

**WRITTEN STATEMENT**  
**OF**  
**CAPITAL & COUNTIES**  
**ON BEHALF OF**  
**EARLS COURT & OLYMPIA GROUP**

---

**Introduction**

1. This Written Statement is submitted by Capital & Counties (C&C) on behalf of Earls Court & Olympia Group (EC&O Group) with regard to the Earls Court Strategic Site which forms part of the Earls Court Regeneration Area and Earls Court and West Kensington Opportunity Area. It follows representations submitted at the following stages of the Core Strategy:
  - i) Core Strategy Issues and Options – representations submitted in April 2008
  - ii) Core Strategy “Towards Preferred Options” – representations submitted in October 2008
  - iii) Places and Strategic Sites – representations submitted in June 2009
  - iv) Draft Core Strategy – representations submitted in September 2009
  - v) Proposed Submission Core Strategy – representations submitted in December 2009
  
2. As explained in the representations, the Earls Court Regeneration Area is a significant brownfield development opportunity located in the London Borough of Hammersmith & Fulham (LBHF) and the Royal Borough of Kensington & Chelsea (RBKC). The Earls Court Regeneration Area comprises the Earls Court Exhibition Centre which is owned by EC&O Group, the Lillie Road Depot owned by Transport for London (TfL), and the West Kensington and Gibbs Green housing estates owned by LBHF. The combined holdings total 28 hectares and constitute the majority of the Earls Court & West Kensington Opportunity Area which has been newly designated in the Draft Replacement London Plan (DRLP). The portion of the Earls Court Regeneration Area within RBKC (7 hectares) comprises the Earls Court Strategic Site identified in the Submission Core Strategy. This Written Statement relates to the Earls Court Strategic Site and should be considered in the context of the wider Earls Court Regeneration Area and Opportunity Area.
  
3. This Written Statement addresses Matter 11 – Infrastructure / Monitoring, Risks and Contingencies / Proposals Map and is consistent with representations previously submitted by C&C. RBKC has incorporated some changes in response to C&C’s reps as the Core Strategy has evolved. However the document as it stands requires further amendment in respect of “Infrastructure / Monitoring, Risks and Contingencies / Proposals Map” to ensure it is sound and, in particular, to ensure it provides an effective basis for development proposals to come forward at the Earls Court Strategic Site.

4. The representations promote the large scale development potential of the Earls Court Regeneration Area and the Earls Court and West Kensington Opportunity Area. They are supported by a suite of evidence base documents which analyse the potential for the Earls Court Regeneration Area and the Earls Court and West Kensington Opportunity Area in relation to different topic areas.
5. C&C would like to draw to the Inspector's attention their previous representations on the Proposed Submission Core Strategy. Where appropriate the proposed text changes have been revised to reflect C&C's up to date position. These are set out below.

### Infrastructure

6. Changes are required to the infrastructure expectations for the Earls Court one-way system. The changes sought by C&C are as follows:

**Where column** – Earls Court one-way system

**What column** – *Secure highway contributions including the investigation and implementation of measures to return ~~Investigating and contributing to returning~~ the Earls Court one-way to two-way working and improve the pedestrian environment subject to feasibility and necessary approvals.*<sup>1</sup>

7. The revised text provides flexibility for a deliverable solution to come forward without undermining the overall objective.

### Monitoring – 38.5.7 Earls Court

8. Consequential changes are required to the policy targets and outputs to reflect the strategic site allocation, including C&C's proposed changes to the Earls Court Places and Strategic Site chapters (10 and 26) and to reflect the Opportunity Area designation in the Replacement London Plan.
9. The changes sought by C&C are as follows:

**CA7(b)** **Target column** – Provide *a minimum* of 10,000 sqm (108,000 sqft) of *office floor space non-residential floorspace including office and/or other uses required to deliver a sustainable and balanced mixed-use development, such as hotel, leisure and social and community uses some of which may be provided within LBHF as part of the masterplanning process for the Earls Court & West Kensington Opportunity Area, but must benefit development in the Royal Borough.*

**Monitoring column** – The amount of floorspace proposed as part of the planning application for the redevelopment of the site *to deliver a sustainable and balanced mixed use development.*

---

<sup>1</sup> To avoid confusion with the notation used for the RBKC recommended changes to the Submission Core Strategy the text changes sought by C&C are shown in bold italics underlined.

- CA7 (c) **Target column** – Provide small-scale retail and associated uses (within the A Classes of the Use Classes Order 1987 (as amended)) to serve day-to-day needs of the new development, the extent to which uses form part of a new centre for the Earls Court & West Kensington Opportunity Area to be informed by the masterplanning process.
- CA7(d) **Monitoring column** – The new use of the Exhibition Centre, of at least national significance, proposed as part of a planning application for the redevelopment of the site Earls Court & West Kensington Opportunity Area.
- CA7(e) This part of the policy should be deleted as it is covered by the proposed CA7(b).
- CA7(f)(m) **Target column** – Secure highway contributions including the investigation and implementation of measures to facilitate the return unravelling of the Earl's Court one way system to two way working; and improve the pedestrian environment subject to feasibility and necessary approvals.
- Monitoring column** – The return unravelling of the one-way system to two-way working subject to feasibility and necessary approvals and highways improvements proposed as part of planning application for the redevelopment of the site.

#### Contingencies and Risks – No.7 Earls Court

10. The following changes are sought by C&C to properly reflect the development proposals for the Earls Court Regeneration Area and to ensure deliverability in accordance with PPS12:

**Policy** – Earls Court Exhibition Centre: mixed use redevelopment including an exhibition or convention use cultural and destination use.

**Dependency:** if this policy is not implemented, what may not happen on the ground as a result? – The Earls Court cultural exhibition 'brand' is lost if no exhibition centre or convention centre use is included in the redevelopment. Redevelopment and regeneration in line with London Plan Opportunity Area designation and policies and Core Strategy Places and Allocations objectives for Earl's Court is not achieved.

**Risk(s):** what can get in the way of implementing the policy? – The cultural and destination exhibition or convention uses require too high a cross subsidy from the development forcing up development volumes to unacceptable levels.

**Likelihood of risk occurring?** (Low, Med, High) – Negligible-TBC depending on viability studies.

**Impact on the strategy if risk occurs?** (Low, Med, High) – High-Medium

**Potential Alternatives** – Whilst it is the ambition of the Council to retain the possibility an international convention or exhibition centre in Earls Court. However,

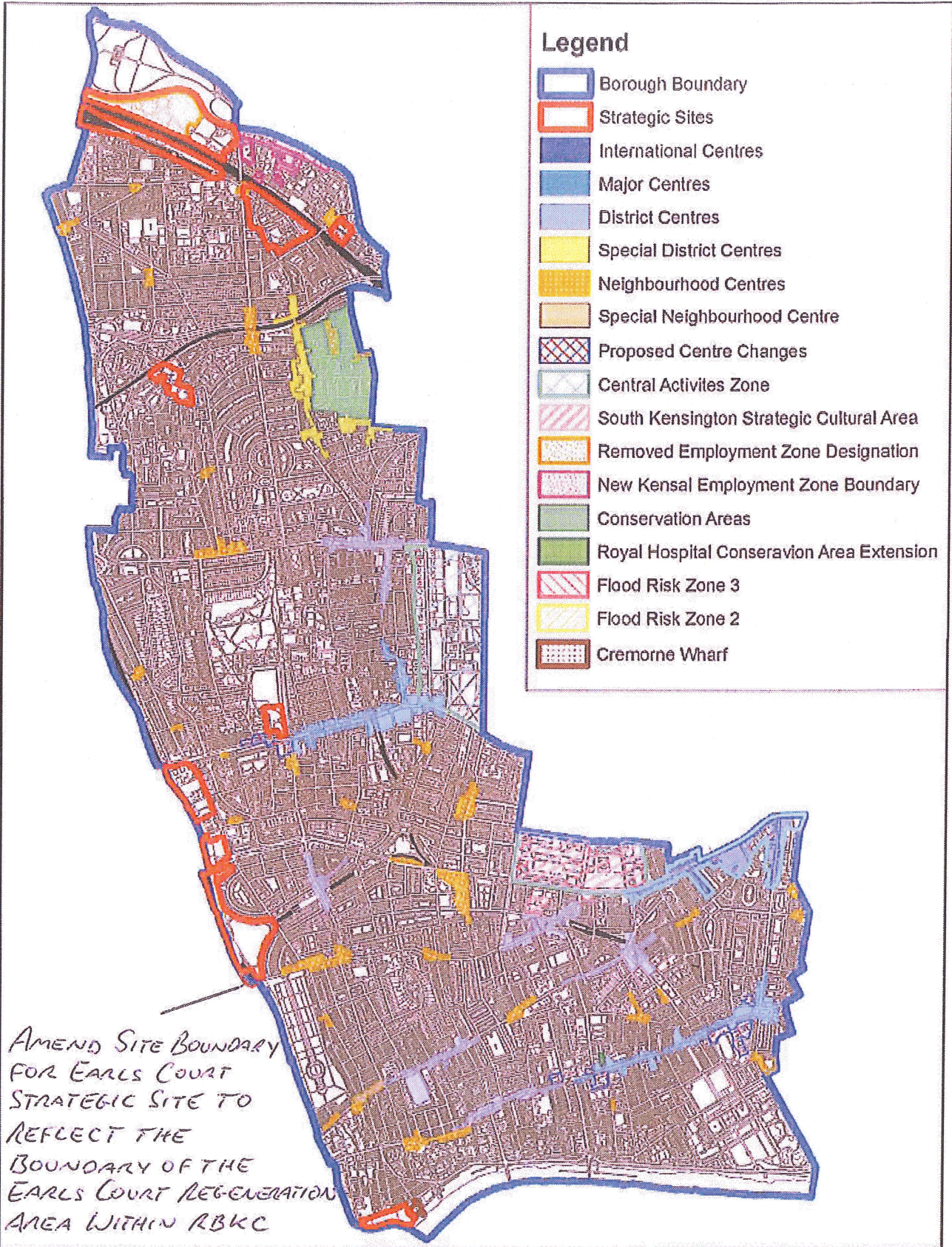
~~these facilities may be provided within the Kensington Olympia site and therefore a cultural facility of at least national significance would address the Council's ambition to retain the cultural brand. centre may prove more difficult to achieve, it is clear that the current Earls Court owners have every intention of building on the Earls Court brand. A scheme not involving as many cultural or destination uses could be implemented if that was the only way of achieving regeneration. However, it is clear that the current Earls Court owners have every intention of building on the Earls Court brand. Therefore no Plan B developed is needed despite the high- medium impact score.~~

11. C&C propose that the column dealing with dependency entitled: "Earls Court one-way system does not receive sufficient investment to be returned to two-way working or sufficient support from TfL and thus remains in place" is deleted.
12. This is because the C&C proposed change to the policy allows for appropriate flexibility in relation to the Earls Court one-way system which makes this issue superfluous. In reality what can feasibly and viably be done to improve the one-way system should be done and therefore if it is not feasible or viable, there is not realistically a "Plan B".

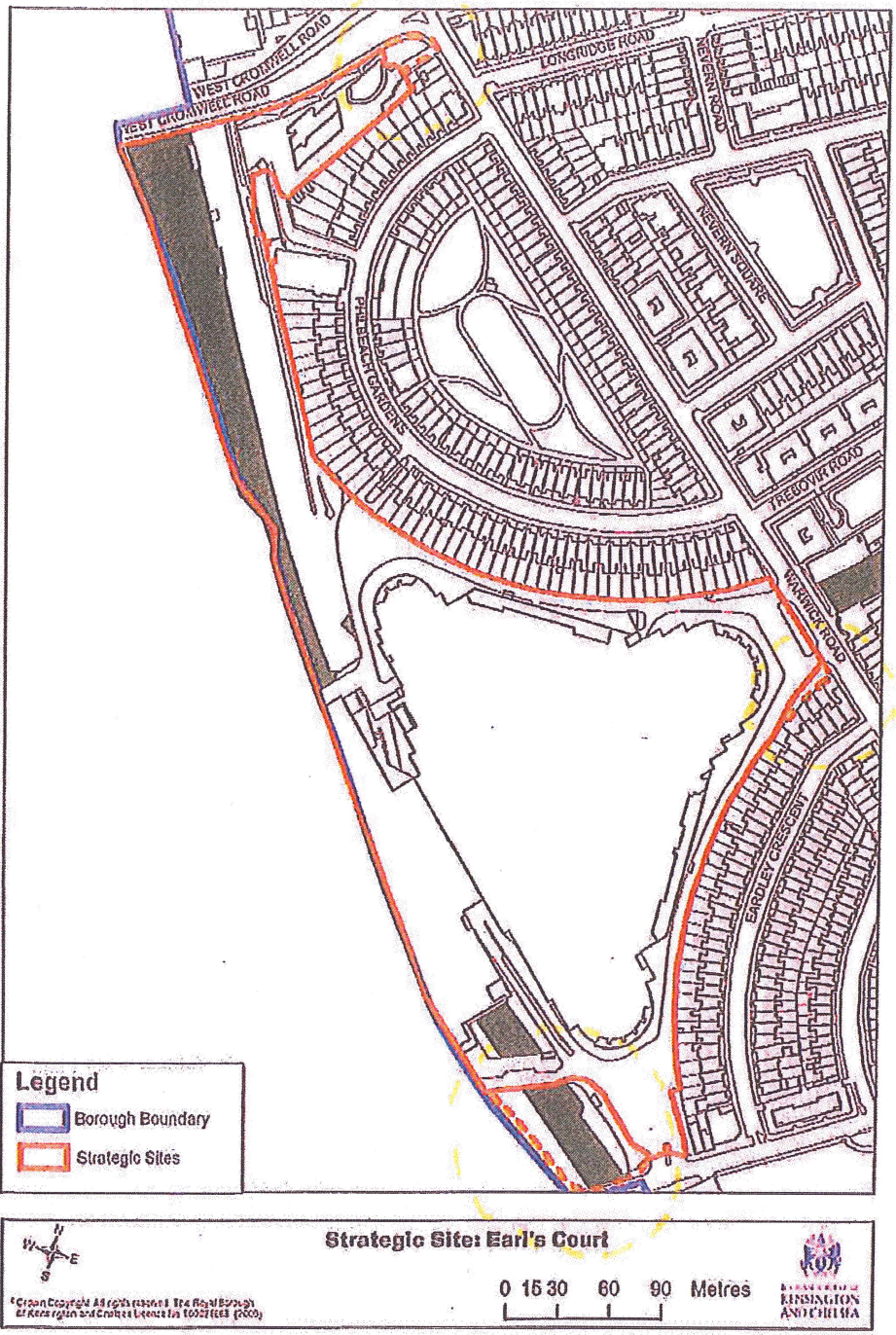
### Proposals Map

11. C&C propose that the site boundary for the Earls Court Strategic Site is amended to reflect the boundary of the Earls Court Regeneration Area within RBKC as illustrated on the attached plans at Appendix 1.









AREA OF CHANGE.

PROPOSED AMENDMENT TO BOUNDARY