

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

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**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 by C&C 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 the Earls Court and West Kensington Opportunity Area.
3. This Written Statement addresses Matter 4 – Keeping Life Local and is consistent with representations previously submitted by C&C. RBKC has incorporated some changes in response to C&C’s representations as the Core Strategy has evolved. However the RBKC Submission Core Strategy requires further amendment in respect of “Keeping Life Local” 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 do not have any specific responses to the questions raised under this matter. However, C&C would like to draw to the Inspector's attention their previous representations on the Proposed Submission Core Strategy, as follows.

**Social and Community Uses, Local Shopping Facilities, and Walkable Neighbourhoods Plan (p.167)**

6. C&C propose that brown shading across land within LBHF is added to denote the Earls Court Regeneration Area "wider site", as illustrated on the Key Diagram plan (p.10).
7. RBKC's response to earlier representations state that the proposed change is unnecessary and repetitive as the wider area is indicated elsewhere in the document. The RBKC Submission Core Strategy text acknowledges that existing deficiencies in local shopping facilities in the Earls Court area are expected to be addressed through redevelopment of the Earls Court Regeneration Area (30.3.9). However, the location of retail facilities on the site will be determined through the Masterplan process and may be on land within LBHF. Denoting the wider Earls Court Regeneration Site (as illustrated on the Key Diagram) will clarify the position for the reader and provide consistency across the document making it effective.

**Corporate or Partnership Actions for Keeping Life Local (p.170)**

8. C&C propose a new bullet point (16) as follows:
  16. **The Directorate of Planning and Borough Development will work with LBHF and the GLA to prepare a Supplementary Planning Document to bring forward redevelopment of the Earls Court Regeneration Area**
9. It is necessary to include a specific corporate action for the preparation of a Supplementary Planning Document to bring forward this development opportunity as this will help meet the strategic objective for keeping life local and is consistent with the rest of the Core Strategy. The proposed change explains the deliverability of this benefit, making the document effective and sound.

**REP/139439/26**  
Capital & Counties  
Participant No. 139439  
**Matter 4**