

Appendix 2b

Schedule of responses to Chelsea Barracks draft planning brief

ISSUE	REPRESENTATIONS (Summary and Source)	OFFICER RESPONSE
THE DRAFT BRIEF GENERALLY	<p>Concern that the City Council had already drawn up a planning brief without public consultation. Of particular concern is para. 1.2 which lists the scheme stakeholders but does not include local people. We believe that local people should beat the heart of any proposals. <i>(Pimlico and Knightsbridge Labour Party)</i></p>	<p>Officers have prepared a draft planning brief for the purpose of public consultation which was agreed by Committee on 27.4.06. Consultation lasted until 7 July. All comments received will be considered by the Committee and changes made to the draft brief as appropriate.</p> <p>Para. 1.2 states 'The City Council, in consultation with key stakeholders, is producing the planning brief for the site...' There is no list of stakeholders. The City Council considers local residents to be the most important of the key stakeholders, which include bodies such as the MoD, GLA, TfL, etc.. To this end 1100 local residents (including all those in flats off Ebury Bridge Road) and 8 local community groups have been contacted, a workshop session was also held with the South Area Forum. Consultation with local residents will continue throughout the progression of any proposed schemes for the site.</p>
	<p>The Partnership praises Westminster City Council for developing an excellent planning brief for the Chelsea Barracks site. The Partnership would welcome and support the redevelopment of this site if it follows this brief. <i>(South Westminster Renewal Programme)</i></p>	<p>Support welcomed</p>
	<p>A well formulated brief for developers and their agents. <i>(Thorney Island Society)</i></p>	<p>Support welcomed.</p>

I welcome the comprehensive nature of the above document in particular the housing policy aspects which are clearly London Plan compliant. It is unclear to me what is the document's status and advise that if it is a Supplementary Planning Document it should be mentioned within the Council's most recent Local Development Scheme. I further remind you that all Local Development Documents, including Supplementary Planning Documents must be in general conformity with the London Plan in accordance with Section 24(1b) of the 2004 Act.
(on behalf of the Mayor of London)

Pleased to see the Mayor's positive view of the draft brief.

Regarding the brief's status:

Para 2.43 of PPS12 reads as follows

Supplementary planning documents may cover a range of issues, both thematic and site specific, which may expand policy or provide further detail to policies in a development plan document. They must not however, be used to allocate land. *Supplementary planning documents may take the form of design guides, area development briefs, master plan or issue-based documents, which supplement policies in a development plan document.* The following principles apply to a supplementary planning document:

- i. it must be consistent with national and regional planning policies as well as the policies set out in the development plan documents contained in the local development framework;
- ii. it must be clearly cross-referenced to the relevant development plan document policy which it supplements (or, before a relevant development plan document has been adopted, a saved policy);
- iii. it must be reviewed on a regular basis alongside reviews of the development plan document policies to which it relates; and
- iv. the process by which it has been prepared must be made clear and a statement of conformity with the statement of community involvement must be published with it.

This brief is clearly not an area planning brief [see italic section]: it is a site brief. It is therefore not an SPD but merely a site brief. It is not really a planning policy document so much as an indication of WCC's vision and requirements for this specific site. The RUDP is in general conformity with the London Plan, and the contents of the brief are consistent with RUDP policy. It is not accepted that changes to the brief are required to ensure general conformity with the London Plan.

<p>We note that the Consultation draft brief has incorporated a number of our previous suggestions and in particular we welcome the increased flexibility in respect of affordable housing provision (paragraph 5.11) and residential density (paragraph 5.15) and we have addressed these issues further below. However it is our view that there is a clear opportunity to go beyond the development parameters described within the draft Brief and we encourage the City to acknowledge this potential explicitly within the document.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>The draft planning brief sets out the planning policies relevant to this site. These are the necessary parameters that will guide development. The importance of this unique site is recognised in the brief, for example:</p> <p>The draft brief states that the site ‘represents a significant opportunity for a landmark residential development, which relates sensitively to the surrounding historic townscape context, and exemplifies good and sustainable design practice. It goes on to say that the City Council expects that the ‘redevelopment will need to be of the highest architectural and urban design qualities’.</p>
<p>Ballymore supports the approach taken by the City Council in promoting a development brief for the site but have concerns that parts of the brief are overly restrictive and do not encourage the best use of this significant brownfield site to help to meet the City of Westminster’s pressing need for new housing.</p> <p><i>(Ballymore Properties Ltd)</i></p>	<p>Disagree. The City Council recognises the ‘pressing need for new housing’ and the draft brief seeks to maximise residential use on the site whilst at the same time ensuring that the development will be sustainable by ensuring that there are also services and community facilities on the site and that the design and layout of the site encourage a high quality of life for the new residents and for existing neighbours.</p>

Although there are abundant policies listed it is up to WCC to determine what facilities are to be included as part of an attempt to redress the lacks in adjoining areas. This cannot be second guessed by a potential developer. The fact is, the document has a lack of 'vision', little of the new community; being abundant on policies, which in this context are but the bits and pieces, and a long way short of an indication of a bright future. That would in part be aided by active propositions, and substantive stated requirements from the client body WCC, who have the over view of the situation.

The document is extremely well provided and indeed lavish with lists, procedures and policies - in fact most of the document is about all the varying kinds/types of 'regulations' requiring to be met by a developer for the 5.18 ha which has the presumption of being a site cleared of all buildings. Even so there are omissions regarding two pieces of factual information that are referred to and that should be provided; the location plan of the Chelsea-Hackney line protected route (11.3) and the area of potential flood risk in the Thames flood plain (11.5). The most significant omission is anything regarding the condition of the existing building structures. However the Brief is sadly lacking in 'vision' and any indication of positive provisions, expected by WCC.

I have three fundamental 'observations' at the way the 'Planning Brief' is presented. These relate to areas where I find the document inadequate, and dubious. These are described as - 1 Complete dismissal of the physical component, with no arguments put forward as to why wholesale demolition is the presumption. 2 The dismissal of the architecture as being of no merit. 3 No sense of any kind of 'vision' for the site and a possible solution.

An architectural appraisal should be undertaken of all the buildings. A willingness to actually look and see the qualities that exist is what is required, and a better understanding and empathy with the assets that exists, which have also a cost benefit dimension.

(Local Resident)

The purpose of the brief is to inform potential developers what the City Council wishes to see on the redeveloped site ie its vision for the site. The Planning and Compulsory Purchase Act 2004 does not give local planning authorities powers to build a community, but the City Council wishes to see a sustainable residential community in this area and services and facilities are an important component in seeking this. Consultation has indicated various preferences from the community and **the brief can now be amended to be more specific as to what community facilities will be required.**

Agree. **Include new map showing safeguarding line and the flood plain area.** The condition of the existing buildings is not relevant as the City Council will require that, with the exception of the chapel, they are demolished.

Reasons why demolition is required in the brief:

- i) the tower blocks are too high as they exceed all neighbouring building heights, and have a detrimental effect on the neighbouring conservation areas
- ii) the other buildings are considered of little architectural merit, are too low density in terms of the need to maximise the amount of housing on the site, and their preservation would compromise the proper planning of this site to achieve a cohesive well planned and designed development.

The draft planning brief sets out the planning policies relevant to this site. These are the necessary parameters that will guide development. The importance of this unique site is recognised in the brief, for example: The draft brief states that the site 'represents a significant opportunity for a landmark residential development, which relates sensitively to the surrounding historic townscape context, and exemplifies good and sustainable design practice. It goes on to say that the City Council expects that the 'redevelopment will need to be of the highest architectural and urban design qualities'.

No, for reasons i) and ii) set out above.

<p>This is one of the most important sites in the southern part of the City of Westminster due to redevelopment and to allow consultees only 7 weeks to come to a view on such a major project is, at best, unfortunate we strongly feel that a longer consultation period would have been preferable.</p> <p><i>(Westminster Society)</i></p>	<p>The draft planning brief public consultation lasted 15 May - 7 July, 8 weeks. Much of the content of the brief reflects UDP policy which has already been consulted on and agreed by members. Consultation will also take place on every planning application received for this site.</p>
<p>The draft Brief provides helpful guidance on the City's view of the perceived site constraints at the Chelsea Barracks site and how these may be dealt with. However, we suggest that the Brief can be bolder in acknowledging the significant opportunity at one of Westminster's most important residential development sites. In our view this can be achieved at Planning Brief stage by explicitly highlighting the opportunities for exceeding policy guidelines where a high quality scheme can demonstrate its merits. This approach may help to address any perceived contrast between the Council's and the Mayor's development capacity aspirations for the site.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>It is difficult to go further than existing para 5.15 regarding density which states:</p> <p><i>...development proposals for this site will be assessed primarily having regard to the proposed mix, bulk, layout and compliance with other relevant standards and policies set out in the UDP, including in particular the provision of public and private amenity space, design and conservation policies and sunlight/daylight controls. Proposals which satisfy these considerations may achieve the higher densities set out in the Mayor's London Plan.</i></p>
<p>I would like to commend you on the professional quality of the brief and its conscientious approach to this very important redevelopment. We commend your commitment to: a height ceiling for all new buildings, the use of materials of quality, underground parking, the establishment of green spaces and the saving of trees and railings.</p> <p><i>(Local Resident)</i></p>	<p>Support welcomed</p>
<p>The draft planning brief says that flats and houses should be the dominant land use but combined with some parks and a variety of school, health and other community buildings. Every other dwelling is intended to be affordable. High buildings are ruled out. The Chelsea Society supports this land use approach but would like to propose changes to the brief concerning design.</p> <p><i>(The Chelsea Society)</i></p>	<p>Support welcomed and concern noted</p>

<p>THE DEVELOPMENT OF THE SITE GENERALLY</p>	<p>I advise you that the above site is now proposed to be within the Victoria Area for Intensification in the Central London sub-regional development framework (published in May 2006) to the London Plan. As such, a more mixed-use development scheme will be expected rather than that proposed within the draft brief. Some commercial development should be accommodated on the site in strategic planning policy terms.</p> <p>The draft further alterations to the London Plan locates the site within the Central Activities Zone. I recognise that there might be a strategic planning policy conflict here because of your Council's emerging Replacement Unitary Development Plan and the affordable housing policy amendment that the Secretary of State directed your Council to make to the plan. Should a planning application be submitted prior to the formal publishing of the further alterations to the London Plan then the development plan status as it stands shall of course have greater weight. The delivery of more residential dwellings on-site and the required 50% quantum of affordable housing will, in my opinion, secure more strategic planning benefits.</p> <p><i>(on behalf of the Mayor of London)</i></p>	<p>At present the draft further alterations to the London Plan are just proposals, and as recognised by the Mayor in his comment</p> <p><i>'Should a planning application be submitted prior to the formal publishing of the further alterations to the London Plan then the development plan status as it stands shall of course have greater weight.'</i></p> <p>The City Council acknowledges that there may be a planning policy conflict but note and welcome the Mayor's conclusion that</p> <p><i>'The delivery of more residential dwellings on-site and the required 50% quantum of affordable housing will, in my opinion, secure more strategic planning benefits.'</i></p>
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The opportunity provided to Westminster and the adjoining areas by the sale and development of Chelsea Barracks, should provide for an exemplar urban design project commensurate with London's status as a World City. The draft planning brief appears to consider the site as a suburban residential enclave at the back door of "South Victoria". The provenance and presence of the site as it joins Chelsea and the Royal Hospital and its gardens, as well as its relationship to the River, Chelsea Bridge, Battersea Park and the ultimate development of Battersea Power Station, is key to the realisation of a project of real amenity and meaning for this area of London. The draft planning brief does not relate to the expectations or policies of the GLA or those of Central Government for the effective use of the scarce resource of urban land. It would be entirely inappropriate and regrettable if the Barracks site were to be developed in the manner of its near neighbours at Grosvenor Waterside or worse still Chelsea Bridge Wharf. Medium-rise housing with inadequate urban amenity that contributes nothing to this special location.

The Chelsea Barracks site presents a rare opportunity in the midst of some of the finest urban villages in the world. The brief should encourage prospective purchasers to commit to creating a **vision** for the site commensurate with its neighbours, Belgravia and Chelsea. If development of the site is to be truly sustainable in the context of Westminster and contribute to London as a whole, the planning brief should not rely on the restrictions of policy but rather encourage the realisation of **vision**.

(Local Business)

The area surrounding Chelsea Barracks is an overwhelmingly residential area between the commercial area in Victoria and the residential and retail areas in Kensington and Chelsea. The draft brief follows the advice set out in the London Plan and government guidance. The City Council would like this to be an exemplar of high quality, sustainable design in urban living.

The draft planning brief necessarily sets out the planning policies relevant to this site. These are the parameters that will guide the evolution of proposals, but these are not intended to restrict 'vision'.

<p>Rather than a presumption of 'clear all', and where on the one hand WCC pursues and advocates increasing awareness of recycling and sustainability, it is totally ignored or forgotten for a site of over 5 hectares - except urging protection for the trees. (The latter is the one element that costs least and can be regenerated easiest in relatively short time - not that I advocate destruction, only to point to an inconsistency). I would have expected to see a schedule of the buildings, and their current uses. An investigative survey providing statement on the condition and structure should be required of the developer. In such an exercise structural condition is a prerequisite, along with an understanding of bringing the existing structures up to current building regulation requirements. Since the Brief presumes/requires the site to be predominantly developed for housing, and since the predominant use of the existing buildings is residential, it is all the more curious that no word is given to investigating the the possible reuse of these buildings. It must be deemed an obligation of Westminster City Council, to require the carrying out of such an exercise, which should consider environmental sustainability, with reference to the considerable amount of demolition material to be 'carted away' if demolition were the ultimate proposition. One cannot but conclude that The Planning Brief should therefore be expected to include the 'presumption' that where reasonably possible, and in accordance with the revised land use circumstances, uses for as many of the existing buildings that could be refurbished, should be proposed.</p> <p><i>(Local Resident)</i></p>	<p>Do not agree, see response on page 4 above, and comment below referring to 'eyesore'. Much of the existing building materials can be recycled on-site rather than being 'carted away', this is included in the planning brief in the Sustainable Design and Construction section.</p>
<p>The Chelsea Barracks have always been an eyesore; their disappearance will not be mourned. Their replacement, however, is a great concern to us all. Ranelagh Grove could be changed forever; what remains of its quiet back-street atmosphere could be shattered by the redevelopment.</p> <p><i>(Local Resident)</i></p>	<p>Agree.</p>

<p>The residents of Bloomfield Terr, Ranelagh Grove and St Barnabas St are growing increasingly anxious over the Chelsea Barracks development and do not want to be railroaded into plans which are unsuitable to this very special part of central London. So far we have had one letter and am unable to download brief. Can you confirm that all considerations and decisions will be fully shared with the residents of this area before final plans are passed.</p> <p><i>(Local resident)</i></p>	<p>All comments received will be considered by the Committee and changes made to the draft brief as appropriate. Consultation with local residents will continue throughout the progression of any proposed schemes for the site, and all neighbours will be notified of any applications upon receipt, at which stage any views expressed on the proposals will be considered by the Committee when determining planning consent (or refusal).</p>
<p>We believe that the brief, while drawn from the City Council's policies, does not fully reflect the importance of the site as perhaps the biggest redevelopment opportunity in the City. We also believe that it needs to take account of the complementary facilities, particularly in respect of open space, offered in the adjoining boroughs of Wandsworth and Kensington and Chelsea.</p> <p><u>Paragraph 5.2</u> As the site is located outside the Central Activities Zone it is recognised that it is not a suitable location for certain large scale commercial uses such as offices. However, the provision of small scale commercial uses which are appropriate to the locality are consistent with the character of the site and as they can contribute to an appropriate mix on a large scale predominantly residential site such uses should not be ruled out. Uses could include serviced apartments or boutique type hotels which could be demonstrated to raise negligible conflict with surrounding residential uses and which are consistent with the offer of Central London as a whole. The provision of suitable non-residential uses within large residential schemes is endorsed within the London Plan (policy 3A.5).</p> <p><i>(Grosvenor)</i></p>	<p>Disagree. The importance of this site is recognised in the brief, for example: The draft brief states that the site <i>'represents a significant opportunity for a landmark residential development, which relates sensitively to the surrounding historic townscape context, and exemplifies good and sustainable design practice. It goes on to say that the City Council expects that the 'redevelopment will need to be of the highest architectural and urban design qualities'.</i></p> <p>The draft brief does take into account community facilities in neighbouring locations. RBK&C have informed us that their nearby schools are all at capacity. As regards open spaces this area is in an area deficient in open space and playspace. Ranelagh Gardens has restricted opening times and its one entrance is over 1 km away from the northern tip of the site at Ebury Bridge Road. Nor does it permit sport/active recreation. Battersea Park in Wandsworth, whilst being a large and popular park, is some 800m from the northern tip of the site at Ebury Bridge Road; there is a real lack of small local and local parks in this area, and Mayoral guidance says residents should be within 400m of these two types of park. This has been verified by an open space study carried out in 2004/5, using the methodology set out in the Mayor's Best Practice Guidance, which was used to inform the draft open space strategy (due to be published in December 2006). The City of Westminster UDP has designated the CAZ and CAZ frontages for commercial uses. Outside CAZ only community facilities, including shops and services, are permitted in large residential sites.</p>

<p>That the Section 106 (planning gains) be balanced between the various local needs and the requirement for affordable housing, to ensure that what is provided is good quality and that a good balance of facilities is provided. <i>(Pimlico & Knightsbridge Labour Party)</i></p> <p>The site is currently in public ownership and that in the sale of the site weight ought to be given to criteria in developers offers that provide local benefit, i.e. the price should not necessarily be sold to the highest bidder regardless of their objectives. <i>(Pimlico & Knightsbridge Labour Party)</i></p> <p>That young people not just those over voting age should also be engaged in the development process, possibly through presentations and consultation in local schools and youth groups. <i>(Pimlico & Knightsbridge Labour Party)</i></p> <p>The development should be a sustainable, balanced mixed, development with residential use (not an enclave of posh houses) side by side with small commercial units and some retail (local shops not antique shops), cafes and open spaces. This will ensure a 'community feel'. <i>(Pimlico & Knightsbridge Labour Party)</i></p>	<p>Agree. This will be vital in developing a successful scheme for the site.</p> <p>This is a matter beyond the City Council's control. However, the role of the planning brief is to set out the Council's policy requirements (including community benefits) for the site. The brief will therefore be an important component in determining what community benefits will be included in the final scheme, regardless of the price paid for this site.</p> <p>The City Council will be happy to engage with local young people when drawing up detailed plans for community facilities which they may use.</p> <p>Residential with some retail reflects the draft brief. The draft brief does not encourage small commercial units as this would be contrary to policy for outside CAZ, however any applications including such uses will be assessed on their merits. It is not possible for the planning authority to specify the occupiers of retail units but one could design units so as to be suitable for convenience stores, and could encourage the developer to seek such occupiers in the development.</p>
<p>The American Embassy proposed development on this site would intrude and almost destroy the small enclave of shops off the Pimlico Road. One only has to look at what the traffic diversions have been like around Grosvenor Square. It would be a huge detriment to this area. <i>(Local resident)</i></p>	<p>The development of an embassy on this site would be contrary to UDP policy as such uses are not permitted outside the CAZ.</p>
<p>I would consider the relocation of the American Embassy to be a most unwelcome use of the site and the security involved in having the American Embassy on the Chelsea site would have a serious detrimental affect on the business and residential communities in the immediate vicinity. <i>(Local resident)</i></p>	<p>The development of an embassy on this site would be contrary to UDP policy as such uses are not permitted outside the CAZ.</p>

<p>In respect of the proposed uses of the site, the Society supports the underlying assumption that the redevelopment will be predominantly for residential use within a “mixed use” envelope. We would urge that “mixed use” in this context should allow for modest office use alongside modest retail and Class A3/A4/A5 uses; we would see no justification for the provision on site of either significant office use or a substantial retail or entertainment outlet, subject to comments that follow about access to public transport.</p> <p><i>(Westminster Society)</i></p>	<p>UDP policies prevent the introduction of new office use outside the CAZ unless they are essential to providing services to the local community service. Substantial entertainment uses outside the CAZ are also prohibited. This will essentially be a residential site with supporting community uses, including a small number of shops.</p>
<p>We would like to be fully involved in the development of the site, in particular the discussions around on-site community facilities. We would be happy to meet with officers to discuss our response in more detail.</p> <p><i>(The Westminster Bangladeshi Association and the Westminster Muslim Welfare Trust)</i></p>	<p>Noted</p>
<p>From very early consultation it appears the main concern is, not unexpectedly, the lack of infrastructure for the proposed new development. Roads , Schools etc.</p> <p><i>(Cllr Tony Devenish)</i></p>	<p>The development must provide infrastructure to acceptable standard – planning brief addresses this issue.</p>
<p>The development must provide sufficient infrastructure and local facilities.</p> <p><i>(Cllr Frances Blois)</i></p>	<p>The development must provide infrastructure to acceptable standard – planning brief addresses this issue.</p>

HOUSING	<p>Strong support for a major residential development, support for affordable housing, like to maximise key worker housing within this element. <i>(South Area Forum)</i></p> <p>Concern expressed by one person as to whether such a large number of social housing units would increase crime and anti-social behaviour in the area. <i>(South Area Forum)</i></p>	<p>Support welcomed. The brief refers to up to 30% of the affordable housing being for key workers or other intermediate housing for other target groups. The exact number and nature of the key worker element will need to be decided at scheme stage as there are several factors to be taken into account including Housing Corporation Funding and affordability.</p> <p>Good design and layout, together with security measures will limit opportunities for crime and anti-social behaviour. A broad mix of unit sizes and age and demographic profiles in the affordable sector will contribute to the creation of a mixed sustainable community. Additional recreational opportunities for children and young people both on site and in the neighbourhood will also reduce the propensity for anti-social behaviour.</p>
	<p>The scheme should comprise 50% affordable homes. Does it help achieve this that the tower blocks were once residential, despite MoD classification was not as 'residential' ? <i>(Pimlico and Knightsbridge Labour Party)</i></p> <p>That homes for key workers should be given priority <i>(Pimlico and Knightsbridge Labour Party)</i></p> <p>That a planning condition should be imposed on the site restricting a proportion of homes, private and affordable) to people who live and work in the borough. Also would it be possible to have particular preference on allocation to people living locally as opposed to Citywide eg young adults living at home with parents in Churchill Gardens, Ebury Bridge, and Tachbrook estates? <i>(Pimlico and Knightsbridge Labour Party)</i></p> <p>Provision for sheltered accommodation for elderly people <i>(Pimlico and Knightsbridge Labour Party)</i></p>	<p>Welcome support for the 50% affordable housing element set out in the brief. The Mayor also wishes to see 50% affordable housing on this site and has the power to determine applications on this site This will help ensure that the appropriate level of affordable units is achieved on this site.</p> <p>Within the Intermediate category, homes for key workers will be the priority. In accordance with UDP policy, within the affordable element as a whole, housing for those in need must take priority</p> <p>Currently, this is not possible but the Westminster Housing Commission has recommended that:</p> <ul style="list-style-type: none"> - the residency requirement for social housing should be extended from '6 out of 12 months' to '18 out of 36 months, and also - further investigation into using the Dolphin Square Charitable Foundation to finance low cost equity loans to enable home ownership for public or private sector workers in Westminster within fixed income bands. <p>Brief already includes a requirement for 50-60 'extra care' dwellings for older people.</p>

<p>The housing proposals in the brief would address many of the key issues that the Partnership has identified in the past. The requirement for 50 percent of the housing to be affordable, shows real intent to address the need for more affordable homes in the area.</p> <p>The Partnership welcomes that a third of all properties will be of family size, as many families in south Westminster live in overcrowded conditions. However the brief does not mention the negative impact of high-rise living on families. It is not clear what height of building will be permitted on the site, but if the majority of the housing is to be at least two bedroom and up to four bedroom, the Partnership would like to see as much low rise as possible. The brief states that 'where possible the housing should be designed and located to avoid polarisation'. On a site that offers in effect a blank canvas, the Partnership doesn't see why this shouldn't be possible, and looks forward to seeing innovative design proposals to make best use of the space.</p> <p>The Partnership would also like to see priority for tenancies in the new affordable housing to be given to residents living in south Westminster (who have priority for re-housing). In 2005 Westminster City Council piloted a successful 'local lettings scheme' in SW1 (in partnership with a local Housing Association), which could be replicated for this development.</p> <p><i>(South Westminster Renewal Programme)</i></p>	<p>Noted</p> <p>Low rise is limiting and will deliver less affordable housing. This site needs to be medium rise in order to maximise number of housing units whilst reflecting the neighbouring townscape and building heights.</p> <p>It is likely that the City Council will adopt a balanced approach to lettings of the affordable element , ensuring that a proportion of these units are targeted at existing residents in priority re-housing need</p>
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<p>Paragraph 5.11 states that the affordable housing mix and tenure split will be assessed taking into account viability and local need at the time of consideration of any planning application. We welcome this flexible approach to affordable housing.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p> <p>The flexibility in respect of affordable housing mix should be extended to include the private mix of residential units so that viability and need can also be taken into account. Furthermore, we suggest that the viability case is a key issue that should also be highlighted at the Summary of Development Opportunities (paragraph 3.2i) and the Residential Uses sections (paragraphs 5.3 and 5.4).</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>Support welcomed.</p> <p>Private housing mix will be determined by policy considerations, housing needs data, and viability issues. Disagree that 'viability' should be included in the 'Summary of Development Opportunities'. Viability is already referred to in para. 5.6.</p>
<p>Para. 5.5 The final sentence suggests that the City will insist that the majority of affordable housing must meet the needs of Westminster residents only. It should explain how this is to be achieved. The Royal Borough would be interested to know whether its own residents in need could qualify given the site's location on the borough boundary. By its nature, the restriction should not extend to the allocation of key worker accommodation.</p> <p><i>(Royal Borough of Kensington & Chelsea)</i></p>	<p>Westminster's needs in terms of social housing far outstrips the provision that this site may yield. Therefore all social housing will need to meet the social housing needs of the City Council. However, there may be opportunities for key workers from other LA areas, should as a condition of Government funding of these units the nominating agency (Zone /Homebuy Agent) be able to nominate key workers from across London</p>

<p>The numbers for affordable housing units are satisfactory but it would be better if the unit mix was more prescriptive. <i>(Octavia Housing)</i></p> <p>As the scheme is likely to be high density, the brief should state that applications will need to comply with the Housing Corporation requirements for affordable housing including high HQN scores, very good eco homes standard and the NHF high density housing planning brief. this should ensure slightly larger flat sizes and balconies and amenity areas. <i>(Octavia Housing)</i></p> <p>The brief should state that there will be a requirement for a lettings and management plan including dealing with how service charges can be affordable to residents <i>(Octavia Housing)</i></p> <p>Support extra care requirement but in addition to self contained units this should also refer to other associated support facilities. <i>(Octavia Housing)</i></p>	<p>Unless there are updates in evidence base and policy, or mayoral or other advice, policy H 5 regarding housing mix will apply.</p> <p>In order to secure adequate public subsidy an RSL will need to demonstrate to the Housing Corporation that the affordable housing proposed meets their Scheme Design Standards and good Housing Quality Indicator scores. The housing Corporation publishes clear guidance on the appropriate sizes of units, and amenity space. The provision of balconies will be one measure of demonstrating amenity space. Will add reference to eco home standard and NHF publication.</p> <p>Developers are recommended to enter in to partnership with RSL partners at the earliest opportunity to ensure that the level of service charges remain affordable. Amend brief to emphasise the issue of real affordability not just the provision of “affordable units”. Developers should be minded to note the current rent regimes operated by RSLs as permitted by the Housing Corporation so that the addition of high service charges do not result in poverty traps being created in affordable blocks.</p> <p>Yes, will add to brief.</p>
<p>Affordable Housing should be allocated to people born in this country .</p> <p><i>(Local resident)</i></p>	<p>Allocation of affordable housing will be carried out in accordance with the City Council’s Statutory duties, defined by Government legislation and for those existing residents with proven housing need .</p>

<p>I am extremely concerned that there will be pressure to provide more than the suggested 50% of affordable housing. We already have substantial affordable housing in this area already - the south of the development is almost all social housing bar one set of private apartments and the peabody have a large presence on the north side also along the Pimlico Road.; the Churchill ward (to include the Pimlico side) also has extensive affordable housing. I would be interested to know if there is any ratio accorded to private versus affordable in any one area. <i>(Local resident)</i></p>	<p>Concern noted. There are no such ratios in existence.</p>
<p>Housing mix/family housing There are many Muslim families living in overcrowded conditions in south Westminster e.g. it is common for six person households (2 adults and 4 children) living in two bedroom flats. We believe that more four bedroom properties are required on the site to meet the needs of large households living in unsuitable accommodation locally. <i>(The Westminster Bangladeshi Association and the Westminster Muslim Welfare Trust)</i></p>	<p>At present the brief reflects UDP policy that 5% of the family units should be 4 beds or more. However, new Housing Needs Study (currently still in draft) indicates that higher proportion of 4 beds are required –25% of family homes in the social sector. Draft PPS 3 (Dec 2005) places a strong emphasis on the importance of local ‘Assessments of Housing Need’ in underpinning housing policy. Amend brief.</p>
<p>Para.5.13 – 5.14 Special needs and lifetime homes. Is the potential use of new technology to future proof the development. Including the use of broadband and wifi networking. For older residents scope to monitor and provide medical services. Again scope for exemplary and best practise opportunity. <i>(Sustainability Appraisal/Strategic Environmental Assessment Officer City of Westminster)</i></p>	<p>Agree, best practice ‘assistive technology’ should be incorporated in special needs housing. Include in brief. It may be that contemporary best practice will advise that all new residential units should be thus equipped, if so this will need to be incorporated at the design stage.</p>

<p>Para. 5.6 add after 'provided on site' "and in such position so that(as far as possible) it is integrated with all other residential uses within the site" <i>(Cllr Alastair Moss – Chairman for Planning and City Development Committee)</i></p> <p>Para. 5.9 add the words 'and the developer should ensure that due regard is paid to the recommendations of this Commission, on the assumption that the Commission will have reported by the time that an application for the development of the site is submitted' <i>(Cllr Alastair Moss – Chairman for Planning and City Development Committee)</i></p>	<p>The nature, siting/dispersal of the affordable housing will need to be discussed and agreed with partner RSLs. Due to the efficiencies of management and the need to limit service charges, RSLs will not want to see AH units pepperpotted throughout the scheme, which would prejudice affordability. However, opportunities may exist for individual AH blocks to be located throughout the site.</p> <p>Commission has now published its report, and the City Council will be considering its findings over the coming months. Amend brief to update to latest position in para. 3.3. State in para. 5.9 that the Commission's findings may have implications for this site.</p>
<p>Here is an opportunity for WCC to be pro- active and to set higher standards which might seek to bring 'Parker Morris' up to the twenty first century, in recognising the rather different spatial needs. <i>(Local resident)</i></p>	<p>New affordable housing needs to meet Housing Corporation Scheme Design Standards, which are based on an updated Parker Morris standard. The design of the new units will need to comply with the new City of Westminster SPD on 'Design Matters in Residential Units' due to be published in early 2007.</p>
<p>The Society supports the highest feasible level of "affordable" or "key worker" housing on site, if possible within the realities of the property market of up to 50%, preferably, we would like to see a greater degree of integration of "market" and "affordable" housing within the development than has been the case elsewhere in Westminster. A broad mix of unit types will be required including a substantial provision of 1-bed units for people who will use the accommodation as a "working week" London base as well as a quantity of substantial family units (3 and 4-bed) if permanent residential bases are to be encouraged. <i>(Westminster Society)</i></p>	<p>Support for 50% affordable housing welcomed. The nature, siting/dispersal of the affordable housing will need to be discussed and agreed with partner RSLs. 'Pepperpotting' may not be feasible due to the high service charges linked to the market dwellings, but dispersal of individual blocks of affordable units throughout the site may be more so. The mix of unit sizes in each sector will need to reflect UDP policy, the latest housing need analysis, and viability issues.</p>

<p>Paragraph 5.11 states that the affordable housing mix and tenure split will be assessed taking into account viability and local need at the time of consideration of any planning application. We welcome this flexible approach to affordable housing.</p> <p>The flexibility in respect of affordable housing mix should be extended to include the private mix of residential units so that viability and need can also be taken into account. Furthermore, we suggest that the viability case is a key issue that should also be highlighted at the Summary of Development Opportunities (paragraph 3.2i) and the Residential Uses sections (paragraphs 5.3 and 5.4).</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>Noted.</p> <p>The 'Summary of Development Opportunities' is just that and it would not be appropriate to include viability considerations, however it might be useful to amend 3.2 (ii) to include the issue of mix of units reflecting needs across the different sectors. Viability issue is already cited in para. 5.6.</p>
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Affordable housing Paras 5.5-5.9 Meeting housing needs is increasingly complex given the wide range of development costs now and in the future. For example, achieving emerging energy targets will increase costs and the City Council is seeking other planning advantages. The Brief should give explicit recognition to the balance to be struck between various policy objectives and the consequential costs and assessment of the financial implications of doing so.

The test of maximum reasonable provision should be made clear as opposed to a fixed 50% requirement based upon financial appraisals.

There is increasing polarisation in London housing markets. This has significant implications for the social and economic sustainability of new communities and the serious lack of supply in the intermediate sector, which is of particular importance to the Central London economy. Greater emphasis on this sector is needed, a matter considered by the City Council's Housing Commission.

Grant availability Greater emphasis needs to be placed on the significance of grant availability to the viability of affordable housing provision.

Basis of measurement - Para 5.6 states that the number of units will be used as the basis for measurement of the provision of affordable housing. Given the size of the site it may be more appropriate to calculate the level of affordable housing provision on other bases, such as habitable rooms and / or floorspace as set out in the relevant London Plan SPG.

(Grosvenor)

The City Council does not consider meeting energy targets and creating a sustainable development, a planning gain, rather it is something government wants all new developments to address. Other matters which are considered to be planning gain, for example those set out in Sections 5 and 6 of the draft brief, will be taken into account when assessing overall viability of the scheme.

No, this would not comply with the City of Westminster policy or that of the Mayor, set out in the London Plan.

Provision of Intermediate Housing is problematic in Westminster due to affordability issues. The Intermediate housing component of the development will need to be finalised at a later stage and will be dependent on such matters as findings of the Housing Commission, the latest needs and demand Assessments, the latest Housing Corporation funding regime, and any new advice from the Mayor.

Noted, but this issue will be considered along with other viability issues.

The mix of units will be considered at scheme stage according to policy and need at that time. The Council will of course be reasonable and fair when calculating the proportion of affordable units. Floorspace may be considered in the calculation if it is deemed appropriate and policy permits.

<p><u>Tenure Split</u> Para 5.5 expects the majority of affordable housing (at least 70% of total housing) to be for social housing. Prescribing at least 35% of the 50% affordable housing targeted for residents in need and 15% intermediate housing for key workers is premature in view of the fact that the findings of the Housing Need Study have not yet been published. The potential for a greater emphasis towards key worker dwellings should be recognised. This approach accords with the Replacement UDP which provides a guideline for the tenure split of affordable housing rather than a minimum requirement, seeking to be guided by Housing Needs Assessments to ensure that the mix of affordable housing provided meets the immediate and longer terms needs of the City. The potential for additional key worker units is acknowledged where more than 30% affordable housing is provided.</p> <p><i>(Grosvenor)</i></p>	<p>Proportion of key worker homes is unlikely to rise above 15%. This is in line with Mayor's policy . The additional key worker units referred to in policy H4 para. 3.70, refers to the 5% baseline which is normally requested. However, as stated above, the Intermediate housing component of the development will need to be finalised at a later stage and will be dependent on such matters as findings of the Housing Commission, the latest needs and demand assessments, the latest Housing Corporation funding regime, and any new advice from the Mayor.</p>
<p><u>Affordable Housing</u> – the affordable housing requirement should be applied flexibly and be consistent with both local and strategic planning policy. Consequently, notwithstanding the Council's UDP policy, reference should be made in the brief to viability and the development control toolkit playing an important role in establishing an appropriate quantum mix and tenure of affordable housing.</p> <p><u>Housing Mix</u> – an appropriate private housing mix over the site needs to be assessed having regard not only to housing need but also viability.</p> <p><u>Housing Density</u> – It is acknowledged that density will be assessed primarily having regard to the proposed mix, bulk, layout and compliance with other relevant standards rather than a prescribed density figure. This approach is supported.</p> <p><i>(Ballymore Properties Ltd)</i></p>	<p>Brief already refers to viability in para. 5.6.</p> <p>Private housing mix will be determined by policy considerations, housing needs data, and viability issues.</p> <p>Support welcomed.</p>

	<p>It should be noted that the site is already bounded by the Peabody Flats to the south and the Guinness Buildings and Cundy Street flats to the north. If 50% of the units on the site are to come within the description of affordable housing this would create an imbalance against other properties in the immediate area. Consideration should be given to the possibility of this resulting in an increase in local crime. For example, in a report by the Metropolitan Police for the Borough of Kensington and Chelsea's Policy Plan 2004/2006 it has been revealed that the Worlds End Estate is classified as a robbery hotspot with a high level of street crime, and any development, which lends itself to this possibility, should be avoided.</p> <p><i>(Local resident)</i></p>	<p>Concern noted.</p>
<p>OPEN SPACE</p>	<p>Very strong support for public open space on this site. <i>(South Area Forum)</i></p> <p>Would like separate spaces for: garden for sitting; play areas for toddlers, middle years, and teens; sport/kickabout pitch; natural area, and facility for dog walkers. Example of St Luke's Playground (in K&C) was given as a model. <i>(South Area Forum)</i></p>	<p>Support welcomed</p> <p>Agree some separation of open spaces for active and passive recreation is desirable.</p>
	<p>A new school could be combined with the public open space requirement and facilities that could also serve surrounding schools that are under provided in terms of playgrounds and sports space. <i>(Pimlico & Knightsbridge Labour Party)</i></p> <p>A children's playground is needed. <i>(Pimlico & Knightsbridge Labour Party)</i></p>	<p>Agree multi-use of open space is desirable.</p> <p>Play facilities are included in the draft brief.</p>
	<p>Para. 3.2 (v) add the words 'and reflecting the current large proportion of open space at the site.</p> <p><i>(Cllr Alastair Moss – Chairman for Planning and City Development Committee)</i></p>	<p>Agree. Change 3.2 (v) as follows: 'Take into account the City Council's Open Space Strategy (currently in draft) by providing a substantial element of public open space, reflecting local need and deficiency and the large proportion of open space currently on the site.</p>

<p>We suggest that a stated minimum provision of 0.8ha of open space is inappropriate at Planning Brief stage. Instead this figure should be clarified as being a guideline for assessment of planning application proposals alongside all other planning requirements for the site.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>No, policy for open space is that all should be protected. Currently there are 1.2 ha of open space on this site (Parade Ground plus small playground) therefore 0.8 is not at all unreasonable. The minimum size of a small local park is set out in the London Plan as 0.4 ha. As the open space will need to serve both tranquil and active uses (and are likely to be separated as such) a minimum allocation of 0.8ha in total is considered reasonable.</p>
<p>Para 5.17 It is unclear why it is important to locate the new public open space as far away from the public entrance to Ranelagh Gardens as possible, as stated in the brief, or the need of several smaller spaces interspersed around the site. The Royal Borough supports the consolidation of a large open space, located adjacent to Chelsea Bridge Road. This would have several advantages:</p> <ul style="list-style-type: none"> ▪ maintain the sense of openness that characterises Chelsea Bridge Road ▪ reflect the former use of the area as a parade ground ▪ offer a green connection/ wildlife corridor between Ranelagh Gardens and the site ▪ avoid any amenity issues of existing residents, and ▪ ensure the space is next to a main public route for personal security issues. <p><i>(Royal Borough of Kensington & Chelsea)</i></p>	<p>In terms of usage and need, the main concentration of residents are to the east of the site, these residents do not have access to parks or gardens locally. In addition Ranelagh Garden lies along Chelsea Bridge Road and so there is already an existing facility at this location. However, agree that in design terms a formal square type open space may well be desirable in place of the existing parade ground. The optimum solution is therefore to have two main public open spaces. One on the east side space for recreation such as a play area, kickabout area, and more subdued relaxed areas incorporating features of nature conservation value; and a more formal, quiet space fronting Chelsea Bridge Road.</p>

<p><i>Paragraph 5.16 – 5.18 and 6.8</i> The brief should recognise that the upgrading and enhancement of existing open space is equally important in meeting public open space requirements as the creation of new space. Additionally, a flexible approach should be adopted taking account of other facilities provided on site. For example, any provision of indoor community facilities such as sports halls or crèches should be considered as part of the overall provision of playspace in recognition of their role in meeting the varied needs of the local community.</p> <p>In terms of amenity space for individual homes, the brief should further refer to the ability for amenity space standards to be met through the provision of balconies and roof gardens as advocated within the UDP.</p> <p>Care is needed in distinguishing between private and public open space. The provision of general public open space can cause significant implications for the delivery of development. <i>(Grosvenor)</i></p>	<p>Upgrading and enhancement of existing space is important when dealing with smaller scale developments which cannot be expected to provide on-site public open space. The barracks site is in an area of both open space and playspace deficiency and provides a unique opportunity to provide public open space. The provision of indoor facilities should not mean a reduction in our targets for external open space. The site already has 1.2 ha of open space onsite – UDP policy protects all open space. It is therefore not appropriate for the brief to state that upgrade of existing open space will be acceptable as an alternative to the provision of public open space onsite. The provision of generous open space on the site is not only important in land use terms but of critical importance in townscape / urban design terms in view of ensuring the site's re-development fits comfortably within its context along Ranelagh Gardens, Duke of Yorks, Royal Avenue etc. Amend brief to further underline the importance of the provision of external open space, and to state that public open space should visually read as such and not be over-shadowed or annexed by the private realm which may adjoin it.</p> <p>Balconies and roof gardens are referred to in para. 5.12. Add reference to policy in text.</p> <p>Noted</p>
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	<p>The Partnership is pleased that the brief requires high quality accessible and safe communal amenity space and private open space to be included in the development. The Partnership believes that landscaping and amenity space should be incorporated sensitively and imaginatively into all new developments locally (regardless of type e.g. housing or retail) as the area has few gardens and limited public access to open space. Residents have also highlighted the need for more open space and greening initiatives to improve the 'liveability' of the neighbourhood and the sense of well-being for local people. There has also been a lot of community interest in gardening projects, including allotments. Given that there are no allotments in Westminster, would it be possible to include space for a pilot allotment site within the development? There are many different options available, for example, allotments can be created on rooftops, in raised planters.</p> <p>The Partnership hopes that the communal space will be large enough to include play space for children and amenity space for the community in general, without conflict of use.</p> <p>The Partnership is pleased that the landscape designs will incorporate diverse planting, areas of wildflower meadow planting and that building design should enhance biodiversity and the quality of the natural environment. (<i>South Westminster Renewal Programme</i>)</p>	<p>Allotments (allocated to individuals) would not be an appropriate use of land on this site. A community garden serving local residents on and off the new site may be feasible but would take space away from other uses such as playspace; though it may be possible for this use to be part of a 'living roof'. This could be discussed at a later stage; but due to security concerns would be likely to be only for residents of the site. It may be better to look at the feasibility of using some land on nearby housing estate land for this purpose. Insert reference to possibility of a community garden in paras. 5.18 and 9.7.</p> <p>Yes, brief makes provision for two spaces for active and passive use respectively.</p> <p>Support welcomed</p>
<p>RETAIL</p>	<p>Small shop units only, except: Strong support for a new supermarket eg. Sainsburys Local or Tesco Metro or Somerfield as there's nowhere to buy food at a reasonable price. (<i>South Area Forum</i>)</p>	<p>Reiterate that only small shop units would be acceptable along the Pimlico Road frontage. A small supermarket (without customer parking) may be acceptable at the northern end of Ebury Bridge Road. Any proposal would need to provide a Traffic Impact Statement and servicing details; and a retail impact study referring to the effect on the Ebury Bridge Road Local Centre.</p>

<p>5.23 The brief seems to contradict itself as to whether A3 activities would be acceptable within the development. The Royal Borough supports small scale retail, café and restaurant uses, which characterise both Pimlico Road and its junction with Lower Sloane Street. Shops and services are not appropriate on the Chelsea Bridge Road frontage for design, servicing and traffic reasons. Supermarkets should be resisted, unless metro sized and located on Ebury Bridge Road, and subject to suitable off-street servicing.</p> <p><i>(RBKC)</i></p>	<p>Some very limited number of small scale A4-5 units may be acceptable on the Pimlico Road frontage subject to policy, servicing etc.. Shops and services are not considered appropriate on Chelsea Bridge Road. Para. 5.26 limits the possibility of a small supermarket to the north end of Ebury Bridge Road frontage only. Amend paras. 5.26 and 5.29 to make this clearer.</p>
<p><u>Paragraph 5.26-5.27</u> Paragraph 5.2 states that it is the City Council's aim outside CAZ to encourage a full range of accessible local services including shopping facilities. Paragraph 5.26 – 5.27 does not, however, allow enough flexibility to provide an adequate range of shopping facilities. . There is evidence of considerable demand in the Pimlico Road area, which comprises predominantly small units, for retail units of 200-300m2.</p> <p>Paragraph 5.27 states that the site is not considered suitable for a superstore or other major retail development. Whilst it is acknowledged that national policy may not support large scale retail development on this site, the brief should not rule out the possibility of including a small to medium sized convenience store of perhaps 900-1000m2 designed to meet the day to day needs of the existing immediate population, together with those to be accommodated within the scheme itself. This type of facility has proven successful on highly accessible sites in other parts of the Borough. The scale of any convenience goods provision on site would clearly need to be justified through the submission of a retail impact assessment, which the brief should acknowledge.</p> <p><i>(Grosvenor)</i></p>	<p>Local shopping centres such as Pimlico Road or Ebury Bridge Road cannot provide for the full range of shoppers needs; a fuller retail offer must normally be sort in the District or Major Centres. Kings Road (east) (Major Centre) is only minutes walk from the site. Brief requests additional retail units on the Pimlico Road frontage of the site.</p> <p>Subject to a satisfactory retail impact assessment and servicing/traffic impact study a small supermarket of this size range without customer parking may be acceptable. The most likely location being the northern end of Ebury Bridge Road.</p>

	<p>If local shopping facilities are to be increased, consideration should be given to meeting the needs of the local community i.e. south Westminster still lacks a large, affordable supermarket that is suitable for families on a low income.</p> <p>It is also worth noting that over the next twelve months A Moveable Feast (South Westminster's Healthy Living Centre) will be undertaking a local food access and affordability study. The findings could be used to inform the types of shop units and local shopping facilities that should be encouraged on this site (and others within the renewal area). Anecdotal evidence already suggests that some residents find it difficult to secure affordable food supplies locally. If there is enough demand, A Moveable Feast will be supporting members of the community to establish a social enterprise food project. If this goes ahead, the Partnership would welcome affordable rent on a shop unit to support this project.</p> <p><i>(South Westminster Renewal Programme)</i></p>	<p>The demand from local residents for an affordable supermarket in the area has been noted. A large supermarket in this location is contrary to policy, as is any supermarket with customer parking. However, subject to a satisfactory retail impact assessment and servicing/traffic impact study a small supermarket may be acceptable. The most likely location being the northern end of Ebury Bridge Road.</p> <p>Noted.</p>
	<p>Residents would also prefer some staple shops to be included in any development. <i>(Cllr Tony Devenish)</i></p> <p>The development should include local shops - an outlet selling reasonably priced groceries will be particularly important. <i>(Cllr Frances Blois)</i></p>	<p>It is not possible for planning to dictate the occupier only the use ie a retail shop. Also see response to South Westminster Renewal Programme directly above.</p>
	<p>More local shops/convenience shops.</p> <p><i>(Pimlico & Knightsbridge Labour Party)</i></p>	<p>The demand from local residents for an affordable supermarket in the area has been noted.</p>
	<p>Perhaps new shops are superfluous given the large amount of shops that are not performing well.</p> <p><i>(Local resident)</i></p>	<p>Noted.</p>
<p>DESIGN AND SITE LAYOUT</p>	<p>General support for the approach <i>(English Heritage)</i></p>	<p>Support welcomed</p>
	<p>Would the chapel be preserved?</p> <p><i>(Pimlico & Knightsbridge Labour Party)</i></p>	<p>Yes, amend brief to promote the retention of the chapel.</p>

<p>I note the brief's negativity towards tall buildings on the site (both proposed and existing) and find this both unhelpful for prospective development proposals and not in general conformity with the provisions of the London Plan and therefore harm its (the London Plan) implementation as regards tall buildings. The crucial issue here has to be that the highest quality of design is required for this important and significant sub-regional site. The existing tall buildings are an integral part of the existing townscape and the views and vistas into and outwith the adjoining conservation areas and the setting of nearby and adjoining listed buildings. A more sophisticated and dynamic design approach is encouraged and required for the successful redevelopment of the brief site to ensure that optimum levels of development can be achieved to meet both strategic and local planning objectives as set out in the development plan. <i>(on behalf of the Mayor of London)</i></p> <p>In relation to site layout TfL supports the desire for new and improved cycle and pedestrian links throughout the site, this will enable the site to integrate into the wider area and provide improved access to local amenities and public transport infrastructure. <i>(on behalf of the Mayor of London)</i></p>	<p>Do not agree.</p> <p>The tall buildings are not an integral part of existing landscape, rather they are an unsightly 'add-on' that have a negative impact on the neighbouring conservation areas, open space, trees, local townscape, environment and amenity.</p> <p>The brief's stance on tall buildings on this site reflects the City Council's policy on high buildings DES 3, and in particular DES 3 (A) (3). The RUDP is in general conformity with the London Plan, and the contents of the brief are consistent with RUDP policy. It is not accepted that changes to the brief are required to ensure general conformity with the London Plan.</p> <p>Support welcomed</p>
<p>We welcome the recognition at paragraph 5.15 that development proposals that satisfy environmental amenity standards can achieve the highest densities within the London Plan. We suggest that the Brief identifies that there is the opportunity for planning application proposals of high quality design which have been subject to appropriate environmental impact assessment to exceed the 1,100 hrh density set out within the London Plan as the site is within an urban location with good accessibility.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>As pointed out in para. 5.15 development proposals for this site will be assessed primarily having regard to the proposed mix, bulk, layout and compliance with other relevant standards and policies set out in the UDP, including in particular the provision of public and private amenity space, design and conservation policies and sunlight/daylight controls; rather than on density based on h.r.h..</p>

	<p><u>7.2. 11 and 13 Background/ Demolition</u> The Royal Borough welcomes the proposed demolition of the existing structures and their replacement with buildings that respond in height to the local townscape. The demolition of the two tower blocks is especially supported, being particularly obtrusive and overbearing. The brief should refer to Pimlico Road and its adjacent streets as being the primary scale. The near-by Gatliff Road redevelopment should not set the predominant scale for the Barracks site.</p> <p>Whilst the chapel may not be worthy of listing and is outside the conservation area, it may nonetheless be worthy of seeking its retention and refurbishment for its visual interest and contribution to Ranelagh Grove, as well as for its social and community use. <i>(RBKC)</i></p> <p><u>7.14 Scale/ Layout</u> Reference should be made in point (iii) to protecting local views from within the Royal Hospital conservation area. Consideration should be given to the opportunity of re-instating an historic view from the Royal Hospital through Ranelagh Gardens and across to the Barracks. Reference or cross-reference to para 7.25 is required, referring to the importance of human scale.</p> <p>Particular reference should be made to the barracks being an inappropriate site for any new or replacement high buildings. The site does not represent an area of regeneration; is not part of a major transportation hub; and cannot be characterised as a cluster of high buildings. Moreover, the Royal Borough considers the site as highly sensitive, adversely affecting the setting of the Grade I and II* Royal Hospital Complex, the Royal Hospital Conservation area and historic Ranelagh Gardens. The unsuitability of the site for tall buildings is confirmed by emerging guidance on high buildings commissioned by the Royal Borough. <i>(RBKC)</i></p>	<p>Support for demolition of existing structures and replacement with buildings of a height and scale akin to that of the local townscape welcomed. Reiterate in brief that the primary scale of the new buildings will be the buildings at Pimlico Road.</p> <p>Agree, amend brief</p> <p>Support for demolition of existing structures and replacement with buildings of a height and scale akin to that of the local townscape welcomed. Reinstatement of view from Royal Hospital through to Ranelagh Grove already in brief. Amend brief to cross reference para. 7.14 to design guidelines in para. 7.25.</p> <p>Reiterate in brief, with reference to RBKC guidance on high buildings and the EDAW 2000 study.</p>
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	<p><u>Para. 7.16</u> It is important that the development preserves the setting of Ranelagh Gardens, given its 'listed' status. Any new development fronting Chelsea Bridge Road should be set well back behind the site boundary in order preserve the vista along the road and maintain the open character and appearance of this part of Chelsea. New buildings should not extend above the existing tree canopy. The development should also be divided into a series of buildings rather than a single building fronting onto the road (cross reference to para 7.16iii) <u>and</u> be broken by an area of public open space. The latter would offer visual amenity, as well as visual and physical penetration into the site. <i>(RBKC)</i></p> <p><u>Para. 7.19/22</u> There seems to be some discrepancy. The detailed guidance on scale in para 7.15-7.20 is followed by a section of "general" advice on scale (para 7.21) that begins with the contradiction that the preceding paragraphs were general principles. The building height limitations refer to office floor to ceiling heights of 3.5m. This is misleading and should be deleted as the built context and planning requirements are for residential buildings (typically 2.1-2.5m per floor) and not offices. The requirement for 3 (possibly) 4 storeys at 3.5m buildings in the north/north-east would translate into 5 to 6 storeys at the domestic scale and exceed the local building heights.</p>	<p>Agreed. Reinforce in text.</p>
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<p><u>Para. 7.29</u> The brief should insist on the development of a formal network of streets and spaces that reconnects the historic street pattern and/ or complements the formal layouts of the surrounding Belgravia and Chelsea estates. This would include perimeter blocks that address the street and not single, large buildings with few entrances or an introverted development.</p> <p>The Royal Borough supports the mixed use by vehicles and pedestrians of all access points and routes through site, which allows for a greater distribution of traffic on the local road network, maintains street activity and assists pedestrian security.</p> <p><u>Para. 7.36 Crime and Security</u> Reference should be made to the advantages of active frontages and passive surveillance.</p> <p><u>Para. 4.7</u> Reference should be made to Ranelagh Gardens being included in the Register of Parks and Gardens of Special Historic Interest in England (as compiled by English Heritage), and to the grade 1 and 2* Royal Hospital complex and the Royal Hospital Conservation area, which includes Chelsea Bridge Road (west). <i>(Royal Borough of Kensington & Chelsea)</i></p>	<p>Agree with the importance of providing streets breaking up the Chelsea Bridge Road frontage. Amend the brief in para 7.16 (iii) with reference to three or four streets / pedestrian links of generous width along the Chelsea Bridge Road frontage to break up any monotonous continuous building line.</p> <p>Agree. Add to brief.</p> <p>Include in brief para. 4.12 and 7.6. Also refer to RBKC documents such as Conservation Area Proposal Statements.</p>
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	<p>The blatant statement (4.4) that “the buildings date from 1960s’ and are considered of little merit” is of very great concern, as is the total condemnation in paragraph (7.13). The architects Tripe and Wakeham designed and built Chelsea Barracks over the period 1960 to 1966, paying respect to the Chelsea Hospital by using similar materials and by the disposition of the different constituents. The layout is bold and imaginative, and the formal frontage of the parade ground onto Chelsea Bridge Road, affording public gaze, is similar to Wellington Barracks on Birdcage Walk. The long five storey residential block, providing over 1000 bed spaces provides not only the background to the Parade Ground but also a separation from the chapel and various service buildings - from Pimlico Road to Ebury Bridge Road. Beyond are the two 15 storey towers of flats . The document states that“ the buildings will be expected to be replaced with buildings of a higher architectural quality, reflecting the site’s surroundings and townscape”(7.13). There is no argued justification for such a conclusion which should have been properly assessed before arriving at such a statement especially if interpreted as proposing wholesale demolition because the buildings were built in the 1960s and therefore have no architectural value. This is not the case. The layout respects the surroundings by use of materials and colour, by the disposition of the individual buildings, and by their respective heights. <i>(Local resident)</i></p> <p>Of their period, the two tower blocks present an extremely fine and well articulated elevation. Built at a similar time as Churchill Gardens they are of equal quality and standing to the listed buildings of Gilbert and Sullivan Houses. From an architectural point of view, these are buildings not to be lightly disposed of. <i>(Local resident)</i></p>	<p>Officers can provide a full justification, in summary:</p> <ul style="list-style-type: none"> (i) The buildings’ monotonous bulk and appearance appears ill-fitting within their context. (ii) From what was a complete early-Victorian barrack building and the first by an outside architect, the 1950’s scheme applied, regardless of the site’s context, a straight forward series of 2 towers and low rise barrack accomodation without any significant degree of architectural design quality or formal set up with the exception of a ‘set back’ to allow for a parade ground. (iii) Neither the architecture or architect are of any distinction either as examples in their own right or providing a contribution to the surrounding townscapes. (iv) The built form compares badly to the architecture of that period that is now designated as Conservation Area in theCity e.g. Hallfield/Churchill/Lillington etc.
	<p>The pedestrian access route from Ranelagh Grove through the site should be reinstated. <i>(South Area Forum)</i></p>	<p>Support for the reinstatement of this route as set out in draft brief is welcomed.</p>

<p>We trust that the conceptual submissions will reflect the openness of the 'long cherished' Barrack Square flanking Chelsea Bridge Road.</p> <p><i>(Thorney Island Society)</i></p>	<p>Partly agree. Amend brief to request a formal open space on the site of the parade ground (though not mirroring its existing area). A formal square at this location would have many benefits in urban design terms, historically denoting the location of the parade ground, creating a pedestrian link and generous vista and views from Ranelagh Grove to Ranelagh Gardens as well as breaking up the frontage on Chelsea Bridge Road.</p>
<p><u>Section 7.16</u> Ranelagh Grove alignment? Ranelagh Grove lies at right angle to the proposed development with houses on one side only in the section which may directly connect with the site. Is it suggested that buildings, continuing in the line of houses, and roadway, continuing the line of that section of Ranelagh Grove, be constructed? Why? If the entry to this site from Ranelagh Grove is to be used only in emergencies, there would seem no reason for this.</p> <p><i>(Local Resident)</i></p>	<p>The provision of a generous and clear link with Ranelagh Grove (ideally of very generous width with mature tree planting) which presently finishes abruptly and uncomfortably is considered to have considerable townscape benefits in terms of a permeable urban street network and opening up important views of Ranelagh Gardens. The fact that Ranelagh Grove historically ended abruptly was due to the presence of the military barracks on the site, which will no longer be the case. Not continuing the alignment of Ranelagh Grove to Chelsea Bridge Road makes no urban design sense and would result in an "island" re-development turning it's back and isolated from its surrounding townscape context.</p>
<p>As a resident of Gatliff Close, it concerns me greatly that I will lose daylight and sunlight. This is despite good intentions, as mentioned on P30 (14.vi) and P32 (7.23) of the Planning Brief (Version 3). Continual references and considerations seem to be made regarding the north side, but I am left unsure as to what might happen to the south side's sunlight and daylight. As things are, I enjoy a lot of both, except of course when the present Waterside Gardens' building site lorries park long outside my window. However that will shortly stop. May great attention please be paid to the daylight/sunlight issue?</p> <p><i>(Local resident)</i></p>	<p>Policy ENV 13(E) (F) and (G) protects the amenity of neighbouring homes. A full daylight/sunlight assessment will be required in accordance with BRE guidance.</p>

<p>We recognise and support paragraph 7.21 which encourages imaginative and outstanding design proposals that pushes the indicative height, bulk and massing guidelines set out at paragraphs 7.14 to 7.20. We suggest that this statement could be expanded to identify the parts of the site that the Council believe may be appropriate for taller buildings of high design quality. This would help to demonstrate the City's support for proposals that seek to maximise the residential development opportunity at the site subject to townscape, environmental and infrastructure considerations.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>The brief outlines general guidelines on building heights, a proposal for buildings above these guidelines would need to be supported by a strong justification in urban design and townscape terms especially in terms of medium and long view studies, in particular from the grounds of the Royal Hospital and surrounding townscapes. It will be during the planning and design stages of the site development that careful consideration, will be given to site layout, townscape, scale, height, bulk and massing. No change.</p>
<p>Paragraph 5.15 states that the site lies in an area with a zoned density range of 250-500 habitable rooms per hectare and that a density at the upper end of this density range is likely to be acceptable. It is considered that the requirement to provide the suggested range is inappropriate for this site and a design led approach should be taken in order to ensure that the optimum use is made of scarce urban land. The contribution which the site can make should be maximised. Density is no more than an output of a proper designated approach. Density calculations are not a sensitive or suitable development standard of control.</p> <p><i>(Grosvenor)</i></p>	<p>Agreed. As pointed out in para. 5.15 development proposals for this site will be assessed primarily having regard to the proposed mix, bulk, layout and compliance with other relevant standards and policies set out in the UDP, including in particular the provision of public and private amenity space, design and conservation policies and sunlight/daylight controls; rather than on density based on h.r.h..</p>
<p>Having had discussions with other residents in Bloomfield Terrace our principal concerns regarding the development is the lack of any conservation order on this vast piece of land that may lead to massive skyscrapers without any height limit overbearing our houses. on the south side of the street all the houses border with the barrack walls and we are most concerned that we will have either a large road behind it as a continuation of Ranelagh Grove or buildings of similar height to the current barrack block blocking our light and causing overlooking neighbours which we do not have currently.</p> <p><i>(Local resident)</i></p>	<p>Brief will protect existing sunlight/daylight of neighbouring uses, it does not suggest a large road as a continuation of Ranelagh Grove, and para. 7.14 (i) (ii) states that development must reflect and relate to the existing townscape context including the 2 and 3 storey houses in the Belgravia Conservation Area.</p>

<p>The marvellous perimeter railings should be listed and retained. The open ground fronting onto Pimlico rd, Chelsea Bridge Road and Ebury Bridge Rd should be kept.</p> <p>List and conserve the Regimental chapel as a fitting memorial to soldiers.</p> <p>Any development should be set back from the road as at present.</p> <p><i>(Local Business)</i></p>	<p>Agree, railings make a valuable contribution to the townscape and should be retained. Agree that some formal open space should replace some part of the parade ground.</p> <p>The chapel is unlikely to be worthy of listing, though an application could be made to English Heritage. Reinforce protection of chapel in brief.</p> <p>Noted. Some formal open space should replace some part of the parade ground.</p>
<p>What is the definition of 'emergency use' in to the cul-de-sac end of Ranelagh Grove, as stated in para. 7.32? Anything other than emergency services would contravene the term. <i>(Local resident)</i></p>	<p>The intention was that access at this point would only be for ambulance, fire service, and police use.</p>
<p>Can a Preservation Order be placed on the railings along Pimlico Road and Chelsea Bridge Road and on the chapel which is a memorial to soldiers?</p> <p>Can the grass frontage be retained?</p> <p>PLEASE NO MORE HIDEOUS GLASS BUILDINGS Could the architect Quinlan Terry oversee the work, rather than more monstrosities produced by Richard Rogers and Norman Foster?</p> <p><i>(Local resident)</i></p>	<p>"Preservation Orders" relate to trees, though the Council does have powers to put a Building Preservation Notice (BPN) on a building or structure which temporarily lists it to give English Heritage time to consider listing. However, it is considered that the best way forward in this circumstance is to amend brief to protect chapel, (railings already protected in brief). At the same time the Council can establish the listability of the chapel and railings through discussions with English Heritage rather than using a BPN.</p> <p>Layout of site to be discussed at later stage, but some formal open space should replace some part of the parade ground. Include in brief.</p> <p>The brief specifically notes in para 7.25 (d), page 33 that predominantly glazed facades are not considered appropriate and that they should have a robust masonry quality</p> <p>It is the developer's decision which architect to commission.</p>

<p>The residents of St Barnabus St would like the protection of the present Barrack wall to be maintained. Can you confirm that this will be so?</p> <p>Also that the wire fencing on the top of the wall should be kept in place, or if it is removed then the wall should be topped by vertical coving to prevent anyone walking on the wall (or throwing missiles as has previously occurred).</p> <p>It is hoped that a high standard of building will be erected in keeping with the surrounding area.</p> <p>Will the Army Chapel be saved? <i>(Local resident)</i></p>	<p>No, but the boundary must be kept, and it is noted that there is little townscape / urban design grounds to justify their removal or lowering.</p> <p>Such details need to be discussed at a later stage.</p> <p>Yes, brief aims to achieve this.</p> <p>Yes, amend brief.</p>
<p>We should not underestimate the challenge such a major development will potentially have to the Conservation areas within the adjacent areas of K & B.</p> <p><i>(Cllr Tony Devenish)</i> <i>(endorsed by Cllr Frances Blois)</i></p>	<p>Agree</p>
<p>The perimeter railings should be listed and retained.</p> <p>The open ground flanking Pimlico road, Chelsea Bridge Road and Ebury Bridge Rd should be retained. Developments should be set back from the road as at present.</p> <p>List and conserve the regimental chapel.</p> <p><i>(Local resident)</i></p>	<p>Railings already protected in brief. Could discuss with English Heritage the feasibility of listing.</p> <p>Layout of site to be discussed at later stage.</p> <p>Brief to be amended to protect chapel.</p>

<p>The brief should emphasis that the redevelopment scheme should be designed to optimise the best use of scarce land.</p> <p>Paragraph 7.13 refers to full scale replacement. A more sustainable option may be to retain some existing buildings.</p> <p><i>(Grosvenor)</i></p>	<p>Agreed, para. 3.2 states that any scheme should ‘maximise the amount of residential accommodation..’ – reinforce in para. 3.1</p> <p>No, do not agree that this is desirable.</p>
<p>Do not allow cramming of buildings.</p> <p><i>(Local resident)</i></p>	<p>Noted</p>
<p>The sensitivity of the site is acknowledged as is the varying change in scale around it. Nevertheless, it is not considered that prescribing building heights is appropriate and that a design led solution should be used to assess a mass and bulk across the site as well as the most appropriate location for public, private and semi private public realm.</p> <p><i>(Ballymore Properties Ltd)</i></p>	<p>Disagree. Prescribing building heights is entirely appropriate in a planning brief, particularly given the adjoining areas’ conservation area status.</p>
<p>May I draw your attention to an apparent factual error on page 34 of the document: paragraph 7.32 refers to the possibility of a new pedestrian route formed by "a link from Pimlico Road (opposite Passmore Street) south-eastwards through the site".</p> <p>In fact, you will see from the plan within the document that the site has no frontage to Pimlico Road opposite Passmore Street, there being intervening buildings. It appears that the reference should be to Holbein Place.</p> <p><i>(Local resident)</i></p>	<p>Agree. Amend para. 7.32</p>

1. The use of streets as a design tool

Lying immediately to the north of the barracks is Belgravia. As the brief notes, 'the larger part of this conservation area comprises a formal grid of streets'. (7.4) The scale is predominantly domestic.

Lying to the south of the barracks are the Royal Hospital and Ranelagh Gardens which are formal. The scale is monumental.

The brief also notes, indeed stresses repeatedly, that 'It will be essential that new development responds to this historic townscape context.' (1.3, 3.2, 7.2 & 7.10)

Yet the brief leaves unclear how this 'response' should be delivered. Should it take the form of streets with a domestic scale, as in Belgravia, or should it be a formal design of monumental buildings as in the Royal Hospital? The Chelsea Society believes that the planning brief should require a layout based on streets lined by houses and flats. Our concern is that if the City Council does not specify such an approach to design developers will offer blocks separated by amorphous spaces. Gatliffe Road Grosvenor Waterside, just across Ebury Bridge Road, is a dreadful warning.

The Chelsea Society urges the City Council to state clearly in the brief that streets fronted by houses, flats and other buildings should be used as an organising framework throughout the new development and connected to the streets adjoining the site.

(The Chelsea Society)

Accepted. **Amend brief to make reference to the need for the site's development to be fully integrated in to the surrounding townscape. For clarity's sake the brief could state that there is an expectation that the more modest scale of development on the eastern side of the site should respect the denser grain of residential streets with identifiable terraces with a compact rhythm of individual house facades defining the road frontages whilst along Chelsea Bridge Road and Ebury Bridge Road larger more imposing blocks of buildings (but not a continuous building line) again defining a road frontage are more appropriate to reflect the larger scale context of these primary streets.**

2. Ranelagh Grove

The brief notes that 'Ranelagh Grove provides a vista through this area creating a visual link between larger buildings fronting main roads to the east and the barracks. (7.5)

Examination of the map of the site makes clear that the Ranelagh Grove vista lines up with the great baroque axis that runs along the south east side of Sir Christopher Wren's Royal Hospital. This is an historic vista and one vestigially maintained by a gap under the main building of the 1960s barracks.

The Chelsea Society urges the City Council to require that the line of Ranelagh Grove be carried across the site in the form of a street connecting to Chelsea Bridge Road thus re-establishing a historic vista *and integrating the new houses on the barracks site with Belgravia and the Royal Hospital.*

3. Chelsea Bridge Road

The brief notes that the 'height of buildings along the Chelsea Bridge Road frontage should be comparable to the buildings they will face across Pimlico Road to the north west.... (7.15). This is an invitation to a developer to build a massive wall of apartments on the south side of the site that would, particularly in winter, shadow much of the rest of the barracks site to the north of it.

Breaking this long frontage at several points by means of side streets would be one way to let winter sunlight penetrate across the site. Changing the statement that 'the upper end of the range (of 250 to 500 habitable rooms per hectare) is likely to be acceptable' could be another. A reduction in both height and density are desirable if 'domestic scale' and domestic feeling are to be achieved.

The Chelsea Society urges the Council to ensure that any terrace along Chelsea Bridge Road is not more than five floors high and pierced by at least three side streets - including Ranelagh Grove.

(The Chelsea Society)

Agree. **The importance of the Ranelagh Grove axis could further be elaborated on in the brief.**

Agree with the importance of providing streets breaking up the Chelsea Bridge Road frontage. **Amend the brief in para 7.16 (iii) with reference to three or four streets / pedestrian links of generous width along the Chelsea Bridge Road frontage to break up any monotonous continuous building line.**

<p>4. The Chapel The military chapel designed by George Morgan in 1855 is the only remaining part of the original home of the Queen's Guard. It may not, as the brief says, merit listing but that does not mean it should not be retained. The Society urges the Council to require that the chapel be retained and found a new role either as a local church or as a communal hall.</p> <p><i>(The Chelsea Society)</i></p>	<p>Agree. Amend brief to retain chapel.</p>
<p>Buildings should not exceed 6 or 7 storeys in height. They should be designed to the highest architectural standards in keeping with the surrounding conservation area both within Westminster and beyond in order to complement rather than overwhelm surrounding properties along both Pimlico Road and Ebury Bridge Road (and not to overshadow the Royal Hospital site on the opposite side of Chelsea Bridge Road).</p> <p>Pedestrian access to the development should offer as many options as possible, including directly onto the Pimlico Board/Lower Sloane Street junction in addition to access to Ranelagh Grove, Ebury Bridge Road and Chelsea Bridge Road.</p> <p>The unlisted Chapel within the site. The brief is less than forthcoming about its future and it would be preferable to have a more definitive statement in any adopted Planning Brief as to how the City Council sees its future.</p> <p><i>(Westminster Society)</i></p>	<p>Generally agree, though overall building height is more important than number of storeys, and some buildings fronting Ebury Bridge Road are up to 9 storeys high.</p> <p>Agree, this supports position in the draft brief but the Transport Impact Assessment will need to be taken into account.</p> <p>This consultation has revealed widespread support for the retention of the chapel. Amend brief to seek retention of chapel.</p>
<p>Welcome the redevelopment of the site. However, may I request that the railings that front the property on the various roads are kept and not pulled down, as they are so splendid and will be an asset to the development and provide security for the people who live in it.</p> <p><i>(Local resident)</i></p>	<p>Yes, the brief requires the railings to be retained.</p>

<p>TRAFFIC</p>	<p>Need to look very widely at the potential traffic impacts: a large east west study and take into account how the development of Battersea Power Station will affect traffic in the area. <i>(South Area Forum)</i></p> <p>What has happened to the plan to straighten Pimlico Road – has it been shelved? This will have an impact on local traffic. <i>(South Area Forum)</i></p> <p>Holbein Place is already a rat run. <i>(South Area Forum)</i></p> <p>Ebury Bridge Road junction with Chelsea Bridge Road already has traffic conflicts/jams. It is also very difficult to cross. <i>(South Area Forum)</i></p> <p>Traffic lights at junction of Pimlico Road and Chelsea Bridge Road are very dangerous – crossing the road is almost impossible as you can't see the traffic lights. <i>(South Area Forum)</i></p> <p>Will it increase traffic on the quieter roads such as Ebury Bridge Road? <i>(South Area Forum)</i></p> <p>Royal Hospital Road is already a pinch point since the Pimlico Coach ban. <i>(South Area Forum)</i></p> <p>Bus routes are very good (except to the Lister Hospital). <i>(South Area Forum)</i></p>	<p>Include impact of Battersea Power Station development in the Transport Impact Assessment.</p> <p>There is no plan to straighten Pimlico Road and never has been as far as officers are aware.</p> <p>The main reason why Holbein Place is a rat-run is considered to be that traffic is not allowed to turn right from Lower Sloane Street into Royal Hospital Road, so it uses Holbein Place, Pimlico Road, Royal Hospital Road instead. The redevelopment of the barracks should not add to this movement. Furthermore, RBKC's proposals for Sloane Square involve closing Holbein Place at its junction with Sloane Square, which will reduce rat-running. Also, RBKC is responsible for the Lower Sloane Street / Pimlico Road / Chelsea Bridge Road / Royal Hospital Road junction and has been asked, as part of the Sloane Square work, to review whether the right turn from Lower Sloane Street into Royal Hospital Road can be permitted.</p> <p>Noted. The City Council will review this junction in association with RBKC, which is responsible for it, once proposals are received and the City Council has an idea of how much traffic the proposals are likely to generate.</p> <p>Noted. The City Council will review this junction in association with RBKC, which is responsible for it, once proposals are received and the City Council has an idea of how much traffic the proposals are likely to generate.</p> <p>It is considered highly likely that, however the site is redeveloped, it will generate more traffic than does the existing use. So yes, it is likely that surrounding streets, including Ebury Bridge Road, would experience an increase in traffic levels.</p> <p>Comment noted, but do not understand why the coach ban, e.g. on Ebury Street, should cause a bottleneck on Royal Hospital Road.</p> <p>Noted</p>
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<p>Para.10.1/5 Traffic Management The brief states that the residential development will significantly increase the traffic generated and that Westminster wishes to ensure that this remains within the capacity of the road network. The Royal Borough endorses this. However, at present both the junctions of Chelsea Bridge Road with Royal Hospital Road and the Embankment are running close to capacity during peak periods. It will therefore be essential for the developer to undertake extensive modelling to show the wider traffic impacts. This should take into account the westward extension of the Congestion Charge Zone and proposed changes at Sloane Square. <i>(RBKC)</i></p>	<p>Noted and agreed</p>
<p>The development does provide the opportunity for setback to allow for the widening of Chelsea Bridge Road, if required. The Royal Borough will need to assess if there is any scope for improving the operation of the Chelsea Bridge Road/ Royal Hospital Road junction. <i>(RBKC)</i></p>	<p>Noted and agreed</p>
<p>A primary school on the Barrack site would have significant impacts upon traffic and access in the Sloane Square area and would be of concern to the Royal Borough. If a school is to be provided, the brief should set out the principles of and requirement for a school travel plan and promote walking to school. <i>(RBKC)</i></p>	<p>Noted and agreed</p>
<p>Para. 10.15 Servicing Some D1 uses have the potential to generate a significant amount of traffic during the periods of drop off and collection of pupils. The impact of such uses would have to be very carefully considered and accommodated off-street as far as possible. Similarly servicing of the potential A1 units should be accommodated off-street. . <i>(RBKC)</i></p>	<p>Noted and agreed</p>

<p>Traffic through Ranelagh Grove, St. Barnabas Street and Bloomfield Terrace has become much worse since the traffic changes on Buckingham Palace Road. More cars than ever flood through Pimlico Road and 'rat-run' through our streets. In addition we find it harder to find available parking places near to our houses. It is difficult to understand why; perhaps because this area is being used more by residents from the new apartments on Ebury Bridge Road. More often than not there is nowhere available to park and we must find a place further away. Inevitably, with the redevelopment, there will be even more traffic pressure on this small area, although you state that the Ranelagh Grove entrance would be used in 'emergencies only'. Unfortunately, this is not a guarantee and I can well imagine the redeveloper deciding to open the street to traffic. Such a decision would RUIN the quality of life on Ranelagh Grove, St. Barnabas Street and Bloomfield Terrace. As it is we are concerned with the suggestion of opening it to bicycles and pedestrians, especially as the development would bring an additional 2500 people to the area. This small area has been remarkably free of crime; such a massive change would bring much more disturbance and we would be at greater risk. We are particularly concerned about groups of young people 'hanging out' or using the quieter lower part of Ranelagh Grove (near the Barracks) to do aerobatics on cycles. This has happened in the past and it is dangerous and disturbing. <i>(Local resident)</i></p>	<p>Noted. Do not dispute that rat-running has increased in these streets. Have no figures on which to comment. But cannot see why the works in Buckingham Palace Road a few years ago should have caused such an increase.</p> <p>The City Council will seek to ensure that the redevelopment of this site does not increase parking pressures on existing streets.</p> <p>Any decision on whether to open up Ranelagh Grove, including to pedestrians and/or cycles only, would be one for the City Council, not a potential developer.</p>
<p><u>Proposed Access to Ranelagh Grove</u> The corner of Ranelagh Grove, St Barnabas St and Bloomfield Terr. is already often congested. No traffic should be allowed into this area as the streets are narrow and will become totally impractical for access and parking. There are 2 schools close to the gates into Ranelagh Grove which means that streets are congested at school times and also that any increased traffic presents a very real danger to the children. The site should therefore have no public access or contractors' access into Ranelagh Grove. <i>(Local resident x 2)</i></p>	<p>Noted. Any decision on whether to open up Ranelagh Grove, including to pedestrians and/or cycle only, would be one for the City Council, not a potential developer.</p>

<p>The Barracks end of Ranelagh Grove has minimum traffic. I welcome the restrictive clauses in the Brief concerning the uses of this access of the site. However, I am concerned by the lack of definition. See comments below.</p> <p><u>Access to the site</u></p> <p>7.16(iv) I question what is meant by 'alignment with Ranelagh Grove' would be appropriate'. I comment below on the question of access to the site from Ranelagh Grove.</p> <p>7.30 & 7.32 At present access to the site from Ranelagh Grove is only for use in emergency. To allow even pedestrian and bicycle access to and from the site into Ranelagh Grove would have a detrimental effect on Ranelagh Grove and the neighbouring side streets. Access to public transport and nearby shops from the site could be obtained by direct access onto Ebury Bridge Road in the south east or Chelsea Bridge Road in the west. What is stated in paragraph 7.32 is inconsistent with paragraph 10.4, and there is no definition of 'emergency use'. I would prefer 'emergency services only'.</p> <p>The confluence of Ranelagh Grove, St Barnabus Street and Bloomfield Terrace is often congested and any access to the site from these streets will aggravate this situation, particularly at the junction. Schools for young children are one problem, another is residential parking, which limits traffic to one lane in these roads, and yet another is access to restaurants in the area.</p> <p>12.2 To permit any access to the site for contractors' vehicles in connection with demolition and construction through Ranelagh Grove will cause severe congestion and vibration to the properties abutting neighbouring roads many of which have old listed buildings. They will also present a safety problem. 'Essential Exceptions' is not defined, but no egress or access to the site should be permitted for contractors' vehicles.</p> <p><i>(Local resident)</i></p>	<p>This refers to re-establishing a vista through the site from Chelsea Bridge Road to align with Ranelagh Grove. This vista could then double as a pedestrian/cycle route.</p> <p>Noted. Any decision on whether to open up Ranelagh Grove, including to emergency vehicles, or to pedestrians and/or cycles only, would be one for the City Council, not a potential developer.</p> <p>Noted</p> <p>Noted</p>
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	<p><u>Section 7.30 and 7.32</u> What is meant by 'access for Ranelagh Grove should be for emergency use only'?</p> <p>I feel strongly that access to the site from Ranelagh Grove should be for emergency service vehicles only, to alleviate some emergency, for the following reasons: The junction created by St Barnabas Street, Bloomfield Terrace and Ranelagh Grove is already extremely busy particularly in the morning and evening with commuter traffic 'rat-running' to avoid traffic lights in Pimlico Road and children going to St Barnabas School and the Thomas School. All of this with no-one having the right of way! We cannot have another regular access to this busy junction: it would at least cause noise pollution and chaos and at worst danger and accidents for children, the increasing number of cyclists, adult pedestrians and vehicles.</p> <p><u>Section 12.2</u> Construction vehicles must not be considered emergency service vehicles and must <u>not</u> be permitted access through Ranelagh Grove for the reasons of disruption and danger given in my note 2 above. <i>(Local resident)</i></p>	<p>The intention was for access by emergency vehicles only. Amend brief to make it clear that this refers to emergency vehicles only.</p> <p>Noted</p> <p>Construction vehicles cannot be considered to be emergency vehicles</p>
<p>PARKING</p>	<p>It is important that the level of car parking is in line with those standards set out in Annex 4 of the London Plan. Due to the Central London location and high PTAL of the site, TfL would like to see a much more restraint based approach to the provision of car parking. For example, this could include 'car free' development in those sections of the site where public transport is most accessible. TfL welcomes the fact that residential 'car club' schemes are encouraged within the document. Adequate levels of cycle parking should be provided throughout the site these should be in line with TfL's London Cycle Design Standards.</p> <p><i>(on behalf of the Mayor of London)</i></p>	<p>The City Council will take the relevant standards into account, which are largely in line with its own, but the City Council does not currently allow car-free housing.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage.</p>

<p>The Council must insist on parking space inside the area. <i>(Local resident)</i></p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage</p>
<p>10.6/13 Parking The Royal Borough would welcome a reduced level of off-street parking as this would lead to a reduction in traffic from the site if on-street parking were properly restricted. To allay the potential concerns of on-street parking generated by this restricted provision the proposal could be accompanied by a S106 limiting availability of on-street parking permits to residents of the site. <i>(RBKC)</i></p>	<p>The City Council has parking standards, which are set out in its UDP. The City Council does not currently allow car-free housing.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage</p>
<p>Overground parking is an eyesore and will take space away from other uses such as open space. <i>(South Area Forum)</i></p> <p>Underground parking is preferred but would affect plans for other services eg a swimming pool. <i>(South Area Forum)</i></p>	<p>Noted. Exact nature and location of parking facilities will need to be discussed at the design stage but it is likely that a combination of underground and surface parking will be necessary.</p>
<p>Parking standards should be applied flexibility and innovative solutions sought to manage travel to and from the site. The brief should not prescribe that parking will be expected to be provided under ground as until a scheme is developed for the site and viability/public realm considered it is premature to demand this. <i>(Ballymore Properties Ltd)</i></p>	<p>Noted. Exact nature and location of parking facilities will need to be discussed at the design stage but it is likely that a combination of underground and surface parking will be necessary.</p>
<p>Adequate parking should be provided so that the cars will not be utilising the surrounding residential streets. <i>(Local resident)</i></p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage</p>
<p>Resident Parking in Westminster is at a maximum. How many more cars will get to fight for the same places in the surrounding streets? <i>(Local resident)</i></p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage</p>

<p>There should be safeguards for car parking for the affordable housing. (<i>Octavia Housing</i>)</p>	<p>Parking policy applies to both market and affordable housing. The numbers for the affordable housing element will need to be agreed with partner RSLs.</p>
<p>That parking issues should be considered very carefully to ensure there is adequate provision on site in terms of parking spaces. (<i>Pimlico & Knightsbridge Labour Party</i>)</p> <p>Car clubs should be considered. (<i>Pimlico & Knightsbridge Labour Party</i>)</p>	<p>Agree</p> <p>The draft brief encourages proposals for on-site car sharing/leasing such as 'car club schemes'.</p>
<p>Given the access to good public transport within relatively easy walking distance, it could be argued that parking provision should be limited.</p> <p>(<i>Westminster Society</i>)</p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage, but it should be assumed, since the City Council does not currently allow car-free housing, that residents of the site will be able to obtain residents' parking permits.</p>
<p>If the Barracks site development is to be considered an integral specific scheme with much underground and over ground parking should the permits be for such parking that is available on the site rather than general Zone A Westminster permits? If all residents were able to apply for and receive permits for General Zone A the surrounding streets <u>all</u> to the NE and East of the site could not possibly accommodate extra thousands of vehicles, and of course, the streets due north and west are in the borough of Chelsea and Kensington.</p> <p>(<i>Local resident</i>)</p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage, but it should be assumed, since the City Council does not currently allow car-free housing, that residents of the site will be able to obtain residents' parking permits</p>
<p>Must be more than adequate parking within the development so that cars will not spill out onto surrounding residential parking spaces.</p> <p>(<i>Local business</i>)</p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage</p>

<p>Very concerned about parking -it is already very difficult to park at Ranelagh Grove.</p> <p><i>(Local resident)</i></p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage</p>
<p>It is not stated whether residents of the site will be granted Westminster residents parking permits for parking in the area. If it is zoned Westminster, then given the intended number of units and not very generous 'parking allocation', this is likely to result in a severe shortage of available car parking spaces for residents in the surrounding area.</p> <p><i>(Local resident)</i></p>	<p>Noted. The City Council has parking standards, which are set out in its UDP. It does not wish the development of this site to lead to increased pressure on existing on-street parking facilities.</p> <p>Exact nature and location of parking facilities will need to be discussed at the design stage, but it should be assumed, since the City Council does not currently allow car-free housing, that residents of the site will be able to obtain residents' parking permits</p>

<p>PLANNING OBLIGATIONS GENERALLY</p>	<p>Fairview require that the use of planning contributions highlighted in Section 6 (page 21) of the document should conform to the guidance issued in ODPM Circular 05/2005. The need for such provision should be applied on a site-by-site basis and planning obligations should adhere to the tests that they should be:</p> <ul style="list-style-type: none"> i) relevant to planning; ii) necessary to make the proposed development acceptable in planning terms; iii) directly related to the proposed development; iv) fairly and reasonably related in scale and kind to the proposed development; and v) reasonable in all other respects. <p>Fairview request that the document recognises the impact that planning obligations can have on the viability of development. As such, the following text should be included in Section 6 of the SPD:</p> <p>“The Council will have regard to the impact of planning contributions on the viability of development and will ensure that they are necessary to allow consent to be given for a particular development and that they are fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects”.</p> <p><i>(on behalf of Fairview Homes)</i></p>	<p>Westminster will take into account the guidance contained in Circular 05/05 and the related five policy tests, when negotiating planning obligations.</p> <p>Westminster has due regard to economic viability issues on individual cases and will consider independent viability advice when required. The obligations sought will comply with the tests outlined in Circular 05/05</p>
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We refer to the general comments of WPOA, of which Grosvenor is a member, concerning planning obligations (copy attached).

The cumulative impact of obligation and the setting of priorities need to be carefully considered at an early stage. Based on recent experience, it is clear that not all of the City Council's aspirations can realistically be achieved on a single site. It would be helpful for the brief to make clear how these priorities will be established.

Paragraph 6.4 has very serious implications. The application of PGS on top of obligations established and justified by reference to financial appraisals undertaken prior to 2008 would clearly be unacceptable to all concerned. The City Council will need to agree a cascade mechanism or revocation of obligations in the event that PGS is introduced.

Paragraph 5.24 The brief includes an exhaustive list of potential social and community uses for the site including primary healthcare, a community centre, arts provision, toy library etc. Whilst Policy H10 (which seeks a community use on some large housing sites in appropriate circumstances) is acknowledged, the brief should make it clear that the provision of a social and community facility on site will need to relate directly to the proposed development and be negotiated through the application process in order to ensure that the facility is compatible and financially viable as part of the scheme proposals. The brief should indicate that such provision would be treated as a planning benefit and taken into account in considering the overall provision of benefits on the site including the level of affordable housing achievable. The ability for a contribution to be made in lieu which is advocated within policy H10 should be stated.

In addition, the brief should be clear that the Barracks site cannot accommodate all of the community facilities with a current identified need within this part of the City.

(Grosvenor)

Although it is acknowledged that it may not be possible for the site to accommodate all the community facilities for which there is a current need, those that have been identified need to be included in the brief. Priorities can then be determined by Members at the time of the application.

The system of PGS/S106/cascade mechanism is yet to be established in light of the paucity of details regarding PGS. Para 6.4 is simply flagging up the issue that PGS may have an impact on S106, and that S106 contributions may be scaled back to cover only site-specific measures.

The 'in kind' land / facilities provided would usually form part of the S106 package. H10 does allow for a contributions rather than the provision of a facility, in certain circumstances.

Although it is acknowledged that it may not be possible for the site to accommodate all the community facilities for which there is a current need, those that have been identified need to be included in the brief. Priorities can then be determined by Members at the time of the application.

<p>The draft Brief sets out a number of aspirations for a range of community uses including a swimming pool, education and health facilities. It will be important for the Brief to clarify that the provision of these facilities will be considered at the preparation of a full planning application when development proposals can be considered 'in the round' taking account of other scheme requirements.</p> <p>We welcome the recognition within the draft Brief that contributions to a pooled fund for the indoor sports facilities may be acceptable but suggest that this mechanism is extended across the range of community facilities and linked to the production of an up-to-date assessment of local need. It will be appropriate for other developments in the area to make payments into this pooled fund and any s106 deal in relation to the Chelsea Barracks site should enable staged payments to be made reflecting the likelihood for phased development.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>Agreed and noted</p> <p>Para 5.21 – pooled funds – have also consulted on Victoria Social and Community Fund (6.17) which allows pooled funds to be used for local community projects</p>
<p>The Partnership is grateful that Westminster City Council has incorporated some of its community priorities (taken from South Westminster Renewal Partnership Portfolio of Projects - June 2005) into account including; a community centre, provision for services like Pimlico Toy Library and facilities for Friday prayer. Affordable childcare provision would also be welcomed.</p> <p><i>(South Westminster Renewal Partnership)</i></p>	<p>Noted. Childcare facilities e.g. play group, after school club etc is probably best integrated into a community centre, include in brief.</p>

	<p>Para. 6.2 The Royal Borough welcomes the provision of local highway improvements, including Chelsea Bridge Road. This could be extended to include Lower Sloane Street and Royal Hospital Road, which are likely to experience significant increases in traffic levels as a result of the development. Similarly, tree planting and other environmental improvements (including public art) in the vicinity are welcome. <i>(RBKC)</i></p> <p>Para. 6.10/11 It is hoped that developer contributions to fund the upgrade or expansion of existing schools or healthcare facilities within reasonable walking distance will include those located near-by within Chelsea. <i>(RBKC)</i></p>	<p>S106 contributions can be spent on a cross borough basis if justified</p> <p>S106 contributions can be spent on a cross borough basis if justified.</p>
<p>PUBLIC TRANSPORT</p>	<p>The site has a public transport accessibility level (PTAL) ranging from 4 to 6, on a scale of 1 to 6 where 6 is most accessible. Reference to the PTAL of the site should be made within the document for example, at the beginning of paragraph 4.14 and/or with a PTAL map of the site on page 12. TfL is happy to provide PTAL maps on request.</p> <p><i>(on behalf of the Mayor of London)</i></p> <p>TfL welcomes the fact that the document recognises the importance of securing highway and public transport improvements through the planning obligations process and that the Victoria Area Transport Studies (VATS) and Victoria Area Traffic and Environmental Management Studies (VATEMS), both led by your Council, have been identified as funds towards which contributions from any future development on this site can be allocated.</p> <p><i>(on behalf of the Mayor of London)</i></p>	<p>Noted. Include reference to PTAL rating in brief.</p> <p>Noted.</p>

<p>Para. 6.5/6 The site may lie within the City's SW1 Victoria Area, but is likely to have a disproportionately large impact upon this part of Chelsea. Victoria Station is over 1km away, whilst Sloane Square is less than half the distance. It is likely that Sloane Square and local buses will see a more significant increase in use as a result of this development than Victoria. Therefore contributions may be more appropriate for improvements to the more local services. Consideration should be given to addressing the upgrade of Sloane Square underground, improving local bus services, and contributing to highway improvements in and around Sloane Square. <i>(RBKC)</i></p> <p>The provision of some form of bus stand/ turning facility on or adjacent to the Barracks site to replace that in Sloane Square should be considered. London Buses is examining a replacement facility for the no.319 that will terminate at Peter Jones, turn right into Lower Sloane Street, stand in Royal Hospital Road before turning around to rejoin Lower Sloane Street. There would be merit in the bus service being extended to the new development, where it would terminate, stand and turn to go back. <i>(RBKC)</i></p>	<p>Subject to detailed transport studies and consideration of potential impacts and mitigation, there will be continuing co-operation with RBKC and TfL as necessary. This might include further joint working or cross-funding.</p>
<p>Bus routes are already very good – except to the Lister Hospital <i>(South Area Forum)</i></p>	<p>Noted</p>
<p>That transport issues should be considered very carefully to ensure that public transport infrastructure is upgraded to cope with the increased demand. <i>(Pimlico & Knightsbridge Labour Party)</i></p>	<p>Full consideration of this issue will be included in the Transport Impact Assessment.</p>

	<p>For a major development of this nature, access is a significant issue. The site is well served by public transport along Chelsea Bridge Road and with ready access to Pimlico Road (with a direct bus route shortly to be introduced along Ebury Bridge Road). Access by public transport to major supermarkets is a significant issue especially in relation to the location of the affordable housing component of the development and this should be given particular attention.</p> <p><i>(Westminster Society)</i></p>	<p>Agree, new residents will need easy access by public transport to the nearest supermarket, if one is not provided on site.</p>
HEALTHCARE	<p>Additional primary health care facilities are probably needed. <i>(South Area Forum)</i></p>	<p>Noted</p>
	<p>A request for a hospital campus on this site <i>(South Area Forum)</i></p>	<p>Noted</p>
	<p>Paragraph 5.23 and 6.11 The PCT request will need to be assessed. It should be borne in mind that the City Council proposes using the Health Urban Development Unit model. This could potentially lead to significantly higher demands for health contributions than are currently expected. The model attempts to identify total healthcare costs per head, including hospital and mental health services as well as GPs and primary care. It also includes estimates of revenue as well as the capital cost. The Section 106 Agreements should be based only on capital costs of primary health care elements. The works of the model are somewhat opaque and these should be made explicit and shared fully with applicants. We are not aware whether the model has been set up to make local assumptions for Westminster. We do not consider therefore that the HUDU model at this stage is appropriate.</p> <p><i>(Grosvenor)</i></p>	<p>Model is Westminster specific. HUDU states that both capital and revenue costs can be sought. HUDU has been developed by the NHS and further details, including the workings of the model can be found on: http://www.healthyrbandevelopment.nhs.uk</p>
	<p>Support a health centre on site as Vincent Sq. facility presents travel problems. <i>(Local resident)</i></p>	<p>Noted</p>

	A health centre would be a good idea since it is a long walk for older people to current facility. <i>(Pimlico & Knightsbridge Labour Party)</i>	Noted
COMMUNITY CENTRE	Given the size of the scheme there should be a requirement for a community hall. <i>(Octavia Housing)</i>	Sounds like a sensible idea as it could then be multi purpose for all members of the community eg parent and toddler, youth club, exercise classes etc. etc.
	Need a community hall, to include provision for worship facilities, in particular for local muslims, and a luncheon club and other facilities for older people. <i>(Pimlico & Knightsbridge Labour Party)</i>	Noted
	We are very pleased that the brief highlights the need for facilities for Friday prayer, within a new purpose designed and built community centre. We have been lobbying for space for prayer for a number of years, and there is significant demand from the local community. South Westminster has a large Muslim community, but there is no Mosque locally, and the nearest is in Regent's Park. It is unlikely that a Mosque will be built more locally in the near future, because there is no reasonably priced land available. We are therefore keen to ensure that any community facility on this important site, incorporates a large hall within a community centre, which can accommodate at least 150 people for Friday prayer. In addition, we would like to secure a separate room, with a separate entrance, that can accommodate between 20 to 30 people for prayer five times daily throughout the week. We are also keen to use the community centre at other times, to provide activities for the Muslim community e.g. activities for children and young people. <i>(The Westminster Bangladeshi Association and the Westminster Muslim Welfare Trust)</i>	There seems to be a strong desire in the local community for a community centre with large meeting space. A multipurpose hall that was capable of serving all sections of the community (sometimes at different times) would be a real asset to the existing and new residents and would be a sustainable use of the space. Regarding the request for a prayer room, the allocation of specific spaces within any community centre would really be a matter for the management of the centre, and would be decided on at a later date.
	At a meeting at the local Labour Party there were requests for a mosque which at this particularly sensitive time did not go down well. The bangladeshi community already have 3 places of worship around Pimlico which would seem ample. <i>(on behalf of Bloomfield Terrace residents)</i>	We have only received request for facility for prayer on Friday which could be used by wider community at other times, plus a prayer room, but not a mosque.

EDUCATION (including early years provision)	<p>Current situation seems to be that there are 4 over-subscribed and 2 or 3 under-subscribed schools in the area. <i>(South Area Forum)</i></p> <p>Request for adult education classes either on new site or in an existing school such as St Barnabas. <i>(South Area Forum)</i></p>	<p>Noted</p> <p>Noted</p>
	<p>That a new school or schools should be provided with good sized playgrounds and sports area. Post Meeting Note: These could be combined with the public open space requirement and facilities that could also serve surrounding schools that are under provided in terms of playgrounds and sports space. <i>(Pimlico & Knightsbridge Labour Party)</i></p> <p>A pre-school nursery is needed <i>(Pimlico & Knightsbridge Labour Party)</i></p>	<p>Latest child yield projections indicate that additional demand for school places can be met within existing schools.</p> <p>Early Years are of the view that there is currently capacity in voluntary sector nurseries in the area. Nursery facility is addressed in para. 5.23</p>
	<p>Affordable nursery provision</p> <p>There is a real need for affordable nursery provision, as there is a real shortage of affordable, community provision in this part of the city. <i>(The Westminster Bangladeshi Association and the Westminster Muslim Welfare Trust)</i></p>	<p>The City Council recognises that the provision of affordable, flexible childcare is vital in enabling people, especially women, to take up paid work. The Council is committed to working with providers in the childcare sector to encourage and promote the development of the childcare market to meet current identified and future demand.</p>

<p>Para. 5.19 In view of the large amount of affordable housing on site, the expectation must be that the new development will result in an increased demand for state education. The nearby St. Barnabus School (WCC CoE) is full. The school with the next easiest access is Holy Trinity (K&C, CoE), which is also full. The Royal Borough has no spare primary capacity in the area. The problem will be intensified by a substantial new development at Chelsea Barracks. The brief should be less abstract about the need for education facilities. It should confirm the requirement for a new facility, indicating the minimum and maximum size in pupil numbers, or an extension to a named facility. For the record, our closest secondary school, St Thomas More, is a heavily over-subscribed RC school.</p> <p>(RBKC)</p>	<p>Noted</p>
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Paragraph 5.22 and 6.10 The Brief is far from clear on the issue of school provision. Collection of appropriate contributions to enhance existing facilities is a preferred first step as opposed to on site provision, given constraints on capital and revenue education expenditure.

Fully considered child yield data is required based on a realistic assessment potential given the nature, scale, mix and location of the site. We draw attention to the comments made by WPOA in the City Council's draft SPG on planning obligations. The child yield formulae in the SPG do not distinguish between flats and houses which could lead to significant over-estimates in schemes with a high number of flats and low affordable housing. This issue should be addressed in the brief given that there are likely to be a significant number of flats within the scheme.

Education is dealt with at Paragraph 5.22 and at 6.10. Paragraph 5.22, which states the Barracks "could provide an opportunity for a new school" appears to be a generalised statement with little policy justification. The site is not safeguarded for educational use, nor is any indication given, either here or within the UDP, as to the likely level of new population at which a requirement for a new school is triggered. This lack of clarity and unsupported statements creates significant uncertainty for potential bidders on the site which should be rectified.

Paragraph 6.10 further states that "if it is feasible to add sufficient places to meet demand by expansion at existing schools within reasonable walking distance, a contribution from developers either through s106 monies or any other valid mechanism, could be earmarked to meet the cost of enhanced education provision. If it is not, however, a school may need to be included on the site." For consistency and clarity, this reference to the potential for a contribution to be payable in lieu of provision should be carried through into paragraph 5.22. (*Grosvenor*)

Most of the developments in Westminster are flatted – the affordable housing allocations criteria is Westminster specific and therefore is mainly related to flats.

Latest child yield projections indicate that additional demand for school places can be met within existing schools.

No, do not agree, Section 5 refers to uses that will, or may, be required on site. Para. 5.22 alerts the reader to the potential need for a new school on the site.

	<p>Education provision must be addressed. A new primary school, or expanded existing primary school will be required. (<i>Cllr Frances Blois</i>)</p>	<p>Latest child yield projections indicate that additional demand for school places can be met within existing schools.</p>
LEISURE	<p>Support for a sports complex (with cheaper access for local residents) (<i>Local resident</i>)</p>	<p>Support noted.</p> <p>There is opportunity for a sports complex at this site and indications (eg very high usage and utilisation at other Westminster leisure facilities such as the Queen Mother Sports Centre) suggest demand for such facilities would be high.</p> <p>There would be an opportunity to align pricing for the facility to the fees and charges model applied by WCC. This ensures appropriate charging for residents and concessions.</p>
	<p>Para. 5.20 add the word 'strongly before considered – we would really like a pool on this site.' (<i>Cllr Alastair Moss – Chairman for Planning and City Development Committee</i>)</p>	<p>Consultation has revealed a demand for a new public swimming pool at this site.</p>
	<p>We would welcome a new swimming pool in south Westminster, particularly one that is designed to accommodate the needs of the Muslim community living locally. The swimming pool at Pimlico School is being used for swimming classes for the Muslim community, and these have proved to be very popular. We would like to ensure that one of these redevelopment sites (Chelsea Barracks or Pimlico School) incorporates a new swimming pool that can adequately meet the diverse needs of the local community. (<i>The Westminster Bangladeshi Association and the Westminster Muslim Welfare Trust</i>)</p>	<p>As noted, there is demand for this facility particularly as an enhanced or new swimming pool facility at Pimlico school is unlikely to happen as part of the 'Building Schools for the Future' programme.</p> <p>We would seek to ensure that a new leisure facility on the site would be designed to ensure diverse community requirements were met along with appropriate activity programming which is relevant to the local community.</p>

Paragraphs 5.19-5.21 Clarification should be given within these paragraphs that the Chelsea Barracks site is not anticipated to be able to accommodate the extensive list of sports facilities of the type referred to. Only at the very end of this section is it suggested that contributions may be made to this facility as part of a pooled fund implying acknowledgement of the fact that any requirement of this nature would need to be met by a number of stakeholders rather than a single site. This should be made clearer throughout this section.

It should be noted that any Section 106 obligation must meet the Secretary of State's policy as set out in Circular 5/2005, being required to satisfy the tests of reasonableness, necessity, are directly related and related in scale and kind to the development etc. The delivery of any Section 106 monies will also have to have regard to the overall viability of the development proposal. The brief should further recognise that any Section 106 requirements that are considered to be over and above impact mitigation should be offset against other potential on-site Section 106 requirements including the provision of affordable housing.

The brief should emphasise that any development must seek to ensure the best use of the land. It is important that the brief provides flexibility for the analysis of the commercial viability and management implications involved with incorporating these facilities on the site. The opportunity cost of reduced housing supply through the provision of such facilities and indeed of social and community facilities should also be addressed within the brief.

A swimming pool should be included within the Pimlico School Planning Brief and it is considered that this is a more appropriate location for this facility. The proposed rebuilding of the school could incorporate a pool that can be used by the public.

(Grosvenor)

It is recognised that the site may not be able to accommodate all potential needs. **Amend brief to prioritise facilities.**

Agreed.

This is an issue that is best addressed at scheme stage.

As previously noted, it is our understanding that an enhanced or new swimming pool facility at Pimlico school is unlikely to happen as part of the 'Building Schools for the Future' programme.

This obviously places a greater need for a sports facility at, or near to the Chelsea Barracks site.

	<p>The Partnership supports the need for additional swimming pool facilities locally, to meet the needs of the community. The swimming pool at Pimlico School is currently used for swimming sessions for Muslim women. The service is being delivered in partnership with 'A Moveable Feast', South Westminster's Healthy Living Centre and the Sure Start Children's Centre. This is because as the draft planning brief highlights, the public swimming pool in SW1 is already operating at capacity. In addition, council staff have advised that the layout of the pool makes it impossible (for health and safety reasons) to provide adequately 'screened off' swimming sessions whilst the centre is in use. Therefore, over the past year, partners have investigated other options to meet the needs of Muslim women locally, but due to the specific requirements for this service (complete privacy, segregated showers and changing facilities and childcare provision) Pimlico School has been identified as the only place that can host the sessions. The school has been very accommodating, and on-site crèche provision has also been facilitated. Unsurprisingly, there has been significant demand for the swimming sessions and it is anticipated that the service will be expanded over the next 12 months. The Partnership would strongly urge that one of the development sites (Chelsea barracks or Pimlico School) incorporates a pool that can continue to meet the needs of the community, particularly for BME and other groups who find it difficult to access mainstream services.</p> <p>If a sports centre is built on site, the design should also ensure that one or more of the fitness rooms allows for women only exercise in privacy. <i>(South Westminster Renewal Programme)</i></p>	<p>Currently, the Pimlico School pool is used for two hours weekly on Saturdays, for this purpose. As previously noted, it is our understanding that an enhanced or new swimming pool facility at Pimlico school is unlikely to happen as part of the 'Building Schools for the Future' programme.</p> <p>As noted, we would seek to ensure that a new leisure facility on the site would be designed to ensure diverse community requirements were met along with appropriate activity programming which is relevant to the local community.</p>
OTHER USES	<p>A request for an exhibition centre (to promote local businesses eg. the antique traders) on the site. <i>(South Area Forum)</i></p>	<p>An exhibition centre is a commercial use and would not be suitable on a site outside the CAZ.</p>

<p>We support the Brief's objective of seeking to maximise residential development on the site along with supporting retail and community uses. However, we suggest that the Brief allows for other uses where a clear case can be made with other uses to be judged on their individual merits.</p> <p><i>(GVA Grimley on behalf of Defence Estates)</i></p>	<p>Outside CAZ only community facilities, including shops and services, are permitted on large residential sites. Applications for other uses will be assessed on their merits.</p>
<p>The MPA welcome the reference to this potential land use need at paragraph 5.28 of the guidance.</p> <p>The MPA also welcome the statement at paragraph 6.1 <i>"that in order to maintain vibrant and viable local communities, it is essential to make adequate provision for the varied infrastructure needs, and social and community facilities required by residents, workers and visitors"</i>. Policing forms a key part of the essential social infrastructure of Westminster. Significant new development is proposed at the Chelsea Barracks site and there is no doubt this will increase the demands for policing.</p> <p>Within this context we believe the list of potential Section 106 contributions at paragraph 6.2 should be extended to include "contributions to policing". This would be consistent with the representations the MPA submitted concerning the Council's draft SPD on Planning Obligations by means of CgMs' letter of 25 April 2006.</p> <p><i>(CGM on behalf of the Metropolitan Police Authority)</i></p>	<p>Accepted that in exceptional circumstances, contributions towards policing / or facilities on site may be negotiated through S106 agreements</p>

<p>The society is somewhat alarmed at the possibility of such a targetable facility as a new home for the Metropolitan Police Diplomatic Protection Team within a predominantly residential development; such a presence could seriously (and regrettably) diminish the personal security of residents and it would not be welcome here.</p> <p><i>(Westminster Society)</i></p>	<p>The MPA's existing facility is in a residential area and we are not aware of any security issues. Furthermore many other police facilities are located in residential areas. Residents usually consider the proximity of the policing facility a security benefit. However, it is recognised that objections from local residents often need to be addressed when facilities are relocated. Also see comment below from Royal Borough of Kensington and Chelsea.</p>
<p>Para. 5.25 The Royal Borough notes and regrets the Metropolitan Police Services' notification to relocate its Diplomatic Protection Team. Its current base in Walton Street is located close to many sensitive sites within Knightsbridge and provides an important sense of security to the area.</p> <p><i>(RBKC)</i></p>	<p>Noted</p>
<p>The Society would welcome the development of a structure suitably flexible in design to house a range of community facilities including a health centre, a library, a playground and other uses (gymnasium, swimming pool and the like) as part of a focus to the development that would include any retail/catering establishments; this could form part of "village centre" at the core of the development.</p> <p><i>(Westminster Society)</i></p>	<p>Noted</p>
<p>It is imperative that we have another police station to control the new area as the Belgravia police station cannot even cope with their current remit and will be too stretched to take this area on as well.</p> <p><i>(Local resident)</i></p>	<p>Noted</p>

SUSTAINABILITY	<p>A strong view from a resident and member of the C20th Society that it would be more sustainable to keep the existing buildings on the site and refurbish them. There needs to be a full survey of the existing buildings to determine the costs and benefits of replacing/retaining them. <i>(South Area Forum)</i></p> <p>People were concerned that the trees on the site should be protected and retained. <i>(South Area Forum)</i></p>	<p>The City Council does not consider that the buildings on site contribute positively to the townscape of the surrounding area. Demolition can be carried out in a sustainable way by reuse of materials on site to minimise waste and transport. Therefore there is a strong presumption in the brief that the existing buildings, with the exception of the chapel should be demolished. The sustainable future use of this site would dictate that a new, higher density urban design is required with new buildings of a very high design standard with sustainability issues such as materials, energy and water use built in at the outset.</p> <p>This lends support to the stance taken in the brief. All trees on site considered worthy of protection are now subject to a TPO.</p>
	<p>Save the existing trees <i>(Local resident)</i></p>	<p>Agree. Brief does this. All trees on site considered worthy of protection are now subject to a TPO.</p>
	<p>All major trees should be protected. <i>(Local resident) (Local Business)</i></p>	<p>Agree. Brief does this. All trees on site considered worthy of protection are now subject to a TPO.</p>
	<p>Para. 9.1 Landscaping Reference should be made to the existing avenue of mature plane trees on Chelsea Bridge Road and its retention and protection during construction work. The trees make a very important contribution to the setting of the adjacent Royal Hospital Conservation area. <i>(RBKC)</i></p>	<p>Agree. The City Council seeks their retention as part of the draft brief (para 7.34). All trees on site considered worthy of protection are now subject to a TPO.</p>

	<p>Para.3.2 It appears that climate change is referred to almost as an after thought. Should this not be a major policy driver reflecting the potential impact it could have on Westminster. This is a landmark site so could be a best practise and exemplary credentials regarding Climate Change and climate change adaptation</p> <p>Para.7.31 Car Parking does not contribute very comfortably with the principles of sustainability.</p> <p><i>(Sustainability Appraisal/Strategic Environmental Assessment Officer City of Westminster)</i></p> <p>Para. 8.3 Achieving an Eco-home assessment of excellent should be mandatory rather than appropriate.</p> <p>8.12 This project will require an EIA, the threshold value for a major urban development project is .5 hectare.</p> <p>Para. 11.5 The impacts of climate change are not fully known. The risk of flooding could increase and applying the precautionary principle in this case could be prudent.</p> <p><i>(Sustainability Appraisal/Strategic Environmental Assessment Officer City of Westminster)</i></p>	<p>Change para. 3.2 <i>(i) Achieve a sustainable development in terms of design and construction, community facilities, waste, water and energy use, and other environmental considerations, such as climate change.</i> <u>It should also incorporate best practice in terms of adaptation to climate change.</u></p> <p>Partly agree but on the other hand if most of the new residents have cars they are unlikely to want to dispose of them, therefore it is important that these vehicles do not put further strain on already overstretched resident parking in the area. Measures can be taken to discourage car ownership and use, such as a car club, good public transport, safe walking routes, and good local services. The UDP policy has maximum parking standards, which will form the basis of discussions with the developer, sustainability issues will of course be an important consideration in those discussions and in the determination of parking facilities on the site.</p> <p>Agree. Change para. 8.3 to say <u>(the development should achieve BREEAM 'Excellent' or equivalent would be appropriate)</u></p> <p>Change para. 8.12 to <i>Policy ENV 2 of the UDP lists a number of developments for which Environmental Impact Assessments (EIA's) are usually required. Major urban development projects (defined as 0.5 ha or more) are included on this list so, given the potential impact of the scheme on the environment, an EIA could will be required for the proposed development. subject to the precise nature of the proposal.</i></p> <p>It might therefore be prudent to request open space or a suitably designed development on this small part of the site. Include in para. 11.5.</p>
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<p>Para 3.2 (iii) should be strengthened – we expect any development to be utilising the very latest environmental and sustainability technology and practices.</p> <p><i>(Cllr Alastair Moss – Chairman for Planning and City Development Committee)</i></p> <p>It would be most advantageous if the development could be linked to the Pimlico District Heating Undertaking thus making fuller use of that facility.</p> <p><i>(Westminster Society)</i></p> <p>The Society would expect that every part of the development should be as energy efficient as technology allows including the inclusion of solar power panels to roofs and the recycling of as much water as possible for alternative uses. <i>(Westminster Society)</i></p>	<p>Could change para. 3.2 <i>Achieve a sustainable development in terms of design and construction, community facilities, waste, water and energy use, and other environmental considerations, utilising the very latest environmental and sustainability technology and practices.</i> <i>(ii), such as climate change. It should also incorporate best practice in terms of adaptation to climate change.</i></p> <p>Agree</p> <p><i>This supports the draft brief.</i></p>
<p>Incorporating renewable energy methods as part of the redevelopment scheme is accepted but it is considered that the brief should address the uncertainty surrounding the costs associated with the sustainability agenda as these could change and potentially rise over time.</p> <p>The potential effects of the costs of complying the sustainability agenda on the overall quantum of planning benefits achieved must be recognised within the brief.</p> <p><i>(Grosvenor)</i></p>	<p>It is recognised that there is a potential level of uncertainty associated with the application of an exemplary sustainable agenda. But by being an exemplary development in term of sustainability will give the project positive kudos, reduce the energy costs, being seen as a leader in this field. This not only assists the end users of the development but also the organisation associated with its development.</p> <p>The incorporation of renewable energy is to assist in addressing climate change and the potential increased costs that could be incurred if the sustainable agenda is not endorsed.</p>

	<p>It would be most advantageous if the development could be linked to the Pimlico District Heating Undertaking thus making fuller use of that facility.</p> <p>The Society would expect that every part of the development should be as energy efficient as technology allows including the inclusion of solar power panels to roofs and the recycling of as much water as possible for alternative uses.</p> <p><i>(Westminster Society)</i></p>	<p>Agree, this needs to be investigated. Make further reference to Pimlico District Heating Undertaking in brief.</p> <p>Agree.</p>
<p>OTHER ISSUES</p>	<p>Grosvenor Waterside development has already disrupted the area for 3 yrs with dust and noise. Do we really have to have another 3 yrs of cleaning grit off my floor?</p> <p><i>(Local resident)</i></p>	<p>Though developers will need to adhere to the Code of Construction Practice, it is acknowledged that there will always be unavoidable disruption during any major site redevelopment.</p>
	<p><u>Paragraph 4.1</u> The Petrol Filling Station site at Ebury Bridge Road is a Grosvenor freehold. While there may be the opportunity for consolidation of facilities at Semley Place, the current operator has expressed an intention to re-commence selling petrol. It would be preferable therefore to exclude the site from the Brief.</p> <p><u>Paragraph 11.3</u> The brief should confirm that the City Council will work closely with the developer in order that the progression of Crossrail does not prejudice the proposed development.</p> <p><u>Paragraphs 12.5-12.7</u> The brief should address the costs involved with complying with the Code of Construction Practice.</p> <p><i>(Grosvenor)</i></p>	<p>Disagree. Leave in brief , though if the site does return to use as a petrol filling station, the City Council would wish to retain it and it can then be excluded from the brief.</p> <p>Plans regarding the development of Crossrail are public. The City Council works closely with Crossrail on the development of this route and implications for Westminster.</p> <p>Costs will need to be agreed at the scheme stage with the City Council's Construction Manager. Include words to this affect in para. 12.7.</p>

	<p>That consideration is given to surrounding neighbours privacy, possibly with the retention of the high wall surrounding the site. <i>(Pimlico & Knightsbridge Labour Party)</i></p>	<p>The northern boundary wall to the back gardens to the north of the site will need to be retained or at least replaced with a wall of the same height. The Chelsea Bridge Road boundary will be retained due to historic railings and trees. . The City Council will actively seek the removal of the high wall along Ebury Bridge Road which is one of the negative elements of the site in townscape terms. This will aid integration of the site into local community. Clarify in brief.</p>
	<p>Map 2 Neighbouring uses is incorrect in showing schools that do not exist and various other inaccuracies. Two of the <u>schools</u> shown on Map 2 have long gone – nursery school in Bloomfield Terrace, secondary (?) school in Bourne Street. Any potential developer should know there is no other nursery school provision by Westminster in this area to replace the Bloomfield Terrace school. <i>(Local resident)</i></p>	<p>Apologies, amend map for final version.</p>
	<p>Need adequate security whilst work is in progress. <i>(Local resident)</i></p>	<p>This is addressed in the Code of Construction Practice.</p>