

GREATER LONDON AUTHORITY

Good Growth

Amanda Jackson
Development Planning
City of Westminster
PO Box 732
Redhill RH1 9FL

Our ref: GLA/2020/6100/S1/S1
Your ref: 20/04366/COOUT
Date: 14 September 2020

By Email

Dear Amanda

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

Ebury Bridge Estate, SW1 W8PX

Local Planning Authority reference: 20/04366/COOUT

I refer to the copy of the above planning application, which was received from you on 22 July 2020. On 14 September 2020, the Mayor considered a report on this proposal, reference GLA/2020/6100/S1/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 178 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The Mayor's Good Practice Guide to Estate Regeneration encourages landlords to use ballots as widely as possible, in addition to full and transparent consultation from the very start of the process, and meaningful ongoing involvement of those affected. It is disappointing that the applicant has not undertaken a ballot in respect of this scheme; the applicant is strongly encouraged to reconsider this option. GLA grant funding is required to be further explored in respect of the proposed scheme and the use of a ballot would improve an open and transparent approach to consultation to ensure the proposals reflect the genuine needs and best interests of local people.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Chloe Flower, e-mail ChloeFlower@tfl.gov.uk, telephone 020 7126 4155.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Finlayson', with a long horizontal flourish extending to the right.

John Finlayson
Head of Development Management

cc Tony Devenish, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, TfL
Mr Nick Finney, Arup

Ebury Bridge Estate, SW1W8PX

in the City of Westminster

planning application ref: 20/04366/COOUT

Strategic planning application stage 1 referral

Town and Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.

The proposal

A hybrid application for a mixed-use development comprising an outline scheme of circa 758 residential units (56% affordable housing), up to 3,018 sq.m. of retail, community, leisure and workspace uses in nine blocks up to 19 storeys in height and a detailed scheme for 226 residential units (78% affordable housing) within two blocks 17 and 18 storeys in height; and the provision of basement; access; amenity; landscaping, car and cycle parking and servicing.

The applicant

The applicant is **Westminster City Council**, and the architect is **astudio**.

Strategic issues

Principle of estate regeneration: The proposed development would secure a net increase in existing affordable housing floorspace on a like for like tenure basis and would accord with the Mayor's key principles for estate regeneration schemes. As such, the comprehensive redevelopment of the existing affordable housing can be supported (paragraphs 24 to 48).

Land use principle: The optimisation of land and contribution towards increased housing delivery is supported. The inclusion of non-residential land uses, including community uses, is appropriate in strategic planning terms, and the objectives of the CAZ. Clarification in respect of the re-provision of the existing multi-use games area is required (paragraphs 51-64).

Affordable housing: The scheme proposes 758 residential units of which 56% is proposed as affordable housing, by habitable room (51% by unit), with a tenure split of 81% social rent to 19% intermediate housing. Discounting the affordable housing re-provision requirement, this equates to 55% affordable housing on the uplifted accommodation, with a tenure split of 65% low cost rent and 35% intermediate housing. The submitted viability information is being scrutinised to ensure the maximum quantum and affordability of affordable housing. Early, mid and late stage viability review mechanisms, and affordability levels for the various affordable housing tenures should be confirmed and secured (paragraphs 67-78).

Design and heritage: The height, massing and architecture do not raise strategic concern. However, the lack of private outdoor amenity for some units within the detailed phase, and the provision of an alternative access core, should be further explored. The design code should be secured to ensure a high-quality environment for future residents. Further consideration of the play strategy is required. The report details that the proposal will result in less than substantial harm to the setting of designated heritage assets, which is outweighed by public benefits, subject to resolution of the affordable housing position (paragraphs 82-137).

Other strategic planning issues relating to **transport, energy, air quality, flood risk, drainage, water efficiency** and **urban greening** also require resolution.

Recommendation

That the City of Westminster Council be advised that the application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 178 of this report; but that the possible remedies set out in this report could address these deficiencies.

Context

1 On 22 July 2020, the Mayor of London received documents from Westminster City Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town and Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Intend to Publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- *Category 1C(1c) - "Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London".*
- *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*

3 Once Westminster City Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

5 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended 2018) has been taken into account in the consideration of this case.

Site description

6 The site is 1.86 hectares in size and is located to the south of London Victoria train station and to the north of the River Thames in the City of Westminster. The site's eastern boundary is formed by the railway lines running into Victoria station with Battersea and Nine Elms beyond. To the west, the site fronts Ebury Bridge Road with the development site of the former Chelsea Barracks opposite and the boundary of the Belgravia Conservation Area. To the north is the elevated Ebury Bridge which runs over the railway lines. The site adjoins Grosvenor Waterside development to the south, a primarily residential development. The surrounding area is predominantly residential in character.

7 The existing site comprises 336 flats arranged across 13 linear blocks of varying heights: Bridge House, Pimlico House, Mercer House, Westbourne House,

Rye House, Bucknill House, Victoria House, Wellesley House, Wainwright House, Dalton House, Hillersdon House, Doneraile House and Edgson House (now demolished). The blocks were built in the 1930s, with the exception of Edgson and Wainwright Houses which were completed in the 1950s and 1980s, respectively. The application documents set out that 198 of the housing units are classified as socially rented units with the remaining 138 held in private leaseholds.

8 Prior to demolition of Edgson House, the community-specific provision across the Ebury Bridge Estate comprised 154sqm in the basement of Edgson House and a separate 23sqm community gardening building.

9 There are 14 retail units (846 sq.m. of A use classes) that front onto Ebury Bridge Road, spread across the ground floor of Rye House and Bucknill House. The application documents set out that three of these retail units are vacant.

10 The site sits within the Central Activities Zone (CAZ). The site sits just outside the Victoria Opportunity Area and the Boundary of Central London as defined by the Town and Country Planning (Mayor of London Order) 2008. The site is identified as a key development site within the Westminster Draft City Plan (2019-2040) and as a strategic site for residential, social, community floorspace and refurbished retail and improved public realm within Westminster's City Plan (November 2016).

11 The closest section of the Transport for London Road Network is Eccleston Bridge located 0.4 kilometres to the north. The site benefits from an excellent public transport access level (PTAL) of 6b, on a scale of 1 – 6b where 6b is the highest. Sloane Square Underground, Pimlico Underground and Victoria Underground and Rail Station are within 0.7 – 0.9 kilometres from the site. There are bus stops on Ebury Bridge and Ebury Bridge Road which provide strategic connections throughout London. Victoria Coach Station is 0.4km north, Cadogan Pier and Millbank Pier are 30min walking distance to the south. A cycle hire docking station (29 bikes) is located to the north of the site on Ebury Bridge.

Details of the proposal

12 A hybrid application seeks outline permission for a mixed use development for approximately 758 residential units, up to 3,018 sq.m. of non-residential floorspace comprising flexible retail, community, leisure and workspace uses (Classes A1 - A4, D1-D2 and B1); provision of basement; pedestrian and vehicular access; amenity and spaces, plant, landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works; and detailed permission for Blocks 7 and 8 comprising 226 residential units; provision of a basement; pedestrian and vehicular access; amenity spaces, landscaping, car and cycle parking, refuse storage and servicing area.

13 The overall breakdown of the housing for the detailed proposals is set out in Table 1, below:

Table 1 – Housing Proposals

Outline												
	1 Bed		2 Bed		3 Bed		4 Bed		5 Bed		Total	
	Units	HR	Units	HR	Units	HR	Units	HR	Units	HR	Units	HR
Social Rent	27	54	71	213	58	232	11	55	3	18	170	572
Intermediate	18	36	12	36	12	48	0	0	0	0	42	120
Private	157	314	152	456	11	44	0	0	0	0	320	814
Total	202	404	235	705	81	324	11	55	3	18	532	1,506
Detailed												
	1 Bed		2 Bed		3 Bed		4 Bed		5 Bed		Total	
	Units	HR	Units	HR	Units	HR	Units	HR	Units	HR	Units	HR
Social Rent	27	54	60	180	36	144	6	30	1	6	130	414
Intermediate	24	48	17	51	3	12	0	0	0	0	44	111
Private	17	34	23	69	12	48	0	0	0	0	52	151
Total	68	136	100	300	51	204	6	30	1	6	226	676

Case history

14 GLA officers held a pre-application meeting on this scheme on 15 October 2019. The pre-application report (reference number GLA/3318a) issued by GLA officers concluded that the proposed estate regeneration scheme is generally supported in strategic planning terms, subject to satisfactorily addressing the matters raised with respect to the estate regeneration principles set out in the Mayor’s Good Practice Guide to Estate Regeneration: Better Homes for Local People (2018), non-residential land uses, affordable housing, urban design, heritage, inclusive access, energy, water and green infrastructure and transport. Follow up pre-application meetings were held on the 24 March 2020 and 27 May 2020 where matters of energy, design and viability were discussed.

Ebury Bridge Estate

15 Westminster City Council granted permission on the 7 March 2016 (LPA reference: 14/01295/COFUL) for the demolition of 8 existing residential buildings and the partial redevelopment of the estate to form 273 new dwellings comprising 119 x 1 bedroom, 93 x 2 bedroom, 54 x 3 bedroom, 5 x 4 bedroom and 2 x 5 bedroom homes, with 156 affordable and 117 private dwellings in buildings varying in height from 4 to 14 storeys, with A1/A2 and D1 uses within the ground floor and basement to Edgson House. This case (GLA reference: 3318) was considered at Stage II by the former Mayor of London on 5 March 2015 who advised Westminster Council that he was content for it to determine the case itself, subject to any action that the Secretary of State might take. GLA Officers understand that the approved scheme was deemed unviable and failed to attract a delivery partner. This permission was unimplemented and expired in 2019.

Wellesley House, Wainwright House, Dalton House, Hillersdon House, Pimlico House and Mercer House

16 On 10 October 2019, Westminster City Council granted a prior approval notification (LPA Reference: 19/06951/APAD) of intention to demolish Wellesley House, Wainwright House, Dalton House, Hillersdon House, Pimlico House and Mercer House pursuant to Prior Approval under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Demolition of these blocks has commenced.

17 Prior Approval applications are not referable to the Mayor and the Mayor was not consulted in respect of this application.

Edgson House

18 On 7 January 2019, Westminster City Council granted permission (LPA reference: 18/08372/COFUL) for the demolition of Edgson House; back-filling of basement, regrading of site and laying out of portacabins for use for a temporary period of up to three years for a variety of social and community uses.

19 On 17 September 2019, Westminster City Council granted permission (LPA reference: 19/05038/COFUL) for the use of former site of Edgson House as temporary community space (Class D1), cafe (Class A3) and workspace/retail units (Class A1 and/or Class B1) with associated landscaping and temporary structures, for a period of up to 5 years.

20 These two applications (18/08372/COFUL and 19/05038/COFUL) were also not referable to the Mayor of London. Edgson House has been demolished and the meanwhile facilities are at an advanced stage of construction.

Strategic planning issues and relevant policies and guidance

21 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Westminster City Plan (2016); saved policies in the City of Westminster UDP (2007, saved in 2010) and the London Plan 2016 (Consolidated with Alterations since 2011).

22 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance;
- The London Plan Intend to Publish Version (December 2019) which should be taken into account on the basis explained in the NPPF;
- On the 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation;
- The Mayor's Affordable Housing and Viability SPG;
- The Mayor's Good Practice Guidance to Estate Regeneration (2018);
- Westminster City Plan (2019-2040) – Regulation 19, Publication Draft and Policies Map (June 2019), together with the Council's schedule of proposed minor modifications (November 2019) and Submission Policies Map (November 2019) all of which have been submitted for Examination in Public (EiP)

23 The relevant issues and corresponding policies are, as follows:

- Estate regeneration London Plan; Mayor's Intend to Publish London Plan; Mayor's Good Practice Guide to Estate Regeneration (2018).
- Equalities London Plan; Mayor's Intend to Publish London Plan; Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG.
- Central Activities Zone London Plan; Mayor's Intend to Publish London Plan; Central Activities Zone SPG.
- Sports facilities and social infrastructure London Plan; Mayor's Intend to Publish London Plan; Social Infrastructure SPG.
- Housing and affordable housing London Plan; Mayor's Intend to Publish London Plan; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Character and Context SPG. Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.
- Urban design and heritage London Plan; Mayor's Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG; World Heritage Sites SPG.
- Strategic views London Plan; Mayor's Intend to Publish London Plan; London View Management Framework SPG.
- Inclusive design London Plan; Mayor's Intend to Publish London Plan; Accessible London: Achieving an Inclusive Environment SPG.
- Sustainable development London Plan; Mayor's Intend to Publish London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy.
- Air quality London Plan; Mayor's Intend to Publish London Plan; Control of dust and emissions during construction SPG.
- Ambient noise London Plan; Mayor's Intend to Publish London Plan; the Mayor's Environment Strategy.
- Transport London Plan; Mayor's Transport Strategy.

Principle of estate regeneration

24 As the development proposes the demolition of existing affordable housing, this element of the proposal is subject to strategic policies and planning guidance relating to the replacement of existing housing and estate regeneration as set out within London Plan Policy 3.14, Policy H8 of the Mayor's Intend to Publish London Plan, with further guidance provided in the Mayor's Affordable Housing and Viability SPG and the Mayor's Good Practice Guide to Estate Regeneration (GPGER).

25 London Plan Policy 3.14 states that the loss of existing housing, including affordable housing, should be resisted unless it is replaced at existing and higher densities with at least equivalent floorspace. Policy H8 of the Mayor's Intend to Publish London Plan seeks to resist the demolition of affordable housing unless it is

replaced by an equivalent amount of affordable housing floorspace, and seeks that replacement affordable housing is integrated into the development to ensure mixed and inclusive communities.

26 As set out in the Mayor’s Intend to Publish London Plan, all estate regeneration schemes should take into account and reflect the following key principles set out in the Mayor’s Good Practice Guide to Estate Regeneration (GGER) which apply to all estate regeneration schemes in London:

- like for like replacement of existing affordable housing floorspace
- an increase in affordable housing
- full rights of return for any social housing tenants
- fair deal for leaseholders/freeholders
- full and transparent consultation and involvement.

27 There are 336 existing residential units located within the subject site. The tenure and typology of these units is detailed in the Table 2, below:

Table 2 – Existing housing.

Tenure	1 Bed	2 Bed	3 Bed	4+ Bed	Total Units	Total Habitable Rooms	Total Floorspace (GIA)
Social Rent Housing	84	85	20	9	198	548	11,352 sq.m.
Private Housing	44	64	21	9	138	411	9,014 sq.m.
Total	128	149	41	18	336	959	20,366 sq.m.

Like for like replacement

28 As set out above, the loss of existing affordable housing should be resisted unless it is replaced by an equivalent amount of affordable housing floorspace (with no overall net loss). Policy H8 of the Mayor’s Intend to Publish London Plan, confirms that replacement affordable housing must be provided at social rent levels, where it is being provided to facilitate a right of return for existing social rent tenants. The requirement for like for like replacement affordable housing floorspace applies to the 198 social rent units located on the existing site.

29 The applicant has provided details of the existing affordable housing floorspace on site to enable GLA officers to assess compliance against the above strategic policies and guidance. This assessment is set out below. While the uplift in intermediate housing floorspace is required to be confirmed, the assessment demonstrates that there would be a net increase in terms of social rent accommodation, intermediate housing and overall affordable housing by all metrics, with a significant increase in social rented floorspace and overall affordable housing

floorspace which is the key criteria applied by Policy 3.14 and H8. The quality of the accommodation proposed would also be substantially enhanced.

Table 3 – Existing affordable housing

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	198	548	11,352 sq.m.
Intermediate	0	0	0 sq.m.

Table 4 – Proposed affordable housing

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	300	986	23,940 sq.m.
Intermediate (Rent/Ownership)	86	231	To be confirmed.

Table 5 – Net change in affordable housing by tenure

	Units	Habitable rooms	Floorspace (GIA)
Social Rent	102	438	+12,588 sq.m.
Intermediate (Rent/Ownership)	86	231	To be confirmed.

Right to return

30 The GPGER seeks to ensure that social tenants have a full right to return to a property on the regenerated estate of a suitable size, taking into account levels of overcrowding or under-occupancy within each household, and at the same or similar rent level, with the same security of tenure.

31 The Estate Regeneration Statement sets out that a key pledge of the development is a '*right of return is guaranteed for all secure tenants and resident leaseholders*'. The applicant has provided a statement of community involvement that states that all current secure tenants and resident leaseholders (who have lived in their home for more than one year) will have the right to return to a new home with the majority able to move once straight into their new home. The applicant has further stated that secure tenants will return to the estate on a social rent. This is strongly supported in accordance with GPGER principles.

32 Since permission for the redevelopment of the estate was granted in 2016 (LPA reference: 14/01295/COFUL, since expired), Westminster City Council 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.

33 It is emphasised that GLA Officers are not supportive of this process in principle; specifically, the decanting of social housing residents into offsite locations on a temporary basis without a deliverable approved scheme to move back into, and the subsequent demolition of existing affordable homes and community facilities, without approval for re-provision. While it is acknowledged that this demolition process has taken place pursuant to prior approval procedures which are not referable to the

Mayor of London, GLA Officers nonetheless highlight that the premise of demolishing housing, including affordable homes, without approved re-provision is contrary to London Plan 3.14 and Policy H8 of the Mayor's Intend to Publish London Plan.

34 A decant strategy has been provided within the Estate Regeneration Statement provided with the application which sets out:

- To date 122 secure tenants and their families have moved from the estate (either temporarily or permanently)
- 120 were re-housed in Westminster with 2 choosing to move out of the borough (1 of whom would like to return).
- Of the total who have moved, 75 households have signalled they want to return to the new estate.
- 47 households have chosen to permanently move to another home in Westminster
- 71 secure tenants currently remain on the estate with 64 of these households expressing a desire to move into a new home once built
- Two resident leasehold households have temporarily moved and expressed a wish to return to a new home on the estate
- It is expected that approximately 25 resident leaseholders will be supported to return to a new home on the redeveloped estate

35 The application details that the majority of the residents that have vacated the estate will be re-housed in phase 1 (Detailed application). Specifically, the Estate Regeneration Statement sets out that there is an opportunity to provide all existing secure tenants and resident leaseholders (either onsite or temporarily decanted) a move into new homes in Phase 1, to mitigate further disruption. While the residents have been decanted to alternative accommodation prior to demolition of the buildings, and therefore will not be rehoused within one move, the delivery of a high quantum of social homes for existing Ebury Estate residents is strongly supported by GLA officers.

Fair deal for leaseholders

36 It is understood in addition to the 198 social rented homes, there are a total of 138 leasehold properties that form part of the existing Ebury Bridge Estate. In addition to the statutory home loss compensation, Westminster Council has produced a new policy to support all resident leaseholders impacted by renewal which includes the following features:

- An equity loan will be offered, where the leaseholder is buying one of the new homes directly from any developer. The council provides an interest free loan to bridge the gap between the leaseholder's contribution and the price of the new property
- Shared equity will be offered, where the leaseholder is buying one of the new homes directly from the council. The council bridges the gap between the leaseholder's contribution and the price of the new property, by having a share in the equity of the home
- Buy one of the new homes on a shared ownership basis.

- Buy one of the new homes outright, if they want to and can afford to. There is no obligation on them to buy in this way, even if they can afford to. If this option is chosen, they can buy a property of any size.
- Buy another leasehold property in the housing renewal area i.e. one that is not part of the redevelopment programme, if available. Where this is possible, assistance will be provided from the council to help them find one. In some cases, the council may be able to sell them a property from its own housing stock.
- Become a social or an intermediate tenant in the housing renewal area. This option will only be offered in special circumstances, such as where other home ownership options are not suitable or where leaseholders want to become tenants due to having health problems. Where it is agreed leaseholders will receive 75% of the market value of their property, rather than 100%.
- Receive help and support to move away from the housing renewal area. This can include help to find a property or with the whole process of buying. In some cases the council may be able to sell them a property in Westminster from its own housing stock. An equity loan or shared equity might be offered to buy another property close to the housing renewal area in limited circumstances.

37 The Mayor's GPGER sets out the principle that leaseholders affected by estate regeneration are treated fairly and fully compensated, in accordance with statutory duties. Whilst these detailed matters are subject to non-planning statutory requirements, GLA officers consider that the overall approach outlined accords with the key principle set out in the Mayor's GPGER in term of the fair treatment and compensation for leaseholders.

Full and transparent consultation

38 The Mayor's Intend to Publish London Plan and GPGER sets out the Mayor's aspirations for full and transparent consultation and meaningful ongoing involvement with estate residents throughout the regeneration process to ensure resident support.

39 From 18 July 2018, the Mayor requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of existing affordable or leasehold homes to demonstrate that they have secured resident support for their proposals through a ballot, subject to certain specified exemptions and transitional arrangements.

40 GLA grant funding has not been sought in respect of the proposed scheme and a residents' ballot has not been held. Whilst considerations around ballots and funding conditions are not planning issues, the Mayor encourages landlords to use ballots as widely as possible in line with his Good Practice Guide.

41 Policy H4 of the Mayor's Intend to Publish London Plan sets out that to achieve the strategic target for 50 per cent of all new homes delivered across London to be genuinely affordable, grant should be used to increase affordable housing delivery beyond the level that would otherwise be provided. Paragraph 4.4.4 of the Mayor's Intend to Publish London Plan schemes are expected to deliver at least the threshold level of affordable housing without grant or public subsidy and to increase this proportion through the use of grant and other subsidy, where available and paragraph

4.5.11 states that all schemes are expected to maximise the delivery of genuinely affordable housing and make the most efficient use of available resources to achieve this objective. Where grant or other public subsidy is available and would increase the proportion of affordable housing, this should be utilised.

42 In this instance, while GLA Officers consider the proposal will deliver a mixed tenure development, with a range of tenures provided within each of the blocks, in accordance with Policy H4(a)(2) and paragraphs 4.4.4 and 4.5.11 of the Mayor's Intend to Publish London Plan, the applicant must demonstrate alongside the viability review that the maximum level of affordable housing has been secured through investigation of grant. This is further discussed in the affordable housing section of this report.

43 Whilst GLA funding has not been sought in relation to this scheme full details of the engagement process undertaken have been set out in the applicant's submission and, overall, GLA officers consider that the approach followed accords with the key principle of full and transparent consultation and meaningful ongoing involvement as set out above.

44 Specifically, the statement of community involvement sets out that over 80% of Ebury Bridge Residents have been involved in shaping designs since 2017, that a strategic residents body (the "Community Futures Group") comprising of tenants, leaseholders and businesses has been formed and provided a resident voice in influencing the proposals, that various meetings were held with recognised amenity groups, resident associations and ward councillors and businesses to seek views on the renewal project, and that a variety of consultation methods have been used to enable residents to provide feedback on proposals.

Consideration of alternative options

45 Policy H8 states that before considering demolition of existing estates, alternative options should first be considered and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts.

46 The Estate Regeneration Statement provided with the application sets out that eight development scenarios were established with the community which ranged from full refurbishment of existing blocks through to wholesale redevelopment of the estate. This process culminated in the selection of Scenario 7, the full redevelopment of the existing estate and the creation of 750 new homes.

47 While the Statement sets out that viability was a basis of assessment of various scenarios, further information is required by GLA Officers to understand alternative options that were considered as part of the appraisal and balancing exercise for the proposed redevelopment of the estate.

Conclusion – estate regeneration

48 Overall, the proposed development would ensure a net increase in existing affordable housing floorspace on a tenure basis and would accord with the requirements and key principles for estate regeneration as set out in London Plan

Policy 3.14, Policy H8 of the Mayor's Intend to Publish London Plan and the associated guidance in the Mayor's Affordable Housing and Viability SPG and the Mayor's GPGER. Accordingly, the comprehensive redevelopment of the existing affordable housing can be supported.

Equalities

49 London Plan Policy 3.1 and Policy GG1 of the Intend to Publish London Plan highlight the diverse nature of London's population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

50 An equalities statement has been provided with the planning application that details a number of potential equalities impacts arising from the proposed redevelopment of the site. Identified impacts on residents during redevelopment relate to social infrastructure and access to services, access to finance and affordable housing, appropriate and accessible housing, health effects, safety and security, accessibility and mobility in the area and information and communication. Identified impacts on businesses during redevelopment relate to loss of business and/or employment, impact of redundancy on health and wellbeing, difficulty accessing commercial finance and reduced job satisfaction. Identified impacts on the community following redevelopment relate to improve housing provision, provision of community resources and improved social cohesion, improved public realm and green space, tackling crime and disorder, improved access mobility and navigation and new employment opportunities. The equalities statement includes a range of recommendations to avoid, remedy or mitigate negative impacts and secure and improve positive impacts. The Council should secure mitigations to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

Land use principle

Flexible non- residential uses

51 The site is located within the Central Activities Zone (CAZ). London Plan Policies 2.10 and 2.11 and Policies SD4 and SD5 of the Mayor's Intend to Publish London Plan outline that the unique roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced. Paragraph 2.4.6 of the Mayor's Intend to Publish London Plan recognise that the CAZ contains housing, social infrastructure and community uses to address the needs of residents, visitors and

workers. While not strategic functions of the CAZ, these locally orientated uses play an important role in the character and function of the Zone as a vibrant mixed-use area, ensuring activity and vitality at different times of the day and week. New residential development should be complementary and not compromise the strategic functions of the CAZ. Policy SD4(K) sets out that the quality and character of the predominantly residential neighbourhoods within the CAZ, where more local uses predominate, should be conserved and enhanced, and Policy SK(L) sets out that development of social infrastructure that meets the distinct needs of the CAZ should be supported.

52 The proposed non-residential element of the proposal is located within six blocks, as set out below:

Table 6: Non-residential proposals

Block	Uses
B1, B2, B3, B4	1,600 sq.m. Class A1-A4 / D1 where: Restaurants and cafes (A3) no more than 460 sq.m. Drinking Establishments (A4) no more than 340 sq.m. Non-residential institutions (D1) no more than 150 sq.m.
B5	350 sq.m. – Business (Class B1) 158 sq.m. - Non-residential institutions (Class D1)
B9	910 sq.m. Class D1/D2/A3 where Restaurants and cafes (A3) - no more than 130 sqm.m.

53 The proposals would result in a range of uses across the development, and GLA Officers consider the proposals present a mix of uses that provide a balance between ensuring that the provision of commercial floorspace on the site does not impact the locally oriented uses of this CAZ location, as well as ensuring there are services, facilities and employment opportunity on the site for the development’s new residents.

54 Prior to the demolition of Edgson House, the community-specific provision across the Ebury Bridge Estate comprised 154sqm in the basement of Edgson House and a separate 23 sq.m. community gardening building. The proposals include a 158 sq.m. community provision in Block 5 of within outline scheme, which will take the form of a designated community hall. The delivery of the community hall proposal should be secured within the grant of any planning permission. Management and maintenance of this space should also be secured within the grant of any planning permission, to ensure accessibility and affordability for all residents within the development.

55 The applicant has set out that the 23 sq.m. community garden building will not be reprovided within the scheme however that community gardening activities within the proposed development will be supported through the provision of community herb gardens on the podiums of the blocks themselves and through the utilisation of Social Value funding to employ local residents in the maintenance of the soft landscaping in the new public realm. While the provision of herb gardens within the podiums are supported in principle, noting that the podium levels will have access restricted to those residents who live outside the corresponding block, further consideration should be given to whether this separation of gardening facilities sufficiently offsets the community facility, or if a gardening facility/garden which is accessible to all units within the new

estate would be more appropriate for purposes of social cohesion and delivery of community benefits, and to ensure compliance with London Plan Policy 3.16 and Policy S1 of the Mayor's Intend to Publish London Plan and the GPGER.

56 Block 9 incorporates community, leisure and retail uses, with a minimum of 780 sq.m. to be delivered as D1/D2 land uses. The design and access statement indicates that this space could be used as a gym. In accordance with social infrastructure policies set out in the London Plan and the Mayor's Intend to Publish London Plan, the provision of community (D1 and D2) land uses within the development is supported.

57 The proposals set out that Block 5 includes 350sq.m. of B1 Class Use and this will be operated as flexible floorspace to accommodate offices or more informal work spaces for smaller businesses and start-ups. While the inclusion of B1 land use within this CAZ location is supported in principle, clarification should be provided in respect of the proposed B1 land uses, noting that the introduction of B1(c) land use could result in noise implications. Policy E3 of the Mayor's Intend to Publish London Plan sets out the requirements for affordable workspace. Council officers should consider this policy in respect of the B1 land use to strengthen and promote the commercial offer through generation of a range of economic opportunities. Management of the B1 workspace by a workspace provider should be secured by planning obligation.

58 The equalities statement sets out that existing businesses will be offered the first right of refusal on the new units available within the redevelopment. This is supported by GLA Officers and should be secured within a legal agreement. As businesses will need to relocate temporarily, the equalities statement sets out that the Council will work with the businesses to provide a phased rent increase over the next three years, to help mitigate financial impacts of moving to a higher value property. In line with London Plan Policy 4.9 and Policy E9 of the Intend to Publish London Plan, GLA Officers would further support a commitment to the provision of shops for small or independent retailers and a proportion of affordable retail space to strengthen and promote the retail offer.

59 The equalities statement further sets out that those businesses who wish to sell have been offered the chance to do so, with one business indicating they wish to pursue this, and the Council has provided a figure based on their rateable value to extinguish their lease. The statement details that a pharmacy was identified as providing essential services to those living on the Estate. The Council is currently looking into ways to maintain the pharmacy throughout the redevelopment. This is supported by GLA Officers.

Multi-use games area (MUGA)

60 London Plan Policy 3.19 states that proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted. Policy S5 of the Mayor's Intend to Publish London Plan states that development proposals for sports and recreation facilities should increase or enhance the provision of facilities in accessible locations, maximise the multiple use of facilities and encourage the colocation of services between sports providers, education providers and other community facilities.

61 Policy S5 of the Mayor's intend to publish London Plan identifies that existing sports and recreational land (including playing fields) facilities should be retained unless

an assessment shows the land or facilities are surplus to requirements at the local and sub-regional level, OR the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location OR the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. Policy S4 of the Mayor's Intend to Publish London Plan states that development proposals for schemes that are likely to be used by children and young people should not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

62 Further information is required to assess the proposals in the context of Policy S4 and S5 of the Mayor's Intend to Publish London Plan. While the re-provision of the MUGA is supported in principle, clarification of the existing and proposed facilities is required. It is unclear from the proposals if the existing MUGA (namely the "Ebury Bridge Sports Pitch") is publicly accessible, or only accessible to the existing residents. The size of the existing MUGA is also unclear. The difference in the size of the existing and proposed MUGA should be clarified.

63 The proposed MUGA is described as a softer partially fenced space able to accommodate play uses such as basketball and football games, alongside more informal activities like running and more general socialising. While the proposed development seeks to re-provide a MUGA of a higher and more useable quality than the existing MUGA, it is nonetheless understood the proposed MUGA is not of the same size as the existing MUGA, and GLA Officers are of the view that if the existing MUGA is publicly accessible, the existing MUGA space must be re-provided in addition to the play space requirement generated by the scheme itself.

64 The play space requirements for the residential element of the scheme are further discussed in the urban design section of this report and it is noted that because of the interlinked nature of the proposed play space proposals and the reduction in the size of the existing MUGA, clarification is required to ensure the replacement of the existing play and sports space is in accordance with Policy S4 and S5 of the Mayor's Intend to Publish London Plan, as well as the delivery of play space for the proposed residential element of the scheme.

Housing

65 London Plan Policy 3.3, in seeking to increase the supply of housing in London, sets borough housing targets, and in Table 3.1 puts the minimum annual monitoring target for City of Westminster at 10,677 additional homes between 2015 and 2025. The Mayor's Intend to Publish London Plan sets a ten-year target of 9,850 for the period 2019/2020 to 2028/2029. This proposed scheme would deliver approximately 758 new residential units which would contribute positively to the above housing targets. The principle of the optimisation of the site for residential development on the site is strongly supported. Affordable housing is discussed in further detail in the subsequent section of this report.

66 As detailed above, there is existing housing and affordable housing on the site, which must be re-provided in accordance with H8(A) and H8(D) of the Mayor's Intend to Publish London Plan.

Affordable Housing

67 London Plan Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing in all schemes. London Plan Policies 3.11 and 3.12, Policy H4 of the Mayor's Intend to Publish London Plan, as well as the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments.

68 The Mayor's Affordable Housing and Viability SPG and Policy H8 of the Mayor's Intend to Publish London Plan set out 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. A Financial Viability Appraisal (FVA) has been submitted as part of the application, which is currently being scrutinised by the Council and GLA officers to ensure the scheme provides the maximum viable amount of affordable housing.

Viability review mechanisms

69 As with all schemes which follow the 'Viability Tested Route', the application will be subject to both early implementation and late stage viability reviews, in accordance with Policy H6 of the Mayor's Intend to Publish London Plan. Early, mid and late-stage review mechanisms should ensure that any additional affordable housing is provided on-site where sufficient surplus profit is generated, in line with the Mayor's Affordable Housing and Viability SPG.

Tenure

70 Policy H6 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the borough as low cost rented homes or intermediate based on identified need. There is a presumption that the 40 per cent to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities.

71 The scheme proposes 758 residential units of which 56% is proposed as affordable housing, by habitable room (51% by unit). The proposals represent a tenure split of 81% social rented and 19% intermediate housing, by habitable room (or 78% low-cost rent and 22% intermediate, by unit).

72 Noting that 198 social rented homes (548 habitable rooms, 11,352 sq.m. of floorspace) and 138 private home (411 habitable rooms, 9,014 sq.m. of floorspace) must be reprovided in accordance with Policy H8 of the Mayor's Intend to Publish London Plan, this equates to an uplift of 55% affordable housing by habitable room (45%, by unit) with a tenure split of 65% low-cost rent and 35% intermediate housing by habitable room (or 54% low-cost rent and 46% intermediate housing by unit). This complies with the minimum tenure expectations set out in Policy H6 of the Mayor's Intend to Publish London Plan however Westminster Officers should confirm the proposal meets Council's Local Plan requirements and identified need in respect of affordable housing tenure within the City.

Phasing

73 It is noted that the detailed element of the scheme, namely Blocks 7 and 8, will deliver 226 units, of which 78% will be delivered as affordable housing (by habitable room), with a tenure split of 79% social rent and 21% intermediate tenures, by habitable room.

74 The proposals include a phasing plan which provides site boundaries for the delivery of the scheme within three phases. It is noted that the future reserved matters application will not be referred to the Mayor of London and that the phased delivery of the scheme has implications in respect the assessment of a number of elements of the development and compliance with the London Plan and the Mayor's Intend to Publish London Plan, for example affordable housing, social infrastructure, transport and play space. A full phasing plan should be provided in relation to the delivery of residential accommodation, community, leisure and commercial units, landscaping, and play space prior to grant of any planning permission. Page 86 of the Design and Access Statement indicatively shows social rent, intermediate and market tenures proposed to be located throughout each of the blocks within the outline scheme. This is strongly supported for the creation of mixed and inclusive communities. The delivery of affordable housing should be secured throughout the delivery of the development.

75 While not proposed within this application, it is noted that a 'meanwhile use', designed to act as the social hub of the estate, is planned to be located on the former site of Edgson House, and will provide shops, leisure and community spaces to be used by the local residents and visitors while the proposed development is under construction. This is supported by GLA Officers in respect of place-making and for the re-provision of already demolished community infrastructure.

Immediate rent

76 The application details that intermediate rented units are proposed and has indicatively set out that the proposals will comprise 65 Intermediate Affordable Rent Units (comprising 37x 1-beds, 17x 2 beds and 11x 3-beds). The nature of the intermediate rent product should be confirmed. Specifically, it should be confirmed if these will be offered as London Living Rent products, or else what level of discount to market rent would be offered. In accordance with the Mayor's Intend to Publish London Plan, all intermediate rented products should be affordable to incomes of up to £60,000.

Housing affordability

77 The Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's Intend to Publish London Plan; the Mayor's Affordable Housing and Viability SPG; and, the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products. The applicant is advised that the Mayor's preference is for affordable rent products to be secured at London Affordable Rent benchmark levels, and for intermediate homes to be secured as affordable to a range of incomes below the upper limit of £90,000 per annum and benchmarked against the monitoring figure of £56,200 per annum in the London Plan Annual Monitoring Report. All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement.

78 A draft of the legal agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing and Viability SPG.

Housing mix

79 London Plan Policies 3.8 and 3.11, as well as Policy H10 of the Mayor’s Intend to Publish London Plan, encourage a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.

80 The scheme proposes approximately 758 residential units with a range of typologies and tenures, as detailed in Table 1, above. Table 7 below provides an indicative dwelling mix across the Masterplan site, and compares the existing mix with the proposed mix:

Table 7: Existing and proposed indicative housing mix, by unit, across the masterplan site

	1-Bed	2-Bed	3-bed	4-bed	5-bed	Total
Existing	128	149	41	18	0	336
Proposed	270	335	132	17	4	758
Uplift	+142	+186	+91	-1	+4	422
% Uplift	34%	44%	21.5%	-0.5%	1%	100%
			22%			

81 The housing mix comprises a range of unit sizes including 1-beds, 2-beds and 3-beds, 4-beds and 5-beds, which is supported in principle. The uplift in quantum of a range of unit sizes across the site, including family sized units, is supported in principle. Subject to the Council confirming the proposed mix meets local need of the Borough as well as meeting the needs of existing residents returning to the site, GLA officers are supportive of the housing mix from a strategic perspective.

Urban design

82 The design principles in chapter seven of the London Plan and chapter 3 of the Mayor’s Intend to Publish London Plan expect all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality.

83 London Plan Policy 3.4 and Policy D3 of the Mayor’s Intend to Publish London Plan seek to optimise the potential of sites. As per Policy D3 of the Mayor’s Intend to Publish London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site’s attributes, its surrounding context and its capacity for growth.

Height, massing, layout and architecture

84 Policy 7.7 of the London Plan states that, among other assessment criteria, tall and large buildings should generally be limited to sites in the Central Activity Zone,

opportunity areas, areas of intensification or town centres that have good access to public transport. As discussed above, the site is located within the CAZ, and thus the principle of a tall building is supported by the London Plan. Policy D9 of the Mayor's Intend to Publish London Plan sets out that tall buildings should only be developed in locations that are identified in Development Plans. The site is allocated as a key development site and a strategic site within the Westminster's City Plan (November 2016) and Westminster Draft City Plan (2019-2040). Policy 42 of the Westminster Draft City Plan (2019-2040) relates to Building heights within the City and Policy 43 of the Westminster Draft City Plan (2019-2040) in relation to development of the Ebury Bridge Estate states that new buildings are required to "*respect the setting and views from the surrounding Georgian and Victorian terraces within the adjacent conservation areas; have the tallest element towards the northern end of the area marking Ebury Bridge and the crossing of the railway line, with building heights stepping down from this location*". Whilst appropriate building heights are not set out in this local policy, it is evident that buildings of some height and presence are envisaged on parts of this site.

85 There is a substantial increase in height in the proposed buildings compared to the existing character of the estate. It is noted that the detailed element of the scheme proposes two blocks, up to 17 and 18 stories in height, while the outline element of the scheme proposes maximum parameters for future blocks in metres, with indicative heights in storeys also provided. Lower blocks (up to 8 stories in height) are proposed along the western half of the site, with shoulder heights reducing down to 6 storeys fronting Ebury Bridge Road, reflecting the character of the surrounding area. The tallest blocks (up to 19 stories in height) are located adjacent to the railway lines on the eastern edge of the site, with shoulder heights reducing towards the centre of site. The proposed heights of the blocks seek to optimise the site through the increase in residential floorspace, including uplift in the provision of affordable housing, as well as providing community, leisure and commercial land uses. This accords with Policy 7.7(i) of the London Plan which requires that tall and large buildings make a significant contribution to local regeneration. The proposed variations in height are supported, as they respond to the surrounding context of the site, enabling wayfinding and providing architectural interest. On the basis of the above assessment, GLA Officers do not raise strategic concern in respect of the proposed tall buildings in principle.

86 The consideration of impacts on the wider historic environment and strategic views are outlined in the heritage section of this report.

87 The proposed massing of nine blocks seeks to optimise the site and the shoulder heights provides for variation and interest within the scheme. The shoulder heights also provide space for additional communal amenity through the provision of roof terraces. This is supported. As further discussed in the residential quality section of this report, the layout and massing of Blocks 7 and 8 within the detailed phase provides for a high quantum of dual aspect units. While the distance between Blocks 5-9 is only a minimum of 14 metres, noting that Blocks 7 and 8 will be delivered with a high proportion of dual aspect, and subject to securing of the residential quality within the outline phases of the scheme, no strategic concern of the proposed layout and massing of the taller blocks is raised. The residential quality (in respect of privacy, daylight and sunlight) of Blocks 1-4, which front onto Ebury Road and have even reduced minimum separating distances, should be scrutinised.

88 The architectural aesthetic will provide a good quality, contemporary design. The proposed brick cladding on the buildings along Ebury Bridge Road is sympathetic to the context and appropriate. This is supported and should be suitably secured.

Public realm and landscaping

89 The permeability within the site, as well the proposed improvements in visual connections within the estate are supported. The provision of commercial retail units within Blocks 1-4 fronting on Ebury Bridge Road is supported for activation of the street front and public realm, and the placement of retail and community uses within Blocks 5 and 9 is supported for provision of community spaces and activation of these spaces.

90 Further detail on landscape proposals should also be submitted as part of any reserved matters application; the landscaping should work to deliver for both commercial and residential uses. As further discussed in the play space section of this report, suitable mitigation should be secured to avoid conflicts between various users of the public realm. The Council should secure the cycle and pedestrian access through the site with a clear and legible route. Suitable wayfinding signage and mitigation should be secured.

91 The Council should secure the wind mitigation measures as recommended within the Environmental Statement.

92 In line with Policies D8 and S6 of the Mayor's Intend to Publish London Plan, the Council should secure the provision of free drinking water within the public realm and freely accessible public toilets suitable for a range of users, including 'Changing Places' toilets within the grant of any planning application. Management of these facilities should also be secured within a legal agreement.

Residential Quality

93 London Plan Policy 3.5 'Quality and Design of Housing Developments' and Policy D6 of the Mayor's Intend to Publish London Plan promote quality in new housing provision, with further guidance provided by the Housing SPG. Policy D4 of the Mayor's Intend to Publish London Plan sets out that masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the requirements set out in Part B of Policy D3.

94 The detailed phase includes the provision of 226 residential units of which detailed drawings are used in the assessment of residential quality. The detail proposed within the submitted design code provides the basis of assessment of quality of the residential elements proposed within the outline scheme.

Space standards

95 The planning statement states that all units within the detailed scheme will meet or exceed the minimum national space standards. The design code, included within Chapter 4 of the Design and Access Statement includes a requirement that all units within the outline scheme meet the minimum Nationally Described Space Standards. This is supported and should be secured.

Cores

96 Blocks 7 and 8 are buildings comprising single cores. The blocks, which are up to 18 storeys in height, serves a maximum of 8 units per floor. This accords with Standard 12 of the Housing SPG (March 2016). While it is noted that at terrace level of the upper levels, cores may have access to natural daylight however the provision of natural daylight and ventilation within the cores should be addressed. Noting the high usage of these cores and lobbies, with each core and entrance potentially being used by hundreds of residents, an alternative stairwell and access into the buildings should be explored. Management and maintenance of these spaces should also be secured.

97 Similarly, the provision of high quality core arrangements (as set out in the Housing SPG) should be a consideration in respect of the development of floor layouts for the outline phase of the scheme, and this should be secured within the design code or, notwithstanding the design code, by condition.

Aspect and privacy

98 The detailed scheme proposes 218 of the 226 residential units as dual aspect, which is supported. The high proportion of dual aspect units proposed is supported.

99 The planning statement sets out that the design code requires that that the majority be dual aspect with single aspect north facing units avoided, and that the units themselves be legibly laid out and fit for purpose. This is supported and should be secured. Consideration should be had to privacy of units, and noting the minimum distance between Blocks 1-4, single aspect units within these blocks should be avoided.

100 In terms of outdoor communal amenity space, Blocks 7 and 8 will each have an associated communal, landscaped podium garden, equipped with play space for children aged 0-4 years. In addition, Blocks 7 and 8 will each have a roof garden, accessible for all residents in the block and provided with table elements and timber pergolas. This is supported. Amenity and shaded features should be secured, as well as safety features and access for all residents.

101 The majority of units proposed within the detailed phase (191 out of the 226 units) will have access to private outdoor amenity. Six units within the detailed scheme will not have any external amenity, which does not comply with standards set out in the Housing SPG. While it is noted that these units have been provided with a larger internal size, it has not been fully explained why exceptional circumstances exist in this case that would justify this approach. The provision of private amenity space to all units must be further explored. There are 29 units (13%), located on the eastern edge adjacent to the railway where the site boundary constrains the extent that larger balconies can project will not have a balcony nor be larger in size internally but will rather be provided with smaller Juliet balconies which, with a minimum depth of 0.5m still allows space for standing outside. Nonetheless, noting that Juliet Balconies do not comply with residential amenity standards, this proposal does not offset the need for private outdoor amenity. While it is noted that these residents will also have access to the communal private and publicly open spaces proposed, as set out in the play space section of the report, these spaces are already strained with the

proposed quantum of residential development within the site, and as such, further consideration should be had to the provision of private amenity spaces for all units.

102 The provision of outdoor, communal amenity should be secured for blocks to be delivered within future phases, and the provision of private amenity for all future residential units in the outline phases should be secured.

Play space

103 London Plan Policy 3.6 and Policy S4 of the Mayor's Intend to Publish London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child.

104 The proposals include two public squares with play space, podium level play space, as well as a "Sports and Leisure Square" to the south of the site, with a MUGA. The application sets out that the proposal includes a total of 2,854 sq.m of play space, falling short of the total of 4,422 sq.m. required to achieve the quantum required by London Plan Policy 3.6 and Policy S4 of the Mayor's Intend to Publish London.

105 In respect of the detailed proposals, the application sets out that a total of 324 sq.m. of play space for children ages 0 - 3 years old will be provided on the first-floor podiums, 485 sq.m. of play space for children aged 4-10 will be provided in the centre of the new public square, and no play space for children aged 12+ years will be provided within Phase 1 however, by virtue of phasing, the existing MUGA to the south of the estate will remain in situ as Blocks 7 and 8 are built out and occupied. While it is noted that the provision of play space within Phase 1 of the development and the early implementation of play is supported in accordance with the Shaping Neighbourhoods: Play and Informal Recreation SPG, the applicant should provide a detailed breakdown of the play requirements and provision by age for within Phase 1, to ensure the need of the Phase 1 residents is met. The provision of appropriate quantum and quality of play space should be secured in each phase of the proposed development.

106 The applicant has noted that the proposals represent a substantial increase above the existing play space; however, noting the significant uplift in residential accommodation proposed within the site, and noting that the proposals comprise the comprehensive redevelopment of the estate, the relevance of this comparison between the existing estate and proposed redevelopment is unclear. Specifically, it is unclear why the shortfall of policy compliant levels of play space is acceptable within this proposed development. Noting the large size of the application site and also the significant uplift in quantum of residential accommodation, the applicant should set out the detailed planning constraints of why play space requirements cannot be achieved on-site.

107 The application makes reference to two offsite locations (Battersea Park and Chelsea Barracks Leisure Centre) to address the shortfall in the provision of play space for the 12+ age group. The DAS indicates that the north-eastern corner of Battersea Park is within 800 metres walk of the site. The DAS further states there are three locations for play within 800 metres walk for the 5-11 age bracket which

potentially could offset the deficit in the proposed scheme. Subject to the acceptance of justification in relation to the planning constraints, evidence is required to demonstrate that the proposed off-site play provision fully satisfies the needs of the development whilst continuing to meet the needs to existing residents. Subject to addressing this requirement of the SPG, Westminster City Council should secure the off-site play provision of the 5-11 and 12+ age brackets (creation of new provision, improvements to existing play facilities and/or an appropriate financial contribution) within a legal agreement.

108 Noting that the proposed play spaces sit within a “roundabout” type landscaped feature (namely ‘Public Square with Play (north)’ and ‘Public Square with Play (south)’) that can be circumnavigated by vehicles, mitigation to avoid user conflicts between children, pedestrians, vehicles and cyclists should be secured by the Council.

109 The provision of on-site high quality, safe, playable features for children, as well as safety measures and shaded spaces, should be secured by the Council via condition or legal obligation.

110 As discussed in the Land Use Principle section of this report, there is a MUGA known as the “Ebury Bridge Sports Pitch” within the existing site, and the reprovided MUGA will not be of a similar size. Furthermore, it is unclear if the existing MUGA is accessible to the existing public. The provision of play space should be addressed in the context of Policy S4 and S5 to ensure there is no net loss of existing play and sporting facilities, and to ensure the proposals meet the needs of both future residents and needs of existing residents and the wider community.

111 The proposals set out that all ground-level on-site play space will be shared by all residents regardless of tenure. This is supported in accordance with Policy S4 of the Mayor’s Intend to Publish London Plan, and this must be secure within any planning permission. The proposals further set out that play space located on block podiums will be accessible to all residents within the respective blocks regardless of tenure. GLA Officers recognise that the scheme has been designed to be “tenure blind” and that social rent, intermediate and market tenures are all located within both Blocks 7 and 8, and are indicatively proposed to be located throughout each of the blocks within the outline scheme (and as above, should be secured). Noting there may be some segregation in the proposed play spaces at podium level through the restriction of access to residents of each respective block, the Council should ensure that all play spaces provided at podium levels are “tenure-blind” in terms of both quantum of play space and quality of playable features.

Fire Statement

112 In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the Mayor’s Intend to Publish London Plan seeks to ensure that development proposals achieve the highest standards of fire safety. In accordance with Policy D12, a Fire Strategy (Fire Statement) has been submitted with the application. To demonstrate compliance with Policy D12, the fire statement must be revised to include the qualifications of the assessor who has prepared the document; this should be specified within the statement.

113 The submitted fire strategy sets out that the main objective of the document is to satisfy the functional life safety requirements of Part B of the UK Building Regulations 2010 and the report concludes that overall it is considered that the life safety standards required for compliance with the Building Regulations can be achieved within Blocks 7 and 8 of the Ebury Bridge Estate. While the consideration of these elements at an early stage in design development is welcomed; this does not address the policy requirements of Policy D12 of the Mayor's Intend to Publish London Plan which, in the interests of fire safety and to ensure the safety of all building users, seeks to ensure that development proposals achieve the highest standards of fire safety. Further information should be provided within the statement that details how Blocks 7 and 8 will ensure that any potential future modifications to the building will take into account and not compromise the base build fire safety / protection measure. In addition, it should be confirmed that, in accordance with Policy D5(b) of the Mayor's Intend to Publish London Plan, in both Blocks 7 and 8, a minimum of one lift per core (or more subject to capacity assessments) is a suitably sized fire evacuation lift; this should be suitable for use to evacuate people who require level access from the building.

114 The Council should secure the provision of fire statements for future phases of the outline scheme which clearly address (in appropriate sections) the requirements outlined in Policy D12 (part B,1-6) of the Mayor's Intend to Publish London Plan, including: construction methods and materials; means of escape for all building users; fire safety features, which reduce the risk to life; access for fire service personnel and equipment; access within the site for fire appliances; and how potential future modifications to the building will take into account, and not comprise, the base build fire safety and protection measures. As above, in accordance with Policy D5(b) of the Mayor's Intend to Publish London Plan sets out that, in all developments where lifts are installed, a minimum of one lift per core (or more subject to capacity assessments) should be secured as a suitably sized fire evacuation lift; this should be suitable for use to evacuate people who require level access from the building and should be addressed and secured within the revised fire statement

Heritage

115 London Plan Policy 7.8. and Policy HC1 of the Mayor's Intend to Publish London Plan state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "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". The NPPF states that when considering the impact of the proposal 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

116 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse 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. Where a development will lead to 'less than substantial harm', the harm should be

weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

117 The site does not contain any designated heritage assets nor is the site located within a conservation area. There are statutorily listed buildings and structures, and conservation areas in close proximity to the site. The impact of the proposed development on these heritage assets is assessed, below.

Statutorily listed buildings and structures

118 There are a number of listed buildings and structures in proximity to the site. The heritage, townscape and visual impact assessment (HTVIA) submitted with the application considers the impact of the proposed development on 72 listed buildings and structures and concludes that the proposals will have less than substantial harm British Airways Terminal (Grade II) as demonstrated in the HTVIA, including view 1 and 14. As described within the HTVIA, the proposed development will appear in the background setting of the clock tower of the Grade II listed building. The HTVIA sets out that the perspective view would create an overlaying of forms in the background, with the varying façade treatments of the buildings adding richness and interest, while their height below the shoulder of the clock tower keeps them secondary to it. GLA Officers agree that the level of harm to the Grade II British Airways Terminal is less than substantial.

119 GLA officers also consider the harm to the change in setting to the buildings opposite the development on Ebury Road, namely the Grade II listed Nos. 20 to 42 (even) Ebury Bridge Road including garden railings, to be less than substantial harm. The level of harm to the setting has been mitigated as the replacement buildings have been sensitively designed in terms of height, scale, façade detail and materiality, with the brick buildings along Ebury Bridge Road, closest to the listed building, designed with the upper two storeys set back.

Conservation areas

120 The site is located across the road, to the south-east, from the Belgravia Conservation Area. Although the existing buildings are located outside the boundaries of Belgravia Conservation Area, due to the character of the existing estate buildings, GLA Officers consider contribute to the context and historic setting of the Belgravia Conservation Area, and that the demolition of the existing estate buildings result in some harm to the conservation area. The heritage, townscape and visual impact assessment (HTVIA) provided with the application sets out that the replacement of the existing buildings with the proposed development, phased over nine years, would result in an overall major change to the setting of this limited edge of the conservation area. This change is demonstrated in views provided within the HTVIA, including View 22.

121 The HTVIA provided with the application further sets the replacement buildings have been sensitively designed in terms of height, scale, façade detail and materiality, with the brick buildings along Ebury Bridge Road, closest to the conservation area, designed with the upper two storeys set back. As such, GLA consider that the level of impact of the proposed development on the setting of the neighbouring Belgravia Conservation Area has been mitigated through the proposed

design of the new buildings, and that the resulting harm from the proposals would be less than substantial.

122 The site is also located approximately 85 metres to the north-west of the Pimlico Conservation Area. The HTVIA sets out that the tall buildings of the proposed development, alongside the railway lines, will however introduce new elements to the western setting of the conservation area. It will be visible in a number of westerly views such as along Warwick Way, Westmoreland Place and Sutherland Street, as demonstrated in views provided within the HTVIA, including View 11.

123 The site is also located approximately 450 metres to the north of the Grosvenor Gardens Conservation Area. The HTVIA sets out that the development site is currently not visible from the Grosvenor Gardens Conservation Area and that Phase 1 of the development will be visible above the northern wing of the Grade II listed National Audit Office (former British Airways Terminal) from the eastern edge of the conservation area (view 1 in chapter 9) and that Buildings 5 and 6 of Phase 2 will be visible to the left of the clock tower, adding to the layering of different architectural forms in the view.

124 The site is located approximately 100 metres to the east of the Peabody Avenue Conservation Area. The HTVIA sets out that as existing, there is a visual connection between the two housing developments, with the open character of the intervening railway line allowing for views from the conservation area towards the site, and that as two distinctive and historic social housing developments, but with differing aesthetics and origins, they provide a snapshot of how approaches to social housing evolved between the mid-19th to mid-20th centuries in this part of Westminster. The THVIA sets out that the proposed development introduces new high quality tall buildings, separated from the conservation area by the railway lines and rail infrastructure and that the introduction of new buildings that will continue to be used for social housing, maintains the historic relationship between the conservation area and the development site.

125 The site is located approximately 200 metres from the Royal Hospital Conservation Area. The THVIA sets out that the proposed development would alter the wider setting of the conservation area and that the tops of some of the taller buildings on the eastern part of the site may be just visible from some positions within the conservation area, but filtered by trees, both in summer and winter.

126 GLA Officers consider that the level of harm resulting from the proposals on the Pimlico Conservation Area, the Grosvenor Gardens Conservation Area, the Peabody Avenue Conservation Area and the Royal Hospital Conservation Area to be less than substantial.

Registered parks and gardens

127 The HTVIA provided with the application considers the impact of the proposed development on the Grade II listed Royal Hospital, Chelsea and Ranelagh Gardens, Grade II listed Warwick Square, Grade II listed Eccleston Square and Grade II* listed Battersea Park.

128 The HTVIA outlines that the proposed development will lead to a change in the wider setting of Warwick Square, but it will not be visible within its setting. GLA Officers consider there will be no harm to Warwick Square.

129 The HTVIA sets out that the tops of the some of the taller buildings on the eastern part of the site may be just visible above the Chelsea Barracks development from some positions within the Royal Hospital, Chelsea and Ranelagh Gardens, but filtered by trees, both in summer and winter. Similarly, the HTVIA sets out that when viewed from the north side of the Eccleston Square, the proposed development will be obscured by the mature trees in the square gardens during summer, but in winter sporadic glimpses of the tops of the taller buildings to the south-west corner of the square will be possible, albeit heavily filtered through the overlying branches of the trees. The HTVIA also considers that from Battersea Park, the proposed development, other than a slither of Building 6, will be fully obscured in the summer months owing to the trees in the Royal Hospital grounds. In the winter months, the very top of the taller buildings may be just glimpsed through the branches of the foreground trees along with other existing buildings.

130 GLA Officers consider that the harm to Battersea Park, Eccleston Square, and Royal Hospital, Chelsea and Ranelagh Gardens to be less than substantial.

London View Management Framework

131 GLA Officers do not consider the proposal will impact on the strategic views protected by Policy 7.11 of the London Plan and Policy HC3 of the Mayor's Intend to Publish London Plan.

World Heritage Site

132 Policy HC2 sets out that development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment. Policy D9(e) of the Mayor's Intend to Publish London Plan states that buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.

133 The site is located approximately two kilometres to the south-west of the Palace of Westminster and Westminster Abbey including Saint Margaret's Church. While it is noted that the THVIA states that the proposed development "*would not intrude upon [...] the settings of World Heritage Sites*", this has not been demonstrated with the provided THVIA. Relevant wireline views should be provided to ensure compliance with Policies 7.8, and 7.10 of the London Plan and HC1 and HC2 of the Mayor's Intend to Publish London Plan.

Overall heritage considerations

134 The scheme proposes a number of public benefits including the regeneration of the area, reprovion and uplift in affordable housing (subject to the independent verification of the viability position), housing, community and leisure land uses, public

realm, and economic benefits, and creation of jobs during construction and operation in a high-quality development.

135 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, subject to the independent verification of the viability position, GLA officers are satisfied that the less than substantial harm identified within this report is outweighed by the public benefits of the proposal.

136 As noted above, verified views should be provided to enable a comprehensive heritage assessment to be made and to ensure compliance with Policies 7.8, and 7.10 of the London Plan and HC1 and HC2 of the Mayor's Intend to Publish London Plan in respect of the impact of the proposed development on Palace of Westminster and Westminster Abbey including Saint Margaret's Church.

137 Noting the high-quality design of the scheme, it is considered that the proposed development is generally sympathetic to the form, scale, materials and architectural detail of the nearby designated heritage assets (as considered above), and the scheme accords with London Plan Policy 7.8. and Policy HC1 of the Mayor's Intend to Publish London Plan.

Inclusive design

138 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy 3.8 'Housing Choice' and Policy D7 of the Mayor's Intend to Publish London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

139 The proposal states that 90% of the new dwellings designed to meet Building Regulations Approved Document M4(2) and 10% will meet Part M4(3). This is included within the design code. The Council should ensure policy compliant levels of accessible dwellings are carried through to the detailed design and delivery stages, and that the proposed M4(3) units are provided across a variety of housing typologies, tenure and locations within the scheme to give disabled and older people similar choices to non-disabled people.

Environment

Energy

140 To ensure compliance with policies of the London Plan and the Mayor's Intend to Publish London Plan, further information is required in respect of a number of elements of the energy strategy. This includes information on *Be Lean, Be Clean and Be Green measures*, as well as overheating, carbon performance and carbon offsetting. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.

Air quality

Technical air quality assessment review

141 Given the conservative assessment methodology, the conclusion that the air quality effects of the proposed development will be not significant is accepted. However, conditions should be imposed and further information should be provided by the applicant to ensure that the proposed development complies with all London Plan and Mayor's Intend to Publish London Plan policies.

142 Specifically, the applicant is advised that the use of 2018 background concentrations and emissions factors is conservative. It is broadly acknowledged that Defra's EFT v9 emissions factors are more representative of the reductions in emissions measured in recent years, especially in central and inner London. It is advised that, in order to continue to provide a degree of conservatism, the full development traffic is modelled using EFT emissions factors and backgrounds appropriate to the first year that the development will be operational.

143 It is noted that Ebury Bridge has been modelled at 18 metres. This is not considered the correct height at which to model this road link (too high), and should be revisited.

Air quality conditions

144 To ensure future occupants of the proposed development are not exposed to poor air quality in accordance with London Plan Policy 7.14 (B) and Policy SI 1 (B) of the Mayor's Intend to Publish London Plan, it is recommended a pre-commencement condition is imposed requiring that in the absence of appropriate, nearby local authority monitoring data, a site-specific air quality monitoring survey (for nitrogen dioxide) is carried out to establish baseline air quality condition across the site. The monitoring survey should be carried out in line with the LLAQM.TG(19) technical guidance.

145 In addition to the above, it is recommended that the following conditions are imposed during the construction phase of the scheme:

- All on-road vehicles during the construction phase must meet the Central London Ultra Low Emission Zone emissions standards. Reason: To minimise the deterioration of local air quality as a result of emissions from construction vehicles and to ensure compliance with London Plan Policy 7.14 (B) and Policy SI 1 (D) of the Mayor's Intend to Publish London Plan.
- Construction plant must comply with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London. Reason: To minimise the deterioration of local air quality as a result of emissions from construction vehicles and to ensure compliance with London Plan Policy 7.14 (B) and Policy SI 1 (D) of the Mayor's Intend to Publish London Plan.
- Measures to control emissions during construction and demolition for a high-risk site must be implemented throughout the construction phase. Reason: To

prevent adverse impacts of dust and PM₁₀ emissions on local air quality arising from the construction works and to ensure compliance with London Plan Policy 7.14 (B) and Policy SI 1 (D) of the Mayor's Intend to Publish London Plan.

Air quality summary

146 The assessment has demonstrated that the proposed development will lead to minor and moderate adverse impacts on existing air quality during both the construction and operational phases. These impacts occur at locations where the air quality objective is already exceeded and do not introduce any new exceedances of the objectives. However, it is noted that the assessment methodology is overly conservative and further information should be provided as per the technical air quality assessment review section of this report, below.

147 The assessment has demonstrated that future residents of the proposed development will not experience air quality exceeding the relevant objective levels. Therefore, future residents will experience acceptable air quality.

148 The proposed development is air quality neutral and thus complies with London Plan Policy 7.14 (B) (c) and Intend to Publish London Plan Policy SI 1 (B) (2a).

Flood risk

149 The site is in Flood Zone 3, in an area benefitting from River Thames tidal defences. A Flood Risk Assessment (FRA) has been submitted as required under the NPPF. The FRA considers the risk of flooding from a range of sources, but does not adequately address the residual risk of flooding due to a breach of River Thames defences.

150 The proposed development includes sleeping accommodation at the ground floor which is estimated at 0.5 metres below the breach flood level. In addition, building services and fire safety rooms are located at basement levels without identified flood resilience measures.

151 A Flood Warning and Evacuation plan should be prepared and submitted in support of the proposed development.

152 The Flood Risk Assessment provided for the proposed development does not comply with London Plan Policy 5.12 and Policy SI.12 of the Mayor's Intend to Publish London Plan, as it does not give appropriate regard to residual flood risks, and the need for resilience and emergency planning measures.

Sustainable drainage

153 The surface water drainage strategy provides an assessment of greenfield runoff rates, existing runoff rates, and attenuation storage required to restrict the 100 year (plus 40% climate change) post-development discharge rate to 9.2l/s. No assessment of greenfield runoff rate has been made, and no consideration has been given to the practicality of discharging at greenfield rate. Discharge rates can be

readily restricted to well below 5l/s using suitably protected orifice plates or proprietary products such as vortex control devices.

154 The surface water drainage strategy addresses the Drainage Hierarchy, and includes rainwater harvesting, blue roofs, rain gardens, permeable paving. The use of rainwater harvesting within the buildings and include green roofs should be further explored.

155 Hydraulic calculations to support the proposed attenuation volumes has only been provided for the detailed application area. Evidence to support the outline application area of the proposed development should be supported.

156 The surface water drainage strategy for the proposed development does not comply with London Plan Policy 5.13 and Policy SI.13 of the Mayor's Intend to Publish London Plan, as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate. Further details on how SuDS measures at the top of the drainage hierarchy will be fully included in the development, and how greenfield runoff rate will be achieved should be provided. Additional attenuation storage volume calculations should be provided.

Water efficiency

157 The sustainability statement proposes that the proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, in line with the optional standard in Part G of the Building Regulations, and compliant with Policy 5.15 of the London Plan and Policy SI.5 of the Mayor's Intend to Publish London Plan.

158 Water efficiency information has not been provided for the non-residential components of the development. The proposed development does not meet the requirements of London Plan Policy 5.15 and Policy SI.5 of the Mayor' Intend to Publish London Plan as it has not been demonstrated that the proposal meets the water consumption targets of these policies.

Urban greening and trees

159 The proposed development would result in the loss of 26 trees, including 1 Category A tree. The outline and detailed proposals combined are estimated to result in the planting of 229 trees, resulting in a net gain of 203 trees.

160 An urban greening factor (UGF) for the detailed part of the application has been calculated as 20, which falls below the target of 0.4 for predominantly residential development set by Policy G5 of the Mayor's Intend to Publish London Plan. The UGF calculation has excluded areas for vehicular access, which is not the approach set out by the policy, which states the calculation should be based on the Total Site Area. The true UGF of the proposed development is therefore likely to be lower than 0.20.

161 One of the key ways by which proposed development can achieve the UGF target is through the provision of green roofs across all available roof space. The proposed development does not propose green roofs across Blocks 5, 6, 7, 8 and 9 citing health and safety concerns. However, other schemes across London have

demonstrated it is possible to integrate biodiverse green roofs at this height when urban greening has been considered as a fundamental element of site and building design, in line with London Plan Policy 5.10 and Policy G1 of the Mayor's Intend to Publish London Plan.

162 The proposed urban greening should be reviewed, seeking to improve the quality or quantity, to increase the UGF of the proposed development. Features for consideration may include: improving the number, extent and quality of green roofs, increasing ground level planting in place of hard landscaping, including green walls or greening sections of the building façade, and expanding greening on the proposed terraces. Following any design review, a drawing showing the surface cover types and accompanying UGF calculation should be submitted prior to stage 2. The applicant should prepare the UGF based on the total site area, using the illustrative scheme masterplan for the outline parts of the site to demonstrate an UGF of 0.4 is achievable.

Circular economy

163 The proposal has considered circular economy principles, as required by Policy SI 7 of the Mayor's Intend to Publish London Plan. Technical comments in respect of circular economy will be circulated to the Council under a separate cover.

Transport

Access, Circulation and Highways

164 The site access arrangement will be reconfigured to take account of the revised internal site layout. New pedestrian/cycle access will be provided on both the north and south of the site and the existing vehicular accesses on Ebury Bridge Road will be repositioned. As all bounding roads are borough roads, the acceptability of the access arrangements should be agreed with the Council. A bus stop is required to be repositioned to accommodate the proposals; the applicant must agree the details of this with TfL prior to determination. From a strategic transport perspective, increase in options to access the site is supported as it creates a more permeable, connected and integrated development in comparison with the existing site layout.

Healthy Streets and Vision Zero

165 The Healthy Streets Indicators score for the internal site area increases from 71 to 86 which is welcomed. Overall the proposal meets the requirements of the Policy T2 of the Mayor's Intend to Publish London Plan. The proposed landscaping, planting and greenery will allow for 'places to stop and rest' and provide 'shade and shelter' to create a high-quality environment for future residents. A segregated walking and cycling route through the site will improve connectivity with the surrounding area and provide an alternative to Ebury Bridge Road.

166 Overall, the Active Travel Zone (ATZ) assessment highlights that the site is an established area, but improvements for cyclists should be considered by the applicant. The proposals have been subject to a Stage 1 Road Safety Audit (RSA); the recommendations should be discussed and agreed with the Council as the highway authority in line with the Mayor's Vision Zero Action Plan.

Car parking

167 The proposed development is car free with the exception of disabled persons car parking. Policy T6.1 of the Mayor's Intend to Publish London Plan sets out a requirement for 3% of residential units to have a disabled persons parking space, with passive provision for a further 7%, this equates to 23 and 53 spaces respectively. Here, a total of 42 car parking spaces for disabled persons are proposed, equating to 5.5% of units. The applicant confirmed at pre-app stage that due to the public realm design there is not space to provide passive parking provision. Whilst this does not fully confirm with Policy T6.1 of the Mayor's Intend to Publish London Plan, it is acceptable in this instance. Spaces should be leased rather than sold, 50% of spaces will have active Electric Vehicle Charging and 50% will have passive provision. As part of the legal agreement, residents should be restricted from obtaining residential parking permits.

Cycle parking and cycle hire

168 Cycle parking will be finalised at reserved matters stage for the outline permission. The applicant must commit to providing high-quality parking in line with the Policy T5 Mayor's Intend to Publish Plan and Chapter 8 of the London Cycle Design Standards (LCDS), and this must be secured by condition.

169 For the detailed application, the 445 long-stay and 44 short-stay spaces are proposed which meets the requirements of Policy 5 of the Mayor's Intend to Publish London plan. In line with the LCDS, 5% of the total spaces are designed for larger or adapted cycles. Cycle storage is split up into small clusters within the basement and meets LCDS requirements in terms of numbers of doors to pass through, width of doors and lift dimensions.

170 The cycle hire docking station on Ebury Bridge Road is proposed to be extended as part of the proposals. However, the applicant must continue to consult TfL on the proposed location. All costs associated with the cycle hire mitigation should be met by the applicant, which will be confirmed once the location has been agreed.

Trip generation

171 A trip generation exercise has been undertaken which concludes that the development is expected to give rise to a net increase of a worst-case peak hour flow of 374 two-way trips in the AM peak, of which more than 90% would be undertaken by sustainable modes. The impact of trips on LU station capacity and line loading has been assessed as required by Policy T1 of the Mayor's Intend to Publish London Plan, and subject to review, mitigation may be required.

Travel planning

172 A framework travel plan containing measures and targets supporting sustainable travel objectives of the MTS and London Plan has been submitted. The final travel plan should be secured, in line with Policy T4 of the Mayor's Intend to Publish London Plan.

Delivery, servicing and construction

173 All servicing activity will take place on street which does not meet Policy T7 of the Mayor's Intend to Publish London Plan which endorses off-street servicing. Delivery and servicing activity should be strictly managed and consolidated where possible through strict measures and targets written into the delivery and servicing plan (DSP). As the site is bounded by borough roads, the Council should agree the final DSP in consultation with TfL.

Construction

174 The full construction logistics plan (CLP) (and commitment to producing it in phases over 8 years) should be secured by condition and approved in consultation with TfL, prior to commencement of development in line with Policies T4 and T7 of the Mayor's Intend to Publish London Plan.

Local planning authority's position

175 GLA Officers understand that Westminster City Council planning officers have engaged in pre-application discussions with the applicant and are undertaking an assessment of the submitted planning application.

Legal considerations

176 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

177 There are no financial considerations at this stage.

Conclusion

178 London Plan and the Mayor's Intend to Publish London Plan policies on estate regeneration, the Central Activities Zone, sports facilities and social infrastructure, equalities, housing, affordable housing, urban design, play space, heritage, inclusive design, energy, circular economy air quality, flood risk, sustainable drainage, water efficiency, urban greening, trees and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan and the Mayor's Intend to Publish London Plan:

- **Principle of estate regeneration:** The proposed development would secure a net increase in existing affordable housing floorspace on a like for like tenure basis and would accord with the Mayor's key principles for estate regeneration schemes. As such, the comprehensive redevelopment of the existing affordable housing can be supported.
- **Land use principle:** The optimisation of land and contribution towards increased housing delivery are supported. The inclusion of non-residential land uses, including community uses, is appropriate in strategic planning terms, and the objectives of the Central Activities Zone (CAZ) location. Further clarification in respect of the re-provision of the existing multi-use games area is required.
- **Affordable housing:** The scheme proposes 758 residential units of which 56% is proposed as affordable housing, by habitable room (51% by unit), with a tenure split of 81% social rent to 19% intermediate housing. Discounting the affordable housing re-provision requirement, this equates to 55% affordable housing on the uplifted accommodation, with a tenure split of 65% low cost rent and 35% intermediate housing. The submitted viability information is being scrutinised to ensure the maximum quantum and affordability of affordable housing. Early, mid and late stage viability review mechanisms, and affordability levels for the various affordable housing tenures should be confirmed and secured.
- **Design and heritage:** The height, massing and architecture do not raise strategic concern. However, the lack of private outdoor amenity for some units within the detailed phase, and the provision of an alternative access core, should be further explored. The design code should be secured to ensure a high-quality environment for future residents. Further consideration of the play strategy is required. The proposal will result in less than substantial harm to the setting of designated heritage assets, which is outweighed by public benefits, subject to resolution of the affordable housing position.
- **Energy:** Further information is required in respect of a number of elements of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.
- **Air quality:** The full development traffic should be modelled using EFT emissions factors and backgrounds appropriate to the first year that the development will be operational. The height of the Ebury Bridge road link used for modelling purposes should be revisited. A condition should be imposed requiring that a site-specific air quality monitoring survey (for nitrogen dioxide) is carried out to establish baseline air quality condition across the site, and conditions should be imposed in relation to the construction phases of the scheme.
- **Flood risk and drainage:** The proposals do not give appropriate regard to residual flood risks, and the need for resilience and emergency planning measures. A Flood Warning and Evacuation plan should be prepared and submitted in support of the proposed development. This needs to be addressed. Further details on how SuDS measures at the top of the drainage hierarchy will be fully included in the development, and how greenfield runoff rate will be achieved should be provided. Additional attenuation storage volume calculations should be provided.

- **Urban greening:** The applicant should review the urban greening proposed to increase the UGF to meet the target score of 0.4. Following any design review, a drawing showing the surface cover types and accompanying UGF calculation should be submitted prior to stage 2. The applicant should prepare the UGF based on the total site area, using the illustrative scheme masterplan for the outline parts of the site to demonstrate an UGF of 0.4 is achievable.
- **Transport:** Cycle hire mitigation is required. TfL must be consulted in regards to the proposed bus stop location. Construction logistics, deliveries, servicing, travel plans and cycle parking should be secured by conditions and obligations.

for further information, contact GLA Planning Unit (Development Management):

Lucinda Turner, Assistant Director of Planning

Lucinda.Turner@london.gov.uk

John Finlayson, Head of Development Management

John.Finlayson@london.gov.uk

Allison Flight, Deputy Head of Development Management

Alison.Flight@london.gov.uk

Katherine Wood, Team Leader – Development Management

Katherine.Wood@london.gov.uk

Emily Leslie, Senior Strategic Planner, Case Officer

Emily.Leslie@london.gov.uk
