



# HYBRID PLANNING APPLICATION PLANNING STATEMENT JULY 2020

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# ARUP

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# 0 Executive Summary

WCC believes in building a City for All, where everybody can have a place they are proud to call home and as a result have embarked on an ambitious affordable housing programme. Key to this programme is the vision for the Ebury Bridge Estate which is to set a new standard in estate regeneration.

In partnership with Ebury Bridge residents therefore, WCC is taking forward a scheme that seeks the comprehensive renewal of the existing estate by way of the submission of a Hybrid Outline Planning Application. This application will provide the strategic framework for the estate's redevelopment – securing the following benefits:

- Creation of a vibrant, modern neighbourhood for both the existing and new residents;
- Delivery of more homes, of which at least 50% will be affordable;
- Replacement of all existing affordable homes with uplift, allowing residents to stay on site;
- Tenure blind approach to facilitate a genuinely mixed and balanced community;
- Alleviation of fuel poverty through the provision of affordable renewable energy sources and highly efficient homes;
- Well insulted homes with opportunities for both natural ventilation and active cooling to ensure the residents are both acoustically and thermally comfortable throughout the year;
- Spacious new homes of which, more than 90% are to be dual aspect with none that are single aspect north facing;
- Net increase in playspace across the entirety of the Site, both in quality and quantum terms;
- Provision of a flexible MUGA that is open and more inclusive for use by all;
- Delivery of high quality and well-lit public open spaces that comprise public squares, access routes and gateways;
- Comprehensive shrub and tree planting strategy that will see a biodiversity and ecological net gain;
- Enhanced and legible connections to the wider street network with a new north south link through the development;
- Net increase in workspace and retail facilities to provide services to existing and new residents whilst also supporting the Ebury Local Centre;

- Incorporation of sustainable urban drainage systems such as blue roofs, rainwater harvesting and rain gardens;
- Net increase in provision of community facilities across the Site, both in quality and quantum terms. This will include the provision of a larger, flexible and modern community hall to replace that previously in Edgson House.

This Planning Statement explores the proposal in more detail, describing the physical context of the Site itself; any relevant planning history; and the preapplication consultation process; before examining the proposal details within the context of current and emerging planning policy.

In summary, the illustrative Masterplan proposed will ensure the creation of an indicative 758 homes, comprising a replacement of the 336 homes currently on site alongside an uplift of 422. These will be delivered as a mix of sizes, of which more than 50% will be affordable, within 9 distinct blocks. The design of these blocks has been sensitively devised to reflect and respect the varied heights, character and articulation of the surrounding context.

Alongside the residential element, up to 3,018sqm of non-residential floorspace is proposed along key frontages which represents a substantial increase above the current provision. As part of this, an uplift in community floorspace, both in terms of quantum and quality, is also proposed. As part of this Hybrid Outline Application, Blocks 7 and 8 are being sought in detail and will comprise a combined 226 residential units.

As set out in this Planning Statement it is concluded that the proposal complies with both local and strategic policy frameworks. and sits fully within the context of the Council's aspirations for a City for All – underpinned by targeted, sustainable growth and built environment enhancements that optimise the use of this brownfield site.

# 1 Introduction

# 1.1 Background

This Planning Statement has been prepared by Ove Arup and Partners Ltd. ('Arup') on behalf of Westminster City Council's regeneration team (the 'Applicant') in support of a Hybrid Outline Application for the renewal of the Ebury Bridge Estate, Ebury Bridge Road, London, SW1W 8PX ('the Site'). The Site falls within the administrative area of Westminster City Council ('WCC') and therefore the WCC Local Planning Authority ('WCC LPA') will determine the planning application.

The Applicant is the freehold owner of the site. There are however a number of other leaseholders, tenants, stakeholders and interests across the site with whom there has been extensive consultation and engagement. Details of this process and how it has informed the proposal are set out in the submitted Statement of Community Involvement ('SCI') (EBR-04).

# **1.2 Description of Development**

This Hybrid Outline Application is for ('the Proposed Development'):

- A mixed use development in outline for residential floorspace and ancillary residential facilities (Class C3) non-residential floorspace comprising flexible retail (Classes A1 A4), community (Class D1), leisure (Class D2) and workspace (Class B1) floorspace; provision of basement; new pedestrian and vehicular access; and associated amenity space, open space, plant, landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works; and
- Detailed planning consent for Blocks 7 and 8 comprising residential floorspace and ancillary residential facilities (Class C3); provision of a basement; new pedestrian and vehicular access; and associated amenity space landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works.

As part of this proposal the outline element ('the Outline Area') would comprise up to 36,610sqm residential floorspace (equating to an illustrative 532 residential units); and up to 3,018sqm non-residential floorspace. It is being submitted with all matters reserved. This approach has been adopted to establish the principle and character of the wider Site's redevelopment – whilst allowing the necessary flexibility for blocks to be designed and constructed in the future with due consideration to changing context.

The detailed consent ('the Detailed Area') includes 226 residential units proposed across Blocks 7 and 8, which comprise two buildings up to 18 storeys and 17 storeys in height respectively; with a basement. As a detailed consent, construction of these two blocks can start on Site expediently, ensuring the decant and rehousing of existing residents can occur with minimal upheaval.

# **1.3** Content of Submission

The scope and form of this submission has been discussed and agreed with the planning officers at WCC LPA. The application is comprised of the following documents:

Ref	Document Title					
	Application Form, CIL Additional Information Form, Cover Letter and Notifications					
EBR-DRG	Drawings - Sitewide Location Plans and Masterplan / Existing and Proposed Site Elevations / Outline Parameter Plans / Detailed Area Plans / Detailed Landscape Plans					
EBR-01	Planning Statement					
EBR-02	Planning Development Specification					
EBR-03-A	Estate Regeneration Statement					
EBR-03-B	Estate Management Strategy					
EBR-04	Statement of Community Involvement					
EBR-05	Design and Access Statement (incl. the Architectural and Landscape Design Code at Chapters 4 and 5 respectively)					
EBR-06	Daylight and Sunlight Report					
EBR-07	Flood Risk Assessment and Drainage Strategy					
EBR-08	Transport Assessment					
EBR-09	Energy and Sustainability Statement					
EBR-10	Arboricultural Report and Tree Survey					
EBR-11	Fire Strategy					
EBR-12	Equalities Impact Assessment					
EBR-13	Environmental Statement and Non-Technical Summary					
EBR-14	Construction Management Plan					
EBR-15	Utilities Statement					
EBR-16	Financial Viability Assessment					

Given the nature of this submission as a Hybrid Outline Application, five drawing packages are being submitted – the Site Plans and Masterplan; Existing and

Proposed Site Elevations; Outline Parameter Plans; Detailed Area Architectural Plans; and Detailed Area Landscape Plans. The full list of these drawings is included within Appendix A with an explanation of the purpose of each set out below.

### **1.3.1** Site Plans and Masterplan

This drawing set comprises the sitewide plans submitted as part of this application. It includes the baseline information of the existing estate pursuant to its current location, scale and layout; alongside the landscaping and building layout of the new illustrative Masterplan.

### **1.3.2** Existing and Proposed Site Elevations

This drawing set illustrates key elevations across and through the estate as existing, alongside the same elevations as proposed with the illustrative Masterplan in situ.

### **1.3.3 Outline Parameter Plans**

Alongside the Design and Access Statement and, within it in Chapters 4 and 5, the Design Code, the principles of the proposal sought in outline will be established through the Outline Parameter Plans. These plans have been devised to show the maximum development positions and extents pursuant to a number of fundamental design areas.

### 1.3.4 Detailed Architectural and Landscaping Plans for Blocks 7 and 8

Planning permission for Blocks 7, 8 and one of the public squares included in the Ebury Bridge Estate Masterplan is being sought in detail. Alongside the Design and Access Statement therefore, the design elements for the Detailed Area such as layout, access, scale, appearance and landscaping will be controlled through these drawing sets.

### **1.4 Purpose and Structure**

This Planning Statement sets out the detail of the proposals and its compliance with planning policy it is structured as follows:

- Section 2 describes the physical features of Site and surrounding area.
- Section 3 provides a summary of recent relevant planning history
- Section 4 summarises the public consultation and pre-application engagement with the WCC LPA and consultees to date.
- Section 5 outlines the Proposed Development.
- Section 6 explains the current and draft planning policy and other relevant material considerations, and assesses the Proposed Development for conformity.

- Section 7 outlines potential Heads of Terms and preliminary details of the Unilateral Undertaking to support this application.
- Section 8 Concludes by setting out the planning balance of the Proposed Development.

# 2 The Site and Surrounding Area

# 2.1 The Site

The Ebury Bridge Estate is located in the south west corner of the City of Westminster. It is bounded to the west by Ebury Bridge Road, to the north by Ebury Bridge, to the south by the recently constructed Grosvenor Waterside development and to the east by the railway line that connects to Victoria Station.

The original estate was constructed in the early 1930's and consisted of 9 blocks – with a further three blocks constructed in the late 1930's. Edgson House was subsequently completed in the 1950's and Wainwright House added in the 1980s. As a group therefore, heights across the estate range from 3 to 9 storeys, and comprised the following blocks:

- Rye House
- Westbourne House
- Bucknill House
- Victoria House
- Wainwright House
- Bridge House
- Pimlico House
- Mercer House
- Dalton House
- Hillersden House
- Wellesley House
- Edgson House
- Doneraile House
- Cheylesmore House

As illustrated in Figures 1 and 2 however, Cheylesmore House located in the south west corner of the estate is now held under a separate private freehold title so is no longer considered as part of the Site. Accordingly, the estate comprises 13 blocks accommodating 336 residential dwellings which are split into a mix of unit types as set out below in Table 1.

#### Table 1: Existing Unit and Habitable Room Split

	1 bed	2 bed	3 bed	4 bed	Total	GIA		
	Social Rented							
Units	84	85	20	9	198	11,352sqm		
Hab Rooms	168	255	80	45	548	-		
	Private Leasehold							
Units	44	64	21	9	138	9,014sqm		
Hab Rooms	88	189	84	50	411	-		

Whilst the existing estate comprises primarily residential land uses, there are commercial uses on the ground floor level of Bucknill House and Rye House fronting onto Ebury Bridge Road. These comprise 6 units in Rye House (2 x vacant; 1 x A1 Class Use; 1 x A2 Class Use; 1 x A3 Class Use; 1 x Ebury Bridge Regeneration Base) and 8 units in Bucknill House (1 x vacant; 7 x A1 Class Use), with a total cumulative floor area of 846sqm.

The blocks of Rye, Westbourne, Bucknill and Victoria located along the north western edge around two internal courtyards. Similarly, Doneraile House to the south east comprises a U-shaped footprint enclosing a parking courtyard. The remaining blocks however are linear in footprint and more irregular in their positioning – resulting in poorly defined open spaces and illegible and shaded pedestrian routes.

Despite this however, there are two large areas of open space towards the middle and south of the Site. The first is located between Edgson House and Hillersdon House and takes the form of open landscaping with trees and children's playspace. The second large area of open space is located between Doneraile House and Cheylesmore House and takes the form of a fenced Multi-Use Games Area.

There is limited tree coverage across the estate, with a concentration between Edgson House and Hillersdon House. Remaining trees are scattered around the Site's perimeter and between the existing blocks.



Figure 1: Existing Site Area

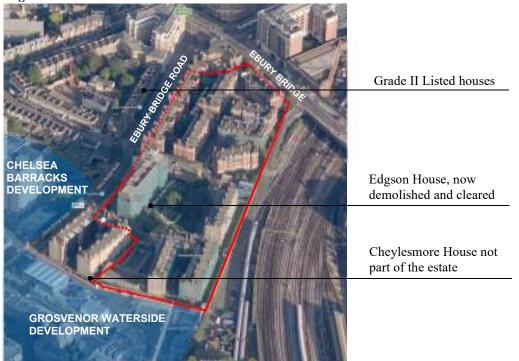


Figure 2: Site Overview

There has been a long-term aspiration to regenerate the estate since 2010 when the estate was first identified in WCC's Housing Renewal Strategy as one of five key estates within the borough in need of significant investment. Accordingly, in 2013 plans were put into motion to enhance a number of existing residential blocks along the western side of the Site and demolish and rebuild blocks along the eastern side. Following extensive consultation and a successful residents ballot, these plans culminated in the submission of a Full Planning Application in 2014 (LPA Ref: 14/01295/COFUL) which was subsequently approved in 2016. This proposal was found to be unviable however, remaining unimplemented and subsequently expiring in 2019.

In June 2017, attention turned to establishing more viable renewal options for the estate – with the Council making a commitment to continue working with residents in order to secure a way forward. Since this time, consultation with local residents has been ongoing, led by a team of dedicated on-site engagement officers who have continued to build relationships with households across the estate. These discussions culminated in the confirmation of the preferred renewal option being the comprehensive demolition and rebuild of the estate. The submitted SCI (EBR-04) provides more information about this consultation process with the Estate Regeneration Statement (EBR-03-A) noting the ongoing services and support that have and will continue to be provided to existing residents and businesses throughout the renewal.

Notwithstanding, since the original permission WCC has been undertaking a process of decanting residents from the remaining 13 buildings across the estate with the view that, if it is their preference, they can then be rehoused in new homes across the estate when they are constructed.

Edgson House, the tallest structure across the Site at 9 storeys and located to the central western edge, was one of the first buildings to benefit from vacant possession. In the interests of good estate management and to facilitate the delivery of an on-site community hub (to remain in situ throughout the estate's regeneration), it was demolished with approval secured in September 2019 for the creation of a "meanwhile" community space, café and workspace / retail units. At the time of writing, Edgson House had been demolished and the meanwhile facilities were at an advanced stage of construction.

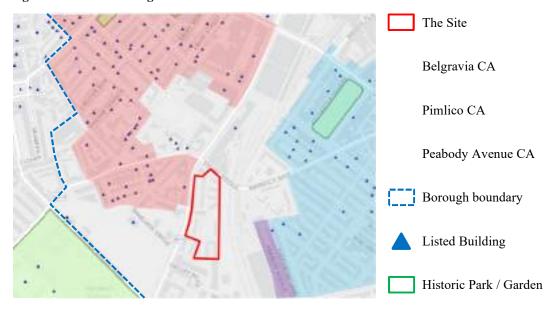
Edgson House aside, the ongoing decant will result in many units becoming empty and potentially subject to anti-social behaviour and maintenance issues. As such, the decision was taken to commence demolition of a number of buildings in advance of the submission of the Hybrid Outline Application for the estate's redevelopment. As set out in the next section, a Prior Approval for the phased demolition of these buildings was approved by the Council in October 2019.

### 2.2 Surrounding Area

Whilst many of the buildings on the estate itself date back to the 1930's, the local built vernacular is substantially more diverse – comprising streets of period three storey terraced houses constructed in the early 1800's; to larger masterplanned residential led developments that are still under construction. In this respect, whilst the immediately surrounding land uses are generally residential (albeit with ground floor commercial uses on main roads) the characters and heights across the built environment are diverse with no single design typology prevailing.

There are no Statutorily Listed Buildings within the Site's red line. However, the 3 storey residential terraced properties opposite the Site (nos. 20 - 42 [even] Ebury Bridge Road) are Grade II Listed, as illustrated in Figure 2. Beyond this and set out in more detail in Figure 3, Listed Buildings are scattered heavily across the built environment to north and west – with the nearest Grade I Listed Building to the Site being the Church of St Barnabas circa 160 metres away.

The Site itself and much of its immediate proximity is not located in a conservation area. As illustrated in Figure 3 however, there are a number of conservation areas in very close proximity which should be a consideration.



#### Figure 3: Listed Buildings and Conservation Areas within Site Context

Figure 2 illustrates the Ebury Bridge Estate's proximity to the completed Grosvenor Waterside Development to the south and the Chelsea Barracks Development to the west. Both are high density residential-led mixed use schemes which provide a contemporary vernacular.

The variety of both period and modern architectural styles and typologies means there are no prevailing heights within the context. Whilst the residential terraces properties across from the Site are 2 - 3 stories in height, the existing 1930's period mansion blocks both within and adjacent range from 4 - 9 storeys. 1 Ebury Bridge, a residential block adjacent to the north is 4 storeys high but by virtue of its large floor to ceiling heights, is similar in overall scale to the neighbouring 5 storey Rye House.

The Grosvenor Waterside Development comprises buildings ranging in height from 7 - 14 storeys and the Chelsea Barracks Proposal was consented to include blocks up to 11 storeys in height. Beyond the railway to the east, existing housing estate such as Abbots Manor and Glastonbury House include buildings 7 - 22 storeys high.

The Site has excellent connectivity. With a Public Transport Accessibility Level (PTAL) of 6b (which is the best), the Site is located within 800 metres of Victoria Underground Station (Victoria, Circle and District Lines) and Victoria Mainline Station; within 730 metres of Sloane Square Underground Station (Circle and District Lines) and within 550 metres of 10 bus routes. In addition to this, there is a Transport for London Cycle Hire Docking Station located on Ebury Bridge immediately adjacent to the Site to the north. This comprises 26 cycle spaces.

# **3** Planning History

The Council's online planning register identifies the following relevant planning applications for the Site:

Ref.	Description of Development	Status
14/01295/COFUL	Demolition of eight existing buildings and construction of four new buildings of between four and 14 storeys to provide 271 new flats (118 x 1 bedroom, 95 x 2 bedroom, 51 x 3 bedroom and 7 x 4 bedrooms) consisting of 129 social rent flats, 26 equity share flats and 116 private/market flats: use of ground/basement floors of Block 1 for Class A1/A2/D1 purposes; a replacement community room and children's playspace; new landscaping and pedestrian route through the site; new basement car park (62 spaces) and 12 surface level parking spaces.	Approved 07/03/2016. It is understood this development was not implemented, with the application subsequently lapsing in March 2019
18/08372/COFUL	Demolition of Edgson House; back-filling of basement, regrading of site and laying out portacabins for use for a temporary period of up to three years for a variety of social and community uses.	Approved 07/01/2019. Edgson House was subsequently demolished with the basement back- filled and site regraded in accordance with this permission. However, no temporary portacabins have been implemented pursuant.
19/05038/COFUL	Use of former site of Edgson House as temporary community space (Class D1), café (Class D1), café (Class A3) and workplace/retail units (Class A1 and/or Class B1) with associated landscaping and temporary structures, for a period of up to 5 years.	Approved 17/09/2019. With Edgson House demolished as per the above consent, this permission is currently being implemented.
19/06951/APAD	Notification of intention to demolish Wellesley House, Wainwright House, Dalton House, Hillersdon House, Pimlico House, Mercer House (Prior Approval under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted	Approved 10/10/2019.

Development)(England) Order 2015 (as amended).	
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# 4 **Consultation**

From the outset, WCC have been committed to redeveloping the Ebury Bridge Estate sensitively and in coordination with the needs and requirements of both the existing estate residents, WCC LPA, and other statutory and non-statutory consultees.

Accordingly, the Estate Regeneration Statement (EBR-03-A) and Statement of Community Involvement (EBR-04) submitted with this application provide comprehensive details of the breadth and diversity of the consultation undertaken in developing these masterplan proposals. An overview of this extensive consultation process is set out in this section of the Planning Statement.

# 4.1 Local Community

Engagement with the local community has been fundamental to the principle and evolution of the estate's redevelopment, with its renewal having been a topic for discussion since 2010. This early consultation process culminated in a successful resident ballot and submission of a Full Application for a mix of new build and enhancement in 2014. This scheme was however found to be unviable with discussions commencing with the community again in 2017.

The final proposal for the estate emerged following a structured period of engagement with residents across the following key stages:

- Vision and Objectives (July October 2017): This shaped the key pledges and aims for the renewal proposal. It was informed by large-scale surveys conducted via face to face door knocking, a website and fortnightly newsletters.
- Options Appraisal (October 2017 March 2018): Workshops with leaseholders, secure tenants and temporary accommodation households took place. During these workshops, a full review of the options developed prior was carried out with any new or fundamental aspirations for the future scheme carried forward. This was supported by the creation of a resident-led strategic body (The Ebury Bridge Community Futures Group) who were tasked with the role of supporting local residents and businesses in their consideration of the regeneration proposals. The Community Futures Group held monthly meetings alongside more informal drop-ins which enabled residents to develop a set of key design principles.
- Narrowing down the Options (March April 2018): Eight development scenarios were established, with residents and the Community Futures Group provided with detailed training on traditional developer-led viability assessments. This enabled residents to analyse the different scenarios (including the previously consented scheme though using up to date benchmarking figures). This culminated in the selection of Scenario 7, which proposed the full redevelopment of the estate and the creation of circa 750 homes. Consultations with residents on this final option proceeded in line with Section 105 of the Housing Act 1985.

- Shaping the Preferred Scenario (May June 2018): This stage included surveys, pop-up consultation events and door to door questionnaires with a view to refining the development proposal. The preferred scenario was then presented to WCC in July 2018 who gave it the green light to proceed through to pre-planning.
- Best Value and Delivery Options (July 2018 February 2019): In order to ascertain how best the scheme could be delivered, residents were invited to soft market testing to explore which delivery route would be most appropriate.
- Pre-planning Consultation (October 2019 February 2020): Following works to define the housing and tenure mix, the scheme was presented to residents via a number of engagement channels including a dedicated consultation space on Ebury Bridge Road; resident drop-in surgeries; an Ebury Bridge website with an online engagement tool; newsletters; leaflet drops; more formal public exhibitions

In addition to the above, across September - November 2019 when the design was sufficiently advanced 14 meetings were held with the following local amenity groups and councillors:

- Gatliff Close Residents Association;
- Ebury Village Forum;
- Belgravia Society;
- Westmoreland Triangle Residents Association;
- 1 Ebury Bridge Road Residents;
- Cheylesmore House Residents Association;
- Consort Rise Committee;
- Belgravia Neighbourhood Forum;
- Pimlico Neighbourhood Forum;
- 20th Century Society;
- Churchill Ward Councillors;
- Warwick Ward Councillors;
- Knightsbridge & Belgravia Ward Councillors;
- Royal Hospital Ward Councillors (Kensington and Chelsea);

### 4.2 Local Planning Authority

During the pre-application period, the project team has engaged with the WCC LPA comprehensively to shape the design of the Proposed Development. As set out in the table below, this included regular formal pre-application meetings that were structured with defined agendas and topics for discussion. This ensured the key aspects and principles of the design could evolve with full transparency and that any queries could be addressed efficiently.

This process culminated in the issue of a Final Pre-Application Note on the 18<sup>th</sup> June 2020. This note included the LPA's feedback on the principles of the key matters discussed and the additional information or assessments expected to support the submission.

Meeting No.	Date	Торіс
1	11 <sup>th</sup> June 2019	Transport
2	25 <sup>th</sup> June 2019	Public realm / landscape / playspace
3	10 <sup>th</sup> July 2019	Height / massing / views
4	25 <sup>th</sup> July 2019	External materials
5	15 <sup>th</sup> August 2019	Energy / BREEAM / Environmental
6	12 <sup>th</sup> September 2019	Land use layout / home design
7	7 <sup>th</sup> November 2019	Height / mass / daylight / sunlight
8	5 <sup>th</sup> December 2019	Public consultation feedback
9	20 <sup>th</sup> February 2020	Uses, transport and landscaping

### 4.3 The Greater London Authority

A pre-application meeting was held with the GLA on 15<sup>th</sup> October 2019. This meeting was to primarily discuss the higher level principles of the scheme relating to the estate regeneration process, variation and provision of land uses, affordable housing, design, heritage, sustainability and transport. The respective formal written Advice Letter received on 10<sup>th</sup> December 2019 was positive. It noted that the proposed estate regeneration is generally supported in strategic terms.

Subsequent to this and after additional design work, follow-up pre-application meetings were held with GLA Officers on 24<sup>th</sup> March and 27<sup>th</sup> May 2020 with a focus on scheme viability and affordable housing provision.

### 4.4 Crossrail 2

The site falls under the March 2015 Safeguarding Directions for Development Affecting the Route and Associated Works Proposed by Transport for London for the Crossrail 2 Rail Project made by the Secretary of State for Transport. The north-west tip of the site falls within the Limits of Land Subject to Consultation as defined on drawing sheet no.18. Accordingly, the proposals have been discussed with TfL/Crossrail 2 and a meeting was held on 28<sup>th</sup> May 2019. A technical note regarding the design requirements is enclosed at Appendix B of this report.

### 4.5 Other Consultee Engagement

Other statutory and stakeholder engagement has included meetings and dialogue with the following:

- Transport for London ('TfL')
- Historic England
- Greater London Archaeological Advisory Service
- Environment Agency
- Statutory Undertakers
- Engagement with the Metropolitan Police Architectural Liaison Officer to ensure that the Proposed Development incorporates crime prevention principles;

Further detail of how both the technical assessments and Proposed Development itself have been shaped by this proactive approach to pre-application engagement are referenced as appropriate in the Hybrid Outline Application submission documents.

# 5 **Proposed Development**

This section of the Planning Statement describes the Proposed Development and its key design elements and principles. This should be read alongside the submitted Planning Development Specification (EBR-02) which lists those elements of the Masterplan that are being proposed as fixes rather than illustrative.

In summary, this Hybrid Outline Application is for:

- A mixed use development in outline for residential floorspace and ancillary residential facilities (Class C3) non-residential floorspace comprising flexible retail (Classes A1 A4), community (Class D1), leisure (Class D2) and workspace (Class B1) floorspace; provision of basement; new pedestrian and vehicular access; and associated amenity space, open space, plant, landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works; and
- Detailed planning consent for Blocks 7 and 8 comprising residential floorspace and ancillary residential facilities (Class C3); provision of a basement; new pedestrian and vehicular access; and associated amenity space landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works.

As part of this proposal the Outline Area development quantum would comprise up to 36,610sqm residential floorspace (equating to an illustrative 532 residential units); and up to 3,018sqm non-residential floorspace set around three public squares. It is being submitted with all matters reserved. This approach has been adopted to establish the principle and character of the wider site's redevelopment – whilst allowing the necessary flexibility for blocks to be designed and constructed in the future with due consideration to changing context.

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

The Hybrid Outline Application is therefore structured around the design proposals for two distinct areas across the estate (the Outline Area and the Detailed Area) which, separately, present different levels of design detail for approval and combined, form the Ebury Bridge Masterplan

With the above in mind, there are strategic design strategies proposed at a Masterplan level that will allow the Proposed Development to function as a single cohesive neighbourhood - comprising a total of 9 mixed-use residential-led blocks, four new landscaped public squares and an illustrative total provision of 758 residential units. The relationship between the design strategies for the Outline Area, Detailed Area and Site-wide Masterplan are thusly explored in more detail below where appropriate.

# 5.1 **Demolition**

In order for the Ebury Bridge Renewal to fulfil its goals of creating a high quality, inclusive environment for residents and visitors alike, all 13 residential blocks, ancillary plant rooms and garages blocks across the estate are required to be demolished.

In this regard, it should be noted that Edgson House has already been demolished under Full Application Ref: 18/08372/COFUL to facilitate the creation of a new community-focused Meanwhile project. Similarly, the demolition of Wellesley House, Wainwright House, Dalton House, Hillersdon House, Pimlico House and Mercer House were approved under Prior Approval Application Ref: 19/06951/APAD.

The remaining buildings across the estate with no secured mechanism for demolition are Bucknill House, Victoria House, Rye House, Westbourne House, Bridge House and Doneraile House. The demolition of these blocks is therefore included as part of this Hybrid Outline Application.

The intention is to demolish these six blocks on a phased basis as required to allow for the seamless progression of the Proposed Development with the ongoing decant of existing residents into new homes. The Design and Access Statement and the Demolition Plan (Drawing Ref: EBE-AST-XX-DR-A-010014) submitted as part of this application illustrate the locations of these six outstanding blocks and associated outbuildings required for demolition as part of the proposal.

# 5.2 **Outline Area Proposal**

The standalone parameter plans and Architectural and Landscape Design Code that are contained in Chapters 4 and 5 of the Design and Access Statement respectively, establish the key parameters and principles of the Outline Area of the Proposed Development. This ensures that a development founded on an established and agreed upon design quality can be achieved, albeit with embedded flexibility to allow for local and wider constraints as required. The key design elements and principles of the outline scheme are set out below.

The Detailed Area of the proposal will include Blocks 7 and 8 along the eastern side of the Site alongside a new public square. Expected to come forward for development as the first phase, the Outline Area has been designed to enable any forthcoming Reserved Matters Applications to "slot in" around the Detailed Area.

### 5.2.1 Design Rationale and Layout

As set out in more detail in Chapter 3 of the Design and Access Statement, the proposal is underpinned by the following four design principles:

• Scale and Massing: The massing will be as such to accommodate an appropriate increase in new homes and non-residential floorspace across the Site. Alongside this, the buildings themselves by virtue of their articulation and scale will demonstrate a coherent relationship with the surrounding

buildings, sky line and urban grain. In this respect, impacts on surrounding uses and views was a key consideration informing the design' evolution.

- Public Squares and Gateways: The current design of the estate is insular in its layout, typified by illegible access points that lack natural surveillance. As a result, the existing outdoor spaces are under used. The connected open spaces proposed throughout the development however will have distinct identities and functions creating a pedestrian-only "spine" where residents and visitors can gather, play and interact. This spine will connect seamlessly to the open spaces surrounding the Site the forthcoming Chelsea Barracks Scheme to the south west and the existing Grosvenor Waterside to the south which, in turn connects to the River Thames.
- Active Frontages: The provision of active ground floor retail and commercial premises alongside duplex homes will ensure passive surveillance and natural looking is maximised whilst also contributing to "on-street vitality". This will facilitate the creation of a safe and secure public realm open for all to enjoy.
- A Great Place to Live: The provision of homes which are of the highest quality of design has been fundamental to the evolution of the Masterplan. The homes are bright, spacious, well laid out and well insulated from the outside environment. This will ensure a high level of internal comfort and cheaper running costs for residents.

With the above in mind, the development plots for Blocks 1 - 4 are aligned along the western border of the site, fronting onto Ebury Bridge Road and providing an active frontage. Conversely, the development plots for Blocks 5, 6 and 9 are staggered along the eastern boundary adjacent to the railway. Reflective of the orientation and positioning of Blocks 7 and 8 included within the Detailed Area, these taller blocks are narrow in profile when viewed from beyond the estate which, whilst reflecting the orientation of the surrounding street networks, also allow sunlight and daylight to permeate deep into the development.

All blocks together across the Masterplan frame four new public squares at ground level that are physically and visually linked to both each other and to the public realm beyond the estate. This creates a green spine throughout the development that, whilst secluded in its setting, is still accessible and open to all.

Final building envelopes; massing, and articulation; access; and appearance and materiality across the Outline Area will be informed by the Design Code Chapters of the Design and Access Statement, and will crystallise as part of future Reserved Matters submissions.

### 5.2.2 Land Use Quantum

### 5.2.2.1 Residential Provision

As illustrated on the Land Use Parameter Plan Refs: 1210 - 1215, the residential provision proposed across the Outline Area will be contained within the development plots for Blocks 1 - 6, and Block 9. The total outline residential quantum would comprise a maximum of 36,610sqm gross internal area ('GIA') of

residential unit floorspace which, with the current illustrative unit and tenure mix set out in Table 2(a), (both in unit numbers [u] and in habitable rooms [hr]) equates to 532 homes. When read alongside the Detailed Area (which comprises 16,589sqm GIA of residential unit floorspace) the total maximum residential unit provision across the Masterplan will be 53,199sqm. This compares to the 20,366sqm of residential floorspace across the estate as existing.

As above, whilst the intention with this application is to fix the 36,610sqm of residential unit floorspace for the Outline Area as a maximum, the final dwelling mix for each residential block will only crystallise with future submissions of Reserved Matters Applications. In this instant therefore, the dwelling mix for the Outline Area is illustrative and has been devised in consideration with current borough and London-wide housing needs, as well as the overarching policy objective of optimising housing delivery.

For completeness, Table 2(b) sets out the final unit and habitable room mix proposed within the Detailed Area which comprises Blocks 7 and 8; and Table 2(c) sets out the resulting cumulative Masterplan provision (the Outline Area and Detailed Area combined).

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
Social Rent	27u	71u	58u	11u	3u	170u
	(54hr)	(213hr)	(232hr)	(55hr)	(18hr)	(572hr)
Intermediate	18u	12u	12u	0u	0u	42u
	(36hr)	(36hr)	(48hr)	(0hr)	(0hr)	(120hr)
Private	157u	152u	11u	0u	0u	320u
	(314hr)	(456hr)	(44hr)	(0hr)	(0hr)	(814hr)
TOTAL	202u	235u	81u	11u	3u	532u
	(404hr)	(705hr)	(324hr)	(55hr)	(18hr)	(1,506 hr)

Table 2(a): Illustrative housing size and tenure mix across Outline Area

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
Social Rent	27u	60u	36u	6u	1u	130u
	(54hr)	(180hr)	(144hr)	(30hr)	(6hr)	(414hr)
Intermediate	24u	17u	3u	0u	0u	44u
	(48hr)	(51hr)	(12hr)	(0hr)	(0hr)	(111hr)
Private	17u	23u	12u	0u	0u	52u
	(34hr)	(69hr)	(48hr)	(0hr)	(0hr)	(151hr)
TOTAL	68u	100u	51u	6u	1u	226u
	(136hr)	(300hr)	(204hr)	(30hr)	(6hr)	(676hr)

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL	% Split by hr
Social Rent	54u (108hr)	131u (393hr)	94u (376hr)	17u (85hr)	4u (24hr)	300u (986hr)	5(0/
Intermediate	42u (84hr)	29u (87hr)	15u (60hr)	0u (0hr)	0u (0hr)	86u (231hr)	56%
Private	174u (348hr)	175u (525hr)	23u (92hr)	0u (0hr)	0u (0hr)	372u (965hr)	44%
TOTAL	270u (540hr)	335u (1,005hr)	132u (528hr)	17u (85hr)	4u (24hr)	758u (2,182hr)	100%

	~				
Table 2(c)	Cumulative	housing si	ze and tenur	e miy acro	ss Masterplan
1 abic $2(c)$ .	Cumulative	nousing si	ze and tenui	c mix aci u	ss master plan

As illustrated above, an indicative total of 758 units (2,182 habitable rooms) are proposed across the Ebury Bridge Estate Masterplan as a mix of standard and duplex apartments. Of this, 226 (676 habitable rooms) are being applied for in detail and an indicative 532 (1,506 habitable rooms) is included within the Outline Area.

Of this illustrative 758 units,300 could be Social Rent of which, 115 could comprise 3 or more bedrooms. On this basis, 38% of the Social Rent provision could comprise family units.

On a habitable room basis, the illustrative mix facilitates a total affordable housing provision across the Masterplan of 56% where a total of 1,217 habitable rooms will be of an affordable tenure. Of this, 986 habitable rooms (81%) can be provided as Social Rent and 231 habitable rooms (19%) can be provided as an Intermediate tenure product.

As set out above, pre-demolition of Edgson House there were 336 residential units across the Ebury Bridge Estate, which comprised 198 units (548 habitable rooms) in Social Rent and 138 units (411 habitable rooms) held privately under long leaseholds. It is now proposed to demolish these units and replace them with the illustrative 758 residential units and tenure mixes set out in Table 2(c). This will result in a Masterplan net gain of 422 residential across blended tenures. Table 3 below sets out the net gains in affordable tenures.

Unit Status	Tenure	No. Units	% Split by hr
Existing Units to be	Social Rent	198u	
Demolished		(548hr)	
	Intermediate	0u	
		(0hr)	-
	Private	138u	
		(411hr)	
Proposed Units	Social Rent	300u	56%
		(986hr)	
	Intermediate	86u	
	(rent/ownership)	(231hr)	

**Table 3: Affordable Provision Net Gain** 

	Private	372u (965hr)	44%
Net Gain	Social Rent	102u (438hr)	55%
	Intermediate (rent/ownership)	86u (231hr)	
	Private (sale/rent)	234u (554hr)	45%
TOTAL new-build flats (replaced + uplift)		758u (2,182hr)	
Affordable Total		386u (1,217hr)	_
Affordable Net Gain		188u (438hr)	

As set out above in Table 3, of the net gain of 422 residential units (1,223 habitable rooms) indicatively proposed across the Masterplan, 188 residential units (669 habitable rooms) are proposed as affordable comprising a blend of social rent and intermediate products. This equates to 55% of the net gain comprising an affordable tenure.

### 5.2.2.2 Non-Residential Uses

Across the existing Ebury Bridge Estate, there is a total of 846sqm of A Class Use retail floorspace spread across the ground floor of Rye House and Bucknill House fronting onto Ebury Bridge Road. This is broken up into 14 individual retail units.

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.

Full Application Ref. 18/08372/COFUL approved the demolition of Edgson House - with subsequent Full Application Ref. 19/05038/COFUL granted on the 17th September 2019 for the redevelopment of the former Edgson House site to a new Meanwhile facility which will comprise a café, interim work spaces and a new community facility of 79sqm. The intention will be for this facility to serve as a new community hub for a temporary period of 5 years, becoming a focal point as the Proposed Development progresses.

Notwithstanding the meanwhile facility, the intention is to replace all existing non-residential land uses across the estate with up to 3,018sqm of non-residential floorspace spread across the Outline Area. The distribution of this floorspace across basement, ground and first floor levels is illustrated in the Land Use Parameter Plans. On the ground floor level, all the non-residential units are located on the perimeter of the Development Plots to ensure active frontages are maximised. This is the case specifically on Ebury Bridge Road where a continuous length of non-residential uses are proposed, wrapping round into the Proposed Development itself. This will provide inviting active gateways from Ebury Bridge Road whilst also maintaining the retail function of the designated Ebury Local Centre.

The maximum 3,018sqm non-residential quantum proposed is to be distributed across specific development plots. Whilst the exact nature and final split of this

provision will crystallise with future Reserved Matters Applications, Table 4 below sets out the thresholds and caps of each specific Use Class. This will ensure maximum flexibility across the scheme whilst still enabling aspirations for a truly mixed-use neighbourhood to be met.

Block	Uses GIA			
B1, B2, B3, B4	1,600 sqm Class A1 - A4 / D1 where:			
	-A3 no more than 460 sqm			
	-A4 no more than 340 sqm			
	-D1 no more than 150 sqm			
B5	350 sqm Class B1			
	158 sqm Class D1			
B9	910 sqm Class D1 / D2 / A3 where:			
	- A3 no more than 130 sqm			

**Table 4: Non-Residential Uses Proposed** 

The 158sqm community provision in Block 5 will take the form of a designated community hall. The hall will be of a substantially improved quality and slightly larger than the previous community provision it replaces in Edgson House. Situated on the ground floor with open facades along a main pedestrian route, this new provision will provide an open plan flexible space for dedicated community meetings and events. Alongside the community provision, Block 5 will also include 350sqm of B1 Class Use. This will be operated as flexible floorspace to accommodate offices or more informal work spaces for smaller businesses and startups.

As noted in Table 4, Blocks 1-4 and Block 9 all have the potential to accommodate additional community spaces. In this respect, previous consultations which took place prior to this Hybrid Outline Application submission and in the lead up to the submission of the Full Application Ref: 18/08372/COFUL for the demolition of Edgson House, gave residents the opportunity to provide feedback on the types of community spaces they would like to see across Estate. Particular note was made of demand for a community nursery for Early Years Childcare, a Community Health and Wellbeing Space, and a Community Café. Locations within the illustrative Masterplan where these uses can be accommodated have already been provisionally identified. As above however, the final functions of the non-residential floorspace will crystallise with forthcoming Reserved Matters Applications and their respective pre-submission consultations.

In addition to the above, whilst considered a use ancillary to the residential function (hence not highlighted in Table 4), the Management Hub located in Block 7 also serves a dual function. Alongside its primary purpose as a centre for the governance and management of the new estate, it will play a key role in the hosting of resident-led community initiatives. Residents will have access to its boardroom, allowing for the hosting of community events, presentations and workshops such as skills training.

### 5.2.3 Height and Massing

The Maximum Building Heights Parameter Plan Ref: 011216 illustrates the maximum building heights proposed across the Outline Area. As set out in the Design and Access Statement and incorporated Architectural Design Code in Chapter 4, the heights have been devised to ensure that housing capacity can still be optimised whilst allowing for blocks to come forward in a way that is respectful of their context and surrounding streetscape – particularly from a sunlight and daylight perspective.

To this end, the buildings across the Masterplan have been conceived as two distinct typologies: Blocks 1 - 4 as lower wider buildings along the western edge of the Site; and Blocks 5 - 9 as taller narrower elements along the eastern edge (whereby Blocks 7 and 8 are included within the Detailed Area and therefore set out in more detail in the next section).

The Development Plots for Blocks 1 - 4 are identically sized in footprint and maximum height, all comprising two main shoulder heights with the first shoulder accommodating communal private gardens on the roofs. Further height capacity is proposed towards each buildings' core to allow for any plant. Blocks 1 and 4 however incorporate additional, smaller set back shoulder heights at their flanks (a total of three shoulders in all) in response to the sunlight and daylight interests of the adjacent 1 Ebury Bridge and Cheylesmore House.

Conversely, the Development Plots for Blocks 5 - 9 are narrower in footprint and orientated at an angle against the eastern edge. This is ensures their visual impacts are mitigated when viewed from beyond the Site whilst also allowing sunlight and daylight to permeate deep into the site. Whilst the Development Plot parameters for Blocks 5 - 9 are similar, they do vary in terms of height and massing. This is in response to both planning policy, and to the baseline assessments relating to impacts on sunlight, daylight and townscape views. Each block comprises a podium level featuring communal private gardens and above that, three subsequent shoulder heights. Further height capacity is proposed towards each buildings' core to allow for any plant.

The maximum heights (with illustrative respective storeys) of the shoulders of the outline blocks described above are set out in Table 5.

	Communal Private Garden	Shoulder 1 Height in AOD	Shoulder 2 Height in AOD	Shoulder 3 Height in AOD	Additional Height at Core	
Blocks 1			28.95m	31.35m	1.31m	
and 4	25	5.50m	(circa 7 storeys)	(circa 8 storeys)	1.51111	
Blocks 2	(circa	6 storeys)	31.35m	N/a	1.01m	
and 3			(circa 8 storeys)	IN/a		
		28.65m	54.20m	57.70m		
Block 5	8.25m	(circa 7	(circa 15	(circa 16		
		storeys)	storeys)	storeys)		
		38.10m	63.65m	67.15m		
Block 6 Block 9	(circa 2 storeys)	(circa 10	(circa 18	(circa 19	1.2m	
		storeys)	storeys)	storeys)		
		47.55m	54.20m	57.70m		
		(circa 13	(circa 15	(circa 16		
		storeys)	storeys)	storeys)		

#### **Table 5: Maximum Proposed Block Heights**

As illustrated in Table 5, Block 6 will be the tallest structure across the Site, dropping down to Block 5 to the north and to Block 9 to the south. Blocks 7 and 8 are included within the Detailed Area of the Masterplan and are in keeping with this rationale.

In terms of basement, as illustrated on Parameter Plan Ref: 011205 three primary basement provisions are proposed across the Ebury Bridge Masterplan: A single basement beneath Blocks 2 and 3; a larger single basement beneath Blocks 6, 7 and 8 (the element beneath Block 6 is being secured in outline as part of the Outline Area); and a further standalone basement space beneath Block 9. Alongside these larger basements, two smaller subterranean spaces are proposed beneath Blocks 1 and 4 for use as isolated plant space.

# 5.2.4 **Open Space and Landscaping**

The development plots across the Ebury Bridge Estate Masterplan have been shaped and configured to delineate the creation of a spacious and well lit "green spine" that traverses north-south through the Proposed Development in the form of four connected public squares. This spine is entered primarily from the "northern gateway" – a wide, heavily landscaped stepped access point from Ebury Bridge. Further tree-lined and landscaped pedestrian access points are proposed connecting each of the main squares west onto Ebury Bridge Road. A "southern gateway" then links to the Grosvenor Waterside to the south of the Site.

One of the squares and Ebury Bridge Road access points is included as part of the Detailed Area so will be discussed in more detail in the next section of this Planning Statement. The three remaining squares and accesses however are included within the Outline Area so, whilst the final designs of these spaces will crystallise with subsequent Reserved Matters Applications, the key principles of their layouts are established in the Landscape Design Code in Chapter 5 of the Design and Access Statement.

One of the more fundamental design principles behind the landscaping is that each space serves a purpose, with a defined identity and experience for both residents

and visitors alike. This will not only ensure excitement and legibility for users but, through its heterogeneous landscaping, will also maximise the estate's ecological and biodiversity benefits.

The illustrative landscaping layout, as derived from the Landscape chapter of the Design and Access Statement, is included in Figure 4 below and should be read alongside the Landscape Design Code, and Parameter Plan Refs 011150 and 011160-62 which confirm the distribution of the public and private open space across the Site alongside the key access and circulation routes.

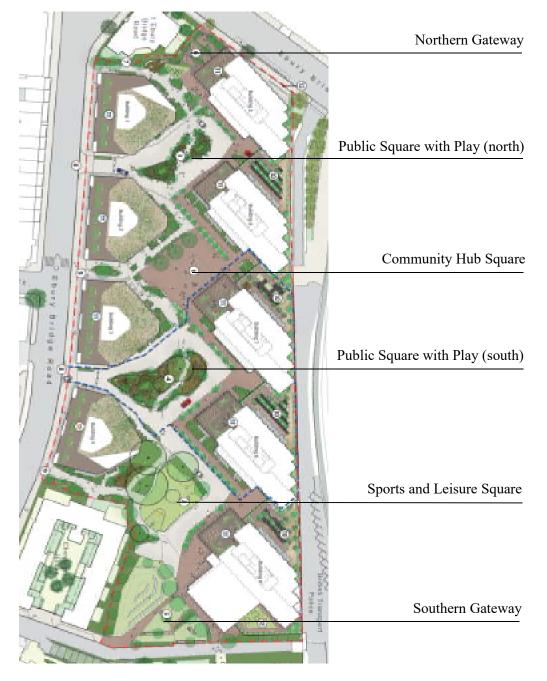


Figure 4: Illustrative Masterplan Landscaping

With the location of each public square and gateway illustrated in Figure 4 above, the role and function of each included in the Outline Area is set out below in more detail

- Public Square with Play (north) and Northern Gateway: As the northernmost open space, this links directly to the northern gateway. Fronting onto non-residential uses within Block 5, the public realm in this area will be designed to accommodate spill out, whilst also incorporating overlooked playspace to its centre. As will be explored in more detail in the next section, of the four squares proposed this square is also one of only two which will allow vehicles to enter and carry out a complete circulation of the central space. The surface materials will therefore be designed to demarcate areas for vehicles whilst ensuring pedestrian and cycle circulation spaces are prioritized.
- Community Hub Square: This square is not intended to have any vehicle access, as it is indended to serve as the largest vehicle-free open space across the Masterplan. Accordingly, its final landscaping, configuration and hard materials would be designed to encourage both intimate social interaction between neighbours and larger communal events for the wider neighbourhood.
- Public Square with Play (south). This square, as with the northern public square with play, allows vehicles to enter and carry out a full rotation. From here, vehicular access can also be gained to the Sports and Leisure Square to the south. Play space is located within the square's central area. This square, along with its associated access from Ebury Bridge Road is included as part of the Detailed Area so is covered further below in section 5.3.5.
- Sports and Leisure Square and Southern Gateway: Located to the very south of the estate, the primary function of this square is defined by the flexible multi-use games area (MUGA) at its centre, which will allow for informal ball games and play. Vehicles have access to the eastern edge of the square only in order to service Block 9 with the surrounding landscaping to respond accordingly in a way that delineates pedestrian and cyclist priority. This square, being adjacent to Block 9 and its ground floor non-residential uses, will also be programmed to accommodate potential spill out. The new space will then transition through the "southern gateway) to visually link to the adjacent existing green spaces in Grosvenor Waterside.

In terms of children's playspace, the Play Strategy has been devised at a Masterplan level rather than isolated to specific blocks. With this in mind, the landscape chapter of the submitted Design and Access Statement illustrates the proposed play provision and distribution per age group across the Masterplan's entirety. As set out in that chapter, the provision of play for 0-4 year olds would be distributed evenly across the Masterplan, included on the residential podiums along the eastern edge of the Site; provisions located in the northern gateway and Sports and Leisure Square to the south; and with a further cohesive network of more informal playable landscape features throughout.

Play space for 5-11 year olds would be located within the northern gateway adjacent to the proposed 0-4 year old provision; and also within the Public Squares with Play (north and south). This will ensure every block is within suitable reach of such provisions. The flexible MUGA in the Sports and Leisure Square will provide the primary 12+ years play provision, being available to informal ball games and sporting events.

In quantum terms, Table 5 below sets out the total playspace proposed across the Masterplan per age group – and of that, which relates to Blocks 7 and 8.

Play Space Type	Proposed Provision	Of which for B7 & B8
0-4 years	1,721sqm	324sqm
5-11 years	730sqm	485sqm
12+ years	403sqm	0
Total playable area	2,854sqm	809sqm

 Table 5: Playspace Quantum proposed across the Masterplan

In terms of trees, taking the baseline after Edgson House was demolished (pursuant to Full Application Ref: 18/08372/COFUL) and the Meanwhile uses constructed (pursuant to Full Application Ref: 19/05038), there are a total of 32 trees within the Hybrid Outline Application's red line (which includes individually those trees that are otherwise part of groups). As set out in more detail as part of the submitted Arboricultural Report and Tree Survey (Ref. EBR-10), this comprises 1 Category A tree; 20 Category B trees and 11 Category C trees. These trees are scattered unevenly across the estate with no defined hierarchy or pattern. In order for the site to accommodate the Masterplan proposed, a total of 26 trees are required for removal with 6 proposed for retention. In addition to this, a further Category B tree (T39) beyond the application site to the north east is also required for removal due to its location immediately adjacent to one of the proposed development plots.

As set out in the landscaping chapter of the Design and Access Statement, the landscaping proposed includes a comprehensive Masterplan tree planting strategy. Trees will be utilised to offer legibility to routes in and out of the estate; to provide focal points and landmarks; to offer shading in areas of open space; and to provide general visual and ecological amenity value. These trees will be complimented by areas of planting and low lying shrubs to define routes and public squares. In all, it is envisaged that an illustrative total of 229 trees will be planted across the Masterplan – 235 including the 6 retained trees.

#### 5.2.5 Transport and Access

Access and Circulation Parameter Plan Ref: 011221 defines the circulation routes across the entirety of the Ebury Bridge Estate Masterplan. Whilst the provision of

vehicle access is a necessity to allow for deliveries, servicing and a convenient and useable disabled parking provision, the circulation has been designed primarily to prioritise cyclists and pedestrians. Cohesive and legible routes are intended to web throughout the Proposed Development, allowing for complete transparency and full usability of all public spaces provided. The Design Code Chapters within the Design and Access Statement provides more information on the design principles which will inform these routes as they crystallise through forthcoming Reserved Matters Applications.

In terms of car parking, given the Site's location the proposal is intended to be car free – albeit with a 5.5% provision for disabled residents only which will be provided from the outset. With the indicative provision of 758 units across the Masterplan, this equates to a total of 42 spaces. This parking, along with spaces for motor cycles, will be located at ground level within the secure podiums towards the rear of the Site though accessible to any resident who requires access. 50% of the car spaces will be equipped with active electric vehicle charging points and all remaining spaces will be equipped with a passive provision. Alongside the private resident parking bays, two standard car club spaces will also be provided. These will be located on-street for ease of use by residents.

In terms of cycle parking provision for the Outline Area – that for the residential element will be determined on a phase by phase basis in accordance with the prevailing development plan policy at the time. As current therefore and in line with the Draft LP, the indicative Outline Area unit mix generates a minimum requirement for 951 long-stay resident cycle spaces which will be located in secure stores (a total of 1,370 cycle spaces across the Masterplan when considered alongside Blocks 7 and 8 in the Detailed Area). Alongside this, a further 31 spaces are to be provided at street level for use by visitors.

For the non-residential element, the maximum floorspace quantums proposed will generate a demand across the Masterplan for 132 cycle spaces. Of this, 101 will comprise short-stay spaces provided as Sheffield Stands which will be suitably located in accessible positions within the public realm. The remaining 31 spaces will be long stay for use by staff. It is envisaged these will be provided within the demises of the respective retail units as and when they are fitted out.

As set out above, immediately adjacent to the Site to the north is a TfL Cycle Hire Docking Station comprising 26 spaces. Following an extensive consultation with TfL, in light of the residential uplift proposed as part of the Proposed Development is proposed that a additional Docking Station capacity will be provided adjacent to the existing provision. Open for use by both residents and visitors alike, this new station will have capacity for a further 12 cycle spaces.

### 5.2.6 Energy and Sustainability

Details of how the Outline Area of the Ebury Bridge Estate Masterplan has been devised with sustainability and user comfort at its forefront both during construction and operation are set out in the submitted Energy and Sustainability Statement (Ref. EBR-09). This includes measures that will be incorporated into the design, construction and operational management of the buildings across the Site with a view to minimising resource wastage utilising renewable energy sources where practicable, and ensuring operational costs for residents is reduced.

In this respect, two energy centres are proposed across the Masterplan (in Blocks 6 and 7) which are envisaged to each serve half the Site, becoming operational commensurate with phasing. These centres, comprising all the primary mechanical equipment to facilitate the Site's heating and cooling strategy, will encompass an open loop ground source heat pump at basement level alongside a two stage air source heat pump at roof level.

The preference currently is for the ground source heat pump to provide the majority of the development's hot and chilled water demands with the air source pumps only providing residual need. Test wells are however currently being reviewed to assess the capacity of this. If primary reliance on ground source is not possible, then the air source system will meet the entire heating and cooling load. As above, this strategy is set out in more detail in the Energy and Sustainability Statement with the design of the proposal itself allowing sufficient flex for each of these energy centre methods.

# 5.3 Detailed Consent for Blocks 7 and 8

Within the Detailed area, detailed planning permission is sought for Blocks 7 and 8 which comprise 226 residential units; ancillary residential facilities (Class C3) and basement; new pedestrian and vehicular access; associated amenity space landscaping; car and cycle parking; refuse storage; servicing areas; and other associated infrastructure works.

Whilst the Detailed Area is not otherwise governed by the parameter plans that underpin the Outline Area, there are overarching design strategies proposed across the Masterplan as a whole. This will ensure the entirety of the Proposed Development can operate as a seamless and cohesive neighbourhood. Accordingly and as set out below, the design rationales for Blocks 7 and 8 within the Detailed Area have been formulated to be fully compatible with the Masterplan strategies

The need for Blocks 7 and 8 to be secured in detail as part of this Hybrid Outline Consent is to expedite the rehousing of estate residents – ensuring as minimal disruption as possible. As such, whilst to be fully compatible with the Outline Area, the Detailed Area must also be able to operate as an independent element until the wider development is delivered in accordance with the wider Masterplan principles.

The blocks and landscaping comprising the Detailed Area will be located on land formerly occupied by Wellesley House, Wainwright House, Dalton House and Hillersdon House. These buildings were all approved for demolition on 10/10/2019 as part of Application Ref: 19/06951/APAD. At the time of writing, demolition of these blocks had already started. Further design information on the Detailed Area as proposed is set out below.

### 5.3.1 Layout

Blocks 7 and 8 are located on the eastern edge of the Site adjacent to the railway. Whilst two distinct buildings, they are connected at first floor level by a podium which, on top contains communal amenity space for residents and, beneath on the ground floor, the car and motorcycling parking provision. This ensures that the buildings provide a cohesive sense of enclosure along the eastern edge, providing a public realm buffer from the railway.

As noted above, whilst it is proposed that Blocks 7 and 8 are integrated into the Ebury Bridge Masterplan, these blocks will be constructed first so it will be essential that they can also be constructed and operate independently. Accordingly, as part of the Detailed Area consent is also being sought for one of the four main squares (Public Square with Play [South]) across the Site. By virtue of the staggered footprints of Blocks 7 and 8, a continuous frontage is presented onto this square.

The square itself contains a central element of planting, trees and playspace with sufficient space surrounding to allow vehicles to traverse and exit. Planters and further landscaping define the more semi-private outdoor areas, with the entrances to the Block 7 and 8 residential lobbies, refuse stores and cycle stores set back behind.

### 5.3.2 Land Use Quantum

There are two main land uses proposed within Blocks 7 and 8 – the primary residential units; and the habitable and non habitable ancillary residential spaces which includes the Management Hub. More details on these two uses are provided below.

### 5.3.2.1 Residential

Both Blocks 7 and 8 are buildings comprising single cores. Each contains a mix of tenures and unit sizes distributed throughout to ensure a maximum variety of unit types and unit choices – both for residents opting to remain on the estate and for new residents moving in.

Block 7 contains 112 dwellings over 18 storeys and Block 8 contains 114 dwellings over 17 storeys. The dwelling, tenure and habitable room mix of these blocks are set out in Tables 6 and 7 respectively, with the combined mix across the Detailed Area set out in Table 8.

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
Social Rent	11u	22u	15u	2u	0u	50u
	(22hr)	(66hr)	(60hr)	(10hr)	(0hr)	(158hr)
Intermediate	10u	11u	3u	0u	0u	24u
	(20hr)	(33hr)	(12hr)	(0hr)	(0hr)	(65hr)

Table 6:	Block	7 Dwelling	and Tenure	Mix
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Private	14u	16u	8u	0u	0u	38u
	(28hr)	(48hr)	(32hr)	(0hr)	(0hr)	(108hr)
TOTAL	35u	49u	26u	2u	0u	112u
	(70hr)	(147hr)	(104hr)	(10hr)	(0hr)	(331hr)

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
Social Rent	16u	38u	21u	4u	1u	80u
	(32hr)	(114hr)	(84hr)	(20hr)	(6hr)	(256hr)
Intermediate	14u	6u	0u	0u	0u	20u
	(28hr)	(18hr)	(0hr)	(0hr)	(0hr)	(46hr)
Private	3u	7u	4u	0u	0u	14u
	(6hr)	(21hr)	(16hr)	(0hr)	(0hr)	(43hr)
TOTAL	33u	51u	25u	4u	1u	114u
	(66hr)	(153hr)	(100hr)	(20hr)	(6hr)	(345hr)

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
Social Rent	27u	60u	36u	6u	1u	130u
	(54hr)	(180hr)	(144hr)	(30hr)	(6hr)	(414hr)
Intermediate	24u	17u	3u	0u	0u	44u
	(48hr)	(51hr)	(12hr)	(0hr)	(0hr)	(111hr)
Private	17u	23u	12u	0u	0u	52u
	(34hr)	(69hr)	(48hr)	(0hr)	(0hr)	(151hr)
TOTAL	68u	100u	51u	6u	1u	226u
	(136hr)	(300hr)	(204hr)	(30hr)	(6hr)	(676hr)

In terms of tenure, as illustrated above, Blocks 7 and 8 will comprise a total of 676 habitable rooms. Of this, 525 habitable rooms will be affordable, which equates to a 78% split. Of the affordable provision, 414 habitable rooms will be social rent and 111 habitable rooms will be provided as an intermediate tenure product. This equates to a split of 79% social rent and 21% intermediate.

# 5.3.2.2 Residential Ancillary Space

Non-habitable residential ancillary facilities include the cycle stores, plant rooms and car parks for the residential element. The primary habitable residential ancillary use however will be the Management Hub, to be contained within Block 7. Located across much of the ground floor of the block's northern frontage, the hub will accommodate the main estate management office whilst serving as the principal facility across the estate for parcels, deliveries and servicing. Alongside this function however, the premises will also provide meeting spaces and board rooms to allow supporting essential services and liaison for residents. It will therefore be important for this facility to be live for use as soon as Blocks 7 and 8 become occupied. As such, the extents of the Detailed Area have been devised to ensure that access to the Management Hub can be obtained safely – and that the hub can operate unhindered by any ongoing demolition and construction works taking place beyond the Detailed Area demise.

# 5.3.3 Materiality and Design

In order to provide visual interest to Blocks 7 and 8, articulation, materials and colours have been used sensitively with a view to breaking up the massing and reinforcing the human scale of the proposal.

As set out in more detail in the Design and Access Statement, the frontages have been split into distinct façade zones, whereby each displays a different yet complimentary vernacular which draws the eye of users across and through the Proposed Development. These vernaculars are to provide visual variety to the Masterplan whilst also complimenting and responding to the varied townscape beyond the Site itself.

The sensitive approach to design has been similarly carried through internally. The cores and corridors have been configured for ease of access and escape in case of emergencies and the residential units are spacious, well laid out, contain sufficient storage provision, and are comfortable for residents.

# 5.3.4 Height and Massing

As set out above, the Ebury Bridge Estate Masterplan is generally to be comprised of two key building typologies – the smaller wider blocks (Blocks 1-4) to the west adjacent to Ebury Bridge Road and the taller more slender blocks (Blocks 5-9) to the eastern edge adjacent to the railway.

Across the five slender blocks, the height rationale is for Block 6 to be the tallest. Heights will thusly step down to Block 5 to the north, and to Blocks 7, 8 and 9 to the south. As set out in Table 5, these blocks each contain a podium level garden, 3 separate shoulder heights and an additional flexible height capacity towards the building core's for plant. The respective heights of Blocks 7 and 8 are thusly set out below in Table 9. In line with the Masterplan design rationale, this illustrates the overall step down in height from Block 7 to Block 8.

	Podium Garden	Shoulder 1	Shoulder 2	Shoulder 3	Additional Height at Core
Block 7	8.25m	44.40m 12 storeys)	60.50m 17 storeys	64.00m 18 storeys	1.2m
Block 8	(2 storeys)	47.55m 13 storeys)	57.35m 16 storeys	60.85m 17 storeys	

# 5.3.5 **Open Space and Landscaping**

The majority of residential unit within Blocks 7 and 8 will be provided with their own private amenity space in the form of terraces for units on the ground floor and balconies for those units above. The ground floor terraces, whilst overlooking the adjacent public square, will be sufficiently set back behind rows of landscaping to provide defensible space and sufficient privacy for residents.

Of the total 226 units proposed, 191 will have access to their own respective provision of private outdoor amenity whilst a further 6 units, whilst not having external amenity, will be of a larger internal size. 29 units (13%) will not have these provisions however. These units are all located on the eastern edge adjacent to the railway where the Site boundary constrains the extents that larger balconies can project. However, these 29 units are provided with smaller Juliet balconies which, with a minimum depth of 0.5m still allows space for standing outside. The balconies are equipped with large format doors, ensuring that occupants in these units can still benefit from their positive impact on ventilation and sunlight and daylight. These residents will also have access to the communal private and publicly open spaces proposed, set out in more detail below.

In terms of outdoor communal amenity space, each block will have an associated communal private podium garden which will be landscaped and equipped with a combined total of 324sqm of playspace for children aged 0-4 years.

In addition to these, each block will have further access to their own communal private roof gardens. As set out in more detail in Chapter 8 of the Design and access Statement, these spaces are designed more for relaxation amenity and social interaction and will be provided with communal table elements and timber pergolas. These gardens, accessible for residents of each respective block only, will be located on the roofs of the blocks' first shoulder (above the 12<sup>th</sup> storey for Block 7 and above the 13<sup>th</sup> storey for Block 8).

In terms of the public open space provided as part of the Detailed Area, framed by Blocks 7 and 8 will be the inclusion of one of the four new public squares proposed across the Masterplan. Vehicular access to this square will be secured to its west corner, with the design as such to allow cars to carry out a full rotation around its perimeter. From this, the square will be designed to also allow vehicles to traverse southwards to provide access to Block 9 and its non-residential uses.

Beyond this however, the square design will otherwise be as such to prioritise pedestrians and cyclists. Paving styles and textures will demarcate different routes through and around the space and the landscaped areas will be shaped organically in the center, softening the space and reinforcing its primary role as a piece of public amenity. Integrated into the landscaping within the center of the square will be 485sqm playspace for children aged 4-10 years old. This will be accessible for use by children across the Masterplan.

### 5.3.6 Transport and Access

All pedestrian access into Blocks 7 and 8 would be secured from the main square, albeit set back behind landscaping and planters which allude to a more "semi-private" space.

In terms of cycle parking, individual stores will be provided on the ground floor and basement levels of Block 7 and Block 8, secured and accessible only to residents within the respective blocks. The Block 7 store will comprise spaces for 207 cycles and the Block 8 store will comprise spaces for 212 cycles. As part of this provision, 5% of spaces will be provided as Sheffield Stands for use by nonstandard larger cycles.

The combined provision of short stay parking for both residential and retail visitors across the Masterplan cumulates at 132 spaces, which will be provided at street level as Sheffield Stands. Whilst no non-residential floorspace is proposed as part of the Detailed Area, the rationale is to still provide an even distribution of short-stay spaces across the Masterplan itself. Accordingly, within the square included as part of the Detailed Area, 10 visitor cycle spaces will be provided.

As set out above, the disabled car parking provision will be provided for 5.5% of the residential dwellings proposed across the Masterplan. Whilst these spaces will be accessible to all residents who are "White Badge", the car parking itself would be confined beneath the podiums to the rear of the Site. One such podium will connect Block 7 and Block 8, and will contain a total of 16 disabled car parking spaces spread across three different parking areas. Of these, 50% will be equipped with active charging points and the remaining with passive connections. Alongside the car parking spaces within the podium, provision is also made for motorbikes.

It should be noted in this respect that, in addition to these 16 spaces, a further 2 are to be provided in the southern edge of Block 8 adjacent to its podium shared with Block 9. However, these spaces would not be accessible until Block 9 comes forward for construction.

# 5.3.7 Energy and Sustainability

Blocks 7 and 8 have been designed to incorporate measures that ensure the highest degree of sustainability. The details of these measures, included in more detail in the Sustainability and Energy Statement supporting this Hybrid Outline Application, are summarised below:

- Measures and devices will be installed in the proposed dwellings to achieve a maximum daily water usage of 105 litres, per person per day, with drought resistant planting prioritised within the landscaping to mitigate the need for external irrigation.
- Sustainable Urban Drainage Systems will be incorporated into the scheme, both across the roof gardens and podium and also within the public square. This will help to attenuate surface water whilst encouraging biodiversity.

- Facilities will be provided for residential, non-residential and construction related waste.
- In terms of accessibility, 90% of the new dwellings will be designed to meet Building Regulations Approved Document M4(2) and 10% will be "wheelchair units" designed as adaptable in accordance with Part M4(3).
- Sustainable transport modes will be encouraged with the provision of a sufficient quantum of cycle storage spaces for both residents and visitors, two car club spaces and electric car charging points for vehicles.
- Ecological enhancements will be implemented through the provision of areas of green roofs, bat boxes across the public realm, large communal private gardens, tree planting and surrounding landscaping at ground level. This will improve ecological resilience and to seek to achieve a biodiversity net gain for the Site.
- Recognising the Site's external noise sources, a high level of acoustic insultation has been incorporated into the design. In this respect, active cooling and mechanical ventilation will be installed within the blocks ensuring that residents do not have to rely on opening windows in order to keep cool. The windows are however openable as standard, if opening them is the user preference.
- In terms of construction practices, the site will be registered with the Considerate Constructors Scheme whereby measures to reduce construction site impacts and waste will be implemented.
- Passive strategies have been incorporated to reduce the demand for active heating and cooling, such as insulated and air-tight facades and balconies to provide local shading.
- Subject to capacity, primary heat generation will come from a ground source heat pump in the basement of Block 7, with the remaining requirement being met by an air source heat pumps on its roof. This mechanical equipment will go on to serve the heating and cooling requirements of half of the wider Masterplan.

# 6 Conformity of the Proposed Development with Planning Policy

This section of the Planning Statement summarises the Development Plan Documents, relevant planning designations and the material considerations that are relevant to the Proposed Development – before going on to assess the Proposed Development itself against these elements.

In this respect, given this Hybrid Outline Application comprises an Outline Area and a Detailed Area, where relevant each will be assessed separately and in pertinent levels of detail against Planning Policy. However, where specific design matters are being proposed as part of a wider Masterplan Strategy rather than isolated to within the Outline or Detailed Areas, then this will be assessed as required.

# 6.1 National Planning Policy and Guidance

The National Planning Policy Framework ('NPPF') was published February 2019 and superseded the 2012 and 2018 editions. Paragraphs 2 and 212 within the NPPF confirm that the NPPF itself must be taken into account as a material planning consideration in planning decisions.

To ensure that sustainable development is pursued in a positive way a presumption in favour of sustainable development is at the heart of the NPPF. This is explained in more detail in NPPF paragraph 11, which requires Local Planning Authorities to:

# *'c) approve development proposals that accord with an up-to-date development plan without delay;*

or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- *i. the application of policies in this Framework that protect areas of assets of particular importance provides a clear reason for refusing the development proposed; or*
- *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework when taken as a whole'.*

# 6.2 The Development Plan

In accordance with Part 3, Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), an application for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan comprises:

- The Current London Plan (2016) consolidated with alterations since 2011 ('Current LP')
- Westminster City Plan (2016) ('Current WCP')
- Westminster Unitary Development Plan (Policies Saved in 2010) ('UDP')
- The NPPF (referenced above) and emerging planning policy (set out below) are material considerations that ought to be afforded weight in the determination of the Hybrid Outline Application.

# 6.3 Draft Policy

Paragraph 48 in the NPPF notes that weight may be given to relevant planning policies in emerging plans pursuant to a) the stage of their preparation; b) the extent to which there are unresolved objections to such policies; and c) the degree of consistency of the relevant emerging policies to the NPPF itself. In this respect, set out below are the relevant emerging policy documents and, accordingly, the level of weight they should be assigned as material considerations

• Draft London Plan 2019 ('Draft LP')

This is intended to serve as a replacement to the Current LP and was published on 29<sup>th</sup> November 2017. In early 2019 it subsequently underwent an Examination in Public, with a Panel of Inspectors appointed by the Secretary of State issuing their report and recommendations to the Mayor on 8<sup>th</sup> October 2019. This culminated, in December 2019, with the Mayor issuing to the Secretary of State (SoS) his notice of his Intention to Publish the Draft LP as the new strategic document for Greater London.

On 13<sup>th</sup> March the SoS issued his feedback, noting that the Draft LP in its current state was inconsistent with national policy and missed opportunities to increase housing delivery. Accordingly, exercising powers under Section 337 of the GLA Act 1999, the SoS issued Directions required for inclusion into the Draft LP in order to make it consistent with national policy. At the time of writing, there was no confirmation that such amendments will be incorporated into the Draft LP. However, given their eminence from the SoS they are considered to be material considerations and will therefore be referenced in our citation of the relevant Draft LP Policies where required.

The Draft LP is considered to carry substantial weight due to its advanced stage of preparation. Accordingly and with the exception of those policies queried by the SoS (as per part b of NPPF paragraph 48), this Planning Statement assesses the relevant facets of the Proposed Development first and foremost for their compliance with the Draft LP. This is on the basis that, setting out "the direction of travel", the Draft LP serves as the primary document for London-wide planning policy. In this respect, reference will however still be made to the Current LP where relevant in so far as the Proposed Development should be in substantial accordance.

#### • Westminster City Plan 2019-2040 ('Draft WCP')

The City of Westminster's new City Plan is intended to serve as a new Local Plan, to supersede both the Current WCP and the UDP. It has undergone public consultation and was submitted to the Secretary of State on 19<sup>th</sup> November 2019. Accordingly, whilst the examination of the Local Plan by the Planning Inspectorate has commenced, as with the Draft LP, it has not yet been formally adopted. Given its advanced stage however, it is considered to be a material consideration reasonably capable of being afforded weight. As with the Draft LP therefore, this Planning Statement will assess the Proposed Development first and foremost for its compliance with the Draft WCP. The Current WCP and UDP will however still be referenced where relevant in so far as the Proposed Development should be in substantial accordance.

# 6.4 Site Designations and Allocations

Whilst the Current WCP forms part of the City's adopted Development Plan, given the advanced stage of adoption of the Draft WCP and its accompanying Policies Map (November 2019), it will be used first and foremost to assess the Site's designations and allocations.

The Site has the following designations and allocations:

- The Central Activities Zone (CAZ);
- The Ebury Key Development Site;
- Housing Renewal Area;
- The ground floors of Rye House and Bucknill House fronting onto Ebury Bridge Road are part of the Ebury Local Centre;
- An Archaeological Priority Area (Tier III);
- Crossrail 2 Safeguarding Zone across the north-western corner of the Site;
- Area of Play Space Deficiency and
- Flood Zone 3.

The Site is immediately adjacent to the following:

- The Victoria Opportunity Area to the Site's north;
- The Rising Sun public house and former garage adjacent to the junction of St Barnabas Street and Ebury Bridge Road are part of the Ebury Local Centre to the Site's west;
- Nos. 20 42 [even] Ebury Bridge Road are Grade II Listed Buildings to the Site's west;
- The Belgravia Conservation Area to the Site's west;

Within the context of the Development Proposal, the implications of each of these designations and how they have been considered is explored in more detail in the sections below.

# 6.5 **Development Principle**

The proposal concerns the regeneration of an existing Site with a view to establishing a new Masterplan. This Masterplan will provide high quality new units across all tenures; a much enhanced and better connected built environment; and the optimisation of existing land uses across the site. In this respect, NPPF paragraph 93 is relevant which highlights the "social, economic and environmental benefits" that such an estate regeneration proposal can deliver.

Building on this, the Draft LP Policy H8 specifically raises the opportunities that the redevelopment of existing housing estates can deliver – noting three aims:

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

Draft LP Policy H8, being focussed on the regeneration of affordable housing across existing estates, is explored in more detail in Section 6.6.2 of this Planning Statement below. However, in summary this policy welcomes interventions that enhance existing housing estates. The accompanying Mayor's Good Practice Guide to Estate Regeneration which, adopted in February 2018 to build on the guidance set out in the Estate Regeneration National Strategy (2016) and the Estate Regeneration National Strategy Good Practice Guidance (2016) supports this, citing such benefits as opening up access to a full range of better quality housing of all tenures; improvements across neighbourhoods; new opportunities for training and employment; and new community facilities. It notes however that there is no "one size fits all" approach to estate renewals. Rather, the level of intervention will depend on the specific constraints of the site in question. Therefore, when considering options to deliver estate regeneration projects, the potential benefits should also be weighed alongside the wider impacts.

In this respect, prior to demolition alternatives should be considered to assess if there are any less disruptive and more cost effective methods of estate enhancement that can still achieve the same vision and objectives. These alternatives should be explored in close consultation with existing residents and businesses to ensure they are at the heart of the estate's development.

The Site is located immediately adjacent to the Victoria Opportunity Area. In the Draft LP, the Victoria Opportunity area is noted as being capable of delivering 1,000 additional homes and 4,000 additional jobs over the plan period.

The more detailed design specifications for this area are carried through into Draft WCP Policy 4, which identifies priorities for the Victoria Opportunity Area such as increased growth, enhanced community facilities and an improved public realm. The redevelopment of the Ebury Bridge Estate, located immediately adjacent therefore, would act as a catalyst – spurring on further investment into and around the Opportunity Area. The inter-relationship between the Ebury Bridge Estate regeneration and the Victoria Opportunity Area is noted in the Draft WCP Chapter "Our Approach for Westminster" which states that the renewal of Ebury Bridge will create a "vitality that will resonate throughout the city."

The importance of redeveloping the Ebury Bridge Estate is reinforced further in local policy aspirations through its inclusion in Draft WCP Policy 1 (Westminster's Spatial Strategy). Part B of this Policy states that growth will be delivered through Westminster, in part, through the Ebury Bridge Estate Housing Renewal Area designation. The supporting text for this designation notes that the Site is to be afforded particular attention in guiding the delivery and uplift of housing, retail, community facilities and public realm enhancements, underpinned by high quality design.

More information on WCC's aspirations for the estate are provided in Draft WCP Policy 6 (Spatial Development Priorities), which notes the following priorities for the Ebury Bridge Estate:

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

The supporting text for this Policy highlights that the Ebury Bridge Estate has been identified as a strategic opportunity within the borough since 2010 (having been included in Westminster's Housing Renewal Strategy 2010) as a result of its current issues – which includes an ageing housing stock, overcrowding and a poor quality public realm. As one of the oldest housing estates in the borough, it is therefore increasingly expensive to maintain and difficult to meet modern accessibility and sustainability standards. Extensive retrofitting schemes would not be cost effective as they would not allow for the substantial uplift in accommodation able to be secured as part of this proposal – neither would it facilitate the wider benefits of enhancements to community facilities, open spaces, living quality and connections to the surrounding public realm also now being proposed. As set out in the submitted Estate Regeneration Statement (Ref. EBR-03-A) and the Statement of Community Involvement (Ref. EBR-04), the preferred scenario amongst residents was therefore redevelopment and renewal.

Draft WCP Policy 6 concludes outlining that the long-term renewal of the estate can target these issues with a view to improving the quality of life for residents, both existing and new; whilst providing additional housing stock that is better value for money. It is for these reasons that the Draft WCP designates Ebury Bridge Estate as both a Key Development Site and a Housing Renewal Area. The aspirations for the Ebury Bridge estate that are embedded in the Draft WCP provide a robust continuation from the Current WCP – the accompanying Policies Map of which identifies the estate as "Proposal Site F2". Appendix 1 of the Current WCP provides a more detailed list of Proposals Sites within the borough, with a supporting paragraph that notes that such sites are "of strategic importance to the delivery of Westminster's City Plan." Those identified within the list as having a capacity for over 100 housing units would "have implications for the housing target" if they failed to come forward for delivery. In this respect, Ebury Bridge as Site F2 is identified as a Housing Renewal Site.

#### Masterplan Strategy

As set out above, the principle of the estate's regeneration was established by the Full Application Ref: 14/01295/COFUL which, approved on 7<sup>th</sup> March 2016, involved the partial redevelopment of the Ebury Bridge Estate comprising the demolition of 172 flats to provide 271 new homes (an uplift of 99 dwellings). Whilst this permission has since expired unimplemented, the Council has previously accepted the principle of the regenerate the Ebury Bridge Estate is still present. As such, this expired planning permission is still considered material.

As set out in the submitted Statement of Community Involvement (Ref: EBR-04), an extensive consultation process has been ongoing across the estate since 2013 when original plans to regenerate the estate were tabled. When these plans were found to be unviable however, discussions with the community which took place from 2017-2018 focussed on the devising of eight potential development scenarios. As set out in more detail in the Statement of Community Involvement (Ref: EBR-04) and Section 6.6.2 below, Scenario 7 was selected which involved the wider demolition and rebuild of the estate. Devised in tandem with the aspirations of the local community, the redevelopment of the Ebury Bridge Estate is therefore in full compliance with Draft LP Policy H8 and the Mayor's Good Practice Guide to Estate Regeneration.

The ethos underpinning the regeneration of the Ebury Bridge Estate is the delivery of high quality housing within a diverse and sustainable neighbourhood that comprises the familiar features typical of an urban village - such as tree lined streets, squares and parks that embody a sense of place. Such a proposal will therefore derive the maximum benefits for existing and future residents across the borough that, in accordance with the Draft LP Policy H8, the Current WCP and Draft WCP Policies 1 and 6, justifies the scale of the intervention.

Accordingly, the principle creating a new Masterplan across the Ebury Bridge Estate as part of this Hybrid Outline Application is in full accordance with national, regional and local policy.

# 6.6 **Residential Uses**

### 6.6.1 Quantum and Density

Chapter 5 of the NPPF concerns the delivery of sufficient homes, with paragraph 59 noting the government's support for schemes that significantly boost the

supply of houses. However, to allow this, a sufficient amount and variety of land must come forward where it is needed. In accordance with NPPF paragraph 38, Local Planning Authorities (LPAs) should therefore approach decision taking in a positive way, looking for solutions rather than problems and seeking out the approval of applications for sustainable development where possible.

Current LP Policy 3.4 seeks to optimise the housing potential of sites having regard to local context, design principles and public transport accessibility levels (PTAL). Accordingly, the Current LP Density Matrix in Table 3.2 provides guideline residential densities expected with consideration to respective PTAL levels. The Ebury Bridge Estate has a PTAL 6b in a central location. On this basis, the Density Matrix would require developments in this location to constitute a minimum density of 355-405 units per hectare; or 650-1100 habitable rooms per hectare. However, the supporting text to the matrix notes that these provisions should not be enforced prescriptively. Rather, each development should be assessed within its own context.

Within this context, Chapter 3 in the Saved UDP should be noted which, concerning the borough-wide need for additional homes, states that housing and residential environments have the highest priorities in the plan. In this respect, Saved UDP Policy H3 affirms that the City Council will seek to maximise the amount of land or buildings in housing use outside the CAZ and, where appropriate, within the CAZ. Notwithstanding this, Saved UDP Policy H11 states that the densities of housing developments should conform to ranges of the Zones shown on the Saved UDP Proposals Map. The Ebury Bridge Estate, being within Zone 2, should therefore have a density of 250-500 hr per hectare. It should be noted that this range is below that of the Current LP. In this respect, Part B of the Policy states that development above the prescribed density ranges may be permitted "if they are close to public transport" and meet complementary design, transport and amenity policies.

The Draft LP comprises policies founded on the "golden thread" principle of 'good growth'. For housing delivery this means guiding London's development in a way that allows it to meet the needs of its growing population on existing brownfield sites. A key component of this is the support of mixed use developments that are able to distribute the success of London's economy, whilst delivering more housing and creating stronger communities.

In terms of location, the Draft LP emphasizes the importance of making best use of London's land – by using brownfield sites and intensifying the density and use of existing places. Draft Policy H1 reinforces this, noting that boroughs should seek to optimise the potential for housing delivery on all suitable and available brownfield sites. This is particularly important in Opportunity Areas (as per Draft LP Policy GG2).

Specific to residential uses within the CAZ, Draft LP Policy SD4 reiterates that such developments should be conserved and enhanced to meet the needs of diverse communities – albeit in a way that does not compromise the CAZ's wide strategic function.

The demand to optimise the use of land to meet increasing housing need has been reinforced by Draft LP Policy D3 which removes the Density Matrix in its

entirety. Instead, the Draft Policy states that in order for growth to be accommodated in a responsible way densities will have to be developed with a design-led approach. This stance is strengthened further by policy directions made by the SoS on 13<sup>th</sup> March, which states that higher density developments should be promoted in areas that are well connected by public transport and walking and cycling routes to jobs, services, infrastructure and amenities. Further, the densification of lower and mid density areas should be encouraged in an appropriate way.

The Draft LP sets the Westminster housing target at 985 new homes per year, equating to net completion of 9,850 homes over 10 years. Draft WCP Policy 8 however, sets the target over its 21 year plan period higher – to exceed 22,222 new homes which averages down to 1,058 new homes per year. This reinforces the borough's priority in genuinely optimising existing previously developed land.

Draft WCP Policy 8 also requires housing delivery to be "stepped up" over the first 10 years of the plan so that 1,495 new homes are delivered each year. This is to be done, in part, through optimising site densities in Housing Renewal Areas (such as Ebury Bridge Estate) and through planning positively for tall buildings in appropriate locations. Again, this reflects the wider Draft WCP's ambitious progrowth stance and seeks to set the foundation for the delivery of "more homes to meet actual need rather than just satisfying assumed capacity based on previous policy approaches".

Specific to the Ebury Bridge Estate itself, Draft WCP Policy 6 sets out the priorities of the Ebury Bridge Estate Housing Renewal Area. Alongside the need to improve the Local Centre and enhance connections to the wider area through improved public realm and green infrastructure, this policy notes the aim to oversee across the estate the delivery of "approximately 750 new high-quality homes."

#### Masterplan Strategy

In order to accurately assess the densities proposed across the Masterplan, it will be important to review the Proposed Development as a whole rather than on a phase by phase basis.

Accordingly, within the Detailed Area, 226 residential units are proposed. Alongside this, up to 36,610sqm of residential floorspace is proposed within the Outline Area, which, with the illustrative unit mix, would equate to an indicative provision of 532 residential units. Across the Masterplan therefore, a total of 758 new homes would replace the existing 336 units – an uplift of 422 units. This provision is in full accordance with Draft WCP Policy 6 which requires across the Ebury Bridge Estate approximately 750 new homes.

The area of the Ebury Bridge Masterplan is 1.86ha. The Site's current density is therefore 180 units per hectare, or 516 hr per hectare. Whilst only marginally higher than the 250-500 range required by Saved UDP Policy H11, this policy is considered out of date on the basis that a) it does not allow for any further development of the estate; and b) it is substantially below the level permitted by both the current LP Policy 3.4 and draft WCP Policy given how connected the

level of accessibility the area has – whilst also being contrary the principles of site optimisation required by the Draft LP.

With the total proposed provision of 758 homes across the same area (2,182 habitable rooms), the new density equates to 407 units per hectare and 1,160 hr per hectare. By both by unit numbers and habitable rooms, this only marginally exceeds the guidelines ranges set out in Current LP Policy 3.4. However, within the context of the Draft LP and Draft WCP it is considered that the scheme genuinely optimises the use of the land in a way that respects the surrounding constraints and land uses of its central and highly accessible location – with the final quantum of housing proposed being in full accordance with Draft WCP Policy 6.

This consideration is supported by the Design and Access Statement submitted with this Hybrid Outline Application, which illustrates in more detail how the design of the Masterplan is as such to respond to the wider impacts of the scale, whilst the submitted Environmental Statement (Ref. EBR-13) illustrates how the capacity of physical, environmental and social infrastructure has the capacity to suitably support the densities now proposed.

The level of density proposed across the Masterplan is therefore in accordance with both the Draft LP Policy D6, and also the Draft WCP's increasing "progrowth" stance. Ebury's contribution of new homes would therefore be significant in meeting the housing needs of both the City of Westminster (in accordance with both Draft WCP Policies 6 and 8) and Greater London as a whole (in accordance with Draft LP Policy D3).

#### Detailed Strategy

Looking at the Detailed Area in isolation of the wider Masterplan, it comprises Blocks 7 and 8 which, situated adjacent to the railway, are within the proposed cluster of taller blocks along the Site's eastern edge. Standing at a maximum of 18 and 17 storeys in height respectively, Blocks 7 and 8 combined comprise 226 residential units and 676 habitable rooms.

The size of the Detailed Area measures 0.45ha, with the resulting density being 502 units per hectare and 1,502 habitable rooms per hectare. In accordance with Draft LP Policy D6, set out below are the additional measures of density of the detailed residential floorspace proposed:

- Bedrooms per hectare: 1000 bedrooms per hectare;
- Bedspace per hectare: 1855 bedspaces per hectare;
- Floor Area Ratio: 60,846m<sup>2</sup> per hectare
- Site Coverage Ratio: 5,206m<sup>2</sup> per hectare

This density is greater than that of the wider Masterplan as a result of Blocks 7 and 8 being some of the taller elements proposed. In this respect, only the adjacent Block 6 Development Plot is envisaged to be taller.

As part of the wider Masterplan rationale however, which comprises a mix of taller and shorter buildings set around an enhanced public realm, the density is

considered to be appropriate and, in accordance with policy, complementary to its highly accessible location.

# 6.6.2 Affordable Housing

The centrality of delivering affordable housing through major developments is highlighted in NPPF Chapter 5. The NPPF also draws attention to key factors for delivery. For large developments such as the Proposed Development, the need to deliver levels and types of affordable housing, in line with local plans, is noted.

Current LP Policy 3.11 states that affordable housing within new developments should be maximised with a view to ensuring an average of at least 17,000 more affordable homes per year in London. Current LP Policy 3.14 similarly resists the loss of housing, including affordable, without its planned replacement at existing or higher density.

Draft LP Policy H4 notes London's strategic target for 50% of all new homes to be genuinely affordable with major developments required to provide affordable housing in line with the Draft Policy H5's Threshold Approach. Whilst this is noted, footnote 52 clarifies that separate affordable housing requirements apply to estate regeneration schemes – Draft Policy H8 in particular which is specific to estate regeneration proposals.

Draft Policy H8 notes that the loss of existing affordable housing in this instance will only be acceptable where it is replaced at existing or higher densities with at least the equivalent levels of floorspace. Accordingly, all estate regeneration schemes should as a minimum seek to re-provide the affordable floorspace lost whilst also maximising the affordable housing uplift through the Viability Tested route. This is a view reiterated in the Mayor's Affordable Housing SPG. Additionally, affordable housing that is replacing social rent housing must be provided as new social rent housing where it is facilitating a right of return for existing tenants. If it is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. This approach is reflected in Current WCP Policy S16 and Draft WCP Policy 9 which both resist net losses of affordable housing within the City.

The Mayor's Good Practice Guide to Estate Regeneration recognises the benefits of the redevelopment of existing housing estates, though notes that such schemes should be shaped with the wellbeing of existing residents at its heart. Accordingly, prior to demolition, alternatives should be considered to assess if there are any less disruptive and more cost effective methods of enhancement that can still achieve the same vision and objectives. Alongside Draft LP Policy H8, the Guide further states that where the demolition of affordable homes is considered to be the best option and GLA funding is being pursued, then a ballot must be carried out where existing residents have the opportunity to have their say on the proposal. Although in this respect, the SoS Cover Letter issued to the Mayor on 13<sup>th</sup> March setting out his considerations of the Draft LP should be noted – with particular reference to the SoS's view on ballots as an "onerous condition" of estate regeneration schemes.

With regards to quantum of affordable housing, Current WCP Policy S16 seeks more than 30% of new homes as affordable housing. Draft WCP Policy 9 is proposing to raise this threshold requirement to a minimum of 35% of residential units. In the supporting text it is highlighted that this threshold would apply to large-scale estate renewal as well. In this instance, Draft Policy 9 notes that the 35% threshold does not refer solely to proposed uplift – rather, it can include any affordable homes that are also being reprovided.

With regard to tenure split, the Draft LP Policy H6 and the Mayor's Affordable Housing SPG requires 30% to be provided as low cost rent (social rent or affordable rent), 30% as an intermediate product; and the remaining 40% to be determined by the Local Planning Authority taking into account their relevant local plan policies. The income thresholds to allow households to qualify for such housing are set out in the London Plan Annual Monitoring Report 15 (October 2019) – in particular paragraph 3.75.

#### Masterplan Strategy

Whilst the proposal contains a Detailed Area and a separate Outline Area, it is important that affordable housing provision is assessed across the Proposed Development as a whole – at Masterplan level. This ensures that, within the context of the entirety of the existing estate being renewed, the correct targets and performance indicators are being met

Accordingly, across the Masterplan an indicative total of 2,182 habitable rooms are proposed – of which 1,217 are being provided as affordable tenures. This, comprising a mix of both new affordable units and existing units being reprovided, equates to an affordable provision of 56%. This exceeds the Draft LP's strategic target of 50% as well as both the Current and Draft WCP's minimum affordable requirements.

In terms of affordable uplift being proposed, across the Masterplan as existing (prior to the demolition of Edgson House), there were a total of 336 residential units – comprising 198 residential units (548 habitable rooms) held in Social Rent tenures (which comprised 11,352sqm of floorspace), 138 units (411 habitable rooms) as private, and no intermediate units.

As set out in Table 3 above, of the illustrative 758 units now proposed 422 units (1,223 habitable rooms) are an uplift above the existing housing provision. This comprises 102 social rent units (438 habitable rooms) and 86 intermediate units (231 habitable rooms). On a habitable room basis therefore, the total uplift comprises 55% affordable. This represents a substantial increase above existing, contributing much needed affordable housing towards Westminster's stock. As set out in the accompanying robust Financial Viability Assessment, this is the maximum affordable uplift that is practicable across this development and is a provision therefore fully in line with the Draft LP, the Mayor's Affordable Housing SPG, and also the Mayor's Good Practice Guide to Estate Regeneration.

In terms of the physical reprovision of affordable floorspace required by Draft LP Policy H8, whilst 1,217 habitable rooms are proposed as affordable across the Masterplan (which equates to 56% of the total 2,182 habitable rooms proposed), the total Social Rent provision (986 habitable rooms) equates to 45%. The total

gross internal area of the floorspace of the 758 residential units proposed is 53,199sqm (36,610 sqm within the Outline Area and 16,589sqm in the Detailed Area). Commensurate with the 45% Social Rent split therefore, 23,940sqm of the total residential unit floorspace will be Social Rent. When read alongside the existing comparative floorspace (11,352sqm), this represents an increase of 12,588sqm of Social Rent floorspace above the existing. This provision is therefore fully policy compliant.

In terms of tenure, Masterplan wide, 81% of the affordable provision will come forward as Social Rent and 19% will come forward as Intermediate tenures. Whilst the Intermediate provision falls short of the 30% noted by the Mayor's Affordable Housing SPG, this split has been devised with consideration to the needs of both those Ebury Bridge Estate residents that have been decanted, and the needs of the wider borough. It is therefore considered acceptable – more so as the prevailing need within Westminster specifically is for Social Rent units more than Intermediate units. The thresholds and eligibility criteria for future residents in these new dwellings will be devised in full coordination with WCC and set in accordance with the London Plan Annual Monitoring Report 15.

In terms of tenure distribution, whilst this will crystallise with subsequent Reserved Matters Applications the aspiration is for different tenures and unit mixes to be distributed evenly across the Proposed Development. This will contribute towards the wider aim of creating a genuinely mixed and balanced community.

With regards to existing residents across the estate, as set out in the submitted Estate Regeneration Statement (Ref. EBR-3-A) and Estate Management Strategy (Ref. EBR-3-B), one of the fundamental commitments to all existing residents was that they be offered a right of return. This has been assured throughout the extensive round of consultations that have been ongoing across the estate since 2013 - when the original plans to redevelop went to a resident ballot and were successful. Within this context therefore and given the time constraints associated with the ongoing decant, it was not considered appropriate to undertake an additional ballot in advance of the submission of this Hybrid Outline Application.

We recognise that both Draft LP Policy H8 and the Mayor's Good Practise Guide encourage ballots to ensure that residents on estate regeneration sites get a fair deal and that the emerging proposals are transparent with the view that GLA grant funding will be withheld if no ballot is carried out. In this respect, GLA grant funding was not considered to be required in this instant as the affordable housing mix proposed is both optimum and viable in ensuring (i) that existing residents can return to the estate, with all existing affordable habitable rooms and floorspace being reprovided; and (ii) that of the net residential uplift, 55% is affordable. Of the total residential provision across the Masterplan as a whole, 56% is affordable. These provisions have been achieved without the need for Mayoral funding and are considered sufficient to facilitate the creation of a mixed and balanced community.

Notwithstanding GLA funding not being considered a requirement for this proposal, it is noted that receipt of such funding is dependent on the successful completion of a resident ballot. In this respect the Council does not wish to

undertake such a ballot as it believes one-off votes on regeneration projects are, by their nature, a snapshot in time – with there being no considered substitute for comprehensive opinion recording over a sustained period. The Statement of Community Involvement (Ref: EBR-04) submitted as part of this application provides details of this process carried out in advance of both this submission; and also the submission of the Full Application Ref: 14/01295/COFUL for the first iteration of the Ebury Bridge Estate's redevelopment. As noted in this document, support for the renewal of estate has been long, ongoing and robust. It should be noted that, pursuant to the 2014 application, one such consultation exercise included a resident ballot; the result of which was widespread support.

From a logistical perspective, submitting this Hybrid Outline Application in a timely manner is a requirement to facilitate the momentum of the ongoing resident decant. Balloting now would therefore result in undue delays to application submission, alongside potentially frustrating residents who are widely keen for the estate's renewal to commence; having already engaged in one such historical ballot; and since, a comprehensive consultation process.

The Proposed Development is therefore in accordance with the spirit of the Mayor's Good Practice Guide. In this respect and particularly in light of the views on balloting expressed by the SoS in his letter to the Mayor on 13<sup>th</sup> March, it is considered that balloting in this instance would be unwarranted. The absence of a ballot in this case should not be an obstacle in the determination of this Hybrid Outline Planning Application.

#### <u>Detailed Strategy</u>

With a view towards facilitating a prompt decant of residents already located off the Site, Blocks 7 and 8 will comprise a high provision of affordable housing. Of the 226 units (676 habitable rooms) provision, 414 habitable rooms and 111 habitable rooms will be provided as Social Rent and Intermediate housing respectively. This equates to a 78% affordable provision across the two blocks. This will be split 79% Social Rent and 21% Intermediate.

In terms of affordable distribution, Blocks 7 and 8 each have only one core. The different tenures will therefore be distributed throughout to ensure an even tenure balance.

As noted above however, the affordable provision should be assessed at a Masterplan level rather than on a block by block basis given that the proposal will function and operate as a new thriving neighbourhood. Accordingly, whilst the affordable provision in Blocks 7 and 8 is high in order to facilitate decant, the Financial Viability Assessment (EBR-16) notes that as current, the illustrative Masterplan could still deliver a 56% affordable provision.

### 6.6.3 Dwelling Mix

NPPF paragraph 61 draws attention to the importance of delivering dwellings comprising a variety of sizes, types and tenures to meet the broad needs of different groups in the community.

Draft LP Policy H10 reiterates this, setting the expectation that residential schemes should comprise a range of unit sizes. This is with the aim of meeting local housing need, delivering mixed neighbourhoods across London, responding to location specific circumstances, achieving the optimum potential of sites and reducing pressure on existing stock.

Current WCP Policy S15 states that residential developments should achieve a mix of size, type and affordable housing provision that contributes to meeting the City's affordable housing needs and creates mixed communities. This is a point also echoed by Saved UDP Policy H5, which goes further in noting that the Council "will normally require 33% of housing units in housing developments to be family sized". This is in response to the expectation by the City Council that the number of children within the borough is expected to increase – with a steer towards a higher provision of larger units encouraging families to live in and stay within Westminster. In this respect however, the supporting text notes that there will be occasions when a lower amount of family housing will be appropriate.

Select policies in the UDP were saved in 2010. The policies within the Draft WCP therefore are based on and underpinned by more up to date population trends. In this respect, Draft WCP Policy 11 on Housing for Specific Groups still requires new housing to be delivered as a mix of sizes and types, though with the stipulation that 25% of all new homes will be 'family sized' (between three and five bedrooms) rather than 33%.

#### <u>Masterplan Strategy</u>

The dwelling mix proposed across the Masterplan, which includes the indicative mix derived from up to 36,610sqm of residential floorspace proposed in the Outline Area and the 226 units proposed as part of the Detailed Area, is illustrated below in Part (ii) of Table 10.

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
(i) Existing quantum	128u	149u	41u	18u	0	336u
(ii) Proposed quantum	270u	335u	132u	17u	4u	758u
(iii) Uplift	142u	186u	91u	-1u	4u	422u
% Uplift	34%	44%	21.5%	-0.5%	1%	100%
×			22%			

#### Table 10: Indicative Dwelling Mix across Masterplan

The indicative dwelling mix proposed should be viewed within the context of the variety of dwellings already existing on the Site and which are to be reprovided (Part (i) of Table 10), with Part (iii) setting out the resulting uplift proposed for each residential dwelling type. In summary, a total of 758 residential units are proposed across the Masterplan as a mix of standard and duplex apartments, which represents an uplift of 422 units above existing. Of this uplift, 22% comprise family units.

Whilst the dwelling mix proposed across the Masterplan would provide a suitable variety of unit types and sizes to ensure the delivery of a mixed and balanced neighbourhood, it is recognised that Masterplan-wide the overall family provision of 20.2% (153 units out of 758) falls marginally short of the 25% family unit target. In this respect, it should be noted that the Masterplan dwelling mix has been informed by comprehensive discussions with estate residents with a view to understanding viable current and future needs - including the specific rehousing needs of existing tenants themselves. At this stage it is therefore only indicative with the view that final mixes will crystallise with future RMAs.

Alongside these discussions, the considered mix has also been underpinned by the wider site constraints – whereby the estate's highly accessible and central location within a CAZ, bounded by a railway to the east and a main road to the west, generally makes it less suited for a high proportion of family units. Accordingly, the minimum uplift provision of 22% family units across the Masterplan is considered to be in keeping with the rationale of both Saved UDP Policy H5, Current WCP Policy S15 and Draft WCP Policy 11.

#### Detailed Strategy

Table 11 below sets out the proposed dwelling mixes of Blocks 7 and 8 within the Detailed Area. With a total provision of 226 residential units, the % splits are in accordance with those envisaged for the wider Masterplan – whereby 26% of the units are "family sized" with the remaining provision are balanced between 1 and 2 bed units. This mix is therefore fully policy compliant.

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
Block 7 Total	35u	49u	26u	2u	0u	112u
Block 8 Total	33u	51u	25u	4u	1u	114u
Detailed Area	(0)	100	51u	6u	1u	226
Total	68u	100u	58			226u
Detailed Area % Split	30%	44%	26%			100%

#### Table 11: Dwelling Mix across Detailed Area

# 6.6.4 Housing Design Standards and Unit Quality

NPPF Chapter 12 states that achieving well-designed places is a key purpose of the planning system. Building on this theme, NPPF paragraph 127 signifies functionality, attractiveness and responsiveness to local context as important principles in the design of developments.

Draft LP Policies D4 and D6 stipulate that residential developments should be of high quality design, comprising comfortable and functional layouts that are fit for purpose and which do not differentiate between tenures. More generally, schemes should be designed on the good urban design principles with external and internal spaces that are comfortable and well laid out.

Individual dwellings should contain adequately sized, ergonomic rooms for modern living in line with the minimum internal floorspace requirements drawn from the Nationally Described Space Standard. These requirements should only be exceeded to an extent that also still achieves efficient use of land. Draft WCP Policy 13 also refers to the Nationally Described Space Standard, noting that selfcontained units should meet or exceed these standards.

Draft LP Policy D5 on Inclusive Design states that proposals should have regard for specific groups, being designed to include spaces for social interaction and community. These are views reiterated across the 41 standards set out in the Mayor's Housing SPG, which provide a framework of quality for new residential units. They enforce the need for homes to be a sanctuary, which are comfortable, private, well-lit and spacious – meeting the needs of current and future residents.

Supplementary to this, Draft WCP Policy 12 highlights that innovative design is encouraged, especially in intermediate and affordable tenures which, in themselves, should not be visually distinct from the private provision. Modern methods of building expected with a view to creating the highest quality residential units. Draft WCP Policy 13 explores in more detail the quality expected for new residential units, noting that they should be well designed, and of a standard that ensures the safety and wellbeing of its occupants.

Draft WCP Policy 7 concerns the requirement for new development to be "neighbourly" insofar as they should not unduly impact upon neighbouring sunlight, daylight or privacy and should not generate unacceptable levels of enclosure. This should be in addition to the development itself being imparted with sufficient sunlight and daylight, ventilation and sense of space. This can be achieved through sufficient set backs and locations of built massing, dual aspect dwellings with sensitively located windows, and 2.5 metre minimum internal ceiling heights.

#### **Outline** Strategy

The Architectural Design Code in Chapter 4 of the Design and Access Statement sets out in more detail the considerations that will inform forthcoming Reserved Matters Applications. This includes the requirement that all units meet the minimum Nationally Described Space Standards, 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 represents a substantial improvement on the current housing across the estate, of which, it is understood that two thirds do not comply with modern space standards and only 25% are dual aspect. With regards to privacy, windows should be located set back from main pedestrian and vehicles routes, and sufficient separation distances between the windows of habitable rooms should be maintained. This will ensure, in accordance with policy, that the new units will provide residents with the highest standard of living.

The affordable housing will be distributed across the Masterplan with the view towards establishing a more balanced community. A key facet of the Masterplan in this regard is to ensure the blocks are tenure blind – whereby each unit is designed to be of the highest quality with no "lesser design" or identifiable typologies reserved for the affordable provision. This will assist in the creation of a social balance in accordance with Draft WCP Policies 12 and 13.

In terms of "neighbourliness", the impacts of the proposal on properties beyond the Site has been a key consideration throughout the design process. The proposed heights and massing of the entirety of the Masterplan have been devised to ensure the scheme does not unduly prejudice daylight and sunlight to surrounding windows; and that the massing itself does not create an undesirable microclimate which adversely impacts on surrounding residents.

The Environmental Statement submitted in support of this Hybrid Outline Application includes a chapter on sunlight and daylight and a chapter on microclimate impacts. These set out how the Proposed Development has evolved and shaped to fully consider these impacts – with the final height and massing proposed being that which best mitigates any instances of "un-neighbourliness" in accordance with Draft WCP Policy 7. With regards to the quality of daylight within the Masterplan itself, the submitted Daylight and Sunlight Report (Ref: EBR-06) notes that adequate daylight levels should be attainable within habitable rooms across the vast majority of the Proposed Development. Whilst in isolated areas, notably at low levels that are inward facing, daylight levels would fall, this can be mitigated at RMA stage through the use of larger windows and sensitive unit layouts. With this in mind, the Masterplan would also achieve BRE compliant levels of annual and winter sunlight.

#### Detailed Strategy

Whilst Blocks 7 and 8 are not otherwise governed by the Outline Area parameters, the good design principles have still been fully utilised to ensure these blocks provide high quality living environments.

Of the 226 residential units proposed, 218 will be dual aspect. In accordance with the Draft LP, this will ensure every unit will receive a suitable quality of sunlight and daylight. As noted in the submitted Daylight and Sunlight Report, this has ensured that even those units on the lower floors (tested as the worst case scenario) will have good access to daylight amenity in at least one habitable room; with sunlight tests demonstrating that the majority of these units will also have access to levels of sunlight that meet (or else are only marginally below) the BRE recommendations.

All units will meet or exceed the minimum national space standards, will have minimum ceiling heights of 2.5m and will have sufficient areas of inbuilt storage – in full compliance with the standards set out in the Mayor's Housing SPG. Further, the majority of units will be provided with a policy compliant provision of private outdoor amenity space – either in the form of terraces for units on the ground floor, or balconies for those on the upper floors. As set out in more detail in section 6.9.2, those units that do not have a policy compliant provision of private amenity space will still be equipped with smaller Juliet balconies which, at a minimum of 0.5m in depth, would still allow opportunities for standing outside.

In terms of privacy, there are no ground floor windows which front directly onto a main public route. All are set back behind their respective private amenity spaces and, beyond, additional strips of defensible landscaping. With regards to overlooking, a sufficient separation distance is proposed between the north facing habitable rooms of Block 8 and the south facing habitable rooms of Block 7. This will avoid instances of privacy breach in accordance with Draft WCP Policy 7.

In terms of the sunlight, daylight and wind impacts of Blocks 7 and 8 on the surrounding context, as set out above, these components were considered as part of the assessment of the wider Masterplan. The respective chapters of the submitted Environmental Statement confirm that these blocks would not adversely impact on surrounding residential properties.

It is therefore considered that, in full accordance with national, London and local policy, the units proposed in Blocks 7 and 8 have been designed to fully and sensitively consider the needs of future occupants - whilst mitigating any resulting adverse impacts within the wider area.

# 6.6.5 Housing Accessibility

As part of achieving 'well-designed places', NPPF paragraph 127 highlights that development should promote accessibility. This approach is also carried through to NPPF paragraph 91 where it is noted that accessibility is key to achieving healthy and safe communities.

On accessible housing, Draft LP Policy D5 states that at least 10% of dwellings should be wheelchair user dwellings designed in accordance with Building Regulation requirement M4(3). The remaining dwellings within a development should be accessible and adaptable in line with Building Regulation requirement M4(2). This requirement is also noted in Draft WCP Policy 13.

#### **Outline** Strategy

The approach to accessibility across the Outline Area is set out in the Design Code Chapters of the Design and Access Statement – which stipulates that, as part of any emerging Reserved Matters Application, at least 10% of dwellings will be designed in accordance with Building Regulation requirement M4(3), with the remainder to be designed in accordance with Building Regulation requirement M4(2). This mechanism will ensure the policy requirement for accessible housing will be met across the Outline Area.

#### Detailed Strategy

A minimum of 23 units will be provided across Blocks 7 and 8 as designated wheelchair units for use by mobility impaired residents. These will be designed to M4(3) "adaptable" standards whereby if a resident requires a fully accessible wheelchair unit they can be easily adapted for such. The remaining units will be designed to M4(2) standards. In terms of location, within each block the wheelchair units will evenly distributed across all floors and provided across all tenures to ensure the greatest degree of choice is given to residents who require them.

Across the 226 units proposed within the Detailed Area therefore, the cumulative provision of 23 wheelchair dwellings represents 10% in accordance with policy.

# 6.7 Non-Residential Uses

### 6.7.1 Community Uses

Chapter 8 of the revised NPPF promotes the creation of healthy and safe communities. This is expressed in NPPF paragraph 91 which emphasizes the importance of creating places for meeting and interacting through, for example, strong neighbourhood centres. NPPF paragraph 92 goes on to highlight the planning system's role in supplying the social, recreation and cultural facilities and services that are crucial in meeting community needs. The paragraph references the importance of safeguarding existing valued facilities and the need to ensure an integrated approach in new developments which should combine residential, economic and community uses.

Draft LP Chapter 5 also highlights the importance of community uses, referring to these as 'social infrastructure'. Draft LP Policy S1 considers that social infrastructure should be high quality and inclusive to London's diverse communities by meeting local or strategic need.

Both Saved UDP Policy SOC 1 and Draft WCP Policy 18 take a similar approach to the above, seeking to protect existing community facilities where they serve a defined need and welcoming additional community facilities on sites where appropriate. Where proposals involve the redevelopment of a community facility, adequate replacement facilities appropriate to their location should be provided.

Specific to the Ebury Bridge Renewal Area, improvements to the existing community facilities are identified as a spatial development priority in Draft WCP Policy 6.

#### **Outline** Strategy

A total of 177sqm of community floorspace existed across the original estate. This comprised a 23sqm gardening building and a 154sqm facility in the basement of Edgson House that included a main hall, two small meeting rooms, office, toilets and a kitchen. From ongoing consultations, we understand that this space was used primarily by both a local youth club and by the Ebury Bridge Residents Association – twice a week for 2 hours. In addition to this, the hall was used for

an hour a day as a food bank. These uses aside however, the space was underutilised as a community resource, possibly due to the facility's location in the basement where it received no natural light and had complicated accessibility for less mobile residents.

Following the demolition of Edgson House and its respective community hall, a replacement 79sqm community facility was proposed as part of the Meanwhile Use approved under Ref: 19/05038/COFUL. Whilst smaller than the original provision, this new facility would be of a substantially higher quality – able to provide a safe and accessible meeting place for the youth club and residents association whilst also serving as a primary community hub during the estate's renewal. This facility is however only temporary in nature, pending the delivery of a larger permanent community space as part of the Hybrid Outline Application.

With this in mind, Table 4 above provides the breakdown of uses and locations for the 3,018sqm of non-residential floorspace proposed across the Outline Area. As part of this, a fixed community provision of 158sqm is proposed for the ground floor of Block 5. This will take the form of a dedicated community hall to replace the original hall in Edgson House. Alongside this, non-residential floorspace is further earmarked in Blocks 1-4 and Block 9, assigned a more flexible, open Use Class to include a potential community D1 and D2 provision. This will allow the final variety of uses across the Masterplan to best respond to market and resident needs as and when pursuant Reserved Matters Applications crystallise. As current however and following ongoing conversations with residents, the illustrative assumption is that the flexible community provision in Block 9 will be delivered as a gym and a nursery.

In this respect, across Blocks 1-4 there is a provision for up to 1,600sqm of nonresidential floorspace comprising A1-A4 / D1, which would include no more than 150sqm Class D1 community space. This is equivalent to a single unit, such as a dentist.

In addition to this, Block 9 will include up to 910sqm of non-residential floorspace comprising D1/D2/A3 - whereby a maximum of 130sqm will be in use as A3. The remaining non-residential floorspace would therefore be in use for community facilities.

The minimum community provision proposed therefore is the 158sqm provision in Block 5 which will take the form of a dedicated community hall to replace the 154sqm facility originally in Edgson House. This new hall will be larger than the existing, more flexible, secure, and located in a landmark location within the estate. This will ensure a substantial intensification in its use and a far greater social benefit than the previous hall on the site. The space will be dedicated for community use including activities such as Mother and Toddler groups, Yoga, Youth Clubs, Arts and Crafts, Karate. Whilst the management details of this space are still to be finalised, it is envisaged it would be resident-led and/or in partnership with the potential flexible workspace provider who may also occupy the building.

It should also be noted that this hall represents the very minimum community provision possible – to be considered alongside the wider inbuilt flexibility to otherwise allow for a substantial increase in community floorspace as part of

future Reserved Matters Applications for Blocks 1-4 (up to 150sqm of D1 Class Use) and Block 9 (up to 910sqm of D1 / D2 in the absence of an A3 Class Use). In this respect, discussions with residents and neighbours are ongoing to clarify the community uses they would want prioritised within these blocks. These conversations would feed into the final design proposals for the respective Reserved Matters submissions.

In this respect, it is acknowledged that the existing 23sqm gardening building is not being reprovided as part of the Masterplan. However, community gardening activities within the Proposed Development will continue to be supported through the provision of community herb gardens on the podiums of the blocks themselves. It is also intended to utilise Social Value funding to employ local residents in the maintenance of the soft landscaping in the new public realm.

The community provision proposed is therefore in accordance with the community-focussed rationale of Chapter 5 in the Draft LP, and is also in keeping with the spatial priority for the Ebury Bridge Renewal Area stipulated by Draft WCP Policy 6.

In this respect, the evolving developments within the immediate context of the Site should also be noted. As part of the adjacent Chelsea Barracks Proposal, the "Chelsea Barracks Sports Centre" is proposed. A WCC Communities and Customer Services Policy and Scrutiny Committee Meeting (held March 2019) confirmed that construction of this sports centre is to commence in 2023 with delivery in 2026, and will include a sports hall, 25 metre swimming pool with learner pool, and a health and fitness gym.

#### Detailed Strategy

Habitable ancillary residential spaces are proposed in Block 7 by way of a Management Hub. Whilst serving as the main space across the Proposed Development for management, servicing and deliveries, this facility will also provide residents with break out spaces to seek advice and support as they settle into life in their new homes.

It is envisaged that Existing and new estate residents will play a key role in both the participation in community initiatives but also in the governance of the new estate. In this respect, residents will have shared access to the Management Hub's boardroom and meeting space. This will maximise the use of this space, providing fully accessible premises from which residents can get involved in the management of the scheme. This model is replicated at Grosvenor Waterside and other local developments such as Glastonbury House.

Alongside key governance roles, the Management Hub will also deliver resident employment and skills training from the shared meeting room space in partnership with Westminster Employment Service. Whilst these spaces are multi-use, they will otherwise only be available to residents across the estate rather than to members of the wider community. As such, they constitute ancillary residential rather than "community floorspace".

# 6.7.2 Commercial and Retail Uses

Throughout the NPPF, the valuable benefits of mixed use development are set out. In paragraph 91, the NPPF notes that mixed use developments in local centres can help promote 'healthy and safe communities' by establishing spaces for social interaction. The NPPF identifies that mixed use development should be of an appropriate amount and combination of uses, as a key principle to achieving well-designed places in paragraph 127.

Draft LP Policy GG1 recognises the benefits of mixed use developments in achieving good growth and inclusive communities. This is echoed in Draft LP Policy SD6 which recognises that, whilst the CAZ provides a vibrant and globally iconic core to London, it also contains housing, social infrastructure and community uses specific to address local need. In this respect, vibrant and mixeduse areas are key in supporting activity and vitality which in turn, will provide economic benefits.

Part of the Ebury Bridge Estate is located within the designated Ebury Local Centre. Accordingly, Draft LP Policy SD8 applies which notes that such centres should focus on the provision of convenient and attractive access to local goods and services that meet the day to day needs of residents. This role is reinforced by Draft WCP Policy 15, which states that, smaller in scale than District Centres, Local Centres play a more localised role for workers and residents - intended to provide a "focal point for community activity", delivering a mix of convenience shops and services for locals. As part of any new development therefore, they should therefore be protected and enhanced.

Draft WCP Policy 1 further notes that the evolution of town centres into multifunctional commercial areas to shop, work and socialise will be supported. With specific reference to the Ebury Bridge Estate, Draft WCP Policy 6 recognises that new, high quality retail accommodation is a spatial development priority for the area.

In terms of more general economic growth, draft WCP Policy 14 notes that additional B1 floorspace is required across the borough to support at least 63,000 new jobs over the Plan period. As such, additional office floorspace that meets the needs of modern working practices will be supported in principle in new developments located in the CAZ.

#### **Outline** Strategy

Table 3 provides the breakdown of the 3,018sqm of non-residential floorspace proposed as part of this submission, which is to be distributed across the Outline Area as per Land Use Parameter Plan Ref: 1208. As noted above, Block 5 will accommodate 158sqm of Class D1 floorspace alongside 350sqm of Class B1 floorspace. Whilst final management of these spaces will crystallise as part of future RMAs, it is envisaged that the Class B1 floorspace will be operated flexibly floorspace to accommodate more informal work space for smaller businesses and startups. Block 5 aside therefore, the rationale is currently to keep the non-residential land uses open and flexible – albeit with thresholds per Use Class to ensure diversity of use is embedded as a principle.

The final uses proposed will crystallise as part of future Reserved Matters Applications through discussions with operators, and will be informed by local stakeholders and residents of the Proposed Development to ensure their responsive needs are met. This method will ensure that the final land uses are fresh and are able to make the most valuable contribution to the community here providing community focus and employment opportunities. In this respect and as noted in the submitted Estate Regeneration Statement (EBR-03-A), businesses who have leased a unit on the existing estate since before July 2018 will be offered a right of first refusal for a new space across the development unless it is more appropriate for them to locate elsewhere. Those existing businesses who have leased after August 2018 will not have a right of first refusal, though they will be kept fully updated on the process if they do have an interest in remaining. The open and flexible approach to non-residential land uses being secured as part of this Hybrid Outline Application is thusly compatible with this process, whilst also being in full accordance with the Good Growth principles of Draft LP Policy GG1.

The distribution of commercial and retail land uses is particularly important in Blocks 1-4 whose western frontages are part of, and will form an extension to the Ebury Local Centre. The provision of high quality, flexible retail floorspace here would therefore contribute towards the vitality of the town centre whilst also providing key local conveniences to residents in full accordance with Draft LP Policy SD8, and Draft WCP Policies 1, 6 and 15.

#### <u>Detailed Strategy</u>

As noted above, Blocks 7 and 8 within the Detailed Area will contain residential ancillary floorspace that is open to residents only. There are otherwise no non-residential, retail or commercial uses proposed within the Detailed Area.

# 6.8 Design

As above, NPPF Chapter 12 states that achieving well-designed places is a key purpose of the planning system. NPPF paragraph 127 signifies functionality, attractiveness and responsiveness to local context as important principles in the design of developments.

### 6.8.1 Layout

Chapter 12 of the NPPF stipulates the importance of well-designed places. In particular, paragraphs 127 - 131 outline the requirements of new developments to be structured and laid out in a way that is appropriate, legible and attractive.

The importance of high quality design within the Draft LP is noted by virtue of Chapter 3 in its entirety which underlines key urban design principles that should be embodied within new developments to ensure they integrate into the existing context whilst providing comfort, safety and usability to and for its residents and visitors. Specifically, Draft LP Policy D3 lists the factors that should be considered to ensure a positive environment – this includes creating active frontages and inviting indoor and outdoor environments; and devising street layouts that prioritise easy pedestrian connections within and between neighbourhoods in order to encourage social interaction and support healthy lifestyles. Footpaths, entrances, shared circulation spaces and any other publicy accessible areas should be accessible and comfortable.

Much of the above criteria is similarly reflected in Draft LP policies D5 and D6 which state that development should be designed to account for London's diverse population. This means providing spaces that are designed to facilitate social interaction and inclusion; containing no physical barriers; allowing independent and safe access; and allowing for safe and dignified emergency evacuation for all building users. Developments should encourage street-based activity whilst maximising active frontages and natural surveillance onto public facing sides.

The importance of design and layout is similarly outlined in Saved UDP Chapter 10 and the "Design and Heritage" Chapter of the Draft WCP, which both stipulate the fundamental need for design to be "people-centred" – exemplifying the "very best in sustainable, urban living".

Specifically on form and layout, Saved UDP Policy DES 1 and Draft WCP Policies 39 – 46 underline the fundamental role of new development to enhance its local context by positively responding to local characteristics and valued features. This consists of respecting street layouts, building types, urban grains and scale; whilst at the same time establishing a new space or development that embodies legibility, and high quality. Additionally, the design of development should also consider the clear designation of public and private environments – roads, streets, and open spaces, with a view to maximising legibility, accessibility and user safety.

#### Masterplan Strategy

Whilst the Detailed Area of this Hybrid Outline Application is separate to the wider Outline Area, located within the centre of the Site and comprising two residential blocks and one of the four public squares, it forms an intrinsic portion of the wider Masterplan. Accordingly, its design and layout has been assessed against policy both as a standalone component as well as part of the overarching Masterplan strategy.

As set out above, the redevelopment of the Ebury Bridge Estate is underpinned by a number of design principles. Set out in more detail in the submitted Design and Access Statement, these revolve around the creation of a more cohesive network of legible, open spaces; high quality green infrastructure; new routes and connections both through the Site itself and into the surrounding neighbourhood; and the creation of buildings that are sufficiently separate to allow for views across the public realm whilst ensuring privacy for residents in homes within.

These principles together facilitate the creation of a new Masterplan for the Ebury Bridge Estate that, in accordance with Draft LP Policies D5 and D6, is safe, comfortable and accessible for residents and visitors alike. The proposal establishes a built massing that is not out of keeping for the central context – and is balanced with a substantial provision of open space that provides a communal focal point, a source of enhanced biodiversity, and a physical and visual connection to the wider built environment. These will be further supported by the provision of active frontages to support the creation of a truly "people-centered" development in accordance with Saved UDP Policy DES 1 and Draft WCP Policies 39 – 46.

# 6.8.2 Height and Massing

Draft LP Policy D9 concerns the London-wide strategy on tall buildings. It states that it is up to the borough to define both what constitutes a tall building and which areas are appropriate for them – though they should be located in areas that have capacity for such development. In this respect, the directions made by the SoS on 13<sup>th</sup> March are relevant. Whilst not specifically relating to tall buildings, the direction noted that the Draft LP should put more of an emphasis on the appropriate densification of lower and mid density areas.

Draft Policy D9 continues, noting that several factors should be considered at the design stage when it comes to including tall buildings within a scheme. These include the visual impact (in long, mid and immediate range views) on strategic and local views and, where possible, remedying any past damage to such views within the townscape. These points are similarly carried into Current WCP Policy S26 and Draft WCP Policy 41.

With regards to design, Draft LP Policy D9 requires tall buildings to be of exemplary standard so that their appearance can be maintained over its lifespan. They should also neither incur adverse reflected glare nor light pollution. For the benefit of users, the policy flags up that tall buildings must: contain corridors, entrances and exits with sufficient capacity and be constructed of safe building materials. On environmental impacts, tall buildings should not incur any detrimental wind, sunlight, temperature or air movement issues to adjacent outside spaces.

With regards to the classification and location of tall buildings within Westminster, the Draft WCP Policy 42 defines tall buildings as those which are more than 30 metres in height or else more than twice the prevailing context height (whichever is lower). The tallest building on Site will be up to 19 storeys located on the eastern edge - stepping down to circa 6 storeys for those blocks alongside Ebury Bridge Road. In policy terms therefore, the proposal includes "tall buildings".

Much like the requirements set out in the Draft LP, Draft WCP Policy 42 requires tall buildings to achieve exceptional architectural quality and contribute towards the shaping of an attractive and legible public realm; without affecting valued heritage assets, key views and landmarks. This is a view carried down from Saved UDP Policy DES 3, which states that high buildings "defined as being that which is significantly higher than its surroundings", should not be incongruous with respect to the prevailing character of the area within which it would be located.

In terms of location, Saved UDP Policy DES 3 notes that "the only location that could accommodate a very high building is at the eastern end of the Paddington

Basin". This however was based on a study of high buildings in Westminster carried out in 2000 which, within the context of the Draft LP and (as set out below) the direction of travel for the Draft WCP, is comparatively out of date. DES 3 does however state that this consideration would not otherwise preclude proposals for tall buildings coming forward where they genuinely offer a positive contribution.

Draft WCP Policy 42 states that tall buildings may be acceptable in Opportunity Areas and Housing Renewal Areas. More detail on this is provided in Draft WCP Policy 43 which, recognising the challenges and constraints of large scale public estate regeneration schemes, notes that what is considered an appropriate height must be balanced against the wider public benefits such a scheme is able to deliver. At the Ebury Bridge site for example, the policy notes there are opportunities for taller buildings – though any such development should respect the setting and views of the adjoining Conservation Areas, having the tallest elements towards the north and stepping down in height to the south.

#### Masterplan Strategy

The height and massing of the Ebury Bridge Estate Masterplan has been conceived as a Site-wide strategy rather than on a block-by-block basis. Accordingly, the height and massing of the Detailed Area has been assessed against policy as part of the overarching Masterplan strategy rather than just as a standalone element.

The Site as existing comprises mid-density development in a central, highly accessible location. It is located within the CAZ, within the Ebury Housing Renewal Area and adjacent to the Victoria Opportunity Area. With a railway on one side therefore, there is substantial scope in policy to include elements of height across the Site – not least given Draft WCP Policies 42 and 43, which accept the principle of tall buildings in Housing Renewal Areas and across estate regeneration areas as long as such proposals balance any harms against the wider public benefit of the scheme.

In this respect, the provision of tall buildings in this location will support the creation of a substantially enhanced housing estate which provides a legible network of high quality open spaces and a considerable uplift in affordable housing. This is therefore considered to weigh in favour of the scale of development proposed, offering a positive contribution welcomed by Saved UDP Policy DES 3.

In this respect, a Heritage, Townscape and Visual Impact Assessment (HTVIA) has been carried out as part of the submitted Environmental Assessment (Ref. EBR-13). This has assessed the visual impacts of the development on 26 views from and of heritage assets surrounding the Site and concludes that, in all but one of the cases (a view from the Pimlico Conservation Area), the proposal will either have a neutral or positive impact on views. The proposal will however result in a low degree of "less than substantial harm" to the Grade II listed National Audit Office and a low level of harm to a group of non-designated assets on Westmoreland Place as it would be seen in the background of their views. In this respect paragraphs 196 and 197 in the NPPF are relevant, which states that any

harms caused to designated or non-designated heritage assets should be weighed alongside the public benefits of the proposal, with a balanced judgement required. As noted in the Conclusion to this Planning Statement, the wider benefits of this proposal are substantial and weigh in favour.

Fundamentally, the proposal seeks to intensify the existing estate whilst at the same time, maximising the provision of open space at ground level. In doing this, five taller residential blocks (Blocks 5 - 9) are proposed along the Site's eastern edge. Block 6 represents the tallest which will peak at circa 19 storeys. This will then step down to Block 5 to the north and to Block 9 to the south – both of which peak at only 16 storeys. Each tower is flanked by a number of shoulder elements decreasing in size which will seek to lessen the bulk of block. The decreasing should heights of each are set out in Tables 5 and 9 above. The massing composition here is therefore compliant with policy.

The remaining blocks along the western edge (Blocks 1 - 4) peak at circa eight storeys. As the surrounding context is generally 3-9 storeys in height these blocks are not tall by comparison. However, in terms of adopted and emerging policy they are given that Draft WCP Policy 42 also defines a tall building as that over 30 metres in height. Notwithstanding however, the rationale for lower heights in this location is to respect the adjoining heritage assets - the Belgravia Conservation Area and the Listed Buildings fronting onto Ebury Bridge Road whilst at the same time providing a positive impact onto Ebury Bridge Road itself. The shoulder heights of Block 1-4 at Ebury Bridge Road is circa six storeys. Whilst Blocks 2 and 3 then step up the eight storeys away from the main frontage, Blocks 1 and 4 accommodate a further 7<sup>th</sup> storey shoulder at their flanks allowing for a greater sense of openness to the adjacent 1 Ebury Bridge and Cheylesmore House. These scales, when constructed, would provide a distinct and visually pleasing sense of enclosure onto Ebury Bridge Road in a way that would not diminish the quality of the existing built environment.

As set out in more detail in the Design and Access Statement, the design of all buildings proposed has been informed by the comprehensive consideration of the wider site constraints and proposal impacts. The tall buildings have a defined character and a distinct, bottom, middle and top – with façade zones that utilise robust and attractive materials that draw on the colour palette of the Site's context. They provide attractive landmarks for the Site and serve as a gateway to the Victoria Opportunity Area, complimenting the adjacent Grosvenor Waterside Development and emerging Chelsea Barracks. The height and massing strategy in this location is therefore considered policy compliant, resulting in a nature of development that provides genuine site optimisation.

# 6.9 **Open Space**

### 6.9.1 Public Open Space & Landscaping

As part of creating healthy and safe communities, NPPF paragraph 91 stipulates that development should supply high quality public space that is actively and continually used by communities. NPPF paragraph 96 builds on this, promoting the importance of a high quality network of open spaces which provide opportunities for physical activity and social interaction. Paired with paragraph 96, NPPF paragraph 175 encourages the incorporation of biodiversity improvements in and around developments, especially where this can secure measurable net gains.

Current LP Policy 2.18 stipulates the importance of the city's green infrastructure, and the need to ensure that open spaces are increasingly multi-functional in order to meet the demands place upon them. In this respect, green infrastructure and open space should be seen as integral parts to new developments rather than "add-ons". Draft LP Policy G4 reaffirms this, recognising the wide range of social, health and environmental benefits of open space. As such, new developments should create areas of well-designed and legible publicly accessible open space that, where possible, provides "corridors" of connectivity to existing surrounding spaces. This will maximise opportunities for ecological gains whilst providing a more eligible context for walking and cycling.

The role of outdoor open space in new developments is reiterated in Draft LP Policy D8, which emphasizes the importance of high quality planting, street furniture and surface materials - providing both ecological benefits alongside and a durable and useable public realm for residents and visitors. This is reiterated in Draft LP Policy G5, which expects new developments to contribute towards the urban greening of London.

Current WCP Policy S35 is in line with the above rationale of protecting and enhancing Westminster's open space network, noting that the Council will seek to develop further connections between existing open spaces.

Draft WCP Policy 35 follows on from Current WCP Policy S35, noting that major development will be required to provide new or improved public open space. The provision of additional, enhanced open space will provide a setting for play and recreation alongside an additional source of biodiversity and ecology. As reinforced by Draft LP Policy G5, opportunities to enhance existing habitats should similarly be maximised - with developments taking the opportunity to contribute towards the "urban greening" of the city by integrating green measures such as sustainable drainage systems, additional planting and grassland. In this respect, Draft WCP Policy 44 is also relevant which welcomes the integration of landscaping and planting to the public realm as a way of providing visual interest and environmental relief. These could be provided in the form of pocket parks.

#### <u>Masterplan Strategy</u>

Prior to the demolition of Edgson House, there was a total of 1.35ha of outdoor space across the Site that, comprising no built form, was otherwise publicly accessible. Whilst a degree of this comprised play and amenity areas, the majority consisted of roads, alleyways, verges, courtyards, fenced off planting and "left over space" between blocks. These spaces, whilst "open" and in some cases grassed and treed, were otherwise poorly defined and served limited levels of usability and biodiversity value.

The open space and landscaping strategy for the wider Ebury Bridge Masterplan was therefore focussed on the creation of a new public realm that, comprising a network of legible routes and open spaces, was defined, fully useable, well lit and connected. In accordance with adopted and emerging policy and good practice design, the creation of connections beyond the Site was essential. Hence the provision of new gateways to the north and south, alongside a number of more welcoming pedestrian and vehicle routes into the site, will ensure enhanced usability not just for estate residents but for locals in the wider neighbourhood.

In total the Proposed Development provides 0.95ha of specific and fully useable publicly accessible open space for the indicative 758 residential units proposed. This area is defined on the Ground Floor External Amenity Parameter Plan (Ref. 011160) and illustrates how, with the development plots located closely adjacent to the east and west Site boundaries, a clear and defined public realm is created as a "spine" in the form of landmark gateways to the north and south of the development; a network of four connected public squares with interlinked pedestrian and cycle routes in, through, and out; and landscaped entry points from Ebury Bridge Road. Engaging childrens' playspaces, and playable landscaping are distributed throughout that, in quantum terms, represents an increase above the existing estate's play provision. This will ensure the landscaping provision embeds full flexibility to meet the varying needs and demands of residents and visitors and is of the utmost quality in terms of usability.

The locations of the development plots closely adjacent to the Site boundaries would also ensure that the public realm running between is not subject to undue levels of overshadowing. In this respect the submitted Daylight and Sunlight confirms that, of the five areas of the Masterplan assessed, four will far exceed the BRE recommendations with 82%-99% of the area of these spaces achieving at least 2 hours of sunlight when assessed on 21<sup>st</sup> March under spring sun. When assessed on 21<sup>st</sup> June under summer sun, all assessed spaces far exceed BRE recommendations.

A key landscape constraint was the need to incorporate vehicle access into the development, required for disabled residents alongside the wider servicing and operational needs of the blocks when occupied. Roads therefore are to be delivered as Homezones – shared-surface areas that prioritise use by pedestrians and cyclists, and through which, vehicles may pass. Full consideration however will be given to users with visual impairments through the use of paving types, contrasting colour kerb lines and textured finishes.

In addition to public open space, an illustrative provision of 0.31ha of communal private space is proposed across the Masterplan in the form of podium gardens for all blocks, and roof terraces for Blocks 5-9. These spaces will be sensitively landscaped and accessible to residents of the respective blocks – providing a further source of useable open space for estate residents.

Whilst it is acknowledged that, on a per unit basis, the open space provision has reduced, the quality of the new open spaces provided are substantially improved (both in amenity, usability and ecology terms) and are more widely accessible to the local neighbourhood. This is therefore an improved position from the existing estate which, due to its layout, contained open spaces that, with limited usability, were generally isolated from the wider neighbourhood. The quantum and quality of open space provided is therefore considered compliant with Draft LP Policy G4

and G5; and Draft WCP Policy 35 - commensurate in provision with the Site's central context.

In terms of the landscaping proposed across the new open space, the Landscape Design Code at Chapter 5 of the submitted Design and Access Statement provide more detail on the rationale expected across the Outline Area. In accordance with Draft WCP Policy 44 this is to comprise a diverse range of planting specific to the nature of the spaces being created; a variety of hard surfaces and landscaping finishes to compliment the expected uses; street furniture to encourage social use and interaction.

With particular reference to bats, it is acknowledged in the Ecology Chapter of the submitted Environmental Statement that those buildings being demolished and landscaping being cleared as part of the Outline Area could potentially support bat roosting or foraging sites. In this respect, the landscaping strategy for the Masterplan incorporates elements such as bat boxes in building facades, rain gardens, "native woodland" style planting and elevated podiums and roof gardens on Blocks 5-9 designed to accommodate plants and small trees – with an illustrative external lighting strategy designed to be compatible. These will provide habitats for foraging and commuting bats, whilst also promoting bat connectivity between the Network Rail land to the east and the new ground level landscaping within the development to the west. Notwithstanding, additional survey work will be undertaken ahead of demolition within the Outline Area to provide clarity on the existence of potential bat roosts. The final details and locations for planting and landscaping types will emerge with forthcoming Reserved Matters submissions. The Landscape Design Code in chapter 5 of the Design and Access Statement however makes it clear that, where reasonably practical, urban greening should be a key consideration. Methods of maximising urban greening should be explored and species' with the highest ecological value should be selected in accordance with Draft LP Policy G5. With this in mind, alongside landscaped podiums and roof terraces, biodiverse green roofs on the upper levels of Blocks 1-4 are also proposed.

#### Detailed Strategy

The Detailed Area includes one of the four main squares across the development. Whilst designed to allow vehicles to enter, traverse and exit, the square utilises landscaping and surfacing to prioritise its use for pedestrians and cycles. This allows areas of roadway to still contribute towards the Site's wider publicly open space provision in accordance with Draft LP Policy G4. The Detailed Area thusly comprises a total of 0.21ha of publicly accessible open space with a layout illustrated in Figure 5

As required for the Outline Area, the Detailed Area includes landscaping of the highest value, located to define the key uses around the Site – the demarcation of semi-public and defensible space; areas for play; areas for circulation; and areas for defined social interaction and gatherings. In this respect, the focus of the Detailed Area would be the central portion of the square which contains playspace and playable features, clusters of trees and plants and walking trails. Alongside this and with a specific emphasis on biodiversity, this area will also accommodate bird and bat boxes and natural timber elements for wildlife to colonise.



Figure 5: Landscaping Proposal for Detailed Area

The central portion of the square contrasts with the more formal landscaping around its edges which, whilst in the interests of safety, delineates the areas the cars, it also uses breaks in planting and changes in material to highlight the entrances to Blocks 7 and 8 and their respective defensible spaces. The landscaping strategy for the Detailed Area is therefore fully compliant with policy, insofar as it provides a high level of amenity and environmental value whilst also maximising urban greening.

Alongside the public square, ground level defensible spaces and peripheral planters, the Detailed Area also includes communal private open space in the form of landscaped podium gardens at first floor level; and further terraces at 12<sup>th</sup> and 13<sup>th</sup> floor levels of Blocks 7 and 8 respectively. Accordingly, using the calculations set out in Draft LP Policy G5, the Urban Greening Factor (UGF) for the Detailed Area equates to 0.2. The method of calculating this and the specific demise used is set out in more detail in the landscaping chapter of the Design and Access Statement.

As part of the design evolution, the potential for Blocks 7 and 8, alongside Blocks 5, 6 and 9 to support biodiverse roofs on their upper-most levels was reviewed. However, due to the difficulties of providing safe and secure access for regular maintenance at that height, this was not considered possible. Accordingly, in accordance with Draft Policy, the provision proposed is considered the maximum level of urban greening that can be accommodated by the Site commensurate with its constraints and required level of access.

# 6.9.2 **Private Amenity Space and Play space**

NPPF paragraphs 96 and 97 explicitly resist the loss of recreation spaces and promote their delivery through the planning system. These paragraphs require new developments to incorporate both private and public open spaces for use by occupants.

Draft LP Policy S4 stipulates that residential developments should provide a net increase good quality, safely accessible open space and play. The Mayor's Housing SPG requires a minimum of 5sqm of outdoor open space per 1-2 bed unit with an additional square metre of space per every occupant.

Saved UDP Policy H10 sets out the aim for large housing developments to be provided with sufficient garden space for their residents. Whilst it does not provide detailed information about expected sizes, it does recognise the wider benefits that the provisions of gardens can bring to residents. On this basis, for developments inside the CAZ a minimum of a quarter of the proposed dwellings should have private amenity space in the form of balconies, terraces or gardens. Communal gardens are equally acceptable.

The importance of private amenity space is continued into Draft WCP Policy 13. Recognising however the constraints of the borough, the Draft Policy notes that where such space is not practicable dwellings should have additional internal living space equivalent to the external requirements; or the external requirement will be provided as communal external amenity space; or else the external requirement will be provided as public open space.

In terms of playspace, the Mayor's Housing SPG and London's Shaping Neighbourhoods Plan and Informal Recreation SPG (2012) notes that per child at least 10 square metres should be provided. These spaces should be stimulating and safe, located within neighbourhood and incorporate green spaces. This is reflected in Draft LP Policy S4 which requires play spaces to be designed so that they are overlooked, integrated into the neighbourhood design and not segregated by housing tenure.

Current WCP Policy S35 is relevant in this regard which recognises the importance of providing children's play space as way of increasing physical activity. The Draft WCP identifies the Site as being located in an area of play space deficiency. In this respect, Draft WCP Policy 35 states that major developments in such areas will be required to provide new or improved space for children's active play.

The quantum of play space to be provided per age group should be determined using the GLA's Playspace Calculator.

## Masterplan Strategy

As set out in the Design Code Chapters of the Design and Access Statement, the majority of residential units across the Masterplan will be provided with a policy compliant provision of outdoor open space. For those ground floor units, this will come in the form of terraces – located set back away from the main public highway to ensure privacy and defensible space. The majority of units on the upper floors will be provided with appropriately sized balconies.

As set out above in section 6.9.1, flexible and adaptable public open space was fundamental in the design evolution of the Proposed Development. This therefore influenced the final configuration and spacing of the Masterplan's development plots – with Block 5-9 along the eastern edge having a closer railway adjacency to ensure the public realm was genuinely optimised both in terms of size and quality. However, the result of this is that it is not considered practicable to provide a nominal number of residential units along the eastern elevations of these blocks with a policy compliant provision of private outdoor amenity. Final details will emerge as part of future RMAs however. Notwithstanding, the private open space strategy proposed still represents a substantial improvement beyond the existing, whereby whilst many of the existing units are accessed from external galleries, none have any dedicated outdoor private amenity space.

In addition to the provision of private outdoor open space per unit, residents in each block will also have access to communal private open spaces in the form of podium gardens and roof terraces. This will ensure all residents (even those few who will not be provided with private amenity spaces) will still have access to a high-quality provision of outdoor open space. This strategy is therefore in full accordance with Draft LP Policy S4, Saved UDP Policy H10 and Draft WCP Policy 13.

In terms of playspace, the strategy and distribution of playspace adopted across the Masterplan is set out in more detail in the landscape section of the Design and Access Statement. In summary however, given the constraints of the Site, the need to optimise residential densities alongside the requirement to maximise affordable housing, it has not been possible to adhere fully to the Mayor's Housing SPG requirement of 10sqm of playspace per child.

In this respect, Table 12 below sets out the GLA provision derived from their Playspace Calculator as based on the indicative Masterplan unit mix / tenure. This is set alongside the quantum of playspace being proposed. Whilst there is a noted shortfall against the GLA's requirements, as illustrated in Table 13 the proposed amount represents a substantial increase above the existing provision pursuant to the aged 0-11 play provision.

Age Group	GLA Provision	Masterplan Proposal
0-4 years	1,497sqm	1,721sqm
5-11 years	1,595sqm	730sqm
12+ years	1,330sqm	403sqm
TOTAL	4,422sqm	2,854sqm

# Table 12: Playspace required alongside playspace proposed

Table 13: Exist	ing playspace	alongside play	space proposed
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Age Group	Existing Playspace	Age Group	Masterplan Proposal
0-4	673sqm	0-3 years	1,721sqm
5-11	545sqm	4-10 years	730sqm
12-17	617sqm	11-17 years	403sqm
TOTAL	1,836sqm	Total	2,854sqm

Of the playspace types required in new developments, the Mayor's Play and Informal Recreation SPG places the biggest emphasis on the required provision for younger children - which should be closer to home so children and their families do not need to travel to reach it. Table 4.4 in the SPG notes the maximum walking distance to playspace for under 5s should be 100 metres; increasing to 400 metres for 5-11 year olds and 800 metres for children aged 12+.

In this respect, whilst it is accepted that the entirety of the GLA's playspace requirement cannot be met on-site, the provision of playspace and playable areas proposed have been increased substantially overall and redistributed so there is now a greater focus on play for the younger demographic. The play provision for children aged 0-4 years in particular will be delivered as a mix of formal play equipment alongside a comprehensive scheme of more informal playable landscaping. This will take the form of smooth boulders, raised walls and beams, textural planting and mounded lawns which will provide incremental play opportunities across the Masterplan. In accordance with Draft WCP Policy 35, this high quality and varied provision represents a substantial improvement above the existing play spaces within the estate.

Play for children aged 5-11 will be provided by way of more formal equipment distributed within the main squares across the Masterplan and the 12+ play provision will take the form of a flexible MUGA in the southern-most square. With respect to the MUGA, it is noted that the existing, which comprises a large

fenced area of hard standing, is larger than that being proposed. As part of the final landscape design, a survey was undertaken to identify the incidences and types of use of this space. This survey revealed that MUGA users were mostly children under 12 years of age, and in only very limited occurrences were teenagers. The type of play observed within this MUGA was also seen to be more informal, with no occurrences of 'sports' (basketball, five-aside football etc) recorded.

This indicates that a like-for like provision of a new MUGA within the Masterplan of a similar size, character and design as existing would not adequately support the local demand for more general space to socialise and play informal games. Accordingly, a conventional, dedicated sports court with limited alternative use other than a MUGA, would not be a successful use of available space. This shaped the design of the flexible MUGA proposed within the Masterplan – 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. This maximises the appeal of this space.

With specific regards to the play provision for children aged 12+, as set out in the landscape chapter of the Design and Access Statement play and sporting facilities in Battersea Park are within an acceptable walking distance of the Site. Further and as set out above, the Chelsea Barracks Leisure Centre due for completion in 2026 will provide further sporting and leisure opportunities for this demographic.

In summary therefore, all playspaces and equipment proposed across the Masterplan will be stimulating and safe; landscaped, fully overlooked and integrated into the development to encourage maximum use and interaction - in design terms, a considered improvement from the existing provision.

It should also be noted that all playspaces and playable landscape features provided at ground level will be accessible to and shared by all residents across the development rather than being specific to individual blocks or tenures. Playspace located on block podiums will be accessible to all residents within the respective blocks – again, regardless of tenure. The play provision proposed is therefore compliant with the objectives of Draft LP Policy S4, Current WCP Policy S35 and Draft WCP Policy 35.

# <u>Detailed Strategy</u>

In accordance with the Masterplan Strategy, the majority of units within Blocks 7 and 8 will be provided with the policy compliant provision of private outdoor open space in the form of terraces for the ground floor units and balconies for the upper floor units. On this basis, of the 226 units proposed 191 will have this provision and a further 6, whilst not having such a provision will be oversized with additional internal living space.

As set out above, the public open space strategy at ground floor level informed the final location and form of Blocks 7 and 8. Accordingly, this has resulted in a railway adjacency to these blocks which precludes the provision of policy compliant balconies to 29 units along their eastern elevations -a total of 13% of the unit provision across the Detailed Area. These units will however be provided with Juliet balconies comprising a minimum depth of 0.5m still allowing space for

occupants to stand outside. In line with the hierarchy set out in Draft WCP Policy 13, every resident in these blocks will also have access to both communal private gardens at podium level and rooftop terraces further up each block. In addition, the wider public squares throughout the development at street level will be open to all. This will ensure that those residents who are not provided with a policy compliant level of private amenity space will still have access to outdoor amenity. This is therefore considered a robust strategy, compliant with local policy.

The playspace provided within the Detailed Area will align with the Masterplan Strategy. As illustrated in the landscape chapter of the Design and Access Statement, within the building envelopes the focus will be on "doorstep play" for the younger demographics who are only able to travel shorter distances. Accordingly, a total of 324sqm of play for children ages 0 - 3 years old will be provided on the first floor podiums and 485sqm of playspace for children aged 4-10 will be provided in the centre of the new public square.

No playspace for children aged 12+ years will be provided within the Detailed Area. 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.

# 6.9.3 **Trees**

NPPF paragraph 170 recognises the wider natural capital and ecosystem benefits of trees and the overarching need to preserve and enhance biodiversity through development. Accordingly, where the loss of trees is concerned, the benefits of the development in that location should clearly outweigh the loss.

With regards to trees, both Current LP Policy 7.21 and Draft LP Policy G7 note the importance of protecting London's existing tree provision. If tree removal is required, there should be adequate replacements based on existing value of the benefits of the trees removed. The planting of additional trees should be included in new developments. In the supporting text of Draft LP Policy G7 specifically, it states that the Mayor wants to increase tree coverage in London by 10 percent by 2050.

Draft WCP Policy 35 echoes the LP's approach, highlighting WCC's objective to 'green' Westminster through, for example, additional tree planting. This would not just have positive amenity impacts but also wider ecological benefits.

# Masterplan Strategy

As set out in more detail in the Landscape section of the Design and Access Statement and in the submitted Arboricultural Report and Tree Survey (Ref. EBR-10), a total of 26 out of the existing 32 trees across the Site are proposed for removal in order to facilitate the renewal – alongside a further tree (T39) just beyond the Site boundary to the north east. This will leave 6 trees existing within the Application red line which, comprising 5 Category B trees and 1 Category C tree, will be integrated into the proposal. During construction, these trees will be protected from harm in accordance with BS5837 2012, as noted in more detail in the submitted Tree Survey. Whilst the proposed tree loss is noted as being unfortunate, attempts were made as part of the design to retain as many as possible. However it was considered ultimately that the configuration of the existing tree provision across the estate would not have otherwise allowed for the comprehensive redevelopment now proposed.

Indeed, removing these trees allows for the creation of sensitively placed buildings, high quality open spaces and legible connections which, themselves can be designed with use-specific landscaping and planting that will reinforce the open space hierarchy. This will ultimately result in a far higher quality proposal with a substantially increased ecological value. In this respect, a total of 229 new trees are proposed across the illustrative Masterplan which represents a circa 630% increase in tree planting – exceeding the tree coverage increases aspired by Draft LP Policy G7. On balance therefore, it is considered the tree strategy is policy compliant.

It should be noted in this instant that whilst the final tree proposals and tree placements will crystallise with subsequent Reserved Matters submissions, this submission seeks to establish the baseline principle of the removal of a maximum of 26 trees across the site – to be replaced with an extensive tree planting strategy.

## Detailed Strategy

There are a total of 7 trees within the Detailed Area demise which comprises 1 Category A tree, 4 Category B trees and 2 Category C trees. It is proposed to remove 5 of these trees (1 Category A; 2 Category B; and 2 Category C) and replace them with 47 new trees. A cumulative total of 49 trees will therefore be located within the Detailed Area.

As set out above in the Masterplan strategy, whilst the level of tree removal is noted as being unfortunate, it allows for far more flexibility to create the highest quality public realm. In this respect, particular focus was given to the existing Category A tree (T18) which is proposed for removal. Within the context of the Detailed Area, this tree would be located to the south-edge of the square within the vehicle circulation area. In this location, the vehicle routes are designed to support the tracking of vehicles up to 12 metre long associated with servicing and deliveries. As such, whilst fundamentally a Homezone which prioritises pedestrians and cycles, the landscape finishes will still have to be as such to withstand traffic loads. This would require such paved surfaces across the entire root protection network of T18. A degree of height clearance would also be required which T18, by way of its low lying limbs, would not otherwise allow without a fair degree of pruning.

Below ground, the paved threshold around the square is under sailed by significant new underground utilities and attenuation tanks which provide infrastructure to support the new buildings. These below ground elements would provide a further hinderance to the root protection area. As such, the removal of T18 to facilitate the Detailed Area is required.

In this respect, the 600% increase in tree planting proposed across the Detailed Area offsets the short terms harms associated with the above mentioned tree removals. As set out in the Design and Access Statement, the tree planting proposed within the Detailed Area is as such to highlight the routes into and out of the square; demarcating the hierarchy of the spaces proposed; and providing shading, amenity and ecological enhancements such as bat and bird boxes. Such ecological and placemaking benefits would not have been possible if the existing trees across the site were to be retained. On balance therefore and in line with national, regional and local policy, it is considered that the tree strategy proposed would deliver far reaching benefits and a substantial improvement on the current position.

# 6.10 Heritage and Archaeology

The NPPF recognises the significance of a heritage asset as a material planning consideration. Paragraph 193 states that there should be weight given to the conservation of designated heritage assets; the more important the asset, the greater the weight should be. Paragraph 194 stipulates that any harm to or loss of the significance of a designated heritage asset must be supported by a "clear and convincing justification" with approval only being granted should the wider benefits clearly outweigh the harms.

Aligning with the NPPF, Current LP Policy 7.8. Draft LP Policy HC1, Current WCP Policy S25 and Draft WCP Policy 40 all require development proposals to conserve, enhance, be sympathetic to, and not detract from the enjoyment of the historic environment. This should be of a level proportionate to the significance of each asset and their respective setting. Additionally, development should also not detract from the enjoyment and experience of designated views (whether strategic or local).

With regards to tall buildings, Draft LP Policy D9 states that such development should take account of, and avoid harm to the significance of London's heritage assets and their settings. Proposals that may result in harm will require clear justifications.

This is reiterated by Draft WCP Policy 43 which notes that, specific to estate regeneration proposals, appropriate building heights must be balanced against the wider public benefits of such a scheme. At the Ebury Bridge Estate it is noted in policy that there are opportunities for taller buildings though they must be respectful of the surrounding heritage constraints - having the tallest elements towards the north and stepping down in height to the south.

Specific to developments that may result in archaeological impacts, Draft LP Policy HC1 states that archaeological assessments should be used to avoid or minimise harm through design and appropriate mitigation. As the application site lies within an Archaeological Priority Area (Tier III), Draft WCP Policy 40 requires a full archaeological evaluation to be undertaken.

# <u>Masterplan Strategy</u>

Whilst the Site itself is not a nationally or locally recognised heritage asset, it is immediately bounded to its north west edge by the Belgravia Conservation Area. The Peabody Avenue Conservation Area lies approximately 150m to the east, on

the other side of the rail tracks to the Proposed Development, and adjacent to this is the Pimlico Conservation Area.

There are no listed buildings on the site, but there are a large number of Grade I, II and II\* listed buildings within 500m. The closest of these include:

- 20 to 42 (Even) Ebury Bridge Road including garden railings (Grade II) immediately to the west;
- The Royal Hospital (Grade I) to the south-west;
- St Barnabas parsonage and war memorial (Grade II) 180m to the north-west;
- Church of St Barnabas (Grade I) 190m to the north-west;
- White Ferry House Public House (Grade II) 190m to the east;
- Fountain on the east side of junction with Avery Farm Row (Grade II) 190m to the north;
- Guard's Chapel and former Chelsea Barracks (Grade II) 200m to the west; and
- 40-45 Bloomfield Terrace (Grade II) 200m to the west.

Given this range of heritage constraints, the strategy towards minimising undue harm and mitigating adverse impacts has been managed at a Masterplan level rather than within the separate parameters of the Outline Area and Detailed Area. Accordingly, the archaeology strategy is set out in Volume 1 of the submitted Environmental Statement (EBR-13) and the Heritage, Townscape and Visual Impact Assessment (HTVIA) is included within Volume 2.

As set out in section 6.8.2 above, the Masterplan heights, layout and envisaged materiality have been designed with due consideration to the surrounding conservation areas and listed buildings. In accordance with Draft WCP Policy 40, the taller buildings along the eastern edge adjacent to the railway step down from the north to the south. Along the western edge of the Site, immediately adjacent to the Belgravia Conservation Area and the Site's nearest Listed Building, Blocks 1-4 will comprise a different built typology; both in materiality and in height. These buildings will be the lowest structures proposed across the development with heights onto Ebury Bridge Road of circa 6 storeys, stepping up to 8 storeys to the rear. This will ensure the proposal does not detrimentally impact on the setting of the adjacent heritage assets.

In this respect, using verified views in the form of renders and wirelines the HTVIA assessed the visual impacts of the development on views from and of heritage assets surrounding the Site. From this, it concluded that out of 26 views assessed, 25 confirm the proposed development as that of an appropriate scale that responds well to the local context – with the taller buildings contributing to the local area as positive townscape markers. Only in one view (from the Pimlico Conservation Area) was the proposed development considered to have an adverse effect. Assessments also noted that the proposed development would be seen from the Grade I Listed Royal Hospital Grounds and gardens. However, as this visibility is limited even in the winter through thick branches, there is no considered harm to the significance of this asset.

It is however noted that the proposal will result in a low degree of "less than substantial harm" to the Grade II listed National Audit Office, in so far as a minor, secondary view from Chelsea Bridge Road would now be lost. The group of nondesignated assets on Westmoreland Place would also experience a similar level of harm as two buildings of the Masterplan would now be seen in their setting, though the high level of architectural design proposed would ensure impacts remain at a low level harm. In this respect paragraphs 196 and 197 in the NPPF are relevant, which state that any harms caused to designated or non-designated heritage assets should be weighed not just alongside the weight, and level of impacts on the historic designations themselves, but also alongside the wider public benefits of the proposal. From this, a balanced judgement should then be made which considers if said benefits outweigh the harms. In this respect, the HTVIA concludes that with regards to this proposal, the wider benefits (summarised in the Conclusion to this Planning Statement) do outweigh these harms in accordance with policy.

With regards to archaeology, the respective chapter in the Environmental Statement outlines the methodology, baseline conditions and likely effects of the proposed development associated with its construction and existence (impacts caused by operation were scoped out). This chapter was informed through pre-application discussions with the Greater London Archaeological Advisory Service (GLAAS).

In all, it is considered that there is the potential for previously unknown archaeological assets to exist beneath the Site based on an understanding of the its context and history and following the carrying out of a desk-based assessment (included at Appendix C2 of the Environmental Statement). As such, a mitigation strategy has been developed (included in Appendix C3 of the Environmental Statement) that confirms to standard practices for developments of this scale in Westminster and Greater London. This mitigation strategy, to be included as part of a future Planning Condition, will ensure that through construction and existence, the presence of any archaeological remains will be monitored and that, where such features are found to exist, any resulting impacts will be nonsignificant.

# 6.11 Transport

# 6.11.1 Access

Section 9 in the NPPF sets out the importance of developments encouraging and facilitating an increase in the use of and access to sustainable transport methods. To this degree, Current LP Policies 6.10, 6.11 and 6.12 are relevant and highlight the need to prioritise the provision of a high quality pedestrian environment. Pavements should be decluttered, fully accessible and where appropriate, adhere to "shared space principles". Streets and roads should be designed and laid out to ensure that the needs of the respective street users and surrounding public realm are dealt with in a coordinated way. This is reinforced in Draft LP Policy T1 which highlights the needs for development to make the most effective use of

land, reflecting its accessibility to existing and future public transport and walking and cycling routes.

Draft WCP Policy 25 reflects national and London-wide policy, requiring development to be located and designed in a way that maximises sustainable forms of travel. The Council will support the reallocation of road and development space where it promotes walking, cycling and access to public transport. In this respect, the 'pedestrian first' approach is carried through from Current Policy into the Draft WCP. This seeks the provision of high quality walking and cycling infrastructure to enable a shift of focus away from the private car.

With regards to deliveries and services, Draft LP Policy T7, Current WCP Policy S42 and Draft WCP Policy 30 all recognize the need for infrastructure to be incorporated into developments to allow them to operate and be maintained efficiently and with minimal disruption. If such facilities cannot be incorporated, the proposal must find alternatives that minimize adverse effects on public realm users.

## Masterplan Strategy

The Access and Circulation Parameter Plan (Ref: 011220) illustrates the new network of circulation routes proposed across the Site alongside the type of user who can take advantage of them. The access strategy has been designed primarily at a Masterplan level in order to ensure the routes proposed are cohesive and maximise connections and accessibility and should be read alongside the submitted Transport Assessment (Ref. EBR-08) and its appendices

As illustrated in the Access and Circulation Parameter Plan, there is a comprehensive network of cycle and pedestrian routes across the length of the Proposed Development, which can take full advantage of a total of eight entrance points. This will enhance the Site's connectivity to the amenities in the wider area, whilst also opening it up for use by residents within the wider neighbourhood as a place to relax and socialise. This strategy is therefore in accordance with Draft LP Policy T1 and TfL's "Healthy Streets" approach which seeks to prioritise active and sustainable travel modes.

There is a provision for access to the Proposed Development by vehicles for reasons of accessibility for less mobile residents, servicing and deliveries in full accordance with policy. However, whilst the current estate has designated road space reserved for vehicles, the proposal will integrate into its design Homezone "shared space principles" whereby pedestrians and cyclists will be prioritised in an environment with reduced clutter and improved soft and hard landscaping– as set out in more detail in the Design Code Chapters of the Design and Access Statement. The accessibility strategy across the Masterplan is therefore in full accordance with Current LP Policies 6.10, 6.11 and 6.12 and Draft WCP Policy 25.

# Detailed Strategy

Focussing on the Detailed Area, Blocks 7 and 8 have key locations within the Masterplan, fronting onto one of the two squares proposed to benefit from full

vehicular access and rotational circulation. As noted above however and as illustrated in the Detailed Area drawing pack, this square will also be designed to prioritise pedestrians and cyclists – utilising landscaping and materials that delineate the area primarily as public open space rather than roadway. This will avoid any potential severance caused by designated roadways whilst also maximising the use of the Site for open space, play space and landscaping. In this respect, the processes in place to manage cars, deliveries and servicing vehicles entering the Site is included within the Delivery Servicing Plan and Car Parking Design and Management Plan appended to the submitted Transport Assessment.

# 6.11.2 Car Parking

Current LP Policy 6.13 stipulates the need for a balance to be struck when providing car parking to ensure that more sustainable forms of transport are still desirable and not undermined. Supporting Table 6.2 sets out the basis for car parking for residential developments which, if located in a central area with a PTAL 6, would require all units to be provided with a maximum of one space each.

However, with a view to shifting towards more sustainable travel patterns the Draft LP has reviewed this position - with Draft LP Policy T6 stating that in this central London highly accessible context, car-free development should be the starting point. Residential and retail developments within the CAZ should be car free as standard. This is the standard also reiterated in Appendix 2 of the Draft WCP.

For residential developments, Draft LP Policy T6.1 requires that, for 3% of dwellings, at least one designated disabled persons parking bay should be supplied (as 'active parking spaces'). Unless agreed otherwise through ongoing consultation, developers should also demonstrate provision for a further 7% of dwellings to be provided with a disabled persons parking spaces should they be required in future (as 'passive parking spaces'). Draft WCP Policy 28 aligns with the above standards.

In terms of electric vehicle charging points, Draft LP Policy T6.1 states that at least 20% of spaces provide should have active facilities with the remaining spaces including a passive provision. Draft WCP Policy 28 however goes further, noting that for developments in "Parking Zone B" (in which, the Ebury Estate is located) 50% of the spaces provided should be equipped with active vehicle charging points with the remaining 50% incorporating a passive provision.

In terms of car club membership, again for developments in "Parking Zone B", Draft WCP Policy 28 notes that such schemes should be provided for all residents where on-site parking is delivered.

# <u>Masterplan Strategy</u>

As required by both London policy and local policy, given the Ebury Estate's excellent accessibility to public transport and its central location, the Masterplan Strategy will be for a car free scheme as standard. The only car parking spaces provided will be those for use by disabled residents. In this respect, we

acknowledge the position of Draft LP Policy T6.1 which requires a 3% provision from the outset with design allowing for a further 7% of spaces to be provided if required – up to a total of 10%.

The Masterplan Strategy is to provide disabled parking spaces for 5.5% of the residential units proposed from the outset. This active provision exceeds the minimum 3% outset provision required by policy. On the basis of the indicative 758 units proposed across the Masterplan, this equates to a total of 42 car parking spaces. These spaces will be located within the podiums of Blocks 5-9 to the eastern edge of the Site and will be available to all residents who require them.

However, in this respect the constraints of the Site should be noted whereby, alongside the provision of additional housing stock, landscaping design has been a key focus with a view to creating the highest quality public realm. In order to be fully policy compliant, the landscaping would have to be designed to accommodate further passive car parking spaces for 4.5% of the units proposed which equates to an additional 34 spaces. Programming this into the Proposed Development would substantially prejudice the quality of the wider landscape, which seeks to maximise open space, greening and connectivity.

TfL have been consulted with comprehensively as part of the evolution of the proposal. With respect to car parking, on 25<sup>th</sup> February 2020 they confirmed via email that, considering the Site's constraints alongside the overprovision of disabled parking spaces provided from the outset, the provision of active parking spaces with no passive spaces would be acceptable. On this basis and as noted above, active disabled car parking spaces will be provided only for 5.5% of residential units.

In accordance with Draft WCP Policy 28 50% of all parking provided across the Masterplan will be equipped with electric vehicle charging points with all remaining bays being equipped with a passive provision. This exceeds the minimum 20% active provision required by Draft LP Policy T6.1.

# <u>Detailed Strategy</u>

A total of 5.5% of units across the Masterplan will be provided with a disabled parking bays, which will be constructed within the building envelopes so as they do not intrude into the public realm. Accordingly, the podium between Blocks 7 and 8 within the Detailed Area will accommodate a proportion of these spaces - a total of 18, though due to their location two of these will only come into use following the construction of the adjacent Block 9. As above, these spaces will be available not just to residents within Blocks 7 and 8, but to the residents across the entirety of the Masterplan. 50% will be provided with active electric vehicle charging points with the remaining including a passive provision.

In accordance with policy above and in agreement with TfL, the remaining car parking spaces required to establish the 5.5% provision across the Masterplan will crystallise with subsequent Reserved Matters Applications.

# 6.11.3 Cycle Parking

As part of promoting sustainable transport through the planning system, NPPF paragraph 104 sets out that planning policy should support cycle parking facilities.

Current LP Policies 6.9 and 6.13 similarly push the importance of encouraging the attractiveness of more sustainable forms of transport such as cycling. Accordingly, new developments should provide secure, integrated and convenient cycle parking facilities relative to the development size and unit mix. The resulting provision per development is reiterated in Standard 20 of the Mayor's Housing SPG.

The Draft LP, however, takes a stronger stance, with Draft Policy T5 increasing the required cycle provision per development to be in line with the following:

- 1 space per studio or 1 person, 1 bedroom dwelling
- 1.5 spaces per 2 person, 1 bedroom dwelling
- 2 spaces per all other dwellings

Cycle parking should be provided in line with the London Cycling Design Standards which also requires 5% of all spaces to be designed for "non standard" bikes. This parking provision can take the form of Sheffield Stands. For major developments, short stay cycle parking should also be provided at one space per 40 dwellings.

Table 10.2 within Draft LP Policy T5 illustrates the minimum number of cycle spaces required for any new non-residential provision. The number of cycle spaces required is pursuant to the size and use of each non-residential

# Masterplan Strategy

As set out in the submitted Design and Access Statement and Transport Assessment, cycle parking for residents across the Masterplan will be provided in secure stores within each block. Only block residents will have access to their respective cycle stores with an emerging policy compliant number of spaces provided commensurate with each block's dwelling mix. On this basis, and in line with the indicative dwelling mix proposed for the 758 units across the Masterplan, Table 14 below sets out the pursuant cycle provision required by block.

Table 14:	Indicative	cycle	parking	provision	across	Masterplan
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Block	B1	B2	<b>B3</b>	<b>B4</b>	B5	<b>B6</b>	<b>B</b> 7	<b>B8</b>	<b>B9</b>	TOTAL
Spaces	78	80	83	77	167	206	207	212	260	1,370

In addition to the above, 132 cycle spaces for visitors (101 to serve the 3,018sqm retail provision and 31 for the residential units) will be provided across the Sire's public realm in the form of Sheffield Stands. This substantially exceeds minimum Draft LP Policy T5 requirements.

Whilst the final form of the non-residential floorspace will crystallise as part of forthcoming Reserved Matters Applications, the maximum floor areas being

applied for will also generate a need for 31 long stay cycle spaces for staff. These will be provided within the demises of each respective commercial unit as required.

The Masterplan Strategy for cycle parking reinforces the importance of this development encouraging the use of sustainable transport methods, and is fully compliant with both adopted and emerging policy.

In addition to the above, there have been ongoing discussions with TfL pursuant to the expansion of the 26 space Cycle Hire Docking Station that currently exists to the north of the Site on Ebury Bridge Road. This expansion will take the form of a new docking station, comprising 12 spaces, to be positioned adjacent to the existing facility. This will further encourage residents and visitors to utilise more sustainable forms of public transport.

## Detailed Strategy

In accordance with the Masterplan strategy, Blocks 7 and 8 will each have their own private integrated cycle stores equipped with a provision of cycle spaces that is commensurate to their respective dwelling mixes.

Table 15 below sets out the minimum policy compliant cycle parking provisions required in Blocks 7 and 8 given the dwelling mix proposed.

	1 bed	2 bed	3 bed	4 bed	5 bed	TOTAL
Block 7	35	49	26	2	0	112
Cycle spaces	53	98	52	4	0	207
Block 8	33	51	25	4	1	114
Cycle spaces	50	102	50	8	2	212

 Table 15: Cycle parking requirement for Blocks 7 and 8

As noted above, given the unit mixes proposed, Block 7 will require 207 cycle spaces and Block 8 will require 212 – and is subsequently what is being provided in accordance with policy. Of this provision, 5% will be delivered in the form of Sheffield Stands to allow for non-standard cycles. These will be provided in secure stores within these blocks at ground and basement level, and will be otherwise accessible only to respective block residents.

Within the public realm being delivered as part of the Detailed Area, 10 cycle spaces are proposed as visitor parking for residents. This parking, provided as Sheffield Stands, will be integrated into the public square landscaping.

# 6.12 Energy and Sustainability

Sustainable development is the core principle underlying the spatial planning system and is promoted across the NPPF. Accordingly, environmental sustainability forms one of the three overarching objectives of the system. This principle involves minimising waste and pollution and adapting to climate change, including moving to a low carbon economy.

Current LP Policies 5.2, 5.3 and 5.7 require new developments to minimise carbon dioxide emissions, make efficient use all of natural resources and maximise, both during construction and operation of the development, opportunities for recycling and reuse of materials. Evolving from this, Draft LP Policy GG6 necessitates development to improve energy efficiency and support the move towards a low carbon economy, contributing towards London becoming a zero-carbon city by 2050.

Building on Current LP Policy 5.2 'Minimising Carbon Dioxide emissions', Draft LP Policy SI 2 requires all major developments to be net zero carbon, demonstrated via an energy strategy. There should be at least a 35% carbon reduction on-site, while 10% and 15% reductions should be achieved through energy efficiency measures in residential and non-residential developments respectively. Any shortfall in carbon reductions should be compensated by commuted payments or offsite initiatives. For schemes referred to the Mayor, proposals should provide a Life-Cycle Carbon Assessment.

On building materials, Draft LP Policy SI 7 and Current WCP Policy S28 promote a circular economy approach where waste minimisation and recycling is integrated into the construction process. For major developments referable to the Mayor, Draft LP Policy SI 7 requires proposals to aim to be net zero in terms of waste.

Both Draft LP Policy SI 2 and Current WCP Policy S40 promote the maximisation of renewable energy sources on-site. The use of renewable energy opportunities and domestic energy efficiency is also encouraged in Draft WCP Policy 13.

A key part of this is the avoidance of an overreliance on unsustainable methods of energy generation with a view towards energy efficient living; and the creation of homes which, more generally, are suitably insulated against undue external noise sources; protected from lower levels of external air quality; and designed to avoid overheating without reliance on air conditioning units. This is a point noted by Draft WCP Policy 13.

# <u>Masterplan Strategy</u>

The integration of sustainability and energy efficiency into the Masterplan has been carefully considered throughout the design process to ensure that it makes the fullest contribution to the mitigation of, and adaption to, climate change, energy usage, and resource wastage, whilst minimising carbon dioxide emissions.

Details of the measures to be utilised Masterplan wide, both through development demolition, construction and operation are illustrated in the submitted Energy and

Sustainability Statement (Ref. EBR-09) and, where relevant, in the Design and Access Statement and Design Code Chapters. From a sustainability perspective, such measures include the prioritisation of sustainable transport through the provision of car parking only for "White Badge" carriers; buildings that incorporate a high degree of insulation and materiality to protect residents from undue external noise levels and adverse air quality impacts; and a design that seeks to mitigate overheating in line with the Current London Plan's cooling hierarchy. With specific respect to cooling and overheating, an active cooling system is proposed across all buildings alongside openable windows. This will allow residents the choice between:

- Natural ventilation during times of day where external noise is less severe. The new units are designed such that with opening windows, they pass the CIBSE TM59 overheating assessment.
- Active cooling to allow residents to be both acoustically and thermally comfortable, particularly at night, or when external noise is more severe. The active cooling system will provide 'comfort cooling.

In addition to the above, energy monitoring will be utilised throughout; and photovoltaic cells and biodiverse roofs are envisaged on Blocks 1-4 In addition, the Site as a whole is targeting BREEAM Communities Excellent.

Also included within the Energy and Sustainability Statement are details of the proposed energy strategy for the new Masterplan. In summary, this will involve two energy centres across the Site (in Blocks 6 and 7) envisaged to each serve half the development. These centres will encompass an open loop ground source heat pump at basement level alongside a two stage air source heat pump at roof level with a view to providing the Site's heating and cooling needs.

For efficiency reasons, the preference is for the ground source heat pump to provide the majority of the development's hot and chilled water demands with the air source pumps only providing residual need. Test wells are however being reviewed to assess the capacity of this. If primary reliance on ground source is not possible, then the air source system will be enhanced to meet the entire heating and cooling load.

In line with Draft LP Policy SI2 and to allow flex for either energy strategy to be implemented dependent on the outcome of the test wells, the submitted Energy and Sustainability Statement assess both energy options against the energy hierarchy of Be Lean, Be Clean, Be Green, Be Seen.

# **Detailed** Strategy

In line with the above Masterplan strategy for energy and sustainability, the submitted Energy and Sustainability Statement (Ref: EBR-09) includes more comprehensive and refined details of how these principles have both shaped, and been incorporated into the design of Blocks 7 and 8. As a result of these measures, the Energy and Sustainability also sets out the resulting regulated carbon dioxide savings at each stage of the Be Lean, Be Clean, Be Green, Be Seen energy hierarchy.

In summary, the key sustainability and energy saving measures to be incorporated into the Detailed Area are:

- Measures and devices installed in the proposed dwellings to achieve a maximum daily water usage of 105 litres, per person per day, with drought resistant planting prioritised within the landscaping to mitigate the need for external irrigation.
- A design that takes into account resilience against future climate and needs of the community, with adaptable infrastructure and management designed to protect from flooding, and respond to heat waves and water shortages.
- Sustainable transport modes encouraged with the provision of a sufficient quantum of cycle storage spaces for both residents and visitors, alongside electric car charging points for vehicles.
- Ecological enhancements incorporated into the design to improve ecological resilience and to seek to achieve a biodiversity net gain for the Site.
- Installation of smart metres in every property to monitor energy and water usage.
- Sustainable Urban Drainage Systems incorporated into the scheme, both across the roof gardens and podium and also within the public square. This will help to attenuate surface water whilst encouraging biodiversity.
- Provision of facilities for residential, non-residential and construction related waste.
- 90% of the new dwellings designed to meet Building Regulations Approved Document M4(2) and 10% will meet Part M4(3).
- Ecological enhancements implemented through the provision of areas of green roofs, private amenity space, tree planting and surrounding landscaped areas. This will improve ecological resilience and to seek to achieve a biodiversity net gain for the Site.
- Openable windows alongside an active cooling system to allow residents a choice on the type of ventilation they prefer.
- All homes to be provided with mechanical supply and extract ventilation systems (with air filters) with heat recovery to control the source of air inputs, moisture and to recover heat. This will allow the new homes to be air quality positive.

As noted in the previous section, Block 7 will also contain one of two energy centres proposed across the Masterplan. It will take the form of ground source plant located in the basement spaces and an air source pump on the building's roof, and will be designed to plug into surrounding blocks as they crystallise.

As part of this submission, a Whole Life-Cycle Carbon Assessment and Circular Economy Statement has been undertaken to better understand the embodied

carbon usage at each stage of the development's life. Accordingly, with the above measures in mind,

the 30-years cumulative carbon shortfall for the development has been calculated at 2,978 tCO<sub>2</sub>. Associated with the domestic development only with a £95 per tonne CO<sub>2</sub> carbon offset price, this translates to a total cash-in-lieu payment of £282,928. The non-domestic development is expected to surpass the GLA's target of 35% carbon reduction and therefore no carbon offset is needed. This will be secured as part of the Hybrid Outline Application's Unilateral Undertaking Agreement.

# 6.13 Flooding and Drainage

The NPPF seeks to address the challenge of climate change and flooding. Where development is necessary in areas at highest existing or present risk of flooding, Paragraph 155 requires development to be made safe for its lifetime without increasing flood risk elsewhere.

Supplementary to this, Current LP Policies 5.12 and 5.13, development proposals must have regard to the measures proposed in the Thames Estuary 2100 and Catchment Flood Management Plan. New development should utilise sustainable urban drainage systems (SuDs) and should aim to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible. These principles are carried through into both Draft LP policies SI 12 and SI 13, and also into Draft WCP Policy 36 – which requires developments to be flood safe over their lifespan. Major developments and those in areas at risk of flooding must submit a Flood Risk Assessment.

# Masterplan Strategy

Whilst it benefits from flood defences, the Site is located within a Flood Zone 3. As such, a Flood Risk Assessment and Drainage Strategy (Ref. EBR-07) has been compiled and submitted with this Hybrid Outline Application which sets out the mitigation measures that will be employed across the Site to ensure any risk of flooding is minimal. This includes a comprehensive sustainable urban drainage system (SuDS) that comprises blue roofs at podium level, rain gardens, rainwater harvesting facilities and geo-cellular tanks.

These systems in place will allow storm water to be attenuated on site before being discharged into the existing public surface water sewer network. The proposed discharge rate from the site will be limited to 51/s per hectare in accordance with Thames Water requirements and will provide resilience up to and including the 1 in 100 year storm event plus 40% climate change.

The Site is therefore considered at low risk of flooding from all sources for the duration of its life and, with the SuDS and attenuation features in place, will not increase the risk of flooding to other sites.

# Detailed Strategy

As set out in the Landscape Section of the Design and Access Statement and the Flood Risk Assessment, Blocks 7 and 8 alongside the main square also included

within the Detailed Area include a number of mitigation measures to manage surface water runoff. This includes the provision of green roofs, on-street landscaping and, landscaped podium decks and roof gardens.

Cumulatively and as concluded by the submitted Flood Risk Assessment, it is considered that the Detailed Area as proposed would sufficiently mitigate the risk of flooding whilst attenuating surface run off and discharge. In accordance with policy, it protects downstream development from flooding by taking out a portion of unattenuated flow from the current combined sewer system.

# 6.14 Fire Strategy

The development would be subject to the statutory requirements of the Building Regulations 2010. In this respect, any buildings constructed across the Masterplan are to meet the functional requirements of Part B of Schedule 1 of these Regulations. These requirements cover:

- Means of escape;
- Internal fire spread (linings and wall coverings);
- Internal fire spread (structure);
- External fire spread;
- Access and facilities for fire services

Draft LP Policy D12 stipulates that proposals must achieve the highest standards of fire safety. This is to be achieved by providing unobstructed outdoor space; a means of escape and access for firefighting; and the inclusion of features that reduce risk to life through the slowing of fire spread. Proposals for major developments must supply a Fire Statement that includes a robust evacuation strategy.

# **Outline Strategy**

In accordance with the Draft LP, a comprehensive Fire Strategy (EBR-11) has been submitted with the Hybrid Outline Application which, pursuant to the Outline Area, illustrates the road layouts proposed sufficient to allow fire service access to the Proposed Development.

# Detailed Strategy

The submitted Fire Strategy referenced above provides extensive detail of how the design and materiality of the Blocks 7 and 8 and their immediate contexts have been designed with a view to covering the requirements of Part B, Schedule 1 of the Building Regulations 2010.

# 7 Unilateral Undertaking Heads of Terms

Parts 122 and 123 of the CIL Regulations 2010 require any planning obligations imposed to be necessary to make the development acceptable in planning terms. They must be directly related to the development, and fairly and reasonably related in scale and kind.

Thus in accordance with this and in line with Current LP Policy 8.2, Draft LP Policy DF1 and the "Infrastructure and Development Impacts" chapter of the Current WCP, the Applicant would welcome the opportunity to enter into discussions with WCC on the appropriate planning obligations necessary to mitigate the impact of the Proposed Development.

To inform these discussions and in line with our understanding of the site and its wider context, impacts, opportunities and constraints, we set out below a list of Draft Unilateral Undertaking Heads of Terms and pursuant commitments:

# **Affordable Housing**

• Ensure the delivery of a suitable and agreed upon number / percentage of affordable units / habitable rooms.

# **Transport and Highways**

- Provision of a final Travel Plan.
- Car Club membership for residents.
- Payment to TfL for delivery of a Cycle Docking Station.
- Walkway Agreement to safeguard a publicly accessible through route.
- S278 for associated highway works (access, parking bay/bus stop relocation).

# **Employment and Training Opportunities**

• Agreement to a employment and training opportunities strategy.

# **Community Uses**

• The provision of a dedicated community facility.

# Sustainability

• Pay cash in lieu contributions towards carbon emissions pursuant to the Detailed Area with future cash in lieu contributions charged at £95 per tonne.

# 8 Conclusion

This Hybrid Outline Planning Application will provide the strategic framework that establishes the principles of the redevelopment of the Ebury Bridge Estate. It would facilitate the creation of a sustainable, high quality new neighbourhood that would cater to both existing and new residents

In the lead up to this submission, engagement with local residents and community groups was been extensive and ongoing. In line with consultation aims set out in the submitted Statement of Community Involvement, it took the form of meetings, surveys and public consultations, which were structured around the need to raise awareness of the project; whilst also ensuring residents' aspirations were met and that support, where required, was readily available. Across the breadth of the engagement process, the support aired for the renewal project was widespread with comments received fully considered in the evolving design.

With the previous 2016 Full Application for the partial renewal of the Ebury Bridge Estate unimplemented and since expired, there continues to be recognition of the opportunities the Site can offer. This is demonstrated by emerging policies within the Draft Westminster City Plan that now reference the Ebury Bridge Estate specifically – noting the substantial appetite for widespread enhancement in the interests of both improving on the existing built environment and increasing overall housing supply.

In response to this, the Masterplan proposed seeks to create a legible and accessible mixed-use neighbourhood that is focussed around a series of four interconnected public squares. These squares are connected to the surrounding streetscape through a network of pedestrian and vehicle links to the west; and from more formal "gateways" to the north and south. This will ensure the proposal integrates seamlessly into the existing surrounding street network, where currently it is disconnected and isolated. The open spaces themselves will be landscaped to reflect their functions; with playspace, trees, shrubs and materials sensitively selected to maximise biodiversity net gain, drainage, amenity and accessibility. This will ensure the open spaces and MUGA proposed deliver a far greater social and environmental contribution than the existing.

The residential component will comprise an indicative 758 homes, which will comprise the replacement of the 336 homes currently on site alongside an uplift of 422. Being delivered as a mix of sizes of which more than 50% will be affordable, this provision will not only allow all existing residents the opportunity to stay on the Site, but it will also facilitate a substantial uplift of affordable housing overall. With a tenure blind approach to design, it will support the creation of a genuinely mixed and balanced community.

In this respect, the densities now proposed represent an increase above the existing estate. However, given the Site's excellent transport links and its central location adjacent to the Victoria Opportunity Area, this increase is considered appropriate. Not only will it contribute towards meeting Westminster's housing priorities but it will also act as a catalyst, spurring on further investment in the opportunity area itself. Additionally, when read alongside the surrounding

developments of Grosvenor Waterside and the Chelsea Barracks, this estate serves as one of the final pieces in the regeneration of this side of Victoria.

Alongside the residential element, up to 3,018sqm of non-residential floorspace is proposed along key frontages. The exact demises of each use will emerge with subsequent Reserved Matters submissions, though as a minimum a substantial increase in quantum and quality of community floorspace is committed to alongside an increase in workspace, retail and commercial opportunities. This maintains and compliments the estate's location as part of the Ebury Local Centre whilst also providing key facilities for estate residents and neighbours.

In terms of built form, two key typologies are proposed which will reflect the varied heights and characters of the surrounding context. Blocks 1 - 4 adjacent to Ebury Bridge Road and the Belgravia Conservation Area adopt the building heights of the immediate context, with footprints that maximise active facades within the wider public realm. Conversely, Blocks 5 - 9 along the western boundary of the Site are taller and more slender, taking full advantage of the openness presented by the adjacent railway to deliver new homes. The configuration of these buildings, with their narrowest facades facing outwards and each with three subsequent shoulder heights, have been designed to ensure the visual impact of bulk from beyond the Proposed Development is minimised whilst sunlight and daylight into the estate itself is maximised.

Sitting within the Masterplan framework and being sought in detail as part of this Hybrid Outline Application are Blocks 7 and 8 and one of the four public squares. Comprising a combined 226 residential units, these blocks sit at 18 and 17 storeys respectively, the second tallest proposed across the Masterplan. Such height is required in order to maximise the uplift of both affordable and private homes sufficient to make the renewal of the Ebury Bridge Estate viable, whilst at the same time optimising the provision of open space and landscaping.

As set out in this Hybrid Outline Application's supporting documents, the design and sustainability credentials of these blocks are commensurate with their scale. They include affordable and renewable energy sources and air quality neutral measures; with the homes themselves being spacious, highly efficient and fully insulated though with measures in place to avoid instances of undue overheating. These are qualities that will extend across every building across the Masterplan as they crystallise through subsequent Reserved Matters submissions.

Overall therefore, the proposal for the Ebury Bridge Renewal is considered to be compliant with both the strategic and local policy frameworks. It will facilitate the delivery of a new high quality urban neighbourhood that prioritises the wellbeing and comfort of existing and future residents, whilst also meeting WCC's aspirations for targeted growth and built environment enhancement.

# Appendix A

Drawing List

# **A1**

The drawings listed below are submitted with this planning application. This table also notes if the respective drawings are for approval or submitted for information only.

Drawing Number	Title	Status
Site Plans an	d Masterplan (EBR-DRG-SMP)	
EBE-AST-XX-XX-DR-A-010000	Site Location Plan: Application Boundary	Approval
EBE-AST-XX-XX-DR-A-010001	Existing Site Plan: Application Boundary	Information
EBE-AST-XX-XX-DR-A-010010	Existing Site Levels	Information
EBE-AST-XX-XX-DR-A-010020	Demolition Plan	Approval
EBE-LBA-XX-GF-DR-L-30	Illustrative Landscape Masterplan –	
0010	Ground Floor Level	Information
EBE-LBA-XX-GF-DR-L	Illustrative Landscape Masterplan – Roof Level	Information
Existing and Pr	oposed Site Elevations (EBR-DRG-SE)	
EBE-AST-XX-XX-DR-A-011200	Elevation West: Ebury Bridge Road – Existing and Proposed	Information
EBE-AST-XX-XX-DR-A-011201	Elevation East: Railway – Existing and Proposed	Information
EBE-AST-XX-XX-DR-A-011202	Elevation South: Grosvenor Estate – Existing and Proposed	Information
EBE-AST-XX-XX-DR-A-011203	Elevation North: Ebury Bridge – Existing and Proposed	Information
EBE-AST-XX-XX-DR-A-011210	Site Section West – Existing and Proposed	Information
EBE-AST-XX-XX-DR-A-011211	Site Section East – Existing and Proposed	Information
EBE-AST-XX-XX-DR-A-011212	Site Section South – Existing and Proposed	Information
EBE-AST-XX-XX-DR-A-011213	Site Section North	Information
Outline I	Parameter Plans (EBR-DRG-PP)	
EBE-AST-XX-XX-DR-A-011100	Development Plot Plan	Approval
EBE-AST-XX-XX-DR-A-011101	Proposed Site Levels	Approval
EBE-AST-XX-XX-DR-A-011102	Masterplan Phasing	Approval
EBE-AST-XX-XX-DR-A-011110	Development Zones – Basement	Approval
EBE-AST-XX-XX-DR-A-011111	Development Zones – Ground Floor	Approval
EBE-AST-XX-XX-DR-A-011112	Development Zones – Typical Floor	Approval
EBE-AST-XX-XX-DR-A-011113	Development Zones – Upper Floor (Level 6)	Approval
EBE-AST-XX-XX-DR-A-011114	Development Zones – Upper Floor	Approval
EBE-AST-XX-XX-DR-A-011115	Development Zones - Balconies	Approval
EBE-AST-XX-XX-DR-A-011120	Uses Plan – Basement	Approval
EBE-AST-XX-XX-DR-A-011121	Uses Plan – Ground Floor	Approval
EBE-AST-XX-XX-DR-A-011122	Uses Plan – First Floor	Approval
EBE-AST-XX-XX-DR-A-011123	Uses Plan – Typical Floor (Level 3)	Approval
EBE-AST-XX-XX-DR-A-011124	Uses Plan – Upper Floor (Level 6)	Approval
EBE-AST-XX-XX-DR-A-011125	Uses Plan – Upper Floor (Level 12)	Approval
EBE-AST-XX-XX-DR-A-011130	Maximum Building Heights	Approval
EBE-AST-XX-XX-DR-A-011140	Façade Character – Ground Floor	Approval

Façade Character – Typical Floor (Level 3)	Approval
Façade Character – Typical Floor (Level 6)	Approval
Façade Character – Upper Floor (Level 12)	Approval
Access and Circulation	Approval
External Amenity – Ground Floor	Approval
External Amenity – Podium	Approval
External Amenity – Terraces	Approval
ctural Plans – Blocks 7 and 8 (EBR-DRG-D	A)
Existing Site Location Plan	Information
Proposed Site Location Plan	Approval
Proposed GA Plan – Basement	Approval
Proposed GA Plan – Ground	Approval
Proposed GA Plan – First Floor	Approval
Proposed GA Plan – Second Floor	Approval
Proposed GA Plan – Third Floor	Approval
Proposed GA Plan – Fourth Floor	Approval
Proposed GA Plan – Fifth Floor	Approval
Proposed GA Plan – Sixth Floor	Approval
Proposed GA Plan – Seventh Floor	Approval
Proposed GA Plan – Eighth Floor	Approval
Proposed GA Plan – Ninth Floor	Approval
Proposed GA Plan – Tenth Floor	Approval
Proposed GA Plan – Eleventh Floor	Approval
Proposed GA Plan – Twelfth Floor	Approval
	Approval
Proposed GA Plan – Fourteenth Floor	Approval
Proposed GA Plan – Fifteenth Floor	Approval
Proposed GA Plan – Sixteenth Floor	Approval
Proposed GA Plan – Roof	Approval
Tenure Plan – Building 7	Approval
Tenure Plan – Building 8	Approval
Section AA: Detailed Area Section – North West	Approval
Detailed Area Section – Building 7 – South West	Approval
Detailed Area Section – Building 8 – South West	Approval
Detailed Area – North West Elevation	Approval
Detailed Area – South East Elevation	Approval
Detailed Area – North East Elevation	Approval
Detailed Area – South West Elevation	Approval
Bay Study – South West Elevation	Approval
Bay Study – North East Elevation	Approval
Bay Study – South East Elevation	Approval
	Approval
Building 7 – Roof Expression	Approval
Building 8 – Roof Expression	Approval
Typical Balustrade Design	Approval
cape Plans – Blocks 7 and 8 (EBR-DRG-DL	.)
Landscape Ground Floor (rendered)	Approval
Landscape First Floor Podiums (rendered)	Approval
	Façade Character – Typical Floor (Level         6)         Façade Character – Upper Floor (Level 12)         Access and Circulation         External Amenity – Ground Floor         External Amenity – Podium         External Amenity – Terraces         ctural Plans – Blocks 7 and 8 (EBR-DRG-D         Existing Site Location Plan         Proposed GA Plan – Basement         Proposed GA Plan – Ground         Proposed GA Plan – Ground Floor         Proposed GA Plan – Second Floor         Proposed GA Plan – Sixth Floor         Proposed GA Plan – Thirth Floor         Proposed GA Plan – Thirth Floor         Proposed GA Plan – Thirthenth Floor         Proposed GA Plan – Sixth Floor         Proposed GA Plan – Sixth Floor         Proposed GA Plan – Thirteenth Floor         Proposed GA Plan – Sixteenth Floor

EBE-LBA-XX-GF-DR-L-30 0013	Landscape Roof Terraces (rendered)	Approval
EBE-LBA-XX-GF-DR-L-30 0014	Landscape Ground Floor GA	Approval
EBE-LBA-XX-GF-DR-L-30 0015	Landscape First Floor Podiums GA	Approval
EBE-LBA-XX-GF-DR-L-30 0016	Landscape Roof Terraces GA	Approval
EBE-LBA-XX-GF-DR-L-30 0018	Planting Plan Ground Floor	Approval
EBE-LBA-XX-GF-DR-L-30 0019	Planting Plan First Floor Podiums	Approval
EBE-LBA-XX-GF-DR-L-30 0020	Planting Plan Roof Terraces	Approval
EBE-LBA-XX-GF-DR-L-30 0021	Landscape Sections	Approval
EBE-LBA-XX-GF-DR-L-30 0022	Landscape Details	Approval

# Appendix **B**

Crossrail 2 Technical Note

# Westminster City Council

# **Ebury Bridge Renewal**

# Crossrail 2 - Structural Methodology Statement

EBE-ARP-ZZ-XX-RP-CG-120002

Issue 1 | 3 July 2020

# **Document verification**

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		Signature				
			Issue Docume	ent verification with d	ocument	

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 257461-00

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ARUP

# ARUP

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# Introduction

### 1.1 **Purpose of this report**

This document has been prepared by Ove Arup and Partners Ltd. ('Arup') on behalf of Westminster City Council's regeneration team (the 'Applicant') in support of a Hybrid Outline Application for the renewal of the Ebury Bridge Estate, Ebury Bridge Road, London, SW1W 8PX ('the Site').

The application site falls under the March 2015 Safeguarding Directions for Development Affecting the Route and Associated Works Proposed by Transport for London for the Crossrail 2 Rail Project made by the Secretary of State for Transport.

The north-west tip of the site falls within the Limits of Land Subject to Consultation as defined on drawing sheet no.18 (See Figure 1). The purpose of this report is therefore to provide Transport for London (TfL) a brief overview of the Ebury Bridge Renewal scheme and its relation to the Crossrail 2 safeguarding.

## 1.2 The project

The scheme involves redevelopment of the Ebury Bridge Estate and is subject to a Hybrid Outline Planning Application for the following:

- A mixed use development in outline for residential floorspace and ancillary residential • facilities (Class C3) non-residential floorspace comprising flexible retail (Classes A1 -A4), community (Class D1), leisure (Class D2) and workspace (Class B1) floorspace; provision of basement; new pedestrian and vehicular access; and associated amenity space, open space, plant, landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works; and
- Detailed planning consent for Blocks 7 and 8 (Phase 1) comprising residential floorspace and ancillary residential facilities (Class C3); provision of a basement; new pedestrian and vehicular access; and associated amenity space landscaping, car and cycle parking, refuse storage, servicing area, and other associated infrastructure works.

The scheme is phased, with three distinct phases proposed. The Crossrail 2 westbound tunnel does not pose an impact on the Phase 1 works, as these are outside the influence of the exclusion zone and located to the eastern side of the development.

The scheme comprises nine residential buildings ranging in height from 8 to 17 storeys. Block 1 comprising residential floorspace and ancillary residential facilities (Class C3) with flexible retail (Classes A1 - A4) at ground floor is part of the Phase 2 and is the only building in close proximity to the CR2 safeguarding zone. All of the other buildings are at least 7.5m away from the zone. Part of the Block 1 footprint is directly above the exclusion zone.

Block 1 is currently proposed as a 8-storey building with no basement other than a sunken plant room. It is intended to found this building on shallow foundations, subject to ground investigation. Other buildings within the scheme may require piling either due to the building size or due to the presence of soft alluvial soils or ground obstructions at formation level. The A ground investigation has been specified for the purposes of designing the building foundations. This includes investigation into the foundations of the existing buildings.

The Crossrail 2 safeguarding zone and details of the current tunnel alignment has been provided to Arup, including the Crossrail 2 Tunnel Section Information for Developers dated February 2018.

It is anticipated that the construction of the proposed Phase 2 development will be complete before the construction of the proposed Crossrail 2 tunnels.



Figure 1: CR2 Safeguarding zone overlaid to the existing Ebury Bridge Estate

## **Site Conditions and Constraints** 2

The location, environment and surrounds of any site provide constraints and criteria to design. The fundamental geotechnical and environmental site conditions of the Ebury Bridge Estate are described here and have informed the design to date.

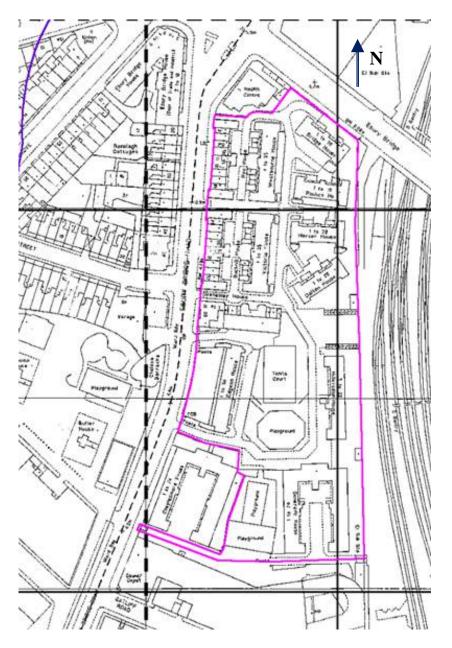


Figure 2 Site layout

## 2.1 **General site information**

### 2.1.1 **Site location**

The site is located in the Westminster City Council area. The site is bounded by:

- Ebury Bridge to the north
- Grosvenor Waterside Development to the south •
- the railway lines into and out of Victoria Station to the east •
- Ebury Bridge Road to the west

The approximate National Grid coordinates of the site are TQ286783.

### Topography 2.1.2

The ground level within the estate is generally flat between +4.1 to +4.5mOD. Ebury Bridge at the northern boundary of the site rises to the east. A retaining wall at the northern boundary of the site retains the approach road to Ebury Bridge. Approximate retained height is between 2.2m and 4.1m.



Extreme Flooding from Rivers or Sea without Defences (Zone 2) Flooding from Rivers or Sea without Defences (Zone 3) Area Benefiting from Flood Defence Flood Water Storage Areas --- Flood Defence

Figure 3 Limits of Tidal Flood Plain

The River Thames is located approximately 300m to the south of the site.

The Environment Agency assessment of the limits of the tidal floodplain in the site area is given in Figure 3. The site is shown to be within the indicative tidal flood plain area in Zone 3.

The existing ground level at the site is below the +5mOD contour line, which is considered by the Environment Agency to define the zone that would be most vulnerable to flooding if the existing system of tidal defences along the River Thames were to be breached by an extreme surge tide.

# 2.1.3 **Previous buildings on site**

The previous buildings on the site prior to the layout of the current estate in the 1930's are given below.



Figure 4 Previous buildings on site – Goads Insurance Plans c. 1901

The site was occupied by 2-3 story buildings. The northern most building and the southwestern building, both outside the current site boundary, have a basement. The site was occupied by:

- St George's Wharves in the northern part of the site. Occupied by offices, dwelling, stables, fodder storage, stores, smithy, timber stores, paint shop and coal store.
- Geo Smith & Co Ltd Saw Mills in the middle of the site. Occupied by offices, timber store and workshops, saw mill, timber shed for oven drying and travelling cranes.
- South of the site is occupied by dwellings, London General Omnibus Co Ltd Stables and Girls refuge home

It is possible some buildings could be founded on timber piles.

# 2.1.4 Grosvenor canal

The infilled Grosvenor canal is present in the eastern part of the site, see Figure 5. The canal was initially dug as a navigable tidal inlet in 1725 to provide waterborne access from the River Thames.

it was formalised as a canal and extended in 1823 up to Victoria by the Chelsea Water Company to provide water supply for the company's reservoirs. The base of the canal is expected to be about -1mOD.

The canal was backfilled in stages with its southern remnant forming an unused basin within the Grosvenor Waterside development.



Figure 5 Location of Grosvenor Canal alignment

Figure 6 Existing buildings on site

# 2.1.5 Existing buildings on site

The Grosvenor Canal was partly infilled from 1928 to 1929 and the reclaimed land became the site for the Ebury Bridge Estate. The site is currently occupied by twelve multi-storey buildings.

Construction of the Estate commenced in 1929 and the first 5-storey blocks were constructed. It is understood that the buildings were load bearing brick construction on pile foundations with hollow tile floors and tiled roofs.

A further phase followed in 1934 and it is understood that the buildings were of loadbearing brick construction with reinforced concrete floors and tiled mansard roofs.

A single level basement is present in three of the buildings, alongside Ebury Bridge Road.



### 2.1.6 **Adjacent structures**

The structures adjacent to the site are given below:

- Ebury Bridge: The old wooden bridge was replaced in 1847.
- Network Rail: South and South-west lines are east of the site. ٠
- The Western Deep Sewer Tunnel crosses the southern part of the site. ٠
- Crossrail 2 safeguarding: The Crossrail 2 safeguarded area includes the possible route of the ٠ tunnels as well as land at ground level that maybe used for the construction of the tunnels, station and shafts.



Figure 7 Ebury Bridge 1847

### **Unexploded Ordnance (UXO)** 2.1.7

Pimlico suffered a great deal of damage from air raids during WWII. An abandoned UXO is an undetonated bomb that was known to have penetrated the ground on impact but was left where it fell and not made safe. Maps from the 2017 Envirocheck report states that the risk for the presence of UXO is medium.





Figure 8 UXO – Envirocheck information

The bomb damage map (Westminster archives) shows that a High Explosive UXO (blue circle) was recovered from the Westminster City Council old depot (garden of Edgson House).



Figure 9 Bomb strikes on site (Westminster archives)

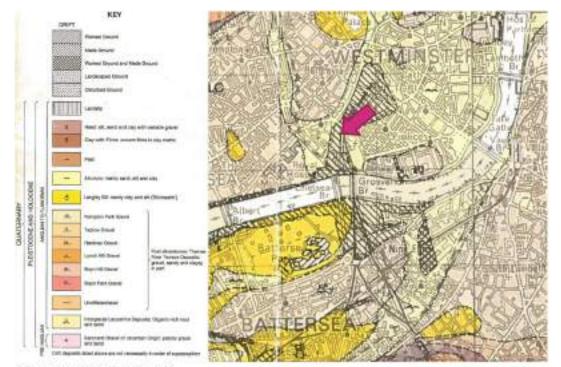
### 2.2 Archaeology

No archaeological excavations and artefact finds are known from the site thus the potential archaeological value is appreciated from discoveries within the setting and from researching the site's history. It is unlikely that substantial archaeological resource related to prehistoric to medieval age are to be found. The underlying natural alluvial formation soils and formational character and ecofact contents have a high value supporting research of the Thames's development and early interfacing with casual human activities and then farming. The site will certainly have within higher levels of made ground local value structural remains of the canal and industrial and commercial wharfs/warehouses. Remains may be substantial given the relatively open character of the site and absence of a history of basements.

### 2.3 **Geology and ground conditions**

### 2.3.1 **Geology map**

The geological map for the site is presented in Figure 10. The site is underlain by Made Ground overlying Alluvium, Terrace Gravels, London Clay, Lambeth Group, Thanet Sand and Chalk.



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## Figure 10 1998 Geological Map

### 2.3.2 **Old rivers**

The site lies in the delta formed by the River Westbourne and River Tyburn, as such the land probably was low-lying and marshy.

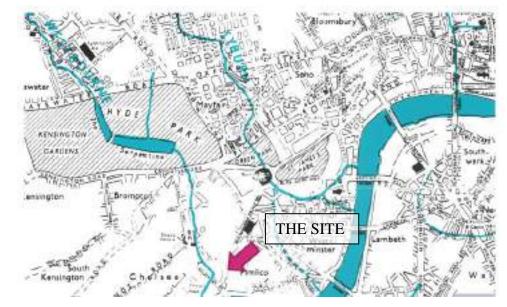


Figure 11 Old Rivers in London

It is understood that the Westbourne River had crossed the site previously before it was diverted to the path shown below. It is also understood that the River Tyburn was diverted through the site to keep the land marshy for osier beds.

There were several braided channels on the site as reported by Mike Morley in the paper titled "The Battersea Channel: a former course of the River Thames?".

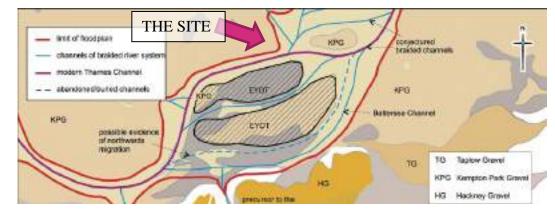


Figure 12 Braided channels on site

The site is on the inside bend of the River Thames which means that the river would have meandered between the Waterloo and Chelsea Bridges. It is understood that the main tract of the River Thames (Patel 1988) had crossed the site during the post Ipswichian period.

### 2.3.3 Ground investigation data

The following ground investigation data was available at and adjacent to the site:

- British Geological Survey data available online.
- Information on adjacent sites Chelsea Barracks, Grosvenor Waterside.
- Geo-Environmental Intrusive Site Investigation carried out by WYG at the site in 2014.
- Site investigation carried out on site for Ebury Meanwhile (Ebury Edge) (2019). .
- Site Investigation carried out on site for Ebury Bridge Estate Renewal (2020)

### 2.3.4 **Inferred stratigraphy**

The inferred stratigraphy available from ground investigation data is given in Table . The rivers and channels previously crossing the site seem to have cut into the Terrace Gravels. As such, at some locations Terrace Gravels were encountered deeper than the surrounding area.

Table 1: Preliminary Inferred Stratigraphy of the site

Stars torres	Estimated level of top of stratum (mOD)			
Stratum	Undisturbed site	Infilled Grosvenor Canal		
Made Ground/Canal Infill	Ground Level*	Ground Level*		
Alluvium (if present)	+2.0	+0.0		
Terrace Gravels (if present)	+1.7 to -5.2	+1.7 to -5.2		
London Clay	-4.0 to -7.9	-4.0 to -7.9		
Lambeth Group	-46.3	-46.3		
Thanet Sand	-64.9	-64.9		
Chalk	-73.0	-73.0		
* Ground level approximately +	4.4mOD	·		

The following assessment of the groundwater at the site has been inferred from available information. No assurance is given to its accuracy.

- Groundwater level +1mOD
- Lower aquifer -10mOD. The lower aquifer is expected to rise to +3mOD in the long term.

It is expected that perched water may be present in the Made Ground and Alluvium.

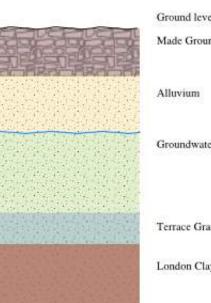


Figure 13: Estimated stratum data of site

## 2.4 Hydrogeology and groundwater

The hydrogeological regime consists of a shallow aquifer comprised of Terrace Gravels and a deeper aquifer comprised of the Thanet Sand and Chalk formations (fms), referred to as the Lower Basal Sands and Chalk Aquifer (or Lower Aquifer). The Lower Aquifer is designated as a 'Principal Aquifer' by the Environment Agency (EA) and the Terrace Gravels are designated as a 'Secondary Aquifer'.

The Lower Aquifer is being targeted for use by an Open Loop Ground Source Heat Pump (GSHP) system at the site.

## 2.5 **Ground engineering constraints**

A review of historical OS maps shows that the site has been redeveloped / reconfigured a number of times. It is possible that buried foundations and structures associated with previous phases of occupation are still present on site. The structures associated with the Grosvenor Canal, dock walls and base slab, may still be present on site.

Historical records indicate the existing buildings are supported on piles with basements for some of the existing buildings.

The design constraints for the redevelopment includes but not limited to the following:

• Timber piles: The Ebury Bridge was previously a wooden bridge. It is possible that timber piles may have supported the bridge and the buildings previously occupying the site.

el approximately	+4.4m OD
nd/ Canal Infill	+4.4m OD
:r Level	+3.0m OD
er Level	+1.0m OD
wels	-4.0m OD
у	-5.5m OD

- Infilled Grosvenor Canal: Canal structures including canal wall, base slab and unknown infill materials.
- Previous foundations: The site was occupied by several buildings. Details not known. Heritage report refers to thick concrete encountered at the previous depot area in 1930.
- Existing foundations: Heritage report refers to the existing buildings being on piled foundation, but no historical drawings are available for confirmation. The presence of infilled canal and thick Alluvium encountered in the area also suggest piled foundation.
- Existing basement: Heritage report states Rye and Bucknill Houses have single level basements. Historical drawings of Edgson House shows it to be a 2m to 3m deep single level basement.
- Air raid shelters: White Young and Green report (2014) states air raid shelters were encountered in the northern part of the site.
- Extra High Voltage cables: there are a set of three existing UKPN 132kV extra-high voltage cables that traverse the site from north east to south west. The cables are intended to be diverted but at the time of writing are still live and energised.
- The Crossrail 2 safeguarding area overlaps the northwest corner of the site (i.e. part of the existing Rye building is within the safeguarding area).
- Thames Water Great Western Deep Sewer: A 2.54m internal diameter concrete sewer with an invert level of approximately 35m below ground level passes the southwest corner of the site. Previous recommendations at Arup Projects had piles outside the exclusion zones of sewer (3m on plan and 6m above sewer).
- Interface with Network Rail (NR): Groundwise report includes NR's confirmation that the area immediate to the east of the Ebury Bridge Estate including the access road to British Transport Police station is owned by NR. Interface with NR would be expected throughout the project.
- Retaining wall to the north of site retaining the approach to Ebury Bridge (see locations on design constraints map). Groundwise report did not provide information on the asset owner. Topographical survey shows that the retained height is between 2.2m and 4.1m.

#### Flood Risk and surface water management 2.6

A site-specific Flood Risk Assessment (FRA) has been prepared to support the planning application for the Site because it is located in Flood Zone 3 on the Flood Map for Planning (refer to Figure 14). The FRA has been prepared in accordance with the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance (PPG).



Figure 14 Flood Map for Planning – Rivers and Sea (EA, 2017)

#### 2.7 **Vibration surveys and outcomes**

The site of the proposed development is near Victoria train station and has over-ground railway lines running along its eastern boundary. Vibration surveys were carried out to the existing buildings, to establish typical existing vibration levels due to train pass-bys, and to inform the need for any vibration or acoustic isolation measures within the structural design.

The findings were that no isolation measures are required for Ebury site.

#### **Crossrail 2 Constraints** 2.8

The Crossrail 2 constraints are defined by the safeguarding zone and tunnel alignment plus the Information for Developers pack that CR2 has provided. The document sets out the design requirements for developers to design buildings to meet the safeguarding objectives and the exclusion and tolerance zones. The safeguarding zone impact only the structural design of buildings within Phase 2 of the scheme, not Phase 1.

The building above the safeguarding zone needs to comply with the requirements given in Information for Developers (February 2018). This includes:

- No structure within the Crossrail Exclusion and Tolerances zones (as defined in Figure 1 of Information for Developers)
- Development foundations not to exceed the loading limits



- Building to be designed to accommodate ground movement arising from construction of the • tunnels
- Building to be designed to accommodate the stated noise and vibrations levels •

The alignment adjustment, exclusion and construction tolerance zones around the Crossrail 2 tunnels are defined by Crossrail 2 in Information for Developers (January 2018) as shown in Figure 1. The upper limit of acceptable stress levels given in the Crossrail 2 - Information for Developers (February 2018) are stated as either:

- the existing ground overburden plus the loading from any existing development; or
- the existing ground overburden plus 50kN/m<sup>2</sup> imposed at ground level over the footprint of the development.

The construction of the main bearing piles and excavation of the redevelopment is due to be completed in advance of the construction of the Crossrail 2 tunnels.

#### **Design Response** 3

#### 3.1 **Existing Condition**

The existing 5-storey building, Rye House, is a solid masonry structure with beam and pot floors. A shallow basement is present beneath the existing building in the portion along Ebury Road (see Figure 19).



Figure 15: Existing building to be demolished (view from Ebury Bridge Road)

#### **Proposed New Building (Block 01)** 3.2

The structural frame proposed for the new building comprises of an in-situ concrete frame to form the 8 stories Block 01, which will be constructed as part of the Phase 2 of the development. It is set back from the road slightly further than the existing building.

No basement is proposed for this building, only a relatively small plant room located away from the exclusion zone. The building will be founded on piles constructed outside the safeguarding zone.



Figure 16: Proposed Block 01 (view looking south down Ebury Bridge Road)

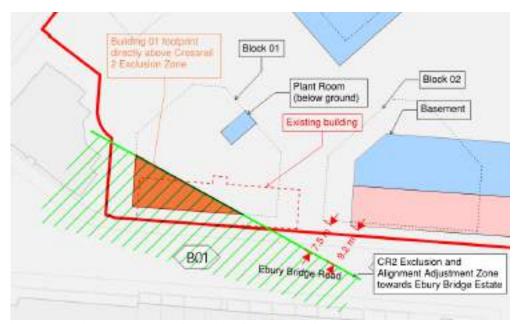


Figure 17: Block 01 relation to the Exclusion and Alignment Adjustment zone.

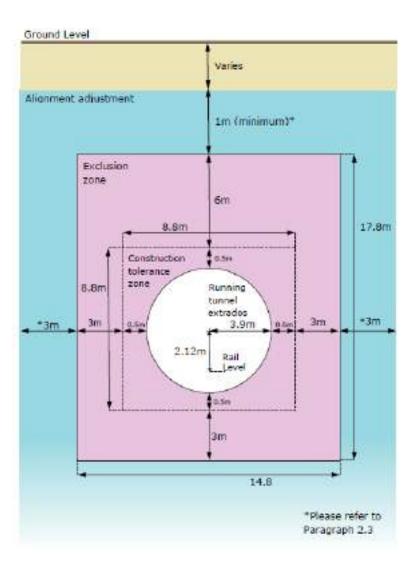


Figure 18: Extract from the Crossrail 2 Tunnel Section Information for Developers document (February 2018)

#### 3.3 **Foundation proposals**

The proposal is to **cantilever the portion of the building above the CR2** exclusion zone with the all the piled foundations located outside the exclusion and alignment adjustment zone, including site construction tolerances, as indicated in Figure 19.

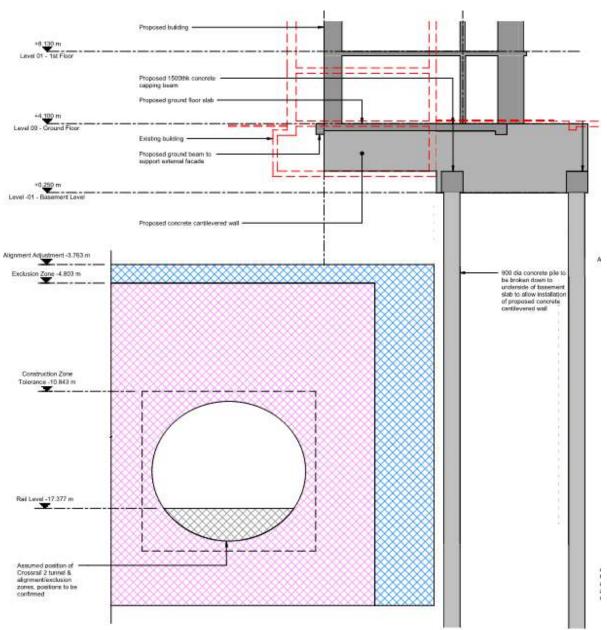


Figure 19: Indicative section view of Block 01 (Phase 1)

The ground floor slab will be formed of reinforced concrete, designed to span between pile caps and the transfer ground beams (see Figure 19). The proposal is to form the transfer beam within the existing basement, hence, to not impact the CR2 safeguarding zone.

Loading from the initial structural scheme design was compared to estimated strata strengths for the ground from the geotechnical desk study. The London Clay would be able to deal with the weight of the proposed buildings, found at approximately 10m below the current ground level (see Figure 1). To get the superstructure loads into competent ground piled foundations are generally proposed. These will be installed outside the Crossrail 2 Exclusion and Alignment Adjustment zone.



Figure 20: Example of Pile Boring with temporary casing

From a construction perspective, it is expected that temporary casing will be required through the "poor" top soil layer (see Figure 20). This will also deal with the high-water table and the risk of water ingress in the open bored hole. The secant piled wall forming the small underground box needs to extend into the clay layer to "cut-off" the ingress of water during the groundworks, as mentioned this is set back from the Crossrail 2 Exclusion and Alignment Adjustment zone.

#### 3.4 Substructure Design

The agreed exclusion zone around the Crossrail 2 running tunnels will restrict the position of the main bearing piles to outside of the tunnel exclusion zone that pass beneath the site.

The existing building features an existing basement which is approximately 2.4m deep. This will be backfilled after forming the new cantilevering transfer beams which would allow to not transfer any of the vertical loads from the Block 1 superstructure directly above the CR2 safeguarding zone.

The proposed foundation solution is for bored concrete piles to transfer the building loads to the ground via friction into the London Clay layer. An alternative scheme where the buildings are supported on raft foundations was previously investigated. A raft relies on a thick concrete slab to evenly distribute building loads to competent soils at the formation level. As described in previous

sections, the expected soil at the underside of the building is not adequate to enable this type of foundation (e.g. excessive settlements).

The piles have been sized based on minimising diameters and maximising lengths as this is most effective at reducing excavation and concrete volume. 750mm and 900mm diameter piles are typically expected to be adequate, in groups where applicable.

It is expected that a Rotary Bored pile rig would be used given the in-ground obstructions and soil typology as described previously. Piles are expected to be generally between 25 and 35m long with temporary casings over the top portion of the bore to deal with soil collapse and water ingress (e.g. approximately 10 m to the London Clay strata).

The piling mat will be designed and specified by the specialist piling contractor. It is envisaged that this will be making re-use of material from the demolition of the existing buildings.

The ground floor slab has been designed as a suspended reinforced concrete slab spanning between pile caps. However, since more susceptible to seasonal soil swelling and heave, this slab is cast on top of heave board which is placed to mitigate against potentially expansive soils. This layer may be removed pending ground investigation results confirming a soil stratigraphy low likelihood of heave.

#### 3.5 **Next Steps**

The current design to inform the Outline planning submission is at a RIBA Stage 2 level of design detail. During the next design stage for Phase 2, the design of Block 01 will be further developed to establish the exact sizing of the substructure. The next steps should also include:

- Calculation of negative skin friction due to the tunnelling settlements. The Crossrail 2 tunnel affects the Phase 2 works by causing ground settlement around the bearing piles and beneath the suspended ground slab. For piles within the influence of the Crossrail tunnel, ground settlement causes negative skin friction on the upper section of the shafts of the bearing piles. The horizontal movement of the soil towards the tunnel induces bending and shear in the bearing piles.
- Assessment of ground-borne vibration by the rail tunnel. ٠

For the Phase 2 buildings, the exclusion zone will be clearly marked on future construction drawings and the contractor carrying out the main bearing pile construction will be required to submit a method statement detailing their setting out process to ensure that the piles will remain outside the exclusion zone during piling allowing for construction tolerances.

#### 3.6 Submission to Crossrail 2

The building over the CR2 safeguarding zone is currently planned to be constructed in Phase 2 of the development and a planning condition can be attached to the relevant Reserved Matters for that Phase to provide the further details required by CR2. Any such conditions received through the planning process will be reviewed and discharged as appropriate at a future design stage.

This is in line with the discussion at the meeting held on the 28<sup>th</sup> of May 2019 at Arup office in London, attended by:

- Crossrail: Michael Johnson, Katie Abrahams, Mike Black;
- Arup: Sarah Glover, Francesco Ferrari, Pietro Bologna;

Refer also to the minutes circulated after the meeting in Appendix A.

## Appendix A

## Minutes

ARUP

Project title	Ebury Bridge Road	Job number 257461
Meeting name and number	Crossrail 2	File reference 10-2
Location	Emmerson Room, Arup, 8 Fitzroy Stree W1T 4Bq	et, Time and date 1100 28 May 2019
Purpose of meeting	Initial consultation to introduce Crossra establish development requirements	il 2 to the proposed scheme and
Present	Katie Abrahams, CR2 P	Mike Black, CR2 Pietro Bologna, Arup (CR2) Garah Glover, Arup
Apologies	Lohini Ganesharatnam, Arup	
Circulation	Those present Lohini Ganesharatnam, Arup R	Rory O'Malley, Arup

Action

#### Introduction to scheme 1.

Francesco Ferrari (FF) gave a brief introduction to the scheme at Ebury Bridge Road. Presentation slides are attached to these minutes.

The scheme involves redevelopment of an existing residential site into a new residential development for the London Borough of Westminster.

The scheme comprises residential buildings ranging in height from 7 to 17 storeys. The building over the CR2 safeguarding zone is currently proposed as a 7-storey building with a single level basement. It is intended to found this building on shallow foundations, subject to ground investigation. Other buildings may require piling either due to the building size or due to the presence of soft alluvial soils or ground obstructions at formation level. The existing 5-storey building (approx. 1930s) will be demolished and replaced by the new development.

The Ebury team have produced a desk study. Sarah Glover (SG) to ask Westminster whether this can be shared with Crossrail 2.

Prepared by Sarah Glover Date of circulation 28/05/19 Date of next meeting TBC

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Anip | Fil 3

Project title

2.

Ebury Bridge Road

Minutes

A ground investigation has been specified for the purposes of designing the Ebury Bridge building foundations. This includes investigation into the foundations of the existing buildings. SG to ask Westminster whether this information can be shared with CR2 once it becomes available.

**Crossrail 2 constraints** 

The Crossrail 2 safeguarding zone and details of the current tunnel alignment has been provided to Arup. Sarah Glover (SG) has not seen these yet but they may have been sent to Lohini

Ganesharatnam (LG). SG to check.

The Crossrail 2 constraints are defined by the safeguarding zone and tunnel alignment plus the Information for Developers pack that CR2 has provided. The building above the safeguarding zone needs to comply with the requirements given in Information for Developers (February 2018). This includes:

- No structure within the Crossrail Exclusion and Tolerances zones (as defined in Figure 1 of Information for Developers)
- · Development foundations not to exceed the loading limits
- Building to be designed to accommodate ground movement arising from construction of the tunnels
- Building to be designed to accommodate the stated noise and vibrations levels

Michael Johnson (MJ) explained that the current safeguarded route (safeguarded in 2015) may be adjusted by CR2, however this process (if it happens) may take several years. The Ebury Bridge Road development should work to the information that has been provided by Crossrail 2. Changes to the safeguarded route may result in a small change to the safeguarded route, however the use of the corridor may be significantly different. The changes are related to the potential for a station at King's Road (or not).

SG

SG

Submissions to CR2

The planning submission should acknowledge the presence of the CR2 safeguarded route and state that the design has met the design principles within the Information for Developers pack. Westminster Council, in consultation with Crossrail 2 will then impose a planning condition on the development.

The building over the CR2 safeguarding zone is currently planned to be constructed in Phase 2 of the development. If details of the

Page 1 of 3

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3.

Job	nu	mb	er
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Date of Meeting

28 May 2019

Action

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## Minutes

Project title	Job number	Date of Meeting
Ebury Bridge Road	257461	28 May 2019

Action

construction phasing are submitted as part of the planning application, then CR2 would be able to impose a planning condition only on the phase that is impacted by CR2 (i.e. Phase 2).

To discharge the planning condition, the following is likely to be required:

- Noise and vibration assessment: Report demonstrating that a noise and vibration assessment has been carried out and detailing the mitigation measures that have been incorporated in the design (or demonstrating that mitigation is not required)
- Geotechnical report: Report demonstrating that the building has been designed to accommodate ground movements arising from Crossrail 2 construction and that the loading limits on Crossrail 2 tunnels are not exceeded.

### 4. Further meetings

No further meetings planned pre-planning application submission unless the scheme changes significantly.

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## Appendix C

Existing Unit Mix Schedule

### Summary - Whole Estate

		No. Units						Social Rented									Private Leaseho	d			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Bridge House	17	8	9		4	1			2	1				3	1	2		1			2
Bucknill House	24	19	5	6	2	3	7					1			1	3					1
Dalton House	17	8	9		3	2			2			1		4		2		1	1		1
Doneraile House	64	35	29		9	11	7	2	5	1				9	4	7	2		7		
Edgson House	55	41	14	30			11						8			6					
Hillersdon House	27	17	10		4	2	9		2					2	4	2		2			
Mercer House	17	6	11		2	1	2		1					5	1			2	1		2
Pimlico House	17	6	11		4		1					1		3	2	1		3	1		1
Rye House	24	8	16	2		1	4					1		2		14					
Victoria House	26	12	14	4	2		3					3	2	3		8					1
Westbourne House	26	16	10	5	3		6					2	1	2		5					2
Wellesley House	10	10			2	3	1	3	1												
Wainwright House	12	12			2		10														
Totals	336	198	138	47	37	24	61	5	13	2		9	11	33	13	50	2	9	10		10
Total hab room	959	548	411	94	74	72	183	20	52	8		45	22	66	39	150	8	36	40		50

### Number and Breakdown of Units by Unit Type

	Totals		Social Ren	ited			Private L	.easehold	
House / Block		1 Beds	2 Beds	3 Beds	4 Beds	1 Beds	2 Beds	3 Beds	4 Beds
Bridge House	17	4	1	3		3	3	1	2
Bucknill House	24	8	10		1		5		
Dalton House	17	3	2	2	1	4	2	2	1
Doneraile House	64	9	18	8		9	11	9	
Edgson House	55	30	11			8	6		
Hillersdon House	27	4	11	2		2	6	2	
Mercer House	17	2	3	1		5	1	3	2
Pimlico House	17	4	1		1	3	3	4	1
Rye House	24	2	5		1	2	14		
Victoria House	26	6	3		3	5	8		1
Westbourne House	26	8	6		2	3	5		2
Wellesley House	10	2	4	4					
Wainwright House	12	2	10						
Totals	336	84	85	20	9	44	64	21	9
Breakdown by %age	100%	25%	25%	6%	3%	13%	19%	6%	3%
Breakdown by Tenure		42%	43%	10%	5%	32%	46%	15%	7%

## Gross Internal Areas by Unit Size and Block

			Total Are	eas						Social	Rented							Private	Leasehold			
		Total	Social	Rented	Pri	ivate	1	Beds	2 E	3eds	3 E	eds	4 E	Beds	1 B	Beds	2 E	Beds	3 B	eds	4 B	Beds
House / Block	sq. ft	sq. m.	sq. ft	sq. m.	sq. ft	sq. m.	sq. ft*	sq. m.	sq. ft*	sq. m.	sq. ft*	sq. m.										
Bridge House	11,916	1,107	5,350	497	6,566	610	2,067	192	646	60	2,637	245			1,550	144	2,110	196	861	80	2,045	190
Bucknill House	14,736	1,369	11,084	1,030	3,652	339	3,264	303	6,763	628			1,057	98			3,652	339				
Dalton House	11,917	1,107	5,587	519	6,330	588	1,550	144	1,292	120	1,722	160	1,023	95	2,067	192	1,464	136	1,776	165	1,023	95
Doneraile House	49,308	4,581	24,585	2,284	24,723	2,297	4,844	450	12,497	1,161	7,244	673			9,149	850	7,900	734	7,674	713		
Edgson House	23,896	2,220	16,490	1,532	7,406	688	8,439	784	8,051	748					3,014	280	4,392	408				
Hillersdon House	18,470	1,716	11,668	1,084	6,802	632	2,067	192	7,879	732	1,722	160			1,033	96	4,047	376	1,722	160		
Mercer House	11,915	1,107	4,004	372	7,911	735	1,033	96	2,110	196	861	80			2,583	240	646	60	2,637	245	2,045	190
Pimlico House	11,917	1,107	3,822	355	8,095	752	2,067	192	732	68			1,023	95	1,550	144	2,024	188	3,498	325	1,023	95
Rye House	14,736	1,369	4,946	459	9,790	910	769	71	3,120	290			1,057	98	769	71	9,021	838				
Victoria House	16,787	1,560	8,079	751	8,708	809	3,168	294	1,800	167			3,111	289	3,097	288	4,556	423			1,055	98
Westbourne House	16,787	1,560	9,746	905	7,041	654	4,253	395	3,408	317			2,085	194	2,012	187	5,029	467				
Wellesley House	7,405	688	7,405	688			1,033	96	2,928	272	3,444	320										
Wainwright House	9,430	876	9,430	876			1,249	116	8,181	760												
Totals	219,220	20,366	122,196	11,352	97,024	9,014	35,803	3,326	59,407	5,519	17,630	1,638	9,356	869	26,824	2,492	44,841	4,166	18,168	1,688	7,191	668

## Ebury Bridge Estate

## Accommodation Schedule and Unit Mix

02 July 2020

\* Areas and Number of Units taken from Appendix 1.5 of the "EBURY BRIDGE ESTATE DESIGN AND ACCESS REPORT"- REVISED MAY 2014 BY HTA FOR AND BEHALF OF WESTMINSTER CITY COUNCIL, and Deloitte Report Appendix 2

Bridge House	5 floors	17 units																			
Floor		No. Units						Social Rented									Private Leaseho	d			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	3	3			1				1	1											
1st	3		3											1				1			1
2nd	3	2	1		1				1												1
3rd	4	2	2		1	1								1		1					
4th	4	1	3		1									1	1	1					
Totals	17	8	9		4	1			2	1				3	1	2		1			2

Bucknill House	5 floors	24 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B / 1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	2	2			2																
1st	4	2	2			1						1				1					1
2nd	6	4	2	2		1	1									2					
3rd	6	5	1	2			3								1						
4th	6	6		2		1	3														
Totals	24	19	5	6	2	3	7					1			1	3					1

Dalton House	5 floors	17 units																			
Floor		No. Units						Social Rented									Private Leasehole	d			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	3	1	2						1					1					1		
1st	3		3											1				1			1
2nd	3	3			1				1			1									
3rd	4	3	1		2	1										1					
4th	4	1	3			1								2		1					4
Totals	17	8	9		3	2			2			1		4		2		1	1		1

Doneraile House	6 floors	64 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	10	3	7						3					2		2			3		
1st	10	6	4			2	2		2										4		
2nd	12	8	4			4	4							2		2					
3rd	14	9	5		6	2	1							2	2	1					
4th	9	4.5	4.5		1.5	1.5		1		0.5				1.5	1	1	1				
5th	9	4.5	4.5		1.5	1.5		1		0.5				1.5	1	1	1				
Totals	64	35	29		9	11	7	2	5	1				9	4	7	2		7		

2

Edgson House	9 floors	55 units																			
Floor		No. Units						Social Rented									Private Leaseho	ld			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	4	2.5	1.5				2.5									1.5					
1st	4	2.5	1.5				2.5									1.5					
2nd	8	6	2	6									2								
3rd	8	7	1	7									1								
4th	8	6	2	6									2								
5th	7	7		6			1														
6th	8	5	3	5									3								
7th	4	2.5	1.5				2.5									1.5					
8th	4	2.5	1.5				2.5									1.5					
Totals	55	41	14	30			11						8			6					

Hillersdon House	6 floors	27 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	5	5			2	1			2												
1st	5	3	2				3							1	1						
2nd	5	3	2				3							1	1						
3rd	5	4	1		1	1	2									1					
4th	3.5	1	2.5		0.5		0.5								1	0.5		1			
5th	3.5	1	2.5		0.5		0.5								1	0.5		1			
Totals	27	17	10		4	2	9		2					2	4	2		2			

Mercer House	5 floors	17 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	3	1	2						1					1					1		
1st	3		3											1				1			1
2nd	3	1	2		1													1			1
3rd	4	1	3				1							2	1						
4th	4	3	1		1	1	1							1							
Totals	17	6	11		2	1	2		1					5	1			2	1		2

Pimlico House	5 floors	17 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B / 1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	3	1	2		1													1	1		
1st	4	2	2		1							1		1				1			
2nd	5		5											2	1			1			1
3rd	3	1	2				1								1	1					
4th	2	2			2																
Totals	17	6	11		4		1					1		3	2	1		3	1		1

Rye House	5 floors	24 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B / 1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	2		2											2							
1st	4	2	2				1					1			1						1
2nd	6	3	3			1	2						2			1					
3rd	6	2	4	2											1	3					
4th	6	1	5				1						2		1	2					
Totals	24	8	16	2		1	4					1	4	2	3	6					1

3

Victoria House	5 floors	26 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B/2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	4	2	2									2		1		1					
1st	4	2	2		1							1				1					1
2nd	6	5	1	2			3							1							
3rd	6	1	5	1									1	1		3					
4th	6	2	4	1	1								1			3					
Totals	26	12	14	4	2		3					3	2	3		8					1

Westbourne House	5 floors	26 units																			
Floor		No. Units						Social Rented								I	Private Leasehold				
	Total	Social Rented	Private	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	4	3	1		1		1					1									1
1st	4	2	2		1							1				1					1
2nd	6	3	3	2			1							1		2					
3rd	6	2	4	1			1						1	1		2					
4th	6	6		2	1		3														
Totals	26	16	10	5	3		6					2	1	2		5					2

Wellesley House	5 floors	10 units																			
Floor		No. Units						Social Rented								F	Private Leasehol	d			
	Total	Social Rented	Private	1B / 1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B / 1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	2	2			2																
1st	2	2				1		1													
2nd	2	2				1		1													
3rd	2	2				1		1													
4th	2	2					1		1												
Totals	10	10			2	3	1	3	1												

Wainwright House	3 floors	12 units																			
Floor		No. Units						Social Rented									Private Leasehol	d			
	Total	Social Rented	Private	1B / 1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
Gr.	2	2			1		1														
1st	5	5			1		4														
2nd	5	5					5														
Totals	12	12			2		10														
			-				-				-								-		

Estate		No. Units						Social Rented									Private Leasehold	ł			
	Total	Social Rented	Private	1B / 1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P	1B/1P	1B / 2P	2B / 3P	2B / 4P	3B / 4P	3B / 5P	3B / 6P	4B / 6P	4B / 7P
TOTALS	336	198	138	47	37	24	61	5	13	2		9	15	33	16	42	2	9	10		11

4

## Appendix D

Building 7 and 8 Unit Mix Schedule

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10/07/2020 EBURY BRIDGE ESTATI Detailed Mix Schedule Building 7

Level Area Apartment number Туре Hab. Rooms N. Bedrooms N. Bedspaces Tenure Accessibility Dual/Single Aspect Orientation 1.01 04.B 137.5 Social Rent M4(2) Dual NW/NE 1.02 04.C 117.5 Social Rent M4(2) Dual NE/SE Floor 01 1.03 03.D 104.6 Social Rent M4(2) Dual NE/SE 1.04 01.E 63.1 Social Rent M4(2) Dual SW/SE 76.3 M4(2) 1.05 02.A Social Rent Dual SW/SE 2.01 01.A 53.1 Social Rent M4(2) Dual SW/NW 2 2.02 03.B 88.2 Social Rent M4(2) Dual SW/NW 2.03 02.B 72.5 M4(2) Floor 02 Social Rent Dual NW/NE 4 03.A M4(2) 2.04 89.7 Social Rent Dual SW/SE 2.05 02.A 76.3 M4(2) 4 Social Rent Dual SW/SE M4(3) 3.01 01.A Social Rent 53.1 SW/NW 2 Dual 2 88.2 M4(2) SW/NW 3.02 03.B Social Rent Dual 3.03 02.B M4(2) 72.5 Social Rent NW/NE Dual 3.04 02.A 76.3 M4(2) NW/NE Social Rent Dual Floor 03 02.A 76.3 Social Rent M4(2) Dual NE/SE 3.06 01.B 51 Social Rent M4(2) Dual NE/SE 3.07 03.A 89.7 Social Rent M4(2) Dual SW/SE 3.08 02.A 76.3 Social Rent M4(2) Dual SW/SE 4.01 01.A 53.1 Social Rent M4(3) Dual SW/NW 2 4.02 03.B 88.2 Social Rent M4(2) Dual SW/NW 4.03 02.B 72.5 Social Rent M4(2) Dual NW/NE M4(2) 4.04 02.A 76.3 Social Rent Dual NW/NE Floor 04 02.A 76.3 M4(2) 4.05 4 Social Rent Dual NE/SE M4(2) 4.06 01.B 51 Social Rent Dual NE/SE 89.7 M4(2) 4.07 03.A Social Rent SW/SE Dual 4.08 76.3 M4(2) 02.A SW/SE Social Rent Dual 01.A M4(2) 5.01 53.1 Intermediate Dual SW/NW 2 5.02 03.B 88.2 M4(2) SW/NW Dual Social Rent 02.B 72.5 M4(2) 5.03 Social Rent Dual NW/NE 5.04 02.A 76.3 Social Rent M4(3) Dual NW/NE Floor 05 5.05 02.A 76.3 Social Rent M4(2) Dual NE/SE 5.06 01.B 51 Intermediate M4(2) Dual NE/SE 5.07 03.A 89.7 Social Rent M4(2) Dual SW/SE 5.08 02.A 76.3 Intermediate M4(2) Dual SW/SE 6.01 01.A 53.1 2 Intermediate M4(2) Dual SW/NW 2 1 6.02 03.B 88.2 Social Rent M4(2) Dual SW/NW 72.5 6.03 02.B Intermediate M4(2) Dual NW/NE 02.A 76.3 M4(3) 6.04 3 4 Social Rent Dual NW/NE Floor 06 6.05 02.A 76.3 Social Rent M4(2) NE/SE Dual 01.B 6.06 M4(2) NE/SE 51 Dual Intermediate 89.7 M4(2) 6.07 03.A Social Rent Dual SW/SE 6.08 02.A 76.3 M4(3) Intermediate Dual SW/SE 53.1 Intermediate M4(2) SW/NW 7.01 01.A Dual 2 7.02 03.B 88.2 M4(3) SW/NW Social Rent Dual 7.03 02.B 72.5 Intermediate M4(2) NW/NE Dual 7.04 02.A 76.3 M4(2) Dual NW/NE Intermediate Floor 07 7.05 02.A 76.3 4 M4(2) Dual NE/SE Intermediate 7.06 01.B 51 Intermediate M4(2) Dual NE/SE 7.07 03.A 89.7 Intermediate M4(2) Dual SW/SE 7.08 02.A 76.3 Intermediate M4(2) Dual SW/SE 8.01 01.A 53.1 Intermediate M4(2) Dual SW/NW 8.02 03.B 88.2 Intermediate M4(2) Dual SW/NW 4 8.03 02.B 72.5 4 Intermediate M4(2) Dual NW/NE M4(2) NW/NE 8.04 02.A 76.3 Intermediate Dual Floor 08 M4(2) 8.05 02.A 76.3 4 Intermediate Dual NE/SE M4(2) 8.06 01.B 51 NE/SE Intermediate Dual 2 8.07 89.7 M4(2) 03.A SW/SE Intermediate Dual 4 5 8.08 02.A 76.3 4 M4(2) 3 Intermediate Dual SW/SE

	9.01	01.A	53.1	2	1	2	Market	M4(3)	Dual	SW/NW
	9.02	03.B	88.2	4	3	5	Market	M4(2)	Dual	SW/NW
	9.03	02.B	72.5	3	2	4	Market	M4(2)	Dual	NW/NE
51 00	9.04	02.A	76.3	3	2	4	Market	M4(2)	Dual	NW/NE
Floor 09	9.05	02.A	76.3	3	2	4	Market	M4(2)	Dual	NE/SE
	9.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	9.07	03.A	89.7	4	3	5	Market	M4(2)	Dual	SW/SE
	9.08	02.A	76.3	3	2	4	Market	M4(2)	Dual	SW/SE
	10.01	01.A	53.1	2	1	2	Market	M4(3)	Dual	SW/NW
	10.02	03.B	88.2	4	3	5	Market	M4(3)	Dual	SW/NW
	10.03	02.B	72.5	3	2	4	Market	M4(2)	Dual	NW/NE
51	10.04	02.A	76.3	3	2	4	Market	M4(2)	Dual	NW/NE
Floor 10	10.05	02.A	76.3	3	2	4	Market	M4(2)	Dual	NE/SE
	10.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	10.07	03.A	89.7	4	3	5	Market	M4(2)	Dual	SW/SE
	10.08	02.A	76.3	3	2	4	Market	M4(2)	Dual	SW/SE
	11.01	01.A	53.1	2	1	2	Social Rent	M4(2)	Dual	SW/NW
	11.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
	11.03	02.B	72.5	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	11.04	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 11	11.05	02.A	76.3	3	2	4	Social Rent	M4(3)	Dual	NE/SE
	11.06	01.B	51	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	11.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	11.08	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	SW/SE
	12.01	01.C	51.8	2	1	2	Social Rent	M4(2)	Dual	SW/NW
	12.02	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	12.03	02.A	76.3	3	2	4	Social Rent	M4(3)	Dual	NE/SE
Floor 12	12.04	01.B	51	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	12.05	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	12.06	01.D	54.5	2	1	2	Social Rent	M4(2)	Single	SW
	13.01	01.C	51.8	2	1	2	Market	M4(2)	Dual	SW/NW
	13.02	02.A	76.3	3	2	1	Market	M4(2)	Dual	NW/NE
	13.03	02.A	76.3	3	2	4	Market	M4(2)	Dual	NE/SE
Floor 13	13.04	01.B	51	2	1	2	Market	M4(2)	Dual	NE/SE
	13.05	03.A	89.7	1	3	5	Market	M4(2)	Dual	SW/SE
	13.06	01.D	54.5	2	1	2	Market	M4(2)	Single	SW
	14.01	01.C	51.8	2	1	2	Market	M4(2)	Dual	SW/NW
	14.02	02.A	76.3	2	2	4	Market	M4(2)	Dual	NW/NE
	14.02	02.A	76.3	2	2	4		M4(2)	Dual	NE/SE
Floor 14	14.04	02.A 01.B	51	2	1	2	Market Market	M4(2)	Dual	NE/SE
	14.05	03.A	89.7	4	3	5	Market	M4(2)	Dual	SW/SE
	14.06	01.D	54.5	2	1	2	Market	M4(2)	Single	SW
	15.01	01.C	51.8	2	1 1	2	Market	M4(2)	Dual	SW/NW
	15.02	01.C 02.A	76.3	2	<u>+</u> 2	4	Market		Dual	
	15.02	02.A 02.A	76.3	2	2	4		M4(3)		NW/NE
Floor 15	15.04	02.A 01.B	51	2 2	1	+ 2	Market Market	M4(2)	Dual Dual	NE/SE NE/SE
	15.04 15.05	01.B 03.A	89.7	4	1 2	5		M4(2) M4(2)		
	15.06	03.A 01.D	54.5	<del>1</del>	3	5	Market Market	M4(2) M4(2)	Dual	SW/SE SW
				2	1	2			Single	
	16.01	01.C	51.8	2	1	4	Market	M4(2)	Dual	SW/NW
	16.02	02.A	76.3	3	2	4	Market	M4(2)	Dual	NW/NE
	16.03	02.A	76.3	3	2	4	Market	M4(2)		NE/SE
	16.04	01.B	51	2	1	2	Market			NE/SE
	16.05	03.A	89.7	4	3	5	Market	M4(2)		SW/SE
	16.06	01.D	54.5	2	1	2	Market	M4(2)	Single	SW
_			Dest CIA: 0407	N. 11-1-1-10-1	N. D. June 210	N. D. Jan. 400	N. U.S. 442	M4(2)Ob 42	Circle Ot u 5	
				N. Habrm: 331	N. Bedrm: 219	N. Bedsp: 408		M4(3)Qty: 12	Single Qty: 5	-
Total B7	N. Homes: 112	n/a	Social Area: 3850	Social Habrm: 158	Social Bedrm: 108	Social Bedsp: 197	Social Qty: 50	Social M4(3) h: 7	Single %: 0.04	n/a
		,-	Intermediate Area: 1614	Intermediate Habrm: 65		Intermediate Bedsp: 79	Intermediate Qty: 24	Intermediate M4(3) h: 1	Dual Qty: 107	
			Market Area: 2663	Mrkt HbRm: 108	Market Bedrm: 70	Market Bedsp: 132	Market Qty: 38	Market M4(3) h: 4	Dual %: 0.96	

# <u>astudio</u>

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Detailed Mix Schedule Building 8

.evel	Apartment number	Туре	Area	Hab. Rooms	N. Bedrooms	N. Bedspaces	Tenure	Accessibility	Dual/ Single Aspect	Orientation
	0.01	03.C	106.9	4	3	5	Social Rent	M4(2)	Dual	SW/NW
GF	0.02	04.E	131	5	4	6	Social Rent	M4(2)	Dual	SW/NW
	0.03	04.A	135.9	5	4	7	Social Rent	M4(2)	Dual	SW/SE
	1.01	04.D	136.2	5	4	6	Social Rent	M4(2)	Dual	NW/NE
	1.02	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	, NW/NE
Floor 01	1.03	04.C	117.5	5	4	6	Social Rent	M4(2)	Dual	NE/SE
11001 01	1.04	01.B	59.6	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	1.05	05.A	148.1	6	5	7	Social Rent	M4(2)	Dual	SW/SE
	2.01		53.1	0	1	2		M4(2)	Dual	SW/SE
		01.A		2	-	2	Social Rent			
	2.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
Floor 02	2.03	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	2.04	01.B	51	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	2.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	SW/SE
	3.01	01.A	53.1	2	1	2	Social Rent	M4(3)	Dual	SW/NW
	3.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
	3.03	02.B	72.5	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	3.04	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 03	3.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	, NE/SE
	3.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	3.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	3.08	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	SW/SE
		02.A 01.A	53.1	2	1	1				SW/NW
	4.01			2	1	2	Social Rent	M4(2)	Dual	
	4.02	03.B	88.2	4	3	5	Social Rent	M4(3)	Dual	SW/NW
	4.03	02.B	72.5	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 04	4.04	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
11001 04	4.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
	4.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	4.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	4.08	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	SW/SE
	5.01	01.A	53.1	2	1	2	Social Rent	M4(2)	Dual	SW/NW
	5.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
	5.03	02.B	72.5	2	2	4	Social Rent	M4(2)	Dual	NW/NE
	5.04	02.A	76.3	2	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 05				2	2	4				,
	5.05	02.A	76.3	3	2	4	Social Rent	M4(3)	Dual	NE/SE
	5.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	5.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	5.08	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	SW/SE
	6.01	01.A	53.1	2	1	2	Intermediate	M4(2)	Dual	SW/NW
	6.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
	6.03	02.B	72.5	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	6.04	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 06	6.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
	6.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	6.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	6.08	02.A	76.3	3	2	4		M4(2)	Dual	SW/SE
				2	1	+ 2	Intermediate			
	7.01	01.A	53.1	4	1	۲ ۲	Intermediate	M4(3)	Dual	SW/NW
	7.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
	7.03	02.B	72.5	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 07	7.04	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	7.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
	7.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	7.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	7.08	02.A	76.3	3	2	4	Intermediate	M4(2)	Dual	SW/SE
	8.01	01.A	53.1	2	1	2	Intermediate	M4(3)	Dual	SW/NW
	8.02	03.B	88.2	4	3	5	Social Rent	M4(3)	Dual	SW/NW
	8.02	03.B	72.5	3	2	4		M4(2)	Dual	NW/NE
			76.3	3		4	Social Rent			
Floor 08	8.04	02.A		-	2		Social Rent	M4(2)	Dual	NW/NE
	8.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
	8.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	8.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	8.08	02.A	76.3	3	2	4	Intermediate	M4(2)	Dual	SW/SE

	9.01	01.A	53.1	2	1	2	Intermediate	M4(2)	Dual	SW/NW
	9.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
	9.03	02.B	72.5	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	9.04	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 09	9.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	, NE/SE
	9.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	9.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	9.08	02.A	76.3	3	2	4	Intermediate	M4(2)	Dual	SW/SE
	10.01	01.A	53.1	2	1	2	Intermediate	M4(2)	Dual	SW/NW
	10.02	03.B	88.2	4	3	5	Social Rent	M4(2)	Dual	SW/NW
	10.02	02.B	72.5	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	10.04	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 10	10.05	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
	10.06	01.B	51	2	1	2	Intermediate	M4(2)	Dual	NE/SE
	10.07	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	10.08	02.A	76.3	3	2	5 Л	Intermediate	M4(2)	Dual	SW/SE
	11.01	01.A	53.1	2	1	+ 2		M4(3)		SW/NW
	11.02	03.B	88.2	4	2	E	Intermediate Market	M4(2)	Dual	SW/NW
	11.02	03.B 02.B	72.5	4	3 1	3			Dual	NW/NE
		02.B 02.A	72.5	3	2	4	Market	M4(2)	Dual	NW/NE
Floor 11	11.04			3	2	4	Market	M4(2)		,
	11.05	02.A	76.3	3	2	4	Market	M4(2)	Dual	NE/SE
	11.06	01.B	51	-	1	2	Market	M4(2)	Dual	NE/SE
	11.07	03.A	89.7	4	3	5	Market	M4(2)	Dual	SW/SE
	11.08	02.A	76.3	3	2	4	Intermediate	M4(3)	Dual	SW/SE
	12.01	01.A	53.1	2	1	2	Market	M4(2)	Dual	SW/NW
	12.02	03.B	88.2	4	3	5	Market	M4(2)	Dual	SW/NW
	12.03	02.B	72.5	3	2	4	Market	M4(2)	Dual	NW/NE
Floor 12	12.04	02.A	76.3	3	2	4	Market	M4(2)	Dual	NW/NE
	12.05	02.A	76.3	3	2	4	Market	M4(3)	Dual	NE/SE
	12.06	01.B	51	2	1	2	Market	M4(2)	Dual	NE/SE
	12.07	03.A	89.7	4	3	5	Market	M4(2)	Dual	SW/SE
	12.08	02.A	76.3	3	2	4	Market	M4(2)	Dual	SW/SE
	13.01	01.C	51.8	2	1	2	Social Rent	M4(2)	Dual	SW/NW
	13.02	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Floor 13	13.03	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
11001 13	13.04	01.B	51	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	13.05	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	13.06	01.D	54.5	2	1	2	Social Rent	M4(2)	Single	SW
	14.01	01.C	51.8	2	1	2	Social Rent	M4(2)	Dual	SW/NW
	14.02	02.A	76.3	3	2	4	Social Rent	M4(3)	Dual	NW/NE
Floor 14	14.03	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
Floor 14	14.04	01.B	51	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	14.05	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	14.06	01.D	54.5	2	1	2	Social Rent	M4(2)	Single	SW
	15.01	01.C	51.8	2	1	2	Social Rent	M4(2)	Dual	SW/NW
	15.02	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
Flags 15	15.03	02.A	76.3	3	2	4	Social Rent	M4(3)	Dual	NE/SE
Floor 15	15.04	01.B	51	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	15.05	03.A	89.7	4	3	5	Social Rent	M4(2)	Dual	SW/SE
	15.06	01.D	54.5	2	1	2	Social Rent	M4(2)	Single	SW
	16.01	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NW/NE
	16.02	02.A	76.3	3	2	4	Social Rent	M4(2)	Dual	NE/SE
	16.03	01.B	51	2	1	2	Social Rent	M4(2)	Dual	NE/SE
	-	•	•		•		· · · · · · · · · · · · · · · · · · ·		•	
			Resi GIA: 8493	N. Habrm: 345	N. Bedrm: 231	N. Bedsp: 427	N. Homes: 114	M4(3)Qty: 11	Single Qty: 3	
		,	Social Rent: 6271	Social Habrm: 256	Social Bedrm: 176	Social Bedsp: 321	Social Qty: 80	Social M4(3) h: 6	Single %: 0.03	1,
									J	n/a
Total B8	N. Homes: 114	n/a	Intermediate: 1184	Intermediate Habrm: 46	Intermediate Bedrm: 26	Intermediate Bedsp: 52	Intermediate Qty: 20	Intermediate M4(3) h: 4	Dual Qty: 111	, u

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10/07/2020 EBURY BRIDGE ESTATE Detailed Application Mix Schedule

M4(3) homes N. Homes N. Apartment Types Resi GIA N. Hab. Rooms Dual Aspect Homes N. Bedrooms N. Bedspaces Tenure Total Area B7: 8127 Social Rent: 3850 Total Habrm B7: 331 Total Bedrm B7: 219 Total M4(3) h. B7: 12 Total Bedsp B7: 408 Total Units B7: 112 Social Rent: 158 Social Rent: 50 Social Rent: 108 Social Rent: 197 ocial Rent: 7 B7 112 107 n/a Intermediate: 41 Intermediate: 24 Intermediate: 1614 Intermediate: 65 Intermediate: 79 Intermediate: 1 Market: 108 Market: 70 Market: 132 Market: 38 Market: 4 Market : 2663 Total HabRm B8: 345 Total BedRm B8: 231 Total Area B8: 8493 Total BedSp B8: 427 Total Units B8: 114 Total M4(3) h. B8: 11 Social Rent: 256 Intermediate: 46 Social Rent: 176 Social Rent: 321 Social Rent: 80 Social Rent: 6 Social Rent: 6271 B8 114 n/a 111 Intermediate: 1184 Intermediate: 26 Intermediate: 52 Intermediate: 20 Intermediate: 4 Market: 43 Market: 29 Market: 54 Market : 14 Market: 1037 Market: 1 Total BedSp: 835 Social Rent: 518 Total HabRm: 676 Total Area: 16620 Total BedRm: 450 Total Units: 226 Total M4(3) h.: 23 Social Rent: 13 Social Rent: 10121 Social Rent: 414 Social Rent: 284 Social Rent: 130 Total Phase 1 226 17 218 Intermediate: 5 ntermediate: 2798 Intermediate: 111 Intermediate: 67 Intermediate: 131 Intermediate: 44 Market: 3701 Market: 151 Market: 99 Market 186 Market: 52 Market: 5