GERALDEVE

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldeve.com

Director of Place Shaping & Town Planning
Westminster City Council
City Hall
64 Victoria Street
London
SW1E 6QP

FAO: Matthew Mason

22 May 2020 **BY EMAIL AND PLANNING PORTAL**

Our ref: JCW/GBR/JOR/AROB/J8038

Your ref: PP-08439241

Dear Madam

Development site bound by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street, known as 'Cundy Street Quarter'
Application for Planning Permission and Listed Building Consent

We write on behalf of our client, Grosvenor Estate Belgravia (hereafter referred to as the Applicant), to apply for planning permission and listed building consent for the comprehensive redevelopment of the 'Development site bound by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street' (hereafter referred to as the Site), London.

Planning permission is sought for the following:

"Comprehensive residential-led mixed-use redevelopment, including demolition of Kylestrome House, Lochmore House, Laxford House, Stack House, Walden House and structures attached to Coleshill Flats; tree removal and pollarding; erection of a partial sub-basement, basement and buildings varying in height from five to 11 storeys, to provide affordable homes (Class C3), market homes (Class C3), senior living accommodation (comprising Class C3 and / or Class C2), alongside a range of uses at partial sub-basement, basement and ground floor level including retail (Class A1), restaurants / cafes (Class A3), drinking establishments (Class A4); offices (Class B1), community space (Class D1), cinema (Class D2); use of the lower ground floor of the Coleshill Flats as retail and / or workspace (Class A1 and / or B1); provision of new pedestrian routes; basement car parking; basement and ground floor circulation, servicing, refuse, ancillary plant and storage; provision of hard and soft landscaping; landscaping works and creation of new play facilities at Ebury Square; rooftop PV panels; rooftop plant equipment; refurbishment and relocation of Arnrid Johnston obelisk to Five Fields Row; refurbishment and relocation of the water fountain on Avery Farm Row; repair and relocation of the telephone boxes on Orange Square; and other associated works."

Listed building consent is also sought for the following:

"Demolition of structures attached to Coleshill Flats on Pimlico Road; works to the eastern boundary wall at the eastern side of Coleshill Flats on Pimlico Road; minor alterations to the rear facade of the Coleshill Flats at lower ground floor; refurbishment and relocation of the Arnrid Johnston obelisk to Five Fields Row; refurbishment and relocation of the water

Gerald Eve LLP is a limited liability partnership registered in England and Wales (registered number OC339470) and is regulated by RICS.
The term partner is used to refer to a member of Gerald Eve LLP or an employee or consultant with equivalent standing and qualifications.
A list of members and non-members who are designated as partners is open to inspection at our registered office; 72 Welbeck Street, London W1G 0AY and on our website.

fountain on Avery Farm Row; repair and relocation of telephone boxes on Orange Square; and other associated works in connection with comprehensive residential-led mixed-use development."

These applications have been brought forward following early dialogue with Westminster City Council (WCC), including with senior officers within the Department of Place Shaping and Town Planning to establish key principles and criteria for the assessment of the proposed redevelopment of the Site. Detailed pre-application consultations were held with the City of Westminster from April 2019 up to the submission of the applications in May 2020. Consultations and discussions have also been held with the GLA, Historic England and TfL, amongst others. The Proposed Development has evolved over the pre-application period and has been altered to accommodate advice received.

The proposals have also been informed by detailed, extensive and meaningful public engagement, consultation and discussion, spanning over a year and four separate consultations and exhibitions attended by over 700 people. Dialogue, conversation and engagement continued in the periods between exhibitions. Over 2,000 survey responses have been received. The proposals have changed in response to the comments received.

Application Documentation

An Environmental Impact Assessment (EIA) has been formally scoped (ref: 20/00233/EIASCO) and voluntarily carried out in accordance with the 2017 Regulations. This information is set out within the Environmental Statement (ES). In addition, other specialist and technical analysis has been undertaken to help inform the design process and this analysis is submitted in support of the applications in the form of stand-alone documents. The full set of documents submitted with the application comprise the following:

i. Completed planning application and listed building consent form;
ii. Completed community Infrastructure Levy form;
iii. Site location plan and block plan, prepared by DSDHA;
iv. Existing, demolition and proposed floorplans, elevations and sections, prepared by DSDHA;
v. Landscaping drawings, prepared by TLG;
vi. Design and Access Statement, prepared by DSDHA;
vii. Town Planning Statement, prepared by Gerald Eve LLP;
viii. Transport Assessment (including Framework Construction Logistics Plan and Framework Deliveries and Servicing Plan, and Travel Plan), prepared by Momentum;
ix. Energy and Whole Life Carbon Assessment, prepared by Cundall;
x. Statement of Community Involvement, prepared by the Applicant;
xi. Affordable Housing Statement, prepared by Quod
xii. Financial Viability Assessment, prepared by Quod;
xiii. Signed Appendix A – Code of Construction Practice, prepared by the Applicant;
xiv. Ventilation and Extraction Statement, prepared by Cundall;
xv. Economic Statement, prepared by Turley;
xvi. Flood Risk Assessment and Sustainable Drainage Strategy Report (including GLA SUDS proforma), prepared by HTS;
xvii. Historic Buildings Report, prepared by DIA;
xviii. Conditions Survey and Method Statement, prepared by DIA;
xix. Structural Methodology Statement, prepared by HTS;
xx. Daylight & Sunlight – Impact on Neighbouring Properties Report, prepared by GIA;

xxi. Daylight & Sunlight – Internal Daylight, Sunlight and Overshadowing Report, prepared by GIA;
xxii. Noise and Vibration Assessment, prepared by Cundall;
xxiii. Fire Strategy Report, prepared by JGA;
xxiv. Arboricultural Report, prepared by TMA;
xxv. Environmental Impact Assessment:
    i. Volume 1 – Main assessment, prepared by Avison Young / DSDHA / Todd Longstaff-Gowan / Cundall / Heyne Tillett Steel / Gardiner & Theobald / Turley / DIA / MOLA / Momentum / RDWI / GIA;
    ii. Volume 2 – Townscape, Visual and above Ground Heritage Setting Effects, prepared by Tavernor Consultancy / Miller Hare;
    iii. Volume 3 – Appendices, prepared by Avison Young/ DSDHA / Todd Longstaff-Gowan / Cundall / Heyne Tillett Stell / Gardiner & Theobald / Turley / DIA/ MOLA / Momentum/ RDWI / GIA / Tavernor Consultancy / Miller Hare; and
    iv. Volume 4 – Non Technical Summary, collated by Avison Young.

The Applicant will make a payment of £88,799 to cover the fee to the application for full planning permission, which includes the application fee of £88,774 and the service charge of £25. This has been calculated based on an uplift in non-residential floorspace of 15,832 sqm GEA post-demolition and 200 new residential units.

The Applicant agrees to enter into a Planning Performance Agreement, and this will be progressed separately to the application submission in line with the usual procedure.

The red line on the site location plan includes all land and buildings falling within the application site to which this planning application relates. Due to the complexity and scale of the Applicant's interests in the wider area around the Site, it is not possible to provide a blue line to demonstrate Applicant's ownership interests on a property by property basis on the site location plan. Should information regarding the Applicant's ownership of neighbouring land be considered of material importance this can be indicated during the determination period.

Site and Surroundings

The Site comprises the land and buildings bounded by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street, and Orange Square and Ebury Square. Specifically, the buildings and structures within the Site include:

i. Flats 1-27, Kylestrome House, Cundy Street, Belgravia, London, SW1W 9JT;
ii. Flats 1-27, Lochmore House, Cundy Street, Belgravia, London, SW1W 9JX;
iii. Flats 1-30, Laxford House, Cundy Street, Belgravia, London, SW1W 9JU;
iv. Flats 1-27, Stack House, Cundy Street, Belgravia, London, SW1W 9JS;
v. Walden House, Pimlico Road, Belgravia, London, SW1W 8LH;
vi. Lower ground floor and partial ground floor only at Coleshill Flats, Pimlico Road, London, SW1W 8LJ;
vii. Lower ground floor only at Coleshill Flats, Ebury Street, London, SW1W 8UT;
viii. Coleshill Car Park;
ix. Arnid Johnston obelisk, rear of Walden House, Pimlico Road, London, SW1W 8LH;
x. Fountain on east side of Junction with Avery Farm Row, Pimlico Road, SW1;
xi. Ebury Square Gardens, Ebury Square, SW1W 9QJ; and
xii. Orange Square (including two listed telephone kiosks), Belgravia, London.

The four cruciform buildings, which make up the majority of the Ste are Kylestrome House, Lochmore House, Laxford House and Stack House. The buildings are arranged at a 45º angle to the surrounding streets and are centred around a circular driveway with associated car parking, accessed from Ebury Street and Cundy Street. The four buildings are 7 storeys and were constructed in the 1950s. The buildings are residential (Class C3) use and provide 111 residential units as one, two and three bedroom flats. There is no public access through this part of the Site.

Walden House is located to the north east corner, at the intersection of Ebury Square and Avery Farm Row. The building is 5 storeys and was constructed in 1924. Its northwest façade adjoins Laxford House. The building provides residential accommodation with 40 social rented flats.

The footprint of the two Coleshill buildings are within in the red line of the application boundary and are both Grade II listed. The Coleshill buildings provide 120 residential units (Class C3), and at ground floor level retail (Class A1) and restaurant (Class A3) use. However, the application only relates to the basement of the Coleshill Flats. The Coleshill Flats, Pimlico Road comprises 6 storeys and is 12 bays wide and were constructed in the 1870s by the Peabody Trust. Whilst the Coleshill Flats, Ebury Road comprise 6 storeys and is 8 bays wide and were constructed in 1871.

The Arnrid Johnston Obelisk is located in the courtyard of Walden House. The obelisk was constructed in 1930 of Portland stone and features relief carving of children playing. The statue is grade II listed.

The Fountain on the East Side of Junction with Avery Farm Row is grade II listed. The fountain was constructed circa 1870, of Portland stone, granite base in Italian Renaissance style. A pair of K6 telephone kiosks located within Orange Square on the Island side at junction with Ebury Street are also Grade II listed.

There are two areas of open space located on the Site: Ebury Square to the north and Orange Square to the South. Ebury Square is a rectangular open space, which retains its historic dimensions. Its perimeter is lined with mature London Plane trees which relate to the significant scale of buildings around it.

Orange Square is a triangular open space at the southern tip of the Site, where Ebury Street joins Pimlico Road. Originally occupied by a small orchard and market garden, shown in Rocque's 1746 map. Orange Square is used as a Farmers Market between 0730 and 1500 on Saturdays.

The majority of the application site is not within a conservation area. However, the Coleshill Flats and Orange Square are located at the southern section of the Belgravia Conservation Area. Both the Pimlico and Peabody Avenue Conservation Areas are located in proximity to the Site, to the south east.

The Site is located within an Area of Special Archaeological Priority, the Crossrail 2 Safeguarding Zone and an area of public playground deficiency. Part of the Site is located within the public open space deficiency, and the Coleshill Flats form part of the Pimlico Road Local Shopping Centre.

The Site has an excellent level of transport accessibility with a PTAL rating of 6b on a scale where 1a is poor and 6b is excellent.

Proposals

The planning application seeks to demolish five existing buildings and replace them with a new development, designed by DSDHA Architects, of the highest environmental and architectural quality.

The Proposed Development will provide a residential-led, mixed use development, arranged in three principal buildings around new routes, gardens and public space. It seeks to reinstate traditional building lines and routes through the Site that existed before the 1950s development.

Building A, on Cundy Street and Ebury Street, will provide housing for older people. It is envisaged that a mix of apartments and rooms for more dependent care will be provided, alongside extensive communal facilities.

Whilst the drawings within this application indicatively show one possible configuration of the accommodation in Building A, this application seeks flexibility on the mix of accommodation to be provided in Building A. A range of potential options have therefore been assessed within this application. The applicant proposes that, if planning permission is granted, details of the actual proposed mix of accommodation in this building will be submitted to, and approved by, the City Council before work on that phase starts. This is described in detail in the Planning Statement.

Building B, on Pimlico Road and Orange Square, will provide affordable and market housing. Building C, on Ebury Street, will provide additional affordable housing.

At ground floor level, a range of new uses will be provided, arranged along a new route connecting Orange Square to Ebury Square. This will include retail, cafes, restaurants, bars, a small new food store, cinema and community space. The ground floor uses will contribute to promoting the activity and viability of the Pimlico Road local centre.

Planning permission is also sought for significant public realm improvements to Ebury Square, including the creation of a new playground. Orange Square will also be improved.

The proposed development is of the highest standards of sustainable design, leading to carbon reductions significantly in excess of those sought onsite by current policy. The architecture is of the highest standard. It will not have an adverse effect on nearby heritage assets and designated heritage assets and will, in many views, improve local townscape quality.

The proposed mix of uses on the Site will retain, and strengthen, the existing social and demographic mix, whilst almost doubling the number of affordable housing units. The proposals will also lead to all the existing affordable homes currently on site being replaced in an equivalent tenure but at modern standards of space and design. Additional affordable housing will be provided. Overall, 47% of the new homes will be affordable.[1] This is the maximum that the proposal can provide.

The proposals will provide a much-needed source of specialist accommodation for older people, accommodating local needs whilst allowing residents to continue to live in the local area.

The proposed development will provide significant public benefits. These include:

i. New market and affordable homes and homes for older people with a range of unit sizes;
ii. A substantial increase in the overall number of homes on the site;
iii. 93 affordable homes, equivalent to 47%[1];
iv. Replacing the existing affordable homes with new affordable homes that are up to 50% larger;
v. Housing designed to meet current standards both in terms of design and energy;

[1] 47% of the habitable rooms, and units, not including Class C2-type assisted living accommodation within Building A.

vi. New shops and amenities including a small food store, restaurants and drinking establishments;
vii. Other uses which were identified by the local community, including a cinema and community space;
viii. New publicly accessible routes through the site;
ix. Additional 139 newly planted trees, alongside enhanced planting and greening;
x. 5,970 sqm of green space and 2,500 sqm of green roofs;
xi. Public Realm improvements to Ebury Square including a new children's play area as well as improvements to Orange Square;
xii. Up to 260 new jobs once the Proposed Development is complete as well as jobs during the construction period;
xiii. £430,000 extra Business Rates payable to the City Council annually;
xiv. Additional spend of up to approximately £2.2million from the additional residents of the development on annual retail and leisure expenditure
xv. Use of significantly less carbon per square metre when considered over a standard 60-year life cycle;
xvi. Exemplary new architecture and townscape improvements;
xvii. 459 new cycle parking spaces;
xviii. Refurbishment of the Grade II listed obelisk, water fountain and K6 telephone boxes;
xix. c. £20m Community Infrastructure Levy contribution.

The Planning Statement and Design and Access Statement demonstrated that the proposals accord with the relevant policies and objective of the NPPF, the London Plan and the City Plan.

In accordance with Article 15(3) of the Town and County Planning (Development Management Procedure) (England) Order 2015, we request that the City Council gives requisite notice as follows:

I. by site display in at least one place on or near the land to which the application relates for not less than 21 days; and
II. by publication of the notice in a newspaper circulating in the locality in which the land to which the application relates is situated.

Please indicate that the application will be available on the City of Westminster website under the relevant reference number and that copies of all the application submission documents can, additionally, be viewed on the project website at www.cundystreetquarter.com.

Following recent updates to the Town and County Planning (Development Management Procedure) (England) Order 2015 to provide alternative arrangements during the current public health crisis, we also request that the Article 15 notice is published on the City of Westminster's website in accordance with Article 15(7B).[2]

We also note that Regulation 19(3) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has also been updated to allow the Secretary of State to be supplied with an electronic copy of the Environmental Statement by sending him a link to the City Council's website, rather than sending a hard copy. We would ask that that a link to the relevant web-page be sent to the Secretary of State to satisfy the requirements of Regulation 19.

On receipt of a validation notice, the applicant will additionally email local consultees and residents who have agreed to be contacted, and post on social media, details of the fact that the application has been submitted and that the application documents will be online both at the City of

[2] The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020

Westminster's website, citing the reference number, and at www.cundystreetquarter.com, including details of alternative arrangements for viewing the application and Environmental Statement.

We look forward to confirmation of validation shortly. If you have any queries, please contact James Wickham (020 7333 6353) or Gary Brook (020 7333 6311) of this office.

Yours faithfully

Gerald Eve LLP

Gerald Eve LLP

jwickham@geraldeve.com
Direct tel. +44 (0)20 7333 6353
Mobile +44 (0)7949 484580

Encs. As above (by Planning Portal)

Cc M Mason Esq – Westminster City Council
F Evans Esq – Grosvenor
D Semple Esq – Grosvenor
Ms O Willsher – Grosvenor
Ms D Saunt - DSDHA
R Mumford Esq – Gardiner & Theobold