

WRITTEN STATEMENT

OF

EARLS COURT & OLYMPIA GROUP

FOR

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

1.0 Introduction

- 1.1 This Written Statement is submitted by Capital & Counties (C&C) on behalf of Earls Court & Olympia Group (ECOG) with regard to the Earls Court & West Kensington Opportunity Area (ECWKOA).
- 1.2 The ECRA constitutes the majority of the ECWKOA identified as a location for strategic growth and change in the draft Replacement London Plan (RLP).
- 1.3 The ECRA straddles the borough boundary between the Royal Borough of Kensington and Chelsea (RBKC) and London Borough Hammersmith & Fulham (LBHF). It is recognised by both authorities as a development opportunity in their respective Core Strategies.
- 1.4 The draft RLP identifies Opportunity Areas (OAs) as “the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility”. It advises that development densities for residential and non residential development should be optimised. The ECWKOA is identified in Annex 1 as a “significant opportunity for regeneration comprising estate renewal and housing and employment growth” where “the potential for a strategic leisure, cultural and visitor attraction and strategically significant offices should be explored together with retail, hotels and supporting social infrastructure”.
- 1.5 The future development of the ECWKOA would realise regeneration on a strategic scale. The location and accessibility of the ECWKOA provides the chance to create and evolve a new urban quarter and town centre.
- 1.6 C&C have submitted a **Retail and Leisure Assessment (Core Document RD52)** setting out how a new District Centre at ECWKOA, as a minimum, is acceptable in terms of retail capacity, sequential approach and retail impact. The document concludes that the development scenarios assessed for ECWKOA generate a floorspace capacity for retail (use classes A1-A5) ranging from 15,836 – 66,699 sqm, there are no sequentially preferable sites to accommodate this need and that the ECWKOA proposals are likely to have less than 2.5% impact on any individual centre, an acceptable level of trade diversion that is unlikely to have a detrimental effect on individual centres vitality and viability. Even using the lower development scenario, this translates as a new District Centre, rising to a new Major Centre utilising the medium and upper development scenarios. It is considered that the allocation of a new District centre, as a minimum, at ECWKOA complies with the requirements of PPS 4.

2.0 **Response to Issues for Discussion**

2.1 Of the list of issues identified for discussion, C&C only wish to comment on issue (c).

(c) Should there be a more positive approach to driving the pattern of retail centres in London which is less reliant on maintaining the status-quo, for example with a small number of metropolitan centres growing into “super-hubs”, provision of new centres (such as within the VNEB Opportunity Area) and focused investment in other centres?

2.2 The RLP should be more positive in its promotion of the retail development outside of existing centres by giving greater recognition to the potential for Opportunity Areas, such as ECWKOAs, to deliver new retail centres as part of their overall regeneration. A number of the OA's, such as ECWKOAs, generate their own requirement for retail, leisure and other town centre development as a result of significant increases in residents and employees. Allowing for the designation of new centres within OA's would assist in creating mixed-use and sustainable communities within those areas. Whilst such retail development in the OA's should not be to the detriment of existing centres, it is imperative that their development potential is not stifled through maintaining the status quo in the retail hierarchy.

2.3 The ECWKOAs have the potential to provide a retail, leisure and office centre at the heart of a strategic area of regeneration and renewal. This should be flagged up much more strongly in the RLP. C&C proposes the allocation of the site as a new District Centre as a minimum for the reasons set out below and covered in more detail within the Retail and Leisure Assessment:-

- a. National planning policy focuses on regeneration of brownfield sites for high density mixed use development. Significant emphasis is placed upon creating sustainable communities with easy access to places of work, shops and facilities.
- b. Further, national guidance advises regional authorities to be positive, proactive and flexible in setting policies for their network and hierarchy of centres. Identified deficiencies should be addressed by either promoting existing centres to function at a higher level or through the designation of new centres.
- c. It is the very nature of OAs that they are areas of planned substantial land use change and high density mixed use development, at a scale which can involve the development of new centres, as referred to in suggested amendment 2.53 of the draft RLP.
- d. ECRA has been identified in the draft RLP as forming the majority of the ECWKOAs, with its planned mixed use regeneration and growth. Annex 1

identifies the ECWKOAs as a significant high density regeneration opportunity with potential for various mixed uses, including town centre uses.

- e. ECRA has the potential to provide a hub for the ECWKOAs, focusing on key town centre uses such as retail, leisure, employment space and social and community uses, along with a significant element of residential. The site can incorporate hotels, leisure, restaurants/bars and various community facilities. When these town centre uses are factored in with the proposed residential, office and retail offer it creates a genuine mixed-use place with the potential for a large number of linked trips.
 - f. ECWKOAs will deliver a significant number of new homes and jobs. This will generate expenditure that would be sufficient to support town centre uses within the ECWKOAs.
 - g. The ECWKOAs can deliver a vibrant place in line with the draft RLP aspirations for the ECWKOAs and in accordance with what one would expect of an area designated as a District Centre.
 - h. The designation of the ECWKOAs as a District Centre, as a minimum, would be consistent with policy advice in PPS4, for the following reasons.
 - There would be a need for the town centre uses of retail and leisure. The technical analysis carried out by DP9 demonstrates that redevelopment of the ECWKOAs is likely to be of a scale that will lead to sufficient indigenous generated expenditure to justify the provision of floorspace at a minimum, of a level which would be consistent with District Centre designation as defined in the draft RLP.
 - The provision of these uses within the ECWKOAs, close to the new residential and office development that they would be intended primarily to serve, would allow that need to be satisfied in a highly sustainable and accessible location as part of a broader mix of uses, consistent with the underlying objective of the sequential approach.
 - A scheme with the characteristics of District Centre at ECWKOAs would have no material adverse impact on the vitality and viability of neighbouring centres.
- 2.4 The main purpose of both the retail and leisure uses will be to serve the significant number of new residents and office workers that will be generated by the proposals. Analysis by DP9 indicates that the likely development scenarios for the ECWKOAs generate a retail (use classes A1-A5) floorspace capacity ranging from 15,836 – 66,699 sqm (gross). In addition, there is a clear and defined need for the likely quantum of leisure proposed, particularly bearing in mind the existing use of the site.

- 2.5 Therefore, we conclude that a District centre will have a limited effect on existing nearby centres. Indeed, it is likely that the other centres will benefit from the significant additional expenditure generated by ECWKO A, as it is not realistic to assert that all of the money generated will be spent at the site.
- 2.6 Nonetheless, DP9 have calculated the worse case scenario, where only approximately 50% of the comparison goods floorspace proposed in the highest development scenario is met by ECWKO A generated expenditure. A benchmark impact assessment has been carried out to analyse the likely levels of trade diversion from nearby centres.
- 2.7 As set out in the C&C's Retail Evidence Base Document, the ECWKO A proposals are likely to have a less than 2.5% impact on any individual centre, a more than acceptable level of trade diversion that is unlikely to have a detrimental effect on the individual centres vitality and viability.
- 2.8 The analysis set out in C&C's Retail Evidence Base Document is reinforced by borough wide retail and leisure studies undertaken on behalf of LBHF and RBKC, both of which demonstrate that there is capacity to support substantial retail and leisure development in RBKC/LBHF in the period between now and 2026.
- 2.9 **Accordingly, we request that Table A2.2 of Annex 2 to the draft RLP be amended to incorporate a reference to the ECWKO A having the potential to accommodate a new District Centre. We also request that this is reflected in Annex 1 Ref.8 of the RLP in relation to the Strategic Policy Direction for the ECWKO A. It should be made clear that the ECWKO A has the potential to realise a new District Centre, as a minimum, based on the evidence contained in C&C's Retail and Leisure Assessment.**