

**WRITTEN STATEMENT**

**OF**

**EARLS COURT & OLYMPIA GROUP**

**FOR**

**LONDON PLAN EXAMINATION IN PUBLIC  
MATTER 2F**

## **Introduction**

1. This Written Statement is submitted by Capital & Counties (C&C) on behalf of Earls Court & Olympia Group (ECOG). It follows representations to the draft Replacement London Plan (RLP) in January 2010. The representations include a suite of evidence base documents concerning the development potential of the Earls Court & West Kensington Opportunity Area (ECWKOA), which is a newly designated Opportunity Area. The evidence base documents (dated January 2010) comprise a **Place Making Report, Housing Capacity Report and Employment Capacity Report**.
2. Since January 2010, additional evidence base documents have been produced to support C&C's representations and EiP Written Statements. The additional documents (dated June 2010) comprise a **Transport Report (RD50), Office Assessment (RD51) and Retail and Leisure Assessment (RD52)**.

### **A. What is the role of the proposed Opportunity Area Frameworks and are they likely to compromise LDF formulation?**

4. The RLP clearly envisages OAPFs to be produced for Opportunity Areas (Policy 2.13, para 2.58 and Annex 1). This is consistent with Government guidance e.g. Circular 1/2008 confirms (paragraph 2.22-5) that the Mayor may issue guidance to supplement policies in the London Plan, including area frameworks.
5. RLP (Annex 1) explains that OAPFs can take different forms depending on local circumstances. C&C considers that OAPFs can provide an important layer of strategic supplementary guidance to clarify London Plan policy, pull together key regional strategies and assist in LDF preparation. OAPFs enable stakeholders to agree priorities and guidelines. They should provide an appropriate level of detail to guide development, but not prescribe how or when it will happen. Importantly, they should not prevent schemes coming forward nor slow down development. The actual status and role of OAPFs in relation to LDFs should be explained more clearly. As part of this, it should be clarified that in some local circumstances, strategic SPD produced at the Borough level for Opportunity Areas can form the basis of an OAPF or be a SPD to the London Plan.

### **B. Are the strategic policy directions in Annex 1 sufficiently strategic...?**

6. Annex 1 identifies strategic policy directions and figures representing indicative employment capacity and minimum new homes for each Opportunity Area. These need to be considered together in order to understand the sufficiency and soundness of the policy directions. Indeed, the introductory text to Annex 1 explains that the employment and housing figures are integral to RLP Policy 2.13 'Opportunity Areas'.

8. The policy directions, employment and homes figures should be founded on credible up-to-date evidence. They should also:
  - a. reflect RLP Opportunity Area policy objectives; and
  - b. take into account the scale of the opportunity and the evidence in place to support significant land use change.
9. **ECWKOA is currently allocated for 7,000 indicative new jobs and 2,000 minimum new homes.** The associated strategic policy direction explains that the Opportunity Area presents a significant regeneration opportunity. However, C&C's representations make clear that the job and housing numbers are insufficiently strategic and do not properly reflect the strategic opportunity of the ECWKOA. This is supported by the robust evidence base documents mentioned in paragraphs 1 and 2.
10. **C&C ask that the indicative employment and minimum new homes figures are revised to reflect the strategic potential of the ECWKOA and up-to-date robust evidence.** The evidence prepared by C&C demonstrates clearly that the current ECWKOA figures are not founded on credible evidence and are based upon overly conservative and out-of-date assumptions.
11. **A more strategic and reasonable policy direction for ECWKOA would be achieved if the current Annex 1 figures were revised to 24,000 indicative jobs and 8,000 minimum new homes.** The case for this is explained in a suite of evidence base documents (noted in paragraphs 1 and 2). The headline points C&C would like addressed through discussion at the Examination in Public are, as follows:
  - a. The ECWKOA is a centrally located, large, accessible and underutilised area of London. It represents the chance to deliver substantial land use change and mixed use development. It is a key opportunity to deliver large scale regeneration consistent with policy directions set out in the RLP with scope to optimise development density and deliver associated infrastructure improvements. However, as explained in the Place Making Report (January 2010), this is not properly conveyed in RLP Annex 1. An increase in job and housing figures is required to properly reflect the scale of opportunity that should be realised.
  - b. The Place Making Report (January 2010) demonstrates that the current proposed job and housing figures are clearly based on an unreasonable and unrealistic low density level (approximately 135 units per hectare and equivalent to a poorly accessible urban site), whereas the ECWKOA is centrally located and already benefits from high levels of accessibility. Redevelopment of the ECWKOA at a density commensurate with higher accessibility in line with RLP policies would deliver approximately 8,000 new

homes and this ought to be the minimum indicated.

- c. The Housing Capacity Report (January 2010) considers household growth, housing need and how the RLP proposes to locate additional housing supply. It concludes that:
- Significant household growth in London's population is projected to 2031 and significant new housing provision is required to meet this growth.
  - Historic delivery of housing in London has fallen short of the level now being proposed within the RLP. It is, therefore, an ambitious target.
  - Importantly, there is a deficit of supply in West London, where there is high demand and where the ECWKO is located.
  - Opportunity Areas have a crucial role to play in meeting housing targets.
  - In particular, the ECWKO is well placed to accommodate growth. It is in a location where the population projections indicate significant growth and the scale of the opportunity enables a sustained approach.

This reinforces the case for a significantly increased amount of minimum new homes for the ECWKO.

- d. A Transport Report (June 2010) has been undertaken by WSP Group in accordance with a methodology agreed with Transport for London (TfL). It provides a strategic assessment and underlying evidence about the capacity of the ECWKO over the next 20-25 years (the RLP plan period).

The Report tests a series of development scenarios which cover a range of population and density level assumptions for the ECWKO. The tested scenarios range from 5,560 to 9,783 homes and 12,165 jobs to 31,895 jobs which all significantly exceed the current draft RLP low number of a minimum of 2,000 new homes and an indicative number of 7,000 new jobs. The scenarios take into account expected growth in housing and employment across London, including the nearest other Opportunity Areas set out in the RLP.

Overall, the Report provides strong further evidence on transport grounds to support a significant increase in the proposed job and housing figures for the ECWKO in accordance with C&C's representations. The analysis demonstrates that there is sufficient capacity within the transport network to accommodate **all** the development scenarios tested, some of which are higher

than being sought as the minimum by C&C at this stage. The Transport Report serves to justify C&C's case that the current figures are not sufficiently strategic and do not represent up-to-date evidence or take into account the role of public transport accessibility and capacity.

It is important to recognise that development quantum much greater than that currently proposed in RLP can be accommodated without requiring significant investment in new transport infrastructure. This is a major advantage of ECWKOAs when compared to other Opportunity Areas.

- e. Annex 1 strategic policy direction for ECWKOAs explains that the Opportunity Area has the potential for 'strategically significant offices'. However, this is not represented in the corresponding indicative employment capacity figure of only 7,000 new jobs. There is inconsistency between the policy direction and the proposed indicative employment capacity which effectively results in an unrealistic and unsound allocation. Evidence produced by CBRE in an Employment Capacity Report (January 2010) and Office Assessment (June 2010) clearly demonstrates that a more robust and strategic indicative employment capacity for the ECWKOAs, which takes into account the potential of substantial land use change over the plan period, is 24,000 jobs. This is due to various factors:

- There is a clear need for sufficient long term employment capacity in suitable locations. In particular, the West End is significantly under-supplied with office space relative to forecast levels of demand growth over the RLP period.
- Suitable locations for expansion of the West End are likely to be located to the west of CAZ given well-developed, longstanding trends.
- The boroughs of RBKC and LBHF present obvious and logical places to seek opportunities for new significant new office development to accommodate West End expansion. Overall, the two boroughs do not have adequate supply capacity to accommodate significant expansion. There is a need for additional office supply capacity within the two boroughs in a suitable accessible location.
- The ECWKOAs has high accessibility and physical capacity for significant office development as part of a major new mixed use district, creating a modern West End environment.
- Having regard to the need for a critical mass – as supported by evidence from other business hubs in London – provision of 300,000 sqm of office floorspace would be the minimum appropriate for ECWKOAs as a strategically significant office location. This quantum of floorspace would yield in the order of 20,000 new jobs. When the

job creation from other land uses is taken into account, the ECWKOA could provide approximately 24,000 jobs. This is significantly greater than the current indicative employment capacity figure in Annex 1 of the RLP and demonstrates the unsound and unstrategic approach that has been taken to the figures.

For the key headline reasons explained above, and as justified in the Employment Capacity Report (January 2010) and an Office Assessment (June 2010), the ECWKOA indicative employment capacity figure should be revised.

- f. The draft policy relating to the ECWKOA does not adequately recognise the potential benefit of access to jobs and services that development in the area would offer; nor does it sufficiently recognise the advantages of locating economic activity and development in an area where high levels of accessibility to public transport can be achieved.

**C. Should Annex 1 include a programme for delivery of homes and jobs within each area?**

12. C&C does not consider it appropriate for Annex 1 to include a programme for delivery. This is something that should be established in broad terms through OAPFs and will, in any event, be subject to change due to market forces and realities. A delivery programme would be misleading and is likely to be inconsistent given the varying amounts of evidence available for each Opportunity Area.
13. It is more important for Annex 1 to include reasonable and sound allocations for indicative employment capacity and minimum new homes for each of the Opportunity Areas - particularly new Opportunity Areas. As already explained in response to question (b), in the case of ECWKOA, the currently proposed indicative employment and minimum new homes figures are based on unsound assumptions. This is particularly the case given the 20-25 year plan period and the significant amount of clear evidence which is in place to support significantly greater figures being realised at ECWKOA over this period. There is no credible evidence to the contrary.

**D. Should there be checks on excessive office development?**

14. Specific checks on office development would be inappropriate and could harm the development of Opportunity Areas. Opportunity Areas are the primary areas designated to accommodate London's growth, it is appropriate that office development is considered as part of the development mix with some areas having greater potential than others e.g. ECWKOA as explained in paragraph 11d. The adoption of indicative employment figures is sufficient in these circumstances.

15. The level of proposed office development within individual areas will be tested through Opportunity Area Planning Frameworks, or the equivalent planning guidance and/or planning application processes in accordance with Planning Policy Statement 4.