

Hammersmith and Fulham Local Plan Examination
Question 9: Regeneration Area Strategies – Fulham
EC Properties LP (50)

Question 9:

- **Are Strategic Policies FRA and FRA 1 justified, with regard to reasonable alternatives, and will they be effective?**
- **Are Strategic Policies FRA and FRA1 justified in terms of redevelopment/renewal, housing numbers and the policy wording?**

1. This Written Statement is 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 proposals for the comprehensive regeneration of the Earls Court area (part of the Fulham Regeneration Area).
2. We refer to our representations submitted to the Proposed Submission Local Plan Regulation 19 Consultation in September 2016 (refer to pages 152-161 of Examination Document 'EX6').
3. We support the Council's modifications to Policies FRA and FRA1 at MC55 and MC56 (refer to item 591, pages 156-161 of EX6).
4. However, the amendment in the Glossary to the definition of Estate Renewal at MC20 is not sufficiently clear and should be consistent with Policies FRA and FRA1 to refer to redevelopment. We suggest the definition is amended as follows:

"Estate Renewal – area-based programmes that physically renew housing stock through, refurbishment, redevelopment or other change to enable improved housing opportunities for local residents and to support economic regeneration in this area".
5. Without the above amendment, the definition remains ambiguous in terms of redevelopment and regeneration. It must be made clear, particularly given the importance of the comprehensive redevelopment of the West Kensington and Gibbs Green Estates to the successful delivery of Policies FRA and FRA1 and to the Council being able to meet its housing trajectory.
6. Policies FRA and FRA1 as amended are justified with regard to the NPPF, the London Plan, ECWKO, stated and assumed housing pipeline for the FRA in the draft Plan, the extant planning permissions for the regeneration of the Earls Court area including the redevelopment of the estates and the land contract (known as the 'CLSA') approved by the Secretary of State and completed in January 2013, triggering the Council's sale of the land to Capco. All have been publically consulted and informed by substantial evidence including the Council's sustainability appraisal 2015, supporting comprehensive regeneration of the estates and the significant contribution to housing made by the FRA.

End.

22nd May 2017