

Cundy Street Quarter

Planning Statement

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May 2020



GROSVENOR

Town Planning Statement

Development site bound by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street

On behalf of: Grosvenor Estate Belgravia

May 2020

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1. Executive Summary

- 1.1 Grosvenor Estate Belgravia ('the Applicant') is seeking planning permission and listed building consent for the comprehensive redevelopment of the site known as the Cundy Street Quarter, which is land bound by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street ('the Site').
- 1.2 The majority of the Site is currently occupied by five residential buildings, four constructed in the 1950s and one in the inter-war period. The Site is not densely occupied, and the ground floor is dominated by car parking. There is no public access through the Site and parts suffer from anti-social behaviour. The existing 1950s cruciform buildings were constructed following extensive bomb damage to the previous buildings during the Second World War.
- 1.3 The planning application seeks to demolish all five existing buildings and replace them with a new development, designed by DSDHA Architects, of the highest environmental and architectural quality and commensurate with the location.
- 1.4 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.
- 1.5 Building A, on Cundy Street and Ebury Street, will provide housing for older people, in a mix of different accommodation types to cater for varying care needs. The mix and composition of this building is not yet finalised and so this planning application tests, and seeks approval, for a range of accommodation types in this building. It is envisaged that a mix of apartments and rooms for more dependent care will be provided, alongside extensive communal facilities.
- 1.6 Building B, on Pimlico Road and Avery Farm Row, will provide affordable and market housing. Building C, on Ebury Street, will provide additional affordable housing.
- 1.7 At ground floor level, a range of new uses will be provided, arranged along a new route connecting Orange Square to Ebury Square, which will be called Elizabeth Place. This

will include retail, restaurant/cafes, drinking establishments, a small new food store, cinema and community space.

- 1.8 One basement level and a partial sub-basement are proposed, providing servicing, car parking and other facilities.
- 1.9 Planning permission is also sought for significant public realm improvements to Ebury Square, including the creation of a new playground and Orange Square will be improved. New public space will also be provided at Elizabeth Place Gardens.
- 1.10 Listed building consent is sought for those works affecting the Coleshill Flats, and for the connection of Buildings A and C to the retained Grade II Coleshill Flats. Listed building consent is also sought to refurbish and relocate the obelisk currently in the courtyard of Walden House to an alternative location in Five Fields Row, refurbish and relocate the Marquess of Westminster Memorial Fountain on Avery Farm Row and to relocate the two telephone boxes on Orange Square.
- 1.11 This Planning Statement assesses the Proposed Development against relevant development plan policy, based upon the conclusions of the technical studies carried out forming part of the application and the contents of the Environmental Statement that also forms part of the application.
- 1.12 The principle of demolition and comprehensive redevelopment for residential-led purposes, including older people's housing, is supported by strategic and local policy.
- 1.13 The Proposed Development is of the highest standards of sustainable design, leading to carbon reduction significantly in excess of those sought on-site 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 some views, improve local townscape quality.
- 1.14 The proposed mix of uses on the Site will retain, and strengthen, the existing social and demographic mix. 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 also be provided. Overall, 47% of the new

homes created will be affordable.¹ This is the maximum that the proposal can reasonably provide.

- 1.15 The proposals will provide a much-needed source of specialist accommodation for older people, accommodating local needs whilst allowing residents local to the Site to continue to live in the area. This would also lead to the release of family sized housing in the area.
- 1.16 The ground floor uses will contribute to promoting the activity and viability of the Pimlico Road local centre.
- 1.17 The Proposed Development will not have unacceptable adverse impacts on the amenity, overlooking, sunlight or daylight of nearby occupiers. The proposed configuration of the accommodation will ensure that future occupants will receive an appropriate level of sunlight and daylight. Significant adverse effects on local amenity have been avoided.
- 1.18 The proposal can be accommodated within the local transport network and is accompanied by proposals for changes to improve connectivity, pedestrian access and local environmental quality.
- 1.19 The proposals have 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. The changes include the reduction in the massing of Building B overlooking Ebury Square, the inclusion of a food store (Class A1) and a cinema, and a reduction in retail on Ebury Street.
- 1.20 Furthermore, following feedback received during the consultation period, the Applicant has committed to rehousing the Walden House residents on-site. All City Council residents in Walden House will therefore have a “Right to Return” to new social rented homes on site. The Proposed Development would be phased to ensure that residents currently living within Walden House will be able to move flat only once, directly in to the new and improved

¹ 47% of habitable rooms in Class C3 residential accommodation and independent living accommodation within Building A

accommodation at Building C, or to a suitable alternative within the Council's portfolio elsewhere in the city, with an option to return when the redevelopment is complete.

1.21 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%²;
- 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;
- 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 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;

² 47% of the habitable rooms, and units, not including Class C2-type assisted living accommodation within Building A.

- 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.

1.22 Overall, this Statement concludes that the Proposed Development complies with relevant development plan policy and that planning permission, and associated listed building consent, should be granted accordingly.

2. Introduction

2.1 This Planning Statement is submitted in support of an application for full planning permission and listed building consent made on behalf of Grosvenor Estate Belgravia, ('the Applicant') for Proposed Development at land bound by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street ('the Site'). This Statement sets out the planning case in support of the applications. It summarises the planning history of the Site and assesses the Proposed Development in the context of relevant policies and guidance.

2.2 The proposals are described in greater detail in Section 5.0 of this Statement. In summary, planning permission is sought for the following ("the Proposed Development"):

"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 Arnridd 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."

2.3 Listed building consent is 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 Arnridd Johnston obelisk to Five Fields Row; refurbishment and relocation of the water 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.”

2.4 This Statement is structured as follows:

- i. A description of the Site and surroundings in Section 3;
- ii. Details of the Site’s planning history in Section 4;
- iii. Details of the Proposed Development in Section 5;
- iv. Consultation Summary in Section 6;
- v. Planning policy framework is summarised in Section 7;
Planning Considerations:
- vi. Principle of Development in Section 8;
- vii. Sustainability and energy in Section 9;
- viii. Townscape, views and heritage in Section 10;
- ix. Design and layout in Section 11;
- x. Land use in Section 12;
- xi. Retail planning matters, including a sequential and impact assessment, in Section 13;
- xii. Residential Design in Section 14;
- xiii. Public realm and landscaping in Section 15;
- xiv. Daylight, sunlight and overshadowing in Section 16;
- xv. Transport and servicing in Section 17;
- xvi. Other technical considerations in Section 18;
- xvii. CIL and draft S106 Obligations in Section 19; and
- xviii. Conclusions in Section 20.

2.5 The Proposed Development, designed by DSDHA, is summarised in Section 5 of this Statement. This Statement should be read in conjunction with the application plans submitted in support of these applications and the Design and Access Statement.

2.6 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. To avoid unnecessary duplication, the Planning Statement cross refers to

relevant sections on the ES and other documents but does not repeat what is said there.
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. Design and Access Statement, prepared by DSDHA;
- vi. Town Planning Statement, prepared by Gerald Eve LLP;
- vii. Transport Assessment (including Framework Construction Logistics Plan and Framework Deliveries and Servicing Plan, and Travel Plan), prepared by Momentum;
- viii. Energy Assessment, prepared by Cundall;
- ix. Statement of Community Involvement, prepared by the Applicant;
- x. Affordable Housing Statement, prepared by Quod
- xi. Financial Viability Assessment, prepared by Quod;
- xii. Signed Appendix A – Code of Construction Practice, prepared by the Applicant;
- xiii. Ventilation and Extraction Statement, prepared by Cundall;
- xiv. Economic Statement, prepared by Turley;
- xv. Flood Risk Assessment and Sustainable Drainage Strategy Report (including GLA SUDS proforma), prepared by HTS;
- xvi. Historic Buildings Report, prepared by DIA;
- xvii. Conditions Survey and Method Statement, prepared by DIA;
- xviii. Structural Methodology Statement, prepared by HTS;
- xix. Daylight & Sunlight – Impact on Neighbouring Properties Report, prepared by GIA;
- xx. Daylight & Sunlight – Internal Daylight, Sunlight and Overshadowing Report, prepared by GIA;
- xxi. Noise and Vibration Assessment, prepared by Cundall;
- xxii. Fire Strategy Report, prepared by JGA;
- xxiii. Arboricultural Report, prepared by TMA;
- xxiv. 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.

2.7 These applications have been brought forward following early dialogue with Westminster City Council (the City Council), 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 Council 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, TfL, amongst others. The Proposed Development has evolved over the pre-application period and has been altered to accommodate advice received.

2.8 This Statement sets out a planning assessment of the Proposed Development against development plan policies and other material considerations. The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act (2004) comprises: the London Plan (adopted March 2016); and the Westminster City Plan (adopted November 2016). Although not formally adopted, the Intend to Publish London Plan policies are also relevant to this development and in view of the stage they have reached should be treated as having significant weight in the determination of planning applications. Where necessary we have also had regard to the draft City Plan 2019-2040, which only holds little weight at this stage given its relatively early stage.

2.9 Guidance within the National Planning Policy Framework (2019) is also a material consideration against which the proposals have been considered.

2.10 The Applicant is the Grosvenor Estate Belgravia, which is a long-term landowner in the area. Grosvenor develops, manages and invests in property in more than 60 cities around the world. The Applicant seeks to improve property and places to deliver lasting

commercial and social benefit. This is achieved by adopting a far-sighted approach, being locally engaged and sharing international experience.

- 2.11 The Proposed Development seeks to provide a residential-led, mixed-use development, with erection of three mansion buildings varying in height from 5 to 11 storeys, to provide 93 affordable homes (Class C3), which is up to 47% by habitable rooms³, up to 119 assisted living units, between 23 and 91 independent living units, and 70 market homes (Class C3). A range of flexible uses will be provided at ground floor level including community space (Class D1), cinema (Class D2), retail (Class A1), restaurant / café (Class A3) and drinking establishments (Class A4). The senior living accommodation, described in more detail in Section 5, will not sit entirely within a single conventional use class. Retail and / or workspace (Class A1 and / or Class B1), is proposed at basement level of the Grade II listed Coleshill Flats, subject to vacant possession of that part of the buildings. The Grade II listed Arnrid Johnston obelisk will be relocated to Five Fields Row and the Grade II listed Fountain on the east side of Avery Farm Row will be relocated to the west side, in a more prominent position. The Grade II listed telephone boxes on Orange Square will be dismantled to allow the construction works to take place and then be positioned in a marginally different location. They would also be repaired as the door of one kiosk would be replaced and the glazing of the southern kiosk would be replaced, whilst both would be repainted.
- 2.12 New pedestrian routes will be introduced to provide increased permeability north-south via Elizabeth Place and east-west via Five Fields Row and Clifford's Row. Public realm will be introduced at ground level at Elizabeth Place Gardens, adjacent to Buildings A, B and C, level 1-2 of Building A, level 1 of Building B and level 1, level 4 and level 7 of Building C, which will form accessible roof terraces for occupiers. New play facilities will be provided at the roof level of Buildings B and C and within Ebury Square.
- 2.13 In total the planning and listed building consent application seeks to provide 23,092sqm sqm (GIA) of residential floorspace (Class C3), 18,345 sqm (GIA) of senior living accommodation, 883 sqm (GIA) of retail (Class A1) floorspace, 1,952 sqm (GIA) of Retail

³ That is, 47% of the habitable rooms in the Class C2 residential accommodation and independent living accommodation in Building A

/ Restaurant / Drinking Establishments (Class A1/A3/A4/B1) floorspace, 154 sqm (GIA) of community floorspace and 846 sqm (GIA) of cinema (Class D2) floorspace.⁴

- 2.14 For the reasons set out in this Planning Statement, we consider that the Proposed Development is in accordance with the development plan and guidance and should be granted planning permission and listed building consent accordingly.

⁴ Throughout this Statement, unless otherwise specified, the areas reported do not include basement car parking, servicing and refuse storage, in line with the City Council's definition.

3. Site and Surroundings

- 3.1 The Site is located in the City of Westminster in the northern part of the Churchill Ward. The Royal Borough of Kensington and Chelsea is located approximately 250m to the west of the Site. The Site comprises an area of 1.77 ha.
- 3.2 The Site comprises the land and buildings bounded by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street. It also includes 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. Arnrid 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;
 - xii. Orange Square, Belgravia, London (including telephone boxes).
- 3.3 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 Grosvenor's interests in the wider area around the Site, it is not possible to provide a blue line to demonstrate Grosvenor'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.
- 3.4 The four cruciform buildings, which make up the largest part of the Site are Kylestrome House, Lochmore House, Laxford House and Stack House. The buildings are arranged at a 45° 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 in height and were constructed in the 1950s. The buildings have a residential (Class C3) use and provide 111 private residential units as one, two and three bedroom flats. There is no public access through this part of the Site.

- 3.5 Walden House is located to the north east corner of the Site, at the intersection of Ebury Square and Avery Farm Row. The building is 5 storeys in height and was constructed in 1924. Its northwest façade adjoins Laxford House. The building provides residential accommodation with 40 flats (Class C3) which are currently leased to the City Council and used for social housing. Walden House provides outdated, and small accommodation which does not meet modern size standards. There are currently 40 units within 2,835sqm of GIA floorspace, resulting in an average unit size of 71 sqm **before** allowing for circulation space. The existing accommodation within Walden House has no private or shared outdoor amenity space and has limited facilities for waste and cycle storage, and no lift access. The accommodation is therefore below modern standards.
- 3.6 The lease of Walden House to the City Council expires in 2021 (which was subsequently extended by the Applicant until 2023). The City Council can, in the context of the redevelopment proposals, extend the lease further to allow the existing Walden House residents move directly into completed replacement social housing on part of the site. There is no legal restriction requiring the ongoing use of Walden House for affordable housing.
- 3.7 The footprint of the two Coleshill Flats buildings is within the red line of the application boundary and are both Grade II listed. The Coleshill Flats provide 120 residential units (Class C3), and at ground floor level retail (Class A1) and restaurant (Class A3) uses. However, the application only relates to the basements of the Coleshill Flats and the side and rear facades. The Coleshill Flats, Pimlico Road comprises 6 storeys and is 12 bays wide and was constructed in the 1870s by the IIDC. Whilst the Coleshill Flats, Ebury Street comprise 6 storeys and is 8 bays wide and was constructed in 1871 also by the IIDC. The basements of the two Coleshill Flats provide a total of 9 affordable residential units, including 5 intermediate units and 4 social rented units.
- 3.8 In summary, the existing floorspace of the Site is set out in table 3.1 below:

Land Use	Area sqm (GIA)
Market Housing (Class C3)	9,058 sqm
Affordable Housing (Class C3)	3,283 sqm
Retail (Class A1)	50 sqm
Total	12,391 sqm

Table 3.1 – Existing floorspace

3.9 Table 3.2 shows the existing residential unit mix by tenure:

	1 bed	2 bed	3 bed	4 bed	Total
Number of market units	26	57	28	0	111
Number of intermediate units	4	1	0	0	5
Number of social rent units	2	17	20	5	44
Total	32	75	48	5	160

Table 3.2 – Existing residential units, by tenure

3.10 The Coleshill Flats are Grade II listed for the following principal reasons as set out in the listing description:

“Historic interest: the building is an example of public housing built by one of the early public housing organisations, which sought to provide improved living conditions for the urban poor. Architectural interest: the building is a handsome and externally well-preserved example of its type, which demonstrates the intention of the IIDC to provide light, well

ventilated, and well constructed accommodation for its tenants. The open stair wells and iron-fronted access balconies are standard features of IIDC housing.” [List UID: 1265626 and 1357008]

- 3.11 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 for the following principal reasons as set out in the listing description:

“Architectural Interest:

*for the finely composed relief carvings of children at play to the three faces of the obelisk, with stylised figures expressively arranged and the sculptural work, despite its weathering, evidently well executed; * as the most significant surviving sculptural work by Arnrid Johnston, a renowned artist of the mid-C20; initially associated with the influential ‘English Independents’ group of sculptors and later a prominent illustrator and designer.*

Historic Interest:

as a significant and celebrated piece of site-specific civic art of the inter-war period, commissioned by the Duke of Westminster for the playground courtyard of a council housing block reserved for families with young children.” [List UID: 1459927]

- 3.12 The Fountain on the east side of the Pimlico Road and Avery Farm Row junction is Grade II listed. The fountain was constructed in circa 1870, of Portland stone and a granite base in an 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.
- 3.13 A Certificate of Immunity from listing (ref: 1416865) was issued between the 31 October 2013 and 30 October 2018 under the Planning (Listed Buildings and Conservation Area) Act 1990 for Kylestrome House, Lochmore House, Laxford House and Stack House. The Certificate of Immunity was subsequently renewed on the 16 May 2018 and expires on the 15 May 2023.
- 3.14 For Walden House, a Certificate of Immunity from listing (ref: 1460555) was also issued for the period between the 19 November 2018 and 18 November 2023 under the Planning (Listed Buildings and Conservation Areas) Act 1990.

3.15 Other listed buildings in proximity to the Site are:

- i. Church of St Barnabas (Grade I listed);
- ii. St Barnabas Church School (Grade II listed);
- iii. Pimlico (St Barnabas) War Memorial (Grade II listed);
- iv. St Barnabas Parsonage and Gateway to North (Grade II listed);
- v. The Orange Public House (Grade II listed);
- vi. 162-170 Ebury Square (Grade II listed);
- vii. 172 Ebury Street (Grade II listed);
- viii. 174 Ebury Square (Grade II listed);
- ix. 180 Ebury Square (Grade I listed);
 - i. 182 Ebury Square (Grade II listed);
 - ii. 184-188 Ebury Street (Grade II listed);
- iii. British Airways Terminal (Grade II listed);
- iv. Victoria Coach Station (Grade II listed);
- v. No 20-42 (Even) Ebury Bridge Road (Grade II listed).

3.16 There are 97 trees and 1 shrub of varying species and condition on-site. There are 15 trees within the Cundy Street element of the site which are covered by a Tree Protection Order (TPO No. 653). There are also 14 trees covered by TPO 657 which include 13 mature plane trees and one hawthorn tree and these are all located in Ebury Square.

3.17 There are two areas of open space located on the Site: Ebury Square Gardens 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.

3.18 Orange Square is a triangular open space at the southern tip of the Site, where Ebury Street joins Pimlico Road. It was originally occupied by a small orchard and market garden, shown in Rocque's 1746 map. The Orange Brewery public house, which still exists today, was built on the opposite side of Queen Street in 1846 and it is presumably from this pub that the Square takes its name. Orange Square is used as a popular Farmers Market between 0730 and 1500 on Saturdays.

3.19 Access to the Site is gained via Cundy Street, Ebury Street, Pimlico Road and Orange Square. Deliveries and servicing, including waste collection take place from Cundy Street and on-street from the surrounding highway network. The waste collection for the Coleshill

Flats takes place from the entrance to the Coleshill car park on Orange Square. The existing Site has a total of 83 car parking spaces, this includes 59 car parking spaces associated with the Cundy Street Flats and 24 spaces located in the Coleshill Car Park.

- 3.20 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. This rating is due to the proximity of Victoria National Rail and London Underground train station. Sloane Square is also located in proximity to the Site, serving the circle and district line. A total of approximately 90 buses serve the Site during the AM peak hour and 87 buses during the PM peak hour. There are also TFL Cycle Hire docking stations in proximity to the Site including on Bourne Street, which accommodates 15 bicycles, and Elizabeth Bridge, which provides 33 bicycles spaces.
- 3.21 The Site is located just outside the Core Central Activities Zone and the Victoria Opportunity Area. The CAZ and Opportunity Area borders the northern and eastern side of Ebury Square. 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 within the GLA CAZ.
- 3.22 The Site is located within Tier 3 of the Pimlico Special Archaeological Priority Area, the Crossrail 2 Safeguarding Zone (part) and an area of public play space deficiency. Part of the Site is located within an area of public open space deficiency, and the Coleshill Flats form part of the Pimlico Road Local Shopping Centre. The Site is within Flood Zone 1, land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding.

4. Planning History

- 4.1 An examination of the City Council's Planning Register has been carried out. A summary of the relevant planning history records is outlined in this section. A full summary table of the planning history of the Site is detailed in Appendix A.

'Island site' bounded by Cundy Street, Ebury Street, Pimlico Road

- 4.2 On 10 March 1949, planning permission (ref: T.P.6a 2740) was granted for the following:

"In principle, the redevelopment of the island site bounded by Cundy Street, Ebury Street and Pimlico Road, Westminster by the erection of blocks of flats as shown on schemes A and b."

- 4.3 Following this, a planning application (ref: T.P.6a 4986) was submitted on 3 June 1949 and granted (no date) for the following:

"Approval to detailed drawings submitted of the proposed building relating to the redevelopment of the island site bounded by Cundy Street, Ebury Street and Pimlico Road, Westminster, by the erection of blocks of flats and the provision of a shop on the ground floor of Block No.4."

- 4.4 On the 7 September, planning permission (ref: T.P.6a 50/685) was granted for the laying of serving roads:

"The laying out of service roads and access thereto as indicated upon the plans submitted, as a deviation from the plans, already approved in respect of the redevelopment of the island site bounded by Cundy Street, Ebury Street and Pimlico Road, Westminster by the erection of block of flats."

- 4.5 It is understood that these permissions are in relation to the cruciform buildings which currently stand at the Site.

Laxford House

- 4.6 On 29 December 1966, planning permission (ref: TP/4862) was granted for the following:

“The conversion of the ground floor recreational room and ancillary accommodation at Laxford House, Cundy Street, S.W.1 into a two-room self-contained residential flat.”

- 4.7 On 10 May 2011, planning permission (ref: 10/07869/FULL) was granted for the following:

“Erection of two storey extension at roof level to the annexe of Laxford House adjoining Walden House to accommodate four residential units.”

- 4.8 Since that time there have been subsequent minor planning applications for alterations to Lochmore House, Kylestrome House, Stack House and Walden House, however there are no significant applications which are considered relevant to the development of the Site.

Coleshill Flats, 20-30 Pimlico Road

- 4.9 The Coleshill Flats, 20-30 Pimlico Road is a six storey building constructed in the 1870s. On the 8 October 1970, planning permission (ref: TP.4862) was granted for the following:

“The erection of an extension to each of the top floor flats at Nos. 22, 44, 66, 109, 110 Coleshill Buildings, Pimlico Road, S.W.1.”

- 4.10 Since that time there have been subsequent minor planning and listed building consent applications for alterations to the Coleshill Flats, 20-30 Pimlico Road, however there are no significant applications which are considered relevant to the change of use and minor alterations proposed at the lower ground floor.

Orange Square

- 4.11 On 1 November 2018, planning permission (ref: 18/06344/FULL) was granted for the following:

“Use of the open space between Ebury Street and Pimlico Road as weekly Saturday farmers’ market with servicing hours from 7.30am-3pm and trading hours from 9am-2.05pm.”

- 4.12 This permission is personal to London Farmers' Markets Ltd and expires on the 31 October 2023. The Proposed Development seeks to ensure that this market will be able to carry on its successful operation whilst a permission remains in place.

Ebury Square

- 4.13 On 14 October 2013, planning permission was granted (ref: 13/08310/FULL) for the following:

“Works to boundaries of Ebury Square Gardens comprising installation of new wrought iron gate on western boundary and replacement and widening of two existing gates on eastern and western boundaries.”

- 4.14 On 30 July 2014, planning permission (ref: 14/00536/FULL) was granted for the ‘installation of a new lighting scheme to Ebury Square Gardens’.

Marquess of Westminster Memorial Fountain, Avery Farm Row

- 4.15 The fountain on the east side of junction with Avery Farm Row is Grade II listed. On the 31 January 2018, listed building consent (ref: 17/111/42/COLBC) was granted for the following:

“Repairs to the substructure of the fountain (Marquess of Westminster Memorial Fountain) and surrounding paving stones.”

Relevant Planning History of adjacent sites

- 4.16 This section addresses the relevant planning history of neighbouring sites.

Johnson House, Cundy Street

- 4.17 On the 9 March 2012, full planning permission (ref: 11/12058/FULL) was granted for the following:

“Demolition of existing building (60 flats) and construction of two new residential buildings with a total of 71 flats. Building 1 faces Ebury Street and comprises ground plus four storeys. Building 2 faces Ebury Square and comprises ground plus seven storeys. Provision of three basement levels to provide 79 car parking spaces with access from Semley Place. Provision of hard and soft landscaping and alterations to highways including road widening of Ebury Square west section.”

41 Pimlico Road

- 4.18 On the 19 November 2019, a Certificate of Lawfulness of Proposed Use or Development (ref: 19/07400/CLOPUD) was issued for the following:

“Confirmation that development has commenced under planning permission RN:16/04562/FULL, and that the development approved by that permission can continue to be implemented lawfully after 30 November 2019 (Demolition and reconstruction behind a retained front facade of 41, 43, 57, 59 and 63 Pimlico Road including the realignment of the rear elevation, the installation of new roof structures to match the existing, and the creation of external terraces; demolition of 61 Pimlico Road (the element directly fronting onto Pimlico Road) and construction of infill accommodation at ground, first, second and third floors; replacement of shopfronts to 41, 43, 57, 59 and 63 Pimlico Road; retention and sub-division of the builders' yard at 61 Pimlico Road (behind the frontage to Pimlico Road), installation of a partial mezzanine floor and creation of lateral connections at ground floor level to 41, 43, 57 and 59 Pimlico Road; replacement of the builders' yard glazed roof lantern; creation of roof level plant enclosure above part of the builders' yard; creation of 4no. Class A1 retail units at basement, ground and mezzanine level, with 7no. Class C3 residential dwellings at the first, second and third floor levels (with ground floor access); sub-surface excavation including lowering of ground floor slabs and the creation of additional basement accommodation; together with other external alterations).”

- 4.19 The area around the Site is undergoing extensive transformation as a number of major development proposals are brought forward which will change the physical built form and prevailing character of the area. These sites include Chelsea Barracks, Ebury Bridge Estate and Kilmuir House. Whilst the development is largely complete at Chelsea Barracks, the proposals at Ebury Bridge Estate are evolving following a formal scoping opinion received in December 2019. The proposals at Kilmuir House are pending determination.

Development site at Chelsea Barracks

- 4.20 On 15 March 2012, a minor material amendment (ref: 11/12403/OUT) was granted to the planning permission dated 1 December 2011 for the following:

“Variation of Conditions 1, 26 and 53 of planning permission dated 1 December 2011 for 'Demolition of existing former barracks buildings and warehouse (Dove Walk) in connection with the redevelopment of the site for mixed use purposes comprising residential (a maximum of 448 units), sports centre (Class D2), retail (flexible use within Class A1/A2/A3), health centre (Class D1), non-residential institution/leisure uses (flexible use within Classes D1 and/or D2); hard and soft landscaping and open space; reconfigured and new vehicular and pedestrian accesses and works to the public highway; together with all associated works including the construction of basement to provide ancillary vehicular and cycle parking, circulation, servicing and plant areas. Alterations to perimeter railings'. Namely, to allow a minor amendment to the parameter plans of Plots 1 and 2 and a minor extension of the landscaped area of Pimlico Square.”

Ebury Bridge Estate, Ebury Bridge Road

- 4.21 On 7 March 2016, planning permission (ref: 14/01295/COLFUL) was granted by the City Council for the following:

“Demolition of eight existing buildings and construction of four new buildings of between four and 14 storeys to provide 271 new flats (118 x 1 bedroom, 95 x 2 bedroom, 51 x 3 bedroom and 7 x 4 bedrooms) consisting of 129 social rent flats, 26 equity share flats and 116 private/market flats: use of ground/basement floors of Block 1 for Class A1/A2/D1 purposes; a replacement community room and children's playspace; new landscaping and pedestrian route through the site; new basement car park (62 spaces) and 12 surface level parking spaces (one car club space and 11 disabled spaces).”

- 4.22 These permitted proposals have been superseded by revised proposals upon which the Council has consulted recently and to which the EIA Scoping request, below, relates.

- 4.23 On 10 October 2019, prior approval (19/06951/APAD) was permitted for:

“Notification of intention to demolish Wellesley House, Wainwright House, Dalton House, Hillersdon House, Pimlico House and Mercer House (Prior Approval under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).”

- 4.24 Details of a desktop study - full site history and environmental information from the public records pursuant to Condition 1 (Phase 1) of Prior Approval Notification dated 10 October 2019 (RN:19/06951/APAD) were approved on 10 December 2019.
- 4.25 On 6 December 2019, a formal scoping opinion (ref: 19/07372/EIASCO) from the City Council was provided in relation to the redevelopment of Ebury Bridge Estate to provide a residential-led mixed use development comprising the erection of new buildings ranging from 10 to 19 storeys to provide residential units and ancillary residential facilities (Class C3) and retail (Class A1 to A4), community floorspace (Class D1 / D2) and workspace (Class B1), the provision of new publicly accessible open space, new pedestrian and vehicle routes, accesses and amenity area. The subsequent hybrid planning application has not yet been submitted.

Kilmuir House

- 4.26 On 24 February 2020, a planning application for Kilmuir House, Ebury Street (ref: 20/01346/FULL) was submitted and is currently pending determination, for the following:

“Demolition of existing buildings and erection of a lower ground, ground plus 6 storey building with two storey basement and plant at rooftop level to provide residential floorspace (Use Class C3) and flexible retail floorspace (Use Class A1/A2/A3/A4), car parking plus associated landscaping works. (Site includes 60-64 South Eaton Place).”

5. Proposed Development

- 5.1 The Proposed Development seeks to create a new urban quarter at the heart of Belgravia through the provision of a mix of uses, high quality architecture, public realm and landscaping which encourages activity and permeability through the Site.
- 5.2 The development would provide homes (including affordable homes) as well as specialist accommodation for older people, alongside a range of complementary commercial units and community facilities for use by the existing community and new residents.
- 5.3 The design of the development has evolved with consideration of the following key principles:
- i. To design a coherent mixed-use scheme which is more open and inclusive and delivers new homes for a range of people with activated ground floor uses;
 - ii. To create a new attractive destination for the local area with a retail mix which allows residents to reach daily amenities easily;
 - iii. To deliver a new community space;
 - iv. To ensure high architectural quality standards and demonstrate innovative design solutions which respond sensitively to the existing wider heritage and urban framework;
 - v. To achieve the highest possible standards of energy efficiency to reduce carbon emissions and ensure a sustainable new development;
 - vi. To repair the streetscape and create distinct new addresses on Ebury Street, Cundy Street and Pimlico Road;
 - vii. To open up new public routes through the site;
 - viii. To create a catalyst to regenerating Orange and Ebury Squares as active and attractive public spaces.
- 5.4 The driving principle behind the proposals is to create a new development which responds to its unique location and surrounding context, and to create a high-quality environment for residents, workers, visitors, and neighbouring residents through sensitive, contemporary architecture and design.
- 5.5 This section describes the development proposals in greater detail.

Summary

- 5.6 The proposals seek to erect three mansion block buildings varying in height from five to 11 storeys (including ground floor level). Specialist accommodation for older people would be provided in a new building at the corner of Ebury Street and Cundy Street, whilst market housing and affordable housing (Class C3) would be provided in buildings on Pimlico Road and Ebury Street. The ground floor frontages will be activated through the introduction of a range of complementary commercial units including a food retail (Class A1), non-food retail (Class A1), restaurants / cafes (Class A3), drinking establishments (Class A4), a cinema (Class D2) and a community facility (Class D1). The basement level of the Coleshill buildings would be used as affordable retail and / or workspace (Class A1 and / or B1), subject to vacant possession. The proposals will also deliver improved public realm at ground floor level, and at Ebury Square and Orange Square, along with dedicated playspace. New internal pedestrian routes would be introduced as part of the development.

Demolition

- 5.7 The Cundy Street buildings: Kylestrome House, Lochmore House, Laxford House, Stack House and Walden House, and part of the retail unit at 20A Pimlico Road would all be demolished,
- 5.8 Twenty-four of the existing 98 trees would be retained. 74 of the existing trees together with a portion of the vegetation across the Site would be removed.

Layout and Massing

- 5.9 The design development has resulted in a scheme comprising of three buildings, each with a distinct address responding to their immediate context as follows:
1. Building A, located in the approximate north western corner of the Site.
 2. Building B, which consists of Building B1, B2 and B3 located in the eastern corner of the Site;
 3. Building C, located in the western part of the Site.

- 5.10 Building A is a courtyard mansion building fronting Ebury Street and Cundy Street with its primary address on Cundy Street. Building A would comprise a basement element and would be ground floor plus nine storeys in height to its highest point.
- 5.11 Building B is also a courtyard mansion building with addresses on Ebury Square and Pimlico Road. Building B would comprise three stepped blocks, decreasing in massing from the north (Building B1) to the more southern elements of the building along Pimlico Road (Building B2), concluding at its lowest height (Building B3), connecting to the existing Coleshill Flats. The massing of Building B1 would be stepped back from Ebury Square and Avery Farm Road.
- 5.12 Building B would comprise a basement element and would be a maximum of ground floor plus ten storeys in height.
- 5.13 Building C is a compact mansion building, located on the pedestrian connection between Ebury Street and Elizabeth Place known as Five Fields Row. Building C would comprise a shared (with Building A) basement element and would be a maximum of ground floor plus six storeys in height. Although at ground floor level Building C would comprise a single block, at the fourth floor level the massing would divide into two separate blocks, surrounded by a roof terrace, to provide a break in the massing and ensure uninterrupted wider views from Block A.

Internal Routes

- 5.14 New internal routes would be introduced as part of the Proposed Development. These would include Elizabeth Place (located between Building A and B), Five Fields Row (located between Buildings A and C) and Clifford's Row (located between Building B and the existing Coleshill Flats, fronting Pimlico Road).

Ebury Square Gardens, Orange Square and Coleshill Car Park

- 5.15 The current Coleshill car-park, located to the rear of the Coleshill Flats, which is underutilised as a car park and is subject to anti-social behaviour problems, would be reconfigured to provide a through-route between Orange Square and Ebury Square

Gardens. The area would be landscaped to enhance the public space, whilst ensuring privacy is maintained for the existing residences using greenery and planting.

- 5.16 Orange Square and Ebury Square will also be enhanced with additional planting, improving the quality of the public open space, elements of play space and streetscape.

Basements

- 5.17 A site-wide single level basement would be provided beneath the Site, with two isolated sub-basement elements. The Coleshill Flats basements will have new access points from Elizabeth Place Gardens as well as new lift access.
- 5.18 The basement beneath Building A and B would provide car-parking, whilst cycle parking, together with space for adequate refuse facilities and building plant would be provided across the site-wide basement.
- 5.19 Vehicular access to the entire basement would be provided via lifts off Cundy Street and Pimlico Road. In addition, residents of the development would be able to access the basement on foot via each individual building core.

Land Use

- 5.20 In terms of land use, the proposals introduce the following land uses on the site:
- i. Residential accommodation (private, intermediate and social rent) (Class C3);
 - ii. Senior Living accommodation (Class C2 and/or Class C3);
 - iii. Retail uses (Class A1/A3/A4);
 - iv. Community Space (Class D1);
 - v. Cinema (Class D2);
 - vi. Workspace (Class B1 and/or A1).

- 5.21 Each is summarised below.

Residential Accommodation

- 5.22 There are 160 existing residential units on the site. All of which will be demolished under the proposed scheme, with the exception of those at the lower ground floor of the Coleshill

Flats. A total of 163 Class C3 residential units for private and affordable use will be provided. In addition, there will be Senior Living Accommodation which will have a range of different accommodation, of between 91 and 142 (equivalent to 91 traditional residential units). This is described in Section 5.36 below. There will be a material increase in residential unit numbers as a result of the proposals.

- 5.23 The residential accommodation is located within Buildings B and C. Private residential accommodation would be located within Building B1. Intermediate and social rent (affordable) units would be provided within Buildings B2, B3 and C.
- 5.24 The private element, Building B1, has an address on Ebury Square with the intermediate Building B2/3 accessed from Pimlico Road. The social rent entrance to Building C is located on the pedestrian connection between Ebury Street and Elizabeth Place - Five Fields Row, with an entrance also located on Elizabeth Place Gardens.
- 5.25 Building B1 provides a variety of private residential apartment types, from small studios to larger family sized 3-bedroom apartments. Over a third of apartments are family sized. Most larger units benefit from inset balconies and are dual aspect. Apartments are served via two sets of lifts connected directly to the lobby fronting Ebury Square. All apartments have step-free access to a shared podium garden at first floor, a small ground floor courtyard as well as all amenities at ground and basement level.
- 5.26 Buildings B2 and B3 house the Intermediate accommodation. Most of the Intermediate units are one and two bedroom apartments, some with balconies and some with oversized living rooms with Juliette balconies. There are four, double aspect, family sized (3 bed) apartments in Building B3. All apartments are served via two lifts and a stair and all have step-free access to both podium garden as well as to roof terrace garden at fifth floor, where play space for children is located.
- 5.27 Almost half of units in Building C are family sized with 3 bedrooms or more (with the unit mix designed to meet the assessed needs of Walden House residents). All apartments have Juliette balconies and are served via two lifts accessed from separate lobbies. Building C was divided in two to maximise daylight and aspects of the apartments and break down the massing. All apartments have step-free access to a green garden podium / roof terrace at 1 and 4 floor level, and at 7 level where play space for children is provided.

5.28 Table 5.1 below summarises the proposed residential Class C3 provision.

	Studio	1 bed	2 bed	3 bed	4 bed	5 Bed	Total
Number of market units C3	5	5	35	25	0	0	70
Number of intermediate units C3	0	33	12	4	0	0	49
Number of social rent units C3	0	11	13	16	3	1	44
Independent Senior Living units C3 ⁵	2	28	7	0	0	0	37
Total	7	77	67	45	3	1	200
Approx. % of Total	3.5%	38.5%	33.5%	22.5%	1.5%	0.5%	

Table 5.1 - Proposed Residential (Class C3) provision

5.29 The new dwellings will all be larger than the equivalent existing dwellings and will be dual aspect where possible. The homes will be energy efficient and have plenty of daylight.

⁵ As shown in Indicative Design Scheme for Building A

- 5.30 The existing configuration of affordable housing is described in Section 3. In summary, there are 40 social rent units in Walden House, and 4 social rent units and 5 intermediate units in the basement of the Coleshill Flats.
- 5.31 The Proposed Development provides affordable housing in two buildings, Building B2/3 and Building C. Building C will provide 44 social rent equivalent units. Building B2/3 will provide a further 49 Intermediate units. These are proposed to be intermediate rent.
- 5.32 The existing Walden House residents will be offered a one-move “right to return” to replacement accommodation in Building C. This means that Walden House residents will be able to move directly from Walden House into the newly complete accommodation in Building C. The mix of the accommodation in Building C has been developed with the City Council’s housing department to meet the assessed needs of the Walden House residents. The residents of Walden House will have the option to relocate in one move to the completed Building C, which will be built and made ready before the demolition of Walden House. The phasing arrangements are explained in Section 19.
- 5.33 Should planning permission be granted, the residents of the nine Coleshill flats will have the option to remain in the flats on the basis of their current tenancy arrangements or be relocated. This would then allow affordable retail / workspace to be provided, the basis for which is also explained further in Section 19.
- 5.34 The relationship of the proposed affordable housing to the existing is described in Section 12, below.
- 5.35 The new dwellings will all be larger than the equivalent existing and will be dual aspect where possible. The homes will be energy efficient, ensuring that energy usage and bills are reduced, and receive good levels of daylight.

Senior Living Accommodation

- 5.36 The Proposed Development includes a meaningful element of specialist accommodation for older people, referred to as senior living accommodation. The accommodation will occupy all of Building A, a courtyard mansion building with its primary address on Cundy Street.

- 5.37 It is expected that the senior living accommodation will be composed of a mix:
- i. Independent living units - These will be self-contained units, encompassing a bedroom (or, in a few cases, two bedrooms), bathroom and living room / kitchen / diner.
 - ii. Assisted living units - These will be studio-type units. Some may have small kitchenettes but will not be fully self-contained.
- 5.38 The accommodation, including the independent living, would be let only to primary tenants over the age of 65 with care needs, confirmed by an independent assessment. The primary tenant, with care needs, could be accompanied by a spouse or partner. Those living within the assisted living units are likely to have substantially more extensive care needs.
- 5.39 Flexible care will be provided, through to end-of-life, including to residents of the independent living accommodation as their care needs change, who may remain within independent living accommodation but use it in a way that ceases to be self-contained.
- 5.40 The senior living accommodation would include extensive shared amenity, care and support facilities, including exercise, library, dining, treatment, and a shared reception / concierge area serving the whole block. There will be shared amenity facilities, such as a dining room, lounge and spa room on an Assisted Living typical floor.
- 5.41 The proposed senior living accommodation within Building A would comprise a single planning unit. It will combine elements of both Class C2 and Class C3-type accommodation within a single planning unit and so the description of development applied for needs to allow for that flexibility, hence how the application is described. The exact make up of Building A would be secured via condition.
- 5.42 This use reflects the composition of the building which will be made up of a combination of 1 and 2 bedroom flats capable of independent occupation and accommodation more similar to studio apartments and hotel rooms that would not be capable of independent occupation, with the occupants dependant on care provided by the facility. For example, this would include meals as well as health and social care.

- 5.43 The use proposed will also enable the use of individual units to change over time in response to evolving care needs. As the care needs of residents may change, it is possible that they may opt to remain within accommodation configured as independent living, but receive higher levels of care more associated with a Class C2 use and use the space in a way that is not self-contained. This would be facilitated by the use proposed.
- 5.44 This planning application drawings illustrate a mix of Class C2 and Class C3 accommodation which represents one possible configuration of the space within Building A. The Applicant is in discussions with a potential occupier who are continuing to review the UK market to establish the appropriate balance between the different types of accommodation. It is likely that the operational model will continue to evolve as the market is explored. The mix of accommodation within Building A shown indicatively within this planning application is referred to as the “**Indicative Design Scheme.**” Where assessment of the internal arrangements and configuration of Building A is required within this application, this has been carried out on the basis of the Indicative Design Scheme.
- 5.45 As the final configuration of the space is not known, the Applicant proposes that a planning condition would require definitive details of the configuration of the accommodation within Building A, including the numbers of each type of unit and layout of each floor within the building, to be submitted to and approved by the City Council before the start of construction of the phase that includes Building A. The range of possibilities has been assessed and reported on. Further details in this regard are provided at Section 19.
- 5.46 This condition would reflect the potential range in unit numbers, depending upon the balance of independent living and assisted living units. This would allow for:
- i up to 100% independent living (in all cases subject to the age and care requirements). This is the “**Maximum Independent Living**” scheme, or
 - ii up to 84% assisted living with the remainder as independent living. This is referred to as the “**Maximum Assisted Living**” scheme.
- 5.47 Any configuration would therefore always include an element of independent living.

- 5.48 The summary tables 5.2 – 5.4 overleaf demonstrate the breakdown of accommodation by habitable rooms, by floorspace and by units numbers in the Maximum Assisted Living, Indicative Design Scheme and Maximum Independent Living schemes, respectively.

	Maximum Assisted Living	Indicative Design Scheme	Maximum Independent Living
Habitable rooms in Blocks B & C (Class C3)	484	484	484
Habitable rooms in Independent Living in Block A (Class C3)	47	79	232
Habitable rooms in Assisted Living in Block A (Class C2)	139	112	0
Total	670	675	716

Table 5.2 – Proposed habitable rooms, by use

	Maximum Assisted Living	Indicative Design Scheme	Maximum Independent Living
Floorspace* in Blocks B & C (conventional Class C3)	23,092	23,092	23,092
Floorspace in Independent Living in Block A (Class C3)	4,992	7,009	18,345
Assisted Living in Block A (Class C2)	13,353	11,336	0
Total	41,437	41,437	41,437

Table 5.3 – Proposed floorspace, by use

	Maximum Assisted Living	Indicative Design Scheme	Maximum Independent Living
Units in Blocks B & C (conventional Class C3)	163	163	163
Units in Independent Living in Block A (Class C3)	23	37	91
Assisted Living in Block A (Class C2)	119	100	0
Total	305	300	254

Table 5.4 – Proposed units, by use

- 5.49 For the avoidance of doubt, the Environmental Statement submitted with this application has incorporated this flexibility within Building A in its assessment.
- 5.50 In summary, the planning application illustrates the **Indicative Design Scheme**, showing a mixture of assisted and independent living units within Building A. However the Applicant is seeking to agree that the final composition, mix and layout of Building A would be secured by condition, and would fall within the range described by Tables 5.4, above. The Environmental Statement has therefore assessed, as maximum parameters, both:
- i a **Maximum Independent Living** scheme, in which all accommodation within Building A would be independent living units (91 units); and
 - ii a **Maximum Assisted Living** scheme, in which there would be 119 Assisted Living units and 23 Independent Living units.
- 5.51 The details of the mix of accommodation within Building A submitted to discharge the relevant planning condition would show a configuration that would sit between these two parameters. As both parameters have been considered and assessed in the Environmental Statement, the final accommodation mix would, therefore, sit within the ES's assessment parameters.

5.52 For the avoidance of any doubt:

- i The proposed mix within Building B and C would not change; and
- ii The flexibility of accommodation within Building A does not affect the proposed amount of affordable housing, as described at Section 12 below.

Town Centre Uses

5.53 The proposals seek to provide seven flexible retail / restaurant /drinking establishment (Class A1/A3/A4) units, six retail (Class A1) units, one flexible retail/restaurant/office (Class A1/A3/B1) unit and a cinema (Class D2) unit. The proposals also seek to provide affordable retail/office (Class A1/B1) floorspace at the basement level of the Coleshill buildings. The proposals would provide a total of 3,022 sqm (RICS GIA) of retail floorspace and 846 sqm (RICS GIA) of leisure floorspace, totalling 3,868 sqm (RICS GIA). It is proposed that the demise and number of units and position of each use are agreed via condition, something which is explained further within section 19.

5.54 The ground floor has been developed to maximise active frontage and uses. The retail surrounding Orange Square and in the ground floor of the Coleshill Buildings is extended along Ebury Street and Pimlico Road, as well as lining Elizabeth Place, the new pedestrian route through the Site. Retail uses have been strategically located on corner locations, to create character as well as encouraging movement through the Site. A number of food and beverage destinations are anticipated, primarily on the Avery Farm Row frontage, as well as Elizabeth Place. Following local consultation it has been agreed that the food and beverage uses and commercial space will be located away from Ebury Street. A small food store (Class A1) is proposed to activate the street frontage along Elizabeth Place and provided much needed local amenity.

5.55 A flexible Class A1/A3/A4 use is sought for the proposed ground floor units (except the food store and those on Ebury Street) to provide sufficient future flexibility. There would be a maximum of 750 sq m of Class A3 floorspace across the site, and a maximum of 150 sq m of Class A4 floorspace.

5.56 The distribution of uses proposed is illustrated on ground floor plan ref. 288_P20.100.

Community Space

- 5.57 Following consultation with the local community, a ground floor, dual aspect unit at the centre of the site (Building C) and facing Elizabeth Place Gardens is proposed for a community use (Class D1), providing an additional offer for residents and the local community.
- 5.58 At this stage the Applicant has not determined exactly what this space will be used for and rather than proposing something which may change going forwards, seeks flexibility to allow a decision on this to be made closer to scheme completion, post-planning.
- 5.59 The Applicant is committed to ensuring that this space is retained as a community facility in perpetuity and that any operator would be charged a peppercorn rent, this is something which has been included within the accompanying Financial Viability Assessment.

Cinema

- 5.60 A three-screen cinema (Class D2) will be located at the newly formed centre of the development, within the ground floor level, basement level and sub-basement level of Building C. This would act as a use which attracts people to the area.

Coleshill Basement

- 5.61 In addition, the existing Coleshill basement apartments are to be converted to affordable retail / workspace (Class A1/B1) as and when vacant possession is obtained. A maximum of 900 sqm of Class B1 floorspace will be provided across the Site. At this stage listed building consent is not sought for any internal works and, if required, these would be dealt with via a subsequent, stand-alone listed building consent application.

Quantum

- 5.62 The proposed quantum to be provided for each land use is set out in the Table 5.5 below.

Land Use	Existing Floorspace (GIA) sqm	Proposed Floorspace (GIA) sqm	Net Change (GIA) sqm
Market Housing (Class C3)	9,058	12,732	+3,674
Affordable Housing (Class C3)	3,283	10,360	+7,077
Senior living	0	18,345	+18,345
Retail (Class A1)	50	883	+833
Retail/Restaurant/Drinking establishments (Class A1/A3/A4/B1)	0	1,952	+1,952
Community (Class D1)	0	154	+154
Cinema (Class D2)	0	846	+846
Total	12,391	45,272	32,881

Table 5.5 – Existing and proposed floorspace

- 5.63 Throughout this statement, unless otherwise specified, the areas reported do not include basement car parking, servicing and refuse storage – in line with the City Council's definition.
- 5.64 Detailed plans showing the location and distribution of all the proposed land uses have been submitted with this application.

Facades, Materials and Design

- 5.65 The façade of Building A would comprise a precast / technical stone cornice, which wraps the Ground Floor, emphasising the base, while the main body would be brickwork with a dark pigmented zinc standing-seam roof. Reference has been taken directly from the local Conservation Area, in addition to the scale and articulation of the existing building opposite. A palette of subtly varying yellow/buff brick is proposed for Building A, in keeping with the gradation from Elizabeth Street to Pimlico Road. Grey precast/technical stone with inset grey brickwork are used on the uppermost level of Building A, forming a distinct roofscape and differentiating from the rest of the massing from local townscape views. Such grey precast/technical stone lintels and pillars are details inset within the bay articulation, much like the keystones featured within the bays of 95 Eaton Terrace.
- 5.66 The façade of Building B1 would comprise precast modular design with varying inset bays, including grey precast lintels and piers features within each bay. On the ground floor level, the bronze wrapped hardwood window frames would be dark in tone, whilst window frames and balustrades above ground floor level would predominantly comprise dark grey metal. Mid-red brick would be used for Building B1. The ninth floor and tenth floor levels would comprise slightly different façade design, with metal façade and would be stepped back to reduce visibility from ground floor level.
- 5.67 The façades of Building B2 would mediate between the scale, character and appearance of Buildings B1 and B3. Building B2 would continue the tonality of Building B1 with the use of a mid-red brick, as well as the arches over the recessed bays referencing the arched windows on Building B1. Building B2 would comprise setbacks, designed predominantly on the sixth floor to eight floor levels. The façade of Building B2 would comprise precast modular design with varying inset bays, including light grey precast lintels and piers features within each bay.
- 5.68 The eighth-floor level would comprise slightly different façade design, with grey zinc roofing and would be stepped back to reduce visibility from ground floor level. The light tone of brick would be used for Building B3, to complement that of the neighbouring Coleshill Flats. Precast lintels and pier features, including stone horizontal bands, would continue the articulation and horizontality of the Coleshill Flats. The traditional shop fronts would mirror those of the Coleshill, however bronze wrapped hardwood would link all the individual elements of Building B (Building B1 / B2 and B3).

- 5.69 The façades of Building C would comprise setbacks to match the surrounding differences in height and massing, designed on the seventh-floor level. The façade of Building C would comprise precast modular design. On the ground floor level, the bronze wrapped hardwood and painted timber window frames would be dark to medium in tone, whilst window frames and balustrades above ground floor level would predominately comprise light bronze metal. Light yellow brick would be used for Building C, to complement the Coleshill Flats. At first floor podium level the proposed planting would provide visual amenity for residents and visitors. The seventh-floor level would comprise similar façade design to the ground floor level and would be stepped back to reduce visibility from ground floor level. At roof level, two pavilions serve as a roof access to outdoor amenity and as plant enclosure.

Heritage Assets

- 5.70 The Grade II listed Arnridd Johnston Obelisk is currently located in the courtyard of Walden House and would be carefully dismantled, labelled, packaged and stored off site where it would be repaired. Following the completion of the development, the obelisk would be placed into a courtyard which would be accessible via a public route from Ebury Street which also connects to Pimlico Road. The hard landscaping of this courtyard would be centred in the obelisk.
- 5.71 The Grade II listed Marquess of Westminster Memorial Drinking Fountain would also be carefully dismantled, labelled, packaged and stored off site where it would be repaired. The fountain would then be reinstated on the west side of Avery Farm Row and would be reconnected to the water mains. The fountain would be placed on a bespoke pavement whose pattern would centre on the fountain.
- 5.72 It is also proposed to relocate the two Grade II listed K6 telephone boxes to the Courtyard of Walden House whilst construction works are taking place and then to repair the telephone boxes as necessary. This would enable Orange Square to be landscaped. Following completion of the construction works, the K6 telephone boxes will be reinstated in their original location, albeit slightly set to the southwest to enable the placement of a planting bed.

Vehicular Access, Servicing and Parking

- 5.73 The key points of vehicular access would be located along Cundy Street and Pimlico Road, via car lifts for the parking within the basement level beneath Building A and B. In addition there would be two valet operated vehicular pick-up / drop-off points along off-street along Cundy Street and on the carriageway of Ebury Square. The Proposed Development will not include any internal vehicular routes. The new public routes through the site would be cycle-free.
- 5.74 All uses within Building A would be serviced via an internal area located within the ground floor level of the building, able to accommodate an 8m vehicle. The servicing area would be accessed from Cundy Street and would be adjacent to the residential basement car parking access.
- 5.75 Similarly, for Building B, a dedicated internal delivery and servicing area would be located on the ground floor level adjacent to the residential basement car parking access. The servicing area for Building B would be accessed from Pimlico Road.
- 5.76 A new loading pad would be located along Ebury Street, to be used as a delivery and servicing area for Building C. The bay would also work to formalise existing deliveries for the on-Site residences and retail units on Ebury Street. The loading pad is capable of accommodating one vehicle up to 10.5m in length or two smaller cars / LGVs.

Car Parking

- 5.77 The Development would provide a total of 38 car-parking spaces, substantially less than what is currently at the Site. These would be allocated as follows:
- 5.78 A total 18 car-parking spaces within the basement floor level of Building A. These spaces would be allocated for the following:
- i. Two parking spaces for disabled staff associated with the Senior Living residential element, including one fully designed disabled bay.
 - ii. One parking space for disabled visitors visiting Senior Living residents.
 - iii. Four parking spaces reserved for disabled residents.

iv. 11 general parking spaces for residential vehicles.

- 5.79 A total of 20 car-parking spaces are proposed within the basement floor level of Building B. These spaces would be for the residents of Building B, whilst two of these spaces would be designated disabled bays, with the flexibility of three more to be converted as such.
- 5.80 No general or disabled parking would be provided for the non-residential land uses included as part of the Development. As requested during pre-application consultation, all car parking within the Development would have active electric-vehicle charging points (EVCP).

Cycle Parking

- 5.81 The Proposed Development would provide a total of 367 long stay cycle-parking spaces for residents and employees. These spaces would be provided across the basement floor level and ground floor level of each of the Buildings. A total of 90 of the 367 long stay cycle-parking spaces would be provided in Building A and 85 in Building C. The majority of the long stay cycle-parking spaces would be provided in Building B, including 192 of the overall 367 long stay cycle-parking spaces for the Development.
- 5.82 Residential cycle spaces for Building A would be accessed, via a cycle lift, from Elizabeth Place. For residents of Buildings B and C, cycle spaces would be accessed via cycle lifts from Pimlico Road and Five Fields Row respectively. The re-provided cycle spaces for the existing residents of the Coleshill Flats would be accessed from Elizabeth Place Gardens.
- 5.83 The Development seeks to provide a total of 92 short stay spaces at surface level, with the majority being provided along Pimlico Road and Ebury Street and adjacent to / within Orange Square and Ebury Square. This would be subject to detailed design as part of the proposed highway works.

Landscaping and Amenity Space

- 5.84 The Proposed Development proposes a variety of shared and private amenity spaces at different levels, offering diverse amenity for residents of the development as well as visual amenity for visitors and the wider local community.

- 5.85 Beyond the access route through the Site, proposals include a new, large public garden at Elizabeth Place Gardens, and a new, public square at Elizabeth Place, which has been designed to facilitate a range of appropriate events. These landscape features ensure that high quality, publicly-accessible spaces are accessible to visitors and contribute to broader public realm aims of the borough.

Shared Spaces

- 5.86 Shared outdoor amenity space within Building A is split between a generous courtyard garden located at first floor level, and a small south facing productive garden on the eighth floor.
- 5.87 Building B has a shared garden located at first floor level, providing amenity space for all residents of Buildings B1, B2 and B3. This garden forms an important backdrop to the newly formed Elizabeth Place, as well as providing residents with an opportunity to engage with the public realm below.
- 5.88 In addition to the first-floor garden, a roof garden at fifth floor level on Building B3 provides additional shared amenity space for the residents of Buildings B2 and B3 (intermediate), as well as providing play space for these residents.
- 5.89 The residents of Building C have access to a range of shared outdoor amenity spaces at multiple levels. Shared gardens are provided at first, fourth and seventh levels. The roof garden on the seventh floor also provides the residents' play space.
- 5.90 In addition to the shared amenity space within the individual buildings, a part of a Elizabeth Place Gardens would provide a shared outdoor amenity space for the residents of the Proposed Development, as well as residents of the Coleshill Flats. Elizabeth Place Gardens would be gated and would not open to the public in the evenings.

6. Consultation and Community Engagement

- 6.1 In respect of pre-application engagement, paragraph 39 of the National Planning Policy Framework (NPPF) confirms that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”*
- 6.2 In addition, paragraph 41 of the NPPF states that:
- “The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.”*
- 6.3 Policy GG1 part A of the Intend to Publish London Plan encourages early and inclusive engagement with stakeholders and local communities on the development of proposals.

Pre-application discussions with the City of Westminster

- 6.4 The Proposed Development has evolved through a series of pre-application meetings with the City Council. The design team have undertaken a number of pre-application meetings with officers in respect of topics relating to design, land use, affordable housing, residential standards, highways, heritage, servicing, waste and recycling, daylight and sunlight, access, and trees/public realm. The proposals have therefore developed iteratively in direct response to Officer feedback.

Statutory and Non-Statutory Consultations

- 6.5 Paragraph 42 of the NPPF confirms that *“The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later*

stage. Wherever possible, parallel processing of other consents should be encouraged to help speed up the process and resolve any issues as early as possible.”

- 6.6 Consultation with statutory and non-statutory bodies took place as part of the design process. Consultations have taken place with the GLA, Historic England, TFL, Thames Water, Walden House Households, residents of Coleshill Flats, Belgravia Residents Association, Belgravia Society, Churchill Ward Members, and Planning Committee Members.

Overview

- 6.7 From the outset, the Applicant has set out to undertake an exemplary programme of public engagement.
- 6.8 The objective of the engagement and consultation process has been to ensure that the community has had the opportunity to understand and help shape the proposals. There have been a number of principles that have guided this process:
- i. Starting early: Comprehensive engagement with communities from an early stage in the process enabled local people to play a role in the development of the masterplan and ultimately helped create a better proposal.
 - ii. Ongoing dialogue: Regular feedback to the community on how the proposals have evolved and how views and comments have been taken on board. The Applicant is committed to an on-going conversation to continue throughout the development process and into the future - during construction phases and management.
 - iii. Engaging all in the community: This has been achieved by sharing information with a wide distribution area and leveraging online engagement platforms such as Give My View.
- 6.9 The proposals for the Proposed Development have been presented to several community stakeholders and residents organisations as well as the wider public. There have also been a number of discussions with the local Council and the GLA through a series of pre-application meetings. In addition, there have been several briefings with local politicians and Ward Councillors. A wide range of techniques have been used including:

- i. Personal contact and briefings of key stakeholders (in-person and online during the Covid-19 period);
- ii. Public drop-in events at each stage of the consultation;
- iii. Door knocking prior to public drop-in events to encourage attendance;
- iv. Workshops for existing residents;
- v. Meet the team events;
- vi. Printed communications;
- vii. Project website;
- viii. Online survey using Built-ID's Give My View platform;
- ix. Youth engagement including co-designed survey and focus groups.

Public Exhibitions

- 6.10 During the design process various public consultation exhibitions were held at different locations in the vicinity of the site - in April 2019, June 2019, December 2019, January 2020 and May 2020. All, with the exception of the May 2020 exhibition, were before the Covid-19 lockdown.

Public Engagement (Phase 1)

- 6.11 An initial public exhibition was held between 3 April 2019 and 6 April 2019 at 198 Ebury Street, Belgravia – which is very close to the Site. This exhibition was designed to ensure that local people and third parties were given the opportunity to learn about the development and share their comments at an early stage in the preparation of the application. The first consultation meeting provided insights on urban research, as well as initial information about the existing site and the development masterplan objectives.
- 6.12 Nearby landowners, tenants on the site, and organisations, were made aware of the public exhibition via a combination of emails, the project website, knocking on doors and handing

out flyers. A list of those individuals and organisations invited and made aware of the exhibition can be made available if required.

6.13 Between 3 April 2019 to 6 April 2019 more than 300 people attended over the course of the three days. At the public exhibition, visitors were given the opportunity to provide written feedback on the scheme proposals via a comments form.

6.14 The reception to the initial consultation event was balanced. Many were receptive towards the ideas presented, particularly about the:

- i. New pedestrian routes through the neighbourhood;
- ii. Additional green space and planting;
- iii. Investment in the area;
- iv. Mix of homes;
- v. Early engagement with the community at the start of the development process.

6.15 When asked what was missing from the area people reported that they would like to see community facilities, shops & amenities, improved green spaces and new homes. When asked for more detail on what community facilities were needed, the top two responses were a multi-purpose hall and local food store.

6.16 The Applicant reviewed the feedback received and published the results and details at the second public consultation held event in June 2019.

6.17 In response to the comments received, the Applicant was able to progress the masterplan with design with a much clearer idea of what the local community needs were and made the following amendments to the scheme:

- i. Introduced a broader mix of uses including a food store and community space; and
- ii. Confirmed the inclusion of senior living accommodation in the Proposed Developments.

Public Engagement (Phase 2)

- 6.18 Following the design development of the scheme, a second public exhibition took place on 19, 20 and 22 June 2019 at 46 Pimlico Road, SW1W 8LP. This consultation showed emerging designs, including a scaled 3D model and initial design sketches, and focused on masterplan, massing and ground floor uses. The proposals presented had been developed and informed by the feedback received from interested parties during the initial public consultation event. Over 200 visitors attended the second exhibition across the three days.
- 6.19 The reception to this second stage of consultation was largely positive towards the ideas presented. Whilst turnout at the exhibition was lower than compared to the first consultation, more in-depth conversations were had with attendees over the developed proposals presented. Several commented positively on how the plans were progressing and the ambitions of the project, with support focusing on:
- i. Evolution of the proposals in line with feedback e.g. mix of homes and types of shops;
 - ii. Commitment to provide more onsite affordable homes;
 - iii. Proposed local stores to enable a village-feel in keeping with the existing neighbourhood;
 - iv. Proposal of a community space;
 - v. Creation of a series of public places, and improvements of existing ones;
 - vi. Approach to landscaping, biodiversity, climate resilience and waste;
 - vii. Aspiration to provide leisure uses –when asked what people wanted to see included here the top response was a boutique cinema.
- 6.20 Concerns expressed by people centred around the:
- i. Height of the building overlooking Ebury Square and Pimlico Road;
 - ii. Quantum of retail proposed along Ebury Street.

6.21 In response to the comments received, the Applicant made the following commitments:

- i. Reduce one storey from Building B1 from 12 to 11 storeys;
- ii. to rehouse the Walden House residents on-site once redeveloped;
- iii. to include a cinema; and
- iv. to remove retail uses from the Ebury Street frontage.

Public Engagement (Phase 3)

6.22 Following the detailed design of the scheme, a third public exhibition took place between the 4, 5 and 7 December 2019, and a follow up on 16th January 2020 at 20-22 Pimlico Road – which forms part of the Site. A masterplan to show the mix of uses, highlighting where changes had been made to the proposals to reflect local comments, was presented. The display also outlined the design approach and gave details on the proposed heights of buildings, indicative materials palettes and included a detailed scaled 3D model. A series of views and an animated walk-through to give a feel for what the area could look like were also shared.

6.23 Those interested parties who attended were given the opportunity to share their comments prior to the submission of the application for planning permission and listed building consent. Over 200 visitors attended the exhibition across the three days.

6.24 Overall the response to the proposals was positive, particularly regarding the:

- i. Level of detail shared and progression since June;
- ii. Mix of homes and the provision of affordable housing and senior living;
- iii. Mix of uses including the shops, amenities and community space;
- iv. Improved green space and new planting.

6.25 When asked whether there were any aspects which caused concern, the most cited responses focused on:

- i. Approach to existing residents;
- ii. Height and brick tone of the tallest building;
- iii. Affordability of the homes;
- iv. Disruption during construction.

6.26 In response to the comments received, the Applicant has made the following amendments:

- i. Relocation of access for senior living from Ebury Street to Cundy Street;
- ii. A commitment to a one move solution for the residents of Walden House; and
- iii. Lightened the brick tone of Building B1.

6.27 Overall, across the three phases of public exhibitions, over 700 people attended. There have been 18,000 website views, and 2,000 people have answered feedback forms online via Built ID. The team has reflected on the points raised and sought to address them, where possible, in the application submission.

Public Engagement 4

6.28 As the Applicant was unable to hold the intended public exhibition prior to the submission of the application in person due to the Covid-19 restrictions, the team worked hard to ensure all interested parties were still able to engage properly. By way of summary the following was carried out in April / May 2020:

- i. The website www.cundystreetquarter.com was fully updated to reflect all the information normally shared at public events and provided a clear opportunity for residents to share their thoughts on the proposals;
- ii. A summary of the proposals was emailed to stakeholders on the Applicant's database which highlighted the key points and online briefings held with local Ward Members and amenity societies;
- iii. The summary of proposals was also distributed to 13,000 homes and businesses locally to ensure anyone without internet access had the information;

- iv. A series of online briefings were held with the Applicant during which the team were able to answer questions on the proposals. Three sessions were held at various times over a two-week period;
- v. Two dedicated online briefings were held with residents of Walden House to further explain the proposals;
- vi. Residents were provided with contact information including a number and email address should they have any questions.

6.29 All the views and comments expressed in response to information given and discussions about the proposals have been recorded in the Statement of Community Involvement which accompanies the planning application.

Key Stakeholders

6.30 In addition to the above, there has been considerable engagement with key stakeholders including:

- i. The existing residents on site at Walden House, Cundy Street and in the Coleshill Buildings;
- ii. City Council residents in Semley House and Fountain Court ;
- iii. Residents of Mozart Terrace, Ebury Street;
- iv. Belgravia Residents Association;
- v. Belgravia Society;
- vi. Belgravia Neighbourhood Forum;
- vii. Local Businesses;
- viii. Local Ward Members and Politicians;
- ix. Young Westminster Foundation;
- x. St Barnabas Primary School and Francis Holland School;

xi. Doctors at the Belgravia Medical Centre; and

xii. The Pimlico Road Farmer's Market.

6.31 Full details of the engagement undertaken are set out in the accompanying Statement of Community Involvement.

6.32 An important aspect that has influenced the consultation process is the differing interests and subsequent responsibilities on the Site. The Applicant owns the majority of the Site and as a result has been responsible for the consultation regarding the Site throughout the process of developing the scheme. The City Council, as the landlord of Walden House has been responsible for engagement with their residents on specific landlord and tenant issues in respect of Walden House matters. The City Council's involvement with its residents is not included in this report as it is not directly pertinent to this planning application and could contain confidential personal information.

6.33 Overall, the proposals have demonstrably responded to stakeholder feedback received during the pre-application consultation process and the Applicant will continue to communicate regularly and openly with all stakeholders throughout the planning process and, should permission be granted, subsequently the construction phase.

6.34 The final proposals are the result of an extensive period of ongoing consultation with relevant local groups, stakeholders and decision-making bodies. Significant amendments have been made to the scheme as a result of these discussions and comments made regarding the proposals. The scheme therefore complies with the Localism Act's duty to engage with the local community during the planning process.

7. Planning Policy Framework

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 7.2 Planning policy operates at national, regional and local levels. At a national level, Central Government published the National Planning Policy Framework (NPPF) in February 2019. The statutory development plan for the Site comprises, at a regional level, the London Plan (March 2016) and at the local level the Westminster City Plan: Strategic Policies (November 2016) and the Saved Policies of the City of Westminster Unitary Development Plan adopted 2007, saved in 2010.

National Guidance – The National Planning Policy Framework (NPPF), February 2019

- 7.3 The NPPF published in February 2019, which supersedes the previous versions from July 2018 and March 2012, sets out the Government's economic, environment and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.4 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Planning Practice Guidance (PPG) (March 2014 and updated regularly since)

- 7.5 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based Planning Practice Guidance (PPG) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner.

- 7.6 With regard to decision taking, the PPG is a material consideration in the determination of planning applications.

Regional Planning Policy – The London Plan (March 2016)

- 7.7 The London Plan is the overall strategic plan for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan forms the London-wide policy context within which the boroughs set their local planning agendas and forms part of the Statutory Development Plan.
- 7.8 The Mayor consulted on the draft New London Plan between 1 December 2017 and 2 March 2018. The draft London Plan Examination Hearing sessions were held between 15 January and 22 May 2019. The Panel of inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8 October 2019. The Mayor considered the Inspectors' recommendations and, on 9 December 2019, issued to the Secretary of State his intention to publish the London Plan. The version of the plan that the Mayor intended to adopt is referred to as the "Intend to Adopt" version of the draft London Plan.
- 7.9 The Mayor of London received a letter from the Secretary of State on 13 March 2020 directing him to make specified changes to the Plan prior to adoption. The representations made by the Secretary of State are to elements of the London Plan and note (among other things) that *'it is important that development is brought forward to maximise site capacity, in the spirit of and to compliment the surrounding area.'* The Mayor of London indicated, in a letter of 24 April, that he is seeking to enter into discussions with the Secretary of State regarding the changes that he has been directed to make. In our judgement the issues identified by the Secretary of State do not bear materially on the policies most relevant to this application, in the sense of undermining what they say. Accordingly, though not formally adopted, the Intend to Publish London Plan policies are relevant to this development and we consider that they should be treated as having significant weight in the determination of planning applications by the Mayor.

- 7.10 In those limited areas where there may be a divergence in policy between the published London Plan and the draft (Intend to Publish) London Plan, the Intend to Publish plan has been preferred.
- 7.11 The following GLA Supplementary Planning Guidance (SPG) documents are also material considerations:
- i. Affordable Housing and Viability (August 2017);
 - ii. Housing (March 2016);
 - iii. Social Infrastructure (May 2015);
 - iv. Accessible London: Achieving an Inclusive Environment (October 2014);
 - v. The control of dust and emissions during construction and demolition (July 2014);
 - vi. Character and Context (June 2014);
 - vii. London Planning Statement (May 2014);
 - viii. Sustainable Design and Construction (April 2014);
 - ix. Play and Informal Recreation (September 2012);
 - x. London View Management Framework (March 2012); and
 - xi. Planning for Equality and Diversity in London (October 2007).

Westminster City Plan: Strategic Policies (adopted 2016)

- 7.12 The Westminster City Plan: Strategic Policies (adopted 2016) and the saved policies of the 2007 Unitary Development Plan (UDP) are the local parts of the development plan.
- 7.13 The City Council is currently working on a review of its City Plan. Informal consultation on the first draft of Westminster's City Plan 2019-2040 took place in November and December 2018. Following this informal consultation, the draft plan was revised and formal consultation under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 was carried out in Summer 2019. The Council then reviewed the comments received and the City Plan 2019-2040 was submitted for examination to the Planning Inspectorate on the 20 November 2019.
- 7.14 The Inspectors examining the Westminster City Plan requested additional evidence and in April 2020, The City Council submitted an updated schedule of proposed minor pre-examination modifications. Following this, the Inspectors published Matters, Issues and

Questions at the beginning of May. However, the timings of the Examination in Public of the City Plan remain uncertain due to the Covid-19 situation and are expected to take place in Autumn or Winter. Given that the City Plan Examination has been delayed without consideration of the draft policies, and having regard to the tests set out in paragraph 48 of the NPPF, the policies of the emerging draft City Plan are given little weight at the present time.

7.15 The following the City Council Supplementary Planning Guidance (SPG) documents are also material considerations:

- i. Advertisement Design Guidelines SPG (1992);
- ii. Archaeology and Planning in Westminster SPG (1994);
- iii. Basement development in Westminster SPD (2014);
- iv. Design Matters in Westminster SPG (2001);
- v. Designing out Crime in Westminster SPG (1997);
- vi. Development and demolition in Conservation Areas SPG (1996);
- vii. Inclusive Design and Access SPG (2007);
- viii. Public Art in Westminster SPG (1992);
- ix. Shopfronts, blinds and signs SPG (1990);
- x. Statues and Monuments SPD (2008);
- xi. Trees and the Public Realm: A strategy for Westminster SPD (2011);
- xii. Westminster Way: Public Realm Strategy SPD (2011).

Neighbourhood Plan

7.16 Section 38(2) of the Planning and Compulsory Purchase Act 2004 states that the development plan in any area in Greater London also includes neighbourhood development plans which have been made in relation to the area.

7.17 The Belgravia Neighbourhood Forum has been established to progress a Neighbourhood Plan. The Forum designation expired on 8 October 2019 and the Forum subsequently submitted a request to re-designate the Belgravia Neighbourhood Forum to the City Council. On 13 January 2020, the Cabinet Member for Place Shaping and Planning agreed to re-designate the Belgravia Neighbourhood Forum for a further period of 5 years. The Belgravia Neighbourhood Forum are preparing a draft Neighbourhood Plan; however, this

is at an early stage and has not been published. Accordingly, there are no Neighbourhood Plan policies to consider as part of this application.

8. Planning Consideration – Principle of Development

- 8.1 At a national level, the NPPF Paragraph 8 sets out three overarching sustainable development objectives. These overarching objectives include a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations and an environmental objective which includes making effective use of land.
- 8.2 Chapter 11, Paragraph 118 states that planning decisions should promote and support the development or under-utilised land and buildings, especially if this would help to meet identified needs for housing and give substantial weight to the value of using suitable brownfield land. It also promotes mixed-use developments and the provision of specialist housing for the elderly and those with disabilities.
- 8.3 Within Policy GG2 of the Intend to Publish London Plan, it is stated that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, prioritising sites which are well connected. In addition, developers and planners are to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations which are well connected.
- 8.4 Within Policy GG2 of the Intend to Publish the Mayor emphasises the need to understand what is valued about existing places and use this as a catalyst for growth, renewal and place-making, and in the application of a design-led approach to determine the optimum development capacity of sites.
- 8.5 At a local level, within the adopted plan a number of strategic policy objectives are set out which include a desire to increase the supply of good quality housing to meet Westminster's housing need, including the provision of affordable housing and homes for those with special needs.

Assessment

Drawbacks of the existing site

8.6 The existing Site contributes little to the surrounding environment and has a number of significant drawbacks including:

- i The layout of the Estate, set at 45 degrees to the historic streets around it creates a sterile relationship with the street along Cundy Street, Ebury Street and Pimlico Road;
- ii The Cundy Street Flats and Walden House do not offer any permeability for the wider community as the site is gated along Ebury Street, Cundy Street and Pimlico Road and is closed to public access;
- iii The lack of active frontage at ground floor level have led to anti-social behaviour problems in Orange Square and in Ebury Square which is largely unused. In Ebury Square, dense, overgrown planting and under maintenance have exacerbated the issue and require urgent attention. The Coleshill car park also attracts anti-social behaviour;
- iv The quality of the existing accommodation at Walden House is also of a poor standard and falls below the size standards
- v The existing density is significantly below that considered efficient in a central location with good transport connections and represents an inefficient use of land;
- vi The ground plane of the Site is car dominated and provides no publicly accessible amenity space. There is no amenity space beyond a small, paved, courtyard for Walden House;
- vii The existing buildings are not energy efficient and fall well below modern standards.

8.7 Whilst the Site sits between Ebury Square and Orange Square at the confluence of many key local routes from Belgravia, Chelsea and Pimlico / Victoria, it is not currently a destination as it offers little to those passing by. The existing Site can be described as a void in terms of pedestrian flow.

Opportunity

8.8 The Applicant identified that there was an opportunity to improve the contribution of the Site to the wider Belgravia area. Grosvenor developed a strategic brief and project vision

for the area which was to create a reinvigorated neighbourhood that reflected their wider Estate Vision.

- 8.9 The driving principle was to create a new development which responds to its unique location and surrounding context, and to create a high-quality environment for residents, workers, visitors, and neighbouring residents through sensitive, contemporary architecture and design

Options Considered

- 8.10 A number of alternative designs were tested, namely the refurbishment of the existing building, the refurbishment and extension of the existing building and a wholesale redevelopment option. All of these options were evaluated in terms of their benefits – namely site wide benefit, housing offer, public realm improvements and environmental performance.

i Light Touch Refurbishment

- 8.11 The option for light touch refurbishment work to the existing Cundy Street Flats and Walden House would entail upgrading light fittings, floor finishes and painting.
- 8.12 With this option the existing fabric and site condition would remain unchanged. Whilst the proposals would improve the internal accommodation, there was little if no benefit to the community and surrounding areas. The fundamental drawbacks of the scheme identified would remain unchanged. The overall amount of housing on the Site would remain as existing and there would be no opportunity to expand the mix of uses. In addition, the environmental performance of the building would remain unchanged.

i Refurbishment and Extension

- 8.13 A refurbishment and extension option was also investigated. This approach sought to maximise the residential offer on-site while retaining the existing buildings and improving the urban fabric. The proposals involved:
- i Extending the floor plan footprint of the existing Cundy Street Flats on each floor to the interior of the Site, creating extended entrance areas at ground floor and providing bigger apartment units above;

- ii A new roof pavilion extension to the top floors of the existing building set back from the main envelope and in a different architectural language from that existing;
- iii Introduction of gate house blocks along Ebury Street and Cundy Street with residential accommodation above as vehicle access/entrances for drop off;
- iv Along Ebury Street and Pimlico Road new residential blocks abutting the listed Coleshill Flats;
- v New block of mews houses providing additional accommodation to the south of the Site and relating to the existing Coleshill Flat rear elevations.

8.14 These proposals would address some of the major drawbacks of the Site in that it would be possible to extend some of the area of the current units within Cundy Street and Walden House. In addition, there would be some minor increases in the overall apartment numbers which would improve the efficiency of the Site. The scheme also allowed for some improvements to the private shared amenity spaces at ground floor level and to the existing street scape and some improvements in terms of environmental performance owing to the fact that the new buildings would be designed to meet current standards.

8.15 However, there would only be limited opportunity to improve the public realm around the Site and this would be limited to residents only. It was felt that this option did not go far enough to address the fundamental drawbacks of the existing site.

i New Development Scheme

8.16 The new development scheme included the complete demolition of the existing building and has evolved throughout the design development to arrive at the preferred scheme and the subject of this application.

Assessment of Options

8.17 Following a review of the options the Applicant discounted the light touch refurbishment, and the refurbishment and extension options, in favour of a new development scheme, as it addressed more of the major drawbacks of the Site and offered considerable benefits including:

- 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%⁶;
- 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;
- 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;

⁶ That is, 47% of the habitable rooms in the Class C3 residential accommodation and independent living within Building A.

xviii Refurbishment of the Grade II listed obelisk, water fountain and K6 telephone boxes;

xix c. £20m Community Infrastructure Levy contribution.

- 8.18 By demolishing the existing buildings on Site, it would be possible to address the issues identified and deliver a scheme which made more efficient use of the land, would increase the provision of housing and affordable housing and which would provide a positive contribution to the immediate surroundings as well as the neighbouring conservation area.
- 8.19 In addition, the demolition of the buildings provided an opportunity to create a new area which can reconcile the unique street conditions at this gateway location, offering the surrounding streets improved visual permeability and amenity and unlock the potential of the existing public open spaces of Ebury Square and Orange Square to be used to their fullest potential by the community. These benefits would not be possible from a scheme which retained the existing building.
- 8.20 For these reasons, demolition and comprehensive redevelopment will optimise the use of the Site, it is the most beneficial approach in terms of carbon usage per sqm and it would provide significant public benefits that even extensive refurbishment and extension could not.

Heritage

- 8.21 In heritage terms the principle of demolition is considered acceptable. None of the existing buildings are listed. A Certificate of Immunity against listing was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended on 31 October 2013 in respect of Lochmore House, Laxford House, Stack House and Kylestrome House. The Certificate prevents listing within a 5-year period and therefore the Cundy Street flats have immunity against listing until 30 October 2018. The Certificate of Immunity was subsequently renewed on 16 May 2018 and expires on 15 May 2023. The majority of the Site is not within a conservation area and, consequently, the demolition of the existing buildings would be permitted development subject to prior notification to the City Council.
- 8.22 As set out within the submitted historic buildings report and in section 10 of this report, the impact of the demolition of Cundy Street Flats and Walden House would result in the loss of two non-designated heritage assets, and this would cause some harm. For Walden House this harm would be lesser because the significance of Walden House is limited; it

relates to the relatively rare provision of social housing at the time, and there is no architectural significance associated with this building.

- 8.23 Conversely, Cundy Street Flats are of some architectural quality, and the harm caused by their demolition would be slightly greater than for Walden House. However, these buildings, whilst handsome, also detract from the setting of Ebury Street and the Belgravia Conservation Area due to their irregular alignment; their removal is therefore not considered by Donald Insall Associates to be altogether harmful.
- 8.24 The proposed scheme overall would create a wide range of social, economic and environmental public benefits which would amply outweigh the harm described above. The benefits are outlined in full in Section 10 of this report.
- 8.25 In addition, the impact of the new development on the setting of the Belgravia Conservation Area and the setting of nearby listed buildings on Pimlico Road and Ebury Street would be overall beneficial; the re-introduction of perimeter buildings on both streets, and the creation of carefully detailed new buildings in appropriate materials would enhance the setting of these streets. In particular, the reintroduction of perimeter buildings would improve the settings of the listed buildings on the north side of Ebury Street, namely nos. 162-170, 172, 174, 182 and 184-188 (all Grade II listed), and 180 Ebury Street (Grade I), as well as the setting of Coleshill Flats (Grade II) on Ebury Street.
- 8.26 As set out in Section 10, the proposals comply with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; paragraphs 193, 196, 197 and 200 of the NPPF, and Westminster's local plan.

Whole Life Carbon

- 8.27 A study to compare Operational and Whole Life Carbon Emissions between existing, other considered options (including light touch refurbishment and refurbishment & extension) and the Proposed Development was undertaken by Cundall. The study shows that based on a square metre measurement the proposal will, over the standard 60-year life cycle, produce significantly less carbon when compared against the alternative options.

Introduction of Land Uses

- 8.28 The Proposed Development seeks to create a new urban quarter at the heart of Belgravia through the provision of a mix of uses, high quality architecture, public realm and landscaping which encourages activity and permeability through the Site.
- 8.29 The development would provide homes (including affordable homes) as well as specialist accommodation for older people, alongside a range of complementary commercial units and community facilities for use by the existing community and new residents.
- 8.30 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 created will be affordable.⁷
- 8.31 The provision of a significant amount of housing on this under-utilised brownfield Site would assist the City Council and the Mayor in meeting local and strategic housing need. The principle of housing development in this location is entirely appropriate and in accordance with planning policy.
- 8.32 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. This would also result in the release of local family sized housing.
- 8.33 There is recognition in paragraph 61 of the NPPF that the supply of homes should take account of different groups in the community including homes for older people. The PPG also recognises that the need to provide housing for older people is critical, offering older people a better choice of accommodation to suit their changing needs can help them live independent for longer and feel more connected to communities.
- 8.34 Section 4.13.8 of the Intend to Publish London Plan identifies a total potential demand in London across all tenures for just over 4,000 specialist older persons units a year between 2017-2029. Table 4.3 of the Intend to Publish London Plan shows that the annual borough

⁷ That is, 47% of the habitable rooms in the Class C3 residential accommodation and independent living within Building A.

benchmarks for specialist older persons housing between 2017-2029 for the City of Westminster is 100 units per annum.

- 8.35 Section 4.13.14 of the Intend to Publish London Plan recognises that care home accommodation (Class C2) is an important accommodation option for older Londoners. To meet the increase in demand for care home beds to 2029, it is estimated that London needs to provide an average of 867 care home beds per year.
- 8.36 The senior living accommodation would meet identified local demand in a location which is suitable and accessible. This is in line with NPPF aspirations, the London Plan and Mayor's Housing SPG as well as the City Council's planning policies. Therefore, the principle of this use is acceptable.
- 8.37 The ground floor uses will contribute to promoting the activity and viability of the Pimlico Road local centre. The scale of the retail proposed is appropriate to the size of the development proposed and will serve newly created local needs. The scheme proposes a range of flexible uses with suggested caps to ensure a true mix of uses come forward to achieve a vibrant living quarter. The retail would complement, not compete with nearby retail centres as discussed in more detail in subsequent sections. The proposed cinema would have a positive and beneficial impact in the area, addressing a demand. The cinema will activate the ground floor of the development into the evening and attract people to the area.
- 8.38 The Proposed Development will enhance and promote sustainable development with a mixed-use development, that has been conceived as an integral part of the townscape. The land uses proposed are entirely appropriate in principle and will create a strong, vibrant and healthy community contributing towards the aims of sustainable development.

Conclusion

- 8.39 There are no physical or environmental reasons that would prevent the Site being redeveloped. The principle of the proposals is supported by national planning policies and guidance, at the strategic London-wide level, and in local policies, objectives and guidance.

9. Planning Consideration – Sustainability and energy

- 9.1 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 9.2 The NPPF contains the Government's policy on climate change. Paragraph 149 states that local planning authorities are required to adopt proactive strategies to mitigate and adapt to climate change.
- 9.3 Chapter 5 of the London Plan considers climate change. Policies 5.1 and 5.2 focus specifically on how to mitigate climate change and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Developments are required to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions (be lean), adopting sustainable design and construction measures and prioritising decentralised energy (be clean) and by including renewables (be green). Policy 5.2 requires savings provided through this energy hierarchy to lead to an overall reduction in carbon emissions over minimum building regulation levels.
- 9.4 Policy 5.5 of the London Plan seeks to ensure that all Development Plan Documents (DPDs) identify and safeguard existing heating and cooling networks and maximise the opportunities for providing new networks that are supplied by decentralised energy. The Mayor and boroughs will also work to identify and establish network opportunities to ensure delivery of networks and to maximise potential for existing development to connect to them. Decentralised energy in development proposals is addressed through policy 5.6 in the London Plan which requires all development proposals to evaluate the feasibility of Combined Heat and Power (CHP) systems.
- 9.5 Policy 5.6 seeks to ensure developments evaluate CHP systems and where a new CHP system is appropriate examine opportunities to extend the scheme beyond the site boundary.
- 9.6 In support of the policies of the London Plan, the Mayor's SPG on Sustainable Design and Construction provides the context for all developments and provides a mechanism for addressing climate change impacts through new developments. As an update to the 40% carbon reduction target set out in London Plan policy 5.2, the SPG states that the Mayor

will adopt a flat carbon dioxide improvement target beyond Part L 2013 of 35% to both residential and non-residential development.

9.7 Part A of Policy SI 2 of the Intend to Publish London Plan states that major development should be net carbon zero. Greenhouse gas emissions should be reduced, and annual and peak energy demands minimised in accordance with the following, updated energy hierarchy:

- i Be lean: use less energy and manage demand during operation;
- ii Be clean: exploit local energy resources and supply energy efficiently and cleanly;
- iii Be green: maximise opportunities for renewable energy on site;
- iv Be seen: monitor, verify and report on energy performance.

9.8 Part C of this policy goes on to state that the following targets should be achieved by major developments: Net zero carbon with at least 35 per cent reduction in carbon emissions beyond Part L of the 2013 Building Regulations and that residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent, energy reductions through energy efficiency ('Be Lean') measures.

9.9 In terms of sustainability, London Plan policy D3 requires that development proposals should aim for high sustainability standards.

9.10 In April 2020, the GLA released updated Whole Life Cycle Carbon Assessments Guidance and Energy Assessment Guidance.

9.11 At a local level, City Plan Policy S40 states that *'all major development throughout Westminster should maximise on-site renewable energy generation to achieve at least 20% reduction of carbon dioxide emissions, and where feasible, towards zero carbon emissions, except where the council considers that it is not appropriate or practicable*

Assessment

9.12 The Applicant is committed throughout its property ownership to adapt to and mitigate the impacts of climate change. It has unilaterally developed environmental goals which go

beyond current planning policy requirements. These include the following in terms of buildings which are within its control:

- i ensuring that buildings will, in terms of their operations, be net zero carbon by 2030;
- ii ensuring that waste from buildings within its control will be eradicated by 2030;
- iii All strategic suppliers will be required to meet the minimum standards within its own Supply Chain Charter, as part of this consideration will need to be given to the impact of materials selected as part of its developments on the environment.

9.13 The Applicant appointed Cundall to advise on energy and sustainability matters at an early stage of the project to ensure that the need for the Proposed Development to be an exemplar in terms of carbon usage was considered at the outset.

9.14 Before making a decision on whether the Proposed Development should comprise new buildings following substantial demolition, light touch refurbishment as well as a refurbishment and extension option were considered. However, to enable the Proposed Development to provide an improved density at this central London Site which would result in maximising the range of wider planning benefits, it was decided to progress with this option. It was also understood at an early stage that, on an area basis, due to operational savings, over a standard 60-year lifecycle period, the Proposed Development would result in significantly less energy usage even where the carbon embodied within the current structures was considered.

9.15 In terms of energy performance, the accompanying Energy Statement prepared by Cundall sets out how the Proposed Development accords with policies and energy efficiency against Standard Assessment Procedure (SAP) 10 carbon factors. This is summarised below by a summary against the GLA's energy hierarchy.

9.16 The Be Lean Strategies for the Proposed Development are as follows:

- i. The buildings envelope will be designed to perform significantly better than the Building Regulation standards with low U-values, G-values, Y-values and a low air permeability to control heat transfer through the envelope;

- ii. Passive solar considerations have formed an integral part of the design for the Proposed Development. Analysis has been carried out to optimise the facades so that adequate natural light is maintained, whilst the solar gains and associated cooling loads are reduced, providing a more comfortable internal environment for occupants;
- iii. The thermal insulation standards will exceed the Building Regulation standards to limit the heat loss through the buildings fabric;
- iv. Ventilation for the residential floorspace will be provided by localised Mechanical Ventilation Heat Recovery (MVHR) (in combination with natural ventilation systems). Whilst non-residential floorspace will be served by localised Air Handling Units (AHUs);
- v. Low energy light fittings will be installed both internally and externally to reduce energy consumption, and daylight sensors and dimming will be included where possible at perimeter commercial zones; and
- vi. Electrical and mechanical systems will be tightly metered and controlled by BMS enabling energy use to be tracked and opportunities for improvements.

9.17 These measures would ensure that the 'Be Lean' performance would achieve a 10% reduction when compared against the Building Regulations requirements.

9.18 Secondly, developments are expected to consider adopting sustainable design and construction measures and prioritise decentralised energy as part of the 'Be Clean' requirement.

9.19 In accordance with policy 5.6 of the London Plan, an investigation into the feasibility of connecting to an existing or proposed district network has been undertaken but in terms of the Proposed Development it has been agreed with the City Council that this is not possible. This is because the closest heat network is within Pimlico, which is at the other side of the railway lines running in to Victoria Station which prohibits any possibility of connecting to this network.

- 9.20 In terms of CHP, CHP plant generates harmful nitrogen dioxide and sulphur oxide emissions which are detrimental to local air quality. As this is a residential-led development within a largely residential area and that Building A will accommodate vulnerable older people, the pollutants generated by CHP should be avoided.
- 9.21 Furthermore, gas-fired CHPs are no longer offering high carbon savings over electric systems as a result of the more up to date SAP 10 emission factors. Therefore, no decentralised system is proposed so there are no 'Be Clean' energy savings.
- 9.22 Thirdly, developments are required to adopt renewable technologies where feasible which is known as the 'Be Green' section of the energy hierarchy. Cundall undertook an analysis of a range of Low and Zero Carbon technologies to determine which would offer feasible carbon emissions savings. As a result of this the following measures are included as part of the Proposed Development:
- i. A centralised low temperature heat loop would connect all domestic type spaces. This would be achieved by the central generation of thermal energy for the heat loop by air source heat pumps (ASHPs). Then at a localised level, the heat will be upgraded using Water Source Heat Pumps (WSHP) in each dwelling. This will deliver space heating, cooling and domestic hot water ('DHW') demands;
 - ii. For the non-residential floorspace, space heating and cooling will be provided by localised Variable Refrigerant Flow (VRF) systems. This system transfers heat from one location to another using refrigerant which saves energy as it can be accurately matched to the required heating and cooling loads; and
 - iii. A photo-voltaic array will be installed on the roof of Building B1 to maximise on-site energy generation.
- 9.23 This range of energy saving and energy generation measures would result in an annual carbon saving of 532 tonnes when compared against Building Regulation requirements and on this basis the Proposed Development would achieve a 51% improvement in terms of carbon usage against the relevant Building Regulations.
- 9.24 Although the Proposed Development exceeds the 35% on-site target, Part C of the Intend to Publish London Plan policy SI 2 requires major developments to be net zero carbon. Should this policy be in use at the point when this application is determined, a carbon offset

payment through the Section 106 agreement, calculated in accordance with policy, would be required to address the remaining carbon usage.

Whole Life Carbon Assessment

- 9.25 Policy SI 2(F) of the Intend to Publish London Plan states that development proposals that are referable to the Mayor should calculate whole life-cycle carbon emissions through a Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. The supporting text explains that the assessment should consider the total life cycle approach including its operational emissions (i.e. those associated with day to day residential and commercial uses), its embodied emissions (i.e. those associated with raw material extraction, manufacture and transport of building materials and construction) and emissions associated with maintenance, repair and replacement.
- 9.26 Section 1.8 of the GLA Whole Life-Cycle Carbon Assessment Guidance (April 2020) states that a set of WLC benchmarks have been developed, which applicants will be asked to compare against their own results as part of their WLC assessment and which the GLA will refer to in its review of these assessments.
- 9.27 In line with Section 2.9 of the GLA Whole Life-Cycle Carbon Assessment Guidance, the assumed building life expectancy has been taken as 60 years – though the Proposed Development has been designed to last significantly in excess of this.

Assessment

- 9.28 In accordance with Policy SI 2 of the Intend to Publish London Plan, a Whole Life Carbon Assessment forms part of Cundall's Energy Statement. This assessment sets out total energy usage over a standard 60 year lifecycle and provides comparison assessments against various alternate proposals ('do nothing', 'light touch refurbishment' and 'refurbishment & extension') which would have all retained the existing structures and therefore also takes in to account the energy which is already embodied within these structures.
- 9.29 To determine the carbon baseline, an early design stage Whole Lifecycle Carbon Assessment was carried out using design information at the start of the project, default

materials recommended by the RICS professional statement (November 2017) and the component life spans recommended by the RICS professional statement.

9.30 The early design stage proposal would have resulted, over a standard 60-year life cycle, in circa 82,000 tonnes of carbon usage. Following this, a series of carbon reduction methods have been incorporated into the design to reduce the life cycle carbon impact of the Proposed Development – these include the following:

- I. Concrete to use less energy intensive Ground Granulated Blast-furnace slag cement replacement where possible;
- II. Use of a raft foundation rather than a piled foundation;
- III. Heavy materials such as bricks, concrete and stone to be sourced locally where possible;
- IV. The concrete slabs have been reduced in depth from 250mm to 225mm to reduce concrete usage;
- V. Timber combi window frames would be used rather than aluminium products;
- VI. Bricks would be hand laid which removes the need for energy intensive precast concrete.

9.31 For carbon used to practical completion, the findings show the carbon reductions identified would result in a carbon saving of circa 20%. As a result, the carbon used to complete the Proposed Development (833 kilograms of carbon per sqm) would be lower than the GLA's WLC benchmark (850 kilograms of carbon per sqm).

9.32 In terms of carbon used within the operational lifespan of the new buildings, the Cundall assessment, at this stage, includes several options which could reduce carbon usage by 20% when compared to the initial early design baseline – which would be 411 kilograms of carbon per sqm. Whilst this does not fall under the GLA's WLC benchmark (400 kilograms of carbon per sqm), further reductions are to be expected within the detailed design stage when the material specifications are developed further, which could enable the Proposed Development to also be lower than this GLA benchmark. Furthermore, the guidance states that the benchmarks are to be used as a guide, and that over time, as more data is collected by the GLA and by industry more widely, these benchmarks will evolve to become more accurate and comprehensive.

- 9.33 A study to compare the Whole Life Carbon emissions on an area basis between the existing situation, a light touch refurbishment, a refurbishment & extension scheme and the Proposed Development has been undertaken by Cundall. This covers all energy usage include carbon embodied within the existing buildings, new materials which would be required and general day-to-day energy use.
- 9.34 The results are summarised in Table 15 of Cundall's Energy Statement which on a per square metre basis illustrates that whilst in year 1 the embodied carbon is low for the 'do nothing' option and the 'light touch refurbishment' option, that the annual operational carbon emissions are much higher for these approaches when compared to the Proposed Development. Despite the loss of embodied carbon as a result of substantial demolition, the savings made by progressing with construction which seeks to use less energy intensive materials, providing energy generation on-site and using less energy on a day-to-day energy would mean that over a standard 60 life cycle that the Proposed Development would result in less carbon emissions on a per square metres basis than the other three options considered. In terms of a direct comparison the Proposed Development, which would use 1,842 kilograms of carbon per sqm over the full life span, is significantly lower than the 'light touch refurbishment' option, which would use 3,903 kilograms of carbon per sqm. On this basis, the carbon 'pay back' of the Proposed Development compared to a light touch refurbishment, would be circa 16-17 years.
- 9.35 Based on the assessment carried out, the Proposed Development is considered to accord with national, regional and local planning policies in terms of making the best use of this urban land and its approach to energy usage and sustainability.

10. Planning Consideration – Townscape, Views and Heritage

Townscape and Views

- 10.1 Intend to Publish London Plan policy HC3 states that Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.
- 10.2 Policy S26 of the City Plan states that strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or insensitive development. Where important views are adversely affected by large scale development in other boroughs, the council will raise formal objections.
- 10.3 The effect of the Proposed Development on local townscape views has been considered in detail in the Townscape, Visual Impact and Heritage Assessment included within the Environmental Statement. 25 views have been considered using verified views. The townscape assessors conclude that the Proposed Development will not have an adverse effect on any of the townscape views tested. In 15 cases, they consider that the proposal would lead to improvements. One of the major townscape benefits the Proposed Development offers is the opening up of views of the Grade I listed Church of St Barnabas from Ebury Square – shown in View 24 of the visual assessment – and the new route through the Site.
- 10.4 The massing and architectural treatment of the Proposed Development has been designed to complement the rich and historically significant existing and new emerging townscape character in the vicinity of the Site. The scheme is context led, and would successfully knit new blocks into the established, high-quality and historically sensitive townscape. It would reinforce the gateway to the Belgravia Conservation Area through the construction of a significant high-quality marker at the corner of Pimlico Road and Avery Farm Row in Building B, with influences in material and form derived from the nearby conservation area. The Proposed Development has been designed to ensure visual and physical permeability. The activation at ground floor gives a sense of activity which draws people in.

- 10.5 The scale of the Proposed Development will complement the existing and emerging height and massing in the local area, while drawing from nearby forms, ornament and materials ensuring it is suitably contextual in its design.
- 10.6 The Proposed Development has been conceived as an integral part of the townscape of the locality. It will have a distinctive character and sense of place, drawn from analysis of the specific location of the Site.

Heritage

- 10.7 Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.8 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that the in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.9 Furthermore, section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 goes on to state that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 10.10 Under paragraph 189 of the NPPF, in determining applications, Local Planning Authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 10.11 Paragraph 192 of the NPPF states that in determining planning applications, Local Planning authorities should take account of:

- i. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- ii. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- iii. the desirability of new development making a positive contribution to local character and distinctiveness.

10.12 Paragraph 193 of the NPPF states that, “when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm to its significance.”

10.13 Paragraph 195 of the NPPF states that proposals that would lead to substantial harm or loss of significance of a designated heritage asset will be refused consent “unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that the following apply:

- “the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.”

10.14 When proposals lead to “less than substantial harm” to the significance of a designated heritage asset, then the NPPF requires that harm to be weighed against the public benefits of the proposals and for the applicant to endeavour to secure the heritage asset’s optimum viable use (paragraph 196).

10.15 Regarding undesignated heritage asset, Paragraph 197 of the NPPF states the following:

“The effect of an application on the significance of a non designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

10.16 Policy 7.8 of the London Plan states that *“development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology... Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.”*

10.17 London Plan Policy 7.9 states that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration.

10.18 Paragraph 7.29 emphasises that:-

“Ensuring the sensitive management of London’s historic assets, in tandem with the promotion of the highest standards of modern architecture, would be key to maintaining the blend of old and new that gives the capital its unique character.”

10.19 Intend to Publish London Plan policy HC1(C) states that development proposals affecting heritage assets should conserve their significance, by being sympathetic to the assets’ significance and their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

10.20 At a local level, City Plan Policy S25 recognises Westminster’s historic environment and requires that heritage assets are conserved including its listed buildings and conservation areas.

10.21 City Plan Policy S26 requires that local views including those of metropolitan significance will be protected from intrusive or insensitive development. UDP Policy DES15 states that permission will not be granted for developments that have an impact on views from the following:

- i. listed buildings;
- ii. landmark buildings;
- iii. important groups of buildings;
- iv. monuments and statues;
- v. parks, squares and gardens;

- vi. the Grand Union and Regent's Canals;
- vii. the River Thames.

- 10.22 Saved policy DES 9 of the UDP states that planning applications for the alteration or extension of unlisted buildings in a Conservation Area should not have an adverse effect on the area's recognised special character and appearance, including intrusiveness with respect to any local views.
- 10.23 Saved policy DES 10 of the UDP states that planning permission will not be granted for development which adversely affects the immediate or wider setting of a listed building.
- 10.24 The Site features a number of designated heritage assets, namely: two mid-19th century residential blocks known collectively as Coleshill Flats; a late-19th century public drinking fountain; an early 20th century civic obelisk; and two 1935 'K6' telephone kiosks.
- 10.25 The Site is also within the setting of the Belgravia Conservation Area, a designated heritage asset.

Significance

- 10.26 A detailed assessment of the significance of the listed and unlisted structures within the Site is included in the Historic Buildings Report prepared by Donald Insall Associates. A summary is provided below.
- 10.27 An assessment of the significance of the Belgravia Conservation Area is included within the Townscape, Visual Impact and Heritage Assessment (TVIAH) in the Environmental Statement. This report also considers the significance of heritage assets that have the potential to be affected (through changes to their setting) in the area surrounding the site.

Belgravia Conservation Area

- 10.28 The TVIAH notes that the appearance of the early 19th century core of the Conservation Area is characterised by its regularity, uniformity and formal grid pattern with stucco terraces, spacious streets, crescents and gardens. The consistent use of materials and repetition of classical architectural detailing, is noted as contributing to a high degree of visual uniformity and coherence within the heart of the conservation area. Significance is

also noted as arising from the area's association with the Grosvenor family, and for its evidence of the western expansion of London. The report notes that, in the area in which the site is located, the streetscape differs from that in the heart of the conservation area as it is not orthogonal and dates from a later period.

Coleshill Flats (Grade II)

- 10.29 The Coleshill Flats (Grade II) - Coleshill Flats were erected in 1869-71 by the Improved Industrial Dwellings Company (IIDC) to provide model dwellings for low-income artisans working in Pimlico. The significance of Coleshill Flats, which survives relatively intact, relates to its historical associations with the IIDC's housing programme of the 1860s and 1870s. The flats also make a positive contribution to the pervading residential character of the Belgravia Conservation Area and the wider townscape.

Marquess of Westminster Memorial Drinking Fountain (Grade II)

- 10.30 The Marquess of Westminster Memorial Drinking Fountain was erected in 1871 by the Metropolitan Drinking Fountain and Cattle Trough Association, on behalf of the Marchioness of Westminster to commemorate her husband Richard Grosvenor, 2nd Marquess of Westminster (1795-1869). The fountain survives largely intact but has seen poor quality and detracting repairs to its base, the part-loss of its crowning urn, the loss of its spouts and the loss of its function, defects to its decorative mosaic decorations, and slight weathering to its decorative stonework. Its significance relates principally to its historical associations and its ornate Italian Renaissance design, but it also has communal and historic value as a structure provided philanthropically for the urban poor.

Arnridd Johnstone Obelisk (Grade II)

- 10.31 The Arnridd Johnstone Obelisk, originally named 'Children's Group', was designed and executed in the mid-1920s by Swedish sculptor, Arnridd Johnstone. The obelisk is a handsome piece of modern art but has poorly weathered and lost its inscriptions to a large extent. The significance of the Obelisk relates principally to its architectural and historic interest as a piece of interwar civic art, designed and carved by a renowned mid-20th century sculptor, and its relationship with nearby social housing units provided for families.

K6 Telephone Kiosks (Grade II)

- 10.32 The pair of K6 telephone kiosks in Orange Square are relatively intact and feature domed roofs, unperforated crowns to top panels and margin glazing to windows and doors. First designed as a prototype in 1935 by eminent architect Sir Giles Gilbert Scott (1880-1960), the significance of the kiosks relates principally to their special architectural design interest as instantly recognisable and celebrated features of the streetscape.

Walden House (unlisted)

- 10.33 Walden House is subject to a Certificate of Immunity from Listing, and was built as flats in 1924 by the City of Westminster to designs by architects Messrs Joseph on Grosvenor land. It provided flats for families with children. The building is still used for its original purpose but has modern uPVC windows and new lift overruns. It does not make a positive contribution to the streetscene in Pimlico Road and Ebury Square because of its modest design quality and the lack of activation and rhythm on the street, but its original purpose to house the urban poor has some historic significance.

Cundy Street Flats (unlisted)

- 10.34 Cundy Street Flats were granted a Certificate of Immunity in 2013 which was renewed in 2018 for five years. The buildings were developed for housing to designs by TP Bennett & Son between 1950 and 1952. The buildings were designed as four blocks on cross-shaped plans, set at 45 degrees to the street, with landscaping and car parking. The buildings remain in their original use but have been reconfigured internally. Their design is old-fashioned for their date but is well considered. The layout of the estate however, set at an angle to the historic streets around it, disrupts the enclosure of Ebury Street, and this compromises the setting of historic buildings. The buildings make a modest positive contribution to the setting of the street and the conservation area as far as their architectural quality is concerned but detract in terms of their layout.

Proposals

- 10.35 The proposals would see a comprehensive redevelopment of Walden House and Cundy Street Flats with new buildings for residential uses at upper floors and a mix of active uses at ground and below ground level, with a new alignment to re-introduce the lost street

enclosure on Ebury Street, and new landscaped routes through the site. The following paragraphs describe the proposals in more details and set out the impact on the historical significance.

Proposals for Coleshill Flats and their impact

- 10.36 In respect of the Coleshill Flats, the eastern shop attached to the flank elevation of the Pimlico Road terrace at 20a Pimlico Road would be removed behind its decorative shop front, resulting in the demolition of modernised interiors and the shop's rear and flank walls and roof. The east facing main flank elevation of the terrace would be abutted by a new block which would be set back from the building line of the listed building.
- 10.37 The rear basement elevations of both terraces would be altered in some localised areas to create additional access into these buildings.
- 10.38 In the Ebury Street block, this would result in the adaptation of two modern windows in closet wings into doors where it appears that originally doors were present, and where it is proposed to introduce frames and door leaves matching surviving originals. Two modern doors would be replaced with doors to historic patterns, one blocked window would be re-opened, and two modern door openings would be converted into windows, according to the presumed original pattern. Otherwise there would be the removal of redundant clutter and services from the elevation. The historic railings which enclose the basement courtyards would be adapted to form a double gate in the central courtyard. The steps leading from ground floor level to the basement lightwell at the west end of the block would be removed and new steps with salvaged handrails formed in a similar location. The basement lightwell and courtyards would receive a new brick floor finish, and there would be lift access via a new platform lift at the east end.
- 10.39 In the Pimlico Road block, there would also be a reinstatement of two doors in place of modern windows, and replacement of two modern doors in historic patterns, along with the removal of clutter and security bars, and the removal of modern paint on brickwork where this is possible without causing damage. The treatment of stairs would be similar to the Ebury Street block, with three proposed staircases into the lightwell in the place of the existing two. There would be a lift added to the east end of the lightwell to create step free access. The two larger basement courtyards would see their historic gates adjusted to become double gates, and the basement lightwell and courtyards would receive a new

brick floor finish. The courtyard between the blocks would be re-landscaped with new planting and hard surfaces. The modern tall brick wall to Orange Square would be rebuilt to a bespoke design to form an entrance. All outbuildings in the courtyard, including bike sheds and the post-war caretakers building, would be removed.

- 10.40 No internal works are proposed to the individual units as part of this planning application. Separate listed building consent applications will be made for any necessary changes required to accommodate tenants fit out.

Impact:

- 10.41 As set out in the accompanying report prepared by Donald Insall Associates, a number of elements of the proposals relating to the Coleshill buildings constitute enhancements which will strengthen or complement the significance of the listed buildings and which are therefore beneficial. These are the demolition of modern outbuildings and boundary wall and their replacement with well-considered landscaping, and the reinstatement of basement rear doors where these have been lost, along with the removal of modern clutter to rear elevations including security bars and service ducts. These elements are all public environmental benefits.
- 10.42 Other elements would result in the loss either of original fabric or original design, albeit on a small scale, including where railings are to be adjusted, where the rear of the shop on Pimlico Road is to be lost. Due to their minor scale their impact would be very low and constitute harm at the low end of the less-than-substantial category, and the loss of the rear shop is directly outweighed by the provision.

Relocation and Repair of the Obelisk and Drinking Fountain

- 10.43 Also proposed is the relocation and repair of the drinking fountain (Grade II) to a nearby location on Avery Farm Row, and the relocation and repair of the obelisk (Grade II) to a new courtyard setting within the Site on Five Fields Row. The position of the listed telephone boxes on Orange Square would also change very slightly.

Impact

- 10.44 The obelisk would be carefully dismantled into its individual components, labelled, packaged and removed off site into safe storage where it would be repaired; a detailed method statement has been provided by Donad Insall Associates and is submitted with this application. Following construction of the new development along Ebury Street, the obelisk would be placed into a courtyard in front of Building C which would be accessible via a public route from Ebury Street which also connects to Pimlico Road.
- 10.45 Whilst the obelisk would lose its historic setting, it is clear from research that the obelisk was a late addition to Walden House; whilst there is a thematic connection between the two, namely the obelisk depicting children and Walden House accommodating families, such a connection would be re-established in the new development where family accommodation is provided and the residents of Walden House would have the opportunity to move to Building C. Overall, Donald Insall Associates conclude that there would be no harm per se in the relocation. The repair of the obelisk would be an enhancement, and the obelisk's new setting would likely provide better environmental protection through its more sheltered configuration, and it is likely that this will halt or slow the deterioration of the stonework that has occurred to date. This would be a heritage benefit, something which Historic England also considered to be the case within its pre-application response letter dated 13 November 2019.
- 10.46 For the drinking fountain, the proposals are also for relocation, and a method statement is also provided for this by Donald Insall Associates. This specifies the careful dismantling, labelling, packaging and removal offsite followed by repairs, and later reinstatement on the opposite (west) side of Avery Farm Road. The fountain would then be reconnected to the water mains and fitted with spouts replicating those that were lost, and it would be placed on a bespoke pavement whose pattern would centre on the fountain.
- 10.47 The fountain lost its historic setting when the building that formed its backdrop was replaced in the twentieth century, and it was further compromised when it was disconnected from the water mains and fell into disrepair. Donald Insall Associates conclude that the proposals would enhance the fabric of the fountain and this, alongside bringing it back into function, would be heritage benefits. The proposed new location and setting are appropriate and would cause no harm. As part of pre-application consultation Historic England also confirmed that it had no concerns regarding the relocation of the fountain to outside Building B1.

Cundy Street Flats and Walden House

- 10.48 The proposals include the complete demolition of the Cundy Street flats and Walden House.

Impact

- 10.49 As set out in the Historic Buildings Report, the impact of the demolition of Cundy Street Flats and Walden House would result in the loss of two non-designated heritage assets, and this would cause some harm.
- 10.50 For Walden House this harm would be lesser because the significance of Walden House is limited and primarily historic; it relates to the relatively rare provision of social housing at the time, and there is no architectural significance associated with this building. Conversely, Cundy Street Flats are of some architectural quality, and the harm caused by their demolition would be slightly greater than for Walden House. However, these buildings, whilst handsome, also detract from the setting of Ebury Street and the Belgravia Conservation Area due to their irregular alignment.

Belgravia Conservation Area

- 10.51 In respect of the Belgravia Conservation Area, the TVIAH concludes that the Proposed Development will not have an adverse effect or cause harm. It will reinforce the entrance to the Conservation Area through the construction of a significant marker, of first class design quality, at the corner of Pimlico Road and Avery Farm Row in Building B, with influences in material and form derived from the conservation area.
- 10.52 The Historic Building Report, whilst focused upon the effect on buildings within the Site, also notes that the impact of the new development on the setting of nearby listed buildings on Pimlico Road and Ebury Street and, incidentally, the Conservation Area, would be overall beneficial; the re-introduction of perimeter buildings on both streets, and the creation of carefully detailed new buildings in appropriate materials would enhance the setting of these streets. It notes that there would be greater height at the east end of the site by Avery Farm Road, and at the interior of the block, but this height, whilst a change in scale, is located away from sensitive heritage assets, and carefully handled with interesting architecture which would contribute positively to the wider setting of the

Belgravia Conservation Area and listed buildings. In particular, the reintroduction of perimeter buildings would improve the settings of the listed buildings on the north side of Ebury Street, namely nos. 162-170, 172, 174, 182 and 184-188 (all Grade II listed), and 180 Ebury Street (Grade I), as well as the setting of Coleshill Flats (Grade II) on Ebury Street.

10.53 No harm is identified to the Belgravia Conservation Area as a designated asset.

Less than Substantial Harm

10.54 For the listed structures on Site, the above description of the proposals and their impacts identifies a small number of elements of less-than substantial harm to the significance of Coleshill Flats which would arise from the scheme, and some minimal harm to the obelisk. There would be no harm to the drinking fountain.

10.55 The elements of harm have been carefully considered throughout the design development and have been minimised as much as possible. In summary, less-than-substantial harm would be caused by:

- i. the removal of the internally modernised rear shop at 20a Pimlico Road;
- ii. adjustments to original railings in the rear basements at Coleshill Flats; and
- iii. the loss of the obelisk's original context in the setting of Walden House for which it was either designed or chosen.

Other Harm

10.56 The demolition of the unlisted Walden House and Cundy Street Flats would cause some harm because of their complete loss, but also provides an opportunity for the reinstatement of the lost important street enclosure on Ebury Street, and for improved architecture which would enhance the setting of listed buildings and the Belgravia Conservation Area.

10.57 The increase in height, particularly at the east end of Pimlico Road, will be noticeable but cause no harm because of the well-designed architecture of the new buildings, the presence of other tall buildings in the vicinity, including at Buckingham Palace Road, and the low sensitivity of the environment in this area.

Public and Heritage Benefits

10.58 The proposed scheme overall would create a wide range of social, economic and environmental public benefits which would amply outweigh the less-than-substantial harm described above. These benefits are set out in detail within the Principle of Development Section of this report and are summarised below:

- 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%⁸;
- 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;
- 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 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;

⁸ That is, 47% of the habitable rooms in the Class C3 residential accommodation and independent living within Building A.

- 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.

10.59 Specifically, in regard to the redevelopment of Walden House and Cundy Street Flats, environmental heritage benefits include:

- i The recreation of the lost perimeter enclosure on Ebury Street;
- ii The reintroduction of lost historic routes through the site at Elizabeth Place and Clifford Place;
- iii The creation of contextual architecture with appropriate materials and proportions on Ebury Street, Pimlico Road, Avery Farm Road and Cundy Street.

10.60 The works to the listed buildings specifically would bring heritage benefit for those structures, and these are as follows:

- i At Coleshill Flats, the provision of high-quality landscaping in the place of low-grade outbuildings, modern boundary wall and landscaping which compromises their setting;
- ii The reintroduction of openings to original dimensions in the basement rear elevations of Coleshill Flats, and the replacement of modern doors with more sympathetic joinery;
- iii The removal of clutter from the same elevations;
- iv Repairs to the obelisk and its relocation to a more sheltered setting with the potential to protect it better from the weather;

- v Repairs to the water fountain and its reconnection to the water mains and reintroduction of its original function;
- vi Repairs to the listed telephone boxes on Orange Square.

The Harms vs Benefits Balance

10.61 The Historic Buildings Report concludes that there would be some harm arising from the demolition of Walden House and Cundy Street Flats, and to two designated heritage assets, namely Coleshill Flats where some fabric would be lost and adapted, and the obelisk which would lose its historic setting. This harm enables a wider, beneficial scheme for this Site to be achieved. The benefits which would arise specifically for the historic environment and the designated heritage assets on the site and in its setting are substantive and outweigh the less-than-substantial harm, as do the scheme's wider socio-economic and environmental benefits.

Summary

- 10.62 **The works to the listed buildings bring many heritage benefits and create very little harm to the significance of heritage assets: the Grade II listed mid-19th century terraced artisan housing blocks at Coleshill Flats would be enhanced to the rear, but would lose a secondary element of one shop unit and, in addition, would have its historic railings adapted; the Grade II listed 1920s obelisk in the courtyard of Walden House would be repaired and relocated to a nearby, more sheltered public setting which has the potential to enhance its longevity; and the Grade II listed mid-19th century drinking fountain would be repaired and relocated to a close-by site where it would be made to function once more for its intended purpose. The opportunity would also be taken to repair the listed telephone boxes.**
- 10.63 **The impact on fabric and heritage significance of the designated assets on Site is largely beneficial, with small areas of minimal and localised harm which would be comfortably outweighed by wider public benefits and heritage benefits.**
- 10.64 **The proposed replacement of two modestly significant unlisted 20th century buildings, Walden House and Cundy Street Flats, would cause some harm but would allow the wide-ranging public benefits of a new sustainable housing development**

with active uses made possible. This new development would also provide some heritage benefits, namely a repair to the disrupted street enclosure on Ebury Street, and the recreation of lost historic streets inside the block. No harm would be caused to the Belgravia Conservation Area.

10.65 For these reasons, the proposals comply with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; paragraphs 193, 196 and 197 of the NPPF, and Westminster’s local plan as set out at paragraphs 10.7 to 10.25 above.

Archaeology

10.66 The NPPF requires LPAs to identify and assess the significance of any heritage assets that may be affected (Paragraph 187). Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, LPAs should require an appropriate desk-based assessment and, where necessary, a field evaluation (Paragraph 189).

10.67 London Plan policy HC1 states that development proposals should avoid harm to assets of archaeological significance or minimise it through design and appropriate mitigation. Development should make provision for the protection of significant archaeological assets and landscapes.

10.68 Saved UDP Policy DES 11 states that permission will be granted for development where, in order of priority:

- i. “all archaeological remains of national importance are preserved in situ;
- ii. remains of local archaeological value are properly evaluated and, where practicable, preserved in situ; and
- iii. if the preservation of archaeological remains in situ is inappropriate, provision is made for full investigation, recording and an appropriate level of publication by a reputable investigating body”.

Assessment

10.69 There are no statutorily designated archaeological remains recorded on or near to the Site. The Site is within the Pimlico Archaeological Priority Area (APA), a landscape scale zone

where there is existing evidence for buried remains of archaeological interest. In early periods the area of the Site, close to the confluence of the River Westbourne and River Tyburn with the Thames, was probably a seasonally flooded meadowland environment, and it continued as a predominantly low lying and sparsely populated marshy area until the 19th century, when it was developed, primarily as terraced houses.

10.70 As a result of past construction, particularly deep excavations for basements, any archaeological remains present on the Site are likely to have been truncated and fragmented. Geotechnical investigations undertaken at the Site have recorded made ground over truncated natural gravel, with archaeological potential limited to remains of foundations and possible agricultural ditches, of local heritage importance / value. Any alluvial deposits in the southern part of the Site associated with the former floodplain may contain preserved pollen or other environmental evidence, also of local heritage importance / value.

10.71 **The archaeological report concludes that removal of such remains by the proposed works could be mitigated through a programme of archaeological investigation and recording, to reduce the environmental effect to a minor adverse level. Accordingly, the proposals are considered to comply with London Plan and City Council policy.**

11. Planning Consideration – Urban Design

- 11.1 This section assesses the design of the Proposed Development, specifically:
- a) Layout and Scale
 - b) Heights
 - c) Design, typology and materials
 - d) Basements
 - e) Fire Safety
- 11.2 This section does not consider the design of the proposed residential units – this is assessed with Chapter 14 of this Town Planning Statement. This section to be read alongside further detail on the development design set out within the submitted Design and Access Statement.
- 11.3 As set out in chapter 6 of this Town Planning Statement, the design of the Proposed Development has evolved through extensive consultation with the local community, City Council officers and councillors, and other stakeholders and statutory bodies including the GLA. Significant amendments have been made to the design, layout and quantum of development as a direct result of these pre-application discussions.
- 11.4 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 124 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 11.5 At paragraph 127, the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.
- 11.6 Paragraph 131 of the NPPF states that local planning authorities should give great weight to outstanding or innovative designs which help to raise the standard of design in the area and are sensitive to local character and the surrounding environment.

- 11.7 The NPPG on Design, which supports section 7 of the NPPF, states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area: “Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits)”.
- 11.8 The NPPG states that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:
- i. be functional;
 - ii. support mixed uses and tenures;
 - iii. include successful public spaces;
 - iv. be adaptable and resilient;
 - v. have a distinctive character;
 - vi. be attractive; and
 - vii. encourage ease of movement.
- 11.9 The Intend to Publish London Plan policy D1-D3 of the London Plan apply to the design and layout of the development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, legible movement routes and the importance of designing out crime by maximising the provision of active frontages.
- 11.10 The Intend to Publish London Plan London Plan policy D4 states that the maximum detail appropriate for the design stage is provided to reduce the need for later design amendments and to ensure design quality is maintained.

11.11 City Plan Policy S28 requires that development proposals should deliver high quality design and architecture: Paragraph 2.55 of the City Plan states that:

“Development must incorporate exemplary standards of sustainable and inclusive urban design and architecture. In the correct context, imaginative modern architecture is encouraged provided that it respects Westminster’s heritage and local distinctiveness and enriches its world-class city environment.

Development will:

reduce energy use and emissions that contribute to climate change during the life- cycle of the development; and

ensure the reduction, reuse or recycling of resources and materials, including water, waste and aggregates.

This will include providing for an extended life-time of the building itself through excellence in design quality, high quality durable materials, efficient operation, and the provision of high quality floorspace that can adapt to changing circumstances over time.”

11.12 Saved Policy DES 1 of the UDP requires that development be of the highest standards of sustainable and inclusive urban design and architectural quality. The development should use high quality materials and should respect the character of the existing buildings and the surrounding area.

Assessment

11.13 The submitted Design and Access Statement outlines the overall design principles and provides a detailed review of the approach to the Proposed Development

11.14 The architects DSDHA have designed a scheme based on a number of key principles. These include:

- i To design a coherent mixed-use scheme which is more open and inclusive and delivers new homes for a range of people with activated ground floor uses;
- ii To create a new attractive destination for the local area with a retail mix which allows residents to reach daily amenities easily;

- iii To deliver a new community space;
 - iv To ensure high architectural quality standards and demonstrate innovative design solutions which respond sensitively to the existing wider heritage and urban framework;
 - v To achieve the highest possible standards of energy efficiency to reduce carbon emissions and ensure a sustainable new development;
 - vi To repair the streetscape and create distinct new addresses on Ebury Street, Cundy Street and Pimlico Road;
 - vii To open up new public pedestrian routes through the site;
 - viii To create a catalyst to regenerating Orange and Ebury Squares as active and attractive public spaces.
- 11.15 The overarching objective is to create a new development which responds to its unique location and surrounding context, and to create a high-quality environment for residents, workers, visitors, and neighbouring residents through sensitive, contemporary architecture and design.
- 11.16 The overall design principles ensure a coordinated and consistent approach across the site, with the proposed scheme exemplifying the highest quality urban designed. The Proposed Development represents sustainable development in accordance with the NPPF and complies with the London Plan and local planning policy and guidance.

a) Layout and Scale

- 11.17 The Site is located between Ebury Square and Orange Square on an important east-west route from Victoria to Chelsea. The layout and massing of the Proposed Development has been designed to successfully knit together the townscapes of the surrounding area, to repair the streetscape and create distinct new frontages on Ebury Street, Cundy Street and Pimlico Road.
- 11.18 The scheme is comprised of three buildings with their own front doors providing street presence and responding uniquely to their distinct addresses. The following paragraphs summarise how the proposals relate to the surrounding streets.

A New Frontage to Ebury Street

- 11.19 Building A is a well-proportioned mansion building that creates a dignified frontage to Ebury Street, reinstating the historical building line. The prevailing four storey datum of the street established by the Coleshill Flats is respected. Building A has a setback attic and mansard roof to provide animation to the upper levels.

Elevations on Ebury Street

- 11.20 On Ebury Street, Buildings A and C respond to the residential scale and character of the street and the proposed massing follows the existing datum heights of the Coleshill Flats. The buildings have been given a distinctly different architectural treatment in order to help break up the massing on the street.

Activating Ebury Square Gardens

- 11.21 Building B1 is a grand new building addressing Ebury Square. The entrance is composed on axis with the Gardens and is framed with a view to an internal landscaped courtyard beyond. The building turns the corner onto Avery Farm Row, where a new generous public space is provided, with the scale of the building then dropping to reflect its context on Pimlico Road.

Elevations on Cundy Street

- 11.22 Building A, on Cundy Street, mediates between the character and lower scale of Ebury Street and the taller buildings on Ebury Square. Cundy Street, with setbacks proposed both where Building A1 and A2 meet, and at significant levels of transition Building B responds to the formal setting of the Square, with its axial entrance to the residential lobby.
- 11.23 The Senior Living entrance is located on Cundy Street to provide an active frontage and enhance the quality of public realm, in what might otherwise be considered the rear part of the Site.
- 11.24 Both Buildings A and B are setback at the upper levels, picking up established datum lines of neighbouring buildings and reducing the visual impact when seen from key townscape viewpoints.

Elevations on Pimlico Road

- 11.25 On Pimlico Road, the buildings have been carefully designed to step up from Building B3 to B2 and B1, smoothing the transition between the lower buildings to the west of the site and the taller buildings to the east. As well as stepping in height, the three components that make up Building B are expressed as distinctly different 'buildings' with variation of architectural expression
- 11.26 Building B3 responds to the character and key datum lines of the adjacent Coleshill Flats, setting back in plan to ensure that the corner of the Coleshill Flats can still be seen when viewed from the street.
- 11.27 Building B2 is expressed with a series of bays offering articulation, breaking down the massing and providing balconies within the recesses. At the upper levels the buildings steps back at seventh floor level and a mansard roof at the eighth floor.
- 11.28 Building B transitions between the scale of Buckingham Palace Road and the lower properties to the west on Pimlico Road. Building B1 is highly articulated with brick arches framing recessed balconies that enjoy the generous views either over Ebury Square or south towards Ebury Bridge. At the base of the Building B, the relocation of the Grade II listed Marquess of Westminster Memorial Drinking Fountain (Grade II) to sit in the newly extended public realm, paired with the introduction of new trees, further enhances the visual amenity of this area.

Views of the Spire of the Church of St Barnabas

- 11.29 Creating visibility of the spire of the Church of St Barnabas when entering Elizabeth Place from Ebury Square has been a fundamental ambition throughout the development of the masterplan. The spire is an important local landmark and wayfinding device and creating this visibility embeds the development within the urban grain. As such the layout of the scheme has been designed so that within the newly proposed public route from Ebury Square Gardens, an urban visual connection has been maintained with the spire of the Church of St. Barnabas in view. As such, the massing of Building B3 has been carefully sculpted to create this new local view. Historic England commented as part of pre-application consultation that it welcomed the opening up of this new view of the spire of the Church of St Barnabas given its status as an important local landmark.
- 11.30 Building C is uniquely positioned, addressing Ebury Street, forming a gateway to the newly created pedestrian route - Five Fields Row - and being located at the heart of the development on Elizabeth Place and Elizabeth Place Gardens. On approach from Orange

Square Building C provides an important backdrop, establishing a new relationship with the Coleshill Buildings.

- 11.31 Development of the layout and massing has been informed by and understanding of the specific constraints; the building is positioned, and the massing sculpted to minimise the impact on the Coleshill Buildings, both in terms of loss of privacy and daylight
- 11.32 The building form also ensures that the proposed new apartments receive the maximum amount of daylight possible, as well as maximising the number of dual aspect apartments. The split massing on the upper levels ensures that the residents of Building A have a view towards Orange Square, while providing additional daylight to their shared podium garden.

Elizabeth Place

- 11.33 Massing along Elizabeth Place sets back and recedes on the Eighth Floor, sloping in its geometry on the Ninth Floor. This receding roof line minimises the visual impact when approaching Cundy Street Quarter while bringing maximum daylight into the Senior Living Courtyard.

Summary

- 11.34 The proposed position of each building has been carefully considered taking account of orientation, views, daylight and sunlight within the Site and the surrounding context. The development has been carefully designed in the round taking into consideration the scale and character of each street it addresses, being mindful of the impact of the Belgravia Conservation Area, having respect for the adjoining grade II listed buildings, and assessing the scheme from a wide range of townscape views.
- 11.35 These criteria and local relationships suggested a gradual increase in height away from the existing buildings at the south and west, locating the buildings of greatest height along Ebury Square and at the centre of the Site. These factors informed the final arrangement and massing of all buildings, with the lower massing located along Ebury Street in order to relate to the character of the Belgravia Conservation Area and the listed Coleshill Flats. Similarly, along Pimlico Road the proposed massing relates with the listed Coleshill Flats and steps to become taller along Avery Farm Row and Ebury Square. The proposed massing includes setbacks on the upper floors that creates receding roofscapes that respond to the surrounding context.

Permeability

- 11.36 In addition, to improving the street presence and repairing the streetscape, the urban structure creates a clear framework of routes through the site in order to ensure permeability and tie the Site to the surrounding area. The layout of the three buildings creates a diversity of spaces and character areas connected by a clear framework of routes which provide parameters for the built form, which respond appropriately to the local context.
- 11.37 Elizabeth Place is at the heart of the development re-creating the historical link between Orange and Ebury Squares and encouraging pedestrian movement. To increase permeability of the site, Five Fields Row and Clifford's Row were introduced and look to reinstate historic routes through the site. Five Fields Row is a new passage between Building A and C connecting Ebury Street to Elizabeth Place at the heart of the development. Furthermore, it offers a connection to Pimlico Road via the proposed Clifford's Row passage. These new pedestrianised routes are supported by active frontages, provided by a mix of retail uses at ground floor level, which will enhance the offer already available along Orange Square and Pimlico Road. These active routes will bring additional life to the heart of this new community.
- 11.38 The ground floor layout is designed to maximise active frontage and create a vibrant mix of uses. The retail of Orange Square is extended along Ebury Street and Pimlico Road, as well as lining Elizabeth Place - the new pedestrian route through the site. Retail uses have been strategically located on corner locations, to create character and identity as well as encouraging movement through the site. The exception to this is Ebury Street / Cundy Street corner that is occupied by senior living activities that best match the residential activity of the Belgravia Conservation Area. The majority of Ebury Street is respectfully maintained as a residential area. At the centre of the site is the community space and the cinema, these will be the focal point of the development and the cinema is likely to attract visitors from the wider area to the Proposed Development
- 11.39 **The urban structure and layout of the masterplan creates a diversity of spaces and character areas connected by a clear framework of routes which provide parameters for the built form, which respond appropriately to the local context in accordance with London Plan and local planning policy and guidance.**

b) Height

- 11.40 The height of the buildings within the Proposed Development are contextually sensitive to their immediate surroundings, with the positioning of taller or shorter elements based upon the perception of building rhythm in the street or the heritage sensitivity and setting of the given location of the building.
- 11.41 Building A fronts Ebury Street orientated north-west. It extends 6 storeys in height on Ebury Street and responds to the smaller, historically sensitive buildings on the north-western side of the street through to a maximum height of ten-storeys in the centre of the site.
- 11.42 Building B is divided into three parts, Building B1, B2 and B3. B1 is 11 storeys, B2 is nine storeys and B3 is five storeys. B1 acts as a gateway building to the Proposed Development on approach from Ebury Bridge and the east and is the most visible building in the surroundings but is positioned away from historically sensitive areas and buildings. It takes from the massing of the existing Fountain Court in the opposite side of Avery Farm Row which is smaller at nine storeys in height. B2 and B3 gently slope down along Pimlico Road towards the Grade II listed Coleshill Flats, which are six-storey buildings, with additional rooms in the roof and 20 metres high; B3 abuts the Coleshill Flats and is marginally lower at 9.1m and five storeys in height. Building B3 is lowered to not only respond in height to Coleshill Flats massing, but also to open up a new local view along Elizabeth Place towards St Barnabas Church School Spire.
- 11.43 Building C is central to the Site and is seven storeys tall; its height is mostly shielded by the surrounding structures, relying on the enclosed streets that surround the Site to hide this in views. Where it is visible, in views from Orange Square for example, the townscape is not sensitive. The upper storeys of the Ebury Street block were pulled back to give consistent cornice lines that relate to the neighbouring listed Coleshill Flats and visually suppress the height of the building along Ebury Street
- 11.44 Placing the height at the edge of the Site in Building B1 is key to the success of the scheme both in its current setting and cumulatively. Its location, albeit prominent, is not sensitive; it is not within the Belgravia Conservation Area and does not detract from the setting of any listed buildings. It is characteristic of the townscape character observed and assessed within the Victoria Townscape Character Area, which is predominantly well-designed buildings that occupy large footprints and are medium in height and overall scale

– examples include the Victoria Coach Station and the former British Airways Terminal. The changes in heights across the Site in Buildings A and C shield the taller elements from the more sensitive areas through utilising the enclosed streets on the north-western side of the Site.

- 11.45 The proposed heights and mass on the site have evolved during the determination period in response to stakeholder and consultee comments. This has included a reduction in the height of Building B1 by a floor, and alterations to the massing and design of Buildings B2 and B3 as viewed from Pimlico Road.

c) Design, Typology and Materials

Design

Building A

- 11.46 The approach to the design of Building A has always been one of comprehensive understanding and sensitivity towards the local context. From the outset, the building was thought of as being composed of three parts; a building reacting to Ebury Street (Building A1) and the sense and character of the Belgravia Conservation Area, a building along Elizabeth Place (Building A2) that relates to Building B and finally an interlocking piece that adjoins the two on Cundy Street (Building A1 & A2).
- 11.47 These three buildings have a different sense of scale along each of their respective streets, whereby the scale along Ebury Street delicately mirrors the townhouses opposite while along Elizabeth Place and surrounding Ebury Square there is an opportunity to increase in height due to the surrounding context here. The courtyard is raised to the First Floor for improved privacy, security and better opportunity of receiving daylight. Offering the best quality of living spaces and daylight conditions is a key priority, whereby maximising the opening size of the courtyard is improved by the outward rotation of A2 while openings in the First-Floor courtyard space bring daylight into Ground Floor amenity spaces.
- 11.48 Articulation and setbacks are carefully added to break up overall massing and give a greater sense of Building A being composed of several buildings to bring a legible scale to all facades more in keeping with the abutting Belgravia Conservation Area

- 11.49 Dormer roofs are adopted on Buildings A1 and A2 to offer as little impact as possible on surrounding local views by receding as much as possible. The language of the dormer roofs was inspired directly from the existing Georgian townhouses along Ebury Street.
- 11.50 Setbacks and podium spaces all offer opportunities to integrate landscaping and private outdoor amenity spaces.

Building B

- 11.51 The approach to Building B was to re-introduce street facade continuity, to respond to local context and to create more open green space visible from the Public Realm.
- 11.52 The design approach was to divide the building into two, Building B1 at the Ebury Square and Building B2/B3 at Pimlico Road to respond to the two distinctively different characters of Ebury Square and Pimlico Road. Building B2/3 is further divided into Building B2 and B3 to respond in heights to local context
- 11.53 Building B1 is the tallest building in the development, responding to tall Fountain Court and Semley Place across the Ebury Square. Building B3 has been designed to respond in height to the Coleshill Flats massing, to eliminate overlooking from the Coleshill Flats and to open up a new local view along Elizabeth Place towards St Barnabas Church School Spire. Building B2 in form and architecture acts as a bridge between Building B3 and Building B1.
- 11.54 Building B2 has been articulated by bays to increase viewing aspects for residents and to respond in architecture to the Coleshill Flats access galleries. Articulation and setbacks have been carefully added to break up overall massing and give a greater sense of Building B being composed of several buildings. A top floor set back was introduced to improve local townscape views and reduce the building height impression
- 11.55 As a result, Building B comprises three different buildings which each respond to the immediate local context. Shared Amenity spaces have been added to the top of Building B3 with dual views to St Barnabas Church School at Elizabeth Place, and to the Podium with visual connection to Orange Square. Private balconies are located between the bays, at the Podium elevation and at Avery Farm Row.

Building C

- 11.56 The massing arrangement of Building C evolved through a series of iterations that sought to balance residential quality and sensitivity towards the local context and townscape. Overall, Building C is arranged to address two conditions - the street / Ebury Street and the character of the Belgravia Conservation Area; and the interior of the Site and proximity of existing Coleshill Flats.
- 11.57 The different conditions directly influence the height of the massing and datum lines. The upper storeys of the Ebury Street block have been designed with consistent cornice lines that relate to the neighbouring listed Coleshill Flats and visually suppress the height of the building along Ebury Street.
- 11.58 When viewed from Orange Square and Elizabeth Place Gardens, a gap has been introduced to break the massing and allow views through the building and into the interior of the Site.
- 11.59 Several set-backs facing Ebury Street were a result of reducing their visibility from opposite properties.
- 11.60 Roof pavilions have been introduced in order to reduce the perceived scale of the building as a whole. Roof terraces and podium spaces all offer opportunities to integrate landscape and outdoor amenity spaces for residents who will be exposed to some of the best views overseeing Elizabeth Place Gardens and Orange Square.
- 11.61 The proposed Building C abuts the existing Coleshill Flats (Grade II) flank wall following the same street alignment and reinstating the historical streetscape. The new building has been designed with set-backs on the upper floors that respond to the listed Coleshill Flats by exposing the top section of the gable wall and chimney stacks. A small recess on Building C's facade where it meets the existing listed building creates a subtle transition along the street elevation. This existing gable wall does not have any detail as historically it was built as a party wall to terraced houses along Ebury Street. The facade on Ebury Street has been designed using the facade composition elements of the Coleshill Flats. The proposed retail design has been designed to relate to the existing units within the ground floor of Coleshill Flats.

Typology

- 11.62 All of the buildings on the site have been developed from the Mansion Block typology.

- 11.63 The proposed Mansion Block typology results in flexible layouts, with the distinction of buildings responding to context and utilises setbacks and courtyards that, within this scheme, provide opportunities for outdoor amenities, balconies and green spaces. The character of the proposed architecture and public space will introduce a new architectural language for each building to extend and consolidate the character of Belgravia to meet the southern gateway, and high-quality public spaces to residents and visitors to pass through and pause within.

Materials

- 11.64 Within the Cundy Street Quarter, existing local buildings are as much a precedent for the materiality of the future development as contemporary examples that can be found across London or internationally.

Building A

- 11.65 Along Ebury Street, highly articulated brickwork is the primary proposed material in keeping with the local context. At the upper levels a pigmented zinc mansard roof with dormer windows creates a contemporary animated roofscape, referencing both the traditional surrounding roofs, as well as the more decorative roofscape of the Coleshill Flats.
- 11.66 On Cundy Street and Elizabeth Place, Building A2 is expressed with a framework of modular precast/technical stone with a brickwork and precast/technical stone infill as a modern interpretations of bay window details in the local area.
- 11.67 A palette of subtly varying yellow/buff brick is proposed for Building A, in keeping with the gradation from Elizabeth Street to Pimlico Road. Grey precast/technical stone with inset grey brickwork are used on the uppermost level of Building A, forming a distinct roofscape and differentiating from the rest of the massing from townscape views.

Building B

- 11.68 Building B1 proposed primary material is highly articulated mid-red brick in keeping with the local context and brick buildings along Pimlico Road. Pigmented precast is proposed at horizontal elements to add more interest to the facade and respond to stone cornice details present in historical buildings in the local context. Metal elements within the facade, such as balustrades, window frames and upper level pavilion are dark grey. At street level, bronze wrapped hardwood shopfronts are introduced between brick piers. To accent

Residents Lobby at Ebury Square, bronze was introduced at canopy and first floor windows above the main entrance.

- 11.69 Building B2 continues the tonality of Building B1 with the use of a mid-red brick, as well as the arches over the recessed bays referencing the arched windows on Building B1. Light precast/ technical stone horizontal bands respond to the horizontal banding of the Coleshill Flats and Building C.
- 11.70 The light tone of brick used on Building B3 compliments that of the Coleshill Flats. The precast/ technical stone horizontal bands continue the articulation and horizontality of the Coleshill Flats, as well as picking up as they key datum line at the cornice level. The traditional shopfronts mirror those of the Coleshill Flats however the bronze materiality links all the individual elements of Building B.

Building C

- 11.71 A contextual but contemporary, grid based architectural language is articulated in the facades of Building C, with consistent dimensions of brick piers, windows and recesses consistent throughout the different elevations. Complexity is added to the facade articulation through a series of brick-dimensioned recesses whilst keeping a limited and simple material palette. The proposed material palette references the adjacent Coleshill Flats with a light brick tone. The proposed horizontal elements are to be light precast stone offering a subtle tonal change and defining each storey. The tonal consistency of the proposed material palette offers the opportunity to create a highly articulated facade. The entirety of the Ground Floor will be expressed in precast/technical stone, varying from a plain finish to a subtle, precast, rippled texture within the proposed Five Fields Row with set-back wooden framed windows and doors referencing the painted wooden shop units of the adjacent Coleshill's retail units. All metalwork on the upper levels is of a consistent tone, darker in tonality to the surrounding brick.
- 11.72 With the rich context of brick buildings within the local neighbourhood and the adjacent Conservation Area, the Proposed Development utilises modern methods of construction using brick to produce the most sustainable and sensitive material responses suitable to Belgravia. Each building or building segments have their own expressive tone of brick that relates directly to the context and street conditions most immediate to them.

11.73 The proposed scheme responds well to the surrounding context. The use of the mansion block typology and the use of set-backs and different architectural approaches to design ensures the scheme is aligned with its surroundings.

d) Basements

11.74 Policy CM28.1 (A) of the City Plan requires that all applications for basement development should:

- i. demonstrate that they have taken into account the site-specific ground conditions, drainage and water environment(s) in the area of the development;
- ii. safeguard the structural stability of the existing building, nearby buildings and other infrastructure;
- iii. not increase or otherwise exacerbate flood risk on the site or elsewhere,;
- iv. be designed and constructed so as to minimise the impact at construction and occupation stage
- v. safeguard significant archaeological deposits

11.75 A site-wide single level basement would be provided beneath the Site, with two isolated sub-basement elements. The Coleshill Flats basements will retain their existing accesses with lift access provided to the lightwell via Building C in respect of the Coleshill Flats fronting Ebury Street and via a lift to the rear or the newly built 20A Pimlico Road for the Coleshill Flats fronting Pimlico Road.

11.76 The basement beneath Building A and B would provide car-parking, whilst cycle parking, together with space for adequate refuse facilities and building plant would be provided across the site-wide basement.

e) Fire Safety

11.77 Policy D12 of the Intend to Publish London Plan requires that developments proposals must achieve the highest standards of fire safety. Part B of the Intend to Publish policy

D12, states that the development proposal should be submitted with a Fire Statement produced by a third party suitable qualified assessor.

- 11.78 Part B of Intend to Publish London Plan Policy D5 requires that for all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 11.79 A Fire Strategy prepared by JGA accompanies the planning submission and sets out in detail the proposed approach to Fire Safety. The report confirms that the highest standards of fire safety have been met.

12. Planning Consideration – Land Use

12.1 This section assesses the proposed land uses and their acceptability in principle in planning policy terms. It concludes that the proposed mix of uses is acceptable in land use terms and that the uses are of an appropriate scale and balance in line with relevant planning policies.

12.2 This section considers the following land uses:

- a) Residential:
 - i. Housing;
 - ii. Affordable Housing.
- b) Specialist Older Persons Housing;
- c) Town Centre Uses:
 - i. Retail;
 - ii. Leisure;
 - iii. Affordable workspace office / retail floorspace.
- d) Community Use (Class D1).

a) Residential (Class C3)

i. Housing

12.3 The Government's strategic objective as set out in the NPPF is to deliver a wide choice of high-quality homes, to provide opportunities for home ownership and to create sustainable, inclusive and mixed communities (paragraph 50). In order to boost housing supply, applications for housing should be considered against the presumption in favour of sustainable development (paragraph 49).

12.4 Increasing housing supply is one of the Mayor's key strategic objectives which is supported by London Plan Policy 3.3 and table 3.1 which sets out minimum annual housing targets for each Local Planning Authority ('LPA') to meet the total annual target for London of 42,389 homes. Table 4.1 of the London Plan sets the 10 year target for net housing completions between 2019-2029 in the City of Westminster as 9,850 homes. Part B2 of Policy H1 of the Intend to Publish London Plan outlines that boroughs

should optimise the potential for housing delivery on all suitable and available brownfield sites.

- 12.5 Strategic Policy GG4 of the Intend to Publish London Plan sets out that development should ensure that more homes are delivered which meet high standards of design and create mixed and inclusive communities. Strategic Policy GG4 of the London Plan also sets a strategic target that 50% of all new homes being affordable.
- 12.6 Policy H8 of the Intend to Publish London Plan deals with proposals which result in the loss of existing housing and sets out an aspiration that where the loss of existing housing is proposed, new housing should be provided at existing or higher densities with at least the equivalent level of overall floorspace.
- 12.7 At a local level, policy S14 of the City Plan stated that the council will work hard to achieve its borough target as set out in the London Plan. This equates to 985 new homes per annum.
- 12.8 Policy S16 of the City Plan states that the City Council will seek to protect affordable housing floorspace, with an aim to exceed the target of 30% of new homes being affordable. Affordable housing should be provided on site where practical.
- 12.9 Saved policy H3 of the UDP states that the Council will seek to maximise residential use outside the CAZ in order to increase the amount of housing in the City.

Assessment

- 12.10 There are 160 existing residential units within the site as follows:
- 111 private residential flats within the Cundy Street flats;
 - 40 affordable residential flats within Walden House
 - 9 affordable residential flats in the basement of the Coleshill Flats.
- 12.11 In terms of habitable rooms, there are 506 habitable rooms within the existing development.
- 12.12 Walden House provides outdated and undersized accommodation. There are currently 40 units over 2,835sqm GIA of floorspace, resulting in an average unit size of 71 sqm

before allowing for circulation space. The existing accommodation within Walden House has no private or shared outdoor amenity space or lift access. The accommodation is therefore of a poor quality.

- 12.13 The proposals would deliver 163 high quality residential units in Buildings B and C, in addition to the senior living accommodation. In habitable room terms, 484 habitable rooms are proposed, plus those in the senior living accommodation.
- 12.14 There would be a material increase in residential accommodation both in terms of unit numbers and in habitable room numbers as a result of the proposals
- 12.15 The proposals would deliver a significant amount of new housing across the Site in line with policy aspirations. The residential units are delivered on top of commercial ground floor uses, in order to create an active and lively community at the Site. Providing a living community (including housing) is a key aspect of the vision for the Proposed Development.
- 12.16 The provision of a significant amount of housing on this under-utilised brownfield site would assist the City Council and the Mayor in meeting local and strategic housing need. The principle of housing development in this location is entirely appropriate and in accordance with planning policy.

ii. Affordable Housing

- 12.17 The NPPF advises that local authorities should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing) (Paragraph 20).
- 12.18 The Intend to Publish London Plan sets a strategic target for 50 per cent of all new homes delivered across London to be genuinely affordable. Delivering more affordable homes is a key strategic issue for London as the Government strive to meet the need for circa 43,500 affordable home per year as established in the 2017 Strategic Housing Market Assessment. All schemes are expected to maximise the delivery of affordable housing and make the most use of available resources. Affordable housing should be delivered on site to help deliver mixed and inclusive communities.

- 12.19 Of critical importance is that the approach must result in additional affordable homes.
- 12.20 Intend to Publish London Plan Policy H5 sets out the Mayor's threshold approach to the delivery of affordable homes. The threshold level of affordable housing on gross residential development is set at a minimum of 35 per cent with developments proposing less than this not eligible for the "fast track route" for determination of their application.
- 12.21 Paragraph 4.5.3 of the Intend to Publish London Plan states that the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family sized homes. Affordable housing should be provided in line with the desired mix of 30% affordable rent or social rent, 30% intermediate and the remaining 40 per cent to be determined by the Borough.
- 12.22 As the scheme involves the demolition of existing affordable dwellings, Policy H8 of the Intend to Publish London Plan applies. Part E of Policy H8 states that *"all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace."* Officers of the GLA have expressed the view that this Part of the policy applies even though in the case of Walden House the City Council's leasehold ownership will expire in the early 2020s. The proposal is not, therefore, eligible for the Fast Track Route and Policy H8 requires the submission of a Financial Viability Assessment to demonstrate that as much additional affordable housing has been provided, in addition The London Plan recognises that the redevelopment and intensification of London's existing housing has played, and will continue to play, an important role in the evolution of London. The benefits of development proposals that involve the demolition and replacement of existing homes should be balanced against any potential harm.
- 12.23 At a local level, Westminster's adopted local target is for 30% of all new homes to be affordable (Policy S30). The City Council's Interim Guidance Note on Affordable Housing (2013) provides additional detail on this application of this policy, indicating that the 30% target is a strategic target and that higher, and lower, proportions of affordable housing will be sought in different parts of the City, based on evidence the maximum

that is reasonably viable. In this location, outside of the Core CAZ, Table 3 of the Interim Guidance Note provides that 35% affordable housing would be sought.

- 12.24 Whilst the emerging draft City Plan is of little weight, it is relevant that the City Council has indicated that it will seek to amend the draft Plan to refer to the 50% strategic affordable housing target. The City Council has also indicated that it will make amendments to the reasoned justification to Policy 9 to clarify that, in cases where the loss of existing affordable housing are proposed, the City Council will seek the maximum level of replacement affordable housing. This will align the emerging draft City Plan with the approach set out in the Intend to Publish London Plan which, as noted above, carried greater weight.
- 12.25 Whilst adopted local policy therefore refers to a target of 30%, or 35% as clarified by the interim guidance note, emerging strategic and local policy and adopted strategic targets are clear that, in these circumstances, development proposals should provide the maximum possible amount of affordable housing, to be determined through viability testing. The viability assessment for the proposed provision in this scheme is discussed further below.
- 12.26 In terms of tenure split, Intend to Publish London Plan Policy H6 states that at least 30% should be either London Affordable Rent or social rent, 30% intermediate including London Living Rent and the remainder determined by the borough based on local need.
- 12.27 The City Council's draft 2015 Housing Strategy seeks to secure a 60% / 40% split between intermediate and social rent equivalent accommodation (page 14). This is reflected in the emerging draft City Plan (Policy 9E).

Consideration

- 12.28 The development would provide a total of 93 affordable housing units in Buildings B and C. Of these, 44 units will be in tenure equivalent to social rent and the remaining 49 in intermediate tenure.
- 12.29 The 44 social rent units, and 5 of the intermediate units, will fully replace the existing social rent accommodation (40 units in Walden House and 4 within the basement of the Coleshill Buildings) and the five intermediate units in the Coleshill basement. There will,

therefore, be no let loss of existing affordable housing on a unit basis and the floorspace will proposed floorspace will exceed the existing

12.30 The detail of the proposed tenure arrangements for the social rent equivalent accommodation is set out in the Affordable Housing Statement but in summary this will be on equivalent terms, including security of tenure, service charges and rental levels to the tenure of the existing Walden House units. 44 homes will be at Social Rent Levels (target rent caps).

12.31 The proposed unit mix is shown in Table 12.1, below.

	Studio	1 bed	2 bed	3 bed	4 bed	5 Bed	Total
Number of market units C3	5	5	35	25	0	0	70
Number of intermediate units C3	0	33	12	4	0	0	49
Number of social rent units C3	0	11	13	16	3	1	44
Independent Senior Living units C3⁹	2	28	7	0	0	0	37
Total	7	77	67	45	3	1	200

⁹ As shown within the Indicative Design Scheme

Approx. % of Total	3.5%	38.5%	33.5%	22.5%	1.5%	0.5%	
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Table 12.1 – Proposed Unit Mix, by unit size

- 12.32 The existing residents of Walden House have been consulted with extensively in the preparation of the development proposals, as described within the Statement of Community Involvement. The City Council's Housing Department has also been closely involved. All households in Walden House were offered a Right to Return to the new Development by the City Council in its role as their landlord, based on current household need. As part of this commitment the Applicant agreed to ensuring that the new social rent housing on Site will accommodate the current need of Walden House households (to be located in Building C).
- 12.33 Should any Walden House residents opt not to move to Building C, the City Council would then have nomination rights to place other tenants in the usual way.
- 12.34 As described in Section 19 below, the Applicant has also committed, in response to community consultation, to phasing and facilitating the proposed construction to give Walden House residents the choice to move just once, directly into the new social rent housing, or to move away and then exercise their Right to Return. That is, Building C will be constructed and made ready for occupation prior to the demolition of Walden House, allowing residents to move straight into permanent new accommodation without the need for interim accommodation and two moves should they choose to do so
- 12.35 The 'one move' strategy requires the location of the social-rent equivalent affordable housing within Building C, as it, alongside the senior living accommodation in Building A, will be constructed in advance of Building B, which will contain market and intermediate accommodation following the demolition of Walden House.
- 12.36 The proposed Building C will provide a total of 5,582 sqm GIA of social rented floorspace, across 44 units. The average unit size will increase from 71 to 127sqm, before allowing for circulation space. All the proposed units will enjoy access to a range of amenity space, including the rooftop amenity space and play space private to Building C and the private residents between the Coleshill Buildings.

- 12.37 The significant increase in the amount of social rent equivalent floorspace that the Proposed Development would provide, addressing the existing defects of the Walden House accommodation by re-providing units that meet assessed need and meet modern standards, is a significant public benefit of the Proposed Development. This results in an increase in the amount of social housing floorspace on the site of 97% (2,835sqm to 5,582sqm).
- 12.38 Building C would contain 44 of the 93 affordable units provided. The remaining 49 would be intermediate accommodation within Building B2 and B3. This is a tenure split of circa 55% social rent / 45% intermediate by habitable room. This exceeds the City Council's preferred emerging tenure split of 40% social rent / 60% intermediate.
- 12.39 The intermediate accommodation within Building B would be rented, rather than for sale, to ensure that the accommodation was affordable to eligible families. The accommodation would be for rent at London Living Rent levels for the Churchill ward, capped at £60,000 gross household income. The average income requirement would be £52,000.
- 12.40 The proposed rental levels and distribution of units is set out within the Affordable Housing Statement.
- 12.41 By introducing intermediate rent accommodation, the proposal will ensure that as broad as a possible a demographic mix will be accommodated on the Site, to ensure that the existing diversity of the residential community on the site is sustained and enhanced. Overall, the number of affordable homes provided will close to double.
- 12.42 These proposals have been subject to a Financial Viability Assessment which forms part of this application, undertaken by Quod.
- 12.43 The FVA has assessed the financial performance of the Proposed Development as a whole, including the Senior Living accommodation in Building A. The effect of the proposed flexibility in use of Building A is discussed in more detail below.
- 12.44 The Financial Viability Assessment concludes that the Proposed Development provides the maximum level of affordable housing that the Proposed Development could afford. The FVA concludes that the residual profit from the Proposed Development would be

8.11% on gross development value (GDV). This is below the targeted profit level of 19.45%. The FVA therefore concludes that this is the maximum reasonable level of affordable housing that the Proposed Development could provide.

12.45 Having ensured that there will be no net loss of affordable housing as a result of the Proposed Development and that the proposals will maximise the re-provision of new accommodation, the requirements of Policy H6 of the Intend to Publish London Plan are satisfied in respect of the quantum of affordable housing provision.

12.46 Policy H6 does not seek to achieve a specified target percentage of affordable housing. Nevertheless, for information purposes, Table 12.2, below, sets out the affordable housing provision of the Proposed Development, including the Building A layouts within the Indicative Design Scheme, by habitable rooms, units and floorspace. Paragraph 4.5.3 of the Intend to Publish London Plan indicates that affordable housing should be measured on the basis of habitable rooms.

	Habitable rooms	Units	GIA (sqm)
Building A (C2)	112	100	11,336
Building A (C3)	79	37	7,009
Market (C3)	220	70	12,732
Intermediate (C3)	118	49	4,778
Social Rent (C3)	146	44	5,582
Total	675	300	41,437
AH Percentage	47%	47%	34%
AH Percentage (including Class C2 Assisted Living rooms)	39%	31%	25%

Table 12.2 – Affordable Housing, by habitable rooms, units and floorspace

- 12.47 Paragraph 4.13.4 of the Intend to Publish London Plan directs that Class C2-type accommodation / care home accommodation is **not** subject to Policy H13(B), which requires affordable housing from specialist older people's accommodation.
- 12.48 Table 12.2 reports the proposed affordable housing as a percentage of both the total number of habitable residential rooms, and the total number of habitable rooms including those within the Senior Living accommodation that would, individually, be considered to be Class C2 / care home accommodation, rather than Class C3. This is because of the high level of care that would be provided to residents within these units, integrated into the operation of Building A as a whole as a package with no clear separation between the two. These assisted living units would, additionally, not, generally be self-contained, providing no, or very limited, kitchen facilities and being more akin to a private hospital room.
- 12.49 In view of the fact that the 'care home accommodation' element of Building A is not expected to provide affordable housing, the most appropriate reporting metric for the proportion of affordable housing is as a percentage of habitable rooms, without including the rooms in Class C2-type / care home accommodation type use.
- 12.50 **Table 12.2 therefore illustrates that Proposed Development, in the Indicative Design Scheme scenario, would provide 47% affordable housing by units and by habitable rooms.** This is a significant contribution to affordable housing provision in the City well in excess of level achieved on other residential-led mixed use development proposals. This is notwithstanding the fact that Policy H6 requires the maximum reasonable level of affordable housing rather than a specified percentage target.
- 12.51 Were others to consider that the Class C2-type element of senior living accommodation was required to contribute to affordable housing provision, notwithstanding Paragraph 4.13.4 of the Intend to Publish London Plan, the absolute amount of affordable housing proposed (93 units) would not change because the level of affordable housing is the maximum that can be afforded, based on viability evidence. For the avoidance of doubt, **the FVA has taken into account and assessed financial performance of Building A in its entirety**, not just the part of it that may be equivalent to Class C3

accommodation and thus required to contribute to affordable housing by Intend to Publish London Plan Policy H13.

12.52 As described in Section 5, the Applicant is seeking flexibility to allow the proposed operational model of Building A to evolve as potential older people's housing providers assess the UK market. For this reason, the Environmental Statement has assessed two parameters for the make-up of the accommodation in this building:

- i **Maximum Independent Living** (allowing for all the accommodation to be made up of independent living accommodation), and
- ii **Maximum Assisted Living** (allowing for c. 84% of the accommodation to be assisted living accommodation with only a small number of independent living units).

12.53 The final configuration of Building A would be at, or between, these parameters. The Indicative Design Scheme illustrates one potential configuration.

12.54 The implications of this flexibility are addressed within the FVA. An appraisal has been prepared on the basis of the Indicative Design Scheme in the application drawings, which includes both the Independent and Assisted Living tenures. Introducing the assisted living component to the 100% independent living scheme reduces the gross to net ratio due to the increase in communal and ancillary spaces, meaning that higher values on a £ psf basis would need to be achieved to be able to achieve viability that is equivalent to the Maximum Independent Living scheme. The market for this type of accommodation is largely untested in the UK and consequently assessing the viability of the proposals on the basis of a 100% independent living scheme is appropriate and the most robust approach, notwithstanding the flexibility sought in planning terms.

12.55 Appendix E provides alternative accommodation schedules that set out the potential unit mix and proportion of affordable housing, on a habitable room, unit and floorspace basis, for the Indicative Design Scheme, Maximum Assisted Living scheme and Maximum Independent Living scheme, in accordance with the parameters assessed in the ES.

12.56 Appendix E demonstrates that, should a 100% independent living mix in Building A be pursued, the Proposed Development would equate to 37% affordable housing by

habitable rooms and by unit. Should the amount of assisted living accommodation be maximised, the amount of affordable housing would equate to 50% by habitable room and by unit, or 30% and 39% respectively should others consider that the Class-C2 type accommodation should be included.

12.57 In summary, the most up-to-date and relevant emerging policy which addresses the particular circumstances of this Site (meaning in particular the demolition of existing affordable housing) requires that existing affordable housing should be replaced and that, additionally, the amount of new affordable accommodation should be maximised. This policy has been satisfied, both by the replacement of the existing socially rented accommodation with 44 new units in Building C, that will ensure the units are of an appropriate modern size and standard through a 97% increase in floorspace, and by the provision of 49 intermediate units, increasing the number of affordable housing units on site from 49 to 93. An FVA has demonstrated that this is the maximum that can be afforded. The broad tenure mix complies with the City Council's emerging preferences and Intend to Publish London Plan policy. The intermediate accommodation will be affordable to a range of income levels.

12.58 The Proposed Development is, therefore, fully consistent with the objectives of adopted and emerging affordable housing policy and will make a significant contribution to the provision of a range of good quality affordable housing.

b) Senior Living Accommodation (Class C2 and/or C3)

12.59 Paragraph 61 of the NPPF recognises that the supply of homes should take account of different groups in the community including homes for older people. The PPG also recognises that the need to provide housing for older people is critical, and offering older people a better choice of accommodation to suit their changing needs can help them live independent for longer and feel more connected to communities.

12.60 Section 4.13.1 of the Intend to Publish London Plan estimates that by 2029 '*the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent*'. It is therefore recognised that appropriate accommodation is required to meet the needs of older Londoners.

- 12.61 London Plan policy SD6 states that the particular suitability of town centres to accommodate a diverse range of housing should be considered and encouraged, including smaller households, Build to Rent, older people's housing and student accommodation.
- 12.62 Intend to Publish London Plan Policy H13 states that specialist older persons housing should be of the highest standards of accessible and inclusive design, provide suitable levels of safe storage and charging facilities for residents scooters, and pick up and drop off facilities close to principal entrance suitable for taxis, minibuses and ambulances. There is also a requirement to provide affordable housing in accordance with Policy H4 and H5 of the London Plan.
- 12.63 Policy H13 of the Intend to Publish London Plan also recognises the increasing need for accommodation suitable for people with dementia. Section 4.13.13 predicts that the total number of older people with dementia in London is forecast to rise from 73,825 in 2017 to 96,939 in 2029, which is an increase of 31%.
- 12.64 Section 4.13.8 of the Intend to Publish London Plan identifies a total potential demand in London across all tenures for just over 4,000 specialist older persons units a year between 2017-2029. Table 4.3 of the Intend to Publish London Plan shows that the annual borough benchmarks for specialist older persons housing between 2017-2029 for the City of Westminster is 100 units per annum. Furthermore, section 4.13.10 anticipates that after 2029 the number of older persons households will continue to increase.
- 12.65 Section 4.13.14 of the Intend to Publish London Plan recognises that care home accommodation (Class C2) is an important accommodation option for older Londoners. To meet the increase in demand for care home beds to 2029, it is estimated that London needs to provide an average of 867 care home beds per year.
- 12.66 The supporting text of Policy S15 of the City Plan recognises the importance of safeguarding specialist housing and acknowledges that this need is likely to increase in the future, particularly with an ageing population.
- 12.67 Section 11.11 of the draft City Plan anticipates that there will be a 52% increase in those aged 75 and living in Westminster between 2017 and 2030. There is also expected to

be a 45% increase in those over 65 suffering from dementia in Westminster between 2015 and 2030. As such, there is a growing need for new housing to meet a range of older people's accommodation needs.

12.68 Section 11.14 states that the City of Westminster will assess the quality of new homes for older people with particular regard to:

- i. design features suitable for dementia sufferers both in the home and in shared spaces which are part of the development;
- ii. availability of on-site care and support;
- iii. facilities in the development or nearby for community and social interaction;
- iv. access to technology such as tele-care;
- v. Wi-Fi and broadband;
- vi. storage options for mobility scooters;
- vii. adaptability of the units for future mobility needs; and
- viii. access to public transport.

Assessment

12.69 The Senior Living accommodation within the Cundy Street Quarter will be made up of two types of care provision, Assisted Living and Independent Living. Assisted Living would, in isolation, fall under a Class C2 use as a residential institution. Independent Living would, in isolation, be a Class C3 residential use. As Building A will combine elements of both within a single planning unit and so the description of development applied for needs to allow for that flexibility, hence how this is described within this application. The exact make up of Building A would be secured via condition. The Applicant is in detailed discussions with potential operators but the details of the proposed operational model are continuing to evolve as the UK market is studied.

12.70 All the accommodation would be let only to primary tenants over the age of 65 with care needs, confirmed by an independent assessment. Primary tenants would be those with the independently assessed care need who qualify for residence within Building A. The

primary tenant could be accompanied (by a partner, spouse, sibling or friend). This would be on the condition that partners, or similar, would vacate the premises at the same time as the primary tenant should that tenant choose to leave, or within six months should the primary tenant pass away. The assisted living units would provide residents with a home within which they can benefit from 24 care and emergency support if required. The proposed use will have extensive shared amenity, care and support facilities, including exercise, library, dining, treatment and a shared reception/concierge. Residents could change and adapt the amount of care they receive to meet their needs.

12.71 Senior Living Accommodation delivers a range of societal benefits, which are set out as follows:

- a) Purpose-built, specialist accommodation for older people can provide care on a sliding scale to meet peoples' needs as they age, in an environment where residents can retain a sense of independence and can be incorporated into a community.
- b) Providing these facilities helps in reducing the burden on the NHS through reducing 'bed blocking' and the number of NHS GP and hospital visits. The on-site care team would be able to assist residents with their care, and the accommodation provided would be adapted and suitable for a range of needs. Many older peoples' accommodation is not suitable for their needs, hence longer stays in hospitals.
- c) There is significant demand for professional carers, creating pressure on social services which often results in i) carers having to rush their visits home and ii) a lack of continuity which prevents the chance to build a relationship or even establish proper communication. Specialist accommodation allows for more established relationships and a better understanding of care needs for those residents living in the accommodation and assists in alleviating the pressure for the wider care system.
- d) Many older people are currently under-utilising their homes as younger generations leave the family home. These people generally own their own home and have a level of independence, so living in an independent living unit is attractive given the home independence. This then helps to 'free up' these larger family homes for younger families.
- e) Specialist accommodation assists in addressing issues of loneliness amongst the elderly as residents of specialist accommodation benefit from an on-site

community access to shared facilities and communal activities. Specialist accommodation offers a safe and secure environment.

- 12.72 In particular, 'freeing up' the housing stock through the provision of specially designed accommodation for older people would better utilise existing housing stock and help respond to demand for family housing. The provision of assisted living accommodation must be considered within this context, and not solely on the type of housing that is being delivered.
- 12.73 The proposals would deliver a significant amount of assisted living accommodation, which would help to meet demonstrated demand both within the local area, and within the wider Borough. The Mayor's Housing SPG identifies a specific shortfall of private older people's accommodation across London. Therefore, the provision of this accommodation is in line with planning policy.
- 12.74 The Mayor's Housing SPG (paragraph 3.7.14) and the City Council's policies also require any accommodation for older people to be in a suitable location. The accommodation would be easily accessed by private car, as well as public transport. The location of the assisted living accommodation on the wider site is also of consideration. The senior living accommodation is accessed from Cundy Street and is uniquely positioned on the Site, forming a gateway to the newly created pedestrian route – Five Fields Row – and being located at the heart of the development on Elizabeth Place and Elizabeth Place Gardens.
- 12.75 **The senior living accommodation would meet identified local demand in a location which is suitable and accessible. This is in line with NPPF aspirations, the London Plan and Mayor's Housing SPG as well as City Council planning policies. Therefore, the principle of this use is acceptable.**

c) Town Centre Uses

- 12.76 Town centre uses, as set out in the NPPF, include amongst others retail development, leisure, entertainment, sport and recreation uses (including cinemas, restaurants, pubs and health and fitness centres), offices, arts, culture and tourism development (including

museums and hotels). The proposal includes the introduction of the following town centre uses on the Site:

- i 4,664 sqm (GIA) 'Flexible use' floorspace to allow for a mix of shops, restaurants, cafés and a bar;
- ii A food store;
- iii A new cinema, located at the centre of the development;
- iv 413 sq m of flexible affordable Retail/Office Accommodation

12.77 The acceptability of these town centre uses in land use terms is assessed in this section of the Town Planning Statement.

i. Retail

12.78 One of the core principles of the NPPF is to promote mixed use developments and encourage multiple benefits from the use of land in urban areas. Paragraph 85 of the NPPF seeks to promote “positive, competitive” town centre environments and to direct retail development to town centres in the first instance, recognising town centres as the heart of their communities.

12.79 The Intend to Publish London Plan Policy GG1 Part F promotes the crucial role town centres have in the social, civic, culture and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night time. London's Central Activities Zone and town centres are the primary location identified for commercial activity in the capital.

12.80 The Intend to Publish London Plan also recognises that town centres will not accommodate all town centre development and states that if no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge of centres, that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport.

12.81 At a local level, the Site is located just outside the Core Central Activities Zone and the Victoria Opportunity Area. The Coleshill Flats form part of the Pimlico Road Local Shopping Centre. Whilst, therefore, not within a centre itself the site is immediately adjacent and between two existing centres. The Site can in policy terms can therefore clearly be regarded as an 'edge of centre' location.

12.82 A Retail Impact Assessment and a Sequential Assessment have been carried out and the findings are set out in the subsequent section of this report. It is concluded that the proposed retail and leisure use will have a positive beneficial effect on nearby retail centres, particularly the Pimlico Road Local Centre by improving the range and diversity of its retail offer, thus promoting improved footfall. The proposal will support the character and function of Westminster's shopping centres which is the expressed reason for the approach of Policy S21. The scale of retail and leisure proposed is in line with the overall scheme and policy direction.

12.83 As previously set out, there are specific locational matters which are driving the particular need for this retail and leisure development at the site. These include:

- i Aspiration to provide comprehensive mixed-use development to allow a healthy mix of uses to support and enhance the function of these areas;
- ii Activation of ground floor frontages and pedestrian links through the site; and
- iii The creation of new local food store to support the needs of the local community to access convenience goods, which was requested during consultation with local stakeholders and the local community.

12.84 The applicant proposes that a condition would be imposed to the effect that the food store would be used only for convenience, and ancillary comparison, sales.

12.85 **The scale of the retail proposed is appropriate to the size of the development proposed and will serve newly created local needs. The scheme proposes a range of flexible use with suggested caps to ensure a true mix of uses come forward to achieve a vibrant living quarter. The retail would complement, not compete with nearby retail centres.**

ii. Entertainment Uses

- 12.86 Westminster's City Plan at paragraph 4.37 considers that Westminster is the entertainment heart of London. It identifies that the vibrant entertainment sector plays a vital role, not only through supporting other uses, but also as a visitor attraction in its own right which contributes to Westminster's local distinctiveness and London's world-city status.
- 12.87 The definition of entertainment uses is provided within the glossary of the City Plan. Amongst other land uses, restaurants (Class A3) are considered to be entertainment uses. The saved UDP considers that entertainment uses are closely linked to other functions of the City. For example, restaurants are often visited by people making shopping, theatre and cinema trips and thus support the shopping and traditional entertainment functions of the West End. As such, entertainment uses such as restaurants are a key characteristic of the CAZ and CAZ frontages and are complementary to the mixed use character and diversity of central Westminster
- 12.88 Policy S24 of the City Plan requires proposals for entertainment uses to demonstrate that they would not adversely impact on residential amenity, health and safety, local environmental quality and the character and function of the area.
- 12.89 Saved UDP policies TACE 8-10 seek to control the location, size and activities of entertainment uses in order to safeguard residential amenity, local environmental quality and the established character and function of the various parts of the City, whilst acknowledging that they provide services to people living in, working in and visiting the City and contribute to its role as an entertainment centre of national and international importance.
- 12.90 The balance of these policies in terms of promoting entertainment uses and protecting amenity varies depending on the size, type and location of the entertainment use, with proposals for restaurants, cafés, public houses and bars and other entertainment uses of between 150 and 500 sq m of gross floorspace outside the Central Activities Zone. The saved UDP policy states that permission will only be granted for proposals where the City Council is satisfied that the Proposed Development has:
1. no adverse effect, (nor, taking into account the number and distribution of entertainment uses in the vicinity, any cumulatively adverse effect) upon residential amenity or local environmental quality as a result of:

- a) noise;
- b) vibration;
- c) smells;
- d) increased late night activity, or
- e) increased parking and traffic; and
- f) no adverse effect on the character or function of its area.

12.91 A maximum of 750 sq m of A3 uses are proposed across the Site with the largest A3 unit being under 500 sq m. A maximum of 150 sq m of Class A4 uses is also proposed.

12.92 The entertainment uses proposed on this Site form part of a wider mixed-use development which is being brought forward at the same time. The nearest residential units to the proposed entertainment uses are the residential units within the scheme itself. Accordingly, the scheme has been designed carefully to ensure a harmonious mixed-use environment. Measures are in place to ensure there are no issues of noise, vibration or smells arising from the entertainment units.

12.93 The area will be actively managed to ensure any late-night activity does not disturb the neighbouring residential units. The proposed operating hours are in line with core hours outlined within the UDP - until midnight during the week and 00:30 on weekends.

12.94 The entertainment uses contribute to the vitality and viability of the area and will help to draw people in and animate the area, particular during the evening. **The scale of the entertainment units proposed is appropriate to the size of the development proposed. The entertainment uses will support and enhance the wider function of the area and will help to achieve a vibrant living quarter.**

iii. Leisure

12.95 The Intend to Publish London Plan Policy HC5 supports the development of new cultural venues in town centres and places with good public transport connectivity. The Intend

to Publish London Plan Policy HC6 promotes the night-time economy where public transport is available

12.96 Westminster is at the heart of London's visitor economy with a range and combination of tourism, arts and cultural attractions. Westminster seeks to strengthen their strategic role within the London tourist industry and help contribute to local opportunities to experience arts and culture.

12.97 The definition of arts and cultural uses is provided within the glossary of the City Plan. Amongst other land uses, cinemas (Class D2) are considered to be arts and cultural uses.

12.98 Policy S22 of the City Plan states that outside the CAZ, new arts and cultural uses will be acceptable where they are of a local scale and benefit the local community, are appropriate to the local context and can be managed without adversely impacting on residential amenity.

12.99 Policy TACE 5 part C of the UDP applies to this proposal and notes that outside the CAZ, planning permission for new arts and cultural uses will only be granted where they meet the following criteria:

- i. They would be compatible with the character and function of the area;
- ii. There would be no adverse effects on residential amenity; and
- iii. There would be no adverse environmental or traffic effects

12.100 The cinema was requested by residents during the consultation with local stakeholders and the community.

12.101 The cinema will activate the ground floor of the development into the evening and draw people to the wider site contributing to the desire to provide a comprehensive mix of uses to support and enhance the function of the area. The cinema is of an appropriate size and scale for the development and is compatible with the wider ground floor tower centre uses.

12.102 The cinema is considered an appropriate use of the ground and basement floorspace. Sound mitigation proposals have been included to ensure no adverse noise impact from the cinema itself. An appropriate management strategy will be put in place to reduce

any negative impact on the quality of life for local residents from late night cinema customers.

12.103 The proposed cinema would have a positive and beneficial impact in the area, addressing a demand. The cinema will activate the ground floor of the development into the evening and attract people to the area. The cinema will support and enhance the wider function of the area. The applicant anticipates that a condition will be imposed restricting the use of this space to cinema, and similar functions, only and not for other purposes within Class D2.

iv. Affordable Workspace / Retail floorspace (Class A1/B1)

12.104 The Intend to Publish London Plan includes a policy on the provision of affordable workspace. It is considered important that London continues to generate a wide range of economic and other opportunities, to ensure that London is a fairer more inclusive and more equal city.

12.105 The London Plan indicates that the cost of workspace in London is particularly high relative to other parts of the UK and to ensure that all types of development needed to support the economy can be accommodated there is a need for affordable workspace for some economic, social and cultural uses that cannot afford to operate at open market rents and to support start-up or early stage business.

12.106 The Mayor wants to support sectors that have cultural or social value such as artists, designer-makers, charities, voluntary and community organisations and social enterprises for which low-cost space can be important.

12.107 The Mayor encourages the delivery of new workspace for SMEs, the creative industries, artists and fashion industry within new residential and mixed-use developments.

12.108 At a local level, there is recognition within the adopted City Plan that in addition to offices, a range of other B1 floorspace is required in Westminster to ensure diversity across employment sectors. This supports a range of business activities including creative industries and employment opportunities. It will be sought where non-office type floorspace such as workshops and studios are appropriate as part of the overall mix of uses because of their location or existing use.

12.109 Most of the tenants occupying the retail floorspace in the existing Pimlico Local Centre provide art galleries, furniture, antiques, interior and design shops. Grosvenor recognise that for these industries finding affordable workspace can be difficult. As part of the proposal affordable retail/workshop space is proposed in the basement of the Coleshill Flats to help address this need. Of note these flats were originally built for artisans so this use would have a historic connection with the buildings.

12.110 Should vacant possession be possible at this part of the Site, the Applicant has committed to offering the accommodation at 50% of the market rate, and 50% service charge, for a 20-year period in order to support new businesses and artisans in the area. Should planning permission be granted, the Applicant would accept an obligation within the legal agreement to this effect.

12.111 The affordable workspace within the Proposed Development will contribute to the mix of land uses that support and enhance the function of the area.

v. Community Use (Class D1)

12.112 Policy GG1 (C) of the Intend to Publish London Plan states that to build strong and inclusive communities, development should provide access to good quality community spaces that encourage and strengthen communities, increase active participation, social integration and reduce social isolation.

12.113 At a local level, policy S34 of the City Plan states that new social and community facilities will be encouraged throughout Westminster.

12.114 Saved Unitary Development Plan Policy SOC 1 seeks the provision of community facilities on appropriate sites. Part B requires the facilities to:

- i be located as near as possible to the residential areas they serve;
- ii not harm the amenity of the surrounding area, including the effect of any traffic generated by the proposal;
- iii be safe and easy to reach on foot, by cycle and by public transport.

12.115 There is clear policy support for the provision of appropriate social and community uses in this location.

12.116 At this stage the Applicant has not determined exactly what this space will be used for and rather than proposing something which may change going forwards seeks flexibility to allow a decision on this to be made closer to scheme completion, post-planning. At this point a number of options have been considered including use for well-being classes, a small café run by the community, flexible workspace for local residents or it could be linked to the cinema which is next door.

12.117 The Applicant is committed to ensuring that this space is retained as a community facility in perpetuity and that any operator would be charged a peppercorn rent, this is something which has been included within the accompanying Financial Viability Assessment.

12.118 A number of suggestions for the use of this space have been provided as part of local consultation and the Applicant will continue to liaise with residents to understand what use/s would be genuinely well-used and be beneficial to the local community.

12.119 Should planning permission be granted, the Applicant would accept a planning condition requiring an operational management statement setting out how this community space would be used and managed'.

12.120 The scheme will provide a space for the benefit of the local community and is supported at all policy levels.

13. Planning Consideration – Retail Sequential and Impact Assessment

13.1 This section assesses:

- i the availability and suitability of other alternative sites for the proposed retail and leisure development in the context of the sequential approach; and
- ii the potential impact of the proposed development on the vitality and viability of other local centres.

13.2 As described above, the proposals seek to provide seven flexible retail/ restaurant/drinking establishment (Class A1/A3/A4) units, six retail (Class A1) units, one flexible retail/restaurant/office (Class A1/A3/B1) unit and a cinema (Class D2) unit. The proposals also seek to provide retail/office (Class A1/B1) floorspace at basement level of the Coleshill buildings. The proposals would provide a total of 2,835 sqm (RICS GIA) of retail floorspace and 846 sqm (RICS GIA) of leisure floorspace, totalling 3,681 sqm (RICS GIA).

Planning Policy

13.3 Section 7 of the NPPF (Feb 2019) seeks to promote a positive approach to town centre growth, management and adaptation. Paragraph 85(e) recognises that, where retail development cannot be accommodated within existing town centre sites, edge of centre locations that are well connected to town centres can be appropriate.

13.4 Paragraph 86 of the NPPF states that:

“Local planning authorities should apply a sequential test to planning applications for main town centre uses, which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.”

13.5 When considering edge of centre proposals, paragraph 87 of the NPPF states that preference should be given to accessible sites which are well connected to the town centre.

Applicants should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise edge of centre sites are fully explored.

13.6 We have also had regard to the application of the sequential test as set out in the Planning Practice Guidance (March 2014), which states that the purpose of the sequential test is to support *“the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision taking.”*

13.7 In addition, the Planning Practice Guidance sets out a checklist of considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- *“with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.*
- *is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.*
- *if there are no suitable sequentially preferable locations, the sequential test is passed.”*

13.8 At a local level, Policy S21 of the City Plan states that new retail floorspace will be directed to the designated Shopping Centres.

13.9 In respect of impact, Paragraph 89 of the NPPF (2019) sets out that applications for retail and leisure development outside of town centres should require an impact assessment if the development is over 2,500 sqm (where there is no locally set threshold). This should include assessment of:

“a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)."

- 13.10 The proposals would provide a total of 3,022 sqm (RICS GIA) of retail floorspace and 846 sqm (RICS GIA) of leisure floorspace, totalling 3,868 sqm (RICS GIA), and therefore a retail impact assessment is required for this proposal. This assessment has undertaken a quantitative assessment in accordance with the two tests set out in the NPPF as set out above.

Sequential Assessment

- 13.11 This section considers alternative locations in sequentially preferable sites.

Central Activities Zone

- 13.12 The site immediately adjoins the Central Activities Zone, the border of which runs along the northern and eastern side of Ebury Square. The CAZ contains a number of designated retail centres, the nearest of which is Victoria Street, and a proliferation of retail and town centre uses across the area.

Pimlico Road Local Shopping Centre

- 13.13 The Pimlico Road Local Shopping Centre ('the Centre') is located to the south-west of the borough and intersects with the eastern boundary of the Royal Borough of Kensington and Chelsea. The Pimlico Road Local Shopping Centre is defined on the Westminster's Proposals map, as shown in Figure 13.1 below.



Figure 13.1 – Extract of Pimlico Road Local Shopping Centre (Blue) from adopted City Plan: Strategic Policies proposals map

- 13.14 The Site includes the lower ground floors of the Coleshill Flats, which are located in the Pimlico Road Local Shopping Centre. For retail purposes, the other parts of the Site are located on the edge of the centre, as defined by the glossary in the NPPF, as a location that is well connected to and 300 meters from the primary shopping area.
- 13.15 The Pimlico Road Local Shopping Centre is located to the south-west of the borough and intersects with the eastern boundary of the Royal Borough of Kensington and Chelsea. The frontage of the Pimlico Road Local Shopping Centre is identified as primary. The Centre is a linear, smaller centre, which plays a more localised role for residents and workers and supports the day-to-day needs of its local population. The Centre also serves the wider catchment area of Victoria and Sloane Square.
- 13.16 The Pimlico Road Local Shopping Centre has good accessibility by public transport, with a PTAL rating of 6a. Sloane Square Underground Station, which serves the circle and district lines is in close walking distance of the main shopping centre. Victoria station and underground are also located in close walking distance alongside Victoria Coach Station, which is a terminal for the local bus network. The Bourne Street TFL cycle docking stations are also located in proximity to the north of the centre and accommodates 16 bicycles.

Composition of Pimlico Road Local Shopping Centre

- 13.17 The Pimlico Road Local Shopping Centre was last surveyed by Experian GOAD in May 2019. To ensure that an up to date picture of availability in the Centre was obtained, a survey was undertaken by Gerald Eve in March 2020, to identify all vacant units and other potential sites in the local centre.
- 13.18 The Pimlico Road Local Shopping Centre has a good presence of smaller retailers spread throughout the central shopping area. The general environmental quality was good across the centre of town; although the sense of place gradually declines at the edges of the town centre.
- 13.19 Pimlico Road Centre predominantly consists of small traditional units. The average size of retail premises in the Pimlico Local Shopping Centre is 91 sqm (*Town Centre Health Checks Report 2018-2019*).
- 13.20 In terms of land use, Table 13.1 collates data from the Belgravia Experian GOAD Map and shows that although there is a mix of uses, the majority of the Pimlico Road Local Shopping Centre frontage is retail (Class A1) floorspace.

Use Class	Units	Floorspace sqm GIA
Retail (Class A1)	53	6080
Restaurant (Class A3)	4	390
Drinking Establishments (Class A4)	1	190
Office (Class B1)	1	110
Total A Class	57	6660
Total	59	6770

Table 13.1: Composition of Pimlico Road Local Shopping Centre by Use Class
(Source: GE Town Centre Survey; Floor areas taken from Experian GOAD)

- 13.21 Table 13.2 demonstrates that Pimlico Road Local Shopping Centre is a strong comparison centre; 62% of the total floorspace provides comparison goods, whilst only 1% of the total floorspace provides convenience goods. Most of the tenants occupying the retail

floorspace in the Centre provide art galleries, furniture, antiques, interior and design shops. The centre's specialist art, antiques and design offer suggests that its customer base is mostly made of people on a specialist shopping trip.

Type	Units	% of total units	Floorspace (sqm)	% of total floorspace
Convenience	1	2%	70	1%
Comparison	43	73%	4170	62%
Service	6	10%	1840	27%
Vacant	9	15%	690	10%
Total	59	100%	6770	100%

Table 13.2: Composition of Pimlico Road Local Shopping Centre by Type of Goods (Source: GE Town Centre Survey; Floor areas taken from Experian GOAD)

- 13.22 This specialist character is recognised in the description of the centre in paragraph 7.92 of the adopted UDP, which refers to the centre's "concentration of fine art and antique shops." The UDP also recognises the role of local centres like this close the CAZ in serving local workers and businesses, students and visitors, as well as residents.
- 13.23 In relation to vacancy rates, the average overall UK retail and leisure vacancy rate is 12% (*The Town Centre Health Checks Report 2018-2019*). The Centre figure is marginally higher than this, at an average at 15%. There are 9 vacant units and the total vacant floorspace is 690 sqm. The vacant floorspace is Class A1 and Class A3. It should be noted that these figures were prepared before the Covid-19 outbreak and the associated imposed closures in place at the time of submission of this application.

Vacant Unit	Unit Size (sqm)	Use Class
20 Pimlico Road	110	A1
22 Pimlico Road	100	A1
41 Pimlico Road	40	A1
43 Pimlico Road	60	A1
63 Pimlico Road	40	A1
62-64 Pimlico Road	80	A1
72 Pimlico Road	100	A3
103 Pimlico Road	80	A1
105 Pimlico Road	80	A1

Table 13.3: Vacant Units in the Pimlico Road Local Shopping Centre (source: GE Town Centre Survey; Floor Areas and Use Class taken from Experian GOAD)

- 13.24 The shopping environment has been maintained, providing high quality public realm and cleanliness.
- 13.25 Overall, it is considered that the Pimlico Road Local Shopping Centre remains a vibrant and vital local shopping centre, which is in good health (Town Centre Health Checks Report 2018-2019).

Assessment

- 13.26 The proposals would provide a total of 2,835 sqm (RICS GIA) of retail floorspace and 846 sqm (RICS GIA) of leisure floorspace, totalling 3,681 sqm (RICS GIA). The proposed unit sizes are as follows:

Use Class	Units	Unit size range (sqm)
Class A1/A3/A4	7	63
		78
		104
		108
		146
		150
		404
Class A1 (food)	1	357
Class A1	5	33
		35
		59
		153
		246
Class A1/A3/B1	1	486
Class D2	1	846
Class A1/B1 (affordable retail / workspace at 50% of market rents)	1	413

13.27

Total		3681
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Table 13.4: Proposed Unit Sizes sqm

13.28 In terms of the flexible uses proposed, the application proposes minimum and maximum areas to give greater certainty on the quantum of flexible uses.

- i. Minimum Class A1 – 1,035 sqm GIA;
- ii. Maximum Class A3 – 750 sqm GIA;
- iii. Maximum Class A4 – 150 sqm GIA;
- iv. Maximum Class B1 – 900 sqm GIA;

13.29 The vacant town centre sites were identified in Gerald Eve's site visit, as detailed in Table 13.3 and have been considered in this sequential assessment. Where relevant, each site is then considered against the following criteria:

- i. Site description and size;
- ii. Suitability;
- iii. Viability; and
- iv. Availability.

13.30 The vacant units are not clustered together and are spread evenly across the Centre. A location plan of the sites considered in the sequential assessment is enclosed in Appendix F.

13.31 Prior to the consideration of these sites, it is important to acknowledge that there are specific locational matters which are driving the particular need for this retail and leisure development at the site. These include:

- i. Aspiration to provide comprehensive mixed-use development to allow a healthy mix of uses to support and enhance the function of these areas;
- ii. The need to activate ground floor frontages and pedestrian links through the Site; and

- iii. The creation of a new local food store to support the needs of the local community to access convenience goods, which was requested during consultation with local stakeholders and the local community.

13.32 In the Pimlico Local Shopping Centre, only 1.4% of the total A1 floorspace is convenience floorspace. During consultation with local stakeholders and the local community, one of the key concerns raised was that the Centre provided predominantly specialist shops and that more convenience was required. In response to the feedback received, the proposals were amended to include a local food store (Class A1), to support the needs of the local community to access convenience goods in the area. The scale and format of this unit is appropriate for a larger retail who requires large box floorplates to operate viably.

13.33 Furthermore, the Town Centre Health Checks Report 2018-2019, notes that as a general trend *'smaller centres have experienced a loss of convenience retail in relation to comparison uses between 2012/2013 and 2017.'* The Proposed Development therefore can also offer other units, with suitable, viable, larger floorplates, which could be used to increase the provision of convenience goods in the Centre should there be demand for it

13.34 This is consistent with the Applicant's wider experience of discussions with its residential communities in Belgravia, where the difficulties of accessing convenience retail are frequently raised.

13.35 These factors underline the site-specific need for the Proposed Development at the application site as these needs cannot be met elsewhere. This is a material consideration in undertaking the sequential assessment.

Vacant Units

20 and 22 Pimlico Road

13.36 Nos. 20 and 22 Pimlico Road are two vacant sites at ground floor level of the Grade II listed Coleshill Building. The units are 110 sqm and 100sqm respectively.

13.37 The ground floor units of the Coleshill Flats are predominantly occupied by furniture and antique retailers. The nature of these retail occupiers lend themselves to being located within a listed building due to the lack of physical internal alterations required. However, it

is intended that the Proposed Development would seek to attract modern retailers, by providing retail units that are adaptable, are able to adjust to changing retail and social trends, and offer shoppers and visitors the experience they want. The grade II listed units at Nos. 20 and 22 Pimlico Road would therefore be unsuitable as they are less adaptable and, unlike the Proposed Development, would not meet the commercial and operational requirements of modern retailers.

41 Pimlico Road, 43 Pimlico Road, 63 Pimlico Road

- 13.38 The vacant retail units at 41 Pimlico Road, 43 Pimlico Road and 63 Pimlico Road are located on the south side of Pimlico Road facing Orange Square. The units are 40 sqm, 60 sqm and 40 sqm respectively.
- 13.39 These vacant units form part of wider redevelopment proposals by Grosvenor Estate Belgravia for the Site comprising 41, 43, 57, 59 and 61-63 Pimlico Road, and are not therefore available to meet the identified need for this site.
- 13.40 On 30 November 2016, planning permission (ref: 16/04562/FULL) was granted at 41, 43, 57, 59 and 61-63 Pimlico Road for the following:

“Demolition and reconstruction behind a retained front facade of 41, 43, 57, 59 and 63 Pimlico Road including the realignment of the rear elevation, the installation of new roof structures to match the existing, and the creation of external terraces; demolition of 61 Pimlico Road (the element directly fronting onto Pimlico Road) and construction of infill accommodation at ground, first, second and third floors; replacement of shopfronts to 41, 43, 57, 59 and 63 Pimlico Road; retention and sub-division of the builders' yard at 61 Pimlico Road (behind the frontage to Pimlico Road), installation of a partial mezzanine floor and creation of lateral connections at ground floor level to 41, 43, 57 and 59 Pimlico Road; replacement of the builders' yard glazed roof lantern; creation of roof level plant enclosure above part of the builders' yard; creation of 4no. Class A1 retail units at basement, ground and mezzanine level, with 7no. Class C3 residential dwellings at the first, second and third floor levels (with ground floor access); sub-surface excavation including lowering of ground floor slabs and the creation of additional basement accommodation; together with other external alterations).”

13.41 The Proposed Development will create 2no. larger retail units along with 2no. smaller retail units, that are comparable with the size of the existing retail units. The proposed units will include 2 smaller units of 102 and 148 sqm GIA, along with 2 larger Class A1 retail units of 984 and 1,121 sqm GIA. All of the units will be occupied by Class A1 retailers and will result in 815 sqm of additional Class A1 floorspace.

13.42 The approved retail units should only be for non food retail purposes in accordance with condition 6 of planning permission (16/04562/FULL), which states that:

“notwithstanding the provisions of Class A1 of the Town and Country Planning (Use Classes) Order 1987 (or any provision equivalent to that class in any statutory instrument revoking or re-enacting that order) the retail accommodation hereby approved at ground floor level shall only be used for non-food retail purposes unless otherwise agreed in writing by the City Council as local planning authority.”

13.43 Following this, on 9 November 2019, a CLEUD (ref: 19/07400/CLOPUD) was issued, confirming that planning permission had commenced and that the permission can continue to be implemented lawfully.

13.44 As works are ongoing at 41 Pimlico Road, 43 Pimlico Road and 63 Pimlico Road, these sites are not available for the Proposed Development in the short to medium term and are not suitable for the proposed food store as the units should be used for non-food retail only.

62-64 Pimlico Road

13.45 No. 62-64 Pimlico Road is located on the corner intersection of Pimlico Road and Passmore Street. The unit provides 80 sqm of Class A1 floorspace, which although is physically large enough to support the smaller of the proposed retail units, it is not considered that it would meet the commercial and operational requirements for the retailers of the application site.

72 Pimlico Road

13.46 No. 72 Pimlico Road is located on the north side of Pimlico Road, in proximity to the intersection with Holbein Place. The unit provides 100 sqm of Class A3 floorspace, which

although is physically large enough to support the smaller of the proposed Class A3 units, it is not considered that it would meet the commercial and operational requirements for the retailers of the application site in terms of servicing and deliveries.

103 Pimlico Road

- 13.47 No. 103 Pimlico Road is located on the south side of Pimlico Road, in proximity to the intersection with Holbein Place. The unit provides 80 sqm of Class A1 floorspace, which although is physically large enough to support the smaller of the proposed retail units, it is not considered that it would meet the commercial and operational requirements for the larger retailers of the application site.

105 Pimlico Road

- 13.48 No. 105 Pimlico Road is located on the south side of Pimlico Road, in proximity to the intersection with Holbein Place. The unit provides 80 sqm of Class A1 floorspace, which although is physically large enough to support the smaller of the proposed retail units, it is not considered that it would meet the commercial and operational requirements for the retailers of the application site.

Sequential Assessment Conclusion

- 13.49 The proposals seek to allow a healthy mix of uses to support and enhance the function of these areas while maintaining a balance with Class A1 uses, whilst also providing more convenience floorspace.
- 13.50 The Pimlico Road Local Shopping Centre predominantly consists of small traditional units. Such units are not suitable for predominantly bulky goods retail, which require large box type units to operate viably.
- 13.51 The Site is located on the edge of centre as defined by the NPPF and is extremely well connected to the Pimlico Road Local Shopping Centre. It would function as an immediate extension of it. There are no available sites that are reasonably available, viable and suitable, with the capacity to accommodate the overall quantum of the Proposed Development. In particular, the larger retail and leisure units proposed within the

development could not be accommodated within the small vacant units identified within the centre.

- 13.52 The provision of additional retail would additionally serve an important urban design and place-making function by contributing to active frontages to animate and secure the new public routes. It is considered that the site, as it is edge of centre and well connected, is appropriate for the proposed scale and form of retail and leisure development.
- 13.53 The proposals accord with Paragraph 86 and 87 of the NPPF, Planning Practice Guidance, and Policy S21 of the City Plan in respect of the sequential assessment.

Impact Assessment

- 13.54 The proposals would provide a total of 2,835 sqm (RICS GIA) of retail floorspace and 846 sqm (RICS GIA) of leisure floorspace, totalling 3,681 sqm (RICS GIA), and therefore a retail impact assessment is required for this proposal. This assessment has undertaken a quantitative assessment in accordance with the two tests set out in the NPPF as set out above.
- 13.55 This section considers the impact of the Proposed Development on the vitality and viability of local centres.

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal

- 13.56 This section explores the impact of the proposal on existing, committed and planned public or private sector investment in Pimlico Road Local Shopping Town Centre.
- 13.57 Redevelopment proposals for 41, 43, 57, 59 and 61-63 Pimlico Road are also being carried out by Grosvenor Estate Belgravia (the Applicant). The extant permission has been implemented and further construction is expected to commence in the summer.
- 13.58 The Proposed Development will create 2no. larger retail units along with 2no. smaller retail units, that are comparable with the size of the existing retail units. The proposed units will include 2 smaller units of 102 and 148 sqm GIA, along with 2 larger Class A1 retail units

of 984 and 1,121 sqm GIA. All of the units will be occupied by Class A1 retailers and will result in 815 sqm of additional non- food retail floorspace.

- 13.59 The Centre predominantly provides art galleries, furniture, antiques, interior and design shops. The centre's specialist art, antiques and design offer suggest that its customer base is mostly comprises people on a specialist shopping trip. Overall, the data indicates that the Pimlico Road Local Shopping Centre is a strong comparison centre with 62% of the total floorspace for comparison retail goods, which amounts to 6,080 sqm.
- 13.60 By comparison, the Centre only provides 70 sqm of permanent convenience retail floorspace. The Centre also provides some temporary convenience retail floorspace, with use of Orange Square as a weekly Saturday farmers' market with trading hours from 9am-2.05pm. The market supports 40 small and independent farming and food businesses with around 26-31 stalls each week. depending on the season and provides 400 sqm of temporary convenience floorspace. This permission expires on the 31 October 2023.
- 13.61 Therefore, due to the specialist nature of the Centre, whilst an important centre for antique and design, it lacks diversity. This finding was supported by local stakeholders and the local community at the public consultation events, who requested a greater number of convenience units in the Centre.
- 13.62 The proposals seek to extend and enhance the Pimlico Road Local Shopping Centre by diversify the retail offering, by providing a food store (Class A1), restaurants/cafes (Class A3), drinking establishments (Class A4) and a cinema (Class D2). The food store would increase the Centre's offering for everyday items like food, drink, newspapers and confectionery. A cinema would provide a low impact entertainment use, which will act as an anchor to draw people in, which would be supported and complimented by the restaurants/cafes (Class A3) and drinking establishments (Class A4). Furthermore, the cinema would support the evening economy.
- 13.63 The application also proposes to provide purpose-built retail, which would meet modern retailer requirements with flexibility for innovative retail formats that are sensitively designed and integrated into the area. The proposals will therefore offer a diversity of uses, which cater for a different market than the existing offerings in the Centre, which will

support increased footfall and will compliment rather than compete with the existing retail units.

13.64 Accordingly, the proposals would not have an impact on the planned redevelopment proposals for 41, 43, 57, 59 and 61-63 Pimlico Road to deliver additional comparison retail floorspace.

13.65 There are no other significant planned public or private sector investment proposals to deliver additional convenience or comparison retail floorspace within the catchment area that could be materially affected by the proposals of which we are aware.

b) Impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment

13.66 The Mayor of London's 2017 analysis of consumer expenditure and comparison goods floorspace need in London, included within the City Council's Evidence Base in support of the draft City Plan, concludes that, at 2015 prices, the comparison good turnover of the CAZ was approximately £7bn.¹⁰

13.67 The City Council has not undertaken its own assessment of retail trends within the City. We have therefore prepared our own outline assessment of the likely level of turnover within the existing Pimlico Road Local Centre.

13.68 The London Borough of Islington and Royal Borough of Kensington and Chelsea Retail Studies, as comparable central / inner London boroughs, have assessed turnover for comparison retail floorspace at £6,000/sqm and 5,800/sqm respectively in 2016.^{11 12} This is broadly consistent with the £8,700 /sqm blended figure for convenience and comparison retail (convenience generally trading at higher densities) in the 2017 GLA report.

13.69 A trading density of £5,900/sqm (at 2016 prices) has therefore been applied.

¹⁰ Consumer Expenditure and Comparison Goods Floorspace Need in London, Mayor of London, October 2017, Figure 27

¹¹ London Borough of Islington Retail and Leisure Study 2017, Carter Jonas, Paragraph 10.35

¹² Kensington and Chelsea: Retail and Leisure Needs Study Update, NLP, Paragraph 3.24

- 13.70 On the basis of the GOAD information set out above, there is currently 6,080sqm GIA of Class A1 retail floorspace within the Pimlico Local Centre, of which 6,010sqm is in comparison use. Assuming an 80% net-to-gross ratio this equates to a comparison goods net area of 4,808sqm GIA.¹³ Existing comparison turnover is therefore estimated at £28.3m.
- 13.71 In terms of Proposed Development's net sales floorspace, we have assumed 20% of the floor area to be ancillary, resulting in an 80% net sales floorspace. The total potential Class A1 floorspace, excluding the food retail unit, would, on the basis of the mix set out at Table 7.4, above, be 2,478sqm GIA.
- 13.72 Assuming this area traded at 80% efficiency and all the units were used as comparison retail, the net sales floor area would equate to 1,982 sqm. This would equate to £11.7m turnover (2016 prices).
- 13.73 For the purposes of this assessment we have assumed that half of the sales (50%) of the proposed net floorspace, equating to approximately £5.85m, will be diverted from Pimlico Road Local Town Centre with the remainder diverted from the CAZ.
- 13.74 A trade diversion of £5.85m from the CAZ is not materially significant in the context of its £7bn annual turnover. The proposal would have no discernible effect on the CAZ.
- 13.75 A trade diversion of £6.2m would equate to a c. 20% trade diversion from the total comparison spend for the Pimlico Road Local Shopping Centre, before the special characteristics of the centre are taken into account.
- 13.76 In practice, this is likely to be a very substantial over-estimate. This is because:
- i. A key objective of the proposals is to support the range of shops, services and community space provided, to address aspects of the local centre's offer that are currently deficient. It is hoped that this will improve footfall and potential widen the centre's attractiveness. The improved A3 offer, food store and cinema are examples of additional uses that the proposal will bring to centre. These are likely

¹³ Homes and Communities Agency, Employment Densities Guide 2nd Edition, Paragraph 2.8

to attract additional visitors to the Local Centre and improve its overall performance;

- ii. This estimate does not take into account the expenditure from the residents and staff within the Proposed Development itself. This is estimated by the Socio-Economic Chapter of the ES as potentially contributing £370,000pa in convenience expenditure and £300,000 - £1.1m pa in comparison expenditure. It also does not take into account significant increases in expenditure from the catchment area as the Chelsea Barracks site nears completion. The Town Centre Health Checks Report 2018-2019 recognises that this is likely to occur.
- iii. The existing centre has a strong antiques and design character and function. If, as is likely, the Proposed Development has a more general or balanced retail character, this would not cause significant trade diversion from the antique / design based retail in the current centre. The assumption that 50% of the retail expenditure is likely to be diverted from the existing centre is, therefore, likely to be a significant over-estimate. The specialist retail function is such that the existing centre is likely to function as a specialist destination, drawing visitors from well beyond its normal catchment, which would be unaffected by the proposal.
- iv. The estimate assumes all flexible space is used for Class A1 comparison shopping. It is likely that some will be used for alternative permitted uses.

13.77 In respect of comparison retail floorspace, we therefore conclude that the Proposed Development will not have an adverse impact on the overall vitality and viability of the centre. By diversifying its retail offer and offering additional amenities and shops and services in a close edge-of-centre location, the centre's attractiveness will be enhanced and improved.

13.78 The existing local centre has very little in the way of existing convenience retail or leisure function. Consequently, the introduction of convenience retail and leisure (restaurant and cinema) uses will not have a materially significant impact on the local centre as this demand is essentially not currently met within the centre.

Impact Assessment - Conclusion

- 13.79 The Proposed Development would have no materially significant adverse impacts on existing, committed and planned public and private investment into, or the vitality and viability of, either the Pimlico Road Local Shopping Centre or the Central Activities Zone. It is likely to support the centre's continued health and lead to improvements and diversification.
- 13.80 The Proposed Development therefore satisfies the requirements of paragraph 89 of the NPPF (2019).

14. Planning Consideration – Residential Quality

14.1 This section assesses the proposed residential units in design terms and considers the following:

- a) Residential density;
- b) Unit mix;
- c) Unit sizes and configuration;
- d) Amenity space;
- e) Accessibility;
- f) Aspect and privacy;
- g) Shared circulation.

a) Residential density

14.2 Policy GG2 of the London Plan encourages the intensification of the use of land to support additional homes and workspaces, promoting higher density development in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

14.3 London Plan Policies D1 to D4 place greater emphasis on a design led approach to ensure that development makes the best use of land, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of the surrounding infrastructure.

14.4 London Plan policy H8 (A) states that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

14.5 At a local level, Saved UDP Policy H11 states that the density of housing development should conform to the ranges of the zones shown on the proposals map. The site is located in Zone 2 where density should be between 250-500 habitable rooms per hectare.

14.6 There are various methods to calculate residential density. The simplest approach is to take the total site area and divide this by the total number of residential units to calculate a unit/ha figure and then calculate the habitable rooms per hectare in a similar manner.

14.7 This approach does not, however, take into consideration the fact that a significant proportion of the Site (namely Orange Square and Ebury Square) is not linked to residential development nor does it take account of the senior living accommodation, and this therefore dilutes the density calculation. Accordingly we have calculated the residential density with both the public spaces included and excluded for completeness. We have also provided a breakdown both inclusive and excluding the C2 senior living accommodation.

14.8 The site area for the whole development including Ebury and Orange Square is 1.77ha. This equates to a density of:

- i. 300 units in total for C2 and C3 use (169 per ha)
- ii. 200 units in total for C3 use only (113 per ha)
- iii. 675 habitable rooms for C2 and C3 (381 per ha)
- iv. 563 habitable rooms for C2 only (318 per ha)

14.9 If Ebury Square and Orange Square are removed from the site area for the purposes of calculating residential density the remaining Site Area is 1.35ha. This equates to a density of:

- i. 300 units in total for C2 and C3 use (222 per ha)
- ii. 200 units in total for C3 use only (148 per ha)
- iii. 675 habitable rooms for C2 and C3 (500 per ha)
- iv. 563 habitable rooms for C2 only (417 per ha)

14.10 The resulting density level is considered wholly appropriate for the Site considering the excellent transport connections. The resulting residential density across the Site is the by-product of the wider scheme aspirations to:

- i. optimise housing delivery on site in line with national, regional and local policy aims to boost housing supply.
- ii. develop a well-designed scheme which responds to the local townscapes and importantly reconciles the unique street conditions at this pivotal location,

offering the surrounding streets improved visual permeability and amenity and unlocking the potential of the existing public open spaces of Ebury Square and Orange Square to be used to their fullest potential by the community.

- iii. to provide a comprehensive mixed use development to allow a healthy mix of uses to support and enhance the function of these area
- iv. to activate the ground floor frontages and pedestrian links through the site
- v. to provide good quality homes with access to suitable levels of amenity space

14.11 As set out within this Planning Statement, the Proposed Development responds to all of these planning objectives and in doing so, the resulting residential density of the scheme can be considered wholly appropriate:

b) Unit mix

14.12 The scheme seeks to provide a range of unit sizes, with a significant amount being family sized accommodation.

14.13 London Plan Policy H10 advises that schemes should consist of a range of unit sizes. To determine the appropriate mix schemes should have regard to robust local evidence, providing mixed and inclusive neighbourhoods, the need to deliver a range of unit types, tenures, a mix of uses, the location of the site, optimising housing potential and freeing up family housing. The Mayor's Housing SPG states that development proposals should demonstrate how the mix of dwelling types, sizes and tenures meet strategic and local needs and are appropriate to the location.

14.14 At a local level, policy S15 of the City Plan encourages residential developments to provide an appropriate mix of units in terms of size, type, and affordable housing provision to contribute towards meeting Westminster's housing needs.

14.15 Saved UDP Policy H5(A) likewise seeks to ensure an "appropriate mix of unit sizes is achieved in all housing developments." Expanding on this, Saved Policy H5(b) "normally" requires the provision of at least 33% of residential accommodation as family sized, that is with three or more bedrooms. 5% of this provision should have five or more habitable rooms. Nevertheless, paragraph 3.74 acknowledges that a lower level of family

accommodation may be acceptable where the proposed housing is in a very busy, noisy environment.

14.16 Detailed pre-application discussions have taken place with City Council (Planning and Housing teams) and GLA officers in respect of residential mix, and the Proposed Development reflects these discussions

14.17 The proposed unit mix across the Proposed Development for C3 units within the Indicative Design Scheme is shown in the table below.

	Studio	1 bed	2 bed	3 bed	4 bed	5 Bed	Total
Number of market units	5	5	35	25	0	0	70
Number of intermediate units	0	33	12	4	0	0	49
Number of social rent units	0	11	13	16	3	1	44
Independent Senior Living Units	2	28	7	0	0	0	37
Total	7	77	67	45	3	1	200
Approx. % of Total	3.5%	38.5%	33.5%	22.5%	1.5%	0.5%	

Table 14.1 – Unit Mix

- 14.18 Within the context of the London Plan and the City Plan, the proposed unit mix reflect the local need for accommodation across a range of size, both now and in the future.
- 14.19 The Walden House residents have each had their housing needs assessed by the City Council's housing department and the provision of social rented accommodation reflects the mix required to accommodate those needs as sought in discussion with the Applicant by the housing department. The majority of the intermediate housing is smaller 1 and 2 bedroom units reflective of the demand for this type of accommodation from single people, couples and families with one child. The proposed mix of market housing is considered to appropriate for the area delivering both smaller studio, one and two bedroom units and larger family housing units.
- 14.20 Overall, the proposals would provide a good range of accommodation sizes, 24.5% overall family sized units. Within the market tenure, over 35% of the proposed units would be three bedroom family sized units.
- 14.21 As set out within this section of the Town Planning Statement, and in other submission documents, the residential units would be provided to an extremely high standard. They would provide a range of housing size options for residents.
- 14.22 **The proposed residential mix would provide a mix of unit sizes which would help to create a vibrant new community within the Proposed Development. The mix would deliver a significant amount of family housing alongside smaller accommodation.**

c) Unit sizes and configuration

- 14.23 London Plan Policy D6 requires that housing development should be of high quality design and provided rooms to meet the minimum internal space standards for residential accommodation are set out in London Plan Table 3.1. Layouts should be functional which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- 14.24 Section 3.6.6 of the London Plan states that housing developments should be designed to maximise tenure integration, and affordable housing units should have the same external appearance as private housing. All entrances need to be well integrated with the rest of the development and should be indistinguishable from each other.

- 14.25 The scheme has been designed to have separate buildings for the affordable and private units. This decision has been made following discussions with Registered Providers who have highlighted that having scattered units within multiple blocks presents financial and management challenges in terms of internally sharing service charge costs. Registered Providers have therefore advised that their preference is to have all the units located in one building. Furthermore, as the delivery of multiple cores and/or lift provision is not feasible due to site constraints, that single tenure affordable housing provision is acceptable in this instance.
- 14.26 In order to facilitate a right to return for the Walden House residents, with only one move, it is necessary for the replacement social housing (Building C) to be in the first construction phase of the development, alongside Building A. As the accommodation in the two buildings will be very different (one being senior living, the other being conventional housing) it would not be practical for these two tenure types to be mixed within a single building
- 14.27 Appendix 8.4 of the Design and Access Statement lists each proposed unit, by size, demonstrating that each unit exceeds the minimum nationally described space standard.
- 14.28 The scheme has been designed to maximise tenure integration in order to foster social integration. The Proposed Development incorporates the same high quality architecture across all buildings on a tenure-blind bases, so that there is no difference between the external appearance of the affordable units and the market/intermediate units.
- 14.29 **All residential units proposed across the scheme would meet the Government's minimum National Space Standards, ensuring high quality living environments for future residents, where appropriate, and as encouraged by the Mayor, residential units would exceed these minimum standards.**

d) Amenity space

- 14.30 The Proposed Development offers a variety of shared and private amenity spaces at different levels, offering diverse amenity for residents of the development, as well as visual amenity for visitors and the wider local community.

14.31 For outdoor amenity space, intend to publish London Plan Policy D6 (F9) requires a minimum of 5 sqm of private outdoor space for 1-2 person dwellings and an extra 1 sqm for each additional occupant. The amenity space should achieve a minimum depth and width of 1.5m.

14.32 Paragraph 2.3.32 of the Mayor's Housing SPG (2016) recognises that *"in exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement."*

Private Spaces

14.33 The provision of private outdoor amenity space has been carefully considered, and is based on an assessment of specific location, taking into consideration issues such as overlooking, impact on daylight and solar shading.

14.34 In summary, the balcony provision is as follows:

- i. Senior Living 28% projecting balconies / 72% Juliette balconies (as illustrated in application)
- ii. Private Housing – 86% balconies (60 units) / 14% Juliette balconies (10 units)
- iii. Affordable Housing – 22% balconies (20 units) / 78% Juliette balconies (73 units)

14.35 The approach to the provision of amenity space is explained below.

Building A

14.36 Building A incorporates projecting balconies overlooking Elizabeth Place. In all other locations, Juliette balconies are provided and the internal accommodation is oversized by the area that would have been provided by a balcony.

14.37 This strategy has been developed to ensure that the Proposed Development and, in particular, its frontage to Ebury Street, is consistent with, and enhances, its character and the setting of the Conservation Area, and to maximise daylight to the apartments overlooking the courtyard. Projecting or cantilevered balconies would not be consistent with the character of the area.

- 14.38 The Elizabeth Place elevation is not subject to the same constraints, allowing balconies to be incorporated.
- 14.39 All windows in Building A, with the exception of Elizabeth Place, are designed as Juliette balconies to ensure that residents are afforded the sense of connection and conviviality that balconies provide.
- 14.40 Shared outdoor amenity space within Building A is split between a generous courtyard garden located at first floor level, and a small south facing productive garden on the eighth floor. The proposals also include a secure courtyard for residents who suffer from dementia related conditions within the first floor podium.
- 14.41 The residents of Building A will have access to extensive shared outdoor amenity space equating to 985sqm in total. On the basis of the indicative unit mix for Building A within the application, (137 units) this equates to an additional 7sqm per unit in addition to the balcony space.
- 14.42 Building A residents will be provided with extensive indoor amenity space in the form of shared communal areas, such as lounges, card rooms, dining rooms and restaurants. These will be accessible to all residents within the building and will be a key part of the senior living concept. The communal spaces will be provided on each floor (Assisted Living Floors) and, in particular, at ground level.

Building B1

- 14.43 The strategy for private amenity space within Building B1 has been driven by a response to environmental conditions.
- 14.44 On Ebury Square, Juliette balconies are provided due to orientation and to prevent overshadowing within the apartments. Projecting balconies would not be appropriate in the local townscape context on this prominent corner. Recessed balconies, whilst potentially being less visually prominent, would reduce the daylight received to these units. Juliette balconies have therefore been provided and the apartments sized to ensure that they exceed minimum size standards plus the required balcony size. Therefore providing more useable internal amenity space.

- 14.45 On Avery Farm Row and Pimlico Road, inset balconies provide solar shading to these east and south facing facades.
- 14.46 Building B has a shared garden located at first floor level, providing amenity space for all residents of Buildings B1, B2 and B3.
- 14.47 The residents of Building B1 will have access to 530sqm of shared external amenity space at ground floor and podium level.¹⁴ This equates to an additional 7.5sqm per unit in addition to the balcony space provided.

Building B2/B3

- 14.48 Projecting balconies are only provided within the recessed bays on Pimlico Road. Elsewhere Juliette balconies are provided to every window, with apartments oversized by the equivalent balcony area. This will reduce the potential for overlooking across Elizabeth Place whilst reducing the potential for these apartments to be adversely affected by activity within the public realm.
- 14.49 The proposed building B3 sits directly next to Grade II listed Coleshill Flats on Pimlico Road and above the existing corner retail unit part of the Coleshill Flats. The proposed facade on Pimlico Road is designed to be set back from the existing street line of Coleshill Flats to expose the existing gable wall as it turns the corner, as well as the existing retail shop facade. Projecting balconies in this location would not be in keeping with the character of its context and would detract from the existing listed buildings.
- 14.50 The floorplan of Building B narrows as it approaches the Coleshill Building to respond to its relatively shallow configuration. The end of the Building B3 is occupied by a single dual aspect, three-bedroom, unit, with aspect both south-east and north west. Building B3 is not sufficiently wide, at its Coleshill end, to accommodate inset balconies and retain meaningful internal accommodation in this location.
- 14.51 It is considered that an appropriate strategy has been developed, which balances issues of character, overlooking and privacy, and environmental response.

¹⁴ This is the share of the Building B podium garden apportioned to the market tenure in Building B1. In practice, **both tenures within Building B1/2/3, ie intermediate and market, will have full access to the entire garden (660sqm).**

- 14.52 In addition to the balconies and Juliette balconies provided, and the first floor garden, a roof garden at fifth floor level on Building B3 provides additional shared amenity space for the residents of Buildings B2 and B3, as well as providing play space for these residents. This will provide 172sqm, plus an additional 130sqm at ground floor and podium level. This will provide an additional 6sqm of shared space per unit. The residents of this building will, in practice, have access to all of the shared podium between B1 and B2/3, rather than just the shared apportioned to B2/B3 for this calculation, thus increasing the area of space accessible to them further.

Building C

- 14.53 Within Building C all the proposed units are designed to exceed minimum space standard by an amount at least equal to the required amount of external amenity space. All units will have Juliette balconies.
- 14.54 Projecting balconies have been omitted from the Ebury Street frontage of Building C for the same reasons as Building A, that is, that they would not be in keeping with the prevailing townscape and architecture and adversely affect the setting of the Belgravia Conservation Area.
- 14.55 The proposed elevations within the interior of the site were designed with particular focus on the proximity of the existing listed Coleshill Flats rear elevations. Building C will appear as a backdrop of views of the two listed Coleshill buildings from Orange Square requires an appropriately calm architectural treatment so as not to adversely affect their setting.
- 14.56 The introduction of balconies to the proposed elevations would have had negative impacts in terms of overlooking and noise to the rear of the Coleshill Buildings which are, necessarily, close by. During the consultation process Working Group meetings were held with residents of the Coleshill Buildings and ways to minimise these impacts were discussed. These included avoiding incorporating balconies / outdoor private amenity space on the southern façade of Building C to reduce the potential for overlooking and disturbance.
- 14.57 The windows in Building C have been sized to avoid causing overheating and to mitigate solar gain. This is particularly important given the façade's orientation. Incorporating

balconies, either projecting or inset, combined with smaller window sizes on a southern façade, would have reduced the daylight levels within these units further.

14.58 On balance, taking account of the overheating/lighting, amenity and conservation factors, balconies have not been incorporated into the southern façade of Building C with additional internal space provided instead.

14.59 Building C has been designed without individual outdoor space to the apartments, responding to the close context of a conservation area. The equivalent of this area is included within the living/ dining spaces of each individual apartment. Additional outdoor amenity space for all residents is provided on Level 1, Level 4 and Roof Level.

14.60 The residents of Building C have access to a range of shared outdoor amenity spaces at multiple levels. Shared gardens are provided at first, fourth and seventh levels. The roof garden on the seventh floor also provides the residents' play space in addition to the shared amenity space within the individual buildings. This amounts to 404sqm, c. 9sqm per unit within Building C. This does not include the community and public garden space immediately to the south of Building C to which the residents of the development, and the Coleshill flats, will also have access. Building C's core will have an entrance/exit directly onto this space.

14.61 Building C will therefore have the highest level of shared amenity space per unit of the three buildings, in addition to access to the gardens immediately to the south of it and units that will exceed minimum internal space standard by an amount equivalent to the requirement for external amenity space.

14.62 A breakdown of the external shared amenity space, by building, is provided at Section 5.10 of the Design and Access Statement.

Building	No. Units	Shared Amenity (sqm)	External Space	Space / Unit (sqm)
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Building A ¹⁵	137	925	6.8
Building B1	70	530	7.6
Building B2/B3	49	302	6.2
Building C.	44	404	9.2

Table 14.2 External Shared Amenity Space, by building. Community gardens not included.

- 14.63 **Access to appropriate amenity space would be provided to all new residential units in line with Mayoral and City Council design standards.**

e) Accessibility

- 14.64 London Plan policy D5 requires that all new development achieves the highest standards of accessibility and inclusive design. London Plan Policy D7 requires that residential development provides at least 10% wheelchair user dwellings in accordance with Building Regulation requirement M4(3), and all other dwellings are accessible and adaptable dwellings in accordance with Building Regulation requirement M4(2).
- 14.65 Standard 15 of the Housing SPG requires that all dwellings at seventh floor and above should be served by at least two lifts. Whilst standard 16 of the Housing SPG sets out that it is desirable that every wheelchair user dwelling is served by more than one lift.
- 14.66 At a local level, saved UDP Policy H8 requires that 10% of the units should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

Assessment

Senior Living Accommodation

¹⁵ Based on the Indicative Design Scheme

14.67 Floors 1 to 4 are Assistive Living and will be designed to Approved Document Part M Volume 2 and in as much as is relevant to Approved Document Part M Volume 1, M4(3b) Category 3.

14.68 Floors above level 4 are Independent Living and will be designed to Approved Document Part M Volume 1, M4(3b) Category 3.

Residential Accommodation

14.69 Building B contains 119 dwellings made up of 70 private residential units and 49 intermediate residential units. Building C contains 44 social rent residential units.

14.70 90% of residential units will be designed to Approved Document Part M Volume 1 M4(2) Category 2. Additionally, 10% of residential units will be designed to Approved Document Part M Volume 1 M4(3b) Category 3. These units are spatially designed to be wheelchair adaptable, although will not be fitted out as such.

14.71 Designated wheelchair adaptable residential units are located so as to provide a variety of views and experiences.

14.72 Where balcony areas are provided for use by residents, they will be designed to be accessible with thresholds no greater than 15mm. Balconies are designed to the recommendations set out in Approved Document M Volume 1 and BS 8300.

14.73 The sanitary facilities within 90% of apartment types are designed to the recommendations set out in Approved Document Part M Volume 1 M4(2) Category 2.

14.74 The 10% of residences designed as wheelchair adaptable, will have at least one accessible bathroom which contains a level entry shower. All wheelchair adaptable apartments are designed to the recommendations set out in Approved Document Part M Volume 1 M4(3b) Category 3.

Senior Living Entrances

- 14.75 All external building entrances are level, step free and are either contained within a recess in the building façade or will be provided with a canopy as recommended in Approved Document Part M Volume 1.
- 14.76 All private residential entrance doors will have a minimum clear opening leaf of 850mm, all public entry doors will have a minimum clear opening leaf of 1000mm, as required by Approved Document Part M.
- 14.77 All glazed panels and doors will have visible and permanent manifestations applied to the surface, as required by Approved Document Part M.

Residential Access

- 14.78 Each floor within each Building is level, and step free. Access between floors is achieved by means of wheelchair accessible passenger lifts and stairs from circulation cores. Buildings A and B have three cores. Each core contains two wheelchair accessible passenger lifts and stairs and also provides access to the basement.

Retail and Workspace

- 14.79 Retail units and commercial space will be provided at ground floor level and accessed directly from the public realm. All unit entrances are step free. Internally all units are step free throughout
- 14.80 The basement level of the existing Grade II listed Coleshill Flats will be converted into 9 workspace units. Current access to the units is by existing external stairs only.
- 14.81 It is proposed step free access, to the 6 workspace units in the eastern block, will be provided by a wheelchair accessible lift and accessed from Clifford's Row. Access to the 3 workspace units in the western block, will be provided by a wheelchair accessible lift contained within Building C and accessed from the public pedestrian realm.
- 14.82 The workspace unit entrances are existing but will provide a minimum 750mm clear opening, which is within the parameters provided in Approved Document Part M.
- 14.83 The scheme has been designed to be fully inclusive throughout.

f) Aspect and Privacy

- 14.84 London Plan policy D6 (C) states that residential development should maximise the provision of dual aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to optimise site capacity through the design-led approach and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 14.85 Standard 28 in the Mayor's SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 14.86 All residential units have been designed to give the new residents appropriate levels of daylight and suitable living conditions, along with suitable levels of privacy. This is demonstrated within the submitted floorplans for the Development.
- 14.87 Standard 29 in the Mayor's Housing SPG require dual aspect units wherever possible. In particular, the Housing SPG states that north facing single aspect units, or units which are exposed to significant noise levels or which contain three + bedrooms should be avoided. The number of north-facing single-aspect units have been minimised and comprises less than 5% of the total residential development.
- 14.88 **The residential building layouts and dwellings have been designed to provide adequate levels of privacy and minimise the number of single aspect units, in line with residential design guidance.**

g) Shared Circulation

- 14.89 Standards 12-16 of the Housing SPG set out the requirements for shared circulation. Standard 12 requires that each core should be accessible to generally no more than eight units per floor. In terms of dwellings accessed by internal corridors, standard 14 states that the corridor should receive natural light and adequate ventilation where possible.
- 14.90 The proposals have been designed in accordance with the Housing SPG. Core in Building B1 serve three and five apartments each. Within Building B2 and B3 the Core serves eight apartments per floor. In Building C the lobby connects to two cores, each serving 2-6 units

per floor. The exact make up of the Senior Living accommodation within Building A will be confirmed at a later stage but all Independent Living Units will be accessed from a core with no more than eight units.

- 14.91 **This section demonstrates that the proposed residential units would be of excellent quality and would provide suitable living conditions for the new residents. Residential density is suitable for the site's location and unit mix and sizes are in line with relevant policies and standards.**

15. Planning Consideration – Public Realm and Landscaping

- 15.1 Integrating well-designed open and green spaces and improving the permeability of the Site has been fundamental to the design of the scheme.
- 15.2 The landscape architects have worked closely with the architects, City Council and relevant stakeholders to develop a landscape and public realm which is accessible, sustainable and functional and which complements the design of the built environment by providing spaces that maximise the enjoyment of and connection to the wider context,
- 15.3 Policy GG1 (E) of the Intend to Publish London Plan states that to help build strong and inclusive communities, development proposals should ensure that streets and public spaces and ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, foster a sense of belonging and where communities can develop and thrive.
- 15.4 In relation to public realm, Intend to Publish London Plan Policy D7 suggests that development proposals should:
- i. explore opportunities to create new public realm;
 - ii. ensure that the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to local context, and easy to understand and maintain;
 - iii. maximise the contribution that public realm makes to encourage active travel and movement;
 - iv. demonstrate an understanding of how people use the public realm and the types, location and relationship between spaces;
 - v. ensure that the public realm enhances the amenity and function of the surrounding buildings;
 - vi. ensure appropriate management and maintenance arrangements for the public realm;
 - vii. incorporate green infrastructure such as street trees and other vegetation;

- viii. ensure that appropriate shade, shelter and seating is provided, with other wind and microclimate considerations taken into account;
- ix. ensure that street furniture is designed and located to compliment the use and function of the space, and street clutter is minimised;
- x. create an engaging public realm for people of all ages with opportunities for social activities, formal and informal play and open street events;
- xi. ensure the provision and management of free drinking water in appropriate locations.

15.5 Intend to Publish London Plan Policy G4 also states that development proposals should not result in the loss of protected open space.

15.6 In terms of urban greening, Intend to Publish London Plan policy G5 states that this should be a fundamental element of site and building design. Development proposals should seek to achieve an Urban Greening Factor (UGF) score of 0.4 for major developments which are predominantly residential.

15.7 Intend to Publish London Plan Policy G7 (C) requires that development proposals should ensure that, wherever possible existing trees of value are retained. If the removal of trees is necessary, there should be adequate replacement based on the existing value of the benefits of the removed trees. The planting of additional trees should generally be included in new developments, particularly large-canopied species which provide a wider range of benefits.

15.8 At a local level, Policy S35 of the City Plan states that the council will protect and enhance Westminster's open spaces, their quality, heritage and ecological value, and work to develop further connections between open spaces. The council will seek to address existing public open space deficiencies, including active play space deficiency.

15.9 Saved UDP Policy ENV 17 details policy regarding Nature Conservation and Biodiversity. The preservation and enhancement of habitats and species protected in the Biodiversity

Action Plans is prioritised. The provision of features for the promotion of biodiversity in new developments is encouraged.

Summary of landscaping proposals

15.10 The landscape proposals have been developed based upon a set of primary design drivers:

- i. Recovering an historical thoroughfare through the site, which connects two important pieces of public realm in Orange and Ebury Squares;
- ii. Increasing public amenity across a site that is currently largely closed to those who are not residents of the Coleshill Flats, Cundy Street Flats or Walden House;
- iii. Improving softworks and planting for visual effect, which also supports a more robust green infrastructure and increased biodiversity.

15.11 Beyond a simple access route through the site, proposals include a new, large public garden at Elizabeth Place Gardens, and a new, flexibly-programmed, public square at Elizabeth Place. These landscape features ensure that high quality, publicly accessible spaces are accessible to visitors and contribute to broader public realm aims of the borough.

15.12 The works are described further below.

Orange Square

15.13 Orange Square is a small publicly accessible square at the heart of the local area comprising 1,200 m² (approx. 0.3 acres) bounded by vehicular roads on two sides and the Grade II listed Coleshill Buildings along its northern boundary. The square contains 8no. existing London Plane trees (*Platanus x hispanica*) ranging in height from 11m to 15m.

15.14 Proposed landscape works entail a refurbishment of the square and its furnishings: this will include in places lifting existing concrete pavers and laying yorkstone, cleaning and repointing of brick surfaces and planters, new suite of bench seating, Sheffield cycle stands, and bins.

- 15.15 Presently, the square hosts the Pimlico Road Farmers' Market on a weekly basis. Early discussion with the organisers has ensured that the same number of kiosks can be accommodated within the design proposals for so long as permission exists to host it.

Elizabeth Place Gardens and Coleshill Studios

- 15.16 Elizabeth Place Gardens is proposed to be a gated, publicly accessible garden nestled between the Coleshill Buildings in what is currently an under utilised asphalt-paved car park. The total area comprises 1,000 m² (approx. 0.25 acres) and contains 2no. existing scots pines (*Pinus sylvestris*) that are both approximately 29m in height, which are proposed to be retained. Other existing trees in this area are proposed to be removed as they are of poor quality and will be replaced with new, healthy specimens.
- 15.17 Proposed landscape works include a new, large water feature that offers pleasing reflective and sonic qualities, planting and trees, seating that is situated to minimise visibility to the rear facades of Coleshill Flats, and small courtyard gardens for the basement-level Coleshill Workshops. Elizabeth Place Gardens will therefore bring significant landscaping improvements to the area and urban greening to enhance wellbeing and health. Gates are proposed at each end of Elizabeth Place Gardens in order to close the gardens to public access in the late evening and overnight, to avoid anti-social behaviour and prevent adverse amenity effects on the residents of Building C and the Coleshill Flats.

Elizabeth Place, Five Fields Row and Clifford's Row

- 15.18 Elizabeth Place is a new, publicly-accessible square and thoroughfare rooted in historical development patterns. Until the 1950s, Elizabeth Place formed a direct connection between Ebury and Orange Squares, however, this was lost with post-war development of the Cundy Street Flats.
- 15.19 Landscape proposals aim to recover this central route through the site in addition to a lateral route via Five Fields Row and Clifford's Row. The location where these routes come together forms the heart of the project: a new public Square.
- 15.20 Shrub, herbaceous, and tree planting have been designed at Five Fields Row, opposite the address of Building C, and along the southern end of the heart that leads to Elizabeth Place Gardens. Landscape proposals also include a number of pots with planting that are

positioned in clusters along the length of the central route and a large, moveable seat-planter that allows for flexibility of programming.

- 15.21 The Grade II listed Anruld Johnston Obelisk - currently positioned within the paved courtyard of Walden House -- is to be re-located Five Fields Row, which maintains its public access and association with social housing provided within Building C.

Avery Farm Row

- 15.22 Avery Farm Row is an existing street connecting Ebury Square and Pimlico Road comprising approximately 550m² and bounded by the proposed Building B to the west and the existing Fountain Court to the east. The street benefits from the presence of the Grade II listed Marquess of Westminster Memorial Fountain, which is positioned upon a piece of pavement inset within the front gardens of Fountain Court.
- 15.23 The vehicular track at Avery Farm Row is realigned to maximise pedestrian area and create a new piece of public realm comprised principally of yorkstone pavements. In addition, the street will accommodate an existing cycle lane adjacent to the vehicular route on a raised table that will effectively expand the potential area for pedestrian movement. The Memorial Fountain is relocated to a central position that refocuses the gravity of the space. The existing yorkstone steps are to be refurbished and reinstated where possible, and the fountain itself is to be replumbed.
- 15.24 Proposed landscape works include planting 3no. *Gleditsia triacanthos* f. *inermis* at 8m height and 1no. *Quercus phellos* at 10m height. The trees are arranged informally so as to create a glade the marks this corner of the development site, enhances the environment of the listed monument, and forms a gateway to Ebury Square.

Ebury Square

- 15.25 Ebury Square comprises approximately 2,400 m² (0.6 acres) bounded by the development site to the south, a recently constructed residential development to the northwest, Semley Place to the northeast, and the Belgravia Police Station to the southeast. The square benefits from 13no. Mature London Plane trees (*Platanus x acerifolia*) ranging in height from 22m to 25m.

- 15.26 Proposed landscape works include removing asphalt path surfaces and re-laying a semi-permeable self-binding gravel path. This surface is fully accessible, low-maintenance, and can be designed to have minimal impact on existing tree roots. The existing centrally-located fountain is to be re-positioned to a prominent position on the southern end of the square so as to create a large, unprogrammed lawn at its heart. A playspace measuring over 450 m2 area is designed for the northern end of the square, offering public amenity for the neighbourhood and encouraging activation of the square by different users of varying age groups.

Assessment

- 15.27 The existing site does not offer any permeability for the wider community as the site is gated along Ebury Street, Cundy Street and Pimlico Road and is closed to public access. Whilst the site sits between Ebury Square and Orange Square at the confluence of many key local routes from Belgravia, Chelsea and Pimlico/Victoria, it is not currently a destination as it offers little to those passing by. The existing Site can be described as a void in terms of pedestrian flow.
- 15.28 Every opportunity has been taken within the development to enhance the public realm, to activate and open up the area, to create meaningful routes through the site and create a real sense of place. The public realm proposals will transform the current space and create an engaging environment for people of all ages offering opportunities for social activities and social interaction during the daytime, evening and night time.
- 15.29 The landscaping proposals have been designed to complement the proposed design to ensure that the buildings will activate and define the public spaces to provide activity and natural surveillance of the area and that the public realm enhances the amenity and function of the buildings.
- 15.30 Much thought has been given to the routes through and around the site, to improve pedestrian and cycle connections with the wider area particularly. The site sits on an important east-west route from Victoria to Chelsea and will offer a new quiet, safe public route, providing an important local connectivity. In addition, the site provides new routes through the local area heading south, where recent developments have arrived to replace the historic riverside uses. Chelsea Barracks will now join Grosvenor Waterside as significant destinations, along with Battersea Park and the Battersea Power Station which will be connected to Belgravia and Victoria through the Site on walking and cycling routes.

- 15.31 The improved urban setting of Orange Square and Ebury Square provides the opportunity to promote wider public realm improvement, creating coherence within the local area, improving the quality of the environment. This is complemented by the addition of two new smaller routes, the original Clifford's Row is reinstated next to the Coleshill Flats on the south, and Five Fields Row to the north.
- 15.32 The principal new route through the masterplan offers a new address: Elizabeth Place, reinstating a historical street name. This fine new mews creates the link between Orange Square and Ebury Square, as well as connecting to Pimlico Road and Ebury Street. A new green amenity, Elizabeth Place Gardens, offers further improvements along the new route at ground level.
- 15.33 An appropriate management and maintenance arrangement would be put in place for the public realm. This would include the closure of Elizabeth Place Gardens to non-residents in the late evening and night to prevent anti-social behaviour and disturbance to the amenity of the Coleshill Flats and Building C residents.
- 15.34 **The public realm proposals will help to create a new sense of place, enhancing the contribution of the Site to the wider area both during the day and night. Opportunities have been taken to improve Ebury Square and provide a high quality public space for the benefit of all. The landscape proposals would be delivered to the highest standards and are in accordance with planning policy objectives, with the importance of delivering attractive, legible and accessible public and private spaces being recognised at all policy levels.**

Playspace

- 15.35 London Plan Policy S4 requires that development proposals that are likely to be used by children and young people should increase opportunities for informal recreation facilities and opportunities. For residential development at least 10sqm of good quality accessible playspace per child should be provided, which provides a stimulating environment, can be accessed safely, forms an integral part of the neighbourhood, incorporates trees, is not overlooked to enable passive surveillance and not segregated by tenure.
- 15.36 The Mayor's Shaping Neighbourhoods Play and Informal Recreation SPG recommends a minimum of 10sqm of dedicated playspace per child. In terms of accessibility of the

playspace, table 4.2 sets targets for the walking distance from the residential unit as follows:

- i. Under 5s - 100m;
- ii. 5-11 years old - 400m;
- iii. 12+ years old - 800m.

- 15.37 Policy S35 of the City Plan states that the council will mitigating additional pressure on open spaces by securing new improved public open space in new developments; space for children's active play and seeking public access to private spaces.
- 15.38 The architectural scheme projects 82.3no. Children at the Proposed Development, each child requiring 10m², which yields a minimum area requirement of 823.1m² as follows.
- 15.39 In respect of delivery, Ebury Square qualifies as 'Doorstep Playable Space' for Buildings A and B as it is less than 100m distance away. Building C is located at 150m from the square so qualifies as 'Local Playable Space' for children aged 5-11,
- 15.40 The Proposed Development provides play space for different age groups across the Site. As set out in the landscape strategy section of the Design and Access statement, 314 sqm² of playspace for children under 5 and 287 sqm of playspace for children aged 5-11 is provided in accordance with the requirement. 45 sqm of the playspace for under 5s and 25 sqm of playspace for those children aged 5-11 is provided within the roof garden of Building B3. An additional 244 m² (40m² for children aged under 5 and 30m² for children aged 5-11) is provided on the roof garden of Building C.
- 15.41 15 sqm of youth space for children aged 12+ is provided on-site which represents 7% of the requirement of 223m². As the amount of recommended Youth Space is significant, it is not possible to accommodate on site; instead, it is proposed to offer an offsite contribution to upgrade existing Youth Space provision close to the Site.
- 15.42 **The proposals increase opportunities for play and informal recreation and provide a safe, accessible and stimulating play environment for different age groups in accordance with Policy S4 of the Intent to Publish London Plan. Based on the quantum and quality of playspace proposed, its location within the scheme and the**

range and variety of playspace types, the Proposed Development provides appropriate playspace in line with the London Plan and City Council requirements.

Existing vs Proposed Open Space

- 15.43 'Open Space' is defined as: 'all parks and gardens, regardless of size (whether public or privately owned); the Thames; the Canal; civic spaces; children's playgrounds; ball courts; open spaces in housing estates; and churchyards within the city's boundary. These included open spaces with private or restricted access. The study also took into account public indoor sports provision, public indoor play areas, and linkages between open spaces. The study did not include as open spaces: streets; private residential gardens (although private communal garden were included); school playgrounds; or purely landscape areas such as road verges, or strips of perimeter planting and housing estates'.
- 15.44 Based on this definition, the existing site comprises 6,219 sqm of open space, while the Proposed Development includes 5,970 sqm of open space. Although proposals entail an overall reduction in the amount of open space, this metric fails to capture the fact that the majority of the open space on the existing site is only privately accessible. The overwhelming majority of proposed open space on the development sit is publicly-accessible and more varied in type and function proposals have increased playspace and public square and decreased space that has no clear function.

Trees

- 15.45 The Intend to Publish London Plan Policy D8 public promotes the incorporation of green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity.
- 15.46 The Intend to Publish London Plan Policy G7 states that development should ensure that wherever possible, existing trees of values are retained or where the removal of trees is necessary, there should be adequate replacement based on the existing value of the benefits of the trees removed.
- 15.47 There are 98 existing trees on site. The proposals will require the loss of 74 trees including 11 B category trees, 60 C category trees and 3 U category trees.

- i. However, the loss of trees and vegetation has been considered and sufficiently mitigated with extensive new planting, landscape improvements and green infrastructure benefits to the wider public realm. The landscaping proposals incorporate 139 additional newly planted trees and would retain 24 of the existing trees. In total the scheme will therefore provide 169 trees, which is a 66% increase compared to the existing.

15.48 The proposed new trees will be provided in conjunction with various green roofs, areas of herbaceous planting, hedgerows and green walls to further provide green infrastructure benefits to the area. An indicative species list for the new trees is provided in section 5.16 of the Design and Access Statement and the indicative species list for the herbaceous planting is provided in section 5.17.

15.49 Elizabeth Place Gardens will create a green heart that is directly connected to Orange and Ebury Squares, which book-end the site, and benefit from a number of mature London Plane trees. Existing pavements along Ebury Street and Pimlico Road will be enhanced by street tree planting with light canopies that provide greening but allow light to penetrate to the ground plane.

15.50 In addition, tree planting is proposed atop podium and roof terrace gardens at first, second, fourth, fifth, sixth and eighth floors. These trees will be primarily small- to medium-sized -- with a couple of larger specimens -- which will soften the architectural facades and contribute visually to the public realm.

15.51 The proposed high-quality landscape design includes significant tree planting that will enhance the visual and ecological value of the site and have a positive impact on the character of the local area in the future.

15.52 **The proposed development complies with the requirements of planning policy as they relate to trees and suitable mitigation for tree losses can be successfully achieved through high quality landscaping and after care.**

Lighting

15.53 Lighting proposals have been developed to create spaces that are both aesthetically-pleasing and promote safety. This strategy requires a number of luminaires that have different light levels and methods of deployment within the landscape.

- 15.54 Bollard lighting is proposed for areas that have restricted access at night -- such as Elizabeth Place Gardens – while brighter, high-mounted fixtures are proposed for public realm areas that are accessible at all times of day.
- 15.55 **The landscape architects have worked closely with the architects, City Council and relevant stakeholders to develop a landscape and public realm which is accessible, sustainable and functional and which complements the design of the built environment by providing external spaces that maximise the enjoyment of and connection to the wider context.**
- 15.56 **The existing Site does not provide any public access and currently acts as a barrier. The Proposed Development will open up the Site through the creation of a number of attractive and varied thoroughfares and new open spaces. A significant amount of new green open space and amenity space will be provided, which can be enjoyed by new and existing local residents and visitors. A variety of play space has been provided. The public realm has been enhanced by trees and lighting.**
- 15.57 **The public realm and landscape proposals are in accordance with planning policy objectives, with the importance of delivering attractive, legible and accessible public and private spaces being recognised at all policy level**

16. Planning Consideration – Daylight, Sunlight and Overshadowing

16.1 Paragraph 127 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.

16.2 Paragraph 123 of the NPPF seeks to ensure the capacity of sites is optimised and resists the development of land at low densities. Paragraph 123(c) states, in respect of sunlight and daylight:

“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

16.3 Policy 7.6 of the London Plan states that planning decisions in respect of buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

16.4 Policy 7.7 of the London Plan states that ‘tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference.’

16.5 Intend to Publish London Plan Policy D6(D) states that the design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

16.6 Policy S29 of the City Plan seeks to resist proposals that result in an unacceptable material loss of residential amenity. Developments should aim to improve the residential environment.

16.7 Saved UDP policy ENV 13 encourages new development to enhance the residential environment of surrounding properties. The Council will normally resist proposals which

result in a material loss of daylight/sunlight particularly to existing dwellings. Development should also not result in an increased sense of enclosure, overlooking or overshadowing.

External Daylight / Sunlight

- 16.8 A Sunlight and Daylight Report has been prepared by GIA, along with a Sunlight and Daylight chapter within the Environmental Statement.
- 16.9 In respect of daylight, the GIA report sets out the relevant policy and technical guidance. It explains that the BRE Guidance on Daylight and Sunlight, and the Mayor's Housing SPG, both recognise that, in some instances, alternative assessment criteria will need to be used instead of, or in addition to, the generic criteria within the BRE Guidance. The BRE Guidance recognises that this is likely to be particularly appropriate where a development site is in a dense, or historic, urban location.
- 16.10 Consequently, GIA have developed alternative criteria against which to assess the proposals, alongside the standard criteria within the BRE guidelines. GIA have reviewed the daylight levels received to a range of properties within the vicinity of the site, described in section 6 of the report.
- 16.11 From this, the report concludes that the average daylight levels (measured on a VSC basis) received in surrounding properties are at, or above, 'mid-teen' levels.
- 16.12 GIA have, additionally, considered whether the majority of the room tested would retain a view of the sky at tabletop height. This is based on No Sky Line, rather than Visible Sky Component.
- 16.13 The existing block form of the site is not typical to the area, with four pavilion-style buildings set in space well back from the street edge, rather than buildings defining the edge of streets as is typical in Belgravia / Pimlico. This means that nearby buildings around the site currently enjoy higher levels of daylight than they would otherwise do were the site currently to be occupied by buildings with more typical Pimlico/Belgravia footprints and in line with the Site's historical pre World War 2 street pattern. Accordingly, GIA has also used a 'mirror massing' approach to test the extent of change that would occur were the current buildings on the site to be typical to the local area, with the same mass as the buildings opposite.

16.14 The report, firstly, identifies where some harm to the receipt of daylight and sunlight to neighbouring properties would occur. Where harm is identified, it then considers whether that level of harm is unacceptable.

16.15 The report concludes, overall, that 88% of the windows assessed would retain daylight levels consistent with those enjoyed by other surrounding properties in the wider area (that is, a mid-teens VSC level). This would increase to 92% when the unusual existing form of the site is taken into account by comparing the massing of the Proposed Development with a more typical massing on site, using the mirror massing methodology.

16.16 Those properties identified within the Daylight and Sunlight Chapter of the Environmental Statement as experiencing moderate adverse effects are:

- i. Fountain Court;
- ii. Nos 168, 170, 172 and 174 Mozart Terrace;
- iii. 89-110 Coleshill Flats; and
- iv. 67-88 Coleshill Flats.

Neighbouring Building	No. Windows Assessed	No. meeting assessment criteria ¹⁶	Comments on windows not meeting assessment criteria.
Fountain Court	99	88	Two windows are below overhanging balconies. The remainder retain an average of 13.5% VSC, close to the 'mid-teen' criterion.
No. 168 Mozart Terrace	13	11	Two windows located at basement level. These would retain VSC values of 13.1% and 11.8%
No. 170 Mozart Terrace	6	4	One window at basement level. First floor level will retain 14.4% VSC, close to 'mid-teen' criterion.
No. 172 Mozart Terrace	18	15	All at basement level.
No. 174 Mozart Terrace	10	9	Window at basement level, partially obstructed by access staircase.

¹⁶ I.e, VSC reduction of 20% and / or mid-teen VSC

89-110 Coleshill Flats	46	15	16 windows serve bedrooms with a lesser requirement for daylight. 9 serve small kitchens which would not be considered a habitable room. 6 serve living rooms in the north east corner, directly adjoined to the new development to continue the streetscape along Pimlico Road. Infill massing here is unavoidable to continue the streetscape.
67-88 Coleshill Flats	46	23	14 windows serve bedrooms. 5 windows serve small kitchens which would not be considered a habitable room. 4 windows serve living rooms. These are in recessed corners of the property and the sky view is almost fully obstructed by the return of the property itself. All windows currently have very low VSC in any case, 3 below 10% and one at 11.6%.

Table 16.1 – Summary results, VSC

Neighbouring Building	No. Windows Assessed	No. meeting assessment criteria¹⁷	Comments on windows not meeting assessment criteria.
Fountain Court	81	72	These are a single file of rooms closest to the development site. Average retained NSL of 44%
172 Mozart Terrace	8	1	Average retained NSL of 30%. This based on assumed room dimensions as no plans are available. The building currently has an uncharacteristically clear view.
170 Mozart Terrace	4	0	Upper floor rooms retain 48% - 49% NSL, close to 50% criterion. Basement and ground floor rooms currently have an uncharacteristically clear view.
168 Mozart Terrace	8	6	These rooms are at basement and ground level.
174 Mozart Terrace	7	0	All rooms above ground floor would retain an average of 46% NSL, close to the target of 50%. Ground floor room would achieve close to 40%.
89-110 Coleshill	34	17	14 rooms are bedrooms with lesser requirement for daylight. Remainder are

¹⁷ ie, NSL reduction of less than 20%, or retained NSL of 50%

			living rooms in the north east corner, directly adjoined to the new development to continue the streetscape along Pimlico Road. Infill massing here is unavoidable to continue the streetscape.
67-88 Coleshill	34	10	6 are bedrooms with lesser requirement for daylight. 4 rooms service living rooms that are located within a recessed corner with view impeded by the existing building.

Table 16.2 – Summary NSL results

- 16.17 In general terms, GIA note that the existing low density of the site and its relatively unusual form and massing will mean that redevelopment, with a greater mass in order to better optimise the use of the site and provide additional housing, which is a key objective of the proposals and in line with the NPPF, will inevitably lead to relatively larger changes to light levels to surrounding properties. However, the significant majority of properties affected will retain “sufficient levels” of light, as required by the Intend to Publish London Plan, based on comparison with light levels to other properties in the local area.
- 16.18 Where retained light levels fall below the mid-teen / 50% level, this is generally due to existing obstructions or the location of the relative window or room in question, either at ground floor or basement level, or with a particularly clear view across the site at present.
- 16.19 As sufficient light levels within this context are retained, the requirements of Policy D6 of the Intend to Publish London Plan are satisfied and an unacceptable material loss of amenity will not be experienced. The proposal is acceptable on this basis. As encouraged by Policy S29, the proposals will lead to improvements to the residential environment, through the benefits described elsewhere in this report and in respect of the Coleshill buildings in particular, the significant improvement to outlook and amenity brought about by the proposed new gardens and rationalisation and improvement of existing, substandard, waste and servicing arrangements.
- 16.20 The results of a reduction in height of 2-3 storeys have also been separately considered by GIA. GIA advise that this is likely to cause only minor variations to the light levels at the lower levels of adjacent buildings, demonstrating that the principal effects arises from the change in the block form and distribution of buildings on the application site and the re-

instatement of the traditional street frontages, rather than the overall mass or height of the proposals.

Sun on ground and overshadowing

- 16.21 The Internal Daylight, Sunlight and Overshadowing report prepared by GIA assesses the effect of the proposal on the proposed amenity areas within the development, specifically the courtyards within Building A, B and C, the rooftop gardens, and the gardens between the Coleshill Buildings.
- 16.22 The report concludes that the rooftop terraces and amenity spaces will exceed the BRE's guidance of receiving two hours of direct sunlight on the March equinox to at least half the space. All but one of the terraces will receive in excess of 6 hours of direct sunlight in June.
- 16.23 The courtyards will have more restricted sunlight during the winter and mid-season, although during spring and summer, when they are more likely to be used, they would receive good levels of light. This analysis is set out in Section 9 of the GIA report.

Internal Daylight /Sunlight

- 16.24 The GIA report also assesses the level of daylight and sunlight to be received by the proposed accommodation within the new development.
- 16.25 In respect of Building A (the senior living accommodation), this assessment has been based upon the layout shown indicatively in the planning application drawings.
- 16.26 The Proposed Development has evolved to improve the light levels within it. This has included making adjustments to the width of Building A and modifying the footprint of Building B to go from an enclosed courtyard to a C-shaped layout.
- 16.27 Of the total 702 habitable rooms illustrated 67% would receive light levels (Average Daylight Factor) in excess of those recommended by the BRE.
- 16.28 Of the 41 combined kitchen / living rooms / dining rooms not meeting the 2% ADF guideline set by the BRE, 17 would still exceed the 1.5% guideline for living rooms.

16.29 90 units would fall short of the BRE guideline by a small amount, 0.1% or 0.2%, and GIA conclude that they would be acceptably daylight given the urban setting. Collectively, this would amount to 80% of the units.

Building	Total	Achieving ADF	Achieving NSL	Comments
Building A	199	183	132	1 living / kitchen / diner achieves the ADF criterion for living rooms. 10 rooms are within 0.2 percentage points of the BRE guideline. Two of the remaining four rooms are large communal living rooms.
Building B	357	205	264	12 of the 27 living / kitchen / diners achieve the ADF criterion for living rooms. 153 rooms are within 0.2 percentage points of the BRE guideline for ADF. This equates to 258 rooms overall. Shortfalls are, elsewhere, caused by balconies.
Building C	146	81	91	4 living / kitchen / diners achieve the ADF criterion for living rooms. 26 rooms are within 0.2 percentage points of the BRE guideline for ADF. This equates to 107 rooms overall. Of the 39 remaining rooms, 24 are on the lowest two floors and are obstructed by the surrounding context. The remaining rooms do not meet guidelines because windows cannot be enlarged because of overheating and/or aspect to gardens.

Table 16.3 – Light within summary table

- 16.30 Similarly, 67% of the proposed 151 south-facing living rooms would meet the annual and winter recommendations for sunlight.
- 16.31 The GIA report advises that the light levels achieved within the Proposed Development are a natural consequence of balancing a range of design constraints. These include the overarching concept of the proposal, to reinstate the more traditional block and street pattern that existed prior to WW2 with new public routes through the site and streets defined by buildings adjacent to them, the provision of balconies and external amenity space and the need to avoid solar gain and overheating to improve energy efficiency and reduce carbon emissions.
- 16.32 The report concludes that the Proposed Development performs well on daylight, in line with expectations for a development in this location. The proposal will provide the good standard of amenity sought for future occupiers by the NPPF and will provide sufficient daylight and sunlight, both to the residential units themselves and to the associated amenity space, sought by Policy D6 of the Intend to Publish London Plan.

17. Planning Consideration – Transport and Servicing

Transport Planning Policy

17.1 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 108 of the NPPF states it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users;
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

17.2 Paragraph 110 of NPPF confirms applications for developments should:

- i. give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- ii. address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- iii. create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- iv. allow for the efficient delivery of goods, and access by service and emergency vehicles;

- v. be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

17.3 London Plan Policy 6.1 'Strategic Approach' examines the integration of transport and development and as such:

- i. Encourages patterns and forms of development that reduce the need to travel especially by car;
- ii. Seeks to improve public transport capacity and accessibility where it is needed, for areas of greatest demand and areas designated for development and regeneration, including the CAZ and Opportunity Areas;
- iii. Supports, in general, high trip generating development only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect levels of public transport accessibility;
- iv. Supports measures that encourage shifts to more sustainable modes and appropriate demand management; and
- v. Promotes walking by ensuring an improved urban realm.

17.4 London Plan Policy 6.3 states that "development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed". The policy also indicates that "transport assessments will be required in accordance with TfL's Transport Assessment Best Practice Guidelines for major planning applications. Workplace and/or Residential Travel Plans should be provided for planning applications exceeding the threshold in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans".

17.5 Policy 6.9 states that "the Mayor will work with all relevant partners to bring about a significant increase in cycling in London".

17.6 Policy 6.10 indicates that "the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle –promoting simplified streetscape, de-cluttering and access for all".

- 17.7 The Mayor's Transport Strategy, 2010 sets out policies and proposals to achieve the goals set out in the Plan. The Mayor's Transport Strategy sets a vision of London as an exemplary sustainable world city.
- 17.8 Intend to Publish London plan policy T2 requires that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. Whilst London plan policy T4 advises that transport assessments/statements should be submitted with development proposal, which focus on embedding the Health Streets approach within the development.
- 17.9 The strategic aims of the Local Plan are to promote more sustainable travel patterns and modes of transport and to improve conditions for walking and cycling.

a) Car Parking

- 17.10 In respect of car parking provision, Policy 6.13 of the London Plan, states that the Mayor, in conjunction with the London boroughs, will seek to ensure that an appropriate balance is struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. It also dictates that the maximum standards for parking as set out in the Plan should be applied to planning applications.
- 17.11 The Intend to Publish London plan policy T6(B) states that car-free development should be the starting point for all development proposals in places that are well connected by public transport. Intend to Publish London plan policy T6(E) also requires that car free development provide disabled persons parking.
- 17.12 For residential car parking, the Intend to Publish London plan policy T6.1(A) states that new residential development should not exceed the standards set out in table 10.3, which states that for the Central Activities Zone, development proposals should be car free. Disabled car parking should also be provided as follows:

- *"For three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available"*

- *Demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient.”*

17.13 Intend to Publish London plan policy T6.1(B) requires that parking spaces with communal car parking facilities should be leased rather than sold.

17.14 For electric car parking, Intend to Publish London plan policy T6.1 (C) requires that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

17.15 At a local level, Westminster’s saved UDP Policies TRANS 21-26 address the issues of parking within the City, with the Council’s parking standards (by land-use) contained at Appendix 4.2 of the document. The general policy direction is to reduce the overall level of car parking, while maintaining adequate availability of parking.

17.16 Saved policy TRANS 23 of the UDP requires that where appropriate off street parking to be accommodated at the maximum provision of:

- 1 space for 2 bedroom units or less.
- 1-2 spaces for 3+ bedrooms and the aggregate provision should not exceed 1.5 spaces per dwelling.

17.17 The emerging City Plan’s approach to residential car parking conforms to the London Plan principle of balancing new development with the prevention of excessive car parking that undermines cycling, walking, and public transport use.

Assessment

17.18 A Transport Assessment has been prepared by Momentum which assesses the likely transport implications arising from the Proposed Development and sets out the proposed parking and access arrangements. A Travel Plan has also been submitted to encourage sustainable modes of travel, and a delivery and servicing management plan.

17.19 The Site's highly accessible location, with several underground stations and bus routes in proximity, is reflected in its PTAL rating of 6b.

17.20 There are currently 83 existing car parking spaces on the site. 59 of the car parking spaces are allocated to Cundy Street Flats, and 24 Spaces to the Coleshill Flats.

17.21 Of the 24 existing spaces allocated to the Coleshill Flats, 23 would be removed and the existing Blue Badge parking bay would be relocated to Ebury Street.

Building A

17.22 The table below shows the maximum car parking provision in building A based on the standards set in the UDP.

Land Use	Standard Spaces	Disabled Spaces
C2 < 2 bedrooms	10	100
C3 < 2 bedrooms	35	7
Total	45	107

Table 15.1– Maximum car parking provision Building A

17.23 The proposals seek to introduce 18 car parking spaces associated with the senior living in Building A in Basement Level 1. Proposed parking for Building A would be split as follows:

- i. Two parking spaces for disabled staff associated with the C2 Assisted Living residential element, one marked space and one enlarged space;
- ii. One parking space for disabled visitors visiting C2 Assisted Living residents;
- iii. Four parking spaces reserved for C3 Senior Living disabled residents; and
- iv. Eleven general parking spaces for residential vehicles.

17.24 Car parking provision would therefore be provided at a much lower quantum than the maximum provision set out in the UDP, equating to approximately 0.13 spaces per residential unit. Residential disabled parking would be provided in line with the Intend to Publish London Plan.

17.25 Vehicles would access the off-street car parking via the vehicle lifts in the Building A internal servicing area. and demonstrate the access manoeuvre to the vehicle lift for a 5m vehicle. All vehicles accessing the Building A car park would be driven by valet drivers at all times.

Building B

17.26 The table below shows the maximum car parking provision in Building B based on the standards set in the UDP.

Land Use	Standard Spaces	Disabled Spaces
C3 < 2 bedrooms	45	9
C3 > 2 bedrooms	38	8
Total	83	17

Table 15.2– Maximum car parking provision Building B

17.27 Due to the high PTAL rating of the Site, it is proposed to provide a lower quantum of car parking spaces associated with the residential units in building B as Basement level 1. There would be 20 car parking spaces provided for the private residential units. Two of the car parking spaces would be disabled bays. The proposed basement car parking layout would enable five spaces to be converted to disabled parking if required in the future in line with the Intend to Publish London Plan.

17.28 There are no car parking spaces proposed for Building C.

- 17.29 All car parking for the Proposed Development would have passive electric-vehicle charging point (EVCP) capability, with 100% of spaces providing active EVCP provision, which is in line with City Council Air Quality Action Plan (2019-2024).
- 17.30 No general parking would be provided for the proposed non-residential land uses, in compliance with the Intend to Publish London Plan, the emerging City Plan and the UDP maximum parking standards for general parking.
- 17.31 The proposed parking provision does not meet the minimum disabled parking requirement of one on or off-street disabled parking bay for non-residential land uses required under each of these policy documents. However, adequate disabled parking is provided in the vicinity of the development site:
- i. Ranelagh Grove: 1 disabled bay (<100m from centre of site);
 - ii. Elizabeth Street: 2 disabled bays (<300m from centre of site).
- 17.32 The proposed off street car parking is therefore in line with the ambitions of the London plan policy 6.13 and Intend to Publish London Plan policy T6 to see an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- 17.33 Furthermore, section 3.2.8 of the Statement of Community Involvement notes that concerns about car parking has largely been absent from the feedback received at the public consultation.
- 17.34 In terms of on-street car parking, there are seven residential parking bays and a disabled car parking bay located on the southern section of Ebury Square. To allow for the proposed pick up and drop off area associated with building B it is proposed to relocate these spaces. The six residential bays would be relocated to Passmore Street and Ebury Street, whilst the disabled bay would be removed as the resident permit associated with this bay is no longer valid.
- 17.35 In addition, the 10 residential permit bays on the northern section of Cundy Street would be relocated to the existing pay and display spaces in the vicinity to ensure safety for highway users along Cundy Street.

b) Cycle Parking

- 17.36 Policy 6.9 states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London”.
- 17.37 London Plan Policy 6.13 also sets out that cycle parking should be provided in accordance with the minimum cycle parking standards set out in table 6.3.
- 17.38 Policy S41 of the City Plan requires that all development will prioritise pedestrian movement and the creation of a convenient, attractive safe environment. The supporting text states that sustainable transport, such as the provision of cycle facilities and the reduction in reliance on single person motor vehicles will be supported.
- 17.39 As part of the overall strategy to encourage use of alternative modes of transport to the car, the Council seeks to improve conditions for cyclists under saved UDP Policy TRANS 9 and pedestrians under saved UDP Policy TRANS 3.
- 17.40 Intend to Publish London Plan policy T5 (B) states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
- 17.41 Table 10.2 of the Intend to Publish London Plan outlines the minimum cycle parking requirements for each Use Class. The following table identifies the proposed Long Stay Cycle Spaces, based on the Intend to Publish London Plan standards.

Land Use	Long Stay Cycle Spaces	Location of Cycle Parking
Building A		
Residential (Class C2-type)	10	Building A
Residential (Class C3-type)	58	

Retail (Class A1) – Non Food	1	
Retail (Class A1/A3/A4)	3	
Building B		
Retail (Class A1) – Food	3	Building A
Retail (Class A1) – Non Food	1	
Retail (Class A1/A3/A4)	5	
Retail (Class A1/A3)	3	
Intermediate Residential (Class C3)	59	Building B
Private Residential (Class C3)	133	
Building C		
Retail (Class A1) – Non Food	2	Building A
Community (Class D1)	2	
Cinema (Class D2)	2	
Residential Affordable (Class C3)	83	Building C
Coleshill Basement	2	
Total	367	

Table 15.3– Proposed Long Stay Cycle Spaces

- 17.42 To meet the Intend to Publish London Plan standards, there will be 367 long stay cycle parking spaces provided within a dedicated cycle store at basement level. Cycle parking spaces will include two-tier racks.

Building A

- 17.43 It is proposed, to provide 90 long-stay cycle parking spaces at Basement Level 1 of Building A. Separate storage areas would be provided for staff within Building A, C3 Residents and non-residential land uses. The Building A staff cycle storage area and the non-residential cycle parking would be accessed via Five Fields Row, whilst residents would gain access to the C3 long-stay cycle parking storage via Elizabeth Place. Showers, changing facilities and lockers are also proposed at basement level adjacent to the cycle parking storage.

Building B

- 17.44 As part of the development proposals, 192 long-stay cycle parking spaces would be provided for Building B. At Basement Level 1, 192 residential long-stay spaces would be provided. The residential long stay cycle parking would be accessed from a dedicated entrance point on Avery Farm Row.

Building C and Coleshill Basements

- 17.45 In Building C, it is proposed to provide 85 cycle parking spaces at Basement Level 1. Residents would access long-stay cycle parking via Five Fields Row
- 17.46 In terms of short stay cycle parking, these should ideally be provided in the public realm within the boundary of the site, within a maximum of 15-20m from the proposed pedestrian entrances to the site. However, due to spatial constraints, a total of 92 short stay spaces would be provided. The short-stay cycle parking spaces would replace to shared use (residential permit and paid for) bays on the western side of Ebury Square.
- 17.47 This would result in a 63% provision of the quantum required by the Intend to Publish London Plan. Whilst this provision does not meet the Intend to Publish London Plan standards, it is not possible to provide any further additional short stay cycle parking due

to site constraints. Furthermore, the proposed short stay cycle parking would be sufficient to accommodate the forecast number of cycle trips to the development.

c) Servicing and Deliveries

- 17.48 Intend to Publish London Plan policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.
- 17.49 Policy S42 of the City Plan notes that developments should manage servicing and deliveries to minimise adverse impacts. Likewise, Policy TRANS 20 of the Unitary Development Plan requires convenient access for servicing vehicles and encourages off-street servicing. Provision should be adequate to cater for the size, type and anticipated frequency of arrival of vehicles.
- 17.50 Saved UDP Policy TRANS 20 states that The City Council will require convenient access to all premises for servicing vehicles and will, in most cases, require that the servicing needs of authorised development are adequately accommodated on-site and off-street preferably either behind or under new or converted buildings.
- 17.51 The existing site currently operates with no formalised loading area. Deliveries are currently accommodated within the development site from an access on Cundy Street. The site generates 22 delivery and servicing trips per day, equating to 12 vehicles.

Building A

- 17.52 For Building A, delivery and servicing trips, apart from food retail, would be accommodated within an internal servicing area in Building A. The servicing area would be located at ground floor level and would be accessed from Cundy Street.
- 17.53 A single loading bay would be provided and would be sufficient to accommodate the predicted number of delivery and servicing vehicles during the course of a day. The internal

servicing area is capable of accommodating an 8m vehicle. The loading bay would minimise the impact on pedestrians, cyclists and other highway users as no goods or waste are left on the highway.

17.54 The internal servicing area has also been designed to allow for delivery and servicing activity to be undertaken whilst vehicles are accessing and egressing the vehicle lifts to access the basement level car park.

17.55 For the C2 elements, it is anticipated that the internal servicing area would be required for use by removal vehicles, up to four times a week. This would be required for resident changeover. To accommodate this, it is proposed to allocate a 1.5-hour slot for removals vehicles on four occasions throughout the week. It is envisaged that two slots would be allocated on two separate weekdays and the remaining two slots would be allocated on a weekend.

17.56 It is estimated that there will be 22 delivery and servicing vehicles daily associated with Building A.

Building B

17.57 The internal servicing area in Building B would facilitate delivery and servicing trips associated with all land uses in Building B. Proposed vehicles would access Building B in forward gear via Pimlico Road. The internal servicing area is capable of accommodating an 8m vehicle.

17.58 The internal servicing areas have also been designed to allow for delivery and servicing activity to be undertaken whilst vehicles are accessing and egressing the vehicle lifts to access the basement level car park. Vehicles leaving the car park via the proposed vehicle lifts would be alerted when leaving the basement level car park in Building B to the presence of any delivery and servicing vehicles in the internal servicing area via a signal system.

17.59 It is estimated that there will be 42 delivery and servicing vehicles daily associated with Building B.

Building C and Coleshill Basement

- 17.60 Building C would be serviced from the proposed on-street loading pad on Ebury Street. The Coleshill Basement would also be serviced from the proposed on-street loading pad on Ebury Street as well as the proposed loading bay at the southern boundary of Orange Square.
- 17.61 Usage restrictions such as those present on Warwick Way in the City of Westminster (Goods Vehicles Loading Only, Mon-Friday 08:30-18:30, 30 minutes, no return in 1 hour) could be applied to help restrict use of the loading bay.
- 17.62 It is estimated that there will be 7 delivery and servicing vehicles daily associated with Building C, and 1 delivery or servicing vehicle daily associated with the basement of the Coleshill Flats.
- 17.63 Furthermore, in some instances, Elizabeth Place would be used to accommodate delivery trips associated with A1/3 and A3 Retail in Building A and Building B. This would provide additional capacity during the AM periods between 06:00 - 10:00.
- 17.64 The Proposed Development estimates that there will be a total of 72 vehicles daily, which is an increase of 60 vehicles to as a result of the net residential, retail and office floorspace. In line with Intend to Publish London Plan policy T7 which encourages efficiency, to reduce the number of trips to the site, it is proposed to consolidate non-food commercial deliveries by 50% and this would be built into a future management plan for the relevant tenancies.
- 17.65 In line with City Plan Policy S42, servicing and deliveries will be managed to minimise adverse impacts. As part of the delivery and servicing strategy time restrictions would be implemented as follows:
- i. Deliveries relating to food retail would be made between 06:00 – 10:00
 - ii. Deliveries relating to non-food retail would be made between 10:00 – 20:00
 - iii. Deliveries relating to community, leisure and office land uses would be made between 10:00 – 20:00

- iv. Deliveries relating to residential land uses would be made between 08:00 – 22:00

- 17.66 To manage the demand of vehicles using the internal servicing area a strict delivery booking schedule is proposed. This would enable all deliveries to be pre-booked with allocated time slots, to ensure that deliveries are evenly distributed across the servicing period and vehicle demand can be effectively managed.
- 17.67 A banksman would also be present at all times to ensure that only vehicles with a booked delivery slot would be able to use the loading bay. Any vehicle without a booking slot, would not be permitted access.
- 17.68 Further details are provided in the Delivery and Servicing Management Plan which has been prepared by Momentum and provided in Appendix F of the Health Streets Transport Assessment.

d) Waste and Recycling

- 17.69 Intend to Publish London Plan policy D6(E) requires residential development to provide adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as general waste.
- 17.70 Policy ENV 12 of the Unitary Development Plan required that all developments include the provision for the storage of waste. For extensions to commercial developments the Council will require off-street storage of additional waste produced.
- 17.71 At present, waste associated with the Coleshill building is currently stored in Eurobins to the south-west of the site adjacent to Orange Square. Waste generated by the Coleshill buildings is collected from Orange Square. Waste generated by the Cundy Street Flats is collected from the development via an access point on Cundy Street.
- 17.72 The waste and recycling generated by the development has been calculated in line with the City of Westminster Recycling and Waste Storage Requirements Guidance.

Building A

- 17.73 For Building A, a retail waste and recycling store would be provided at ground floor level, and the senior living waste and recycling store would be located at basement level. Due to the nature of the C2 use, clinical waste would also be stored in dedicated containers and collected by an approved contractor at a pre-arranged time.
- 17.74 Waste would be transferred to a temporary bin area in the internal servicing area by facilities management prior to collection. Collection would take place on Cundy Street. Waste collection would take place on-street as a refuse waste vehicle would be unable to exit the Building A internal servicing in forward gear.

Building B

- 17.75 For Building B, separate waste and recycling stores for the market and intermediate residential units will be provided at basement level, and a retail waste and recycling store will be provided at ground floor level.
- 17.76 Waste would be transferred to a temporary bin area in the internal servicing area by facilities management prior to collection. Waste collection would take place on Pimlico Road immediately adjacent to the vehicular access point to Building B. Waste collection would occur on street as refuse vehicles would be unable to exit the development site in forward gear.

Building C and Coleshill Basement

- 17.77 For Building C, the waste and recycling store for the social rent units will be located at ground floor level, along with the waste and recycling store for the basement retail / workshop units of the Coleshill Flats. In addition the Applicant has agreed to provide waste facilities for the existing residents of the Coleshill Flats in order to formalise and consolidate their existing arrangement.
- 17.78 Facilities management would be responsible for transferring bins from the internal commercial and residential storage areas to the on-street loading pad on Ebury Street. Bins would be temporarily stored adjacent to the on-street loading pad to reduce the distance required to transfer waste bins to the refuse collection vehicle. Facilities

management would be notified of the anticipated arrival time of the refuse vehicle to ensure that bins would only be kept on-street for the minimum amount of time immediately prior to and post collection.

- 17.79 Waste collections would be timed to avoid the peak pedestrian hour so as to maintain the quality of public realm provided by the development.

e) Pedestrians

- 17.80 In line with the Mayor's Pedestrian Comfort Guidance for London Document, a Pedestrian Comfort Level Assessment has been undertaken to assess the existing 2019 comfort levels for pedestrians at different locations around the site. The results of the Pedestrian Comfort Level assessment shows that all seven locations analysed for the Proposed Development, the Pedestrian Comfort Level scored an A+, which is very comfortable.
- 17.81 The bus stop will also be located further east on Pimlico Road. The bus shelter would be positioned to face towards the development site to prevent a pinch point between the edge of Building B and the bus stop, and not interrupt pedestrian flow on Pimlico Road in the east-west direction.
- 17.82 A framework Travel Plan has been provided as part of the Healthy Streets Transport Assessment in Appendix G. This will enable workers and visitors to make sustainable choices of transport and will encourage both walking and cycling.
- 17.83 **In summary, the transport impacts of the building can be satisfactorily accommodated, and appropriate refuse facilities are incorporated. It is considered that the Proposed Development complies with the relevant London Plan and City Plan transport policies.**

18. Planning Consideration – Other Technical Considerations

i. Flooding

- 18.1 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 18.2 Local Plans should also be supported by Strategic Flood Risk Assessments and develop policies to manage flood risk from all sources. Sequential tests should be used to steer development to areas with the lowest probability of flooding. Strategic Flood Risk Assessments will provide the basis for applying this test. If, following the application of the sequential test, it is not possible or consistent with wider sustainability objectives for development to be located in areas with a lower probability of flooding, the exception test should be applied if appropriate.
- 18.3 Chapter 14 of the National Planning Policy Framework recommends that SuDS should be utilised, where possible, within all new drainage schemes.
- 18.4 Policy 5.13 of the London Plan promotes the use of SUDS to reduce the contribution of climate change to flooding.
- 18.5 Policy CG6 of the Intend to Publish London Plan seeks to help London become a more efficient and resilient by ensuring that buildings are designed to reduce impacts from natural hazards like flooding.
- 18.6 Intend to Publish London Plan Policy S12 states that development proposals should ensure that flood risk is minimise, mitigated and the residual risks are addresses. The Proposed Development should aim to achieve greenfield run-off rates by maximising the use of above ground Sustainable Urban Drainage Systems (SuDS) in line with policy SI 13 of the London Plan.
- 18.7 Policy S30 of the City Plan states that all development proposals should take floor risk into account and new development should reduce the risk of flooding.

- 18.8 A flood risk assessment has been carried out by Heyne Tillet Steel in support of the planning application.
- 18.9 The flood risk assessment concludes that The Site lies in Flood Zone 1 and is therefore at a low risk of flooding from rivers and sea. As the site lies in the Flood Zone 1, all development is appropriate and therefore the sequential and exception tests are not required. Therefore, flood risk from rivers or sea is considered low.
- 18.10 The Site is also not located within a Critical Surface Water Location. There is no surface water flooding within the site for up to the 1 in 1,000-year event. The Site is also not located within the Strategic Flood Risk Assessment map of Flood Risk Zones. Additionally, the redevelopment of the site will introduce sustainable drainage systems (SuDS) which will provide a betterment of the surface water management at the site. Therefore, the surface water flood risk to the proposed site is considered low.
- 18.11 The Proposed Development will introduce a basement. To protect against surcharge of the neighbouring Thames Water (TW) sewer, all drainage within this level will be discharged via a pumped system. Drainage from above ground level will be routed towards the outfall at high level to reduce the reliance on pumped discharge. The most likely reason for sewer flooding onsite is due to capacity issues during heavy rainfalls within the TW network. The Proposed Development sees to reduce surface water runoff rates, as indicated in Section 5.1. Hence it will contribute towards reducing the risk of flooding from sewer within the neighbouring area. The risk from public sewer flooding is considered low.
- 18.12 The flood risk from artificial sources is also considered to be low.
- 18.13 A basement impact assessment has been prepared as part of this application submission to ensure minimum impact on groundwater. The risk from groundwater flooding is considered low
- 18.14 **A thorough review of flood data published has been undertaken. Site specific surveys were also reviewed. This exercise confirmed that the Proposed Development is at low risk of flooding from all sources.**

ii. **Air Quality**

- 18.15 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution

(paragraph 170e). Planning should seek to comply with national and local policies for controlling air pollution (paragraph 181).

18.16 Policy 7.14 of the London Plan states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality; promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least 'air quality neutral' and, where reduction measures are required, these are made on site.

18.17 Intend to Publish London Plan Policy SI 1 (B1) requires that development proposals should not:

- Lead to further deterioration of existing poor air quality;
- Create any new areas that exceed air quality limits; and
- Create unacceptable risk of high levels of exposure to poor air quality.

18.18 Policy SI 1 (B2) of the Intend to Publish London Plan requires that development proposals are at least air quality neutral, should use design solutions to prevent or minimise increased exposure to existing air pollution and should reduce impact on air quality during demolition and construction phases. Large scale development proposals subject to an EIA should consider ways to maximise benefits to local air quality and identify measures to design features that will be put in place to reduce exposure to pollution.

18.19 Policy S31 of the City Plan requires that air pollution is reduced through the building design stage and use of appropriate technology. Likewise, Policy ENV 5 of the Unitary Development Plan requires that new development does not result in an increase in air pollution.

18.20 The saved UDP policy ENV 5 also encourages development which minimises pollution and emissions and improves air quality, through the appropriate design of building features such as heating and ventilation.

Assessment

Construction Work

18.21 In terms of the impacts of construction work on dust emissions, the Air Quality Assessment in Chapter 11 of the Environmental Statement identifies that the site has the potential to be of high risk of dust impacts during construction activities. However, in accordance with London Plan Policy 7.14, appropriate site specific mitigation measures have been identified in section 11.4.1 of the Air Quality Assessment, which would greatly reduce or eliminate dust. These measures would be implemented during the construction works to minimise the generation of dust.

18.22 Overall, the Air Quality Assessment concludes that by taking account of the Site-specific SEMP to be implemented as mitigation, the likely effects of dust emissions from the construction works would be insignificant.

Construction Vehicle Emissions

18.23 For construction vehicle emissions, it is predicted that at Receptors 2 and 9 there will be direct, temporary, short to medium local effects of moderate adverse significance, whilst as Receptor 18 there would be direct, temporary, short to medium term local effects of minor adverse significance. However, the effect at all the other receptors would be insignificant.

18.24 The Air Quality Assessment therefore concludes that for construction traffic vehicle emissions for the Proposed Development *“using professional judgement and based on the severity of the impacts, the concentrations predicted at the sensitive receptors would not result in any new exceedances of the AQS objectives. Accordingly, the likely effect is Insignificant.”*

18.25 Furthermore, taking into consideration cumulative schemes, there may be a worsening of air quality should the construction of the development overlap with any other relevant cumulative schemes as a result of combined construction traffic emissions. However this would be temporary and would improve following the completion of the works.

The Completed and Operational Development

- 18.26 The effects on local air quality associated with the Proposed Development would likely result in changes to traffic flows associated with the development. The results indicate that the annual mean NO₂ would be exceeded at nine of the existing receptor locations.
- 18.27 Receptor 1 at St Barnabas School has the highest baseline level of NO₂ of all the existing receptors and is predicted to have the highest concentration of NO₂ following the completion of the development. However, it should be noted that the figures are generally higher than 2019 even in the 'without development' scenario due to the assumed growth in local traffic. Furthermore, the Air Quality report explains that the predicted results are worst case scenario and assumes there will be no reduction in background pollutant concentrations or emission rates in comparison to the base year. The actual concentrations are likely to be much lower due to reduced emission rates, and uptake of cleaner vehicles between now and 2028.
- 18.28 Overall, for annual mean NO₂, there would be direct, local effects of moderate adverse significance at receptors 1, 2 and 5, whilst there would be insignificant effects at all other Receptors. The Air Quality report therefore concludes that *"using professional judgement, and based on the severity of the impacts, the concentrations predicted at the sensitive receptors would not result in any new exceedances of the AQS objectives. Accordingly, the likely effect is Insignificant."*

Particulate Matter

- 18.29 For particulate matter, the annual mean concentrations of PM₁₀ and PM_{2.5} would not exceed the 2028 'without development' scenario. The Air Quality report concludes that the development would result in insignificant impacts for annual mean PM₁₀ and PM_{2.5} at all receptors.

Air Quality Assessment

- 18.30 New residents of the development will not be exposed to pollutant concentrations above the Air Quality Strategy Objectives set for human health. Accordingly, the Proposed Development would be suitable for new residents in terms of air quality.
- 18.31 An Air Quality Neutral Assessment has been undertaken. In line with Policy SI 1 (B2) of the Intend to Publish London Plan, the report concludes that *"the Development is*

considered to comply with the Air Quality Neutral building emissions and transport benchmarks, and therefore meets the requirements of the relevant Supplementary Planning Guidance and new draft London Plan.”

18.32 The Proposed Development is therefore considered to accord with the NPPF, London Plan policy 7.14, Intend to Publish London Plan Policy SI 1, Local Plan policy S31.

iii. **Noise and Vibration**

18.33 The NPPF contains guidance on noise management in planning decisions. Paragraph 180 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will ‘often create some noise’.

18.34 Policy 7.15 of the London Plan, ‘Reducing Noise and Enhancing Soundscapes’ aims to support the Mayor’s Ambient Noise Strategy. The reduction of noise resulting from developments, and screening of them from major noise sources, is sought under this policy.

18.35 Intend to Publish London Plan policy D14 states that development proposals should manage noise by:

- avoiding significant adverse noise impacts on health and life;
- reflecting Agent of Change principle;
- mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses;
- improving and enhancing the acoustic environment and promoting appropriate soundscapes;
- promoting new technologies and improved practices to reduce noise at source.

18.36 Policy S32 also requires developments to minimise the transmission of noise and vibration and ensure that development provides an acceptable noise and vibration climate for occupants.

- 18.37 Policy ENV 6 of the UDP requires that development includes sufficient design and operational measures to minimise emission of noise to protect surrounding noise sensitive properties. Policy ENV 7 sets out the Council's requirements for controlling noise from plant, machinery and internal activity.
- 18.38 An environmental noise survey and assessment has been undertaken for the Cundy Street Quarter development.
- 18.39 The results of the noise survey have been assessed against Local Authority requirements and guidance in BS 8233:2014. The assessment has also considered guidance provided in the 'Professional Practice Guidance on Planning and Noise' (ProPG) document.
- 18.40 When assessed against the initial risk assessment criteria of the ProPG, it has been found that the Proposed Development site, without any mitigation measures, is at 'medium' to 'high' risk of adverse effects from noise across a significant portion of the site (although in more sheltered areas of the site a low risk of adverse effects has been identified).
- 18.41 As such, an Acoustic Design Statement (ADS) relating mainly to the good acoustic design process undertaken for this project, internal noise levels and noise levels in external amenity areas has been completed.
- 18.42 Where appropriate, this ADS contains details of design and mitigation measures to reduce the impact of noise on residents of the Proposed Development. The key mitigation measures outlined in the ADS include:
- i Appropriate façade treatments (glazing etc.) to control internal noise levels and meet City Council planning requirements; and
 - ii A mechanical ventilation system so that façade openings are not required to provide whole dwelling ventilation.
- 18.43 **The assessment has found that through the use of appropriate glazing, façade construction and ventilation systems, the internal noise criteria of BS 8233:2014 can be met whilst whole dwelling ventilation is provided. Based on the assessment carried out in light of the guidance in the ProPG, subject to a suitable noise condition, the proposals are in compliance with planning policy**

- 18.44 A vibration survey has been undertaken to estimate potential ground borne noise and vibration (GBN&V) impacts on the Proposed Development as a result of the existing District
- 18.45 and Circle lines. It has been found that significant adverse impacts are unlikely to occur. The proposed site lies within the Crossrail 2 (CR2) safeguarding zone. Potential GBN&V impacts on the Proposed Development, as a result of the proposed Crossrail 2 (CR2) rail scheme, have been predicted in line with CR2 guidance.
- 18.46 It has been found that without mitigation the CR2 GBN criteria may be exceeded and this could result in adverse impacts.
- 18.47 Therefore, the proposed scheme includes GBN&V mitigation in the form of building foundation isolation. This mitigation is predicted to reduce GBN impacts to within CR2 guideline values and therefore significant adverse impacts as a result of GBN&V are unlikely. In addition, this mitigation will further reduce any GBN&V impacts on the scheme from the existing London Underground lines.
- 18.48 **In summary, a noise and vibration impact assessment has been undertaken and the proposed scheme has been designed to include noise and vibration mitigation so that City Council noise criteria are complied with Crossrail 2 GBN&V criteria are met; significant adverse noise and vibration impacts are unlikely to occur; and adverse noise and vibration impacts are minimised.**

19. Planning conditions, S106 Planning Obligations and CIL

Planning Obligations

- 19.1 Under Section 106 of the Town and Country Planning Act 1990 (as amended) local planning authorities have the power to enter into planning obligations with the applicant and any persons with an interest in the land to be developed as a means of mitigating any impacts of a development proposal.
- 19.2 In accordance with Regulation 122(2) of the CIL Regulations (as amended), and paragraph 56 of the NPPF, planning obligations should only be sought where they meet all of the following tests:
- i. Necessary to make the Proposed Development acceptable in planning terms;
 - ii. Directly related to the Proposed Development; and
 - iii. Fairly and reasonably related in scale and kind to the Proposed Development.
- 19.3 Paragraph 54 of the NPPF sets out that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition and indeed planning conditions should also only be added to a decision notice where this would make otherwise unacceptable development acceptable.
- 19.4 Policy S33 of the City Plan states that when negotiating planning obligations, the City Council will secure the mitigation of the directly related impacts of development; ensure the development complies with policy requirements within the development plan; and if appropriate, seek the provision or contributions for supporting infrastructure.
- 19.5 Guidance on planning obligations within Westminster was previously set out with an SPG (January 2008) though this has in effect been superseded by the CIL Regulations. The City Council has however recently released information in relation to the requirement for carbon offset payments within its Westminster Carbon Offset Fund Guidance (January 2020). In addition, within its Inclusive Local Economy and Employment interim guidance note (May 2019) the City Council sets out that it will negotiate developer contributions to make sure that as many people as possible are

able to access skills and training opportunities. The financial contributions are set out by development type, on a square metre basis, at appendix 1 of the document.

- 19.6 Given both the legal and policy position, as well as the nature of the proposals, the Applicant would be willing to enter into a legal agreement with the City Council to secure the reasonable and necessary planning obligations associated with the Proposed Development, should the City Council resolve to grant the proposals planning permission.
- 19.7 Potential draft heads of terms for inclusion within the legal agreement are set out below. These will be able to be discussed with the City Council once officers have been able to review the proposals in full and advise in relation to the matters which would need to be included within a Section 106 agreement in order to mitigate any impacts of the development proposal.
- 19.8 The potential heads of terms are listed below:
- a) Affordable housing;
 - b) Transport measures, including:
 - i. Highways and public realm works to be secured and then delivered through a subsequent section 278 agreement;
 - ii. Legible London Signage improvements;
 - iii. Relocation of the bus stop on Pimlico Road;
 - iv. Threshold levels.
 - c) If necessary, a carbon offsetting contribution
 - d) Inclusive Local Economy & Employment contribution;
 - e) Provision of community space;
 - f) Public art provision;
 - g) Provision of playspace within Ebury Square or off site contribution to reflect the shortfall in the policy requirement for 12+ playspace;
 - h) Environmental Inspectorate contribution;
 - i) The provision of affordable workspace / retail units at the lower ground floor of the Colehill Buildings, on the basis of a 50% market value over a twenty year period - though this would only be delivered were the residents in these existing flats to choose to voluntarily surrender their leases in which case their

Registered Provider landlord would offer them suitable alternative accommodation;

j) Section 106 monitoring costs.

Community Infrastructure Levy

19.9 On 6 April 2010, the Community Infrastructure Levy Regulations 2010 (as amended) came into force to fund the provision, improvement, replacement or maintenance of infrastructure required to support development, as set out within each Local Authority's Regulation 123 list (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund). CIL is generally triggered where there is an uplift in floorspace greater than 100 sqm and this development would clearly be CIL liable.

19.10 Only the new floorspace created would be liable for CIL as the existing buildings are currently occupied and meet the six months in three years vacancy test set out at part 1, schedule 1 of the regulations.

19.11 As set out by section 49 of the CIL Regulations (as amended), affordable housing can qualify for relief from CIL liability.

19.12 In London, CIL is charged at both a regional level, by the Mayor, as well as at a local level, by the City Council.

19.13 In terms of Mayoral CIL, the revised Charging Schedule referred to as MCIL2 is now used and given that this Site is within the Band 1 and Central London charging zones, it is payable at the following rates:

- i. Offices (Class B1) - £185 per sqm (plus indexation);
- ii. Retail (Class A uses) - £165 per sqm (plus indexation).
- iii. Other uses - £80 per sqm (plus indexation)

19.14 The Mayor has a CIL instalment policy in place whereby payments in excess of £100,000 can be made in two separate payments, the first within 60 days of the

commencement of development and the second within 240 days of the commencement of development.

19.15 Westminster adopted its CIL charging schedule on 1 May 2016. Based on its charging zone maps this Site is within the prime residential zone and the core commercial zone, which means that development would be charged at the following rates:

- i. Residential - £550 per sqm (plus indexation);
- ii. Commercial including all Class A use and offices - £150 per sqm (plus indexation);
- iii. Other uses – nil.

19.16 In terms of the City Council's CIL instalment policy, where the payment is in excess of £3 million 50% is required to be paid within 90 days of commencement, 25% within 180 days of commencement and the residual 25% within 360 days of commencement.

19.17 The CIL Regulations require apportionment of the City Council's CIL receipts between strategic infrastructure (70-80%), a neighbourhood portion (15-25%) and an administrative portion (5%). Accordingly, should planning permission be granted, there would be an opportunity for up to 25% of local CIL receipts from this development to be spent in agreement with the local Belgravia community.

19.18 The Proposed Development is sought to be phased to ensure that residents currently living within Walden House will be able to move flat only once, directly in to the new and improved accommodation at Building C. On this basis the development works would be phased as follows:

- i. Phase 1 – Demolition of the Cundy Street Flats;
- ii. Phase 2 – Construction of Buildings A and C;
- iii. Phase 3 – Demolition of Walden House;
- iv. Phase 4 – Construction of Building B.

19.19 The CIL Regulations allow planning permissions to be subdivided into phases for the purposes of making CIL payments to take into account schemes such as this which are delivered over a number of years and face particular issues in relation to cash flow and delivery of on-site infrastructure. Regulation 9(4) provides that each phase

of a phased planning permission is a separate chargeable development for CIL purposes and therefore would be liable for separate payments for each phase.

- 19.20 The PPG explains that local planning authorities should work positively with developers to allow large scale developments to be delivered in phases but that the principle of phased delivery must be expressly set out in the planning permission. On this basis CIL phasing plans are submitted as part of this application and we request that the planning condition below is added to the decision notice, should planning permission be granted:

“Prior to the commencement of development (including any demolition or site clearance), a phasing plan for the development proposal, including all buildings outlined on Drawings P20.004, P20.005, P20.006 and P20.007 (or any subsequent approved revisions thereafter), and the uses within, shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be implemented in accordance with the approved phasing plans, unless otherwise agreed in writing with the local planning authority”.

Planning Conditions

- 19.21 Paragraph 55 of the NPPF states that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to set out the pre-commencement conditions should be avoided unless there is clear justification.
- 19.22 As is standard practice in relation to proposals which are strategic in scale, planning conditions covering a range of topics would need to be agreed during the determination period, though commentary regarding conditions specific to these proposals is provided below.
- 19.23 As has been explained within the land use section of this planning statement, Building A has been designed to provide homes for older people and would be managed by a specialist senior living operator. It would consist of two different forms of senior living accommodation; independent living, which would be self-contained units encompassing a bedroom/s, bathroom and living room / kitchen / diner, and assisted

living, which would be studio-style units which would not be fully self-contained and be associated with an element of care. All units would have shared amenities including fitness facilities, a library, treatment rooms, dining rooms, lounges and treatment facilities. At this stage, as further market testing is required to inform the final product it is proposed that definitive details regarding the split between independent living and assisted living units, as well as the overall configuration of Building A, are secured by a planning condition, as worded below. This would also enable the mix between independent living and assisted living to be reconfigured post-completion to ensure that residents care needs are able to be met as they evolve.

“(A) Notwithstanding the details shown on drawings P20.099, P20.100, P20.101, P20.102, P20.103, P20.104, P20.105, P20.106, P20.107, P20.108, P20.109 and P20.110 to not commence above ground works on Building A, until details of the disposition of senior living accommodation and other permitted types of accommodation within Building A have been submitted to and approved by the Local Planning Authority.

(B) Building A must be built in accordance with the details approved.

(C) The total number of senior living units in Block A must always be between 91 and 142;

(D) Subject to (C) nothing in this condition prevents the reconfiguration of the mix of accommodation in Block A following occupation of Block A”.

- 19.24 To provide the City Council with comfort that a successful balance of uses would be delivered, it is sought to cap the maximum Class A3 floorspace at 750 sqm, maximum Class A4 floorspace at 150 sqm and the maximum Class B1 floorspace at 900 sqm. Accordingly, the Applicant would agree to the following conditions:

“The combined total floorspace falling within use class A3 of the Town and Country (Use Classes) Order 1987 as amended April 2005 (or any equivalent class in any order that may replace it) shall not exceed 750sqm”.

“The combined total floorspace falling within use class A4 of the Town and Country (Use Classes) Order 1987 as amended April 2005 (or any equivalent class in any order that may replace it) shall not exceed 150sqm”.

“The combined total floorspace falling within use class B1 of the Town and Country (Use Classes) Order 1987 as amended April 2005 (or any equivalent class in any order that may replace it) shall not exceed 900sqm”.

19.25 As set out with chapter 5 of this planning statement, the Proposed Development seeks to provide a range of high quality, publicly accessible open spaces across the Site, including a new pedestrianised link through the Site which would be known as Elizabeth Place and include a public square located at the centre of the development, Elizabeth Place Gardens as well as improvements to both Ebury Square and Orange Square.

19.26 TLG Landscape has prepared detailed landscaping proposals to ensure that these are deliverable, and the Applicant is committed these high quality hard and soft landscaping proposals. However to enable changes to the detailed landscaping works to be made in advance of these works starting, should planning permission be granted, it is requested that the drawings prepared by TLG Landscape are not listed on the decision notice as approved documents but that this is instead dealt with via an appropriately worded condition, as follows:

“You must apply to us for approval of details of the external public realm / landscaping as follows:

- i) A plan (at a suitable scale) showing the proposed hard and soft landscaping across the site;*
- ii) Samples of materials and facing materials of all elements of hard landscaping;*
- iii) External playspace;*
- iv) Planting mix in relation to all species;*
- v) Location and type of the 92 Sheffield stands.*

*You must not start work on these parts until we have approved what you have sent us
You must then carry out the work according to these details”.*

19.27 For ease of reference, we have listed all the proposed drawings which have been submitted for formal approval within Appendix C and the landscaping drawings, which are not for formal approval, within Appendix D.

20. Conclusions

- 20.1 Grosvenor Estate Belgravia proposes the comprehensive redevelopment of the Cundy Street Quarter for a significant mixed use residential-led scheme to create a new vibrant neighbourhood, comprising residential homes (including affordable homes), much needed senior living accommodation alongside a range of complementary commercial units and community facilities for use by the existing community and new residents. 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
- 20.2 The proposals have 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.
- 20.3 The proposals would generate significant planning benefits including:
- 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%¹⁸;
 - 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;
 - vi New shops and amenities including a small food store, restaurants and drinking establishments;

¹⁸ 47% of the habitable rooms, and units, not including Class C2-type assisted living accommodation within Building A.

- 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 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; £20m Community Infrastructure Levy contribution.

20.4 The proposals would accord with all layers of planning policy. The proposals are therefore acceptable in planning policy terms and there are no other material planning considerations that should prevent the scheme from being granted planning permission and listed building consent.

Appendix A

Glossary

Glossary

CAZ	Central Activities Zone
CIL	Community Infrastructure Levy
EIA	Environmental Impact Assessment
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
UDP	Unitary Development Plan
WCC	Westminster City Council

Appendix B

Planning History

Island site bounded by Cundy Street, Ebury Street, Pimlico Road

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
13 th February 1952	S.A.52	Full Planning Permission	The erection of a gardeners store in connection with the residential development of the site abutting upon Cundy Street, Ebury Street and Pimlico Road, Westminster.	No decision available	No date available	Yes	
10 th August 1950	T.P.6a 50/685	Full Planning Permission	The laying out of service roads and access thereto as indicated upon the plans submitted, as a deviation from the plans, already approved in respect of the redevelopment of the island site bounded by Cundy Street, Ebury Street and Pimlico Road, Westminster by the erection of block of flats.	Application Permitted	7 September 1950	Yes	
30 June and 21 September 1949	T.P.6a 4986	Reserved Matters	Approval to detailed drawings submitted of the proposed building relating to the re-development of the island site bounded by Cundy Street, Ebury Street and Pimlico Road, Westminster, by the erection of blocks of flats and the provision	Application permitted	No date available	Yes	

			of a shop on the ground floor of Block No.4.				
18 October 1948	T.P.6a 2740	Outline Planning Permission	In principle, the redevelopment of the island site bounded by Cundy Street, Ebury Street and Pimlico Road, Westminster by the erection of blocks of flats as shown on schemes A and b	Application permitted	10 March 1949	Yes	

Lochmore House, Cundy Street, London, SW1W 9JX

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
Thu 14 Apr 2016	16/03395/TCA	Applic. for works to trees in CA	1 x Amelanchier sp. (Snowy Mespilus) - T44. Fell. 1 x Acer platanoides (Norway Maple) - T52. Lift low canopy for pedestrian clearance.	Application Withdrawn	Thu 21 Apr 2016	No	
Fri 20 Nov 2015	15/10810/TCA	Applic. for works to trees in CA	Amelanchier sp. -Access to inspect base - Restricted / obscured. Base / stems obscured - Vegetation. Die-back - Mid crown. Deadwood - Major. Multi-stemmed. growing in shrub bed.	Application Withdrawn	Fri 20 Nov 2015	No	
Wed 12 Oct 2011	11/09850/FULL	Application for full Planning Permission	Installation of 184 photovoltaic solar panels at roof level on the four residential buildings (Lochmore House, Kylestrome House, Stack House, Laxford House) and associated ancillary works.	Application Permitted	Mon 16 Jan 2012	Yes	

Kylestrome House, Cundy Street, London, SW1W 9JT

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
Wed 12 Oct 2011	11/09850/FULL	Application for full Planning Permission	Installation of 184 photovoltaic solar panels at roof level on the four residential buildings (Lochmore House, Kylestrome House, Stack House, Laxford House) and associated ancillary works.	Application Permitted	Mon 16 Jan 2012	Yes	

Laxford House, Cundy Street, London, SW1W 9JU

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
Fri 29 Apr 2016	16/03975/TCA	Applic. for works to trees in CA	T95 Paulownia tomentosa (Foxglove Tree) - Reduce crown to previous most recent reduction points	Application Withdrawn	Fri 06 May 2016	No	
Wed 12 Oct 2011	11/09850/FULL	Application for full Planning Permission	Installation of 184 photovoltaic solar panels at roof level on the four residential buildings (Lochmore House, Kylestrome House, Stack House, Laxford House) and associated ancillary works.	Application Permitted	Mon 16 Jan 2012	Yes	
Wed 15 Sep 2010	10/07869/FULL	Application for full Planning Permission	Erection of two storey extension at roof level to the annexe of Laxford House adjoining Walden House to accommodate four residential units.	Application Permitted	Tue 10 May 2011	No	
Fri 25 Jul 2008	08/06585/FULL	Application for full Planning Permission	Erection of two storey extension at roof level to the annexe of Laxford House adjoining Walden House, to accommodate two additional residential flats.	Application Permitted	Thu 02 Oct 2008	Yes	
Mon 19 May 2003	03/03924/TCA	Applic. for works to trees in CA	1 x Cherry: fell.	Application Withdrawn	Wed 11 Jun 2003	No	

15 th November 1966	TP/4862	15 th November 1966	The conversion of the ground floor recreational room and ancillary accommodation at Laxford House, Cundy Street, S.W.1 into a two room self-contained residential flat.	Application Permitted	29 December 1966	Yes	
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Stack House, Cundy Street, London, SW1W 9JS

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
Wed 12 Oct 2011	11/09850/FULL	Application for full Planning Permission	Installation of 184 photovoltaic solar panels at roof level on the four residential buildings (Lochmore House, Kylestrome House, Stack House, Laxford House) and associated ancillary works.	Application Permitted	Mon 16 Jan 2012	Yes	

Walden House, Pimlico Road, London, SW1

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
15 November 2010	10/10077/FULL	Full Planning Permission	Installation of a satellite dish (Flat 7)	Application permitted	10 January 2011	Yes	
Wed 12 Sep 2007	07/08017/FULL	Full Planning Permission	Installation of satellite dish on chimney breast at roof level. (Flat 5)	Application Permitted	Thu 13 Dec 2007	Yes	
Thu 26 Jul 2007	07/06575/COFUL	Full Application for Council's Own Dev.	Replacement of existing windows with powder coated double glazed tilt and turn windows on the front and rear elevations.	Withdrawn	n/a	No	
Wed 30 Mar 1988	88/01678/COFUL	Full Application for Council's Own Dev.	DEMOLITION OF CHIMNEYS, ALTERATIONS TO WINDOWS AND INSTALLATION OF 3 FIRE ESCAPE HOUSINGS, 3 GLAZED ENTRANCE SCREENS AND 40 BALANCED FLUE TERMINALS	Permitted w. Conditions HISTORIC	Wed 03 Aug 1988	No	

Coleshill Flats, 20-30 Pimlico Road, London, SW1W 8LL

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
21 August 2017	17/07493/TCA	Application for works to trees in CA	T1-Holly: Remove regrowth formed since most recent reduction T2- Holly: Remove regrowth formed since most recent reduction T3- Cotoneaster: Remove deadwood T5- Cherry: Remove regrowth formed since most recent reduction T6- Holly: Crown lift 2.5m T7- Pine: Remove major deadwood T8- Pine: Remove major deadwood T11- Cotoneaster: Remove deadwood	Application permission	29 September 2017	No	
Tue 25 Oct 2016	16/10215/FULL	Application for full Planning Permission	Replacement of entrance gates. (Linked application 16/10216/LBC)	Application Permitted	Thu 08 Dec 2016	Yes	
Tue 25 Oct 2016	16/10215/LBC	Application for Listed Building Consent	Replacement of entrance gates. (Linked application 16/10215/FULL)	Application Permitted	Thu 08 Dec 2016	Yes	

02 Oct 2015	15/09251/FULL	Application for Full Planning Permission	Infilling existing external door opening at lower ground level (91 Coleshill Flats)	Application Permitted	8 Dec 2015	Yes	
16 Oct 2015	15/092189/LBC	Application for Listed Building Consent	Infilling existing external door opening at lower ground level (91 Coleshill Flats)	Application Permitted	7 Dec 2015	Yes	
Wed 09 Jul 2014	14/06631/TCA	Applic. for works to trees in CA	<p>1 x Holly (T1): Crown reduce by up to 2m. Crown thin by 10%</p> <p>1 x Holly (T2): Crown reduce by up to 2m. Crown thin by 10%</p> <p>1 x Cotoneaster: Crown lift by up to 2.5 m. Crown thin by 20%</p> <p>1 x Cherry (T5): Crown reduce by 2m. Crown clean and remove deadwood.</p> <p>1 x Cherry (T6): Crown reduce by 2m. Crown thin by 10%</p> <p>1 x Pine (T8): Crown lift to 2.5 m. Crown clean</p> <p>1 x Pine (T9): Crown lift to 2.5 m. Crown clean</p> <p>1 x Cherry (T11): Crown lift to 2.5 m. Crown thin by 20%</p> <p>1 x Holly (T2): Crown lift to 2.5 m. Crown thin by 20%</p> <p>1 x Cotoneaster (T13): Crown lift to 2.5 m. Crown thin by 20%</p> <p>1 x Holly (T17): Crown lift to 2.5 m. Crown thin by 20%</p>	No objections	Tue 09 Sep 2014	No	

			1 x Holly (T18): Crown reduce by up to 2m. Crown thin by 10% 1 x Laburnum (T20): Crown reduce by up to 1m. Crown thin by 10% 1 x Cherry (T22): Crown lift to 2.5 m. Crown thin by 20%				
Wed 13 Jun 2012	12/06088/LBC	Listed Building Consent Application	Fill in redundant flues at the rear of 1-110 Coleshill Flats with new brickwork to match existing.	Application Permitted	Mon 06 Aug 2012	No	
Tue 21 Feb 2012	12/01910/FULL	Application for full Planning Permission	Fill in redundant flues at the rear of 1-110 Coleshill Flats with new brickwork to match existing.	Application Permitted	Mon 06 Aug 2012	Yes	
Tue 14 Jun 2011	11/05585/NMA	Application Permitted	Amendments to planning permission dated 07 January 2011 (RN: 10/09234) for installation of eight bike sheds within the enclosed courtyard namely, alterations to the design of the bike sheds on the Estate.	Application Permitted	Tue 27 Sep 2011	Yes	
Wed 16 Mar 2011	11/02411/FULL	Application for full Planning Permission	Installation of four satellite antennas, two television aerials and cabling to Coleshill Flats on Pimlico Road and Ebury Street.	Application for full Planning Permission	Wed 06 Jul 2011	Yes	
Mon 28 Feb 2011	11/01869/LBC	Listed Building Consent Application	Installation of four satellite antennas, two television aerials	Application Permitted	Wed 06 Jul 2011	Yes	

			and cabling to Coleshill Flats on Pimlico Road and Ebury Street.				
Tue 25 Jan 2011	11/00636/ADLBC	Approval of Details (ADLBC)	Sample of the existing bricks to the upper plant rooms covered with traditional soot wash pursuant to Condition 1 of planning permission dated 31 August 2010 (RN:10/00875).	Application Permitted	Wed 02 Feb 2011	Yes	
Mon 25 Oct 2010	10/09236/LBC	Listed Building Consent Application	Installation of eight bike sheds within the enclosed courtyard.	Application Permitted	Fri 07 Jan 2011	Yes	
Mon 25 Oct 2010	10/09234/FULL	Application for full Planning Permission	Installation of eight bike sheds within the enclosed courtyard.	Application Permitted	Fri 07 Jan 2011	Yes	
Thu 30 Sep 2010	10/08697/TCA	Applic. for works to trees in CA	<p>1 x holly (T1): Reduce crown by 20%, lift to 2.5-3m</p> <p>1 x holly (T2): Reduce crown to same size as T1, lift to 2.5-3m</p> <p>1 x cherry (T5): Remove crossing branches & reduce crown by 20%,</p> <p>1 x cherry (T6): Reduce crown by 20% & thin crown by 10%</p> <p>1 x cotoneaster (T11) remove basal growth, thin, deadwood & lift</p> <p>1 x holly (T17): Reduce crown by 10%</p> <p>1 x holly (T18): Lift canopy and</p>	Pending	Pending	No	

			<p>reduce crown by 10%.</p> <p>1 x laburnum (T20): lift canopy to 2.5m, remove basal wood growth & deadwood</p> <p>1 x cherry (T22): Clean crown and thin crown by 10 %. Remove limb and cut back from roof</p> <p>1 x cherry (T23): Lift canopy and reduce crown by 15%</p>				
Fri 26 Feb 2010	10/01607/FULL	Application for full Planning Permission	<p>Refurbishment of Flat 8, 14, 15, 18, 20, 22, 33, 38, 40, 42, 43, 50, 53, 54, 55, 61, 64, 65, 66, 75, 80, 82, 84, 85, 88, 93, 98, 104 and 108. Installation of various external boiler flues for central heating system, internal works comprising central heating, new kitchen and electrics.</p> <p>Construction of new lobby in kitchen and internal reconfiguration for kitchen to go in part lounge in various properties in order to comply with Fire Regulation. Existing doors retained and upgraded with intumescent paint and seals.</p>	Application Permitted	Tue 31 Aug 2010	Yes	
Thu 04 Feb 2010	10/00875/LBC	Listed Building Consent Application	Erection of rear parapet wall at Nos. 1-44 and 44-110, partially blocked windows on rear	Application Permitted	Tue 31 Aug 2010	No	

			elevation and internal works to Flats 6 and 10. [Retrospective application].				
Mon 01 Feb 2010	10/00756/LBC	Listed Building Consent Application	Refurbishment of Flat 8, 14, 15, 18, 20, 22, 33, 38, 40, 42, 43, 50, 53, 54, 55, 61, 64, 65, 66, 75, 80, 82, 84, 85, 88, 93, 98, 104 and 108. Installation of various external boiler flues for central heating system, internal works comprising central heating, new kitchen and electrics. Construction of new lobby in kitchen and internal reconfiguration for kitchen to go in part lounge in various properties in order to comply with Fire Regulation. Existing doors retained and upgraded with intumescent paint and seals.	Application Permitted	Tue 31 Aug 2010	Yes	
Mon 09 Nov 2009	09/08996/LBC	Listed Building Consent Application	Installation of new and replacement emergency lighting fitting to all five blocks.	Application Permitted	Tue 12 Jan 2010	No	
Mon 10 Jul 2006	06/05422/LBC	Listed Building Consent Application	Reorganisation of internal layout to flat numbers 32, 36, 37, 41 and 67, to accommodate new kitchens and bathrooms and general refurbishment. Site	Application Permitted	Thu 17 Aug 2006	Yes	

			includes 20-30 Pimlico Road and 225 to 231 Ebury Street.				
Fri 07 Oct 2005	05/08321/TCA	Applic. for works to trees in CA	<p>1 Holly Crown lift 2.5m, crown reduce 0.5-1.0m to shape</p> <p>2 Holly Crown lift 2.5m, crown reduce 0.5-1.0m to shape</p> <p>5 Cherry Crown reduce 20%, crown thin 10%, crown lift 3m, shape</p> <p>6 Cherry Crown reduce 20%, crown thin 10%, crown lift 3m, shape</p> <p>7 Cherry Crown thin 10%, crown lift 3m, shape</p> <p>9 Pine Crown lift 3m</p> <p>10 Cherry Crown reduce 20%, crown thin 10%, crown lift 3m, shape</p> <p>17 Holly Cut back, crown lift 2m and shape</p> <p>18 Holly Cut back, crown lift 2m and shape</p> <p>20 Laburnum Crown lift 2m and shape</p> <p>22 Cherry Crown reduce 20%, crown thin 10%, crown lift 3m shape</p> <p>23 Cherry Crown reduce 20%,</p>	No objections	Tue 01 Nov 2005	No	

			crown thin 10%, crown lift 3m shape				
Wed 01 Jun 2005	05/04338/LBC	Listed Building Consent Application	Internal alterations and installation of boiler flues to Flat 1 (basement level), Flat 62 (fourth floor level) and Flat 79 (second floor level).	Application Permitted	Fri 28 Oct 2005	Yes	
Tue 08 Feb 2005	05/00974/LBC	Listed Building Consent Application	Internal alterations to Flats 16, 19, 28, 69, 91 and 94.	Application Permitted	Wed 16 Mar 2005	Yes	
Mon 21 Jul 2003	03/05663/LBC	Listed Building Consent Application	Internal alterations to Flats 23, 27, 35, 47, 89, 96 and 103.	Application Permitted	Fri 26 Sep 2003	Yes	
15 September 1998	98/07709/LBC	Listed Building Consent Application	Alterations during course of construction to scheme dated 6.6.96 for replacement windows and decorative ironwork and associated repairs: internal works, renewal of roof slates and rafters.	Application permitted	28 November 1998	Yes	
Wed 17 Jan 1996	96/00485/LBC	Listed Building Consent Application	Flats coleshill buildings 20-30a pimlico road lond - rebuilding cracked spalling & leaning brickwork & other works of refurbishment	Application Permitted	Fri 28 Jun 1996	Yes	

Wed 17 Jan 1996	96/00484/FULL	Application for full Planning Permission	Flats coleshill buildings 20-30a pimlico road lond - rebuilding cracked spalling & leaning brickwork to external elevations & other works of refurbishment	Application Permitted	Thu 06 Jun 1996	Yes	
Mon 17 Jul 1995	95/04907/LBC	Listed Building Consent Application	Flats coleshill buildings 20-30a pimlico road lond - internal alterations to 6 flats and alterations to windows at rear	Application Permitted	Wed 13 Sep 1995	Yes	
Mon 17 Jul 1995	95/04906/FULL	Application for full Planning Permission	Flats coleshill buildings 20-30a pimlico road lond - internal and external alterations to 6 flats involving the bricking up of existing windows at rear	Application Permitted	Wed 13 Sep 1995	No	
Wed 12 Apr 1995	95/02819/ADLBC	Approval of Details (ADLBC)	Flats coleshill buildings 20-30a pimlico road lond - approval of details pursuant to listed bldg consent dated 21/2/95:drawings of arrangement of entrance gate,side panels,fanlights,gate midrail	Application Permitted	Tue 06 Jun 1995	Yes	
1995	95/01887/ADLBC	Approval of Details (ADLBC)	Flats coleshill buildings 20-30a pimlico road lond - approval of details pursuant to listed bldg consent dated 12/10/94:drawings of new entrance screen to 5 grd level entrances to coleshill flats	Application Permitted	Tue 28 Mar 1995	Yes	

Thu 05 Jan 1995	94/08577/LBC	Listed Building Consent Application	Flats coleshill buildings 20-30a pimlico road lond - repairs to defective brickwork and external elevations including windows and roof covering.	Application Permitted	Tue 21 Feb 1995	Yes	
Fri 19 Aug 1994	94/05832/LBC	Listed Building Consent Application	Flats coleshill buildings 20-30a pimlico road lond - four new entrance gates/screens & renewal of flat entrance doors to higher security doors	Application Permitted	Wed 12 Oct 1994	Yes	
Fri 19 Aug 1994	94/05831/FULL	Application for full Planning Permission	Flats coleshill buildings 20-30a pimlico road lond - 4 no entrance gates/screens to match gate adjacent to 225 ebury st & security doors; 5-22 & 27-44 coleshill flats and 49-66, 71-88 & 93-110 coleshill flats	Application Permitted	Wed 12 Oct 1994	Yes	Ground Floor 20 Pimlico Road London SW1W 8LJ
Mon 28 Oct 1991	91/03182/LBC	Listed Building Consent Application	Flats coleshill buildings 20-30a pimlico road lond - alterations to enhance security of common flat entrances on ground floor & extending existing shopfronts to nos.20,24 & 28	Application Refused	Mon 23 Dec 1991	Yes	Ground Floor 20 Pimlico Road London SW1W 8LJ
Mon 28 Oct 1991	91/03181/FULL	Application for full Planning Permission	Flats coleshill buildings 20-30a pimlico road lond - alterations of existing common entrances to	Application Refused	Mon 23 Dec 1991	Yes	

			enhance securityextension of existing shop units nos.20,24 & 28				
3 December 1984	TP/4862	Application for full planning permission	Use of existing workshop/store as estate office and store	Application permitted	31 January 1995	Yes	
2 July 1990	TP.4862	Application for full planning permission	The erection of an extension to each of the top floor flats at Nos. 22,44, 66, 109,110 Coleshill Buildings, Pimlico Road, S.W.1.	Application permitted	8 October 1970	Yes	

Orange Square

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
27 July 2018	18/06344/FULL	FULL	Use of the open space between Ebury Street and Pimlico Road as weekly Saturday farmers' market with servicing hours from 7.30am-3pm and trading hours from 9am-2.05pm	Granted	1 November 2018	Yes	Personal permission to London Farmers' Markets Ltd

Fountain, Avery Farm Row

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
18 Dec 2017	17/111/42/COLBC	LBC	<i>"Repairs to the substructure of the fountain (Marquess of Westminster Memorial Fountain) and surrounding paving stones."</i>	Granted	31 January 2018	Yes	

Ebury Square

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
20 Aug 2013	13/08310/FULL	Full	<i>Works to boundaries of Ebury Square Gardens comprising installation of new wrought iron gate on western boundary and replacement and widening of two existing gates on eastern and western boundaries.</i>	Granted	14 October 2013	Yes	
6 June 2014	14/00536/FULL	Full	<i>Installation of a new lighting scheme to Ebury Square Gardens.</i>	Granted	30 July 2014	Yes	

Appendix C

Drawings submitted for formal approval

Drawing Title	Drawing Reference
Location Plan	288_P10.001
Site Boundary	288_P10.002
Demolition Site Plan	288_P10.039
Colehill Flats Basement Plan Demolition	288_P10.040
Demolition Ebury Street Colehill Flats Elevations 19-20	288_P10.041
Demolition Ebury Street Colehill Flats Elevations 21-27	288_P10.042
Demolition Pimlico Road Colehill Flats Elevations 3	288_P10.043
Demolition Pimlico Road Colehill Flats Elevations 4	288_P10.044
Demolition Pimlico Road Colehill Elevations 5-6	288_P10.045
Demolition Pimlico Road Colehill Flats Elevations 7-17	288_P10.046
Demolition Colehill Flats Typical Unit	288_P10.047
Proposed Colehill Flats Basement Plan	288_P10.050
Proposed Ebury Street Colehill Flats Elevations 19-20	288_P10.051
Proposed Ebury Street Colehill Flats Elevations 21-27	288_P10.052
Proposed Pimlico Road Colehill Flats Elevation 3	288_P10.053
Proposed Pimlico Road Colehill Flats Elevation 4	288_P10.054
Proposed Pimlico Road Colehill Flats Elevations 5-6	288_P10.055
Proposed Pimlico Road Colehill Flats Elevations 7-17	288_P10.056
Proposed Colehill Flats Typical Unit	288_P10.057
Proposed Site Plan	288_P20.003
CIL Phase 1 – Demolition	288_P20.004
CIL Phase 2 – Construction	288_P20.005
CIL Phase 3 – Demolition	288_P20.006
CIL Phase 4 – Construction	288_P20.007
Proposed Sub-Basement Plan	288_P20.098
Proposed Basement Plan	288_P20.099
Proposed Ground Floor Plan	288_P20.100
Proposed First Floor Plan	288_P20.101
Proposed Second Floor Plan	288_P20.102
Proposed Third Floor Plan	288_P20.103
Proposed Fourth Floor Plan	288_P20.104
Proposed Fifth Floor Plan	288_P20.105
Proposed Sixth Floor Plan	288_P20.106
Proposed Seventh Floor Plan	288_P20.107
Proposed Eighth Floor Plan	288_P20.108
Proposed Ninth Floor Plan	288_P20.109

Proposed Tenth Floor Plan	288_P20.110
Proposed Roof Plan	288_P20.111
Proposed Ebury Street Elevation	288_P30.001
Proposed Cundy Street Elevation	288_P30.002
Proposed Avery Farm Row Elevation	288_P30.003
Proposed Pimlico Road Elevation	288_P30.004
Proposed Elizabeth Place Elevation	288_P30.005
Proposed Five Fields Row Elevation	288_P30.006
Proposed Building A Internal Courtyard Elevations	288_P30.007
Proposed Building B Podium Elevations	288.P30.008
Proposed Building C Elevations	288_P30.009
Proposed Elizabeth Place Gardens Gates Elevations	288_P30.010
Proposed Site Section AA	288_P40.001
Proposed Site Section BB	288_P40.002
Proposed Site Section CC	288_P40.003
Proposed Building B Section	288_P40.004
Proposed Building C Section	288_P40.005

Appendix D

Drawings not submitted for formal approval

Drawing Title	Drawing Reference
Existing Plans	
Existing Site Plan	288_P10.003
Existing Basement Plan	288_P10.011
Existing Ground Floor Plan	288_P10.012
Existing Typical Floor Plan	288_P10.013
Existing Roof Plan	288_P10.014
Existing Ebury Street Elevation	288_P10.021
Existing Cundy Street Elevation	288_P10.022
Existing Avery Farm Row Elevation	288_P10.023
Existing Pimlico Road Elevation	288_P10.024
Landscaping Plans	
GF Masterplan	CSQ-L-TLG450-MP-0001
Sheet Arrangement GF	CSQ-L-TLG450-MP-0002
Roof Plan	CSQ-L-TLG450-MP-0003
Enlarged General Arrangement Plan Lower GF	CSQ-L-TLG450-PL-B001
Enlarged General Arrangement Plan GF 1/11	CSQ-L-TLG450-PL-0001
Enlarged General Arrangement Plan GF 2/11	CSQ-L-TLG450-PL-0002
Enlarged General Arrangement Plan GF 3/11	CSQ-L-TLG450-PL-0003
Enlarged General Arrangement Plan GF 4/11	CSQ-L-TLG450-PL-0004
Enlarged General Arrangement Plan GF 5/11	CSQ-L-TLG450-PL-0005
Enlarged General Arrangement Plan GF 6/11	CSQ-L-TLG450-PL-0006
Enlarged General Arrangement Plan GF 7/11	CSQ-L-TLG450-PL-0007
Enlarged General Arrangement Plan GF 8/11	CSQ-L-TLG450-PL-0008
Enlarged General Arrangement Plan GF 9/11	CSQ-L-TLG450-PL-0009
Enlarged General Arrangement Plan GF 10/11	CSQ-L-TLG450-PL-0010
Enlarged General Arrangement Plan 1FL 1/4	CSQ-L-TLG450-PL-0101
Enlarged General Arrangement Plan 1FL 2/4	CSQ-L-TLG450-PL-0102
Enlarged General Arrangement Plan 1FL 3/4	CSQ-L-TLG450-PL-0103
Enlarged General Arrangement Plan 1FL 4/4	CSQ-L-TLG450-PL-0104
Enlarged General Arrangement Plan 2FL	CSQ-L-TLG450-PL-0201
Enlarged General Arrangement Plan 4FL	CSQ-L-TLG450-PL-0401
Enlarged General Arrangement Plan 5FL	CSQ-L-TLG450-PL-0501
Enlarged General Arrangement Plan 6FL	CSQ-L-TLG450-PL-0601
Enlarged General Arrangement Plan 7FL	CSQ-L-TLG450-PL-0701
Enlarged General Arrangement Plan 8FL 1/2	CSQ-L-TLG450-PL-0801
Enlarged General Arrangement Plan 8FL 2/2	CSQ-L-TLG450-PL-0802

Enlarged General Arrangement Plan 9FL	CSQ-L-TLG450-PL-0901
Enlarged General Arrangement Plan 10FL	CSQ-L-TLG450-PL-1001
Site Sections 1/6	CSQ-L-TLG450-SS-101
Site Sections 2/6	CSQ-L-TLG450-SS-102
Site Sections 3/6	CSQ-L-TLG450-SS-103
Site Sections 4/6	CSQ-L-TLG450-SS-104
Site Sections 5/6	CSQ-L-TLG450-SS-105
Site Sections 6/6	CSQ-L-TLG450-SS-106
Details: GF and Public Realm	CSQ-L-TLG450-DT-100
Details: Podiums and Roof Terraces	CSQ-L-TLG450-DT-101
Transport Plans	
Block A – Senior Cundy Street Drop Off General Arrangement	M000483-2-2-DR-013 A
Block A – Senior Cundy Street Drop-off Swept Path Analysis Large Car Access	M000483-2-2-DR-014 A
Block A – Senior Vehicle Lift Swept Path Analysis Large Car Access and Egress	M000483-2-2-DR-015 A
Block A – Senior Cundy Street Loading Area Swept Path Analysis Box Van Access and Egress	M000483-2-2-DR-016 A
Block A – Senior Basement Swept Path Analysis Large Car	M000483-2-2-DR-018 A
Ebury Square Block B – Private Drop-off Large Car Access and Egress Swept Path Analysis	M000483-2-2-DR-004 A
Block B – Loading Bay and Lift Swept Path Analysis Access and Egress Large Car and Box Van	M000483-2-2-DR-006 A
Block B – Private Basement Swept Path Analysis Large Car	M000483-2-2-DR-008 B
Ebury Street Proposed Loading Pad Refuse Vehicle Swept Path Analysis	M000483-2-2-DR-020 A
Pimlico Road Proposed Kerb Alignment & Proposed Bus Stop Relocation	M000483-2-2-DR-003 C
Avery Farm Row and Ebury Square Proposed Raised Table	M000483-2-2-DR-010 A
Orange Square Preliminary Access Layout Swept Path Analysis Box Van	M000483-2-2-DR-023 A
Pimlico Road Existing Bus Stop Locations	M000483-2-1-DR-054 A

Appendix E

Accommodation Schedules

Appendix E

Affordable Housing by habitable room, unit and floorspace.

ES Parameter schemes

	Habitable rooms	Units	GIA
Building A (C2)	139	119	13,353
Building A (C3)	47	23	4,992
Market (C3)	220	70	12,732
Intermediate	118	49	4,778
Social Rent	146	44	5,582
Total	670	305	41,437
AH Percentage	39%	30%	25%
AH Percentage (excluding C2)	50%	50%	37%

Table AE.1 – Maximum Assisted Living scheme

	Habitable rooms	Units	GIA
Building A (C2)	0	0	0
Building A (C3)	232	91	18,345
Market (C3)	220	70	12,732

Intermediate	118	49	4,778
Social Rent	146	44	5,582
Total	716	254	41437
AH Percentage	37%	37%	25%

Table AE.2 – Maximum Independent Living scheme

	Habitable rooms	Units	GIA
Building A (C2)	112	100	11,336
Building A (C3)	79	37	7,009
Market (C3)	220	70	12,732
Intermediate	118	49	4,778
Social Rent	146	44	5,582
Total	675	300	41437
AH Percentage	39%	31%	25%
AH Percentage (excluding C2)	47%	47%	34%

Table A3.3 – Design Scheme

Appendix F

Pimlico Road Local Shopping Centre Map



50 metres

Experian Goad Plan Created: 11/05/2020
Created By: Gerald Eve