



GERALDEVE

Westminster City Council
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

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

FAO: Matthew Mason

23 October 2020

Our ref: JCW/GBR/AROB/J8038

Your ref: 20/03307/FULL & 20/03308/LBC

Dear Sir

**Development site bound by Ebury Street, Pimlico Road, Avery Farm Row, Ebury Square and Cundy Street, known as 'Cundy Street Quarter' – Proposed Amendments
Full Planning and Listed Building Consent application references: 20/03307/FULL & 20/03308/LBC**

We write on behalf of our client, Grosvenor Estate Belgravia (hereafter referred to as 'the Applicant'), to provide updated application documentation to respond to comments provided by statutory and non-statutory consultees on the pending full planning and listed building consent applications seeking the proposed development of the Cundy Street Quarter (ref: 20/03307/FULL and 20/03308/LBC).

This letter and substitution documentation are separate and in addition to the response to queries which we issued to Westminster City Council (WCC) on 12 October 2020.

As set out within the original application documents, these development proposals seek to significantly benefit a much broader part of the Belgravia and Westminster community. The plans would almost double the number of affordable homes on the site including new social rent homes for Walden House residents with the option to move just once into their accommodation. Alongside much needed new housing the proposals would provide new amenities for local people, the creation of up to 260 permanent jobs, investment in new and existing public spaces and buildings which produce 90% less carbon emissions when they are being used.

Introduction

Subsequent to the submission of the applications, the Applicant has continued to undertake local consultation, both with residents and businesses within the community, Ward Councillors and City Council officers, and has reviewed comments made by interested parties as well as statutory consultees via the planning section of Westminster City Council's website.

In response to these comments, the Applicant has decided to make several minor changes to the design proposals. This letter provides a summary of the minor changes and lists the application documents which are requested to be substituted. These new documents should all be read alongside the reports which formed part of the original application.

A summary of the scheme changes, which are proposed as part of this substitution, is as follows:

- Changes are proposed to the design of Ebury Square Gardens. These include retaining the configuration of the Gardens with the fountain in the middle and the existing path structure. More diverse play space for a range of ages will be dispersed around the Gardens in amongst improved planting. 560 sqm of new children's play space would be provided, a loss of 56 sqm when compared to the original submission;
- Minor amendments within the proposed cycle rooms at the basement levels of Buildings A, B and C to ensure compliance with London Plan requirements in terms of the total number of spaces and racks provided for oversized bikes. 393 long-stay spaces are now proposed, an increase of 26 when compared to the original application;
- Confirmation that within Building C a secure cycle room providing 32 spaces for residents of the Colehill Flats will be provided (the number and configuration of spaces within this room was not shown as part of the original application);
- Relocation of 12 short stay cycle racks from the north of Ebury Square to the south of Ebury Square and Avery Farm Row;
- Minor public realm changes at Avery Farm Row;
- Minor changes to the basement waste room within Building B and the ground floor waste room in Building C to allow the storage of bulky waste, to address comments made by the WCC Waste Officer;
- Improvements to the design of the Cundy Street carriageway to ensure that only three residential parking bays would need to be relocated instead of 10, which follows comments made by the WCC Highways Officer;
- Following comments made by the Metropolitan Police, a raised table is no longer proposed at the south-east corner of Ebury Square;
- Two larger trees (6-9 metres in height rather than 4.5-5.5m) than were originally proposed would be provided along Avery Farm Row.

The proposed minor changes are explained in more detail below, and are structured into the following topics:

- i. Ebury Square Gardens;
- ii. Transport and Waste;
- iii. Trees; and
- iv. Environmental Statement.

The table overleaf sets out the documents which are proposed to be updated as part of this substitution:

Table 1 – Amended documents schedule

| Document | To be substituted | Substitute / Additional document |
|---|--|--|
| Design & Access Statement | n/a | Design & Access Statement Addendum |
| Transport Assessment | n/a | Transport Assessment Addendum |
| Proposed Site Plan | 288_P20.003 | 288_P20.003 Rev A |
| Proposed Basement Plan | 288_P20.099 | 288_P20.099 Rev A |
| Proposed Ground Floor Plan | 288_P20.100 | 288_P20.100 Rev A |
| Landscaping drawings (indicative only and not for approval) | CSQ-L-TLG450-PL-0002; 006; 008; 009; 0010; 0102; 0103. | CSQ-L-TLG450-PL-0002 Rev A; 006 Rev A; 008 Rev A; 009 Rev A; 0010 Rev A; 0102 Rev A; 0103 Rev A. |
| Arboricultural Report | n/a | Response Memo dated 4 August 2020 |
| Environmental Statement: Volumes 1, 2, 3, and 4 | n/a | Letter prepared by Avison Young dated 16 October 2020 |

This substitution does not seek to change the massing or external design as proposed as part of the full planning and listed building consent applications.

i. Ebury Square Gardens

Over a dozen of the earliest comments in response to the application were from residents who considered that the changes within Ebury Square Gardens were unsympathetic and detrimental to the gardens and that the location of the playspace would lead to unacceptable levels of noise close to residential flats.

So that these comments could be fully understood and addressed the Applicant arranged a webinar to discuss the Ebury Square changes with local residents on 4 June 2020. Four further meetings, online and in person, subsequently took place between 10 June and 20 August 2020 to review and agree on the revised design for the Gardens.

As a result, revised concept plans and an updated landscaping addendum have been prepared, which incorporate feedback by Semley House residents, and the comments received so far during the determination period. The revised design has been welcomed by residents.

The revised plans include the retention of the fountain at the centre of the space and diagonal routes across the Gardens which will be refurbished with semi-permeable surfaces to be more attractive and will allow rainwater to drain into the soil below.

The playspace would be more integrated into the wider landscaping design, with zoned areas for informal play. The revised layout would provide four informal activity areas along the west and south of Ebury Square. The design would use natural play elements, such as wood, stones, water, and attractive shrubs and plants to provide interest and opportunities for play. The materials selected would be high quality, durable and low maintenance. These areas would be suitable for the 0-5 and 6-11 age ranges and in total 403 sqm of new playspace would be provided within the square, this is 56 sqm less than was proposed as part of the original application. There would be 189 sqm of space

provided for under 5s play and 214 sqm provided for age 6-11 play. Additionally, the plans will introduce more suitable and varied planting throughout the Gardens to improve biodiversity, offer greater seasonal interest and help tackle anti-social behaviour. A 30 sqm adult activity area would also be provided.

Accordingly, the new drawings as referenced in Appendix B will supersede drawings as submitted, albeit we continue to request that the proposals for hard and soft landscaping, and playspace, are subject to a condition requiring the submission and approval of full details in due course

ii. Transport and Waste

On-street Car Parking

During the determination period discussions have been ongoing with the City Council regarding the relocation of resident permit holder bays from Cundy Street. In response, an alternative carriageway arrangement is proposed, which would only require the relocation of three resident permit parking bays, rather than ten.

In terms of the existing surface car parking behind the Coleshill Flats, a site visit was undertaken on 25 September 2020 which confirmed that there are 24 spaces available for car parking and two bays utilised for cycle parking storage. Further information has been provided by the Applicant and Peabody Facilities Management about how the bays are utilised, as follows:

- Four residential parking bays (including one disabled parking bay);
- Two spaces used by the Applicant;
- 16 empty/unused parking bays;
- Two visitor parking bays.

On this basis, it is proposed that the four residential parking spaces are accommodated by the available on-street residents and shared use bays within 200m of the site. Within the accompanying Transport Assessment Addendum, Momentum note that relocating the four spaces would result in an occupancy rate of 78.6%, which is an increase of 1.2%. As this would remain below the 80% stress threshold, it is therefore not considered that this would cause unacceptable parking stress.

It is not proposed to re-provide the other car parking spaces, given that these are not utilised.

Off-street Car Parking

During consultation the WCC Highways Officer has noted that the proposals do not provide the number of off-street residential car parking spaces which would meet WCC's Unitary Development Plan (UDP) requirements, which would require 152 off-street car parking spaces, The UDP is now 13 years old and the direction of travel in relation to car parking policy has changed markedly during this time. In contrast, the emerging Draft New London Plan and Draft Westminster City Plan 2019-2040 propose that developments in areas of high accessibility are car free.

The Applicant's approach has been to provide a relatively low level of residential car parking which sits within the range of the current and emerging policy requirements to promote sustainable travel

whilst ensuring that any demand from new residents for on-street car parking permits would not lead to an unacceptable level of parking stress.

The Site is highly accessible with excellent transport links and a PTAL rating of 6B. The proposals seek to provide 35 off-street residential car parking spaces, which is circa 25% of the UDP requirements. It is considered that this is a balanced, pragmatic solution given the conflicting policy positions.

Momentum has calculated that there would be a demand for 55 residential car parking spaces from the proposed development, 20 more than is proposed. However, to mitigate the potential increase in demand for on-street car parking, all residents of the proposed development would be provided with car-club membership for 25 years – something which could be secured within a Section 106 agreement. In addition to this, two-car club bays would be provided in the vicinity of the development.

Due to the constraints of the site, in particular the inability to provide a deeper basement given that the site is located within a Crossrail 2 safeguarding zone and the need to provide the most efficient used of land at grade there is not an opportunity to feasibly provide more off-street car parking.

The proposed quantum of off-street car parking remains unchanged and we consider the level of the provision sensible in terms of the central location of the site, the need to design in sustainable travel, whilst balanced against the current policy requirement and local parking stress levels.

Long Stay Cycle Parking

The proposed provision of long stay cycle parking spaces has been updated in line with TFLs calculations in respect of the flexible ground floor uses, and now reflect an additional 26 long stay cycle parking spaces as shown in the updated basement and ground floor plan drawings.

The Coleshill Flats currently have access to two container units in the rear car park which are in part used to store bikes. To confirm, a dedicated room with 32 cycle parking spaces on the ground floor of Building C for the dedicated use of Coleshill residents is proposed. Although this commitment was made as part of the original application the number of spaces which would fit in this room and the layout of the racks was not previously provided. This is considered to be a planning benefit.

Short Stay Cycle Parking

Following discussions with local residents and the City Council highway officers, it is proposed to relocate the 12 short stay cycle spaces on the north side of Ebury Square Gardens on Semley Place, closer to the main part of the development on Avery Farm Row.

Storage of waste

There have been comments received from the Waste Officer following the submission of the application. The consultant team have reviewed the comments in detail and propose several amendments to address the queries raised.

The basement floorplan (ref. P20.099 Rev A) and the ground floorplan (ref. P20.100 Rev A) have been updated to show the different bins within the proposed storage areas. The bins have been allocated for general waste, recycling, food waste, cooking oil and clinical waste.

Bulky waste storage areas would also now be provided in Building A and Building B and adjacent to the Coleshill residential storage area.

iii. Trees

Following our letter dated 12 October 2020, revised landscaping plans show that in response to the comment from the Arboricultural Officer, it is proposed to increase the height of two trees from the 4.5m-5.5m range to the 6-9m range on Avery Farm Row.

For further details, please refer to the Arboricultural Report Addendum. As this sets out, opportunities for planting throughout the site have been fully explored but due to pavement widths, underground services and proximity to buildings no planting in addition to the proposed 139 newly planted trees would be feasible.

However, the Applicant would be willing to enter into a planning obligation to provide a contribution towards tree planting and greening initiatives, such as 'living pillars', within the local area. The planting would be for WCC to undertake but information has been prepared within the Design & Access Statement Addendum showing locations where planting may be feasible.

iv. Environmental Statement

An Environmental Statement (ES) formed part of the original submission. Avison Young has reviewed in detail the changes proposed as part of this substitution and considers that these have no material bearing upon the results and conclusions of all topics covered by the ES. As such the document as submitted remains fully applicable and valid.

Summary

It is sought to make minor changes to the Cundy Street Quarter proposals in relation to highways & waste, the design of Ebury Square Gardens and tree planting following further consultation with both local residents and the City Council. Accordingly, it is sought to substitute documentation into the application which will allow further consultation to take place. The changes follow the Applicant undertaking further local consultation and reviewing comments made by WCC Officers and other consultees.

Overall, the development proposals will significantly benefit a much broader part of the Belgravia and Westminster community. The plans will almost double the number of affordable homes on the site including new social rent homes for Walden House residents with the option to move just once into their accommodation. Alongside much needed new housing the proposals will provide new amenities for local people, the creation of up to 260 permanent jobs, investment in new and existing public spaces and provide buildings which produce 90% less carbon emissions when they are being used.

We trust that the revised information can be substituted into the applications, formal consultation can take place again and that the applications in their current form can be presented to the planning committee in the near future.

Supporting Information

Alongside this covering letter, the following has been prepared to substitute into the applications:

- Design & Access Statement Addendum (including landscaping), prepared by DSDHA and Todd Longstaffe-Gowan;
- Transport Assessment Addendum, prepared by Momentum;
- Arboricultural Assessment Addendum, prepared by TMA;
- Substitute architectural drawings, prepared by DSDHA;
- Substitute landscape drawings (not for formal approval), prepared by Todd Longstaffe-Gowan; and
- ES Statement of Conformity letter, prepared by Avison Young.

Further to this, the revised drawing schedules are contained in Appendix A and B of this letter.

If you require any further information or clarification in respect of these details, please do not hesitate to contact James Wickham or Gary Brook of this office.

Yours faithfully



Gerald Eve LLP

jwickham@geraldeve.com

Direct tel. +44 (0)20 7333 6353

Encs. As above

Appendix A – Substitute Architectural Drawing Schedule

| Drawing Title | Drawing Reference as submitted | Drawing Revision for Substitution |
|----------------------------|--------------------------------|-----------------------------------|
| Proposed Site Plan | 288_P20.003 | 288_P20.003 Rev A |
| Proposed Basement Plan | 288_P20.099 | 288_P20.099 Rev A |
| Proposed Ground Floor Plan | 288_P20.100 | 288_P20.100 Rev A |

Appendix B - Landscape Drawings Schedule (not for formal approval)

| Drawing Title | Drawing Reference as Submitted | Drawing Revision for Substitution |
|--|---------------------------------------|--|
| Enlarged General Arrangement Plan GF 2/11 | CSQ-L-TLG450-PL-0002 | CSQ-L-TLG450-PL-0002 Rev A |
| Enlarged General Arrangement Plan GF 6/11 | CSQ-L-TLG450-PL-0006 | CSQ-L-TLG450-PL-0006 Rev A |
| Enlarged General Arrangement Plan GF 8/11 | CSQ-L-TLG450-PL-0008 | CSQ-L-TLG450-PL-0008 Rev A |
| Enlarged General Arrangement Plan GF 9/11 | CSQ-L-TLG450-PL-0009 | CSQ-L-TLG450-PL-0009 Rev A |
| Enlarged General Arrangement Plan GF 10/11 | CSQ-L-TLG450-PL-0010 | CSQ-L-TLG450-PL-0010 Rev A |
| Enlarged General Arrangement Plan 1FL 2/4 | CSQ-L-TLG450-PL-0102 | CSQ-L-TLG450-PL-0102 Rev A |
| Enlarged General Arrangement Plan 1FL 3/4 | CSQ-L-TLG450-PL-0103 | CSQ-L-TLG450-PL-0103 Rev A |