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Dear Sir / Madam

## **A City for all Londoners**

### **Representations by EC Properties LP on behalf of Capital & Counties Properties plc and its subsidiary companies in relation to the Earls Court and West Kensington Opportunity Area**

1. These representations are submitted by EC Properties LP ('ECP') on behalf of Capital & Counties Properties plc ("Capco") and its subsidiary companies, including Earls Court Partnership Limited, a joint venture between Capco and Transport for London ("ECPL"), who together are bringing forward the comprehensive regeneration and redevelopment of the Earls Court and West Kensington Opportunity Area ('ECWKO A').
2. The representations follow those submitted by Capco in June 2016, responding to the GLA's 'call for sites' and to inform the preparation of the new London-wide Strategic Housing Land Availability Assessment.
3. Capco considers the 'City for all Londoners' document to be an important and positive direction of travel in advance of the draft London Plan next year. The document rightly identifies the pressure on London to deliver substantial growth and requires Opportunity Areas, such as ECWKO A, to be intensified and for land in accessible locations to be used efficiently. This is especially important where public land is involved in partnership with the private sector. Capco supports the Mayor in ensuring that the development of Opportunity Areas occurs consistent with the principles of 'good growth'.
4. The ECWKO A is one of the most important Opportunity Areas in London. Its redevelopment is well advanced and has broad support, plus a large part of the redevelopment is being delivered through a public-private partnership with TfL, which generates significant income for the public sector. It is centrally located and benefits from high accessibility, being well served by excellent transport links.
5. The ECWKO A presents an opportunity to deliver on the Mayor's vision set out in 'A City for all Londoners' and become a template for 'good growth'. Whilst planning permission is already in place to deliver 8,000 new homes, there is the opportunity, through a review of the master plan, to deliver significantly more value to the public sector and up to 10,000 new homes for London, which includes more affordable housing.



## **Background to the ECWKOA**

6. The 'City for all Londoners' document identifies the importance of Opportunity Areas and the need for their redevelopment to be both intensified and accelerated.
7. The ECWKOA is well placed to assist the Mayor in achieving the principles and direction of travel set out in 'A City for all Londoners'. In summary, and by way of background:
  - a) The ECWKOA comprises approx. 38 hectares and spans two London Boroughs; the London Borough of Hammersmith & Fulham ('LBHF') (approx. 29 ha of the Opportunity Area) and the Royal Borough of Kensington & Chelsea ('RBKC') (approx. 9 ha).
  - b) The ECWKOA comprises mainly brownfield land including the former Earls Court Exhibition Centres, the Lillie Bridge transport depot and two housing estates; West Kensington & Gibbs Green Estates.
  - c) The ECWKOA is one of the best located Opportunity Areas in London. Enjoying a PTAL rating of 6A and with access to three underground and one overground train station.
  - d) The ECWKOA is designated in Annex 1 of the current adopted London Plan. It also benefits from strategic site specific policies at a local level and a Supplementary Planning Guidance which provides a suite of principles and policies to guide comprehensive development on a phased basis.
  - e) Planning permissions are in place for comprehensive development (and are summarised at Appendix 1).
  - f) Substantial progress has been made in the implementation and delivery of development in the Opportunity Area and significant investment has been committed.
  - g) A large part of the redevelopment of the ECWKOA is being delivered through ECPL, a public-private partnership between Capco and TfL designed to deliver housing on public land and generate long term revenue streams for investment in TfL infrastructure.

## **The Importance of Opportunity Areas and High Density to London's Growth**

8. Capco considers that the Mayor's 'A City for all Londoners' sets out a clear basis upon which key principles can be developed to underpin a new London Plan. The direction of travel of the Mayor's key themes such as 'Good Growth' and 'Healthy Streets' are supported.
9. Policies in relation to the delivery of housing, the creation of employment, unlocking the potential of public land, the optimisation of development in Opportunity Areas and strategic development opportunities at key transport nodes will be vital to London's growth and the success of a new London Plan.
10. Capco supports the pro-development approach that runs as a theme throughout the 'City for all Londoners' document especially in Opportunity Areas. Opportunity Areas have the potential to accommodate significant development due to their ability to accommodate mixed use high density development close to new and enhanced infrastructure. The development output and density within Opportunity Areas should therefore be maximised.
11. Capco feels strongly that the approach to Opportunity Areas – as focal points for growth – should be bold. Opportunity Areas such as Earls Court are substantial enough for well-designed high density



development to be achieved in a manner that can deliver a new place or destination and respond to and connect with existing communities.

12. Policies within a new London Plan should build on this context and emphasise the need for Opportunity Areas to be planned comprehensively and collaboratively and to the highest possible density. This is especially the case in Opportunity Areas, such as Earls Court, where significant public land is included. In such locations, public land should be utilised and optimised to ensure the delivery of new homes and economic output.
13. It should be made clear within a future London Plan that development density is to be highest within centrally located Opportunity Areas. Without a bold approach to density, which increases plot ratio and challenges current design standards, there is a risk that the housing need identified within the ‘City for Londoners’ document will not be met. Alongside future Opportunity Area policies, the new London Plan will need to consider how best to maximise density. This should include a wholesale review of design, amenity and development standards and consider ways in which different building typologies – learning lessons from well-established areas and districts in Central London – can achieve high density living without compromising on housing quality. Current standards are too constraining and cumbersome considering the severe housing challenge facing the capital.
14. As part of developing the new London Plan, the Mayor and his team should consider ways in which Opportunity Areas with existing masterplans and planning permissions can be intensified expediently and consider mechanisms for accelerating delivery of new homes.

#### **‘Good Growth’**

15. ‘Good growth’ is a central theme running through the ‘City for all Londoners’ document. Key principles relevant to Opportunity Areas, such as ECWKO, include, inter alia:
  - a) Intensification of development in accessible locations;
  - b) Optimisation of development of public sector land;
  - c) Mixed use development to support economic growth;
  - d) Build up around stations;
  - e) High density development in the right locations; and
  - f) Importance of placemaking and ‘Healthy Streets’.

#### **The Delivery of ‘Good Growth’ at Earls Court**

16. Following an architectural competition overseen by CABI, in 2010 Terry Farrell and Partners were appointed to prepare a comprehensive Masterplan for the ECWKO. A Masterplan was produced through an extensive process of design collaboration and engagement with various stakeholders.
17. The Masterplan seeks to achieve a coherent and unified development, provided in phases. It provides a framework for the comprehensive delivery of a new district in West London and establishes a clear set of guiding principles that responds well to the objectives of ‘A City for All Londoners’.



## 18. The Masterplan:

- a) Creates a new district for London;
- b) Delivers significant new homes and jobs for London;
- c) Delivers a new High Street with a mix of uses including retail, leisure, cultural and social infrastructure that will provide a vibrant new destination to live, work and visit;
- d) Connects existing communities by providing a legible network of streets encouraging walking, cycling and the use of public transport;
- e) Creates new neighbourhoods or 'villages' that provide new public space, amenities and facilities that encourage socialising and integrate with existing communities;
- f) Delivers accessible public realm and significant amounts of green open space including the new Lost River Park and a series of garden squares;
- g) Proposes a mix of uses that minimises the need to travel by car, makes the most of the high PTAL rating and offer greater economic opportunities;
- h) Establishes the principle of high density through different building typologies, including tall buildings;
- i) Comprehensively regenerates existing Council housing estates and provides new replacement estate housing in different forms in line with needs; and
- j) Utilises public sector land and in particular TfL land through a joint venture partnership.

19. The Masterplan has formed the basis of all planning applications and permissions that have come forward to date. These are summarised in the appended schedule.

20. The appended schedule demonstrates that planning permissions are in place for the delivery of 8,000 new homes. In addition to this, approved development includes a mix of offices, hotels, workspace, education and community facilities as well as a new destination for leisure and culture. The total quantum of consented development is 1,100,618 sqm.

21. In summary, the consented development provides for the following planning benefits:

- a) 8,000 new homes;
- b) 1,611 affordable homes (including £1.9m in affordable housing contributions);
- c) 10,000 new jobs;
- d) 2,250 construction jobs per annum;
- e) £43.5m of investment in social infrastructure (including new leisure and health facilities and a primary school);
- f) £8.5m contribution for skills and training initiatives;
- g) £38.2m of improvements to local tube stations;



- h) £5.9m of investment in bus service enhancements and bus stops;
- i) £1.3m of investment in cycle hire hubs, parking spaces and lanes;
- j) £50m of Mayoral CIL payments;
- k) £82.7m new homes bonus; and
- l) £2.5bn construction-related Gross Value Added (GVA).

In total, the above amounts to a benefits package valued at nearly £500m.

### **The Opportunity to Enhance the Earls Court Masterplan**

22. As already explained, it is vital that Opportunity Areas are fully optimised to ensure the highest possible densities and new homes are achieved. This is especially relevant for those Opportunity Areas, such as ECWKO, which are centrally located, benefit from high accessibility and include substantial brownfield land in public ownership that may be either surplus to requirements or under-utilised.
23. A masterplan and associated planning permissions are in place for ECWKO. But, for large-scale projects of this nature, that will be built out over long timeframes and across different political and economic cycles, it is only right that their development output and contribution is kept under review. As policies and standards change and adapt, especially to ensure Opportunity Areas can be delivered at highest possible densities, the ability for the current ECWKO masterplan to achieve more must be considered. This is especially important owing to the favourable development and delivery credentials of ECWKO.
24. In this context, and owing to numerous factors and changes in circumstances since the current masterplan was approved – including property acquisitions, the growth in London’s population and the increasingly critical need for new homes, change in local and regional political leadership, a change in economic context – the actual housing output for the ECWKO is expected to be higher than 8,000 new homes. There is a positive opportunity to review the approved masterplan now to achieve higher density to meet housing need and deliver further on the principles of ‘Good Growth’ as introduced in ‘A City for all Londoners’.
25. The ECWKO has significant potential to evolve and respond to London’s future needs. Optimising the development of the ECWKO can have significant benefits to housing delivery for the next London Plan (both in terms of overall total output as well as mix and tenure). Making the most of Opportunity Areas and realising the full development potential of public land is clearly a fundamental component of meeting London’s growth needs and fostering economic prosperity.
26. Initial discussions have taken place with GLA and Borough officers in relation to potential for a revised masterplan for the ECWKO. A review process undertaken by Capco has identified the possibility for optimising the masterplan, which could realise significantly more new homes, including more affordable homes for Londoners, different housing tenures and other public benefits, including more employment opportunities and more publicly accessible open space.



27. Inspired by a 'City for all Londoners', initial masterplanning work has demonstrated an optimised masterplan for the ECWKOA could result in:

- a) Increased density: utilising a more efficient site coverage, an urban approach to design/development standards and delivery of a range of building typologies – including mansion blocks and a new tall building cluster;
- b) Greater public sector benefits: Significant value to the public sector to fund much needed infrastructure and housing within London, substantially increasing the package of planning benefits associated with the masterplan;
- c) Increased delivery of homes: at least 10,000 new homes, including more affordable housing, re-housing and compensation for existing estate residents;
- d) Homes for Londoners: Opportunity to re-focus housing tenures to deliver Homes for Londoners including London Living Rent, PRS and homes for low cost rent and sale;
- e) Varied employment opportunities: Increased quantum of commercial floorspace – including office, flexible workspace & investment in local skills and training;
- f) More jobs: at least 15,000 jobs created;
- g) More green space: Increased Lost River Park and areas of public realm; and
- h) More cultural and social infrastructure: Enhanced provision to meet the needs of the local and wider community to create a new 'destination' in West London.

28. Capco envisage moving forward with the Mayor and a wide range of stakeholders during the first half of 2017 on a review of the Earls Court Masterplan. These discussions will be supported by necessary design work and technical assessments to test the above and ascertain the optimum development capacity of the ECWKOA. This work will be important in informing an updated designation for ECWKOA within the draft London Plan.

### **Way Forward**

29. Capco looks forward to engaging with the Mayor and GLA officers in the new year. As above, this will include engagement associated with a review of the approved Earls Court Masterplan. Additionally, Capco, as appropriate, is willing and able to assist in the formulation of the London Plan approach to Opportunity Areas, high density and design/development standards.

30. We look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please contact Craig Tabb or Richard Foot of this office.

Yours faithfully,

DP9 Ltd.

**DP9 Ltd**



## APPENDIX 1 - ECWKOA SCHEDULE OF PLANNING PERMISSIONS

Site (Permission Ref.)	Permission Date	Quantum of Development (m <sup>2</sup> GEA)*	No. of Homes	Other Approved Land Uses
<b>Lillie Square</b> (2011/02000/FUL, superseded by 2013/01213/VAR)	30 <sup>th</sup> Mar 2012 (superseded 29 <sup>th</sup> Aug2013)	91,743	807	Gym facility (Class D2)
<b>Earls Court Masterplan - RBKC 'OPP 1'</b> (PP/11/01937)	14 <sup>th</sup> Nov 2013	168,333	930	Retail (Classes A1-A5); Offices (B1); Hotel and Serviced Apartments (C1); Leisure/ Education/Health/ Community/ Culture (D)
<b>Earls Court Masterplan - LBHF 'OPP 2'</b> (2011/02001/OUT)	14 <sup>th</sup> Nov 2013	771,334	5,845	Retail (A1-A5); Offices (B1); Hotel and Serviced Apartments (C1); Education/ Health/ Community/ Culture (D1); Leisure (D2)
<b>1-9 Lillie Road</b> (2013/02620/FUL)	5 <sup>th</sup> Mar 2014	8,970	65	Retail (Classes A1/A3); Leisure/ Community (D1/D2)
<b>ESB Change of Use</b> (2013/05175/FUL)	22 <sup>nd</sup> May 2014	57,669	340	Retail (A1-A4)
<b>West Brompton Square</b> (PP/15/00369)	1 <sup>st</sup> Apr 2015	2,569	16**	Retail (A1)
<b>Totals</b>	-	<b>1,100,618</b>	<b>8,000**</b>	-

\* Excludes 'ancillary' floorspace

\*\* Overlaps with OPP1 land, resulting in a net increase of 13 dwellings on the 930 approved under OPP1