RS4 and RS5 look to control the quantum, location and type of retail. The SPD acknowledges that an element of hotel provision would be expected to form part of any application for comprehensive development. The exact amount of hotel space would need to be predicated on evidence of demand for hotel space in the area and the authorities would need to be satisfied that such provision would not undermine the viability of other hotels in the vicinity of the Opportunity Area.
661	Keith	Barker-Main		06		Demolishing EC1 & 2 will have a disastrous effect on the local economy which depends on the exhibition centres. It is not acceptable to promise long-term benefits when these will not be evident, if at all, until the late 2020s. The short term damage to the area's economy should not be dismissed.	No change necessary. Key Principle ES6 sets out that measures should be included as part of any planning applications to ensure that businesses outside of the OA affected by development are protected, both during and post construction. In addition, Key Principle CS1 requires any redevelopment that involves the loss of EC1 and/or EC2 to create a new strategic leisure, cultural and visitor destination. Para 8.9 sets out that this destination should be delivered in the earliest phases of development in order to minimise disruption to businesses around the OA that depend on the existing exhibition centres for trade.
854	Cllr Linda	Wade		06		There needs to be clarification as to how Empress State Building has been included in this JSPD. At present this building is primarily used by offices, so are the offices included in the office capacity of the site. If the upper levels of this building were converted to residential, would this be included in the residential units recommended by this JSPD?	No change necessary. The boundary of the Opportunity Area on the LBHF side is set within LBHF's Core Strategy and includes the Empress State building. Key Principle ES2 states that proposals should incorporate an additional 90.000sqm of business floorspace across the OA. This is a net figure and therefore, were the Empress State building to be changed to an alternative use, the lost floorspace would need to be reprovided elsewhere within the OA. the Metropolitan Police currently occupy the office building and as per the requirements of Key Principle ES1, any developer proposing change of use of the Empress State building would need to work with the Metropolitan Police in order to satisfactorily provide for their needs elsewhere within the OA.
903	Cllr Linda	Wade		06	Page 129	Employment  6.2 7,000 jobs (12,195 in Transport Capacity P. 129 JSPD): what is the profile of these anticipated jobs? Will they serve the local jobs market both in the construction phases and on completion, as these figures will have an impact on both the projected passenger and car trips to the site?	No change necessary. The SPD sets out mechanisms to ensure that local people have access to any jobs created within the OA. Key Principle ES8 sets out that any development will need to provide a recruitment and employability Construction Training Centre and a Recruitment and Job Shop in order to help local people access training so that they are equipped with the necessary skills, both during and post construction, for when any job opportunities arise. Key Principle TRN24 sets out that authorities expectation that car parking levels should be minimised in order to ensure that the majority of trips made into the OA for work are not by private vehicles.
904	Cllr Linda	Wade		06	Para 6.11	6.11 There have been significant difficulties in attracting take up of office space in West London, and therefore there should be a condition incorporated into the final JSPD/Planning Consent that these designated units are not made into residential units. Also, offices will attract employees from outside of the area, and therefore (6.26) a projection of figures for this employee group is needed to establish whether or not there will be an additional burden on the transport and traffic capacities.	No change necessary. Conditions will be put on any planning applications in order to ensure that business units cannot change to residential without the need for planning permission. These conditions do not need to be set out in the SPD. The authorities are unable to predict the exact split between those that are likely to be employed locally and those that will commute into the OA from further away. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.
905	Cllr Linda	Wade		06		The whole emphasis is on office, retail leisure and cultural building provision. No explicit mention of any space for making or repairing anything i.e. no workshop space. This undermines aspirations to increase apprenticeships as per the Key Objective of the employment section (P. 94), which is to "create a minimum of 7,000 new jobs and improving access to training initiatives an apprenticeships". Apart from an apprenticeship in window-dressing for shop windows what sort of apprenticeships are there in offices? CS3 on P. 113 refers to provision of artists' studio space, but these	No change necessary. As set out in para 6.2, business uses are defined as all those land uses within Class B1 of the Use Classes Order 2010, which covers light industrial uses which would incorporate workshop space. Key Principle CS3 does identify that the artists' studios should be affordable.

						would have to be at affordable rents.	
906	Cllr Linda Wade			06	Para 6.11	<p>Many of the businesses in the surrounding areas, both retail and leisure including hotels have been built over the years as a response to Exhibition visitor footfall. In the JSPD a further hotel is planned, which when combined with the planning application for an increase of rooms at the Hotel Ibis on Lillie Road is likely to undermine investment in the smaller hotels in the area. Due to the typologies of the hotels in the Earl's Court area, in town houses, there is the danger that with an existing pressure on the level of investment needed to upgrade, many of them with sui generis planning histories, which could mean that we land up not with conversion to residential use but an increase of hostels or temporary accommodation, one that the existing residential community would not favour.</p>	<p>No change necessary. Any hostel in sui generis use would need to apply for planning permission to change to an alternative use. Likewise, any hotel (which falls within Use Class C1) would need planning permission in order to change to a hostel (Sui Generis). It is envisaged that many of the hotels will still generate trade as a result of their enviable location on the Piccadilly Line between Heathrow and the West End. RBKC's Core Strategy Policy CF8 seeks to protect hotels, except in the Earl's Court ward. There would therefore not be any policy basis to protect hotels in the Earl's Court ward affected by the closure of the exhibition centres.</p>
1041	Mary Gardiner		Kensington and Chelsea Social Council	06	Key Objective	<p>Key Objective</p> <p>There need to be clear targets and milestones if the 7,000 jobs are to be achieved and to make a difference. Local jobs need to be defined and we propose that:-</p> <p>[bold] 50% of new jobs should be for local people living within a 15 minutes walk of the Opportunity Area boundary. The area of benefit should include Cromwell Road, South Stanley, Courtfield and Abingdon. [end bold]</p> <p>Within this catchment area, an area of deprivation could be identified for further positive action measures and a target of 20% should be set for the proportion of new jobs that will be taken up by the local black and ethnic minority communities.</p>	<p>No change necessary. It is beyond the realms of planning to insist that companies employ people that live locally. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of jobs for local people. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.</p>
1042	Mary Gardiner		Kensington and Chelsea Social Council	06	Key Objective	<p>Key Principle ES8</p> <p>There is significant unemployment, and a package of support is needed within this policy which is family friendly and includes:-</p> <p>[bold] - Training schemes to prepare young people for work</p> <p>- Language training. Skills audits will identify the numbers who are well qualified but cannot gain work commensurate with this because of the language barrier.</p> <p>- Affordable childcare and after school clubs that stay open later and enable people to work whilst their children are in a safe environment.</p> <p>- Targets for apprenticeships and targets for the construction</p>	<p>No change necessary. To list the specific training courses that the Construction Training Centre or Recruitment and Job Shop could provide would be too specific for this SPD. The purpose of Key Principle ES8 is to secure the provision of the facilities and funding for the facilities. Operation of these facilities is a consideration for the borough's Economic Development teams. The councils' joint Employment and Training Code does provide the level of detail requested and the borough's Economic Development teams would be happy to provide you with a copy of this.</p>

						training centre [end bold]	
						The many benefits of easy travel to work distance should be emphasised. For example, those with childcare commitments who need a local job.	
1073	Dahabo	Guled		06		Many residents in Earls Court are unemployed and most of the local business employment goes to outside strangers	No change necessary. the Key Objective of the Employment Strategy is to ensure that any development in the OA creates a substantial number of new jobs and that mechanisms are put in place to ensure that local people are equipped to access these new employment opportunities. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of jobs for local people. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.
1083	Dahabo	Guled		06		10. Employment and Training - Local residents employability should be considered - 50 % of the employment from the new development must to local people - On job training or to get job training needs to consider	No change necessary. It is beyond the realms of planning to insist that companies employ people that live locally. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of jobs for local people. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.
1115	Cllr J.	Gardner	RBKC Public Realm Scrutiny Committee	06	Para 6.10	- Paragraph 6.10: typo 'compromising'	Change proposed.
1145	Adrian	Bray		06		I would like much more information on the likely consequences of the demolition of Earls Court Exhibition centres in terms of number of local businesses dependent upon its in-coming trade? The very fact that Earls Court & Olympia have existed side by side for over 70 years is testament to the commercial sense of the exhibition industry. At a sweep this proposal will decrease the available floorspace for exhibitions in west London by two thirds. What studies have been carried out to ascertain the likely effects of this dramatic decrease? My suspicion is that the industry will lose critical mass and business will look elsewhere.	No change necessary. The exhibition centres are allocated for redevelopment in the Mayor's London Plan and the boroughs' Core Strategies. Key Principle ES6 requires developers to put in place mechanisms to protect businesses outside of the OA affected by development. There are plans to increase the capacity of Olympia so that it is able to cater for the more substantial events that were previously hosted at Earl's Court.
1146	Adrian	Bray		06		Not only will the local hotels, restaurants, shops, bars, clubs and cafes lose the exhibition trade, but they will then have to contend with the building of new hotels, restaurants, shops, bars, clubs and cafes within the OA. Which of the existing businesses will welcome that?	No change necessary. In addition to new facilities within the OA, development in the OA will also substantially increase the residential and worker populations. Key Principle ES6 requires developers to put in place mechanisms to protect businesses outside of the OA affected by development.
1192	Ilse	Molino		06		All the proposed new commercial premises will have a great negative impact on the established Earl's Court businesses, just when Earl's Court Road seemed to be improving, with fewer empty premises. These businesses have already a lot to put up with, constant heavy traffic and parking problems and other near shopping areas like Westfield in Shepherds Bush, Kensington High St. etc. being developed.	No change necessary. Key Principle ES6 requires developers to put in place mechanisms to protect businesses outside of the OA affected by development.
1230	Hilary	Mackay		06	Key Objectives	Key objective 6. Employment.  The mention of apprenticeships is to be welcomed. There is a thought that an apprenticeship facility in light engineering/mechanics could be linked with TFL's sheds and as a seed bed for business startups. This could also be appropriate for the local demographics	No change necessary. To list the specific training courses that the Construction Training Centre or Recruitment and Job Shop could provide would be too specific for this SPD. The purpose of Key Principle ES8 is to secure the provision of the facilities and funding for the facilities. Operation of these facilities is a consideration for the borough's Economic Development teams. The councils' joint Employment and Training Code does provide the level of detail

						and offer something a little more diverse than standard offices.	requested and the borough's Economic Development teams would be happy to provide you with a copy of this.
1246	Jenny	Montefiore		06		this SDP also places a focus on encouraging artistic endeavour and small business development which I applaud.	Noted.
						[italics] 6. Employment Strategy [end italics]	
1278	Brian	Coughlan	Met Police Authority & Met Police Services	06	Figure 6.1	Figure 6.1 Indicative diagram illustrating the potential distribution of businesses in the OA - notes the potential of the area which ESB is located in for smaller and mid sized, flexible units in mixed use buildings. The retention of ESB as an office use concurrent with adopted Core Strategy Policy LE1 should be within the final SPD in this regard: -  [italics] 'Centre of OA: Potential for smaller and mid sized, flexible units in mixed use buildings [bold] with the exception of ESB which will be retained in employment use'. [end bold] [end italics]	No change necessary. The SPD sets out a requirement in Key Principle ES1 that existing business floorspace in the OA should be renewed and modernised or replaced. The authorities are keen to see an additional 7,000 jobs created through redevelopment of the OA and that there should be 90,000sqm of net additional business floorspace (Key Principle ES2). The authorities do not wish to be prescriptive about what use the Empress State building should be put to but in order to satisfy Policy LE1 in LBHF's Core Strategy, any floorspace lost through a change of use of the Empress State building would need to be reprovided elsewhere in the Opportunity Area and as per the requirements of Key Principle ES1, any developer would need to have discussions with the Metropolitan Police in order to establish and provide for the requirements of existing tenants.
1302	Geraldine	Winkler	Mrs Fay Winkler	06		The business aspect of the development will have an overall prejudicial impact on existing businesses. Any increase in footfall will be negated by the increase in competition. Earl's Court currently enjoys small, local, individual businesses which add and indeed create the local character of the area. At the same time, businesses of the type who use the local community without competing with it, will be lost by the loss of the Earl's Court Exhibition Hall. It is proposed to out in offices, but are they needed? I understand that much of the office in the nearby Westfield is empty.	No change necessary. Key Principle ES6 requires developers to put in place mechanisms to protect businesses outside of the OA affected by development. The authorities consider that new business uses within the OA are unlikely to compete with existing business uses in the hinterland. The authorities are looking to control the quantum and location of retail such that any new retail does not impact negatively on existing centres.
1303	Geraldine	Winkler	Mrs Fay Winkler	06		I am concerned that the type of businesses that is to be attracted is not right for this residential area.	Noted.
1334	Linda	Wade	Nevern Square Conservation Residents' Association	06		The demolition of the Exhibition Centres will have an enormous impact on the local economy, and with the mix of office and retail it is not clear as to what the breakdown would be for local employment possibilities; the retail, restaurant and hotel trade that already exists will be detrimentally affected by this site.	No change necessary. It is beyond the realms of planning to insist that companies employ people that live locally. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of jobs for local people. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.  Key Principle ES6 requires developers to put in place mechanisms to protect businesses outside of the OA affected by development. The authorities consider that new business uses within the OA are unlikely to compete with existing business uses in the hinterland. The authorities are looking to control the quantum and location of retail such that any new retail does not impact negatively on existing centres.
1472	Michael	Bach	Kensington Society	06	Key Principle ES2	[bold] 6. Employment Strategy [end bold]  [bold] Key Principle ES2 [end bold] :The proposal to locate approximately 90,000 sqm gross office floorspace is [bold] overambitious [end bold] and would be in direct competition with Hammersmith Town Centre and Kensington High Street. Such a large amount of development would add considerably to the existing	No change necessary. The SPD is supported by an Office Study. This study has considered three scenarios for office space provision, the lowest of which was a net increase of 90,000sqm. The Office Study concludes that this quantum of floorspace would primarily serve local needs and would not impact negatively on the viability of existing business and office centres. The same study shows there to be demand for this quantum of floorspace.



						crowding on the underground line and at Earl's Court and West Kensington stations. In any case, we strongly doubt the market interest in such a large amount of office development outside town centres.	Key Principle TRN12 sets out that developers would need to provide capacity improvements at Earl's Court Station, whilst Key Principle TRN13 sets out that developers would need to provide capacity improvements at West Kensington and West Brompton stations.
1473	Michael	Bach	Kensington Society	06	Key Principle ES3	[bold] Key Principle ES3 [end bold] The Society agrees that any growth should be phased, both to avoid undermining the Core Strategies but also to test the market for such a large injection of floorspace in a non town centre location.	Noted.
1516	Richard	Chute		06		Similarly, the supporting argument that local employment would be created by the demolition of their estates - presumably as bricklayers - is ludicrous. This is like saying that "by breaking your leg, you can train & become a doctor"!	No change necessary. No argument is made in the SPD that local employment would be created by demolishing the estates.
1532	Richard	Chute		06		It is sad that the well-being of future residents has been neglected, by the absence of dedicated workrooms within residential living spaces for home employment. Employment opportunities in light industry are actually what this neighbourhood really needs.	No change necessary. Live-work units have a chequered history. This SPD does not make specific reference to the need for any live-work units, yet does not preclude them. Any application proposing live-work units would be assessed on its own merits. Para 6.2 of the SPD clarifies that 'business uses' includes light industrial uses (Use Class B1(c)). The authorities would welcome the provision of light industrial units, where it can be demonstrated that their impact on residential amenity would be negligible.
1914	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	06		42. [bold] Jobs and Employment Strategy. [end bold] The quantum of jobs being proposed is totally unclear. As far as we can see, there is no statement in any of the documentation as to the number of jobs currently in the OA. We have asked for this information before and it is still not available. There is no clarity and no clear relationship between the assumed employment floor space, the land use mix and the number of retained and proposed new jobs. We ask for it to be included in a revised SPD/AAP, as without this information one cannot make sense of the proposals - do they represent an increase of jobs, or not? We assume that they do, but have no idea if this is actually the case and, if so, how large any increase may be. This is of course critical to the calculation of impacts on the transport network because it points to the pattern, the origin and the destination as well as the number of journeys by all modes from, to and through the OA.	No change proposed. The key objective in the Employment Strategy states that there should be a minimum of 7,000 new jobs created through and redevelopment of the OA. These jobs would have to be additional to those currently provided in the OA. for example, if there were currently 2,000 people working within the OA then development proposals would have to provide for a minimum of 9,000 jobs. It would be up to any applicant to assess the number of jobs currently within the OA at the time of any planning application. The authorities are of the opinion that it would be misleading to include a current jobs total within the SPD as this figure might increase between the adoption of the SPD and the submission of any planning applications.  Key Principle ES1 requires any developer to establish the needs of existing business tenants in the OA and demonstrate that these businesses needs are catered for in any development proposals.  Any applicant would need to clearly set out how much business floorspace they are proposing and how many jobs they envisage this floorspace would create. It should be noted that jobs will also be created within other land uses such as leisure and retail and information on the numbers of jobs within these other sectors would also be required from the applicant.
1915	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	06		43. Para 6.1 says that there is a minimum target of 7,000 new jobs and that jobs in the business sector will make "the greatest contribution" to this total (we assume this to be between say 3,500 to 4,500?). Para 6.2 suggests that the other jobs will come in the culture and retail sectors. ES2 goes on to say that there should be additional business floorspace of approx 90,000sqm across the OA, presumably to house the 3,500 to 4,500 business sector jobs. However ES2 says that this is "primarily to meet local demand in both boroughs", although Para 6.10 says it will meet "some of the sub-regional shortfall". Not only does this further confuse the picture as to what is really being required, it sits uneasily with the statements in the Transport Chapter about people living and working in the same area and the stated primary objective of creating a 'world class' development. Further clarification is needed	No change proposed. The business floorspace will be expected to primarily serve local need. However, it is acknowledged that there may be the potential for some business space to accommodate a more strategic need, especially along the A4 (see figure 6.1 and para 6.14). the key aim of the Employment Strategy is to create jobs for local people. There will undoubtedly be jobs that fulfil a more strategic role and it is beyond the realms of planning to control who has access to jobs created by the development. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of this. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.

						in the revised draft.	
1916	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	06		44. Paragraph 3.9 contains a sweeping assertion that economic benefits, including new jobs, will accrue locally. This smacks of a discredited London Docklands 'trickle down' theory. Mechanisms need to be put in place, funded by the development, to ensure economic uplift in the surrounding areas. We welcome the measures set out in the SPD but, as noted above, these are insufficient, with few safeguards and are unlikely to succeed in directing the benefits of the development towards the local community and businesses. The SPD specifically limits social provision to that needed to support the development, conflicting with the statement here that the needs of the surrounding community will be met.	No change proposed. The authorities consider that the key principles contained within the Employment Strategy ensure the delivery of jobs to local people. Key Principles ES4 and ES5 aim to ensure that there is space for small and medium sized businesses and incubator units, which are more likely to employ local people. Key Principles ES6 to ES9 aim to ensure that there are financial contributions in place to implement projects aimed at getting local people access to employment both during and after construction.
1917	Jonathan	Rosenberg	WK/GG Community Homes, WK TRA, GG/Dieppe Close TRA	06		45. We welcome the proposals to secure the provision of affordable business space, local procurement, recruitment and training, a Job Shop and a local labour delivery plan.	Noted.
2066	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	06	ES3	The draft text should be amended to remove the reference to 'up to half' of the overall quantum of business floor space being delivered in the early phases of redevelopment. A proportion would be appropriate but subject always to feasibility. As currently worded the revised draft SPD is too restrictive. Provision of smaller/medium sized enterprises is supported but similarly must be subject to feasibility.	No change necessary. The SPD is supported by an office study, which sets out the appropriate quantum of office space that can be delivered at different phases of development. The authorities feel strongly that no more than half of the business floorspace should be delivered in the early phases of development in order that the strategic office locations at Hammersmith and White City are not undermined by the delivery of business space in the OA, too early in the development phases.
2067	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	06	Para 6.12 - 6.14	It is inappropriate for the revised draft SPD to be specific about the location and timing of delivery of business floorspace.	No change necessary. The SPD is supported by an office study, which sets out the appropriate quantum of office space that can be delivered at different phases of development. The authorities feel strongly that no more than half of the business floorspace should be delivered in the early phases of development in order that the strategic office locations at Hammersmith and White City are not undermined by the delivery of business space in the OA, too early in the development phases. It is the purpose of SPDs to provide supplementary detail to policies in Development Plan Documents. The Mayor's London Plan and the boroughs' Core Strategies identify the OA as being appropriate for business floorspace but no clarity is given on exactly where in the OA this floorspace would be appropriate. The SPD supplements these policies by identifying where in the OA the authorities consider that the provision of business floorspace would be appropriate.
2068	Matthew	Gibbs	CapCo/Earl's Court and Olympia Group	06	Para 6.16	Reference to the securing of affordable business space is acknowledged but, again must be subject to feasibility/viability considerations.	No change necessary. This is true with many of the asks in the SPD that would be secured through any Section 106 agreement. The position in the SPD is that the authorities will secure the provision of affordable business space. Were this not to be possible because of viability considerations, it would need to be justified within any planning committee report. Viability would be a legitimate consideration for not securing affordable business space; however, the authorities feel that every Section 106 ask should not need to be caveated with viability considerations.