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Project title	Ebury Bridge Renewal	Job number
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		02 October 2020
Subject	WCC City Plan Examination - Ebury Bridge Renewal Background	

1 Introduction

Following the ongoing hearing sessions pursuant to the emerging Westminster City Plan ('WCP'), the Inspector has requested a written note on the background to the recently submitted Ebury Bridge Hybrid Outline Application. Accordingly, this note sets out the following:

- Background to the estate;
- Pre-submission consultation process;
- Summary of the Application Proposal
- Key policy compliances;
- Determination progress to date; and
- Development program post determination.

2 Estate Background

The Ebury Bridge Estate is located in the south west corner of the City of Westminster. It is bounded to the west by Ebury Bridge Road, to the north by Ebury Bridge, to the south by the recently constructed Grosvenor Waterside development and to the east by the railway line that connects to Victoria Station. The original estate, constructed in the early 1930's, consisted of nine blocks; a further three were constructed in the late 1930's; Edgson House in the 1950's and Wainwright House in the 1980s – a total of fourteen blocks in all.

Cheylesmore House, one of the original blocks of the early 1930's, is located to the south west corner of the estate. As it is now held under a separate private freehold title, it is no longer part of the development. Accordingly, a total of thirteen blocks are included within the development proposal, which accommodate a total of 336 homes. Of these, 198 homes are socially rented units and the remaining 138 are held under private leaseholds.

There has been an aspiration to regenerate the Ebury Bridge Estate since 2010 when it was first identified in Westminster City Council's ('WCC') Housing Renewal Strategy as one of five key estates within the borough in need of significant investment. The homes within the estate were undersized, lacked private

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amenity space and otherwise required substantial work and maintenance to bring their quality up to a modern standards.

Accordingly, in 2013 WCC agreed to the enhancement of a number of the existing residential blocks along the western side of the estate alongside the demolition and rebuild of blocks along the eastern side. Following extensive consultation and a successful residents' ballot (explored in more detail in the following section), a Full Planning Application was submitted in 2014 (LPA Ref: 14/01295/COFUL) and subsequently approved in 2016. This proposal was found to be unviable however and remained unimplemented, subsequently expiring in 2019.

Accordingly, in June 2017 work began on devising alternative renewal options for the estate. Ongoing consultation with residents led by a team of dedicated on-site engagement officers culminated in the confirmed resident preference for the estate's comprehensive demolition and rebuild rather than further retrofitting or enhancement of existing blocks.

Since the original application, WCC has been undertaking a process of decanting residents from the 13 buildings across the estate with the view that, if it is their preference, they can then be rehoused in new homes across the estate when they are constructed. Edgson House was one of the first buildings to benefit from vacant possession hence it was demolished with approval secured in September 2019 for the creation of a "meanwhile" community hub, café and workspace / retail units in its place. This facility will remain in situ throughout the estate's regeneration and, at the time of writing, was almost complete and close to occupation.

3 Pre-submission Consultation Process

As noted above, in 2013 a renewal scheme was developed for the estate that included the demolition of 172 flats in the eight existing buildings along the eastern edge - and their replacement with four new blocks containing 271 new homes (an uplift of 99 units). The 164 flats in the 5 blocks to be retained would be refurbished. This proposal was developed through extensive consultation with estate residents and, following a successful resident ballot, culminated in the submission of a Full Planning Application. Following consent of this Application on 7th March 2016 however, it was not possible to make the development attractive to developers.

Accordingly, on 28th June 2017 WCC held a public meeting where the Council's Cabinet Members and Senior Officers re-emphasised their commitment to the renewal of the Ebury Bridge Estate, with assurances given to residents that an alternative renewal solution would be identified. It was outlined here that this process would be resident led, with the Council establishing a clear set of consultation aims which included but were not limited to:

- Maximising participation in consultation ahead of submission of a planning application, engendering support for the renewal from stakeholders, residents, businesses, neighbours, amenity groups and elected members;
- Ensuring all involved had a full understanding of the renewal process and what any developments meant for them;
- Ensuring the design evolution is presented to residents and the community in an easily accessible and digestible format, containing jargon-free content;
- The provision of independent support and advice around the renewal process through an Independent tenant and Leasehold Advisor.
- Offering a variety of different engagement methods to enable maximum outreach across the community.

With regards to the final point, before commencing formal dialogue, residents' preferred methods of communication were established. This included the regular distribution of hard and digital communications;

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newsletters; an on-site engagement team and dedicated consultation space holding 1-1 meetings with residents; the regular meetings, exhibitions and workshops with local amenity groups, residents, businesses and specific tenure groups; and tailored sessions targeted at harder to reach groups such as younger or older residents and those for whom English is not their first language. Additionally, the Community Futures Group ('CFG') was established which is a body representing the Ebury Estate residents, secure tenants, and on-site businesses. It is supported and recognised by the Council.

Within the above context, between July 2017 and February 2020 a structured period of engagement was carried out across the following key stages:

- **Vision and Objectives (July – October 2017):** As the first stage in the process, surveys were conducted via door knocking, a website and fortnightly newsletters. This process sought to understand the initial thoughts of estate residents. During this period over 130 conversations were conducted, with the information gathered supporting the agreement of a set of “key pledges” that included a right to return for all secure tenants and resident leaseholders; the full replacement of council homes; the provision of local retail options; the addressing of estate overcrowding; and that the estate remain Council-owned.
- **Options Appraisal (October 2017 – March 2018):** This period was structured around workshops with leaseholders, secure tenants and temporary accommodation households. Here, a selection of development options were tabled and reviewed with any fundamental aspirations for a future scheme carried forward. Concurrent with this, the CFG held monthly meetings and drop-ins with residents and businesses to continue the dialogue. During this period, key themes were developed such as the need for homes to have storage and be dual aspect; the provision of play and open spaces for all ages; the provision of community facilities; better access to homes; and improved insulation and sound proofing.
- **Narrowing down the Options (March – April 2018):** During this period, eight development scenarios were established which ranged from complete refurbishment; extensions to the original 2016 consent; a mix of demolition and refurbishment; and complete demolition and replacement with approximately 750 new homes; or else 800 new homes. The CFG provided residents and businesses with detailed training on developer-led viability assessments which enabled residents to objectively analyse each scenario using up to date benchmarking figures. This culminated in the selection of Scenario 7 (complete demolition and the creation of approximately 750 homes).
- **Shaping the Preferred Scenario (May – June 2018):** This stage included surveys, pop-up consultation events and door to door questionnaires with a view to refining the scenario concept of complete demolition. The preferred scenario was then presented to the WCC Cabinet in July 2018 who gave it the green light to be worked in further detail.
- **Best Value and Delivery Options (July 2018 – February 2019):** In order to ascertain how best the scheme could be delivered, residents were invited to soft market testing to explore which delivery route would be most appropriate. Alongside the market testing, 6 estate-wide door knocking exercises were carried out (comprising 136 individual conversations); 12 meetings with the CFG held; 9 public drop in events open to neighbours and residents; 5 public exhibitions and more than 250 hits on the development’s website. This allowed the more detailed priorities of the community to be teased out, and included matters such as the need for better ventilation, more street lighting, protection from railway noise, trees and landscaping.
- **Pre-planning Consultations (February 2019 – May 2020):** This stage focused on the design development of the Estate Masterplan, structured around topic-led workshops, drop-in sessions and meetings with residents, stakeholders and neighbours. Topics explored included masterplan principles such as height, block location, sunlight and daylight, and outdoor space; placemaking principles such as transport, play spaces and landscaping; and home design principles such as unit sizes and layouts, ventilation and window types. This process was followed by an Initial Detailed Design Exhibition (open for three weeks)

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in October 2019 which, heavily publicised, was attended by 227 people. From this, 148 surveys were received online and 43 written feedback forms were submitted. Feedback received was generally positive with 77% supporting the proposal. A notable concern raised however was the impact the scheme will have on car parking in surrounding roads; and the impact the taller buildings may have on neighbouring blocks from a townscape and sunlight / daylight aspect.

Pursuant to car parking, a review of the design following this exhibition facilitated on-site measures to allow residents to live a “car-free” lifestyle. This included the provision of 1,500 cycle spaces, Legible London signage to support walking routes, and the provision of car club spaces. With regards to heights, the proposed Block 9 was reconfigured to lessen the impact on neighbouring Cheylesmore Houses, with a similar reduction in height of the shoulders on those blocks adjacent to 1 Ebury Bridge Road and Consort Rise House. These amendments were assessed using daylight analysis software and were shown to reduce harm to these blocks from a sunlight and daylight perspective. Additionally, further step backs of both the lower and upper storeys of those blocks on Ebury Bridge Road were adopted, increasing distances between neighbouring properties, increasing sky visibility from surrounding existing homes and allowing for a wider footway on Ebury Bridge Road.

Following these scheme refinements, a Detailed Design Exhibition was held in March 2020 (set to open for three weeks, though due to the Covid-19 advice closed early and relaunched in April). During this period, 156 online surveys and more than 800 telephone calls were received. Feedback received from both residents and neighbours was overwhelmingly positive, with 71% of respondents rating a 4 or 5 out of 5 for their levels of optimism about the renewal proposal – with 91% saying they might, probably or definitely visit the new public places. As part of this, many comments welcomed the refinements to the building heights and block set backs.

Off the back of this extensive process of consultation and engagement, a Hybrid Outline Planning Application for the estate’s renewal was submitted to the WCC Local Planning Authority (‘LPA;’) on July 10th 2020. It should be noted that, in the lead up to submission a further resident ballot was not carried out. The Mayor’s Good Practise Guide to Estate Regeneration (2018) encourages ballots to ensure that estate residents get a fair deal and that emerging regeneration proposals are transparent. GLA funding will be withheld if no ballot takes place, or else if a ballot result is unsuccessful.

Notwithstanding GLA funding not being considered a requirement to ensure the optimum delivery of affordable housing, the Council does not wish to undertake such a ballot now as it believes one-off votes on regeneration projects are, by their nature, a snapshot in time – and no substitute for comprehensive opinion recording over a sustained period. Additionally and from a logistical perspective, submitting the Hybrid Outline Application in a timely manner is essential to facilitate the momentum of the ongoing resident decant. Balloting now would result in undue delays to application’s determination, alongside potentially frustrating residents who are widely keen for the estate’s renewal to commence; having already engaged in one such successful ballot in 2014 and, since, a comprehensive, ongoing and robust consultation process.

4 Summary of Application Proposal

The Hybrid Outline Application for the renewal of the Ebury Bridge Estate is for:

- A mixed use development in outline for residential floorspace and ancillary residential facilities (Class C3) non-residential floorspace comprising flexible retail (Classes A1 – A4), community (Class D1), leisure (Class D2) and workspace (Class B1) floorspace; provision of basement; new pedestrian and vehicular access; and associated amenity space, open space, plant, landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works; and

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- Detailed planning consent for Blocks 7 and 8 comprising residential floorspace and ancillary residential facilities (Class C3); provision of a basement; new pedestrian and vehicular access; and associated amenity space landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works.

As part of this proposal the Outline Area development quantum would comprise up to 36,610sqm residential floorspace (equating to an illustrative 532 residential units) set around three public squares. It is being submitted with all matters reserved. This approach was been adopted to establish the principle and character of the wider site's redevelopment – whilst allowing the necessary flexibility for blocks to be designed and constructed in the future with due consideration to changing context.

Within the Detailed Area (also known as Phase 1), 226 residential units are proposed across Blocks 7 and 8 which comprise two buildings up to 18 storeys and 17 storeys in height respectively with a basement; and set around a fourth public square. As a detailed consent, construction of these two blocks can start on Site expediently, ensuring the decant and rehousing of existing residents can occur with minimal upheaval.

In all, the residential component will comprise an indicative 758 homes across 9 blocks, which will comprise the replacement of the 336 homes currently on site alongside an uplift of 422. Being delivered as a mix of sizes of which more than 50% will be affordable, this will not only allow all existing residents the opportunity to stay on the Site, but it will also facilitate a substantial uplift of affordable housing overall.

Additionally, up to 3,018sqm of non-residential floorspace (which includes workspace, office and retail) is proposed along key frontages. As part of this, an uplift in community space, both in terms of quantum and quality is also proposed. The Hybrid Outline Application will therefore secure the following benefits:

- Creation of a vibrant, modern neighbourhood for both the existing and new residents;
- Delivery of more homes, of which at least 50% will be affordable, allowing the replacement of all existing affordable homes with uplift so residents can to stay on site. A tenure blind approach will facilitate a genuinely mixed and balanced community;
- Spacious, well insulated new homes of which, more than 90% are to be dual aspect. They will include opportunities for both natural ventilation and active cooling to ensure the residents are both acoustically and thermally comfortable throughout the year. The provision of affordable renewable energy sources and highly efficient homes will alleviate fuel poverty.
- A net increase in playspace across the entirety of the Site, both in quality and quantum terms, alongside the reprovision of a flexible and higher quality MUGA that is open and more inclusive for use;
- Delivery of high quality and well-lit public open spaces that comprise public squares, access routes and gateway. This will support enhanced and legible connections to the wider street network via a new north – south link through the development. Across the public realm there will be a comprehensive shrub and tree planting strategy that will see a biodiversity and ecological net gain;
- Net increase in workspace and retail facilities to provide services to existing and new residents whilst also supporting the Ebury Local Centre;
- Incorporation of sustainable urban drainage systems such as blue roofs, rainwater harvesting and rain gardens;
- Net increase in provision of community facilities across the Site, both in quality and quantum terms. This will include the provision of a larger, modern community hall to replace that in Edgson House.

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5 Key Policy Compliances

The fundamental principle of redeveloping the Ebury Bridge Estate is supported by both current and emerging planning policy.

The National Planning Policy Framework 2019 (paragraph 93) highlights the “social, economic and environmental benefits” that such an estate regeneration proposal can deliver. Building on from this, Policy H8 in the Draft London Plan (Intend to Publish) 2019 raises the opportunities that the redevelopment of existing housing estate can deliver, noting three aims:

- Maintaining good quality, safe homes;
- Delivering additional housing in a sustainable way; and
- Improving the social, economic and physical environment in which these homes are located.

Concurrent with Draft Policy H8, the Mayor’s Good Practice Guide to Estate Regeneration similarly notes that estate regeneration schemes can cite such benefits as a range of better quality housing of all tenures; improvements across neighbourhoods; and new community facilities. It notes however that there is no “one size fits all” approach to estate renewals. In this respect, prior to demolition alternative development scenarios should be considered to assess if there are any more appropriate and cost-effective methods of estate enhancement that can still achieve the same objectives. These alternatives should be explored in close consultation with existing residents and businesses to ensure they are at the heart of the decision making.

The importance of redeveloping the Ebury Bridge Estate is reinforced further through its mention in the Draft Westminster City Plan 2019. Draft Westminster City Plan Policy 1 states that housing growth will be delivered, in part, through the Ebury Bridge Estate Housing Renewal Area designation. Additionally, Draft Westminster City Plan Policy 6 notes the following priorities for the Ebury Bridge Estate:

- Approximately 750 new high quality homes (uplift from the 336 units that currently exist on the Site);
- Enhanced connections to the wider area through improved public realm and green infrastructure;
- Innovative and high-quality design to ensure the most efficient use of land;
- Improvements to the Ebury Bridge Local Centre in the form of new retail and community uses.

The policy’s supporting text highlights that the estate has been a strategic opportunity within the borough since 2010 (having been included in Westminster’s Housing Renewal Strategy 2010) as a result of its current issues – which includes an ageing housing stock, overcrowding and a poor quality public realm. As one of the borough’s oldest housing estates, it is difficult to meet modern accessibility and sustainability standards.

Extensive retrofitting would not be cost effective as it would not allow a substantial uplift in accommodation. Neither would it facilitate wider enhancements to community facilities, open spaces and living quality. The draft policy concludes outlining that a wider phased redevelopment of the estate (as is being proposed with the Hybrid Outline Application) can target these issues.

6 Determination Progress

As set out above, the Hybrid Outline Application for the renewal of the Ebury Bridge Estate was submitted to WCC LPA on July 10th 2020 and made valid from this day – assigned an LPA Reference of 20/04366/COOUT. As an application which required the compilation and submission of an Environmental Impact Assessment, it has a 16 week determination period.

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At the time of writing the application is making positive progress through determination. Formal comments have so far been received from the below consultees, and are currently being reviewed by the design team with responses being compiled accordingly.

- The Environment Agency;
- The Metropolitan Police (Designing Out Crime Officer);
- WCC Waste Officer;
- WCC Tree Officer;
- WCC Environmental Health Officer.

With regards to feedback from the local community, the dedicated on-site engagement officers are still located on-site liaising with residents and neighbours by way of newsletters and website updates to keep them up to date of the proposal. Channels are also open for residents and neighbours to make direct contact with the team (either face to face or via telephone) to ask questions and seek clarifications. At the time of writing, 25 comments had been posted formally on WCC's online planning portal which includes 22 objections, 2 neutral comments and 1 note of support. The note of support was from the Westminster Society. Conversations with other surrounding Residents' Associations are ongoing to gauge their levels of support.

With regards to objections received by members of the community, the LPA Case Officer is reviewing to assess their levels of weight / relevance and will revert back to the design team if further clarification is felt required.

The GLA issued their Stage 1 Letter to the LPA in mid-September 2020. Whilst it notes that there changes or clarifications to the proposal that are required to bring it in line with Draft London Plan Policy, fundamentally the principle of the comprehensive redevelopment of the estate and its affordable housing is supported. With regards to the consultation process, whilst the GLA continued to encourage a resident ballot they did not stipulate it as a requirement given that the consultation as a whole "accords with the key principle of full and transparent consultation and meaningful ongoing involvement".

Additionally, the increase in heights proposed are similarly supported insofar as they are sensitively articulated to respond to the surrounding site context; enable wayfinding; and provide architectural interest; whilst also making a significant contribution to local regeneration. The high quality landscaping, wider permeability and high quality of the new homes is also welcomed as a sought after improvement to the current estate. Where the Stage 1 Letter does call for changes or clarifications, these are being reviewed by the design team with a formal response to be issued in October.

Following our response to all stakeholder and community comments, we will enter into discussions with the LPA Case Officer and WCC's legal team to start drafting the more detailed planning conditions and Heads of Terms for the required Unilateral Undertaking. This is with a view to the Hybrid Outline Application receiving a Resolution to Grant at WCC's Planning Committee in December 2020 – and subsequent to this, the Mayor issuing his Stage 2 Letter, the Unilateral Undertaking being signed and a Decision Notice being issued January / February 2021.

7 Post Determination Program

Following determination of the Hybrid Outline Application and the 6 week Judicial Review period, the requisite pre-commencement planning conditions pursuant to Phase 1 will be submitted. Following their discharge, construction of Phase 1 could start rapidly as, by this time, the original estate blocks in its footprint would have already been demolished with below ground obstacles removed in accordance with the October 2019 approval of the Application for Prior Approval for Demolition (LPA Ref: 19/06951/APAD).

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The residents within these original blocks have been temporarily relocated off-site pending their move into new homes across the development.

In terms of funding, WCC are contributing £105 million in regeneration funding to the scheme in order to support its delivery. Additionally, they have access to further sufficient funds to resolve any anticipated financial deficits of future phases identified in the viability process. The proposal is therefore considered deliverable.

Bouygues UK have been fully mobilised as the contractor for the construction of Phase 1. The agreed upon program they are working to notes the commencement of early works for the phase in March 2021 which will include installing perimeter fencing, carrying out final ground clearance and preparing the compound for construction. The agreed construction program will then commence formally in July 2021, whereby Blocks 7, 8 and the public square they bound will be constructed in tandem. Block 7 is then anticipated for completion and occupation in November 2023 with Block 8 following soon after in December 2023.

Concurrent with discharging the pre-commencement planning conditions pursuant to Phase 1, the detailed design stage for the forthcoming Reserved Matters Applications pursuant to the Outline Area (Phase 2) will commence. The final program for this stage is still high level, agreed by WCC Cabinet but with no contractor yet formally appointed. Notwithstanding, the intention will be to continue working in close consultation with the local community and residents to devise the final detailed design, first for Blocks 1, 5 and 6 in the Masterplan (Phase 2a) and then for Blocks 2, 3, 4, 9 and 10 (Phase 2B).

Subsequent Reserved Matters Applications for these blocks will then be submitted as required in order to ensure that demolition of the existing estate blocks and the subsequent construction of:

- Phase 2A can continue over a period from January 2022 to late 2025; and
- Phase 2B can continue over a period from September 2023 to late 2028.

DOCUMENT CHECKING (not mandatory for File Note)

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