

Paddington Green Police Station
2 – 4 Harrow Road, London, W2 1XJ

Planning Statement

Turley

March 2021

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Executive Summary

1. The redevelopment and delivery of the Paddington Green Police Station (PGPS) site represents the completion of Berkeley's Masterplan for the wider West End Gate site, phase 1 and 2 of which are currently being delivered (set out later in this statement). The West End Gate Masterplan is Westminster's single largest housing site, which in total across the three phases (including PGPS) will deliver nearly 1,400 new homes to Westminster including 385 affordable homes, alongside a range of complementary employment uses, transformative public realm and place shaping improvements.
2. The delivery of PGPS and the West End Gate Masterplan more generally is also essential to facilitate the delivery of the City Council's adjacent Church Street Masterplan. The West End Gate Masterplan is providing affordable homes for current Church Street residents, which will then free up sites within Church Street for their redevelopment as part of the Council's vision.
3. The PGPS site has been vacated by the Metropolitan Police after serving as the capital's highest security police station since the 1970's; comprising a front of house police station, offices, and a section house, alongside high security cells and custody suite. The site was earmarked for disposal as part of the Mayor's Office for Policing and Crime's (MOPAC) estate strategy, and the neighbourhood policing function has already been located to neighbouring Church Street.
4. Berkeley have been developing plans for the site's incorporation into the West End Gate Masterplan for some time now, and following the disposal of the site by MOPAC to Berkeley, this proposal has evolved over the last 18 months through extensive design development, informed by an ongoing process of consultation, both with Westminster and GLA officers, and with local residents, Councillors, and other stakeholder groups.
5. The submitted proposal transforms what is currently a hostile, 'fortress' island site reflecting the previous high security police function. The proposal opens up the ground floor and public realm, creating active uses, public spaces and new routes through and around the site for pedestrians and cyclists, connecting the site through to West End Gate and Paddington Green.
6. The ground floor is to be activated around the site by a range of commercial uses including shops, restaurants, affordable workspace for the local community, and offices at the first and second floor levels. Newcastle Place is transformed into a public linear park connecting Edgware Road and Harrow Road to Paddington Green, with vehicular access constrained to limited servicing and deliveries. Significant new tree planting will be delivered around the site, alongside the provision of extensive planting, new lawn areas, public art and water features alongside public seating and dwell spaces.
7. At the heart of the proposal is significant housing delivery, which underpins the proposals. There are three principal buildings delivered through the proposals, with their scale responding to the surrounding context around the site, as does the architectural approach and treatment which introduces variety across the three buildings, which are of the highest quality sustainable design and architecture.

8. The site is a key gateway junction into Westminster where the Westway terminates coming into Marylebone Road adjacent to the Paddington Basin. As part of these proposals, this key junction is marked by a slender tall building as part of these proposals on the corner of Edgware Road and Harrow Road, marking this gateway into the West End and a key area of activity around Paddington.
9. In terms of housing delivery, PGPS will deliver 556 new homes to Westminster, representing half of one year of Westminster's annual delivery target, and adding to the 844 homes already being delivered at West End Gate and Paddington Green. The site is of strategic importance to Westminster and London more generally, and by some way is the largest private sector led housing site in Westminster.
10. In terms of affordable housing provision, the proposal will be 'fast track' compliant, as 38% of the homes on site being affordable housing, comprising Social and Intermediate homes in line with Westminster policy and supporting the future redevelopment of neighbouring Church Street. The proposal will deliver significant housing choice including family sized housing, in homes that will meet all required standards of residential quality, while all homes will benefit from access to private and communal amenity space.
11. The site is subject to a portfolio agreement between the Mayor of London and MOPAC, which has been shared with Westminster officers. This agreement has two main purposes. Firstly the agreement ensures that a minimum of 35% affordable housing is delivered on the site at Paddington Green. Secondly it ensures that the strategic target of 50% affordable housing on public sites, as required by the London Plan policy, is met across the portfolio of MOPAC owned sites. The application complies with this agreement by providing 38% affordable homes on site. The remaining 12% of affordable homes is then to be provided at a former MOPAC site in LB Barnet, which is being brought forward for development by the GLA. The GLA have been able to agree in principle with LB Barnet officers that the first option on nominations for these offsite homes will be shared between WCC and LB Barnet.
12. As such the proposal will deliver significant public benefits of strategic importance to the delivery of the new Westminster City Plan and London Plan as detailed in this planning statement, both on this site individually, and in facilitating the delivery of Westminster's neighbouring Church Street Masterplan. The site will deliver strategically important levels of new housing and affordable housing to Westminster and London more generally, while delivering complementary commercial uses that will provide employment opportunities and economic benefits alongside affordable workspace for the local community. The development will generate significant CIL receipts for investment in infrastructure in the local area and Westminster more widely.
13. At the heart of the proposals is the transformation of the local environment, public realm and the townscape. New buildings of the highest quality sustainable design and architecture will be delivered alongside new pedestrian and cycle routes through and around the site, new public open space, play space, significant tree planting, greening and landscaping, in addition to informal and formal dwell space, while residents will benefit from private and communal amenity space. The proposals will deliver enhanced connectivity to the Paddington Basin, and contribute significantly to the Council's place

making ambitions for the Edgware Road and Harrow Road junction, and through to Paddington.

14. Central to this is the proposed stopping up of Newcastle Place, which will facilitate the re-orientation of the carriageway, and the holistic re-design of the entire space, putting pedestrians and cyclists first. Importantly, vehicular access will be controlled, and limited to small deliveries to the development only, meaning there will be no general traffic passing through Newcastle Place. All servicing more generally will take place off street and within the development, principally at basement level which connects through to West End Gate, accessed from Church Street as existing. The removal of vehicles and traffic facilitated by the stopping up proposal underpins the delivery of the substantial environmental improvements set out above and re-purposing of Newcastle Place as a calmer, inviting and active amenity space for the local community.
15. In addition, much like West End Gate and all other Berkeley sites across Westminster, the intention would be for the site to be delivered straight away from the grant of planning permission, ensuring the swift delivery of the scheme, and the significant associated public benefits.

1. Introduction

- 1.1 This Planning Statement has been prepared on behalf of Berkeley Homes (Central London) Ltd, in support of an application for full planning permission to Westminster City Council (WCC) for the following description of development at Paddington Green Police Station (PGPS), 2-4 Harrow Road, London, W2 1XJ:

‘Demolition and redevelopment of the site to provide three buildings, providing private and affordable residential units (Class C3), commercial uses (Class E), flexible community/affordable workspace (Class E/F.1), provision of private and public amenity space, landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing and disabled car and cycle parking, connecting through to the basement of the neighbouring West End Gate development.’

- 1.2 The site is bound by Harrow Road and The A40 Westway to the south, Paddington Green to the west, Newcastle Place to the north and Edgware Road to the east. The site has excellent public transport accessibility being directly opposite Edgware Road Underground Tube Station (serving the Bakerloo, Circle, District, Hammersmith & City Lines), in close proximity to Paddington Railway Station and being serviced by a number of bus routes.
- 1.3 The existing site consists of a single, interconnected building, albeit with a number of different, interrelated built forms. This includes the 17 storey accommodation/section house on the eastern side of the site, a main office and police front of house 3-storey building below this on the eastern side of the site, and an 8 storey annex at the western side of the site, connected by a single storey building that previously housed high security cells. The site also includes a single level of basement and a surface level podium car park to the rear, both accessed from Newcastle Place.
- 1.4 The western side of the site (the Annex) is in lawful use as offices following the grant of an associated planning permission in 2020. The remainder of the site is largely vacant having been disposed of by the Metropolitan Police as part of the Mayor’s Office for Policing and Crime’s (MOPAC) estate strategy, having previously housed a range of local and London-wide police functions. This included a neighbourhood front of house police service which has since relocated to neighbouring Church Street, section house accommodation serving the whole of London, high security custody suite and cells, and a series of offices accommodating pan-London police functions and services.
- 1.5 The front of house community policing desk closed at Paddington Green in 2018, and the site has been largely vacated since then, with all services relocated to other parts of the Metropolitan Police estate in line with their estate management plan. The police then used the site on an ad-hoc basis until Berkeley Homes acquired the site mid-2020, since when the site has been subject to well publicised squatting and anti-social behaviour. This has since been addressed, with part of the site having come back into lawful use as offices following the recent grant of planning permission (see above and below).

- 1.6 The existing buildings are of no architectural merit and their demolition has been accepted and is fully supported by Planning and Design and Conservation officers at Westminster and the GLA, in order for the site to be comprehensively redeveloped.
- 1.7 The redevelopment of this site will be the third (and final) phase of the West End Gate (WEG) Masterplan which, to date, is the single largest housing site in Westminster, delivering a total of 844 homes. WEG commenced construction in 2017 with Block C (along Edgware Road) being the occupied in 2020, , Block B and D follow in 2021 these blocks will consist solely of affordable homes, which have been taken on by Westminster Council.
- 1.8 The applicant has undertaken extensive pre-application discussions with the WCC and the Greater London Authority (GLA) which has better informed the design, setting and layout of the proposed residential-led mixed use development. Discussions have also taken place with Transport for London (TfL) to better inform the highway works, construction and logistics of the scheme and the proposed stopping up of Newcastle Place which will allow ease of travel within the development site and deliver transformative landscaping and public realm improvements. This is in addition to a comprehensive public consultation exercise as set out in this Statement and supporting documents to the application.
- 1.9 Berkeley Homes are a nationally recognised house builder, committed to delivering high quality new homes across London. The business has successfully gained planning permissions on a number of large, residential led mixed use schemes within Westminster in recent years which were all commenced and occupied as early as possible, demonstrating a track record for delivery and quality. A summary of recent schemes is set out below:
- 190 Strand was granted planning permission in March 2012 with works commencing the same year following the approval of all pre-commencement conditions. The scheme built 216 new residential units was completed in January 2018.
 - 9 Millbank and Ergon House was granted planning and Listed Building Consent (LBC) consent in July 2014 with works commencing in 2017. The scheme is creating 202 new residential units is due to be complete in January 2022.
 - West End Gate was granted planning permission in April 2016 with work commencing on site in 2017. Phase one (Blocks A - E/F) which creates 628 new residential units is due to be completed by 2022.
 - 14 – 17 Paddington Green which is phase two (Blocks G - H) of WEG Masterplan was granted planning and Listed Building Consent in December 2017. Demolition commenced in 2019 and completion is expected in 2025. The scheme will create 216 additional new units
 - Ebury Square was completed in 2014, providing 71 high quality homes at the heart of Belgravia, and was also designed by Squire & Partners.

- Abel and Cleland House was completed in 2016, delivering 206 homes in the heart of Pimlico, a short distance from 9 Millbank and Ergon House, comprising two buildings with interconnected public realm and landscaping.
- 1.10 This Planning Statement analyses the Proposed Development against the National Planning Policy Framework (NPPF), the Development Plan and the relevant material planning considerations.

Content of application

- 1.11 The application has been submitted electronically via the Planning Portal.
- 1.12 The application is accompanied by an Environmental Statement (ES) prepared by Ramboll which assesses the impacts of the Proposed Development, which has been developed in the context of a comprehensive ES scoping exercise with Westminster and other relevant stakeholders. Additional individual technical reports and plans are submitted as detailed below.
- 1.13 An overview of the submission documents accompanying this application is provided below:
- Covering letter
 - Planning Application Form
 - CIL ‘ Additional Information’ Form
 - Payment of the statutory application fee of £92,687 plus £25 admin charge is made directly to the Planning Portal
 - Site Plan and Site Location Plan, prepared by Squire & Partners
 - Existing and Proposed Plans, Elevations, Sections, Demolition Plans and accompanying drawings register, prepared by Squire & Partners
 - Design and Access Statement (DAS), including Landscaping strategy and associated plans, prepared by Squire & Partners
 - Structural Statement (Chapter within DAS), Prepared by WSP
 - Illustrative drawings containing plans and elevations, prepared by Squire & Partners
 - Area schedule, prepared by Squire & Partners
 - Unit mix schedule, prepared by Squire & Partners
 - Planning Statement prepared by Turley (this document)
 - Heritage Statement, prepared by Montagu Evans
 - Daylight and Sunlight Report, Prepared by GIA

- Energy Assessment, prepared by WSP
- Sustainability Statement, prepared by WSP
- BREEAM Pre-assessment, prepared by AESG
- Drainage Strategy Report, prepared by WSP
- Transport Assessment, prepared by Arup
- Arboricultural Report, Tree Fabrik
- Code of Construction Practice Appendix A, Berkeley Homes
- Statement of Community Involvement, prepared by Concilio
- Ventilation Statement, prepared by WSP
- Waste Management Strategy, prepared by Squire & Partners
- Lighting Strategy, prepared by Squire & Partners
- Biodiversity Net Gain, prepared by Ramboll
- Health Impact Assessment, prepared by Ramboll.

Environmental Statement

1.14 The following documentation is submitted as part of the Environmental Statement:

- Non-Technical Summary (NTS);
- Volume 1: Main Environmental Statement;
 1. Introduction;
 2. EIA Process and Methodology;
 3. Alternatives and Design Evolution;
 4. Proposed Development Description;
 5. Demolition and Construction Description;
 6. Socio-Economics;
 7. Air Quality;
 8. Noise and Vibration;
 9. Wind Microclimate;
 10. Daylight, Sunlight, Overshadowing and Solar Glare;
 11. Cumulative Effects;
 12. Summary of Residual Effects and Glossary of Terms and Abbreviations
- Volume 2: Townscape, Visual and Built Heritage Assessment (TVBHA);
 - Technical Appendix 1.1: Legislation and Policy
 - Technical Appendix 1.2: AVR Methodology
 - Technical Appendix 1.3: Map of Townscape Receptors

- Technical Appendix 1.4: Map of Heritage Receptors
- Technical Appendix 1.5: Zone of Theoretical Influence
- Technical Appendix 1.6: Map of Viewpoint Locations
- Technical Appendix 1.7: List Entry Descriptions

- Volume 3: Technical Appendices
 - Technical Appendix 1.1: IEMA Quality Mark Checklist
 - Technical Appendix 1.2: Regulation 18(5)(b) Statement
 - Technical Appendix 2.1: EIA Scoping Opinion Request Report
 - Technical Appendix 2.3: Avison Young EIA Scoping Independent Review
 - Technical Appendix 2.3: EIA Scoping Opinion
 - Technical Appendix 2.4: Ecological Impact Assessment
 - Technical Appendix 2.5: Ground Conditions Preliminary Risk Assessment
 - Technical Appendix 2.6: Archaeological Desk Based Assessment
 - Technical Appendix 2.7: Flood Risk Assessment Statement
 - Technical Appendix 2.8: Transport Data
 - Technical Appendix 6.1: Socio-Economic - Planning Policy and Legislation
 - Technical Appendix 6.2: Socio-Economic - Magnitude Thresholds
 - Technical Appendix 6.3: Pupil and Net Capacity Forecast Data
 - Technical Appendix 6.4: Socio-Economic Cumulative Schemes Details
 - Technical Appendix 7.1: Air Quality Legislation, Policy and Guidance
 - Technical Appendix 7.2: EHO Consultation
 - Technical Appendix 7.3: Model Inputs and Results Processing Tools
 - Technical Appendix 7.4: Air Quality Background Concentrations, Transport Data and Model Verification
 - Technical Appendix 8.1: Noise and Vibration Legislation and Policy
 - Technical Appendix 8.2: Baseline Noise and Vibration Survey
 - Technical Appendix 8.3: Construction Noise Assumptions
 - Technical Appendix 8.4: Transport Data
 - Technical Appendix 8.5: Site Suitability Assessment
 - Technical Appendix 10.1: Drawings
 - Technical Appendix 10.2: Daylight and Sunlight Assessment (Surrounding Properties)
 - Technical Appendix 10.3: Daylight and Sunlight Assessment (West End Gate and Merchant Square)

Planning Statement Structure

1.14 The format of this Planning Statement is as follows:

- Section 2 'Site and Surrounding Area': describes the site and its surrounding context.
- Section 3 'Planning History': sets out a summary of the relevant planning history for the site, and neighbouring sites of relevance.
- Section 4 'Proposed Development': provides a detailed description of the proposed development, highlighting the key aspects of the scheme.

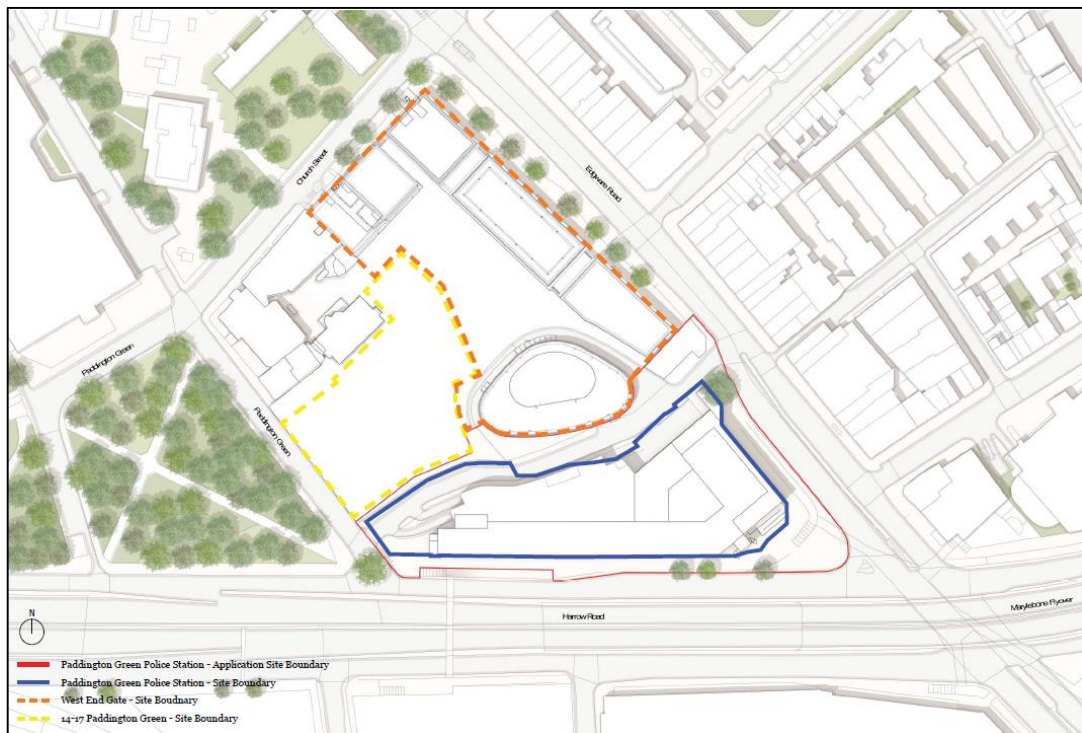
- Section 5 'Pre-application engagement': details the process undertaken with WCC prior to submitting this application, and the evolution of the proposals.
- Section 6 'Planning Policy Context': sets out the relevant development plan and planning policy framework against which the planning application should be assessed.
- Section 7 'Planning Policy Considerations': provides an analysis of the material planning considerations pertinent to the proposed development and provides justification for the development and outlines the findings of the supporting specialist reports.
- Section 8 'Planning Obligations': identifies likely heads of terms for inclusion in a section 106 agreement with the council.
- Section 9 'Public Benefits Summary': sets out all public benefits that are associated with the delivery of the scheme.
- Section 10 'Summary and Conclusions': summarises the key features of the proposed development, key considerations and sets out our concluding statements.

2. Site and Surroundings

The Application Site

- 2.1 The site comprises the Paddington Green Police Station, located at 2-4 Harrow Road, W2. The site is located on the north-western corner of the junction between Edgware Road (A5) and the Harrow Road (A404)/Marylebone Flyover (A40), and is bound by Newcastle Place to the north. Berkeley's West End Gate development site is located directly adjacent to the north of the site, which is under construction at the moment, constituting Westminster's single largest housing site. The site makes up the final element of the West End Gate Masterplan which is shown in Figure 2.1 below.

Figure 2.1: Site location (outlined in solid red line) and context within wider WEG Masterplan



- 2.2 More generally, the site is adjacent to the Paddington basin (designated in the City Plan as the Paddington Opportunity Area) which is located to the south of the A40. To the west is Paddington Green, an area of open space, while Westminster's Church Street Housing Renewal area is located to the east of the site. The site is adjacent to Edgware Road London Underground Station, and is a short distance from both Paddington and Marylebone mainline and London Underground stations.
- 2.3 In terms of built form, the subject site is an island, (see Figure 2.1 above and 2.2 below) which was constructed in the early 1970's. It comprises three distinct but interconnected built forms (a single building) as shown on Figure 2.2 below. A podium level extends across a majority of the site at ground floor, including two partial additional levels above this on the eastern side.

- 2.4 There are then two taller elements, comprising a principal ground + 16 upper storey tower on the eastern side of the site, and a ground + 7 upper storey element at the western side of the site. On the northern side of the site is a surface level car park within the site, and there is a basement level to the building providing parking and other floor space, accessed externally via a ramp from Newcastle Place on the northern side.
- 2.5 The site is adjacent to the Edgware Road London Underground Station (Bakerloo, Circle, District, Hammersmith & City Lines), and is roughly 500m from Paddington and Marylebone mainline railway stations, providing excellent public transport accessibility.

Figure 2.2: Photo of existing site



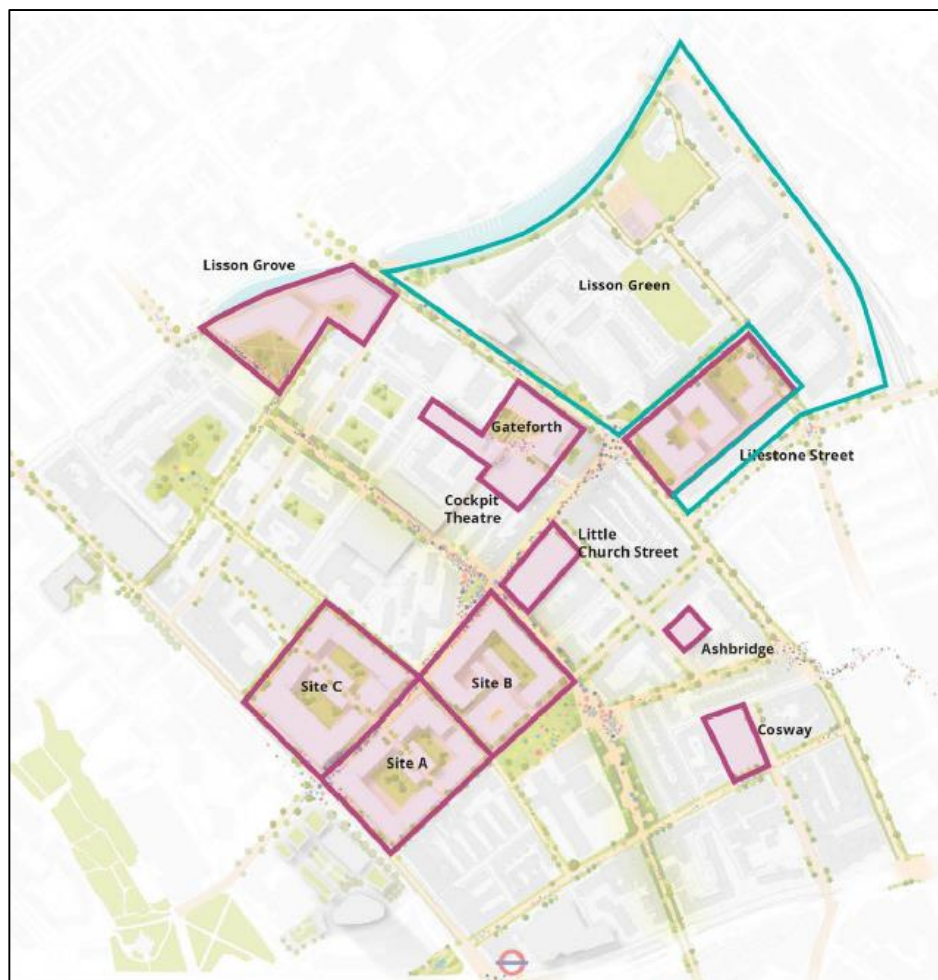
- 2.6 The site is located within the Central Activities Zone (CAZ), specifically the Marylebone and Fitzrovia sub area (2016 City Plan), is within the Mayor's Edgware Road Housing Zone, identified in 2014 to facilitate the delivery of 1,113 new homes and is designated as a key site within the housing trajectory of Westminster's emerging City Plan as part of the Council's Edgware Road/Church Street Housing Renewal Area.
- 2.7 The majority of the site is not located within a conservation area, save for a small parcel at the north western half of Newcastle Place which sits within the Paddington Green Conservation Area. The site does not contain a listed building. The site is located opposite and immediately to the south of the Church Street / Edgware Road District Shopping Centre.

Surrounding Context - Church Street Masterplan

- 2.8 The Council's Church Street Masterplan seeks to deliver transformative improvements to the area and make Church Street *'the most liveable neighbourhood in London through investment and regeneration.'*

- 2.9 A number of key plans and report have guided and informed the Masterplan development including The Futures Plan (2012 – and subsequently updated) which is bringing forward a number of development schemes including Luton Street (RN: 17/08619/FULL) which is providing 170 new homes and has commenced, the Edgware Road Housing Zone (2014) and the City for All Programme (2017).
- 2.10 Seven areas have been identified for development in the Masterplan to come forward by 2032, including, Ashbridge, Cosway, Lilestone Street, Church Street sites (A, B and C), Lisson Grove, Gateforth and Cockpit Theatre and little Church Street.
- 2.11 The West End Gate Masterplan as a whole has a critical role to play in delivering the Council’s Church Street Masterplan (separate to the applicants WEG Masterplan). The development is delivering significant affordable housing that has been taken on by the City of Westminster as new accommodation for existing Church Street residents. This will free up sites within Church Street for redevelopment as part of the Church Street Masterplan. West End Gate also delivers a re-activated commercial frontage to Edgware Road District Shopping Centre and delivers significant public realm and environmental benefits in line with principles and objectives of the Council’s vision for this area.

Figure 2.3: Church Street Masterplan

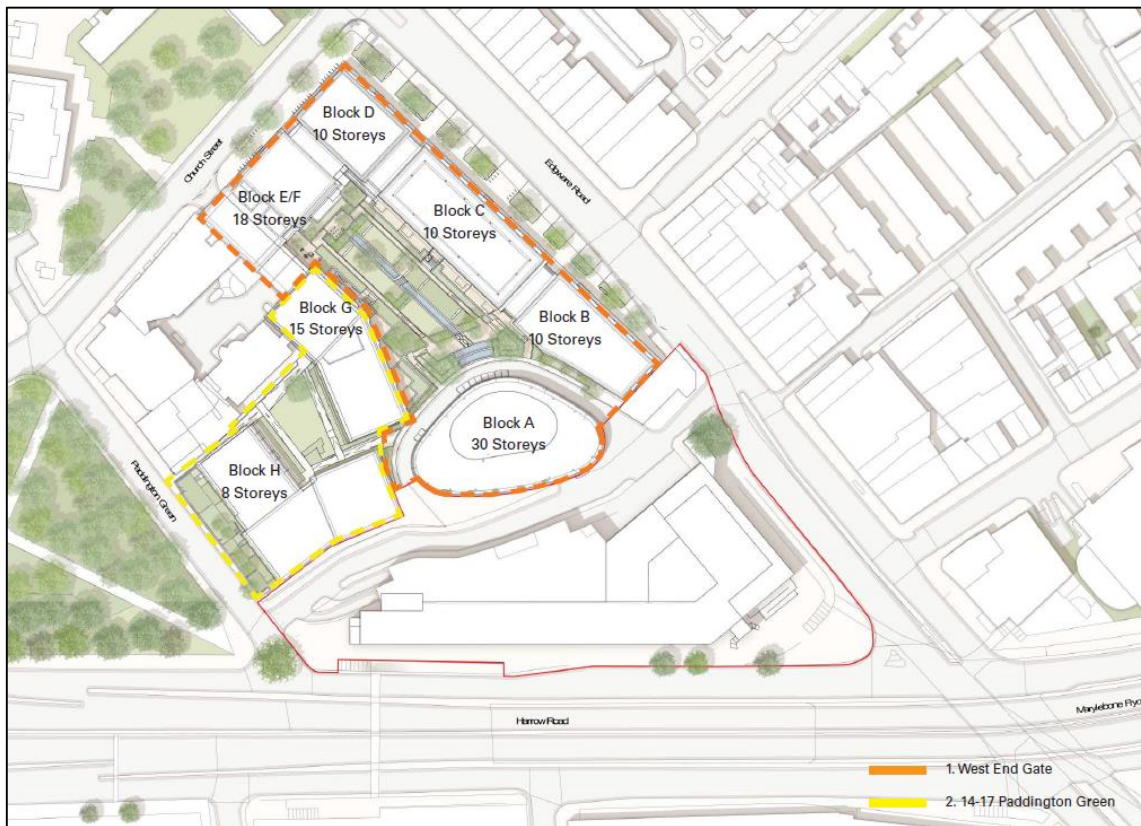


- 2.12 In summary the Church Street Masterplan seeks to deliver:
- Circa 1,750 new homes, of which 35% of these will be affordable.
 - Improved street market with around 220 stalls, 150 van parking spaces, 3,600sqm storage and facilities
 - Affordable and flexible workspace and business support facilities
 - A new cultural quarter centred around the antiques market and Cockpit Theatre
 - Around 3,500 construction-related jobs and 525 retail jobs
 - 7,000sqm retail space provision
 - A 20mph traffic calmed zone to improve the public realm opportunities
 - A new pedestrian priority street designed for Church Street market, pedestrians and cyclists which links Lisson Grove to Edgware Road
 - Up to 40% increase in publicly accessible open space
 - A health and well-being hub
 - A new community hub

West End Gate and Paddington Green developments

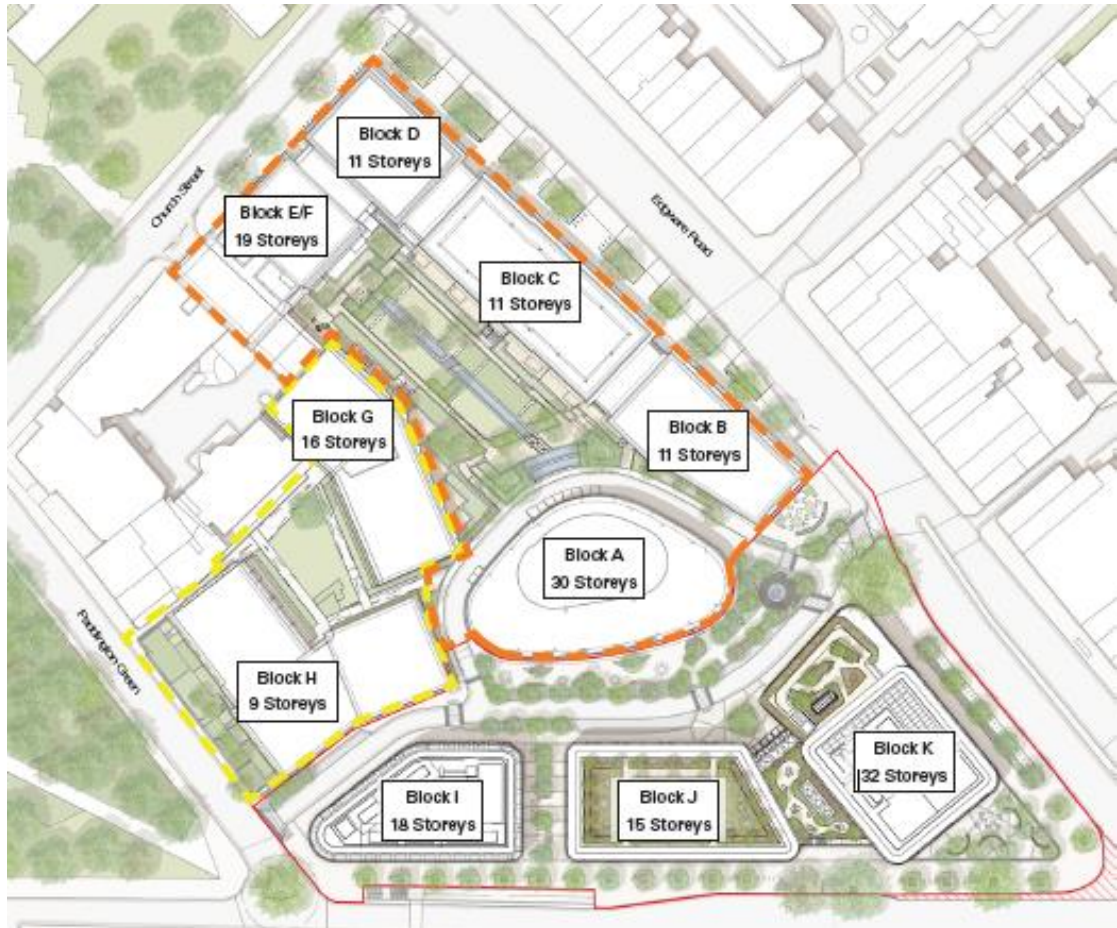
2.13 As set out in section one, this development will be the third and final phase of the WEG Masterplan as seen in figure 2.4. Phase one, to the north which is delivering circa 550 new homes is currently under construction, with Garret Mansions (Block C) being fully occupied and the 30 storey Westmark Tower (Block A) also now becoming occupied. This initial phase (Blocks A – E/F) as seen in figure 2.4 below is expected to be complete and mostly occupied by 2022.

Figure 2.4: West End Gate phase one and two alongside existing PGPS



2.14 Phase two, to the north west of the site, facing Paddington Green, which is delivering circa 216 new homes includes blocks G and H and is expected to be completed in 2025.

Figure 2.5: WEG Masterplan alongside PGPS (Masterplan Phase 3)



3. Planning History

3.1 The recent planning history is summarised below in table 3.1.

‘Annex’ Change of Use to Office

3.2 The key recent planning history relates to a consented application for the change of use of the annex part of the site at the western end of the site for office use under Class E. This was consented in December 2020 and has been implemented, establishing the office use at the site.

3.3 The older planning history mainly relates to older operational works at the site. There are further advertising applications for a public call box, applications for the temporary installation of public art, and for the installation of telecommunications and CCTV equipment on the building.

Table 3.1: Relevant planning history

Planning reference	Description of development	Status
20/06527/FULL	Use of the annex part of the site as an office (Class E).	Approved 11 December 2020
20/05827/EIASCO	Request for a scoping opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for redevelopment of the site, including demolition of existing police station, excavation of basement, erection of three blocks containing approximately 650 flats (including 260 affordable flats) and 8250sqm of Class E floorspace and stopping up of Newcastle Place.	Approved 25 March 2021
01/06109/FULL	Erection of a replacement covered walkways between police station and office annex at first floor level	Approved 08 August 2001
95/04667/1884	Panel & Glazed Infill To External Covered Way	Approved 15 August 1995
94/00394/1884	Proposed Replacement Of 2 Security Huts	Approved 28 January 1994
91/04645/1884	Repositioning Of Observation Post	Approved 18 October 1991
91/03630/1884	Single Storey Extension To Provide Cloakroom / Baggage Store	Approved 27 August 1991

91/00634/1884	Access Ramp For The Disabled At Main Entrance To Paddington Green Police Station On Harrow Road	Approved 12 March 1991
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- 3.4 The building was originally consented in the late 1960's (ref. A.174.66) as a 'Divisional Police Station, district headquarters, and section house.' It is understood that construction on the building was completed in 1971.

WEG Masterplan - Phase one and two Planning History

West End Gate (Phase one)

- 3.5 As the redevelopment of this site will form the third phase of the WEG Masterplan, it is important to also understand the wider consents permitted on WEG and 14-17 Paddington Green as set out below.

- 3.6 Phase one of West End Gate was granted planning permission in April 2016 (RN: 15/11677/FULL) for:

“Redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 652 residential units (including 126 affordable housing units), landscaping and associated car and cycle parking. This application is accompanied by an Environmental Impact Assessment (EIA) (Revised Description)”

- 3.7 Subsequently, two Minor Material amendment applications have been approved relating to:

- The incorporation of 283 Edgware Road into the site, extension of Block B to provide 20 additional residential units (672 in total), with associated swap in housing tenure with Blocks E and F, associated amendments to permitted public realm and landscaping strategy. Approved 27 January 2017 (RN: 16/07226/FULL).
- The amendment to the façade of Block A, and ground floor arrangement of Block A including residential drop off and ancillary residential uses, with associated amendment to landscaping plan. Approved 24 May 2017 (RN: 16/12162/FULL).

- 3.8 A number of non-material amendments have also been approved which can be summarised as follows:

- Amendments proposed to the unit mix on floors 1-10 of Block A at ground floor of Block C and all floors of Blocks G and H, inclusion of an additional bay of private residential balconies on floors 1-10 of the south facing elevation of Block A. Reduction in the footprint of block C. Approved 4 October 2016 (RN: 16/08442/NMA).
- Alteration to internal residential layouts, building footprint and exterior of Block D. Approved 9 November 2016 (RN: 16/10019/NMA).

- Optimisation of consented internal residential layouts to all floors of Block B and to vary the wording of planning conditions 49 and 34 in order to make them achievable and better address their original intention. Approved 24 April 2017 (RN: 17/02701/NMA).
- Amalgamation of units on 11th floor, 20th floor and 23rd floor. Approved 18 January 2018 (RN: 17/11430/NMA).
- Optimisation of internal layouts, the introduction of additional bays of inset balconies on the 9th and 10th floor and unit configurations which will result in an alteration to the unit mix within Block C and an overall increase of 4 unit numbers across the whole West End Gate development. Approved 28 June 2018 (RN: 18/05466/NMA)
- Reconfiguration of ground floor, removal of one side entrance canopy and reduction and redesign of front main canopy. Approved 26 Jul 2018 (RN: 18/05592/NMA).

14 – 17 Paddington Green (phase two)

- 3.9 Redevelopment of 14 – 17 Paddington Green was first consented on 21 December 2017 for the following description of development:

“Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide buildings ranging between 4 and 14 upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. This application is accompanied by an Environmental Impact Assessment (Linked to application RN: 16/11563/LBC)”

- 3.10 A Minor Material Amendment application was granted on 29 March 2019 (RN: 18/08004/FULL and 18/08110/LBC) to allow the addition of one floor of residential accommodation to Block G and to parts of Block H to add 16 residential units and to reduce carbon offset payment to allow connection to Church Street District Heating Scheme.
- 3.11 The full planning history for both West End Gate and 14 – 17 Paddington Green, detailing all consents can be found in Appendix two.

MOPAC Estate and Disposal Strategy and relocation of Front of House Police Function

- 3.12 Paddington Green Police Station was identified some time ago for closure and disposal as part of the MOPAC Estate Strategy. The Police & Crime Plan 2017-2021 commits to investment in the tools that police officers need to do their jobs, and invest in core buildings to create a modern environment for staff and the public.
- 3.13 In support of that objective, the disposal of surplus properties is set out to general capital receipts in support of the capital programme. A number of properties were identified and approved for disposal in 2018/19, which included the Paddington Green Police Station.
- 3.14 As part of this, the front counter and Dedicated Ward Officers located at Paddington Green were relocated to adjacent Church Street by June 2018, which then meant there were no public facing functions and the building was vacant.

- 3.15 From that point until the exchange/sale of the building to Berkeley Homes in 2020, the MET Police used the building sporadically for parking and logistical functions in support of significant events policing, firearms training and other more ad hoc activities. As set out above, part of the site is currently occupied and in lawful use as offices, following the grant of a relevant change of use planning application in December 2020.

Church Street Front Counter Relocation Planning Permission

- 3.16 Planning permission was granted in December 2017 under application ref. 17/07447/FULL for the creation of a Neighbourhood Policing Hub (Sui Generis Use Class) at 80A and 88 Church Street, a short distance from the existing Paddington Green Police Station.

- 3.17 This counter service opened in the summer of 2018, relocating the operational front counter from Paddington Green to this new location, ensuring this valuable social and community use was re-provided in the direct vicinity of its previous location, in a more fit for purpose bespoke facility at the heart of the neighbourhood's main commercial shopping centre on Church Street.

Relocation of Other Functions

- 3.18 The other functions previously housed at Paddington Green were relocated to other parts of the Metropolitan Police Estate. Many of the services had a pan-London focus or function, and did not just serve the City of Westminster. This was the case for the section house accommodation (alternative accommodation is available at the Gilmore Section House in Kennington), the pan-London and national services including the Territorial Support Group, the Road Traffic Investigation Unit, and other general administrative and management functions – which relocated to appropriate space in other police stations and office buildings across the Metropolitan Police Estate.
- 3.19 None of these services have been lost, and they continue to function and serve the City as they previously did when they were housed at Paddington Green. While therefore lost from Paddington Green, this was done as part of the Metropolitan Police's established estate strategy.

4. Proposed Development

Summary of the Proposals

- 4.1 This application seeks full planning permission for the comprehensive redevelopment of the site. The proposal is for demolition of the existing building followed by the delivery of a residential-led mixed use development of the site, delivering active employment generating uses at the lower levels to the street, with strategically significant levels of housing delivery across the site, including exceeding the policy compliant on site affordable housing provision.
- 4.2 More generally, the approach to the proposals is based on repairing the existing hostile street and pedestrian environment, putting place making and environmental improvements at the heart of the proposals, and completing the ambition being delivered across the West End Gate Masterplan.
- 4.3 A key part of this is the proposed stopping up of Newcastle Place, which creates the opportunity for significant new high quality landscaping and public realm works to be delivered, in an environment that prioritises pedestrian and cycle access, with vehicle access limited to small scale servicing only.
- 4.4 The proposed development would comprise the following:
- Demolition of the Paddington Green Police Station buildings;
 - Excavation of level one and level two basements with a connection into the WEG development basement (connection to energy centre with combined heat and power (CHP) plant).
 - Erection of three blocks ranging from 15 storeys to 32 storeys, set back from Harrow Road and Edgware Road;
 - Stopping up of Newcastle Place to deliver associated landscaping and public realm masterplan, including significant new tree planting and greening, prioritising pedestrian and cycle access, with vehicular access limited to small scale servicing/deliveries only;
 - Creation of new pedestrian and cycle routes between and around the three proposed blocks;
 - Significant new hard and soft landscaping including new public amenity space and play space, public art and other landscape features;
 - Creation of 556 new homes, including 210 affordable homes, falling within Use Class C3 of The Town and Country Planning (Use Classes) Order 1987 (as amended);
 - 6,178 (GIA) of flexible non-residential floorspace falling within Use Classes E to deliver offices and retail uses;

- Public open space and residential gardens (Block J and Block K);
- Private residential amenities;
- 18 accessible car parking spaces (within basement);
- 960 long term cycle storage spaces for residential, office and retail use. 10% shortfall in on-site cycle parking provision will be met in West End Gate – which will be subject to a separate amendment application to deliver this.
- Servicing to take place fully within the development; namely through the WEG basement, and to Newcastle Place for small deliveries.
- Residential, commercial office and retail refuse stores.
- All ancillary access, mechanical and electrical plant and soft/hard landscaping.
- Significant carbon reduction, substantial biodiversity net gain and comprehensive sustainability strategy including on site renewable energy generation.

4.5 The proposed description of development is provided in paragraph 1.1 of the Introduction. The proposals have been developed in close consultation with Westminster officers and through extensive public consultation and stakeholder engagement. In addition, the proposals have been developed in consideration of emerging and newly adopted planning policy at all levels, and will deliver extensive public benefits through the extent and nature of the scheme.

Scale, Massing & Layout

4.6 As set out above, the existing site comprises a taller building of ground + 16 storeys on the eastern end of the site, with a shorter building of ground + 7 storeys on the western end facing Paddington Green, stepping down further in the middle to ground. This hierarchy is maintained in the proposals, albeit the new proposals entail taller buildings. The existing building has no architectural merit, being modern and utilitarian, reflecting the high security nature of the former use. As such, it contributes little to the townscape, and the principle of its redevelopment is considered to be uncontroversial. Elements of the existing public art found on the Harrow Road frontage are however of some merit and will be retained and re-purposed in or around the site (TBC).

4.7 The new site layout has been driven by the unique form of the existing Paddington Green Police Station site and the need to introduce much needed permeability into the urban block/island site, to help repair the broken streetscape. A series of links from Harrow road will run north into Newcastle Place to allow for more pedestrian movement into and through the site.

4.8 The proposed development is split across three blocks (I, J and K), with Blocks J and K linked at ground and first floors. The layout of these blocks and surrounding landscaping proposals is illustrated in Figure 4.1 below.

- 4.9 Block K, the 32 storey tower, is located on the South Eastern end of the site at the important junction of Edgware Road and Harrow Road that helps to mark the gateway into the city centre.
- 4.10 At the South Western end of the site, Block I has been placed to pick up on the importance of Paddington Green and mark the entrance to the wider West End Gate Masterplan through Newcastle Place.
- 4.11 Block J is the central mansion block which has been developed to maximise the extent of light penetration to the centre of the site and provide a play on scales across the site, drawing inspiration from the existing mansion blocks from nearby existing blocks in Maida Vale and the WEG Masterplan.

Figure 4.1: Proposed site layout



- 4.12 The proposed heights of each of the buildings are as shown in Table 4.1 below.

Table 4.1: Proposed Building Heights (in storeys and AOD)

Block	No. of Storeys	Height in AOD (top of parapet)	Height in AOD (top of plant screen)
I	18	94.35	97.64
J	15	86.48	89.32
K	32 and 25	142.95	146.34

- 4.13 All three block provide active commercial frontages to Harrow Road, Edgware Road and the former Newcastle Place, comprising E-class units of varying sizes likely including new shops, café's, and affordable workspace. This will provide employment opportunities for local residents, and local services for the existing and future residential and worker community.
- 4.14 Residential access to all three blocks is via the former Newcastle Place as well as an additional access to Block K being on the corner of Edgware Road.

Residential Accommodation

- 4.15 The Proposed Development is for a total of 556 residential units across Blocks I, J and K, delivering a strategically significant number of new homes to Westminster, representing over half of one year's worth of Westminster's annual housing delivery target, and over 5% of Westminster's ten year London Plan housing target through this single site.
- 4.16 The proposals have been developed to deliver a mix of tenures dispersed across the three buildings. Block K (on the corner of Edgware Road) is solely private development whilst Block I and J have mix of private development, Intermediate and Social Rented tenures, and have been developed in consultation with Westminster's Affordable Housing manager. This approach, combined with the high quality design and facade articulation to all buildings ensures a tenure blind approach to the scheme.
- 4.17 The accommodation schedule submitted alongside this application details the full breakdown of the proposed housing mix, split 62% private development and 38% affordable housing. A summary of the type and amount of units proposed across each of the blocks is provided in Table 4.2 below.

Table 4.2: Proposed Housing Mix Summary

Tenure	Manhattan	1bed	2bed	3bed	4bed	Total
Private	32	107	102	98	7	346
Social	0	8	41	34	1	84
Intermediate	0	82	44	0	0	126
Total Units	32	197	187	132	8	556
Total (%)	5.8	35.4	33.6	23.8	1.4	100%

Affordable Housing

- 4.18 The applicant seeks to deliver 210 affordable housing units (38%) on site, in excess of Westminster and London Plan policy for the site. The off-site provision is discussed more in Section 7 of this report, but revolves around providing exceptional benefits to Westminster by delivering nomination rights to further affordable housing being delivered in the London Borough of Barnet as part of MOPAC's wider estate strategy.

Residential Quality

- 4.19 The proposed homes have been designed to maximise a 'dual aspect' orientation where feasible. Over 60% of apartments offer dual aspect views, with the overwhelming majority of the single aspect units facing south, east or west.
- 4.20 All units meet and exceed the London Plan, Westminster City Plan and Nationally Described space standards, and comply with the requirements of The Mayor's Housing SPG (2016).
- 4.21 Each apartment has at least one private balcony accessed off a main living space. These have been arranged to provide the best views and environmental responses for each home.
- 4.22 All residential units will benefit from floor-to-ceiling heights of 2.5m in living areas and bedrooms, while all other residential standards as set out in the London Plan and City Plan are met, delivering homes of high quality.
- 4.23 10% of the units are to be accessible for wheelchair users, with the remaining 90% being adaptable, and following the design principles of AD Part M4(3) and British Standard 8300:2018. All apartment layouts fully comply with AD Part M4 (3) and are easily accessible (please refer to the Access Statement in section 9 for further details).

Landscaping, Private and Public Amenity Space

- 4.24 The proposal provides significant new public and private open space within the site, with a particular focus on the reimagining of Newcastle Place as a new urban oasis and destination within the wider area, providing a new key pedestrian and cycle route through from Edgware Road to Newcastle Place.
- 4.25 This is delivered through the proposed stopping up of Newcastle Place, which will ensure the delivery of the high quality landscape masterplan, which is based on prioritising access for pedestrians and cyclists, and limiting vehicular access for very limited servicing only. This will deliver a significant benefit to the local area, which is generally quite car dominated and not easy for pedestrians and cyclists to negotiate, thus providing an oasis away from Edgware Road and Harrow Road.
- 4.26 The residential units all have balconies which acts as occupier's main private amenity space, in addition to communal roof top amenity spaces for all resident's enjoyment, and the public open space provided around the site. The communal residential amenity comprises the inclusion of a roof garden on Block J (central mansion block) that will be accessible to all residents regardless of tenure. This is complimented by a smaller roof garden space on the shoulder (lower part) of Block K. The office users also benefit from smaller private amenity terraces to Block J and K.
- 4.27 The public realm and landscaping strategy sets out the approach to providing valuable, high quality public and private amenity space, which is central to the proposed development, and that tie in to the Council's wider ambitions for enhancements to the wider area as part of the Paddington Places initiative, and follows TfL's safer places work on the Edgware Road/Harrow Road junction.

- 4.28 The principal new public space is laid out with a linear landscape garden running east-west across Newcastle Place, with green lanes providing new pedestrian routes between the blocks into the site, and a considered mix of soft and hard surfaces. The public realm that borders the site is to be softened with new trees and planting that form a green halo around the site and culminates in the new plaza created on the corner of Edgware Road directly opposite the underground station, creating a sense of arrival to the site.
- 4.29 The main entrance to the whole Masterplan (including both WEG and the PGPS site) is off Edgware Road via Newcastle Place. This entrance is designed for vehicle (drop off and deliveries only) and pedestrian access, however the design of the public realm has been developed with priority way being given to pedestrian and cycle movement through the site. Vehicle movements will only be for drop off and emergency services only. The extent of soft landscaping has been maximised in this area in order to prioritise pedestrian movement.
- 4.30 The southern part of Edgware Road has already been substantially improved as part of phase one of WEG Masterplan which is to be continued with widening of the pavement, the planting of new trees and a water feature along with the opportunity for the retail and cafes to bring ground floor activation to this street frontage.

Public Art

- 4.31 It is proposed to retain an element of the existing public art that features as part of the Police Station building's façade at ground floor along Harrow Road, which is recognised as having local value. It is the intention that parts of this will be integrated into this third phase of the Masterplan and potentially within the pedestrian underpass that connects through to Paddington Basin (location for this is yet to be agreed/determined).

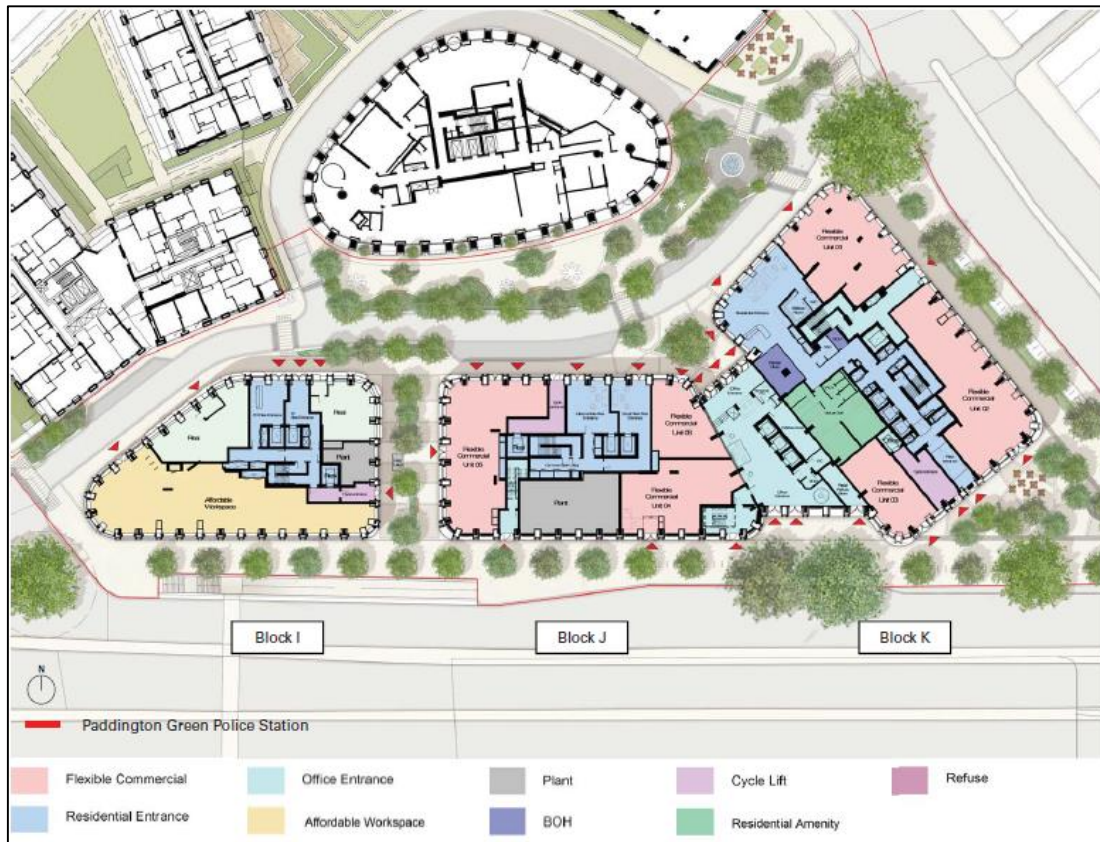
Play space

- 4.32 The Proposed Development includes a total of 1,138sqm of integrated play space provision for children of all age groups (for all tenures). The play space throughout the site is in addition to the space provided as part of phase 1 and 2 of the WEG Masterplan. This is further described in the DAS, and assessed in Section 7 below. There is however a shortfall in provision on site, due to the existing site's constraints, which will be mitigated through a financial contribution. Berkeley are in discussions with Westminster around how this contribution could be deployed in the local area to the benefit of the existing communities.

Commercial uses

- 4.33 The development proposes 7,092 (GIA) of (flexible) non-residential uses falling within Use Class E, which will predominantly comprise significant office space at the first and second floor of Block J and K, with active commercial uses across the ground floor including shops, cafes and other uses.
- 4.34 The commercial uses are proposed at ground, first and second floor levels of Blocks J and K, and at the ground floor of Block I and offer active frontages around the whole site, as shown below in Figure 4.2.

Figure 4.2: Proposed ground floor plan showing commercial floorspace



4.35 Affordable workspace (also within Class E) is provided as part of the proposal, and is located in the ground floor of Block I in a prominent location, and is accessed just off Paddington Green (within the pedestrianized area) , 3 x flexible commercial units are located in block J and 3 x flexible units are located in block K.

4.36 The office entrance is within the link block between Blocks I and J and has dual access from the pedestrianized area (formerly Newcastle Place) and from Harrow Road.

Car and cycle parking

4.37 The scheme has been designed to be a car free development, and as such it is not anticipated that there will be any significant residential car movement through the site. The stopping up of Newcastle Place will only permit controlled vehicular access for limited small scale servicing. The vast majority of servicing will take place through the WEG basement.

4.38 The proposals include 18 accessible car parking spaces as required by the London Plan, which are located within the basement level B1. Access to the car park is via the vehicle ramp which is entered via Church Street, and through the basement of the WEG development.

4.39 The majority of the proposed cycle parking provision is delivered on site in line with the London Plan providing short and long stay cycle parking for the commercial uses at ground floor level and within the basement levels, which is where the resident’s cycle parking is located.

- 4.40 Cycle parking for each residential block is provided in excess of Westminster cycle parking requirements and the majority of the London Plan requirements. However, in order to fully meet the London Plan standards for residential spaces, 10% of these spaces will be placed with the basement of the WEG scheme which is outside of the red line of this application meaning there will be a temporary shortfall of 10% of the residential cycle spaces until this change is secured by amending the WEG scheme, which will be submitted to WCC separately.
- 4.41 Cycle parking is located within secure storage facilities and all are served by a suitable accessible lift, accessed from the ground floor. Short stay spaces are also located in the landscaping at ground floor level, serving the retail and visitors to the office use. The total provision is shown in table 4.2 below.
- 4.42 TfL's position on Class E uses is that they will seek to apply the most stringent cycle parking standards, i.e. those which result in the most cycle parking and the least car parking. On this basis, all ground floor flexible commercial uses are considered to be A2-A5 retail (under former use classes) for a robust case in considering cycle provision.

Table 4.2: Proposed Cycle parking

Use	Short Stay	Long Stay
Residential	15	878
Office /workspace	11	75
Commercial	60	7
Total	86	960

Materials and architectural treatment

- 4.43 Full details and visualisations of the proposed design and materiality can be found within the Design and Access Statement prepared by Square and Partners, and have been selected to reflect local architectural character. The proposed materiality and architectural treatment continues the palate and approach as established on West End Gate and 14-17 Paddington Green, while introducing variety that reflects the context of the PGPS site specifically, and nature of the proposed development.
- 4.44 It has also evolved through the pre-application process, as a key element of refining the tall building and its integration into the wider townscape both individually and as part of a cluster of development in hand with WEG and neighbouring sites. This is set out in full in the accompanying DAS, which sets out the design evolution in detail, and the approach taken to each individual building within the proposals for PGPS.

Sustainability and Energy

- 4.45 An Energy Strategy and a Sustainability Statement have been prepared by WSP and are submitted in support of this application. The main focus of the energy strategy is to connect through to the West End Gate energy centre, which has capacity to serve the

PGPS site. This energy centre has also been future proofed to connect to the wider Church Street District Heating network in future should that come forward. The proposal also includes PV cells, delivering on site renewable energy generation.

- 4.46 More generally the scheme is of a high quality sustainable design, incorporating active and passive measures to ensure the site delivers significant on site carbon reduction, and will be an efficient development going forward using high quality materials and systems to ensure a high quality residential and commercial environment is delivered. Sustainability measures including SUDS, low energy lighting, recycled content where possible, responsible sourcing, rainwater harvesting, green roofs and significant planting and landscaping throughout the site.
- 4.47 All commercial areas of the Proposed Development are expected to achieve as a minimum a BREEAM 'Excellent' rating, and will achieve at least 35% on site carbon reduction, alongside a carbon offset payment to reach a carbon neutral position.
- 4.48 The energy strategy has been structured in accordance with GLA's energy hierarchy: Be Lean, Be Clean, Be Green. The proposals for the scheme have been developed in accordance with the desire to achieve an energy efficient and sustainable development. The Proposed Development will be designed to achieve optimum energy performance, and will incorporate the following design features:
- The building fabric will be designed to significantly exceed the minimum fabric requirements of Part L1A and L2A (2013) of the Building Regulations.
 - Passive design measures will be incorporated into the design to reduce energy demand and the risk of overheating.
 - A high-performance building services solution is proposed for the Proposed Development.
 - 2 No. Air Source Heat Pumps located on the roof of Building I within screened area provide the heating and cooling load to CAT A non-residential areas.
 - Hot water to the non-residential CAT A areas will be provided by the ASHP combined with 2 no. Water Source Heat Pumps (WSHP) located at office floor level.
 - Terminal units are designed to achieve a specific fan power in operation significantly lower than the Part L 2013 limiting SFP.
 - All spaces will include 100% low energy lighting. Occupancy sensing will be specified throughout.
 - 123sqm of PV are proposed on the roof of the three proposed buildings to contribute towards the on-site carbon reduction target of 35% and the overall Zero Carbon Target.

Waste and Servicing

- 4.49 All servicing will take place within the development, ensuring there will be no negative impact on the highways network and local environment. This will be done principally through the proposed connection to the WEG basement (for large scale servicing including waste collection, large scale deliveries), in addition to a small element of on street servicing on Newcastle Place, which is proposed to be stopped up, and will give controlled access to small delivery vehicles alone.
- 4.50 There will be significant on site management of all servicing and delivery activities, including by residential concierge services, and other building management staff during the building's operation.
- 4.51 The proposed development will be provided with three waste storage areas at basement level which are located in close proximity to the service cores of the apartment buildings. These waste storage areas will be used by the residents within each of the apartment blocks.
- 4.52 Estimated residential waste generation levels from the proposed development have been quantified based on weekly waste generation metrics sourced from WCC's planning guidance.
- 4.53 Each residential property will be provided with a segregated waste bin, which will be fixed into an appropriate kitchen unit. The segregated waste bin will contain sufficient individual receptacles to allow the segregation of the waste in accordance with the Guidance.
- 4.54 It is proposed that waste storage areas will be provided at basement level in close proximity to each of the service cores of each Block. These waste storage areas will be the location that all residential refuse, recyclable and food waste generated from the individual blocks will be stored prior to collection.
- 4.55 Residents will be required to transport their own waste from their individual apartments directly to their local waste storage area using the residential passenger lifts in Block I and J.
- 4.56 In Block K, a waste chute has been incorporated due to the distance between the upper residential floors and the refuse stores in the basement of Block K. This replicates the waste management system that is in place in the Westmark tower, adjacent to the site at WEG.
- 4.57 The servicing area acts as a point of contact for refuse delivery. Each residential core has a localised refuse store. On the day of collections the management will relocate the wheelie bins to the holding area for refuse collection.
- 4.58 The refuse storage spaces incorporate policy compliant recycling and waste facilities across the development and waste would be managed in accordance with the Proposed Development's Waste Strategy. Furthermore a Delivery Servicing Plan and Operational Waste Management Plan would be implemented. These measures together with the Applicant's commitment to encourage sustainable waste practices at the Proposed

Development through BREEAM 'Excellent' accreditation would facilitate waste minimisation and recycling at the site.

Relationship to West End Gate Planning Permission

- 4.59 For the avoidance of doubt, the Proposed Development of PGPS relies on elements of the adjacent West End Gate scheme/planning permission for its delivery. As set out in this Planning Statement and in the associated submission documents, these links are:
- A physical connection at basement level between PGPS and WEG for the servicing of PGPS, which will take place in a consolidated way in the WEG basement. Access to the basement for vehicles will continue to be from Church Street as consented for WEG.
 - Connection to the WEG energy centre to provide power to the PGPS development.
 - Provision of additional cycle parking spaces within the WEG basement, to make up the 10% shortfall of provision within the PGPS basement.
- 4.60 In addition, by bringing PGPS into the wider West End Gate Masterplan it provides the opportunity for the public realm and landscaping strategy between WEG and PGPS, namely Newcastle Place to be revisited and enhanced.
- 4.61 These series of linkages and revisions are shown on the submitted plans, and within the supporting application material.
- 4.62 A resultant amendment to the extant, implemented WEG planning permission will be made in due course (prior to commencement of PGPS) to formalise this relationship and linkage, namely to the basement level plans, and to the ground floor plan around Block A and B fronting onto Newcastle Place. Relevant planning conditions relating to landscaping (and others if appropriate) will also be re-discharged for WEG as appropriate, while WEG and PGPS will be linked via legal agreement as appropriate.

5. Pre-application Engagement

- 5.1 The proposed development has been subject to extensive and repeated rounds of public and stakeholder engagement ahead of the submission of the application. This section of the planning statement focuses on engagement with WCC officers, the Greater London Authority, and Transport for London.
- 5.2 The Statement of Community Involvement by Concilio that is submitted with this application sets out details of the two rounds of public consultation that have been undertaken through a range of platforms and engagement techniques to ensure public participation during the Covid-19 pandemic. The consultation strategy has included focused meetings, an online consultation website, webinars, and online feedback forms.
- 5.3 As set out in other parts of this Planning Statement, the redevelopment of Paddington Green Police Station has been envisaged since Berkeley acquired the neighbouring West End Gate site, with PGPS representing phase 3 of the wider WEG Masterplan. This was articulated and set out as a Masterplan vision in the Design and Access Statement to the original West End Gate planning application, which was consented in April 2016. There has been therefore a long standing and publicised intention for the PGPS site to be redeveloped as part of the wider housing led regeneration Masterplan.
- 5.4 Initial discussions were held with WCC on an early concept for the redevelopment of the PGPS site in 2016, however formal discussions commenced with Westminster and the Greater London Authority (GLA) from 2019 onwards as detailed below.

Pre-application round 1 – Spring 2019

- 5.5 Formal pre-application engagement with WCC commenced in Spring 2019, followed by an initial meeting with the Greater London Authority. The scheme presented at that initial pre-application meeting comprised two towers of a similar architectural design to the existing Westmark tower (Block A) at neighbouring West End Gate, creating a cluster of three towers, with significant place making enhancements to Newcastle Place, Harrow Road and Edgware Road.
- 5.6 At lower levels there was a podium extending across the site providing commercial uses including ground floor retail and restaurant uses, community space, offices over the first and second floors, with residential above this. Two different massing options were presented, with a taller option (42 and 36 storeys) delivering 800 new homes including 35% on site affordable housing, or a lower option (28 and 26 storeys) delivering 550 homes including 35% on site affordable housing.

WCC feedback

- The principal of the redevelopment was supported, as was the residential provision including the 35% on site affordable housing provision. Clarification/confirmation was sought in relation to compliance with the Mayor's Affordable Housing SPG in relation to public land and the requirement for a portfolio agreement to be in place, ensuring that 50% affordable housing is delivered. The proposal was considered to be 'fast track' compliant on confirmation of the portfolio arrangement.

- The provision of commercial uses on site was also supported, and the loss of the existing police station/social and community use was highlighted as requiring justification in line with adopted policy.
- Both massing options were considered to be unacceptable in terms of their impact on the townscape, and in the context of draft City Plan policy at the time. The feedback stated that the proposal would need to be considered in light of all relevant considerations and relevant viewpoints.
- More slender tall elements of built form were identified as having the potential to create higher points of interest, and that the footprints of the two towers in this option were excessive and unacceptable.
- In addition, replicating the Westmark tower design was not supported, with variety and variation in architectural approach and façade design supported.
- Further comments were received around the townscape and animation of the ground floor in relation to the plinth/podium approach at the lower levels – and the need to provide more animation to the street scape.
- Substantially reduced car parking on site was supported.

GLA Feedback

- The GLA supported the principal of the high-density mixed use redevelopment of the brownfield site, in the context of the site's location within the Edgware Road Housing Zone, and its (then) allocation in the Westminster City Plan as a strategic site allocated for residential led mixed use development.
- The loss of the police/community use was also accepted given MOPAC's published estate strategy and long held intention to dispose of the site.
- The affordable housing provision was supported on the assumption that the proposal would deliver 35% affordable housing on site, with an agreement in place between the MPS and the Mayor to deliver 50% affordable housing across the portfolio of MPS sites, and as such is considered to be fast track compliant.
- The housing mix and choice was supported, and it was noted that the affordable housing mix should respond to the requirements of supporting the Church Street Estate Regeneration project, which is the intention.
- In design terms, the general layout principles of the site and relationship to WEG were supported, including the new pedestrian routes and public spaces, as was the intention to provide basement level parking and servicing.
- Officers were supportive of the proposed height of the scheme, including the 42 storey tower and second tower of the site, and the location of the taller buildings proposed. Likewise, consideration of the submitted townscape views concluded that the general scale and massing sits comfortably in the wider context, and will landmark the prominent junction and respond to the scale of Paddington Basin and the consented 'Cucumber' at 1 Merchant Square.

- Concern was raised in relation to the perception of bulk and risk of coalescence created. As such it was encouraged that alternative massing that reduced the breadth of building footprints be explored, to provide more slender buildings.
 - Greater architectural variation between buildings was also encouraged, as was an emphasis on residential quality in terms of relevant standards and policy requirements, and meeting accessibility requirements set out in the building regulations.
 - Comments repeated general policy requirements around energy and sustainability.
- 5.7 In summary both the GLA and WCC supported the principle of the residential led mixed-use redevelopment of the site, and its importance in delivering the wider Church Street regeneration. The level of affordable housing proposed was supported, as was the mix of uses proposed. Comments were raised in relation to the architectural approach, with both parties making similar points around the bulk of the two towers, and the need to introduce greater architectural variety. While the GLA fully supported the height proposed in both options, Westminster raised this as an issue of concern.

Pre-application Round 2 – February 2020

- 5.8 Following a period of review and consideration of the pre-application feedback received in 2019, a follow up high level pre-application meeting was held with WCC and the GLA in February 2020, which sought to set out the design response to the pre-application meeting 1 comments, and a direction of travel for the scheme.
- 5.9 A revised approach to delivering the site was presented in response to the feedback received relating to the bulk and footprint size of the two buildings initially presented. The new strategy presented was for a composition of three more slender buildings of varying form, with the tallest, more slender element located on the corner of Edgware Road and Harrow Road, with lower buildings within the site and towards Paddington Green. The proposal retained the plinth across the lower floors, and significant public realm and landscaping works to Newcastle Place and around the site.
- 5.10 The proposal was well received by both WCC and the GLA as a positive response to the comments raised through the first pre-application meeting. This formed the basis for detailed design development, to be presented at the third formal pre-application meeting.

Pre-application Round 3 – August 2020

- 5.11 The third round of pre-application entailed the presentation of the developed design of the revised design approach presented at pre-application meeting 2, as a direct response to the detailed comments received through the first pre-application meeting. Detailed analysis of the surrounding context in terms of existing and emerging building heights, key views, conservation and heritage designations, and key surrounding character areas was revisited and presented, in developing the revised proposals in detail.
- 5.12 The pre-app proposals comprised a greater emphasis on the ground floor and public realm through and around the site, delivering a group of three individual buildings with

new public routes and greater permeability through and between these buildings, in addition to revised and comprehensive landscaping, planting and public realm strategy for Newcastle Place, in addition to Harrow Road and Edgware Road.

- 5.13 The proposal delivered 650 new homes including 40% on site affordable housing as a fast track compliant scheme, while retaining commercial uses at the ground to second floor of the buildings. Each building had a distinct architectural language, while retaining some elements of design consistency with West End Gate, comprising a taller, slender 39 storey building on the corner of Edgware Road and Harrow Road, stepping down to a 25 storey building fronting Paddington Green, with a shorter 14 storey mansion block between the two.
- 5.14 This proposal also formed the basis of the first round of public consultation, and was also used in briefing Ward Councillors, local residents associations and amenity societies and other key local stakeholders. The feedback to this initial public consultation is set out in the Statement of Community Involvement submitted with this application.

GLA Comments

- GLA re-asserted their strong support for the principle of the residential-led redevelopment of the site, and acceptance of the loss of the police station use.
- The affordable housing position was supported in terms of the 40% on site provision and wider portfolio agreement across the MPS portfolio of sites. It was confirmed that the scheme was eligible for the fast track route, subject to confirmation on the tenure split.
- In design terms, the optimisation of the site within the CAZ is strongly supported, and that the redesign of the towers goes some way to address previously raised concerns with regard to coalescence and skyline composition in most views.
- No strategic concern was raised in relation to the principle and location of height as presented.
- Officers welcomed the greater variation in the architectural approach to the buildings, and advocated the exploration of other and more varied treatment options to achieve greater differentiation between towers.
- The basement level servicing was supported, and the knock on ability to then improve the public realm, and connection to West End Gate.

WCC Comments

- Officers continued to raise concern with the massing of the two taller elements, namely the tall building on the corner of Edgware Road and Harrow Road, and the 'flatiron' building on the Paddington Green side of the site.
- Comments were received in the context of the City Council's emerging City Plan and policy on building heights. The Draft Plan (at the time) identified the site as a Key Development Site for residential led mixed use development. The plan also identified the site as being suitable for the location of a tall, slender building, while

setting out contextual building heights for the surrounding area around the wider Edgware Road/Harrow Road junction.

- Given the stage of policy development and lack of weight in decision making, officers advised that the design should be focused on informing the design through analysis of townscape impact.
- Further comments were received on the design of Newcastle Place, building lines and further work to break up the massing of the buildings, in addition to the desire to explore the retention and potential re-use of some of the decorative panels on the Edgware Road frontage of the existing building.

Pre-Application Round 4 – November/December 2020

- 5.15 Following the comments received from WCC, and through the first round of public consultation, a further revised scheme was presented to officers at the end of 2020. This proposal retained and built on the design principals established through the third round of pre-application engagement, but also made some fundamental revisions.
- 5.16 The proposals retained and further refined the approach to having three distinct but related buildings across the site, with ground floor penetration between all blocks to deliver a pedestrian focused ground floor based on delivering permeability and a variety of connections through the site through to Newcastle Place and Paddington Green. The diversity of commercial uses at the ground, first and second floors remains, including offices, retail and restaurant uses alongside community focused affordable workspace.
- 5.17 The height of the buildings has been significantly reduced from the previous round of consultation, after several different massing scenarios were tested, using neighbouring Westmark (tower A within WEG) as a key point of reference in townscape and views analysis.
- 5.18 The proposal at this stage now included a tall, slender building of up to 32 storeys (with a stepped shoulder of 25 storeys) on the corner of Edgware Road and Harrow Road, a central mansion block of 15 storeys, and a reduced 'flatiron' building of 18 storeys fronting Paddington Green. Further design work was undertaken around the potential to introduce further setbacks to the Paddington Green flatiron building, however these were not considered to be successful in design or townscape terms.
- 5.19 The revised proposal set out at this round of pre-application engagement delivered circa 520 homes including 37% on site affordable housing. Discussions were also progressing with the GLA around the wider MOPAC portfolio agreement, and the potential for Westminster residents and workers to have access to the off-site affordable housing being delivered by MOPAC.

GLA Feedback

- Massing remains supported, concern was never about height, more about the coalescence with the existing West End Gate tower. Interventions and the re-alignment of blocks has successfully removed a lot of this concern.
- The facades are very high quality and have a positive impact on the townscape. Consider further variation between the facades of the three buildings. Very

positive response to the flatiron building on Paddington Green, and is successful in the longer views.

- The view from Little Venice no longer shows issues of coalescence of massing, with more daylight showing between the blocks.
- Discussion was had around the off-site affordable housing provision and portfolio agreement with MOPAC.

WCC Feedback

- Considered that this massing arrangement is more successful in addressing previous concerns than other options presented.
- The stopping up of Newcastle Place was discussed, with further analysis and detail to be provided. The landscape and public realm was welcomed as being of very high quality.
- The affordable housing provision was discussed, albeit in the context of separate meetings that have taken place with WCC's affordable housing manager around the required/preferred mix on site. The wider portfolio agreement was also discussed, in terms of the ability for Westminster workers or residents to have access to the additional affordable housing being provided off-site by MOPAC. An agreement in draft form has been developed for this provision, and it was considered that this offer had become stronger.
- The architecture and facades were considered to be of high quality, with some discussion around the termination or 'top' of the tall building and whether it is defined enough.
- The first round of public consultation was also discussed in terms of the key points raised by respondents, as set out in the Statement of Community Involvement.

Pre-Application Round 5 – February 2021

5.20 A further refined version of the reduced height scheme was presented to officers in February 2021, and also formed the basis of the second round of public consultation undertaken from late February onwards, as detailed in the Statement of Community Involvement by Concilio.

5.21 Officers confirmed the proposed viewpoints selected for the Townscape and Visual Impact Assessment, and provided no further comments on the proposed building heights, highways aspects, sustainability and energy, given comments already provided. Key WCC officer comments included:

- Confirmation that the loss of the Police Station is acceptable in policy terms.
- Reiterated support for the provision of significant new residential, and for the affordable housing provision on site and fast track route in line with GLA policy, in hand with the portfolio agreement in place between the Mayor and MOPAC, of which further details have been requested as part of this application.

- Officers commented on the proposed housing mix, supporting the proportion of studio units, but raising that the proportion of family sized homes falls slightly short of Westminster's strategic target, while there are also some oversized units.
- Housing quality comments confirmed that all flats meet London Plan space standards for internal space, private amenity space, and access to communal amenity space (including for residents of the affordable housing). Comments were raised with regard to the proportion of dual-aspect units and single aspect units, with further information required around ventilation, daylight and privacy of these units in particular.
- The provision of Class E floor space is supported by officers, as is the provision of affordable workspace in the scheme.
- Daylight and sunlight comments were provided in terms of what measures should be used in presenting information in the planning application, and acknowledgement that the scale of the proposals is likely to lead to some significant impacts on neighbouring buildings, including on WEG.
- Comments in relation to the public realm improvements were supportive of the proposed approach to Newcastle Place, the Harrow Road underpass, and the Edgware Road junction. Further engagement with Westminster officers is continuing ahead of submission, to ensure proposals tie in with the Council's wider vision for the stretch between the Edgware Road junction and the Travis Perkins building in Paddington.
- The waste strategy was generally supported in terms of the quantity and nature of waste and recycling storage proposed, with further information requested on the swept path analysis, while the proposed waste chute in Block K was not supported. Further discussions are being held with the waste team on this point.
- In relation to noise and air quality, the proposed use of NOx filters was supported and comments were received in relation to assessment and submission requirements.

Pre-application round 6 – March 2021

5.22 Formal written advice was received on 15th February from WCC, with a follow up meeting to discuss/ clarify the points raised, which was held on 1st March, where further minor design revisions were tabled. Officer comments included the following observations:

- Reiterated acceptance of the loss of the police station.
- Residential provision supported, as is the affordable housing provision and the tenure mix proposed.
- The unit mix as a whole was not supported due to under-provision of family sized housing (22% against 25% policy target), and that the large penthouse units were not supported and should be revised to be under 200 sqm.

- The housing quality proposed was supported, with further information requested on the proportion and nature of single aspect units.
- The provision of offices and active ground floor uses was supported, as is the affordable workspace.
- Comments were received in relation to daylight and sunlight, which acknowledged there will likely be losses to neighbouring buildings, including to Berkeley's adjacent West End Gate site.
- That the proposals represent less than substantial harm to certain identified heritage assets.
- Placeshaping comments were received in relation to the proposals for Newcastle Place, the underpass to Paddington, and the Edgware Road Junction, where all works are generally supported.
- Waste strategy comments were also received, which included push back on the inclusion of a waste chute within block K.
- Noise and air quality comments focussed on the positive incorporation of mitigation measures.
- Comments were also received in relation to public consultation and querying the extent and nature of comments received to date.

5.23 Following on from this, a number of minor revisions were subsequently presented to WCC as a positive response to the comments above. This includes revisions to the proposed unit mix to provide 25% family sized homes, and to reduce the size of the penthouse units to be under 200sqm. Further discussions have also been held around the stopping up of Newcastle Place, the waste chute, the associated landscaping strategy, and in relation to potential planning obligations.

Further pre-application meetings

5.24 At various relevant stages, further more focused meetings have taken place with officers on specific topics or areas of the scheme, including the following:

- **WCC's Affordable Housing Team** – Discussions focused around the level of on-site affordable housing, and specifically the tenure and unit mix that will be delivered, and other considerations such as wheelchair accessible units. The proposals have been developed based on this feedback received, with a view to further supporting and facilitating the decant of tenants from the neighbouring Church Street regeneration area. The proposed tenure mix is supported in line with new Westminster Policy, and the 'fast track' nature of the proposal was confirmed by officers.

In addition, extensive discussions were held around the wider portfolio agreement between the Mayor and MOPAC, the off-site affordable housing provision to deliver 50% affordable housing in total, and nomination rights for Westminster workers and residents for the off-site provision/proportion. The proposed nomination rights are supported by officers, and acknowledged to be an additional public benefit.

- **Transport for London** – A focused pre-application meeting was undertaken with discussion around car and cycle parking, access, servicing, highways and movement around the site generally, healthy streets, application requirements and other relevant considerations.
 - **Historic England** – HE have been briefed prior to submission, and any feedback/comments are awaited.
 - **GLA Energy Team** – Feedback received on the energy strategy proposed (which is to link to the existing energy centre at West End Gate), decarbonisation in the longer term, and application submission requirements among other matters.
 - **WCC Place Shaping Team** – Discussion over the public realm and highways works, and specifically the improvements to the Edgware Road/Harrow Road junction, the pedestrian underpasses and other considerations.
 - **WCC construction Logistics and TfL** - Discussion with the construction officer regarding likely access and egress for demolition and construction of site, road closures, welfare locations and other general logistical discussions.
 - **WCC highways** – As above, discussions regarding the stopping up of Newcastle Place have been held with Westminster on several occasions, setting out the justification and benefit to Westminster for doing so from a maintenance and cost perspective. This is balanced against the usage of Newcastle Place and the impact on the wider highways network, primarily to Church Street. This is set out in the Transport Assessment forming part of this application.
- 5.25 As set out in other parts of this statement, the wider stakeholder and public consultation process, including the activities and meetings undertaken, and detail of responses received in relation to the proposals is set out in an associated Statement of Community Engagement, undertaken by Concilio as part of the application.
- 5.26 The wider engagement process has included several rounds of focused meetings with recognised resident and amenity groups, meetings with Ward Councillors, webinar presentations, a live website with rolling/live response functions including a questionnaire and response form for ongoing feedback to be lodged, alongside promotion and advertising of the consultation through social media including Facebook, Twitter and LinkedIn.

6. Planning Policy Context

- 6.1 This chapter sets out the relevant planning policy context against which the proposals for the site will be assessed.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. This section sets out the relevant Development Plan and other material considerations that are relevant to the site and the Proposed Development.
- 6.3 The Development Plan framework is currently in flux, with the New London Plan having been adopted in March 2021, and Westminster's new City Plan also being very close to adoption following receipt of the Inspector's final report in March 2021. All of this has been taken into consideration in assessing the proposals.

The relevant Development Plan

- 6.4 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the development plan unless material considerations indicate otherwise. The development plan for Westminster consists of:
- The London Plan (March 2021)
 - Westminster City Plan 2019 - 2040 (Intend to Adopt version March 2021, updated post-examination in public, expected to be adopted April / May 2021). Referred to in this document predominantly as 'Draft Westminster City Plan'
 - Westminster Proposals map (Intend to Adopt Version March 2021 – updated post-examination in public, expected to be adopted April/May 2021)
 - Westminster City Plan and associated Proposals Map – adopted November 2016.
 - Westminster's Unitary Development Plan saved policies, adopted January 2007 (saved policies 2010).

Status of Westminster Draft City Plan

- 6.1 Westminster has been in the process of revising its City Plan for several years now, which culminated in the Examination in Public, which took place in late summer/autumn 2020. Following an initial report by the Inspectors, Westminster have consulted on post-EIP revisions required by the Inspector's in their initial report.
- 6.2 Following the completion of the consultation exercise in January 2021, the Inspectors have now issued their final report (dated Friday 19th March), which finds the plan to be sound, meaning Westminster can now adopt the plan at their next full Council meeting, which is expected to take place in April 2021, after this planning application is submitted.
- 6.3 The City Council has subsequently published the 'Intend to Adopt' version in late March 2021, which is referred to throughout this document as either the 'Intend to Publish City

Plan' or the 'Draft Westminster City Plan'. Likewise, in the ES and supporting documents, reference is made to the post-EIP main modifications version of the City Plan (December 2020), which contains the same policy numbering and text as the Intend to Publish version of the City Plan.

- 6.4 The advanced stage of the Westminster City Plan 2019-2040, in line with the provisions set out in Paragraph 48 of the NPPF, means that its policies and requirements now carry weight in decision-making at the time of submission of this application, as set out in a statement by the City Council on receipt of the Inspector's Report.
- 6.5 As such, the Westminster City Plan is considered as if its (current) policies form part of the Development Plan for the purposes of this Planning Statement, but the main thrust of the policy analysis is made in relation to the emerging policies within the Intend to Publish City Plan given its updated status as of 19th March 2021 when the Inspector's Report was received. The adoption of the Intend to Publish City Plan is expected to be adopted by WCC Full Council for adoption on 12 May 2021 which will be during the determination of this application.

Material considerations

- 6.6 In addition, national policy and guidance consists of:
- The National Planning Policy Framework (NPPF), updated and adopted July 2019.
 - National Planning Practice Guidance (July 2019).
- 6.7 The NPPF contains the golden thread of the presumption in favour of sustainable development, both in terms of plan making and decision making.
- 6.8 Key changes to the NPPF adopted in 2019 revolve around calculating housing need and housing land supply methodology. Key focuses of the NPPF continue to be around supporting housing delivery and the provision of affordable housing, with an expectation for delivery to be on site (Chapter 5).
- 6.9 A key element of the NPPF is making effective use of land, including brownfield land and under-utilised land and buildings (Chapter 11).
- 6.10 Further chapters of the NPPF aim to build a strong and competitive economy (Chapter 6), and also to ensure the vitality of town centres (Chapter 7), taking a positive approach to their growth, management and adaptation.

Westminster Supplementary Planning Guidance / Documents

- 6.11 Westminster has also set out its intention to publish and develop a number of Supplementary Planning Documents (SPD's) and Development Plan Documents (DPD's), including a Site Allocations DPD's), Planning Obligations and Affordable Housing DPD and others in 2021. This will follow the adoption of the new City Plan however, and in all cases will involve a period of statutory consultation prior to adoption. These will be monitored during the course of determination.

GLA Supplementary Planning Guidance / Documents

6.12 The following guidance documents are also material considerations for the proposal:

- Mayor of London's Housing SPG (2016).
- Mayor of London's Affordable Housing and Development Viability SPG (2017).
- Mayor of London CAZ SPG (March 2016).
- Mayor of London Accessible London SPG (October 2014).
- Mayor of London Social Infrastructure SPG (May 2015).
- Mayor of London Sustainable Design and Construction (April 2014).
- Mayor of London Play and Informal Recreation (September 2012).
- Paddington Green Conservation Area Audit, and other relevant CA Audits.

6.13 A number of Mayoral SPG's are being developed in support the new London Plan (consultation ended January 21) but are yet to be adopted, including:

- Good Quality Homes for all Londoners
- Circular Economy Statements
- The Public London Charter
- Whole life-cycle Carbon Assessments
- 'Be Seen' Energy Monitoring Guidance

Other Mayoral guidance includes

- Energy Planning Guidance (April 2020)
- Fire Safety (July 2020)

Site designations

6.14 The site falls under the following Local Plan spatial policy designations, as illustrated below on Westminster's adopted proposals map (2016):

Figure 6.1: Proposals map extract (adopted City Plan 2016)



- Central Activities Zone (Marylebone and Fitzrovia area – light pink shaded area)
- North Westminster Economic Development Area (yellow shaded)

- Area of Special Archaeological Priority (Paddington & Lilestone) (black squared line)
- GLA roads – Marylebone Road, Edgware Road
- London Distributor Road – Harrow Road
- Area of Wildlife Deficiency (brown squared line)

6.15 The site falls under the following Local Plan spatial policy designations in the Intend to Publish City Plan, as illustrated below on Westminster’s Draft Proposals Map (Intend to Publish version 2021):

- Central Activities Zone (orange line)
- Church Street Housing Renewal Area (blue hatched line)
- Area of Nature Deficiency (brown squared line)
- Westminster Strategic Road Network (Marylebone Road)
- TFL Strategic Road Network (Edgware Road)

Figure 1.1 Proposals map extract from New City Plan 2019 – 2040 (Intend to Publish, March 2021)



Consultation on proposed revisions to the NPPF (2020)

6.16 On 30 January 2020, the Ministry of Housing, Communities & Local Government (MCHLG) issued a consultation on changes to the NPPF to place greater emphasis on beauty and place-making, which is yet to be adopted. The text is being revised to implement policy changes in response to the Building Better Building Beautiful Commission “Living with Beauty” report. Some notable changes include:

- Changing the overarching social objective of the planning system to include the fostering of *“well-designed, beautiful and safe places”*, where previously it required *“a well-designed and safe built environment”*.
- Introducing a new test that development should be well-designed (paragraph 133), which says that *“development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes”*.
- Paragraph 133 also says that: *“Conversely, significant weight should be given to: development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes; and/or outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”*.

Relevant adopted London Plan and Westminster Policies

London Plan 2021

- Policy GG1 - Building strong and inclusive communities
- Policy GG2 - Making the best use of land
- Policy GG3 - Creating a healthy city
- Policy GG4 - Delivering the homes Londoners need
- Policy GG5 - Growing a good economy
- Policy GG6 - Increasing efficiency and resilience
- Policy SD4 - The Central Activities Zone (CAZ)
- Policy SD5 - Offices, other strategic functions and residential development in the CAZ
- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D6 - Housing quality and standards
- Policy D7 - Accessible housing
- Policy D8 - Public realm
- Policy D9 - Tall buildings
- Policy D10 - Basement development
- Policy D12 - Fire safety
- Policy D13 - Agent of Change
- Policy D14 - Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H10 - Housing size mix
- Policy S1 - Developing London’s social infrastructure
- Policy S4 - Play and informal recreation
- Policy E1 - Offices
- Policy E2 - Providing suitable business space

- Policy E9 - Retail, markets and hot food takeaways
- Policy HC1 – Heritage conservation and growth
- Policy HC3 - Strategic and Local Views
- Policy HC4 - London View Management Framework
- Policy HC6 - Supporting the night-time economy
- Policy G1 - Green infrastructure
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 – Biodiversity and access to nature
- Policy G7 – Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 – Minimising greenhouse gas emissions
- Policy SI 3 – Energy Infrastructure
- Policy SI 4 – Managing heat risk
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 13 - Sustainable drainage
- Policy T2 - Healthy Streets
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 - Residential parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning

Westminster City Plan (March 2019 - 2040) – Intend to Publish Version, March 2021

- Policy 1 - Westminster’s spatial strategy
- Policy 6 - Spatial Development Priorities: Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas
- Policy 7 - Managing development for Westminster’s people
- Policy 8 - Housing Delivery
- Policy 9 - Affordable housing
- Policy 10 - Housing for specific groups
- Policy 12 - Housing quality
- Policy 13 - Supporting economic growth
- Policy 14 - Town centres, high streets and the CAZ
- Policy 16 - Food, drink and entertainment
- Policy 17 - Community infrastructure and facilities
- Policy 24 - Sustainable transport
- Policy 25 - Walking and cycling
- Policy 26 - Public transport and infrastructure
- Policy 27 - Parking
- Policy 28 - Highway access and management
- Policy 29 – Freight and servicing
- Policy 30 - Technological innovation in transport
- Policy 32 - Air quality

- Policy 33 - Local environmental impacts
- Policy 34 - Green infrastructure
- Policy 36 - Energy
- Policy 37 - Waste management
- Policy 38 - Design principles
- Policy 39 – Westminster’s Heritage
- Policy 40 - Townscape and architecture
- Policy 41 - Building height
- Policy 42 - Building height in the housing renewal areas
- Policy 43 - Public realm
- Policy 44 - Security measures in the public realm
- Policy 45 - Basement developments

6.17 As set out earlier in this section, the planning policy considerations/analysis section below will also refer to the currently adopted City Plan (November 2016) and Unitary Development Plan (saved 2010), being the adopted Development Plan for Westminster at the time of submission of this application.

7. Planning Policy Considerations

7.1 This section assesses the Proposed Development against overriding themes of planning policy at national, regional and local level as well as other relevant material considerations in terms of the key issues pertinent to this application, namely:

- Principle of Redevelopment
 - Loss of Existing Police Station Use
 - Principle of Residential Use and Contribution to Housing Delivery
 - Principal of Office Use
 - Principle of flexible commercial space (Class E)
- Affordable Housing Provision
 - Tenure Split and Unit Mix
 - Off-site affordable housing
- Housing Mix
- Residential Density
- Residential quality
- Design and architecture
- Tall Buildings
- Built Heritage Townscape Visual Impact Assessment
- Wind and Microclimate
- Daylight and Sunlight
- Statement of Community Involvement
- Landscaping
 - Urban Greening and Biodiversity
- Amenity space and playspace
- Street furniture
- Sustainability
- Energy
- Transport Assessment
 - Healthy Streets approach
 - Car parking
 - Cycle parking
 - Public transport
 - Vehicular access
 - Stopping up Newcastle Place
 - TfL safer junction scheme
 - Relevant WEG consents
 - Healthy Streets checklist
 - Delivery and servicing
 - Construction access and vehicles

Principle of redevelopment

7.2 At the heart of the National Planning Policy Framework and National Planning Practice Guidance is the presumption in favour of sustainable development (Paragraph 11, NPPF) which states that consent should be granted 'without delay' where proposals accord with the Development Plan. Furthermore, the NPPF states that planning policies and

decisions should *'promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'* (Paragraph 117).

- 7.3 The proposals for this third phase of the West End Gate Masterplan meet key strategic objectives around place making in this part of the city, housing delivery and economic development, in line with aspirations set out for this site of strategic importance for the delivery of Westminster's City Plan.
- 7.4 The principle of the residential led redevelopment of the site is accepted and strongly supported by Westminster and the Mayor of London as established through the formal pre-application process. The loss of the previous Police Station function has also been accepted by Westminster and the GLA, given the decommissioning of the station and its disposal as part of MOPAC's wider estate strategy, which is further detailed below. The disposal of this surplus site to Berkeley ensures that the re-purposing of the site will be a swift process, ensuring that the future use will make a significant and positive contribution to the local area and Westminster more generally.
- 7.5 The site is located in a unique and pivotal location for the delivery of strategic priorities, being located in the Central Activities Zone, being identified as a key development site in the housing trajectory, and being within the Church Street / Edgware Road Housing Renewal Area and the Edgware Road Housing Zone.
- 7.6 The site is in a heavily developed area of central London with excellent access to public transport and services. The existing buildings, which are proposed to be demolished, have been largely vacated by the Metropolitan Police since 2018, now only being occupied by a small element of lawful office use (refer to Planning History section). The site is therefore considered to be a severely underutilised key brownfield site, suitable for high density mixed use development in accordance with Policy GG2 'Making the best use of land' of the London Plan, Policy S1 'Mixed Use In The Central Activities Zone' of the 2016 City Plan and Policy 1 'Westminster's spatial strategy' of Westminster City Plan.
- 7.7 The demolition of the existing buildings have been found to be acceptable to officers in order to comprehensively redevelop the site. The proposals which represent a range of uses and quantum of development will greatly assist with Westminster's strategic and spatial priorities through the delivery of significant amounts of high quality housing of a range and type that meets local housing need, including affordable housing.

Loss of Existing Police Station Use

- 7.8 As stated above, the site has been identified as a key housing delivery site as part of Westminster's housing trajectory, illustrating its suitable location for redevelopment and potential to contribute significantly to the delivery of much needed residential housing.
- 7.9 As set out earlier in this statement, and in the Design and Access Statement and existing plans, the existing site was completed in 1971 and from this time has housed a unique mix of uses not typical to a standard police station. This reflects the unique function of the station, which served as the most important high-security station in the UK, in addition to housing emergency response teams covering Westminster and wider

boroughs, a front of house station presence, and a number of desk based administrative and specialist policing services (e.g. road traffic incident team, forensic services administrative functions etc).

- 7.10 As is public knowledge, the station housed specialist custody cells for potential and known terrorism suspects. It therefore had a much wider function beyond being a front of house neighbourhood police station. In land use terms, it is considered by Westminster to be a Sui Generis use, having housed the front of house police station and associated policing functions, a majority of which were desk based, reflecting the office fit out of much of the site, alongside the accommodation/section house building. The 'Annex' part of the site at the western end is lawfully occupied Class E office space, following a change of use application consented recently on behalf of the applicant (refer to Planning History section).
- 7.11 More fundamentally, the site has been decommissioned and disposed of as part of the MOPAC's estate strategy. The Police & Crime Plan 2017-2021 commits to investment in the tools that police officers need to do their jobs, and invest in core buildings to create a modern environment for staff and the public.
- 7.12 In support of that objective, the disposal of surplus properties is set out to generate capital receipts in support of the wider capital programme. A number of properties were identified for disposal in 2018/2019, which included the Paddington Green Police Station. This is documented in publically available papers and reports through the GLA and MOPAC websites.
- 7.13 As part of the disposal of PGPS, the front counter and Dedicated Ward Officers located at Paddington Green were re-located to a new facility on adjacent Church Street by June 2018. At this point, PGPS contained no public facing functions and the building was effectively vacated. From that point until the exchange/sale of the building to Berkeley in 2020, the MET Police used the site sporadically for parking and logistical functions in support of significant events policing, firearms training and other ad hoc activities.
- 7.14 Planning permission was granted in December 2017 under application ref. 17/07447/FULL for the creation of a Neighbourhood Policing Hub (Sui Generis Use Class) at 80A and 88 Church Street, a short distance from the existing Paddington Green Police Station. As such this local policing function has not been lost from the local area. This counter service opened in the summer of 2018, relocating the operational front counter from Paddington Green to this new location, ensuring this valuable social and community use was re-provided in the direct vicinity of its previous location, in a more fit for purpose bespoke facility at the heart of the neighbourhood's main commercial shopping centre on Church Street.
- 7.15 The other functions previously housed at Paddington Green were relocated to other parts of the Metropolitan Police Estate. Many of the services had a pan-London focus or function, and did not just serve the City of Westminster. This was the case for the section house accommodation (alternative accommodation is available at the Gilmore Section House in Kennington), the pan-London and national services including the Territorial Support Group, the Road Traffic Investigation Unit, and other general administrative and management functions – which relocated to appropriate space in other police stations and office buildings across the Metropolitan Police Estate.

- 7.16 None of these services have been lost, and they continue to function and serve the City as they previously did when they were housed at Paddington Green. the relocation and consolidation of these functions was as part of the Metropolitan Police’s established estate strategy and the proposed redevelopment is a response to this wider decision
- 7.17 Policy 17 of the New Westminster City Plan seeks to protect existing community facilities and floorspace other than where it can be demonstrated that the loss or relocation is necessary to enable service provision to be reconfigured, consolidated, upgraded, or delivered more effectively as part of a published strategy to improve services and meet identified needs. This requirement is clearly met as set out above, with the loss of the Police Station being enshrined in the wider MOPAC estate strategy, in hand with the relocation of all existing functions to either neighbouring sites in Church Street or across the wider London portfolio, which is in fitting with the London-wide catchment of many of the services previously housed at PGPS.
- 7.18 This policy approach is also encapsulated in the London Plan under policy S1 Developing London’s social infrastructure, specifically part F, which refers to re-provision of social uses and loss as a part of a wider published estate strategy.
- 7.19 In addition the proposal is considered to be in accordance with adopted Local Plan Policy S34 Social and Community Infrastructure, which contains many of the same provisions as the new policy 17. The existing site does not lend itself to re-use without redevelopment, given its purpose built, high security nature, and would also require a change of use given the Sui Generis nature of much of the site. The development proposal also includes a new community use in the shape of new affordable workspace for the local community.

Principle of Residential Use and Contribution to Housing Delivery

- 7.20 There is a clear policy requirement at a national, regional and local level to provide new housing. The NPPF states that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. This is to support the Government’s objective of significantly boosting the supply of homes.
- 7.21 London Plan Policy H1 ‘Increasing housing supply’ seeks to increase the supply of housing and sets the ten-year target for Westminster (within Table 4.1) at 9,850 homes. The policy requires sites with the potential for housing delivery to be optimised, especially those that are very well connected, and the redevelopment of surplus public sector owned sites, such as the PGPS site.
- 7.22 Policy GG2 of the London Plan seeks to create successful sustainable mixed-use places that make the best use of land. The policy sets out for appropriate land to be proactively intensified to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 7.23 The provision of residential accommodation is strongly supported by policy S14 of the City Plan (2016), and policy S8 Housing Delivery in the Intend to Publish City Plan, which

seeks to increase the supply of good quality housing to meet Westminster's housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs.

- 7.24 With the site being within the Church Street / Edgware Road Housing Renewal Area, the proposed 550 new homes will greatly assist in meeting Intend to Publish Policy 6 'Spatial Development Priorities: Church Street / Edgware Road' ambitions of creating at least 2,000 high quality new homes in this area, as well as meeting the objectives of Policy 8 'Housing delivery' which seeks to exceed the London Plan target and create 20,685 new homes in the borough by 2040 (now reduced to 9,850 over the new London Plan ten year period, or an annual target of 985 new homes per year).
- 7.25 The site is very well located in terms of public transport and amenities. A key planning benefit of the redevelopment of this site is that it intensifies the use of land to support the delivery of a strategically significant quantum of new homes, office space and retail space and promotes higher density development. The proposals would deliver 556 new homes, which is a significant contribution to the above housing targets, representing 56% of a single year of housing delivery in Westminster, and 5.6% of the ten year target through this single site, making it of strategic importance.
- 7.26 Delivery of this scale in Westminster is very rare, particularly when led by the private sector in recent times. A majority of the sites that are earmarked for significant housing delivery in Westminster are Council owned sites within the identified Housing Renewal Areas, or relate to public sector land. As such, PGPS is unique in terms of its scale of delivery, as WEG has been before it.

Principle of Office Use

- 7.27 It is proposed for 4,755sqm (GIA) of office space to be located on the first and second floor of Blocks J and K which are linked for an open plan design, providing flexibility for the future use and occupation. It should be noted that the existing site includes 1300 sqm of lawful office space (Class E) at the Western end of the site, which is protected under existing and draft Local Plan policy under policy 13 "Supporting economic growth", and was supported in the recent planning application consented in December 2020.
- 7.28 The proposed new high quality, flexible and adaptable office space to be located within a mixed use development within the CAZ is supported by London Plan Policy GG5 'Growing a good economy', SD4 'The Central Activities Zone (CAZ)', SD5 'Offices, other strategic functions and residential development in the CAZ' and E1 'Offices'.
- 7.29 The creation of additional jobs and employment opportunities within the CAZ is further supported by Policy 1 'Westminster's spatial strategy' and Policy 6 'Spatial Development Priorities: Church Street / Edgware Road'. The additional new jobs that will be created within this part of the CAZ will also help towards the 63,000 new jobs ambition set out within Policy 13 'Supporting economic growth' of the Draft City Plan (2040), and also under adopted City Plan policies S1 Mixed Use in the CAZ, S12 North Westminster Economic Development Area, S18 Commercial Development, and S20 Offices.

- 7.30 328sqm (GIA) of affordable workspace is also being provided within the ground floor of Block I for local start-ups and small businesses in accordance with London Plan Policy E3 'Affordable workspace' and Policy 13C of the City Plan. This space can also be used by local SME / start-up businesses in the area in accordance with London Plan Policy E2 'Providing suitable business space'. This space will be provided at a discounted market rate as required in London Plan policy, to be specified through the S106 agreement.
- 7.31 This new workspace area, located with an active frontage just off Paddington Green and along Harrow Road can also be used as a community facility in accordance with Policy 6 'Church Street / Edgware Road Renewal Area' and Policy 17 'Community infrastructure and facilities' of the Draft City Plan.

Principle of flexible commercial space (Class E)

- 7.32 1,088sqm (GIA) of flexible commercial space is proposed at ground floor within Block J and K. This will be through the delivery of 6 x flexible commercial units of varying sizes, all of which will fall within Use Class E.
- 7.33 The flexible nature of these units will also accommodate a range of diverse units which are appropriate to the area in accordance with Policy E9 'Retail, markets and hot food takeaways' of the London Plan and policy 16 'Food, drink and entertainment' of the City Plan, and is also in accordance with established policy in the adopted City Plan under Policy S1 Mixed Use in the CAZ.
- 7.34 This additional commercial floorspace within the CAZ, all of different sizes and all having active ground floor frontages on all elevations which will serve the local community is supported within Local Plan Policy 14 'Town centres, high streets and the CAZ', while creating additional employment opportunities.
- 7.35 Use Class 'E' supports a range of uses however, it is proposed for the use of the ground floor flexible commercial units to include retail, café/restaurants, offices and professional services open to visiting members of the public where appropriate. It is agreed (as per the consented change of use to office application relating to the annex part of the site) that some of the uses falling within Class E would not be suitable in this location namely crèche, day nursery, day centre or large supermarket. These could have negative impacts on the site and surrounding area and should be excluded from being permitted within this area. This can be secured via an appropriately worded condition.
- 7.36 The inclusion of additional E-class units will complement the town centre uses being delivered along Edgware Road as part of the West End Gate development, and complement the adjacent Church Street/Edgware Road District Shopping Centre. The proposed units will provide ground floor activity, drawing people into and through the PGPS site, creating job opportunities and providing local services in line with the policies set out above.

Affordable Housing Provision

- 7.37 The Proposed Development will make a significant contribution to affordable housing delivery and addressing housing need, in line with the ambitions of the London Plan and Westminster's City Plan. The applicant proposes to deliver 38% of units (210 units) (37%

by habitable room) on site as affordable housing in order to create a mixed and inclusive community and address local housing need, as supported by Policy GG4 'Delivering the homes Londoners need' and GG5 'Growing a good economy' of the London Plan.

- 7.38 The proposed development delivers a range of unit typologies in which 38% of these are affordable by unit, which exceeds the 35% target (by all relevant metrics - unit, habitable room, and floor space) as set out in Policy H5 'Threshold approach to applications' of the London Plan and Policy 9 'Affordable housing' of the Draft Westminster City Plan.
- 7.39 Officers have confirmed that the Proposed Development qualifies for the 'Fast Track Route' as set out in the London Plan threshold approach to applications under policy H5, and elaborated on in the associated Affordable Housing and Viability SPG (2017). The London Plan Policy (H5) requires public sector land to achieve 50% affordable housing, however there are additional provisions where there is an established portfolio agreement between the public sector body and the Mayor. This is the case for MOPAC, who have an established portfolio agreement with the Mayor, which will ensure they deliver 50% affordable housing across the portfolio as a minimum.
- 7.40 With MOPAC's established portfolio agreement in place with the Mayor, policy then states that the 35% threshold then applies to individual sites within the portfolio as set out in Policy H5, the associated SPG, and the supporting text to Policy H5. As such, the Proposed Development is fully compliant with the new London Plan and Westminster's adopted and emerging City Plan with regards to the quantum of on-site affordable housing being proposed, which is in fact in excess of the 35% threshold, standing at 38% on site provision, and providing a significant public benefit.

Affordable Tenure Split and Unit Mix

- 7.41 It is proposed for 60% of the affordable units to be intermediate and 40% to be social rented, which again accords with the planning policy provisions set out in Policy H6 'Affordable housing tenure' of the London Plan and meets Part E of Policy 9 'Affordable housing' of the Draft City Plan.
- 7.42 The mix has been developed in close consultation with Westminster's affordable housing team, both in terms of the overall tenure split, and then the detailed unit mix within those tenures, to meet identified local need. The London Plan under policy H6 requires a minimum of 30% low-cost rented homes (either London Affordable Rent or Social Rent), a minimum of 40% intermediate products that are genuinely affordable (such as London Living Rent and London Shared Ownership), with the remaining 40% to be determined locally by boroughs based on identified need.
- 7.43 Beyond the tenure mix policy requirement set out above, there is no absolute policy requirement around the precise housing mix within this (in terms of number of bedrooms etc). However this is a point of importance for the City Council as established in pre-application discussions with Westminster's affordable team, and as such the proposed mix has been developed to reflect local need in the Church Street area. This level of detailed engagement has also informed the strategy in relation to wheelchair accessible units, given Westminster's need for the larger social rented units to be wheelchair accessible, again driven by local need. The proposed housing mix within the affordable tenures has sought to respond specifically to local need to provide the greatest benefit possible to the local area based on discussions with Westminster.

- 7.44 Westminster's Draft City Plan sets out the local requirement to deliver 60% Intermediate housing, and 40% Social Rent or London Affordable Rent, as set out also within Policy 9 of the Draft City Plan. As such, the tenure split proposed has been developed in compliance with the London Plan policy, and also the emerging Draft Westminster City Plan, aligned to local need. Please refer to Appendix 5 (and below under 7.54) for a full breakdown of the accommodation schedule. This sets out the full tenure mix between Intermediate and Social Rented, which has been developed and refined in close consultation with Westminster's affordable housing team, providing a significant number of family sized homes within the Social Rented tenure, and conversely a mix of one and two bedroom units within the Intermediate tenure to meet local need.
- 7.45 As such, the on-site affordable housing provision at PGPS is fully policy compliant in line with the London Plan and Draft Westminster City Plan, providing in excess of the site's policy requirement in terms of absolute affordable housing deliver at 38% against the policy requirement of 35%, with the tenure split and unit mix developed to reflect local need.
- 7.46 Like West End Gate, the public benefits are further accentuated by the key role that PGPS will play in delivering the Council's Church Street Masterplan. As for West End Gate, the delivery of affordable housing by Berkeley is a key pre-cursor and facilitator for the delivery of Church Street Masterplan, providing new high quality affordable homes for current Church Street residents to move into. This will then free up sites within Church Street, facilitating their redevelopment, as has already been the case with West End Gate and the affordable homes that have been delivered for Westminster to date.

Additionality - Off-site Affordable Housing Nomination Rights

- 7.47 As set out above, the proposed development exceeds policy requirements around on-site affordable provision as set out in London Plan and Westminster policy. The applicant has worked hard to deliver exceptional public benefits for Westminster with regards to the on-site provision, but in addition by negotiating nomination rights for Westminster residents and workers to a further element of Intermediate affordable housing, which is not required by policy specific to the PGPS site. This additional benefit is being delivered through MOPAC's portfolio agreement on other sites that they are disposing for residential redevelopment.
- 7.48 Officers at the GLA have discussed the MOPAC Portfolio Agreement with the applicant, which has been agreed in line with the Mayor Viability SPG. Berkeley have engaged in this process to establish whether there is a potential exceptional public benefit to Westminster that is possible to be delivered by facilitating rights to affordable housing being delivered as part of MOPAC's wider portfolio.
- 7.49 It has been identified that there is an opportunity for Westminster residents to have nomination rights to access a proportion of the intermediate shared ownership homes which will be delivered on MOPAC's Colindale sites with the London Borough (LB) of Barnet's Affordable Housing Co-ordinator.
- 7.50 Barnet officers confirmed that for the two MOPAC Colindale sites, for the first 3 months of marketing it may be possible for priority to be given to applicants that live and /or work in Westminster or Barnet on the additional 10% intermediate homes delivered to

satisfy the Portfolio agreement requirements i.e. those beyond the first 50% affordable housing. It is likely these additional homes will be shared ownership. This 10% equates to approximately 68 homes. The timing of the delivery of these homes is to be determined.

- 7.51 Westminster officers are aware of the intention between the applicant and GLA to bring this additional affordable housing forward for Westminster residents. This has been reflected in appropriate wording within the draft S106 agreement discussed further in Section 8 of this report, however the delivery of these homes is the responsibility of MOPAC and not Berkeley and is subject to a future application and determination by LB Barnet, and as such the applicant has no control over this additional affordable housing. Significant endeavours have been made by the applicant to deliver an exceptional public benefit to Westminster as set out above. A letter has been provided to Westminster setting out the principal of the agreement by the GLA and MOPAC.
- 7.52 This approach and redevelopment of sites in Barnet will bring the total of affordable housing being delivered by MOPAC through their portfolio agreement up to 50% which meets Policy H4 'delivering affordable housing' of the London Plan.
- 7.53 This additional affordable housing would be over and above the affordable housing policy requirements specific to the PGPS proposal. The applicant will continue to liaise closely with the GLA to assist in this additional affordable housing to come forward.

Housing Mix

- 7.54 The proposed housing mix provides a range of unit sizes in order to deliver a mixed and inclusive neighbourhood in accordance with Policy H10 'Housing size and mix' of the London Plan, providing a range of housing sizes to meet a variety of local need.

Tenure	Studio	1bed	2bed	3bed	4bed	Total
Private	32	107	102	98	7	346
Social	0	8	41	34	1	84
Intermediate	0	82	44	0	0	126
Total Units	32	197	187	132	8	556
Total (%)	5.8	35.4	33.6	23.8	1.4	100%

- 7.55 The proposed housing mix has been developed in accordance with the needs of the borough, specifically the requirement for family housing and more limited need for studio units within a single development.
- 7.56 The mix has evolved during the pre-application process with Westminster officers, namely to increase the proportion of family sized homes to be policy compliant. There are then nuances within the private, intermediate and social tenures to make the mix within each appropriate for that tenure. As set out above, the mix within the social rented tenure for example has been closely developed with Westminster to meet local and general housing needs, and those of existing residents within the Church Street

Housing Renewal Area. The Intermediate tenure mix similarly reflects the pressing need to deliver smaller affordable homes for key workers in Westminster.

- 7.57 It is proposed for 139 units to be family sizes (3 bed or larger) which equates to 25% and 39 units to be studio units which equates to 9% of the total units in accordance with Policy 10 'Housing for Housing for specific groups' of the City Plan. Furthermore, none of the proposed units will exceed 200sqm (GIA) in accordance with Part B of Policy 8 'Housing delivery'. Again this aspect of the proposal evolved through the pre-application process, including the reduction in size of the largest penthouse units to optimise housing delivery at the site and number of family sized homes.
- 7.58 This is also in compliance with London Plan policy H10 Housing Size Mix, which states that schemes should generally consist of a range of unit sizes, having regard to local evidence and housing need, and the requirement to deliver mixed and inclusive neighbourhoods, which the Proposed Development comprehensively achieves through the proposed range of private and affordable accommodation, and the variety of unit types proposed within each tenure.

Residential density

- 7.59 The density of the Proposed Development should be considered with regards to London Plan Policy GG2 'Making the best use of land' and the housing SPG (2016), which in light of the rapid growth expected by 2041, indicates that increasing pressures will be brought on the use of land.
- 7.60 Policy D2 'Infrastructure requirements for sustainable densities' and Policy D3 'Optimising site capacity through the design-led approach' encourage and promote places to become higher density in appropriate locations such as this which are well connected to jobs, services, infrastructure and amenities by public transport, walking or cycling.
- 7.61 The Density Matrix (Table 3.2) of the Housing SPG dictates that for the accessibility of the site (PTAL rating 6) and its setting, a density range of up to 405 units per hectare is considered acceptable, which this development exceeds. However the new London Plan (2021) has removed the density matrix from policy, instead making density and site optimisation an iterative, design led process. Policy H1 'Increasing Housing Supply' requires the optimisation of potential sites for housing delivery on suitable and available brownfield sites, including those with high public transport accessibility, and in relation to the redevelopment of surplus public sector land.
- 7.62 This approach to optimising site density to facilitate and optimise housing delivery is also set out in the Draft City Plan under policy 8 'Housing Delivery', which focuses on the need to optimise sites in Housing Renewal Areas, and planning positively for tall buildings in certain locations. Both provisions apply to PGPS.
- 7.63 Officers are supportive of the density being achieved given the above considerations, including its public land status, excellent public transport accessibility, presumption to include tall buildings, and priority to deliver new housing.

Residential Quality and Wheelchair Accessible/Adaptable Homes

- 7.64 The proposed scheme has been designed to fully accord with the standards set out within the London Plan, the associated Housing SPG (2016) and Building regulations.
- 7.65 The proposed residential units will all exceed the Nationally Described Space Standards and in this respect are consistent with London Plan Policy D6 'Housing quality and standards' of The London Plan and Policy 12 'Housing quality' of the City Plan.
- 7.66 All the proposed residential units will have access to a private balcony and accord with the Private Outside and Inside Space standards contained within policy D6 (F). Furthermore, all residential occupiers will have access to the communal roof terraces located on blocks J and private occupiers will also be able to access the shoulder (lower part) of Block K.
- 7.67 All units have been designed to optimise space including maximising view and orientation, with 60% of all residential units being dual aspect and the majority of single aspect units being south, east or west facing. Further detail on this is set out in the Design and Access Statement, including design innovations to include the residential quality of single aspect units.
- 7.68 10% of the units are wheelchair accessible in line with Building Regulations, with the remaining 90% being wheelchair adaptable, which is in line with Westminster Policy and the London Plan. There have been discussions with Westminster's Affordable Housing team around the inclusion of a higher number of wheelchair accessible homes within the affordable housing tenures of the scheme, which is associated to Westminster's demand profile in line with local need. At the same time, the London Plan under policy D7 Accessible Housing requires the accessible homes to be provided across tenures equally. The proposed distribution of the 56 wheelchair accessible units is 38% within the social rented tenure, 38% within the intermediate tenure, and 24% in the private tenure. This mix is considered to be an appropriate and balanced response to the requirements set out in policy D7 of the London Plan, and in response to Westminster's local need and requirements specifically for affordable homes.
- 7.69 The Design and Access Statement sets out how the scheme meets inclusive design requirements in line with Policy D5 'Inclusive design' and Policy D7 'Accessible housing' of the London Plan.

Design and architecture

- 7.70 A Design and Access Statement has been prepared by Squires and Partners which sets out the site and context appraisal, provides background on the WEG Masterplan, and explains the design development and the proposed scheme design including the landscaping proposals. The evolution of the scheme in response to pre-application engagement and public consultation is set out in Chapter 5 of this statement.
- 7.71 The report also details the access, servicing standards in dwellings, parking and cycle, refuse storage and collection, safety and security. The concept for the site focuses on public realm, the continuation of the mansion block typology, and the introduction of a

gateway tower as the three key elements have informed the design approach of the proposed development.

- 7.72 It has been a core design principle to open up the site, create new pedestrian routes through and into Newcastle Place along with quality new landscaping for residents and the public to enjoy. Reference of the surrounding mansion blocks and residential character of Little Venice and other character areas has also been designed as a continuation of the typology also tying into the earlier phases of the WEG Masterplan.
- 7.73 The tallest element (Block K) is intended as a gateway marker, designed in full consideration of its townscape significance including long distance views and local views as well as other tall buildings in the area. Principally the facade is designed to be vertically expressed and with a minimum number of bays. The simplicity of the design creates an organic rhythm of expressed columns, spandrels, bays and balconies that are recognisable as residential buildings.
- 7.74 The scheme design has evolved over numerous pre-application discussions with Westminster Planning and Design and conversation Officers (full Details set out in Section 5) with a series of different site layouts and built form options being considered. The design proposals are considered to meet all relevant policy including London Plan Policy D4 'Delivering good design' and Policy D5 'Inclusive design'.
- 7.75 A number of key design opportunities has driven the development of the massing and building layouts including:
- Introduce much needed permeability to the site replacing the outdated and underutilised former police station buildings.
 - Regenerate and activate the corner of Edgware Road to create a new urban realm and destination.
 - Create pedestrian movement from Harrow Road to Newcastle Place.
 - Create a grouping of tall buildings reflecting the height and prominence of the Westmark and 1 Merchant Square to allow the new cluster of tall buildings to gradually step up in height.
 - Frame the entrance to Newcastle Place with a feature building adjacent to the corner of Paddington Green that utilises the unique site constraints to create an architecturally striking building form.
 - Connect Paddington Green and Edgware Road with a new high quality landscaped through road.
- 7.76 Each building has been designed to have its own architectural character whilst sitting comfortably as part of the wider West End Gate Masterplan
- 7.77 All external envelopes are designed to a 'fabric first' approach with each building responding to the constraints and opportunities presented by their position on the site, in terms of noise, solar shading and glare. The facade design aims to maintain an overall

theme across the Masterplan through the selection of feature stone panels, horizontal stone bands and bronze coloured windows to all building blocks.

- 7.78 The building facades consists of a unitised curtain walling system with high performance double/triple glazed and insulated metal panels. The stacked balconies are used as one of the main elements to provide depth and architectural detail in the facade. The bays and balconies are grouped together and masonry elements are defined with GRC panels and precast stone spandrels and reveals. Balconies are protected to the edge by 'bronze' coloured balustrades to match the tone and colour of the window system. At ground floor the common parts are glazed to allow for views to the landscaped areas and provide natural surveillance.
- 7.79 The frontages of the retail and commercial units to Edgware Road and Harrow Road will be fully glazed to maximise street animation and address the neighbouring streets. The window and door frames at ground floor will match the 'bronze' coloured window type frames to the office and residential units above. Louvres and doors for ventilation of plant rooms will match the colour and finish of the windows used elsewhere.
- 7.80 A high quality pallet of materials are proposed, taking inspiration from the surrounding context which will work in a variety of scales from the street level to longer views. Materials will be brought together with a high level of craft, detail and architectural integrity. This design will be sympathetic with the quality and craft of the listed buildings of Paddington Garden Conservation Areas whilst also drawing on the new vernacular developed as part of the West End Gate Masterplan.
- 7.81 Blocks I and J are predominately residential with ground floor active uses. Both buildings employ a similar palette of materials clad in terracotta coloured glass reinforced concrete (GRC) designed with a degree of texture and detail which reflect the local quality of Maida Vale Mansions. The high performance glazing and 'bronze' coloured cladding panels will form the glazed openings.
- 7.82 Block K is designed in contrast to the other blocks, adopting a contrasting tone and articulation to set it apart from the other buildings and allow it to sit comfortably with the existing Westmark tower at WEG. This buildings has a lighter palette that draws inspiration from the existing Westmark and seeks to build on this standard to deliver a more organic and dynamic facade response. The final material selected will depend on the ability of sustainable sourcing of materials and the ability to age well and will be investigated further in the detailed design stages.

Tall Buildings

- 7.83 A separate Tall Buildings Policy Assessment by Montagu Evans is included as an appendix to this Planning Statement, given the importance of this policy issue in relation to the proposed development. This includes a full policy analysis against adopted London Plan and Westminster City Plan policy, and also against Westminster's Draft City Plan Policy which is a material consideration.
- 7.84 As set out in the pre-application section of this Planning Statement, the height, bulk and massing of the Proposed Development has evolved significantly over the course of the

pre-application stage, with significant reductions in height delivered in response to comments received from officers and public consultees.

- 7.85 The applicant also engaged with the plan making process for Westminster's Draft City Plan, including reference to the emerging tall building policy, including through the Regulation 19 consultation process. As such this application and the related Tall Building Policy Assessment (see appendix) set out the justification and design rationale for the proposed height, bulk and massing of the proposal, based on a detailed analysis of the site and its surrounding context.
- 7.86 This is considered alongside other key policy presumptions and expectations around optimising housing delivery, affordable housing provision, the delivery of public sector land and other considerations that have driven the optimised design. It is considered that the proposal responds to the immediate and surrounding context, and is in accordance with tall building's policy, albeit while exceeding the heights framework set out in the Draft Westminster City Plan. This is however considered to be justified in design, heritage and townscape terms, and should be considered alongside the exceptional public benefits being delivered by the proposal as set out in Chapter 9 of this Planning Statement.

Heritage Assessment

- 7.87 A Heritage Statement has been prepared by Montagu Evans which assesses the heritage assets in close proximity to the site and sets out the mitigation measures that have sought to reduce the potential effects and enhance the setting and ability to appreciate the heritage value of the site. Refer also to the BHTVIA summary section that follows this.
- 7.88 The northern half of Newcastle Place, which is within the redline boundary, is located within Paddington Green Conservation Area (CA), so there is potential for a direct effect on the CA, and a setting effect on the rest of the CA, and other heritage receptors in the vicinity. Great weight has been given to the conservation of heritage receptors affected by the proposed development. The significance of the majority of designated heritage assets would be preserved by the proposed development.
- 7.89 The conclusion of the heritage assessment is that there would be a harmful setting effect on a grade II listed terrace in Warwick Avenue (Nos. 4-16 (even) and No. 20 Howley Place), because the proposed development would appear above the roofline of the listed terrace, in an area of uniform historic character. The harm would be limited, less than substantial (as defined by the NPPF) and at the lower end of the scale.
- 7.90 It is recognised that any degree of harm to a designated heritage asset is of great weight in the planning balance, albeit its limited degree is relevant in the weighing exercise required by paragraph 196. Chapter 9 and 10 of this Planning Statement identifies the exceptional public benefits of the scheme, and carries out the weighing exercise.
- 7.91 The assessment identifies some modest beneficial setting effects of the proposed development, because it will replace a large, unattractive and disused building with a development of high architectural quality in superior materials, albeit of larger scale. The setting and appreciation of the significance of Paddington Green Conservation Area

and the listed buildings fronting the Green, and the grade II* listed Marylebone Lower House North Westminster Community School, would be slightly enhanced by the proposed development. The public realm enhancements to Newcastle Place would have a direct beneficial effect on the Paddington Green Conservation Area. The Rottingdean judgement has clarified that any such benefits to designated heritage assets are of great weight in the planning balance.

- 7.92 The pre-application feedback from the Council on heritage matters has been limited, for example it did not form part of the formal pre-application response dated 15 February 2021. However, email correspondence with Officers explained that they consider that the scale would harm the setting of several heritage assets, including the Maida Vale and Paddington Green Conservation Area and grade II* Church of St Mary, however this harm is felt to be less than substantial.
- 7.93 The conclusion of the Heritage Assessment submitted with this application differs as a result of a difference in professional judgment. The Heritage Assessment identifies slight positive effects on the Paddington Green Conservation Area and grade II* Church of St Mary, and no harm to the Maida Vale Conservation Area. This conclusion derives from the following considerations. First, the proposed increase in scale will be experienced in the setting of existing tall buildings at WEG and Paddington Basin. Second, the existing building on the site, the former Police Station, is itself a large building (with 8 storey and 17 storey elements) but of poor architectural quality, and are largely disused. Third, its replacement with buildings of high design quality and public realm enhancements would therefore be a positive change, despite the increase in scale.
- 7.94 Nevertheless if the Council concludes that the proposed development causes less than substantial harm to these designated heritage assets, it would inevitably be at the lower end of the scale, given the public realm enhancements and improved design quality of the proposed building. Whilst the harm would be of great weight in the planning balance, it would need to be weighed against the considerable public benefits of the proposed development, as required by paragraph 196 of the NPPF. Chapter 9 and 10 of this Planning Statement identify the exceptional public benefits of the proposal, and carries out this weighing exercise.
- 7.95 During pre-application discussions the Council requested that the reuse of the decorative bas relief panels on the sides of the former Police Station be explored, potentially in the subway to Merchant Square. We note that the former Police Station is not located in a Conservation Area, nor has it been identified as a non-designated heritage asset during pre-application discussions. The panels could therefore be removed without the need for planning permission. However, the applicant is content to work with the Council to find an alternative location for these panels elsewhere in the immediate locality, to be secured by planning condition if required.
- 7.96 In conclusion, the proposals comply with all relevant national and local planning policy on the historic environment, including Policy HC1 of the London Plan, S25 of the Westminster City Plan (2016), and Policy 39 of the Draft City Plan. In granting planning permission for the application, the Council would be discharging its statutory duty with respect to section 72(1) and section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act (1990), subject to the consideration of public benefits set out

in this Planning Statement, and the conclusions of the planning balance exercise set out in Chapter 9 and 10.

Built Heritage, Townscape and Views

- 7.97 A Built Heritage, Townscape and Visual Impact Assessment (BHTVIA) has been prepared by Montagu Evans as part of the ES. The Application Site does not contain any heritage assets although there are heritage assets in the wider area (and a very small portion of the redline falls within the Paddington Green Conservation Area), and the BHTVIA assesses the potential of the proposed development to impact their setting. The Tall Buildings Policy Assessment by Montagu Evans attached to this Planning Statement as an appendix includes a relevant section on views analysis in relation to tall buildings policy.
- 7.98 The BHTVIA considers the proposed development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces. The visual assessment considers the impact of the proposed development upon visual receptors, assessing how people will be affected by the changes in views and visual amenity at different places, including publicly accessible locations. Viewpoint locations were agreed with officers during pre-application discussions, and have been adopted and assessed.
- 7.99 The townscape surrounding the site may be categorised into six distinct areas. These broadly comprise residential, office and urban. The following 6 character areas (within a 750m radius from the site) have been assessed with regards to direct and indirect effects from the proposed development:
- Paddington Green (TCA1)
 - Lisson Grove (TCA2)
 - Paddington Basin and surrounding area (TCA3)
 - East of Edgware Road (TCA4)
 - Maida Vale and Little Venice (TCA5)
 - Bayswater (TCA6)
- 7.100 The visual assessment illustrates and considers the existing baseline view, the future views (with the development built) along with cumulative scheme that have been granted planning permission to understand the impact on all 37 identified views. A summary table summarises each view, location, visual amenity value, receptors, susceptibility to change, sensitivity, magnitude of impact and likely effect on the site preparation and construction, operation and cumulative views.
- 7.101 In respect of views, the site is not located within the Landmark Viewing Corridor of any identified strategic views in the London View Management Framework. However, consideration was given to the strategic views from Primrose Hill (LCMF 4A.1, Viewpoint 26 in the assessment) for completeness meeting London Plan Policies HC3 and HC4 and Draft Westminster City Plan Policy 40.

7.102 Part of the site is located within the Paddington Green Conservation Area; Newcastle Place is within the site where public realm enhancements are proposed, and the northern half of Newcastle Place is within the CA. Otherwise, the potential likely effects are all indirect likely effects, i.e. the potential for change to the heritage value of the receptor arising from a change to its setting.

Demolition and Construction Phase Impacts

7.103 During the demolition and construction phase, the likely effects on designated heritage receptors would range from None to Minor Adverse. These effects would not be significant, and would be indirect, temporary and short- to medium-term in duration.

7.104 In terms of townscape, there would be a Minor Adverse likely effect on the character area in which the site is located (TCA1: Paddington Green). This effect would not be significant. It would be direct, temporary and medium term. The remainder of the surrounding townscape areas would experience likely effects of None to Negligible Adverse, depending on the proximity and relationship between the TCAs and the site. These effects would be indirect, temporary, medium-term and not significant.

7.105 There would be no significant likely effects on visual receptors at this stage of the proposed development. The likely effects range from None to Minor Adverse, depending on the proximity and relationship between the viewpoint and the site. These likely effects would be indirect, temporary, medium-term and not significant.

Completed Development Impacts

7.106 Following the completion of the development, the heritage receptors would experience likely effects ranging from None to Minor-Moderate Beneficial, which would not be significant. Minor-Moderate Beneficial likely effects would apply to the listed structures at Marylebone Lower House North Westminster Community School (grade II*). The beneficial effect would be derived from the overall improvement to the setting in which the listed buildings are appreciated.

7.107 There would be a Minor-Moderate Beneficial likely effect on the character area in which the site is located and one other townscape character area (TCA1: Paddington Green and TCA3: Paddington Basin and surrounding area). These likely effects would be significant. They would be direct, permanent and long-term.

7.108 There would be None to Minor Beneficial effects on the surrounding character areas. These likely effects would not be significant and would be direct, permanent and long-term.

7.109 There would be Moderate Beneficial effects on the visual receptors experiencing the proposed development in views 6 and 6W. These effects would be significant, direct, permanent and long-term. There would be None to Minor-Moderate Beneficial effects on the remaining visual receptors and views. These likely effects would not be significant and would be direct, permanent and long-term.

7.110 The proposed development has evolved through a detailed understanding of the site and its surrounding context. The BHTVIA demonstrates the proposed development would not give rise to any unacceptable impacts to heritage, townscape or visual receptors.

- 7.111 On the whole, the proposed development would demonstrably improve the appearance, character and function of the townscape, in line with Westminster draft City Plan Policy 40 Townscape and Architecture. The DAS and the HTVIA both illustrate how the development has been sensitively designed, having regard to the prevailing and contextual heights and character around the site. In addition, in line with the requirements of part (F) of policy 40, the scheme has been assessed in the context of the identified strategic and local views, and it has been identified that the contribution of the Proposed Development to the views will be positive and beneficial in many instances.
- 7.112 Similarly, London Plan Policy HC3 Strategic and Local Views, and policy D9 Tall Buildings requires the visual impact of proposed tall buildings to be assessed, examining the impact on views from different distances, while also considering aspects such as the immediate spatial hierarchy, the architectural quality, the impact on heritage assets and other considerations. As set out above, this has been thoroughly assessed in the ES chapter, and is also set out in the Tall Building's policy analysis section above and in Appendix 1 to this statement. A number of enhancements to views have been identified through the assessment undertaken, illustrating compliance with both Local Plan and London Plan policy around views and townscape, and specific criteria relevant to tall buildings.

Wind and Microclimate

- 7.113 Ramboll have undertaken a Wind Microclimate Assessment which detailed the likely effects as a result of the demolition and construction stage and the completed development stage of the proposed development, taking into account the relevant national and local guidance and regulations.
- 7.114 For the demolition and construction stage, wind conditions were assessed qualitatively, using professional judgement of an experienced wind engineer, based on an assessment of the background wind climate at the site, and the results from the wind tunnel tests.
- 7.115 In summary, it is considered that the demolition of the existing site and construction of the proposed development would result in a negligible (not significant) effect on wind microclimate and identified receptors, and as such would not give rise to significant effects on wind microclimate.
- 7.116 During the phased occupation, construction of Block I would be within Phase 1 and Blocks J and K within Phase 2. Wind conditions would gradually adjust from the existing baseline scenario to those described below for the completed development, and would therefore range from Negligible (not significant) to Moderate Adverse (significant).
- 7.117 With the proposed development complete and operational, the majority of the site would have suitable wind conditions and there would be no strong wind exceedances which would pose safety concerns.
- 7.118 With the introduction of the proposed landscaping scheme and mitigation measures, wind conditions at windier than suitable seating spaces would improve. However, three isolated spaces situated north and south of Block K, and on the terrace of Block K would remain windier than suitable for sitting use. Pedestrians/occupants would be expected

to use nearby spaces which would have suitable conditions, should these locations be unsuitably windy.

- 7.119 Overall, it is considered that the completed proposed development would result in effects that range from moderate beneficial to minor adverse in terms of the effect on wind microclimate and identified receptors.
- 7.120 Westminster Draft Policy 41(B) Part 5 relates to the design of Tall Buildings, and requires mitigation for any negative impacts on the microclimate at the site and surrounding area. Landscaping and other mitigation has been developed to improve identified areas around the site, while the orientation and shape of buildings has also been developed with microclimate in mind, to minimise any adverse impacts resulting from the development.

Daylight and sunlight

- 7.121 A daylight, sunlight, overshadowing and solar glare report has been prepared by GIA to assess the effects to arise from the demolition and construction stage and the completed development stage of the proposed development on the surrounding relevant receptors, which are identified in the assessment that comprises Chapter 10 of the ES, and the associated appendices to the ES. The proposals have been developed in consideration of new and emerging London Plan policy and guidance, Westminster Draft policy 7 Managing Development for Westminster's People, and long adopted policy including UDP Policy ENV13.
- 7.122 Of relevance is the setting of the site, and its context within a dense urban location that features many tall buildings. The supporting text to Westminster's Draft City Plan Policy 7 states that the City Council will take a balanced approach that considers the specific location and context as well as the merits of each proposal including the wider benefits a scheme can deliver, against impacts on the surrounding area. Equally, London Plan policy D6 Housing quality and standards states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context.
- 7.123 The Draft GLA Guidance 'Good Quality Homes for all Londoners' (consultation draft – consultation ended January 2021) provides an interpretation of the BRE Guidance in the context of London, and specifically in relation to VSC analysis, adopting a 50 degree development angle for London, against a 25 degree development angle that corresponds to the BRE target of 27%. The Draft Guidance also promotes the use of Average Daylight Factor as a key measurable standard in addition to other measures.
- 7.124 The site's layout and other policy priorities around optimising the public sector land for housing delivery, and delivering regenerative benefits is also a material consideration that has informed the development of the site, as has its suitability to accommodate tall buildings, as set out in Draft Westminster policy. The linear, narrow nature of the site also affects the number of design options for the arrangement of buildings, however the design has evolved to ensure that orientation, arrangement and the retention of gaps between buildings will deliver daylight and sunlight penetration through the site.

7.125 For daylight and sunlight, the study area was defined by the extent of residential properties which have windows facing the site (within 500m from the site boundary) and that were considered in close enough proximity to the site to be potentially affected by the proposed development. The principal properties that have been assessed include:

- Berkeley's West End Gate site, principally Block A, Block B, Block G, Block H.
- Properties on the eastern side of Edgware Road
- Properties within Princess Louise Close and on Paddington Green
- Properties on Corlett Street, Penfold Place, Gilbert Sheldon House, Bell Street, Hall Tower. The exact addresses of those buildings tested are set out in the ES chapter.
- 1 and 6 Merchant Square.

7.126 In relation to the overshadowing assessment, outdoor amenity areas considered in close enough proximity to be affected by shadow cast from the proposed development were identified by professional judgement and was found to be amenity areas within an approximate 150 m radius from the site boundary which are located north from due east to due west.

7.127 Locations at surrounding road junctions and approaches from which the proposed development is visible within a road user's line of sight are considered sensitive to solar glare. Therefore, viewpoints have been placed at surrounding sensitive locations within an approximate 600 m radius from the site boundary.

7.128 The technical analyses carried out to inform the assessments have been undertaken by creating a digital 3D model of the existing site, proposed development and surrounding study area, based on measured survey data.

7.129 The following BRE methodologies have been used to assess the daylight and sunlight effects on the sensitive receptors when the proposed development is completed and operational:

- Daylight
 - Vertical Sky Component (VSC);
 - No Sky Line (NSL) Method; and
 - Average Daylight Factor (ADF)
- Sunlight
 - Annual Probable Sunlight Hours (APSH); and
 - Winter Probable Sunlight Hours (WPSH).
- Overshadowing
 - Transient Overshadowing; and
 - Sun Hours on Ground

7.130 The report sets out the assumptions and limitations that have been used in assessing the above given the information available and the use of professional judgement and a

reasonable flexible approach as set out by paragraph 123c of the NPPF, Policy C5.3 of the Housing SPG (yet to be adopted) and Policy D6 of the new London Plan 2021.

Flexible Approach and Alternative Targets

- 7.131 The ES sets out that given the location of the site, typical VSC levels to be expected in Central London should be provided to indicate whether VSC to surrounding sites are appropriate, to give a more appropriate benchmark for acceptable levels to neighbouring properties. This is in place of using the 27% figure indicated in the BRE guide, which is a national standard.
- 7.132 This view is supported by Para 123c of the NPPF, which states that authorities should take a flexible approach in applying policy and guidance on daylight and sunlight where they would otherwise inhibit making efficient use of a site. This is also supported in emerging GLA Housing guidance policy C5.3 which states that BRE guidance should be applied sensitively to higher density development, where BRE suggests using alternative targets, taking into account local circumstances, the need to optimise housing capacity, and the scope for the character and form of an area to change over time.
- 7.133 As such, retained levels of daylight are taken into consideration as part of the scale of effects, given the difficulty in avoiding large factor reductions in dense urban locations. As such, weight should be given to retained values and not just the percentage change. This is of specific importance in relation to the existing properties on Edgware Road, to Blocks A, B, and H of West End Gate/Paddington Green, and to 1 and 6 Merchant Square.
- 7.134 The range of baseline levels of light for these properties have been adopted in the ES as appropriate alternative targets. For the properties on Edgware Road, the typical VSC for site facing windows from first to third floors of these properties ranges from 11-25% VSC. This is representative of the VSC levels consented for the WEG Development. As such, in relation to the impacts of PGPS on these properties, retained levels of VSC which fall within this range can be considered acceptable.
- 7.135 For WEG Blocks A, B, and H, VSC, NSL and ADF have all been assessed. The BRE guidance states that for new development neighbours, meeting a set ADF target with the proposed development in place could be an appropriate criteria. The majority of all living rooms within these blocks see ADF levels of between 0.1-1.5%, with VSC levels typically being between 0-10%. Again, when the effects of the proposed PGPS development are considered, retained levels of ADF and VSC within these ranges can be considered acceptable. A similar approach is taken to the assessment of effects at 1 and 6 Merchant Square.
- 7.136 It should be noted that where existing levels of natural light within properties are low, any alteration would result in a disproportionate percentage change, when the actual change experienced by the occupier may not be as noticeable as the percentage change suggests. Detailed design considerations such as window size, room use, room size and aspect should be taken in to account, especially where there are mitigating factors such as balconies, overhangs or other features that may impact on the assessment.

Demolition and Construction Effects

- 7.137 The demolition and construction effects of the proposed development would be temporary, medium-term **Negligible Adverse** (not significant) at the point of demolition and commencement of construction. Throughout the duration of the construction period, as the proposed development superstructure is built out and clad, the effects would increase until reaching those represented in the completed development.
- 7.138 Overall, it would be that the demolition of the existing site and construction of the proposed development would result in temporary, medium-term **Negligible** (not significant) to **Major Adverse** (significant) daylight, sunlight, overshadowing and solar glare effects on identified receptors.

Existing Baseline Assessment

- 7.139 In the existing baseline, in relation to daylight, a total of 633 windows serving 404 rooms were assessed within the 41 relevant existing residential buildings. For VSC, 537 (78%) of the 633 windows assessed would meet the BRE criteria, and for NSL 388 (83.7%) of the 404 rooms assessed would meet the BRE criteria, showing a high level of compliance.
- 7.140 In terms of the ES assessment of impact, the completed proposed development would result in permanent, long-term **Negligible and Minor Adverse** effects on 27 surrounding properties, which would be not significant, as reflected above.
- 7.141 A further 11 surrounding properties along Edgware Road, as well as WEG Blocks A and B would experience permanent, long-term **Moderate Adverse** and significant effects. A further three properties along Edgware Road would be considered to experience permanent, long-term **Major Adverse** and significant effects.
- 7.142 In relation to sunlight, the completed proposed development would result in permanent, long-term **Negligible** and **Minor Adverse** effect on 32 surrounding properties, which would be not significant. The remaining eight surrounding properties along Edgware Road as well as WEG Blocks A and B would be experience permanent, long-term **Moderate Adverse** and significant effects.
- 7.143 Owing to scale of the proposed development, reductions of this scale would be anticipated within an urban location. However, the levels of daylight and sunlight retained at each of the properties which would experience significant effects should be considered, and based on professional judgement the retained levels are acceptable for an urban location as set out in the section above in relation to the flexible approach and alternative targets that should be applied, particularly for the WEG blocks and properties on Edgware Road.
- 7.144 Please refer to the ES chapter for the detailed assessment of each property, including context and clarification around retained values and baseline levels of VSC and NSL, which contextualises the impact. To draw out one property as an example of the assessment methodology, 316 Edgware Road had six windows assessed (the use of these rooms is unknown), all experiencing a reduction in VSC of 30-39.9% which is a moderate adverse effect. All windows would however retain between 13.1-14.6% VSC which falls within the range of typical values for these properties, and can therefore be considered acceptable, as set out in the flexible approach methodology above.

- 7.145 As a further example it is worth considering WEG Block A. In terms of daylight a total of 629 windows were assessed serving 419 rooms. Of these 629 windows, 371 (59%) meet BRE's criteria, 18 experience a reduction of between 20-20.9% (minor adverse), and a further 36 would experience a reduction of 30-39.9% (moderate adverse). As such, 68% of windows will experience no impact or impacts ranging to moderate adverse.
- 7.146 The remaining 204 windows (32%) would experience major adverse effects, all of which are located in the south facing elevation of the Block, and including 108 bedroom windows which are of lesser importance in relation to daylight. The windows face over the site in its existing condition, which therefore receive uncharacteristically high levels of daylight for the urban context, and many also sit behind recessed balconies which impacts the daylight received. As such, reductions in VSC are partly related to the design of the building itself. Furthermore, retained values are in line with those approved in relation to comparable rooms on the northern elevation of the building, illustrating an acceptable level of retained daylight.
- 7.147 A similar analysis showing greater overall compliance applies for NSL analysis as set out in the ES, which as stated above sets out this full contextual assessment for each identified property.

Future Baseline Assessment

- 7.148 In the future baseline, in relation to daylight, only three surrounding existing properties and WEG Blocks A, B and H were considered. All other properties would experience the same levels of daylight and sunlight as the existing baseline assessment above, and therefore were not assessed further.
- 7.149 A total of 757 windows serving 488 have been assessed. In terms of VSC, 415 (55%) of the windows would meet BRE criteria, and for NSL 373 (74%) of the 488 rooms assessed would meet the BRE criteria.
- 7.150 The completed proposed development would result in **Negligible and Minor Adverse** effect on two surrounding properties, which would be not significant. However, residential Block B, WEG Block A, B and H would experience permanent, long-term **Moderate Adverse** and significant effects.
- 7.151 In relation to sunlight, the completed proposed development would result in permanent, long-term **Negligible to Minor Adverse** effects on the three surrounding existing properties and WEG Blocks A and B which would not be significant. The WEG Blocks H would experience permanent, long-term **Moderate Adverse** and significant effects.
- 7.152 Owing to scale of the proposed development, reductions of this scale would be anticipated. However, the levels of daylight and sunlight retained at each of the properties which would experience significant effects should be considered.
- 7.153 Again, taking a specific example of analysis, for Block A in terms of VSC, 371 of the 629 windows (59%) would meet BRE criteria and experience a negligible effect. A further 18 would experience VSC reductions of between 20-29.9%, which would be minor adverse, and a further 29 would experience reductions between 30-39.9% which would be minor adverse. As such 66% of windows experience no impacts, or reductions up to a minor

adverse level. A vast majority of the major adverse reductions experienced by the remaining 211 windows are comparable to the effects of the existing baseline scenario. The same considerations as set out above in relation to the existing baseline scenario in terms of retained values apply here.

- 7.154 Please refer to the ES for the detailed building by building analysis of the scenario, associated levels of impact and contextual considerations.

Overshadowing

- 7.155 In relation to overshadowing, three existing amenity areas tested would experience **Negligible** and therefore not significant effects. The two amenity areas within WEG would experience permanent, long-term **Minor Adverse** effects.

Cumulative Baseline Assessment

- 7.156 In the future baseline, in relation to daylight, both sensitive cumulative schemes tested, 1 and 6 Merchant Square would experience in **Negligible** effects from the proposed development which would be not significant.

Cumulative Effects Assessment

- 7.157 In the cumulative assessment, in relation to daylight and sunlight, all existing and future surrounding properties present in the future baseline were considered. Whilst additional impacts would occur as a function of the cumulative schemes coming forward, owing to the levels retained at each of the properties, the overall significance of effect would not change.
- 7.158 In relation to overshadowing, all five existing and future amenity areas tested in the future baseline would not experience a change in the overall significance of effects in the cumulative scenario.

Daylight & Sunlight Summary

- 7.159 As such, the Proposed Development does result in adverse impacts on the daylight and sunlight received by neighbouring properties, with the most significant impacts being to Berkeley's own adjacent buildings within West End Gate. The results have been presented in a number of ways, including providing analysis around retained values and average daylight factor, which helps to provide further context that is more specific and relevant to the dense urban location of the site, which is considered and stressed in emerging London Plan guidance.
- 7.160 As set out above by GIA in their summary above, the reductions in daylight and sunlight to neighbouring properties should be considered alongside the values that are retained by these properties to give a fuller picture of the overall condition.
- 7.161 The impacts should then also be balanced against the public benefits being delivered through the proposal, which are extensive as set out in chapter 9 and 10 of this statement, and have to be contextualised and balanced against other policy requirements and imperatives to optimise the site for housing delivery and regenerative benefits as surplus public sector land, and to deliver a viable and optimal scheme.

Landscaping and Public Realm, Public Art

7.162 The landscaping and public realm design has been prepared by Murdoch Wickham and provides the overall landscape vision, identifies the key landscape character areas and describes the detail design proposals for the landscape, encompassing the public realm and communal roof terraces with a view to complete the wider WEG Masterplan. The landscaping and public realm proposals are extensive, and result to a significant extent from the proposed stopping up of Newcastle Place, which facilitates the delivery of many of the benefits set out below.

7.163 Key components of the landscape and public realm proposals for Paddington Green Police Station are:

- Transformation of Newcastle Place into an ‘urban oasis’ providing green amenity space for residents and the wider public to enjoy.
- Restricted, one-way vehicle access to Newcastle Place reinforcing the pedestrian friendly character of this green amenity space.
- Provision of improved permeability throughout the site from Edgware Road to Paddington Green, between Harrow Road and Newcastle Place and connections to the wider Paddington Central area.
- Creation of a new landscaped plaza at the junction of Edgware Road Harrow Road and A40.
- An enlivened, enhanced, green and healthy streetscape along Edgware Road and Harrow Road.
- Integration with the future Transport for London (TfL) SUD proposals for the Joe Strummer subway, to be installed prior to redevelopment.
- Provision of communal roof terraces for use by residents, providing secure, door-step, amenity and play space and creating places to socialise.
- Integration of new tree planting and a diverse range of plant material to add scale, texture and colour to the landscape and increase local biodiversity and greening.
- Use of robust, high quality materials and furniture in the public and private realm.

7.164 The proposed landscaping elements can be seen in figure 7.1 below

Figure 7.1: Illustrative Landscape Masterplan



1. Gateway bosque terrace
2. Arrival water feature
3. Linear park
4. Pedestrian link
5. Streetscape improvements
6. Urban glade & plaza
7. Resident's roof garden
8. Nature garden

7.165 The landscape masterplan includes a variety of character areas which respond to the design and layout of the buildings, providing a range of public and semi-public communal, spaces enabling a variety of experiences to be enjoyed.

7.166 The new public realm links the busy Edgware Road retail and transportation hub, through the publicly accessible green urban oasis of Newcastle Place to the quietness and open space of Paddington Green.

7.167 Enhancement of the surrounding streetscape will facilitate circulation, promote active frontages and provide additional greening, while Communal residential gardens will provide additional amenity space for residents to the roof of Block J and shoulder of Block K.

7.168 The landscape masterplan recognises the importance of providing high quality, multifunctional, accessible outdoor space. Open space provision across the site includes a series of public and communal spaces that not only contribute to the setting of the buildings but add to the enjoyment and use of the development by providing a range of comfortable, engaging, innovative and accessible spaces for residents, workers and visitors to the area.

- 7.169 Within these areas, a range of features including, seating, lighting, a water feature, planting, wayfinding and play elements have been provided to activate and enhance the experience of the spaces around the buildings and encompassing the site, creating a variety of spaces for gathering and social interaction, active and passive recreation and general circulation and movement.
- 7.170 Responding to the ground floor non-residential uses the majority of external space within the site at ground level is publicly accessible. Generous footways adjacent to the building facades will support and promote spill-out uses at ground level. Block I also includes a couple of ground floor residential units fronting onto Paddington Green and Newcastle Place. The careful design of these units includes the provision of defensible space at the ground floor level, creating separation and security for future residents as set out in the Design and Access Statement.
- 7.171 As such the landscaping proposals are transformative and substantial, and will deliver significant place making and environmental benefits to the site and surrounding area, delivered in part through the stopping up of Newcastle Place. The stopping up will also remove the maintenance costs and burden from the City Council, providing a further benefit.
- 7.172 Importantly, the 'ground floor first' approach taken in terms of the site layout meets principal 3 of Westminster Draft Policy 41 (B) Tall Buildings, by delivering an attractive and legible streetscape that takes account of the use of the public realm for a variety of uses, and includes active uses at ground floor level.
- 7.173 In relation to Draft Policy 43 Public Realm, the proposal delivers well designed public realm using high quality materials, and extensive high quality soft landscaping including significant new tree planting as part of the streetscape design, which has been developed in line with officer comments. The public realm will be safe and accessible in line with part B of Policy 43 and creates a legible network of permeable spaces through and around the site, with a hierarchy of spaces including the re-imagined Newcastle Place, and connecting routes through to Harrow Road and Edgware Road, linking the site through to Paddington Green.
- 7.174 This creates clear sight lines through the site from Harrow Road and Edgware Road in particular, in comparison to the impermeable existing building and environment. Quiet routes are proposed, which promote walking and cycling through and around the site in line with draft Policy 25 Walking and Cycling, and all parts of the ground floor are fully publically accessible in line with the aspiration of policy 25 and 43.
- 7.175 In line with Policy 25 the development prioritises and improves the pedestrian environment, providing dwell and relaxation spaces including seating and spaces for congregation. The spaces are permeable, will contribute to way finding, be well lit and secure, with legible entrance points around the site for all uses including residential, office and other commercial entrances. The office entrance will be double height and act as a key indicator of activity and commercial use at the site. Around the site, the footpaths will be generous in terms of width, and comprise high quality materials with minimal clutter, making them inclusive and accessible for all.

- 7.176 Cycling is also supported, providing new safe routes and on street short stay cycle parking within the landscaping masterplan, in addition to private parking and facilities within the basement for users of the development.
- 7.177 In terms of other aspects of policy 43, active frontages are maximised to all three blocks, as is soft landscaping which provides visual and environmental benefits from the surrounding urban environment. As such, the proposal is extensive and comprehensive, and will re-integrate the site into the local community and neighbourhood in a way that the previous secure police station site was not planned to do. This was also a key focus area within the feedback from the public consultation. On approaching from the neighbouring tube station there will be clear routes and ground floor activity around the site, providing a clear focus and attraction for the local community.
- 7.178 Furthermore, the proposal will include installations and public art around the site in line with policy 43, and it is the intention to retain a portion of the modernist frieze that is currently located on the Harrow Road elevation of the Police Station.

Urban Greening & Biodiversity

- 7.179 The existing urban site will be transformed into an accessible landscaped area for use of both residents and the public. The proposals also deliver a significant increase in urban greening and a net gain in biodiversity. This is delivered in line with key environmental policy aspirations including Westminster draft Policy 34 Green Infrastructure and London Plan requirements around urban greening.
- 7.180 Draft Policy 34 will be met and exceeded, delivering city greening through substantial tree planting and soft landscaping, in addition to the incorporation of green roofs in the development. New public open space is provided in addition to children's play space. Biodiversity net gain is substantial, delivering significant enhancement on the existing situation and met in a number of ways as below, including substantial on site tree planting.
- 7.181 With the planting of semi-mature trees, multi-stem trees, specimens, shrubs, ground cover, lawns and accent species and bulbs for seasonal interest the biodiversity and habitats of the local landscape will be vastly improved.
- 7.182 Furthermore, the roof space between Blocks J and K has been allocated as a visual amenity garden (170sqm) which will be developed specifically for biodiversity benefits and include the planting of native and wildlife friendly species and creation of open mosaic habitat.
- 7.183 Although the assessed Urban Greening Factor score of 0.29 is below the Mayor's target score of 0.4, the improvements to the existing highly urban area is a vast improvement when considered against the constraints of the site and proposal of a predominantly residential mixed use development.
- 7.184 In terms of biodiversity net gain, the existing condition of the site creates an opportunity for significant enhancement. The proposal delivers a net gain of 6,157% net gain delivered through new vegetation and planting, new lawns, roof gardens, rain gardens, hedges, ground cover and grassland, and significant tree planting around the site. The six existing trees within the site will be retained, with 121 additional trees proposed as

part of the development, delivering significant benefits in line with Draft Policy 34 and London Plan objectives.

Amenity and Playspace

- 7.185 The site provides a total of 3,553sqm of public amenity space around the three Blocks and within the linear park to the south of Block A with WEG.
- 7.186 A total of 835sqm residential amenity space located on the roof of Block J and shoulder of Block K.
- 7.187 A total of 1,138sqm of play space is proposed which is integrated within the landscaping for the site including the full requirement of play space for children under 5 years.
- 7.188 Given the constraints of this Central London site, there is a shortfall in the required amount of playspace when reviewed against the GLA population yield calculator however this will be discussed with officers during determination and can form part of the S106 contributions. As such provision will be in line with the London Plan, and Westminster policy 12 and 43 through a combination of maximised on site provision given the constraints of the site, and off site contributions to address a shortfall.
- 7.189 The strategy has focused on providing on-site play opportunities for younger children and their carers which is deemed important in this area of London, and more generally due to the need for these facilities to be located within a very short walking distance for families with children of this age.

Street furniture and lighting

- 7.190 The furniture palette for the site has been designed to be contemporary, simple and robust; selected to be attractive yet functional, considering the issues of accessibility, durability and future maintenance in line with Westminster Draft Policy 43 Public Realm and Policy 25 Walking and Cycling, which are both explored in detail above.
- 7.191 The majority of trees and shrubs within the site will be in raised planters integrated with seating. Seating will have backrests and armrests to improve function for all users.
- 7.192 The public plaza located next to the Edgware Road junction will include an arrangement of feature seating benches within the urban glade trees. Selected benches will also include arm and back-rests and trees will be planted in discrete, flush tree surrounds.
- 7.193 The conceptual plan has been developed for the external areas of the site, providing lighting to support the functions of the different spaces within the scheme, highlight elements within the landscape and to ensure the safety and accessibility to all areas of the public and private realm, as well as complementing the external lighting on the buildings.
- 7.194 Newcastle Place will be lit with pole mounted area lighting illuminating access through the spaces and providing safety for all users. Uplights to trees in the landscape and within the water feature will also accentuate these features and will add to ambient light levels and mood in various locations around the site.

- 7.195 The existing lighting to the surrounding streets and footways will generally be maintained and upgraded where necessary to achieve the required lighting levels for access and safety around the perimeter of the site.
- 7.196 The proposed communal roof gardens and terraces will be lit with low level access lighting, with feature uplighting to selected trees providing highlights and a general ambient light to all areas without glare or impact on neighbours, and without creating additional light spill in the neighbourhood.

Sustainability

- 7.197 A sustainability Statement has been prepared by WSP which sets out that the scheme considered the principles of sustainability early in the design and planning process to ensure that the construction, operation and future occupation is as sustainable as sustainable as possible. This is in line with Westminster and GLA policy, as part of the wider aspiration to deliver high quality, sustainable architecture at PGPS.
- 7.198 The proposed development responds positively to the range of relevant policies relating to Environmental Rating Methods, Energy and CO2 Emissions Climate Change Adaptation, Water Efficiency, Materials, Waste Management, Pollution Management, Ecology & Biodiversity, Sustainable Transport & Access. The Proposed Development has endeavoured to ensure that social, economic and environmental issues are dealt with in an integrated and equal manner.
- 7.199 A BREEAM Pre-assessment has been carried out by an accredited BREEAM Assessor and is submitted with this application. As required by CoW local policy, all commercial areas of the Proposed Development are expected to achieve as a minimum a BREEAM 'Excellent' rating. At the same time, the energy strategy has been developed to connect to the existing WEG energy centre (which has existing capacity), alongside the provision of PV cells delivering on site renewable energy generation. This will deliver significant on site carbon reduction savings, as set out in the Energy section below.
- 7.200 The proposed development has ensured that it has reduced its external heat rejection to the atmosphere; has incorporated planting to combat the effects of climate change; and it has reduced its reliance on air conditioning systems to combat overheating by using solar control glazing, mechanical ventilation and reducing internal heat gains as far as feasible.
- 7.201 The proposed development is located within Flood Zone 1 and is at low risk of flooding from fluvial and tidal sources and it will not increase the risk of flooding to the Site or surrounding areas. SUDS are included in the proposed design, as are green roofs, landscaped gardens and attenuation tanks, providing further sustainability benefits.
- 7.202 The proposed development has been designed to maximise the opportunities for incorporating water saving measures which include the use of water saving fixtures and fittings, optimised water management through leak detection and reduced water flow rates.
- 7.203 As far as practicable, all materials used on site will have a low embodied energy; some of the key elements of the building envelope will achieve a rating of A+ to D in the BRE's

'The Green Guide' to specification and all the timber used on site will be sustainably sourced from accredited sources.

- 7.204 Additionally, in line with the GLA and RICS guidance, a Circular Economy Statement and whole life carbon analysis has been carried out to establish the waste and embodied carbon footprint and operational carbon of the development over a 60-year lifecycle and various design options to reduce carbon has been considered. Furthermore, the external materials will be specified to have low toxicity to humans and the environment, to be durable to cater for their level of use and exposure and the use of prefabricated materials will be maximised.
- 7.205 Both the construction and the operational waste will be effectively managed in accordance with national and local policy. Every effort has been taken to ensure the majority of demolition waste is reused or recycled and 80% per volume non-hazardous waste will be diverted from landfill in line with the BREEAM Wst 01 credit.
- 7.206 The scheme has been designed to have enough internal space and collection bins for the storage of recycled and compostable materials and waste in the development.
- 7.207 The Proposed Development will minimise where possible, and not increase, sources of noise and vibration during the operational phase of the development. Dust and other air pollution will also be minimised during construction, enforced through the Considerate Contractors Scheme (CCS). Based on the air quality assessment carried out, the development is air quality neutral. Additionally, all external lighting will be designed in compliance with the ILE guidance note.
- 7.208 A Preliminary Geo-Environmental Risk Assessment was carried out and given the potential contaminative previous use, an appropriate Asbestos Survey should be carried out prior to works commencing on site.
- 7.209 An ecologist assessed the site to be of limited ecological and biodiversity importance. Every effort has therefore been taken into consideration to create opportunities for attracting biodiversity and habitat to improve the site ecological value through the inclusion of trees and planting on the pedestrian level and rooftops. The site is achieving an Urban Green Factor of 0.29, and biodiversity net gain of over 6,000%.
- 7.210 The above sustainable elements within the proposed development have been assessed in found to be in compliance with national, regional and local planning policies with emphasis on the National Planning Policy Framework (NPPF), the New London Plan (March 2021), the Mayor's Sustainable Design and Construction SPG (2014) and the emerging City of Westminster's City Plan 2019- 2040 including Part D of Policy 38 Sustainable Design Principles.

Energy

- 7.211 An Energy Statement has been prepared by WSP which sets out how the residential and non-residential components of the Proposed Development meet the required targets whilst maximising the potential carbon savings through the following provisions:

- Main heating to the development will be provided through connection to the existing area-wide West End Gate network fed by 1no. CHP and 4no. highly efficient gas fired boilers.
- A highly efficient building fabric;
- Efficient building services plant, including providing high efficiency air handling plant with heat recovery and low specific fan power;
- 100% low energy lighting and maximised use of LED and low energy fixtures;
- The WEG energy centre serving the Proposed Development has been future proofed for future connection to the Church Street district heating network.
- Heat and cooling within the CAT A non-residential areas provided by all electric ASHPs, WSHPs.
- Roof mounted PV panels.

7.212 It is proposed for the development to connect through to the existing West End Gate energy centre, which has the capacity to power PGPS in addition to WEG Phase 1 and 2. The energy centre remains future-proofed for connection to the wider Church Street District Heating Network should it come forward, with the connection infrastructure having been installed already as part of the basement development at WEG.

7.213 When reviewing the Energy Hierarchy of LEAN, CLEAN, GREEN when compared to Part L 2013 using SAP 2012 carbon factors, the proposed development will achieve a 35% carbon reduction for the residential and non-residential elements of the scheme (compared to each respective baseline), giving a 35% reduction across the whole proposed development. The shortfall to being carbon neutral is met through a required offset payment.

7.214 London Plan Policy SI2 'Minimising Greenhouse Gas Emissions' is met and exceeded with the residential element of the scheme meeting the GLA "Be Lean" target achieving a minimum 10% improvement on Part L 2013 from energy efficiency measures. Furthermore, the non-residential element of the scheme exceeds the GLA "Be Lean" minimum target of 15% improvements over Building Regulation, achieving an overall reduction of 22% in carbon emissions from energy efficiency measures.

7.215 As such, the proposed strategy has been developed in compliance with adopted London Plan policy SI 2 as set out above, achieving 35% on site reduction in carbon emissions, while adhering to the 'Be lean, be clean, be green' energy hierarchy, and reaching zero carbon aspirations through a carbon offset payment for the shortfall beyond the 35% on site reduction.

7.216 Consequently the proposal is also in accordance with Draft Westminster City Plan policy 36 Energy, which promotes zero carbon development and expects all development to reduce on-site energy demand and maximise the use of low carbon energy sources to minimise climate change effects. The policy goes on to state that proposals should follow the principles of the Mayor's energy hierarchy, and that major developments

must connect to existing or planned local heat networks wherever feasible, all of which is met through this proposal.

Transport Assessment

- 7.217 A Transport Assessment (TA) has been carried out by Arup which details the site location and proposals, compliance with Healthy Streets, vision Zero and the Mayors Transport Strategy principles in line with relevant policy.

Healthy Streets Approach

- 7.218 The development is proposed to be car free, with the exception of the required disabled parking spaces in accordance with the London Plan 2021 and WCC City Plan Policy 27. Residents and visitors to the scheme are therefore likely to travel sustainably using the wide range of public transport services available near to the site, as well as walking or cycling in accordance with the Mayor's Transport Strategy (2018).
- 7.219 The design and layout of the site prioritises active and sustainable travel. New direct, high quality and attractive new pedestrian and cyclist access points will be created into the site, increasing the permeability of the site and improve connections to the wider area.
- 7.220 Internal routes within the site also incorporate the principles of 'safe streets' within the Vision Zero Action Plan (2018). The routes will provide a pleasant walking environment, prioritising pedestrians, with reduced clutter and high quality hard and soft landscaping. Furthermore, the TfL Safer Junction scheme will upgrade the Edgware Road / Harrow junction, reducing the likelihood of collisions with vehicles at crossings, as well as creating a better and safer environment for pedestrian and cyclists.

Car parking

- 7.221 The car park is located in at basement level B1 directly under the ground floor slab. Access to the car park is via the vehicle ramp which is entered via Church Street, into and through the existing WEG basement, to which the PGPS development connects.
- 7.222 The scheme is car free with 18 accessible parking spaces provided at basement level for both residential and commercial uses. This represents a 3% provision in line with London Plan policy T6.1. These spaces also include compliant electric vehicle charging points in line with the same policy. The remainder of the scheme is car free, which is in line with the residential standards set out in London Plan table 10.3, which supports car free development (as a maximum standard) in the CAZ and areas with excellent public transport accessibility (PTAL 5-6), which applies to the PGPS site. It is anticipated that car club membership provisions will be included for residents as part of the legal agreement associated to the development, also in accordance with policy T6.1.
- 7.223 As such the development being car free promotes sustainable transport in line with other policy objectives, focussed on the promotion of cycling, walking and existing public transport network, all of which is significant either as proposed through the development or in relation to existing infrastructure associated to the site and surrounds.

Cycle parking

- 7.224 The total provision of cycle parking is set out below in table 7.1. The short stay spaces are in line with London Plan policy T5 however there is a circa 10% shortfall (104 spaces) in the number of required residential cycle spaces.
- 7.225 As the scheme forms the third phase of the Masterplan of WEG and the basements of both schemes adjoin, it is proposed to accommodate the shortfall of long stay cycle spaces (104 spaces) within the WEG basement development. This will be secured via an amendment application to the WEG scheme.

Table 7.1: Short and long cycle spaces

Land Use	Long Stay	Short stay
Residential	878	15
Flexible commercial (retail)	7	60
Office / workspace	75	11
Total	960	86

- 7.226 Long stay secure cycle spaces and disabled car parking spaces are to be located within basement level -1. Cycle access to the basement is via Harrow Road and Newcastle Place and vehicle access is via Church Street. In addition to the cycle spaces, changing and showering facilities will be provided for the occupiers of the office and commercial functions within the building, as promoted within London Plan policy T5.
- 7.227 Short stay cycle spaces will be provide through the provision of Sheffield stands at ground level on street an in the public realm. A proportion of long-stay cycle parking will also be Sheffield stands to allow the use of larger or adapted cycles.
- 7.228 Long and short stay cycle parking is provided in line with London Plan, draft Westminster City Plan policy, and Cycle Design standards guidance. This form of transport is actively encouraged as a sustainable and active travel mode.

Public transport

- 7.229 The site has the highest possible Public Transport Accessibility Level (PTAL) at 6b indicating the site has 'excellent' connectivity to the surrounding networks.
- 7.230 The site has two bus stops is close vicinity on Edgware Road and Harrow Road with additional bus stops within a 5 minute walking distance.
- 7.231 The Edgware Road Underground stations are located 200m (Bakerloo Line), and 450m (Hammersmith & City, Circle and District Lines) to the east and southeast of the site.
- 7.232 London Paddington railway station, with the nearest entrance point 650m from the site, provides services operated by Great Western Railway, Heathrow Express and TfL Rail. London Marylebone railway station is located approximately 800m to the east of the site.

7.233 Crossrail Ltd plans to bring the Elizabeth Line into passenger service in the first half of 2022 which will serve Paddington Station. The new line will provide provide connection from Paddington to Heathrow, Reading to the west and Abbey Wood to the east. Services are expected to operate at approximately 34 trains per peak hour.

7.234 The nearest station entrance to Paddington from the site is via Paddington Basin, located approximately 650m away. The station is step-free between the platforms and street level; and provides an interchange between the London Underground services.

Vehicular access

7.235 Vehicles can access the basement car park (consented as part of WEG) for parking and deliveries. Alternatively Newcastle Place will be 'stopped up' to have controlled access for taxi or car drop-offs/pick-ups and residential deliveries. No parking is permitted on Newcastle Place.

Stopping up of Newcastle Place

7.236 It is proposed to 'stop-up' Newcastle Place which is currently Westminster adopted public highway. This road has already been subject to a temporary stopping up order since September 2020 (for one year and subject to monthly review) to facilitate construction works for WEG.

7.237 The stopping up of Newcastle Place will allow the carriageway and footways to be realigned, a high quality landscaped public realm space to be provided, and to accommodate the development. Through the public consultation feedback, improvements to the public realm in this area of the site were a high priority and a key concern. The proposals are therefore seeking to directly address this. It is proposed that Newcastle Place will remain one-way westbound for vehicles, and the public will be able to access the space.

7.238 The proposed function of Newcastle Place will remain unchanged and the traffic flows will be low. The proposal will control vehicular access and discourage through movements, to give priority to pedestrian and cyclists in the public realm.

7.239 Further information on the existing and proposed operation of Newcastle Place and justification of stopping up is contained in Appendix D of The TA report.

TfL Safer Junctions Scheme

7.240 TfL commenced construction works of the TfL Safer Junctions scheme at the Edgware Road and Harrow Road junction in January 2020 with the works now complete.

7.241 The scheme aims to reduce road danger and eliminate collisions at the junction, and create safer streets for users to walk, cycle and use public transport. The proposal consists of widening of all pedestrian crossings at the junction, introducing a 20mph speed limit across the junction

Relevant WEG consents

7.242 The WEG consented scheme safeguarded land to enable future improvement works on Edgware Road. The TfL improvement works involve widening Edgware Road from one to two lanes and providing a raised table pedestrian crossing at Newcastle Place. These changes are incorporated into proposed layouts.

7.243 An on-street loading bay was consented on Newcastle Place as part of the planning application (ref: 16/12162/FULL) to relocate the drop off area and main entrance to Block A of WEG (known as Westmark Tower). This loading bay has been incorporated into proposed layout.

Healthy Streets Checklist

7.244 The proposed scheme has been assessed against the checklist which demonstrate that the proposals will improve the Healthy Streets Check score for all three streets surrounding the site, particularly evident on Newcastle Place. The detailed assessment is contained in Appendix F of the TA.

7.245 An Active Travel Zone (ATZ) desktop assessment has also been undertaken to appraise the key active travel routes to and from the site. Based on the identified key destinations, five key routes have been identified to capture the key destinations that are most likely to attract active travel trips for the ATZ assessment which are set out within the TA.

Delivery and Servicing Strategy

7.246 The proposed approach to deliveries and servicing is in keeping the principles at phase one and two of the WEG development. At WEG, a basement servicing area is provided, accessed from Church Street. A further on-street loading bay is provided on Newcastle Place immediately to the Westmark building for residential deliveries.

7.247 All commercial deliveries and refuse collection to take place in the WEG level -2 basement level. Any special residential deliveries or residential move in / move out activities can also be pre-booked in the basement.

7.248 Ad-hoc residential deliveries will take place on-street on Newcastle Place. Vehicular access will be controlled to help enforce pedestrian priority through the landscaped street. The consented on-street loading bay for Westmark will be reconfigured but retained. Two further loading locations are proposed. This has been developed in consideration of Westminster Draft City Plan policy 29 Freight and Servicing, which requires needs to be met within the development site, through a combination of basement level servicing and integrated discreet ground floor service bays to minimise impact on the public realm.

Construction Access and vehicles

7.249 Construction access has been considered in detail in terms of minimising impact on local streets, and taking into account junctions with banned turns and restricted space for manoeuvring large vehicles. The proposed access strategy was discussed with TfL and WCC at a meeting on 26th February 2021.

7.250 It is proposed that access to the site will be from the A404 Harrow Road. Three construction site vehicular gates are proposed, with only two in operation at any one time, which will be marshalled to minimise risks of conflicts with pedestrians. The western gate (closest to Paddington green) will be for entry and the eastern gate (closest to Edgware Road) will be for exit. The locations of the gates aim to maximise stacking capacity within the site and minimise any potential risk of queuing on the public

highway. Swept path analysis and further information is contained in the outline/framework Construction Logistics Plan (CLP).

- 7.251 The western gate by Paddington Green will require the temporary closure of the stairs to the underpass. However, the step-free ramp will remain open and pedestrian diversion signs will be provided.
- 7.252 The location of the gate locations do not affect the operation of the bus stops along Harrow Road.
- 7.253 The highest number of vehicles in one week is predicted at this time to be 56. Berkeley has advised that the peak number of daily vehicles should be circa 29. This level of vehicle movement is not expected to have a perceptible impact on the highway network. Measures to minimise the impact of construction are set out in the outline CLP.

Air Quality

- 7.254 Ramboll have undertaken an air quality assessment to understand the significant air quality effects that may arise from the demolition and construction stage and the completed development stage of the proposed development.
- 7.255 During the demolition and construction stage, there is the potential that emissions of dust arising from the site could result in a loss of amenity at nearby existing residential and commercial properties.
- 7.256 Based on recognised assessment criteria, the demolition and construction works present a high risk of adverse dust impacts in the absence of appropriate mitigation. With the implementation of suitable mitigation measures, which have been set out within the submitted Environmental Statement, it is anticipated that dust impacts would be appropriately mitigated resulting in, as a maximum, temporary, medium-term **Slight Adverse** effects which would be **Not Significant**.
- 7.257 Predicted generation of HGV movements during the demolition and construction stage has been estimated to increase local flows by a maximum of five vehicles per day. Such an increase would have an insignificant impact on air quality. Construction traffic would also be controlled through relevant conditions relating to Construction Managements and logistics. As such traffic emissions generated by the demolition and construction stage would have a temporary, with appropriate mitigation.
- 7.258 The development would be car-free, with the exception of minimal disabled parking provision and therefore, together with servicing trips, the total vehicle trip generation for the site would be minimal and therefore the effects of the proposed development traffic emissions would be not significant. Overall, the air quality effects of the proposed development on existing off-site receptors would be permanent, long-term **Negligible Adverse** and **Not Significant**.
- 7.259 Concentrations of NO₂, PM₁₀ and PM_{2.5} have been predicted at new sensitive receptor locations within the proposed development. At the new residential receptors introduced by the proposed development, air quality is predicted to meet all relevant air quality objectives and therefore the proposed development would not introduce new receptors into an area of poor air quality.

- 7.260 To ensure appropriate mitigation is provided to those units where façade concentrations are predicted to exceed the World Health Organization guideline (brought into future regulations by 2030), it is recommended that prior to commencement of construction, an up-to-date assessment with the latest monitoring data and modelling tools is submitted to establish the baseline conditions at the time of construction and determine the need for mitigation in the form of PM2.5 filtration. The updated assessment could be secured by means of an appropriately worded planning condition.
- 7.261 The air quality neutral assessment has shown that the proposed development would meet both the building and transport emissions benchmarks and can be considered Air Quality Neutral, which is in accordance with Westminster Draft City Plan Policy 32 Air Quality, which requires major development to be air quality neutral. Mitigation measures will include ground floor landscaping and screening which seek to deliver air quality benefits within the public realm.

Noise Assessment

- 7.262 The site has been assessed from a noise perspective to understand the effect of noise sources on the proposed residential development (as the most noise-sensitive of the proposed uses) have been assessed in line with BS8233:2014 and Professional Practice Guidance (ProPG) on Planning and Noise developed by the Institute of Acoustics (IOA) and the ANC Acoustics, Ventilation and Overheating Residential Design Guide. This is set out in the Environmental Statement Technical Appendix 8.5.
- 7.263 The report concludes that the internal ambient noise levels are predicted to fall below the required target level. On the basis that these requirements are secured by planning condition, the proposed development would be acceptable for residential use and the effects would be minimal in line with draft Westminster City Plan policy 33 Local Environmental Impacts (part C specifically).
- 7.264 The proposed external amenity spaces are provided by way of private recessed balconies and communal amenity areas, particularly the rooftop of Blocks J and K.
- 7.265 The ambient noise levels predicted on the rooftop terraces are predominantly <55dB i.e. the BS8233 target for busy urban areas / adjoining a major transport network. Therefore, all residents would have access to amenity spaces with suitable noise levels.
- 7.266 A proportion of the balconies are predicted to experience noise levels in excess of the 55dB target for urban areas. However, with the proposed embedded mitigation set out in the acoustic chapter of the ES, which includes screening provided by the recessed nature of the balconies, and the inclusion of balustrades delivers predicted attenuation of at least 5dB. It should also be noted that, residents would have access to additional amenity areas such as the rooftop terraces and Paddington Green within 5 minutes' walk, providing further mitigation.
- 7.267 Taking into account the urban location of the site and the open balconies provided within the adjacent WEG and 14-17 Paddington Green schemes, external noise levels of up to 65 dB are considered appropriate for the proposed development based on the site context and levels that are fairly common to Westminster and the Central London location as set out in the acoustic report in the ES.

7.268 In addition, the proposed stopping up of Newcastle Place would deliver local environmental benefits by controlling vehicular access, which is then beneficial for local air quality and noise impacts in line with Westminster draft City Plan policy 33.

Statement of Community Involvement

7.269 A Statement of Community Involvement report has been prepared by Concilio which sets out the consultation process and objectives, key themes that have emerged from discussions with various key stakeholders and the local community, the response and feedback and summary of changes.

7.270 Numerous stakeholder meetings have taken place virtually since August 2020, along with the creation of a consultation website which set out the proposals via exhibition boards and accepted comments. Formal consultation and webinar events were also held virtually.

7.271 The consultation strategy has sought to engage with a wide range of stakeholders, including locally elected politicians, community groups, residents and visitors to the area using a range of communication methods. The digital nature of the consultation, virtual events and survey responses have been well viewed and easily accessed

7.272 Two phases of consultations were undertaken in order to ensure an iterative approach to engagement, genuinely seeking to understand the views of the local community and where possible incorporating these views into the emerging proposals.

7.273 The principle of redeveloping the site to complete the WEG Masterplan has been supported throughout the process, as have the significant public realm improvements and the affordable housing contribution.

7.274 Following initial pre-application discussions with WCC and the GLA and the initial consultation event, the proposals for the site have evolved. The following revisions have been made:

- The height of the tallest Block (K) was reduced to 32 storeys (from 39 storeys), reducing the number of units to 556.
- Increased number of larger family sized homes for socially rented families.
- An enlarged community space which is to be provided as an affordable workspace;
- Improved pedestrian and cycle connectivity and entrances
- Improvement to public realm which goes beyond the site legal boundary to provide high quality public areas. This was a top priority for survey respondents. The applicant and team continue to work with TfL and WCC to discuss and improve the proposals.
- Ensure the development is a car-free scheme and contain as much servicing within the basement to reduce congestion on roads.
- Creation of an enhanced ground floor through new flexible commercial space designed to activate the area.

- Focus on sustainable development with inclusion of triple glazing to reduce energy consumption, high-quality air filtration for residents and an increase in bio-diversity.
- Better lighting throughout the development along with better connections creating natural surveillance.

7.275 Through this collaborative approach, the scheme has evolved and a wide variety of comments have been able to be taken on board. Engagement with the local community and stakeholders will continue following the formal planning submission and throughout the planning process.

8. CIL and Planning Obligations

- 8.1 The Community Infrastructure Levy (CIL) Regulations 2010 (as amended) set the legal framework for the application of planning obligations deemed necessary to make a development acceptable in planning terms, in the context of the Community Infrastructure Levy (CIL) now being the main method in which infrastructure should be funded from development.
- 8.2 Regulation 122 of the CIL Regulations 2010 (as amended) states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.

Community Infrastructure Levy

- 8.3 Westminster's CIL charging schedule sets differential rates for use classes and different areas of the City. The site falls within the 'Residential core' charging zone, for which liable residential floorspace is charged at £400/sqm, and liable commercial floorspace is charged at £150/sqm.
- 8.4 The Mayor of London Community Infrastructure Levy 2 Charging Schedule came into effect on 1 April 2019, and in Westminster (within Band 1) a flat rate of £80 per sqm is set for all uses (except for office, retail and hotel in Central London and for health and education in all of Greater London. Office use is set at £185/sqm and retail is £165/sqm.
- 8.5 A CIL 'additional information' form is submitted with this application, setting out the existing and proposed floor space figures relevant to calculating the liable amount relating to the Proposed Development.

Planning obligations

- 8.6 The City Council is restricted on the use of planning obligations through regulation 122 of the CIL Regulations 2010 (as amended) relating to items of infrastructure, and has published a draft replacement Planning Obligations SPD which sets out its approach to the use of planning obligations alongside CIL. This draft replacement SPD is however already out of date and a new SPD is expected following the adoption of the Draft City Plan.
- 8.7 It is envisaged that potential planning obligation Heads of Terms (HoTs) that are likely to form part of a Section 106 agreement with the Council. These HoTs may include obligations around the following:
- Affordable workspace provisions

- Affordable housing clauses relating to the on-site social and intermediate homes, with associated plans
- Provisions to assist in the delivery of nomination rights to off-site affordable housing
- Play space contribution
- Carbon offset contribution
- Highways and public realm works, including improvements to the pedestrian tunnel to Paddington
- Stopping up provisions, including walkways agreement, with associated plans
- Employment, training and skills
- Legal and monitoring fees

9. Public Benefits Summary

- 9.1 The NPPG includes a summary definition of what constitutes public benefits resulting from a proposal (Para 020 Ref ID:18a-020-20190723). The NPPG states that ‘public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF Paragraph 8. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be of a private benefit’.
- 9.2 Paragraph 8 of the NPPF (referenced above) is a sub-section to Chapter 2 ‘Achieving Sustainable Development’, which is the golden thread running through the NPPF, as set out throughout this Planning Statement. Paragraph 8 goes on to state that achieving sustainable development means that the planning system has three overarching objectives (summarised below):
- **Economic Objective** – to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth and innovation.
 - **Social Objective** – support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; fostering a well-designed and safe built environment, with accessible services and open spaces, to support health, social and cultural wellbeing.
 - **Environmental Objective** - To contribute to protecting and enhancing natural, built and historic environment, making effective use of land, improve biodiversity, use natural resources prudently, minimise waste and pollution, mitigate and adapt to climate change.
- 9.3 At the heart of the NPPF is the presumption in favour of sustainable development, as defined under Paragraph 11, which states that development proposals that accord with an up-to-date development plan should be approved without delay.
- 9.4 As set out through this Planning Statement, the Proposed Development at PGPS has been developed in accordance with what is a very up to date Development Plan, with a very strong level of policy compliance.
- 9.5 In heritage and conservation terms, it is acknowledged that the Proposed Development results in elements of less than substantial harm to the setting of identified heritage asset as detailed in Chapter 7. As such, in accordance with Paragraph 196 of the NPPF, the less than substantial harm should be weighed against the public benefits of the proposal, which are listed throughout this Planning Statement and summarised below, and at the same time do include a number of heritage and townscape benefits.
- 9.6 In short, the proposal delivers an exceptional range of economic, social and environmental benefits to the locality and Westminster more generally, which are considered to significantly outweigh the less than substantial harm to the heritage assets. They are further articulated and presented in detail in the accompanying Economic and Full Circle Assessment by Turley.

PGPS – Economic Benefits

- 9.7 The proposal will deliver a range of employment generating uses, comprising nearly 5,000 sqm of new office space, in addition to nearly 1,100 sqm of flexible commercial/town centre uses and over 300 sqm of affordable workspace. As set out in the accompanying Economic Assessment this will lead to the generation of significant new employment opportunities, equating to around 600 operational jobs in this new employment floor space, in addition to employment opportunities relating to the management of the site and individual buildings on top of this.
- 9.8 Of course in addition to job creation, the offices and other commercial uses will drive economic growth and economic output generally, contributing to the diversity of Westminster's economy, and that of the north west of Westminster. The site is currently designated as being part of the North Westminster Economic Development Area (NWEDA – however it will cease to be on adoption of the Draft City Plan), where economic growth and diversity is strongly encouraged.
- 9.9 The proposed affordable workspace has been specifically developed as a benefit to the local area, creating affordable space for local start-ups and businesses, while providing high quality space for innovation and collaboration.
- 9.10 Importantly, the construction phase will also deliver 450 jobs to the local area, while also providing apprenticeship and training opportunities, which will be crystallised through the submission of a formal employment and skills plan.
- 9.11 Separately, the introduction of a significant new worker and residential community at the site will drive and deliver additional spend to the local area including the Church Street/Edgware Road District Shopping Centre. Again this is articulated in the supporting Economic Assessment that forms part of the planning application.
- 9.12 The office and flexible commercial space will also drive business rates for the City of Westminster and Treasury, in addition to the New Homes Bonus generated by the significant housing delivery through the proposal.
- 9.13 In addition, the Proposed Development generates nearly £20million in Community Infrastructure Levy for investment in the local area and Westminster more generally.

PGPS – Social Benefits

- 9.14 The social benefits of the PGPS development are significant, focusing on the strategically significant level of housing delivery that is proposed, comprising 556 new homes to Westminster, representing 56% of one year's worth of Westminster's London Plan target for housing delivery. This includes 38% on site affordable housing as set out in this statement, in excess of policy requirements, with additional provisions for Westminster workers and residents to have access to MOPAC's wider off site provision.
- 9.15 The housing delivery supports the delivery of a mixed and balanced community as reflected in the housing mix and diversity of housing proposed. This includes significant private, social and intermediate housing, and a wide range of unit sizes including studio homes in the private residential element, and a policy compliant proportion of family

sized homes and wheelchair accessible and adaptable dwellings. All residents will benefit from private amenity space, and access to communal amenity spaces in the development, while also having access to private residential amenities.

- 9.16 The importance and benefit of PGPS extends well beyond its site boundary, and like West End Gate, is essential to facilitate the delivery of Westminster's Church Street Masterplan, particularly from a social aspect. PGPS will deliver significant affordable housing which is anticipated to be taken on by the City Council as decant accommodation for existing Church Street tenants, who will move to the new accommodation at PGPS. This will allow the Church Street sites to be redeveloped and the aspirations of the Church Street Masterplan to be delivered.
- 9.17 The residential offer is one of a scale and variety that is seldom seen in private sector led residential development in Westminster, and has been developed closely in line with policy and aspirations for this public land site.
- 9.18 Additional social benefits are delivered through the provision of the wider place making aspects of the Proposed Development which will support and foster health and wellbeing, including the landscaping, play space and public open space as detailed below, addressing and repairing the townscape and negative impact that the former secure police station had on the public realm and environment.
- 9.19 The proposed ground floor uses will also provide valuable local services for the local community, including shops and other uses, in addition to the affordable workspace, which is being developed in support of the local community as set out above.

PGPS – Environmental Benefits

- 9.20 Like Phase 1 and 2 of West End Gate, the environmental benefits that will be delivered through PGPS are significant, representing a continuation of what is being delivered at WEG, and being in line with the Council's aspirations for Church Street, the Edgware Road/Harrow Road junction, and for the stretch between the site and the Travis Perkins building in Paddington.
- 9.21 The proposal firstly will replace outdated and poor quality buildings that are a negative townscape feature with buildings of high quality sustainable design and architecture. The proposals will deliver both heritage and townscape benefits as set out in the accompanying Heritage Statement and within the ES, including to a number of views, and to the setting of Conservation Areas (including the Paddington Green Conservation Area) and Listed Buildings. This primarily results from the replacement of detracting, poor quality existing buildings with new buildings of high architectural quality.
- 9.22 The proposal will repair and address the significant shortcomings associated to the previous high security police station function of the site, and will deliver:
- High performing, sustainably designed buildings, connected to the existing energy centre at WEG.
 - Significant carbon reduction, air quality neutral, significant active and passive sustainability measures integrated into the design.

- Significant biodiversity net gain and urban greening.
- New pedestrian and cycle routes through and around the site, including between the three proposed blocks. Significantly improved legibility.
- On street cycle parking, off street cycle parking and facilities for residential and commercial uses. Off street servicing of the development.
- Car free development (aside from nominal disabled spaces), to the benefit of air quality and local environment.
- Stopping up of Newcastle Place and its realignment, and restriction on access limited to pedestrians, cycling and servicing.
- Significant new landscaping and greening to Newcastle Place including new seating, tree planting, lawns, water features and public art.
- Significant tree planting around the site – 121 additional trees, all 6 existing are retained.
- New public plaza on the corner of Edgware Road and Harrow Road in front of Block K, with associated planting, seating, and public realm.
- Private amenity space associated to each new home.
- Communal residential amenity space in the form of two roof top gardens.
- Communal amenity space for the future office tenants to Block J and K.
- Play space integrated into the public realm and open space being provided.
- Use of high quality materials around the site, with maintenance by the applicant.

9.23 As such, the environmental enhancements are comprehensive and wide ranging, and are incorporated into all aspects of the proposal, being inherent in the architecture and design, through to the systems and strategies being utilised, and the physical delivery and enhancement of the streetscape and public realm. The design has evolved from street level firstly, focussing on permeability, sustainable transport and place making.

Bullet Point Summary of Public Benefits

- 556 new homes in total.
- 210 affordable homes on site, 38% on site affordable housing provision comprising 60% intermediate and 40% social rented homes.
- Policy compliant affordable tenure mix, unit mix reflecting local need.
- Supporting the delivery of Church Street Masterplan.
- High quality new homes including private and communal amenity space, and residential amenities.
- Wheelchair accessible and adaptable homes.
- Affordable workspace for the local community.
- Significant new office space supporting over 400 jobs, as part of 650 site wide operational jobs.

- Apprenticeship, training and skills opportunities, over 450 construction jobs.
- New retail and town centre uses providing local services and employment opportunities.
- Increased spend in the local area, including to Church Street District Centre.
- Business rates generation for Westminster.
- Replacement of existing poor quality buildings and environment with high quality, sustainable buildings and environment.
- Associated Heritage and townscape benefits to the setting of several assets.
- Stopping up of Newcastle Place, provision of significant new public realm, landscaping and greening around the site, new seating and dwell/amenity spaces.
- New pedestrian routes through and around the site.
- New cycle routes through and around the site.
- Over 900 cycle parking spaces at basement level and in the public realm.
- Car free development, aside from disabled parking provision.
- Public art and new public spaces, a new plaza on the corner of Edgware Road and Harrow Road.
- Planting of over 120 new trees around the site, retention of all existing trees,
- New safe lighting and accessible, safe and inclusive environment.
- CIL Payment of nearly £20m.
- Play space contribution.
- 35% carbon reduction on site.
- Carbon offset contribution of over £1m to achieve carbon neutral.

10. Summary and Conclusions

- 10.1 The redevelopment and delivery of Paddington Green Police Station represents a significant opportunity for Westminster and the local Church Street Area, completing Berkeley's long held wider West End Gate Masterplan, the early phases of which are currently being delivered. The Masterplan represents Westminster's single largest housing site by some distance, and an opportunity for transformative placemaking to be delivered to the local area.
- 10.2 The opportunity at PGPS arises from the decommissioning of the former high security police station as part of the estate strategy from the MOPAC. This involves the disposal of surplus sites, and general reconfiguration and enhancement of the estate to best meet London's policing needs. As set out in this Planning Statement, the loss of the police station therefore complies with Westminster policy, and has been agreed with the Mayor of London. Replacement neighbourhood policing functions have been provided on Church Street adjacent to the site, while all other pan-London functions previously housed at PGPS have relocated to other parts of the estate.
- 10.3 The vacated surplus site therefore represents the opportunity for Berkeley to bring the site back into a viable use, and deliver of a transformative proposal that repairs the secure island site associated to the former use, demolishes the existing poor quality buildings, and delivers a residential-led mixed use redevelopment of the site that will deliver a range of public benefits that are of both strategic and local level importance.
- 10.4 The site is identified as one that is suitable for the location of a tall building, taking into account the site's context and setting, and its key gateway location on one of the key entry points into the centre of Westminster, while benefitting from exceptional public transport accessibility. This sets the framework for the delivery and optimisation of what is a key site for the delivery of Westminster City Plan and London Plan policy objectives, and for public land.
- 10.5 The proposed development has evolved through a comprehensive and lengthy process of public consultation and pre-application engagement. Through this process the height, bulk and massing of the proposal has evolved significantly, with the heights reduced by up to 10 storeys in some cases.
- 10.6 The overall approach to delivering the site has also evolved significantly, going from a two tower approach to one that breaks down the massing and the site much more considerably, to deliver the current proposal that comprises three buildings that respond to the setting and context of the site and surrounding area. Increased emphasis has been given to the ground floor and place making, resulting in a reduction of building footprints, an increase in permeability and introduction of new pedestrian and cycle routes through and around the site.

Planning Balance/Summary

- 10.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. As set out through this statement,

the scheme for PGPS has been developed in close consideration of the new London Plan and Draft Westminster City Plan, which provides an up to date development plan framework. The proposal meets and exceeds the requirements of a number of local and strategic level policies, and the associated public benefits being delivered through the scheme are considerable and wide ranging.

- 10.8 The NPPF states under Paragraph 11 that development proposals that accord with an up to date development plan should be approved without delay, while more generally Paragraph 8 sets out the golden thread of achieving sustainable development, and the three overarching objectives of the planning system, which is to deliver economic, social and environmental benefits. However, the extensive public benefits of the proposed scheme must be weighed against any harm.
- 10.9 At the same time, paragraph 196 relating to heritage and conservation states that where development proposals result in less than substantial harm to identified heritage assets, this harm should be weighed against the public benefits of the proposal. The Heritage Assessment forming part of this application identifies that the proposed development results in harm to the character and setting of an identified heritage asset, namely a Grade II Listed Terrace on Warwick Avenue.
- 10.10 Conversely, the Heritage Assessment and ES identify a number of heritage and townscape benefits delivered through the proposed development, resulting predominantly from the replacement of the existing detracting building with replacement buildings of high quality architecture. Townscape and Visual benefits are identified to a number of identified viewpoints, while Heritage benefits are delivered to the setting of the Paddington Green Conservation Area amongst other identified assets. More generally, the public benefits delivered through the proposed development are substantial and wide ranging as set out in the previous chapter and throughout this Planning Statement, and are considered to outweigh this identified heritage harm, which is considered to be at the low end of less than substantial.
- 10.11 The ES also acknowledges some impacts in relation to Daylight and Sunlight on certain neighbouring properties as a result of the proposed height, bulk and massing of the proposal, although reductions and retained values are largely appropriate for the context. The proposed heights also represent a diversion from Westminster's Draft Policy on appropriate height on the site, however those heights set out in policy represent the massing already present on the site, and if adhered to would not result in a deliverable or viable scheme, or result in the optimisation of the site and public sector land. The proposed heights have been developed in the context of detailed analysis of the surrounding built environment, and in close consideration of Westminster's tall building's policy as set out in this submission.
- 10.12 The design has evolved through the pre-application process and heights have been reduced significantly to address Westminster's concerns, however the GLA have always been fully supportive of proposed heights at all stages of the process. The architecture and design of the proposal has also evolved, to deliver landmark buildings of the highest quality sustainable design and architecture.
- 10.13 The heritage and other elements of harm should be balanced against the public benefits being delivered through the scheme. These are considerable and wide ranging as set out

in Chapter 9 of this Planning Statement for both the local area, primarily in relation to the delivery of Westminster's neighbouring Church Street Masterplan, and also at a strategic and London level.

- 10.14 The key elements revolve around the delivery of a strategically significant number of new homes, 556 in total, including 38% on site affordable housing, which is in excess of policy requirements. The housing choice is significant and diverse and has been developed in line with local need, comprising a range of private, social rented and intermediate homes, including family sized accommodation, wheelchair accessible units, in tenure blind buildings of high quality, sustainable architecture. The applicant has also worked with the GLA and MOPAC to secure nomination rights for Westminster residents and workers to MOPAC's wider portfolio of affordable housing delivery, principally in LB Barnet.
- 10.15 Fundamentally, the delivery of PGPS and the wider West End Gate Masterplan is essential for the delivery of Westminster's Church Street Masterplan. PGPS will provide affordable homes that will be taken on by Westminster for existing Church Street tenants, as is the case with West End Gate, which will free up sites within Church Street for redevelopment, while providing these residents with new, high quality homes adjacent to their current home.
- 10.16 The economic benefits of the scheme are also significant, delivering a substantial number of employment and training opportunities for the local and wider area through the construction phase, and also in the completed development through the proposed range of commercial uses which include offices, retail and other town centre uses. This will drive business rates and other benefits for Westminster, and also deliver significant additional spend to the Church Street/Edgware Road shopping centre from the resident and worker population at PGPS. The proposal also includes a significant affordable workspace unit for the local community and start-ups.
- 10.17 The environmental and wider place making benefits are potentially the most significant when considering the existing poor quality building and environment which is hostile and very 'hard', reflecting the former high security police function. The proposal will deliver high quality, sustainable buildings that will deliver townscape and heritage benefits, replacing the existing detracting poor quality buildings with high quality alternatives. The island site will be opened up through a pedestrian's first approach revolving around the stopping up of Newcastle Place, delivering new routes through and around the site for pedestrians and cyclists, connecting Edgware Road and Harrow Road through to the West End Gate site and Paddington Green importantly.
- 10.18 This will principally be delivered through the stopping up and significant landscaping to Newcastle Place. New lawns, seating, public art and other features will be delivered, while access will be for pedestrians, cyclists and servicing only, with no access for general traffic. New routes between buildings will be delivered providing further dwell spaces, while a new public plaza will be created on the corner of Harrow Road and Edgware Road, accompanied by significant greening, tree planting, seating and public realm improvements, complementing the active town centre uses that feature around the base of each building.

- 10.19 More generally the scheme is car free and promotes walking and cycling, will deliver significant carbon reduction on site in line with policy, connecting to the West End Gate energy centre which is future proofed for connection to the Church Street District Heating Network. The proposals deliver significant biodiversity net gain and urban greening, and delivers a range of private and communal amenity space for residents, alongside public open space and public realm.
- 10.20 On balance, it is considered that the public benefits are significant and wide ranging, of a scale that is rarely seen in Westminster, and that they outweigh the identified harm caused by the development, namely the identified lower end less than substantial harm to the Grade II Listed Terrace in Warwick Avenue. As such, in line with the NPPF it is considered that the proposals represent sustainable development in accordance with Local, Regional and National policy and should be supported.

Appendix 1: Tall Buildings Policy Assessment – Montagu Evans

Paddington Green Police Station
2 – 4 Harrow Road, London, W2 1XJ

Tall Buildings Policy Assessment

Montagu Evans

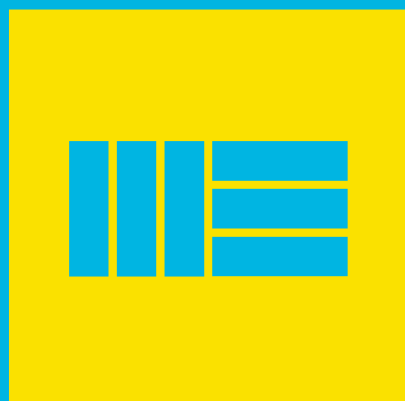
March 2021

Berkeley
Designed for life

PADDINGTON GREEN POLICE STATION

TALL BUILDINGS POLICY ASSESSMENT

26 MARCH 2021



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1.0 INTRODUCTION AND PURPOSE OF DOCUMENT

1.1 This Tall Buildings Policy Statement has been prepared by Montagu Evans LLP on behalf of Berkeley Homes (Central London) Ltd (“the applicant”) in support of an application for the redevelopment of Paddington Green Police Station, Harrow Road, Paddington, London W2 1XJ (“the site”). The site is located in the City of Westminster (“the Council”).

1.2 The description of development is:

“Demolition and redevelopment of the site to provide three buildings, providing private and affordable residential units (Class C3), commercial uses (Class E), flexible community/affordable workspace (Class E/F.1), provision of private and public amenity space, landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing and disabled car and cycle parking, connecting through to the basement of the neighbouring West End Gate development.” (“the proposed development”).

1.3 Our approach to the assessment of the acceptability of the proposed development started with an assessment of the suitability of the site for tall buildings given the site’s characteristics and the adopted planning policy related to the Site.

1.4 The site characteristics and existing poor public realm, its location adjacent to a significant junction between Edgware Road and the Westway, and its highly accessible location mean the site is at a point of urban significance, at the fringe of an area of emerging character in the environs of the Paddington Basin.

1.5 With regards to the policy position, and as indicated above, the site’s suitability for a tall building has been carefully considered through a thorough understanding of the applicable Development Plan Policies. The adopted policies of the statutory local plan (including the London Plan) and the London Plan (2021) support the optimisation of housing density at High PTAL sites and adjacent to public transport nodes. This was explicitly acknowledged by the GLA during pre-application discussions, and the nature and scale of the transformative change promoted by the applicant and the technical team throughout the pre-application consultation has been supported by the GLA.

1.6 The scale of the proposed development has been reduced in response to comments from the City of Westminster, and while the proposed scale exceeds what is specified at Policy 41 of the Draft City Plan, the Council has accepted that this would be acceptable if the scheme delivers exceptional public benefits. The Planning Statement prepared by Turley explains these exceptional public benefits.

1.7 The proposed development in terms of height and scale is an appropriate level and form of development for this significant site and will bring about transformative change in the area. Our assessment of the effects of the scheme has been carried out in accordance with principles on landscape and townscape assessments as set out in the Landscape Institute and Institute of Environmental Management and Assessment ‘Guidelines for Landscape and Visual Assessment – Third Edition’ (GLVIA) (2013).

1.8 The proposals have been subject to ES assessment and found to bring benefits to townscape and visual receptors and will minimise harm to heritage assets.

1.9 The site does not lie in any locally designated viewing corridors nor in strategic views as identified by the London View Management Framework (2012). The site does lie in the background of the LVMF view 4A.2 which has been tested as part of the visual impact assessment.

1.10 The proposed development is considered expressly against the criteria of the local tall buildings policies of the Westminster City Plan, emerging Westminster City Plan and the London Plan policy D9 (Tall Buildings) below.

2.0 VIEWS POLICIES

- 2.1 Below we provide an assessment of the acceptability of the proposed development in accordance with the policies of the Development Plan which concern views and visual amenity.
- 2.2 Our assessment of the effect on visual amenity from identified local and strategic viewpoints is included at Section 9.0 of the ES Volume. These viewpoints were agreed with the Council during the pre-application process.

LONDON PLAN (2021)

- 2.3 Policy HC3: Strategic and Local Views states that:
- A *Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly- accessible and well-used. The Mayor has designated a list of Strategic Views that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.*
 - B *Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.*
 - C *The Mayor will also identify strategically-important landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards strategically-important landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the protected vista.*
 - D *The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.*
 - E *The Major has prepared supplementary planning guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.*
 - F *Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.*
 - G *Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.*
- 2.4 Policy HC4 (London View Management Framework)
- A *Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where*

appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

- B Development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.*
- C Development proposals and external illumination of structures in the background of a view should give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well-preserved within its setting with clear sky behind, it should not be altered by new development in the foreground, middle ground or background of the view or the setting of a Strategically-Important Landmark should take into account the effects of distance and seasonal changes.*
- D Development proposals in designated views should comply with the following:*
- 1. London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from the panorama as a whole. The management of views containing Strategically-Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the Strategically-Important Landmark in the foreground, middle ground or background of the view.*
 - 2. River Prospects should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context*
 - 3. Townscape and Linear Views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.*
- E Viewing places should be accessible and managed so that they enhance people's experience of the view.*
- F Where there is a protected vista:*
- 1. Development that exceeds the threshold height of a Landmark Viewing Corridor should be refused*
 - 2. Development in the wider setting consultation area should form an attractive element in its own right and preserve or enhance the viewer's ability to recognise and to appreciate the Strategically-Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor*
 - 3. Development in the background should not harm the composition of the Protected Vistas, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation Area or not*
 - 4. Development in the foreground of the wider setting consultation area should not detract from the prominence of the Strategically Important Landmark in this part of the view.*

Westminster's City Plan (2016)

- 2.5 At the time of writing, Westminster's City Plan remains part of the Development Plan. It is anticipated that this will be superseded with the adoption of the Westminster City Plan 2019-2040.
- 2.6 Policy S26 (Views) states that

'The strategic views will be protected from inappropriate development, including any breaches of the viewing corridors. Similarly, local views, including those of metropolitan significance, will be protected from intrusive or

insensitive development. Where important views are adversely affected by large scale development in other boroughs, the council will raise formal objections. Westminster is not generally appropriate for tall buildings’.

Westminster’s City Plan 2019-2040 (Intend to Adopt)

2.7 Part F of draft Policy 40 (Townscape and architecture) relates to Westminster views, as follows:

“WESTMINSTER VIEWS F. New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible.”

2.8 The proposed development will not affect strategic viewing corridors or locally designated views. The tall buildings will necessarily be visible from local viewpoints owing to the nature of the surrounding townscape and the topography, and the scale of the proposed development. The form of the buildings, which are of varied heights, have been designed to maximise their slender proportions designed to reduce the impression and appearance of the new massing.

2.9 It is our judgment that there will be considerable improvements to local views of the site following the redevelopment of the police station, which is currently a detracting and disused feature in the streetscene, with new buildings of high quality design that deliver new commercial uses at ground floor level and new public realm in the environs of Newcastle Place.

2.10 Key to our analysis of the proposals has been the potential for effects on the Paddington Green Conservation Area (CA). The CA is characterised by a range of mansion blocks and 19th century developments focussed on the landscaped public open space at Paddington Green, which has a strong urban park character. Views through and out to the south of the CA are sensitive and have been the subject of views analysis and townscape assessment (see in particular views 16, 17, 18 and 32).

2.11 It is judged that views towards the site at ground level would be improved through the addition of high quality architecture. The surrounding context has undergone significant regeneration in recent years, and the proposed uses of the development are complementary to those in the CA. The additional activity and new architecture on the Site, where this is currently a detracting element in the setting of the CA, would be an improvement in this context. The visibility of the proposed development from some locations within the CA will not affect the intrinsic qualities which comprise its character and appearance.

2.12 The proposed development would not affect any recognised silhouettes, Strategically Important Landmarks or Landmark Viewing Corridors. It would appear as part of the wider development in one LVMF Vista (4A.1, Primrose Hill), but outside the viewing corridor, and the viewpoint is orientated to the south-west towards the site, so that the principal landmarks, including St Paul’s Cathedral and the Palace of Westminster are not visible in the frame of view. The proposed development would be experienced as part of the existing urban development which characterises this part of the view. Our ES assessment finds that the effect would be negligible, owing to the limited nature of the change to the scene as a whole, and the character and composition of the view would be preserved.

2.13 Overall the ES assessment finds no adverse effects on visual amenity or visual receptors. The proposed development is therefore consistent with London Plan Policies HC3 and HC4, Westminster Policy S26 and draft Policy 40.

3.0 TALL BUILDING POLICIES

- 3.1 Below we provide an assessment of the acceptability of the proposed development in accordance with the policies of the Development Plan which concern tall buildings.
- 3.2 Our assessment of the effect on townscape character and visual amenity has been informed by the analysis carried out in volume 2 of the ES Volume.

LONDON PLAN (2021)

Policy D9: Tall Buildings

- 3.3 This policy sets out a list of criteria which will be utilised to determine the acceptability of tall buildings within Greater London. Below, we provide a response to each limb of the policy.

'Locations

B

- 1) *Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.*
 - 2) *Any such locations and appropriate tall building heights should be identified on maps in Development Plans.*
 - 3) *Tall buildings should only be developed in locations that are identified as suitable in development plans.*
- 3.4 The Site is located adjacent to but outside the Paddington Opportunity Area (OA); so London Plan Policy SD1 (Opportunity Areas) does not apply to the Site. The Harrow Road/Westway forms the northern boundary of the OA. An extract of the map of the OA from the Westminster City Plan is shown at our Figure 1. This marks the West End Gate scheme (now under construction) as a Proposal Site to the north of the OA; the Police Station is located between this and the OA.
- 3.5 The Site is located with the North Westminster Economic Area, which includes 4 of the 5 most deprived wards in Westminster. Of relevance to the proposals, Westminster Policy S12 encourages development that improves the quality and tenure mix of housing, addresses the severance caused by the Westway (A40) and Harrow Road (A404) and improves public realm.
- 3.6 Part C of Draft Policy 42 of the Intend to Publish City Plan identifies that tall buildings may be acceptable at the Marylebone flyover/ Edgware Road junction and the Housing Renewal Areas. The site is located in both of these areas. The detail of Policy 42 is addressed in more detail below.

PADDINGTON OPPORTUNITY AREA

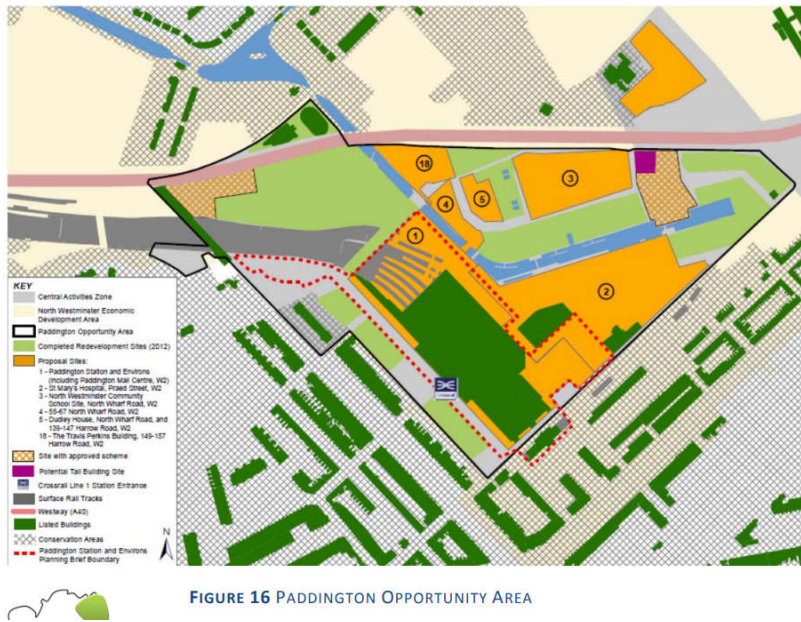


FIGURE 16 PADDINGTON OPPORTUNITY AREA

Figure 1. Extract from Westminster City Plan, Paddington Opportunity Area (p.49)

Impacts

C

1) Visual impacts

a. The views of buildings from different distances:

- i. Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.
- ii. Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
- iii. Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height of parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

b. Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c. Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan

d. Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives

have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

- e. Buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it*
- f. Buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river*
- g. Buildings should not cause adverse reflected glare*
- h. Buildings should be designed to minimise light pollution from internal and external lighting*

3.7 The visual impact of the proposals is discussed in full above. Parts e and f of the policy are not relevant as the Site is not situated in the Thames Policy Area or in the setting of a World Heritage Site.

3.8 The proposed redevelopment will result in transformative change to the character and activities on and in the immediate environs of the site, as encouraged and promoted through the West End Gate masterplan. The comprehensive approach to the redevelopment and the scale of the change means there will inevitably be some effects on townscape and visual receptors. These have been rigorously tested through the pre-application process and through the formal visual assessment of the scheme both on local and strategic viewing corridors, looking at local, middle and long range views as required by London Plan Policy D9.

3.9 The existing building at Paddington Green Police Station is 17 storeys, and set within the West End Gate Masterplan, where buildings range in height from 4-30 storeys. To the north of the site are several Westminster owned tall buildings including Parsons House on Edgware Road, in addition to Kennet House on Church Street, and the taller buildings that mark the wider Edgware Road/Harrow Road junction. This is set out in greater detail in the Design and Access Statement by Squire & Partners.

3.10 The Paddington Basin to the south culminates in the Merchant Square development, at 41 storeys. The increase in height in this area provide an opportunity to provide an appropriate response to the context, marking a gateway of metropolitan importance, where the Edgware Road, one of the main routes north (and a Roman road), meets the Westway, one of the main routes west. We consider therefore that the proposals meet the salient elements of Part C 1(b) of the Policy D9.

2) Functional impact

- a. The internal and external design, including construction detailing, the building's materials, and its emergency exist routes must ensure the safety of all occupants*

3.11 Evacuation from all buildings is via stairwell, and protected refuges for the mobility impaired are included. As set out at Section 5.22 of the Design and Access Statement, all residential building cores will be fire fighting cores, including fire fighting stairs, lifts and wet risers, and will be accessible for fire tenders from Newcastle Place. The Fire Statement by H+H provides a full account of the measures taken to provide safety.

- b. Buildings should be serviced, maintained and managed in a manner that preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and buildings management arrangements should be considered at the start of the design process*

3.12 The proposals have been developed in liaison with the Westminster Highways and Design Case Officers. It is proposed that the retail is served from the basement loading bay accessed from Church Street, and the management company will organise the facilities operationally.

- c. *Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas*
- 3.13 The landscaping at the site has been designed to provide a permeable environment at ground level, with active retail frontage at ground floor and natural surveillance from glazed common areas in the residential blocks. Enhancement to the streetscape at Newcastle Place will facilitate circulation, including at peak times.
- d. *It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building*
- 3.14 The area has a PTAL of 6a, which is the highest level. The design has been developed with an emphasis on pedestrian and cycling routes, with generous footways and cycle stands for short-stay, in accordance with TfL London Cycling Design Standards. Drop-off bays have been incorporated to facilitate day-to-day servicing of the development.
- 3.15 The new public realm provides links to Edgware Road, a popular transport hub.
- e. *Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area.*
- 3.16 The proposed development forms part of the masterplan at West End Gate, which seeks to comprehensively deliver estate renewal and regeneration, delivering more homes, an improved shopping centre and public realm.
- 3.17 During pre-application consultation, it was noted that the housing mix should respond to the requirements of supporting the Church Street Estate Regeneration project, which is the intention.
- f. *Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on adjoining buildings*
- 3.18 An important objective of the proposals is to improve the quality of the streetscape and the way the buildings relate to the streetscape at ground level throughout the site, and the mix of appropriate uses that will help to generate this active street frontage.
- 3.19 The new ground floor frontages will bring the activity to the front of the site and improve the relationship with the area of improved public realm at Newcastle Place. The orientation of the tallest building on the corner has been considered to step down the massing toward the more sensitive Paddington Green frontage, and to respond to the landmark position of this element of the site, adjacent to the flyover and Edgware Road.
- 3.20 Our assessment has found that the potential townscape effects arising from the redevelopment of this site are beneficial, arising through the introduction of new high quality architecture and public realm, replacing unrelieved hardstanding and the existing police station, which detracts from the existing streetscene, providing a hostile frontage which currently detract from the way the area appears and functions.
- 3.21 The arrangement of the proposed development has been designed to offer public spaces and pedestrian routes that would respond to the immediate and future context of the Housing Regeneration Area.
- 3.22 The proposals would improve the permeability and the quality of the public realm offer across the site through improved public realm and landscaping, including at Newcastle Place, making a marked contribution to public amenity space, and encouraging use and activity in a heavily urbanised part of the town centre.

- 3.23 The edges of all roads have been considered in the landscaping to maximise trees and create green buffers from the traffic. Communal amenity spaces are to be located within the centre of the site and to roof terraces to minimise the impact of noise.
- 3.24 The proposals introduce appropriate and accessible ground floor uses, which, alongside public realm (discussed separately above) would ensure the Site's better integration into the local street network and improve its permeability.
- 3.25 The proposed development would not interfere with telecommunications or aviation, and the Council has agreed that this could be scoped out of the ES as a result.

3) *Environmental impact*

- a. *Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building*
 - b. *Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions*
 - c. *Noise created by air movements around the building(s), servicing machinery or building uses, should not detract from the comfort and enjoyment of open spaces around the building*
- 3.26 The proposed development is more dense and taller than the existing buildings on the site and will therefore have environmental effects as a result. The site enjoys daylight conditions, and there is a significant gap between the site and development at the Paddington Basin, due to the Westway/A40. The London Plan policy requires consideration to be given to all effects on microclimate, including wind and effects on daylight/sunlight and these have been tested and set out in the relevant Chapters submitted with the ES.
- 3.27 The proposal will not result in significant overshadowing.
- 3.28 The prevailing wind at the Site comes from the south west, and the new development has been reviewed at street level and entrances to predict the requirement for mitigation measures. This has informed the design of the proposals.
- 3.29 The location of street trees and green buffers has been carefully considered to mitigate against the noise pollution arising from the proximity to Edgware Road and the A40. Communal amenity spaces have been located in the middle of the Site to minimise the impact of noise.
- 3.30 All efforts have been taken to mitigate and reduce the environmental effects of the proposals such that no unacceptable impacts arise from the scale and location of tall buildings in this location.

4) *Cumulative impacts*

- a. *The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting*
- 3.31 The Environmental Statement includes a thorough assessment of the proposals in conjunction with cumulative schemes identified through the scoping process. There are no unacceptable cumulative impacts arising from the proposed development.

Public access

D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

- 3.32 The proposed development incorporates new public realm at Newcastle Place, which will form part of an enhanced green, urban context. Within the West End Gate masterplan, the proposed development is not of notably greater scale or prominence. No public access is proposed within the tall buildings because it is not considered appropriate given the residential use of the buildings.

WESTMINSTER POLICIES

Westminster's City Plan 2019-2040 (Intend to Adopt)

- 3.33 The emerging City Plan 2019-2040 was declared sound by the Planning Inspectorate on 19th March 2021, and the Council will now proceed towards formal adoption at the next meeting of Full Council.
- 3.34 The Council's website notes that '*given the advanced stage in the plan-making process, all policies in the City Plan 2019-2040 will therefore now carry significant weight as a material consideration when Westminster City Council carries out its duty under s.38(6) of the Planning and Compulsory Purchase Act 2004.*' The pre-application feedback from the Council also indicates that by the time the application is determined it is likely that the new City Plan will be adopted, so have referred to the draft Policies.
- 3.35 We have therefore carried out an assessment of the acceptability of the proposals against the salient policies of the Intend to Adopt draft of the plan, below.
- 3.36 This version of the Plan incorporates modifications recommended by the Inspectors following the Examination, which removed reference to Key Development Sites, and modified the wording of the site specific Policy 42 in relation to Marylebone Flyover/ Edgware Road Junction (where the site is located).

Draft Policies

Policy 41 (Building Height)

A Tall buildings are defined as buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline. In all locations proposals for tall buildings will need to satisfy both the general principles in Clause B and relevant locational principles in clauses C and D (and for Housing Renewal Areas, Policy 42).

General Principles

B Proposals for tall buildings will be required to:

- 1. Be proportionate to the role, function and importance of the location in terms of height, scale, massing and form; and*
- 2. Achieve exceptional architectural quality and innovative and sustainable building design from all viewpoints and directions; and*

3. *Create an attractive and legible streetscape that takes account of the use of the public realm for a variety of uses and includes active uses at ground floor level; and*
4. *Enhance the character and distinctiveness of an area without negatively affecting valued townscapes and landscape, or detracting from important landmarks, heritage asset, key views and other historic skylines and their settings; and*
5. *Mitigate negative impacts on the microclimate and amenity of the site and surrounding area; and*
6. *Avoid unacceptable impacts on aviation and telecommunications; and*
7. *Provide publically accessible viewing platforms at the roof of the building (for any exceptionally tall buildings).*

Locational Principles

- C Development of tall buildings may be acceptable within the Paddington Opportunity Areas, Victoria Opportunity Areas, Marylebone flyover/ Edgware Road junction and the Housing renewal areas. Provided in the first instance they comply with the general principles under Clause B. These principles need to be cross-referenced against the area specific design principles set out below, and for the Housing Renewal Areas, policy 42 and with site-specific guidance set out in the forthcoming Site Allocations Development Plan Document.*

MARYLEBONE FLYOVER / EDGWARE ROAD JUNCTION

Tall buildings may be appropriate at the junction of the flyover and Edgware Road but must be designed to relate to and complement each other and help to frame this area as a gateway junction. The height of any tall building in this location must step down significantly from, and be subordinate to, those in the Paddington Basin cluster. They must also be slender and elegant in their form. The acceptability of a tall building proposed in this area depends on the quality of its design, reflecting its role as a local landmark. The prevailing context height in this area is 6 residential storeys (20m) but as it sits within a varied context. Tall buildings of 2 to 3 times the context height may be appropriate.

Policy 42: Building height in the housing renewal areas

- A Delivering large scale public estate regeneration comes with viability challenges that are different to private development, such as decanting of existing residents and a higher affordable housing requirement. While the design principles for these estates remains paramount and any scheme must adhere to the general building height principles in Policy 41B, what is considered an appropriate height must be balanced against the wider public benefits the scheme is able to viably deliver.*
- B The Church Street/ Edgware Road Housing Renewal Area and Ebury Bridge Estate Housing Renewal Area have been identified for renewal and there are opportunities for taller buildings here where they contribute to the creation of a place with a strong and enhanced character and:*
1. *On Ebury Bridge Estate respect the setting and views from the surrounding Georgian and Victorian terraces within the adjacent conservation areas; have the tallest element towards the northern end of the area marking Ebury Bridge and the crossing of the railway line, with building heights stepping down from this location.*
 2. *On Church Street/ Edgware Road Housing Renewal Area are at the main east-west route and the commercial focus for the area; and are delivered in the heart of the regeneration scheme as part of a comprehensive approach.*

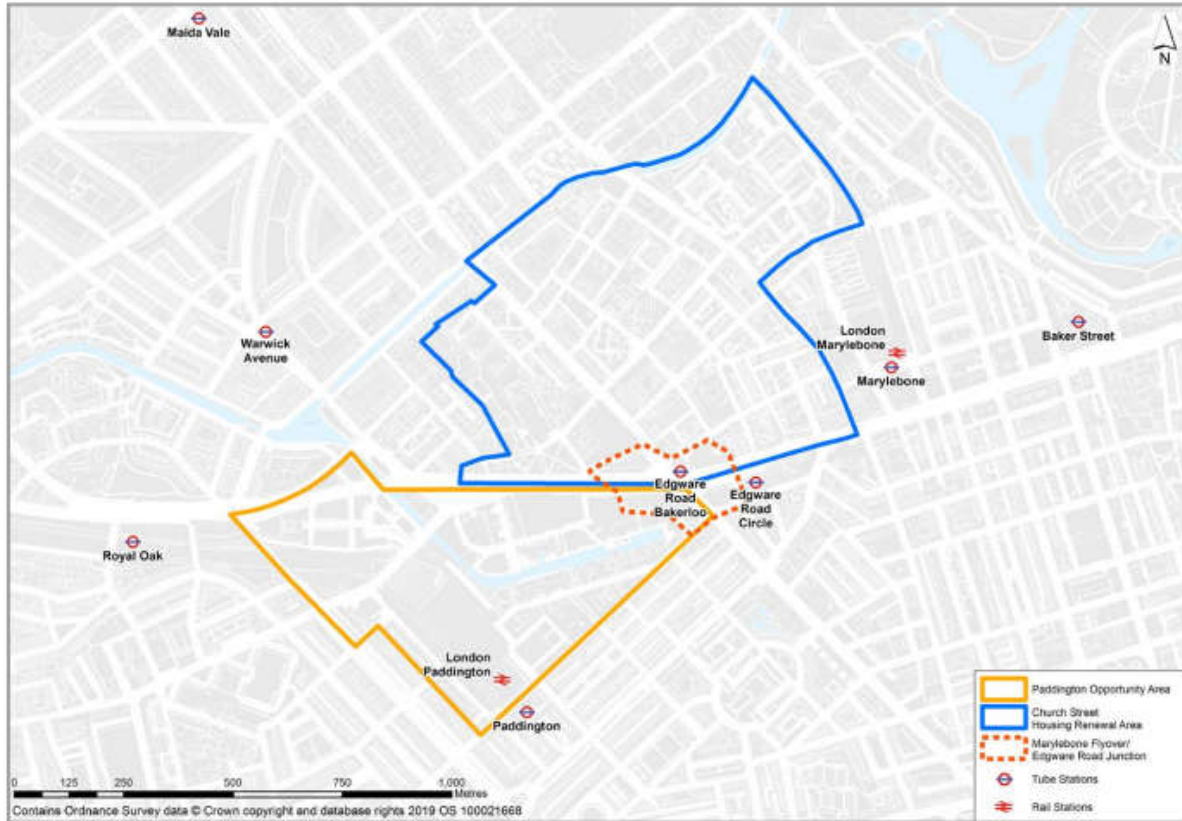


Figure 37: Paddington Opportunity Area, Marylebone flyover / Edgware Road junction, Church Street Housing Renewal Area

Figure 2. Extract from Intend to Adopt City Plan, March 2021, p. 163. This illustrates the site within the Church Street Housing Renewal Area and Marylebone Flyover/ Edgware Road Junction policy area.

- 3.37 Most of these general policy requirements in Policy 41 replicate those of the London Plan (2021) and are discussed in response to London Plan Policy D9 (Tall Buildings) above, so are not repeated here.
- 3.38 In relation to the criteria on the Marylebone Flyover/ Edgware Road Junction, the design of the Blocks I and K the tall buildings, has been given careful consideration to relate both to the existing West End Gate scheme, and to the existing and emerging tall buildings in the Paddington Basin Opportunity Area.
- 3.39 The proposed development would have a family resemblance to the existing West End Gate scheme, so that it would form part of the same character area. Block J, in a mansion block idiom, steps down in height to reduce the adverse effects on daylight/sunlight to West End Gate. The tallest building, Block K (32 storeys), is located at the junction, which is of metropolitan importance, where one of the main historic routes north (the Edgware Road), meets a major route west (the Westway), to mark the gateway to central London. Block I (18 storeys) steps down to Paddington Green, to respect the more sensitive heritage setting to the west.
- 3.40 Block K (32 storeys) steps down significantly in height from Merchant Square, which contains a 41 storey tower, so remains subordinate to those in the Paddington Basin cluster.

- 3.41 Policy 41 specifies a height of up to 18 storeys on the site. Blocks I (18 storeys) and K (15 storeys) are within this height limit. Block K is 32 storeys so exceeds this limit. We note that the height of Block K has been significantly reduced as result of pre-application engagement with the Council, and that the original proposal for 42 storeys was considered acceptable by the GLA. Paragraph 4.18 of the Intend to Adopt City Plan identified that any deviation from the identified height ranges must be robustly justified by demonstrating the general principles in the policy have been met in full, which this report provides. The Planning Statement produced by Turley sets out the considerable public benefits of the proposed development, which also justify the deviation from this aspect of Policy 41.

Westminster's City Plan (2016)

- 3.42 The 2016 City Plan does not contain any tall buildings policies.

'Saved' policies of the Unitary Development Plan ('UDP'), (2007)

- 3.43 Policy DES 3 (High Buildings) states that:

'A High buildings (defined as being that which is significantly higher than its surroundings) will not be permitted where the development:

- 1. Would intrude upon strategic views (as defined by Policy DES14) or upon the setting of the Palace of Westminster or upon Westminster Abbey World Heritage Site*
- 2. Would have an adverse impact upon the character of designated conservation areas (DES9) or upon listed buildings and their settings (DES10) or upon the views (DES15) obtained from the following areas:*
 - a. The London Squares*
 - b. The Royal Parks*
 - c. The Grand Union Canal*
 - d. The Thames Spatial Policy Area*
- 3. Would be incongruous with respect to the prevailing character of the area within which it would be located'.*

- 3.44 The effect of the Proposals on visual amenity is discussed above, and assessed within the ES Volume. There would be no effect on protected viewing corridors, or upon the World Heritage Site or Thames Policy Area.

B Existing high buildings in Westminster shall not set a policy precedent for similar development on adjacent sites and any new high buildings, if permitted as an exception to Policy DES 3(A) shall satisfy most of the following design criteria:

- 1. The quality of architectural design embodied in the proposal would visibly contribute to the character of London as a 'world class' city, and*
- 2. Enhance the long-distance skyline of Central London by their profile, aspect ratio and choice of facing and glazing materials, and*
- 3. The relevant employment opportunities and housing capacity created by the proposal shall be within the existing or planned future capacity of the public transport and highway networks; and*
- 4. The development shall provide a favourable mix of land use which would facilitate shorter journeys to work, energy consideration and support other sustainability objectives.*

C High buildings which may be exceptional permitted on the basis of Policy DES3 (B) shall contribute to the improvement or the regeneration of the locality within which they would be sited and should satisfy all the following detailed criteria in their siting and detailed design. They should:

- 1. define and landmark points of significant urban activity and accord with the scale and character of urban grain and street frontage lengths, existing open space, planting and other topographical features, and*
- 2. serve to enhance area accessibility and local pedestrian movement by design at ground level and by the provision of open space and active frontages at street level, and*
- 3. Secure an enhancement of the local public realm and publically accessible areas by the provision of high quality landscaping treatment, and*
- 4. minimise the effects of overshadowing and overlooking, especially within predominantly residential areas and avoid the effects of wind turbulence and other adverse microclimatic impact, and*
- 5. ensure that on-site vehicle parking provision and movement is restricted to underground areas as far as possible, and*
- 6. have no adverse impact upon telecommunications channels and air traffic control and movements.*

3.45 The considerations set out at parts B and C of the policy are broadly consistent with those in the more recent Draft Policy 41 of the emerging Local Plan, considered above.

3.46 The proposed development has been carefully considered to integrate into the emerging West End Gate masterplan, and minimises adverse impacts to heritage, townscape and visual receptors. An important aspect of the scheme is the delivery of improved public realm at Newcastle Place, and the replacement of an unattractive, impermeable building with a new, high quality development. The taller element, at the junction of Edgware Road and the flyover, marks the location of a significant gateway into north London.

3.47 The active frontages at ground floor level will enliven the Paddington Green frontage and improve the relationship with the area of new public realm.

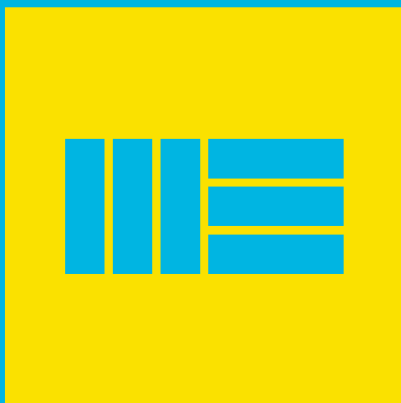
3.48 We consider that the proposed development would meet the policy requirements at Saved Policy DES3.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.

Appendix 2: Submission document list

Covering letter

- Planning Application Form
- CIL ' Additional Information' Form
- Payment of the statutory application fee of £92,687 plus £25 admin charge is made directly to the Planning Portal
- Site Plan and Site Location Plan, prepared by Squire & Partners
- Existing and Proposed Plans, Elevations, Sections, Demolition Plans and accompanying drawings register, prepared by Squire & Partners
- Design and Access Statement (DAS), including Landscaping strategy and associated plans, prepared by Squire & Partners
- Structural Statement (Chapter within DAS), Prepared by WSP
- Illustrative drawings containing plans and elevations, prepared by Squire & Partners
- Area schedule, prepared by Squire & Partners
- Unit mix schedule, prepared by Squire & Partners
- Planning Statement prepared by Turley (this document)
- Heritage Statement, prepared by Montagu Evans
- Daylight and Sunlight Report, Prepared by GIA
- Energy Assessment, prepared by WSP
- Sustainability Statement, prepared by WSP
- BREEAM Pre-assessment and Matrix prepared by AESG
- Drainage Strategy Report, prepared by WSP
- Transport Assessment, prepared by Arup
- Arboricultural Report, Tree Fabrik
- Code of Construction Practice Appendix A, Berkeley Homes
- Statement of Community Involvement, prepared by Concilio
- Ventilation Statement, prepared by WSP

- Waste Management Strategy, prepared by Squire & Partners
- Lighting Strategy, prepared by Squire & Partners
- Biodiversity Net Gain, prepared by Ramboll
- Health Impact Assessment, prepared by Ramboll.

Non-Technical Summary (NTS);

Volume 1: Main Environmental Statement;

1. Introduction;
2. EIA Process and Methodology;
3. Alternatives and Design Evolution;
4. Proposed Development Description;
5. Demolition and Construction Description;
6. Socio-Economics;
7. Air Quality;
8. Noise and Vibration;
9. Wind Microclimate;
10. Daylight, Sunlight, Overshadowing and Solar Glare;
11. Cumulative Effects;
12. Summary of Residual Effects and

Glossary of Terms and Abbreviations

Volume 2: Townscape, Visual and Built Heritage Assessment (TVBHA);

- Technical Appendix 1.1: Legislation and Policy
- Technical Appendix 1.2: AVR Methodology
- Technical Appendix 1.3: Map of Townscape Receptors
- Technical Appendix 1.4: Map of Heritage Receptors
- Technical Appendix 1.5: Zone of Theoretical Influence

- Technical Appendix 1.6: Map of Viewpoint Locations
- Technical Appendix 1.7: List Entry Descriptions

Volume 3: Technical Appendices

- Technical Appendix 1.1: IEMA Quality Mark Checklist
- Technical Appendix 1.2: Regulation 18(5)(b) Statement
- Technical Appendix 2.1: EIA Scoping Opinion Request Report
- Technical Appendix 2.3: Avison Young EIA Scoping Independent Review
- Technical Appendix 2.3: EIA Scoping Opinion
- Technical Appendix 2.4: Ecological Impact Assessment
- Technical Appendix 2.5: Ground Conditions Preliminary Risk Assessment
- Technical Appendix 2.6: Archaeological Desk Based Assessment
- Technical Appendix 2.7: Flood Risk Assessment Statement
- Technical Appendix 2.8: Transport Data
- Technical Appendix 6.1: Socio-Economic - Planning Policy and Legislation
- Technical Appendix 6.2: Socio-Economic - Magnitude Thresholds
- Technical Appendix 6.3: Pupil and Net Capacity Forecast Data
- Technical Appendix 6.4: Socio-Economic Cumulative Schemes Details
- Technical Appendix 7.1: Air Quality Legislation, Policy and Guidance
- Technical Appendix 7.2: EHO Consultation
- Technical Appendix 7.3: Model Inputs and Results Processing Tools
- Technical Appendix 7.4: Air Quality Background Concentrations, Transport Data and Model Verification
- Technical Appendix 8.1: Noise and Vibration Legislation and Policy
- Technical Appendix 8.2: Baseline Noise and Vibration Survey
- Technical Appendix 8.3: Construction Noise Assumptions
- Technical Appendix 8.4: Transport Data

- Technical Appendix 8.5: Site Suitability Assessment
- Technical Appendix 10.1: Drawings
- Technical Appendix 10.2: Daylight and Sunlight Assessment (Surrounding Properties);
- Technical Appendix 10.3: Daylight and Sunlight Assessment (West End Gate and Merchant Square)

Appendix 3: WEG Masterplan full planning history

Application reference	Description of development	Decision and date
15/07737/EIAOP	Request for a scoping opinion pursuant to Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2011 as Amended in 2015 (the EIA Regulations) in connection with the proposed redevelopment of the West End Green Site, Paddington.	Permitted 24 September 2015
15/11677/FULL	Redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 652 residential units (including 126 affordable housing units), landscaping and associated car and cycle parking. This application is accompanied by an Environmental Impact Assessment (EIA) (Revised Description)	Permitted 28 April 2016
16/08442/NMA	Amendments to planning permission dated 28 April 2016 (RN: 15/11677) for redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4, and B1), up to 652 residential units (including 126 affordable housing units), landscaping and associated car and cycle parking. Namely, internal alterations to all floors of Blocks and C. Amendments proposed to the unit mix on floors 1-10 of Block A at ground floor of Block C and all floors of Blocks G and H. Amendment to include an additional bay of private residential balconies on floors 1-10 of the south facing elevation of Block A. Reduction in the footprint of block C.	Permitted 4 October 2016
16/10019/NMA	Amendments to planning permission dated 28 April 2016 (RN: 15/11677/FULL) for redevelopment to provide buildings of between ground + 6 and ground and 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 652 residential units (including 126 affordable housing units), landscaping and associated car and cycle parking. This application is accompanied by an Environmental Impact Assessment (EIA) (Revised Description). Namely, alteration to	Permitted 9 November 2016

	internal residential layouts, building footprint and exterior of Block D.	
16/07226/FULL	Variation of Condition 1 of the planning permission granted 28 April 2016 (ref: 15/11677/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 652 residential units (including 126 affordable housing units), landscaping and associated car and cycle parking. NAMELY, incorporation of 283 Edgware Road into site, extension of Block B to provide 20 additional residential units (672 in total), with associated swap in housing tenure with Blocks E and F, associated amendments to permitted public realm and landscaping strategy.	Permitted 27 January 2017
17/02701/NMA	Amendments to planning permission dated 27 January 2017 (RN: 16/07226/FULL) for: Variation of Condition 1 of the planning permission granted 28 April 2016 (ref: 15/11677/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 652 residential units (including 126 affordable housing units), landscaping and associated car and cycle parking, namely incorporation of 283 Edgware Road into site, extension of Block B to provide 20 additional residential units (672 in total), with associated swap in housing tenure with Blocks E and F, associated amendments to permitted public realm and landscaping strategy. NAMELY optimisation of consented internal residential layouts to all floors of Block B and to vary the wording of planning conditions 49 and 34 in order to make them achievable and better address their original intention.	Permitted 24 April 2017

16/12162/FULL	Variation of Condition 1 of the planning permission granted 27 January 2017 (ref: 16/07226/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 672 residential units (including 130 affordable housing units), landscaping and associated car and cycle parking. NAMELY, amendment to the façade of Block A, and ground floor arrangement of Block A including residential drop off and ancillary residential uses, with associated amendment to landscaping plan.	Permitted 24 May 2017
16/11562/FULL and 16/11563/LBC)	Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide buildings ranging between 4 and 14 upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. This application is accompanied by an Environmental Impact Assessment (Linked to application RN: 16/11563/LBC)	Permitted 21 December 2017
17/11430/NMA	Amendments to planning permission dated 24 May 2017 (RN: 16/12162) for Variation of Condition 1 of the planning permission granted 27 January 2017 (ref: 16/07226/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 672 residential units (including 130 affordable housing units), landscaping and associated car and cycle parking. NAMELY, amendment to the facade of Block A, and ground floor arrangement of Block A including residential drop off and ancillary residential uses, with associated amendment to landscaping plan. Namely, amalgamation of 1 x 3 bed and 1 x 2 bed (on the 11th floor) to 1 x 4 bed unit, 1 x 3 bed and 3 x 2 bed (on the 20th floor) to 1 x 3 Bed and 1 x 6 Bed (no change in number of bedrooms) and 1 x 3 bed (on the 23rd floor) to 1 x 2 bed.	Permitted 18 January 2018

18/03836/NMA	Amendments to planning permission dated 21 December 2017 (RN: 16/11562) for: Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide buildings ranging between 4 and 14 upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. This application is accompanied by an Environmental Impact Assessment. NAMELY, reconfiguration of the ground floor and Newcastle Place elevation of Block H to accommodate a double transformer substation room.	Permitted 06 June 2018
18/05466/NMA	Amendments to planning permission dated 24 May 2017 (RN: 16/12162) for: Variation of Condition 1 of the planning permission granted 27 January 2017 (ref: 16/07226/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 672 residential units (including 130 affordable housing units), landscaping and associated car and cycle parking. Namely, amendment to the façade of Block A, and ground floor arrangement of Block A including residential drop off and ancillary residential uses, with associated amendment to landscaping plan. NAMELY, optimisation of internal layouts, the introduction of additional bays of inset balconies on the 9th and 10th floor and unit configurations which will result in an alteration to the unit mix within Block C and an overall increase of 4 unit numbers across the whole West End Gate development.	Permitted 28 June 2018
18/05592/NMA	Amendments to planning permission dated 24 May 2017 (RN: 16/12162) for: Variation of Condition 1 of the planning permission granted 27 January 2017 (ref: 16/07226/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 672 residential units (including 130 affordable housing units), landscaping and associated car and cycle parking. Namely, amendment to the façade of Block A, and ground floor arrangement of Block A including residential drop off and ancillary residential uses, with associated amendment to	Permitted 26 July 2018

	landscaping plan. NAMELY, reconfiguration of ground floor, removal of one side entrance canopy and reduction and redesign of front main canopy.	
17/11433/NMA	Amendments to planning permission dated 27 January 2017 (RN: 16/07226) for variation of Condition 1 of the planning permission granted 28 April 2016 (ref: 15/11677/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 652 residential units (including 126 affordable housing units), landscaping and associated car and cycle parking. Namely, incorporation of 283 Edgware Road into site, extension of Block B to provide 20 additional residential units (672 in total), with associated swap in housing tenure with Blocks E and F, associated amendments to permitted public realm and landscaping strategy. NAMELY, reduction and reconfiguration of basement levels 1 and 2.	Permitted 18 January 2018
18/07090/NMA	Amendments to planning permission dated 21 December 2017 (RN: 16/11562) for: Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide buildings ranging between 4 and 14 upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. This application is accompanied by an Environmental Impact Assessment (Linked to application RN: 16/11563/LBC). NAMELY, removal of condition 47 which relates to the Code of Construction Practice, as this is covered in the provisions of the legal agreement.	Permitted August 2018
19/00329/FULL	Use of part of ground floor of Blocks C and D as offices (Class B1) for a temporary period of five years.	Permitted 14 Mar 2019

<p>18/08004/FULL and 18/08110/LBC</p>	<p>Variation of condition 1 of planning permission dated 21 December 2017 (RN: 16/11562/FULL) for the Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide buildings ranging between 4 and 14 upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. NAMELY, to allow addition of one floor of residential accommodation to Block G and to parts of Block H to add 16 residential units and to reduce carbon offset payment to allow connection to Church Street District Heating Scheme.</p>	<p>Permitted 29 March 2019</p>
<p>19/04991/NMA</p>	<p>Variation of Condition 1 of the planning permission granted 27 January 2017 (ref 16/07226/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2,A3, A4 and B1), up to 672 residential units (Including 130 affordable housing units), landscaping and associated car and cycle parking. Namely, amendment to the facade of Block A, and ground floor arrangement of Block A Including residential drop off and ancillary residential uses, with associated amendment to landscaping plan. NAMELY, to provide four extra residential units, addition of canopies to the residential entrances to Blocks B, D and E/F, internal layout changes to Blocks D and E/F and facade amendments to Blocks B, D and E/F.</p>	<p>Permitted 14 October 2019</p>
<p>19/07777/NMA</p>	<p>Amendments to planning permission dated 24 May 2017 (RN 16/12162) for variation of Condition 1 of the planning permission granted 27 January 2017 (RN 16/07226/FULL) for a redevelopment to provide buildings of between ground and 6 and ground and 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), amendment to the facade of Block A, and ground floor arrangement of Block A including residential drop off and ancillary residential uses, with associated amendment to landscaping plan, NAMELY, to revise the wording of Condition 48 to read, "The retail (A1 to A4) units hereby approved shall only accommodate uses within Use Class A1 to A4 of the Town and Country Planning (Use Classes) Order 1987 (as amended). You must not use it for any other</p>	<p>Permitted 4 November 2019</p>

	purpose, including any change of use permitted by The Town and Country Planning (Use (General Permitted Development) (England) Order 2015 (or any order that may replace it)."	
20/05082/NMA	Amendments to planning permission dated 24 May 2017 (RN: 16/12162/FULL) for: Variation of Condition 1 of the planning permission granted 27 January 2017 (ref: 16/07226/FULL) for a redevelopment to provide buildings of between ground + 6 and ground + 29 storeys including commercial space (Class A1, A2, A3, A4 and B1), up to 672 residential units (including 130 affordable housing units), landscaping and associated car and cycle parking. NAMELY, to allow the conversion of 20x 1-Bed Intermediate units into 20x 1-Bed Social Rent units on levels 1 - 10 within Block B, and conversion of 6 x 1-bed units from social rented to intermediate tenure within blocks E/F.	Permitted 16 December 2020
20/05083/NMA	Amendments to planning permission dated 29 March 2019 (RN: 18/08004/FULL) for the: Variation of condition 1 of planning permission dated 21 December 2017 (RN: 16/11562/FULL) for the Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide buildings ranging between 4 and 14 upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. NAMELY, to allow revision of tenure to block H amend 6x 1-Bedroom units across the ground to third floors within Block H from Social Rented to Intermediate tenure.	Permitted 16 December 2020
20/05083/NMA	Amendments to planning permission dated 29 March 2019 (RN: 18/08004/FULL) for the: Variation of condition 1 of planning permission dated 21 December 2017 (RN: 16/11562/FULL) for the Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide buildings ranging between 4 and 14	Permitted 16 December 2020

	<p>upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. NAMELY, to allow revision of tenure to block H amend 6x 1-Bedroom units across the ground to third floors within Block H from Social Rented to Intermediate tenure.</p>	
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Appendix 4: Area Schedule

Appendix 5: Unit mix Schedule

Type	Open Market				Intermediate				Social			
	HR	Units	% by unit	n. by HR	HR	Units	% by unit	n. by HR	HR	Units	% by unit	n. by HR
Studio	1	32	9%	32	1	0	0%	0	1	0	0%	0
1 Bed	2	107	31%	214	2	82	65%	164	2	8	10%	16
2 Bed	3	102	29%	306	3	44	35%	132	3	41	49%	123
	2B3P	13	13%		2B3P	24	55%		2B3P	0	0%	
	2B4P	89	87%		2B4P	20	45%		2B4P	41	100%	
3 Bed	4	98	28%	392	4	0	0%	0	4	34	40%	136
	3B5P	17	17%						3B5P	19	56%	
	3B6P	81	83%						3B6P	15	44%	
4 Bed	5	7	2%	35	5	0	0%	0	5	1	1%	5
	Total	346		979	Total	126		296	Total	84		280
											Total Units	556

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