

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

# Health Impact Assessment

**Ramboll**

March 2021

Intended for

**Berkeley Homes (Central London) Limited**

Date

**March 2021**

Project Number

**1620009008**

# **PADDINGTON GREEN POLICE STATION HEALTH IMPACT ASSESSMENT**

Project No. **1620009008**  
Issue No. **Final**  
Date **31/03/2021**  
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#### **Version Control Log**

Revision	Date	Made by	Checked by	Approved by	Description
1	31/03/2021	MT	BS	MW	Issue for Client Comment
Final	31/03/2021	MT	MW	MW	Issue for Planning

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# 1. INTRODUCTION

## 1.1 Overview

Ramboll UK Limited ('Ramboll') was commissioned by Berkeley Homes (Central London) Limited (the 'Applicant') to undertake a Health Impact Assessment (HIA) for the proposed residential-led redevelopment of a site located at 2-4 Harrow Road, Paddington, London, W2 1XJ (the 'site').

This assessment has been prepared in connection with the full application submitted to Westminster City Council (WCC) for the redevelopment of the site. The redevelopment proposals comprise the demolition of the existing Paddington Green Police Station (PGPS), excavation of a two-level basement connecting to the neighbouring West End Gate (WEG) development, and the delivery of residential, office and flexible commercial floorspace, parking, access arrangements, and associated landscaping (the 'proposed development').

## 1.2 Objective of Assessment

Health is defined by the World Health Organisation (WHO)<sup>1</sup> as the state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity.

HIA has been defined by the Department of Health (DoH)<sup>2</sup> as: "...a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population".

In HIA, impacts on the health and wellbeing of various people or communities are identified in two main ways by asking the following questions:

- What are the direct effects on health?
- What are the indirect effects mediated through the determinants of health, such as employment, housing conditions, community cohesion and social support, and access to services and amenities?

HIA identifies the positive and negative impacts of a proposed development on human health, and identifies ways to mitigate any negative impacts, and potentially enhance positive impacts to address health inequalities. The HIA provides the context of the site constraints and the aspects of the proposed development which are relevant to health. Descriptions of where the design of the proposed development has considered health are provided within the assessment. Where further measures are required to enhance positive impacts, recommendations have been made.

The report has been informed by the environmental impact assessment that has been undertaken of the proposed development as reported in the ES that accompanies the application.

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<sup>1</sup> World Health Organization, 2020. World Health Organization Constitution. Accessed on 05/10/2020. Available at: <https://www.who.int/about/who-we-are/constitution>

<sup>2</sup> Department of Health, 2010. Health Impact Assessment of Government Policy: A Guide to carrying out a Health Impact Assessment of new policy as part of the Impact Assessment Process [online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/216009/dh\\_120110.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/216009/dh_120110.pdf)

## 2. POLICY CONTEXT

### 2.1 Policy and Legislative Context

The following documents have been used to inform the assessment:

- National Planning Policy Framework (NPPF)<sup>3</sup>;
- Planning Practice Guidance (PPG)<sup>4</sup>;
- The London Plan, 2021<sup>5</sup>;
- The Mayor's Transport Strategy, 2018<sup>6</sup>;
- Culture and Night-Time Economy Supplementary Planning Guidance (SPG), 2017<sup>7</sup>;
- Social Infrastructure Supplementary Planning Guidance (SPG), 2015<sup>8</sup>;
- Active Design, 2015<sup>9</sup>;
- Accessible London: Achieving an Inclusive Environment SPG, 2014<sup>10</sup>;
- The Control of Dust and Emissions During Construction and Demolition SPG, 2014<sup>11</sup>;
- Play and Informal Recreation SPG, 2012<sup>12</sup>;
- Affordable Housing and Viability SPG, 2017<sup>13</sup>;
- Shaping Neighbourhoods: Accessible London: Achieving an Inclusive Environment SPG, 2014<sup>14</sup>;
- Shaping Neighbourhoods: Character and Context SPG, 2014<sup>15</sup>;
- Westminster City Council Open Space Strategy<sup>16</sup>
- Westminster City Council City Plan, 2016<sup>17</sup> and accompanying Policies Maps;
- Westminster City Council Draft City Plan 2019 – 2040 (2020<sup>18</sup>).

The site is located in the North Westminster Economic Development Area (adopted Policy S12), which seeks to tackle deprivation and deliver economic growth, improvements in housing choice and housing stock.

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<sup>3</sup> Ministry of Housing, Communities and Local Government, 2019. The National Planning Policy Framework [online]. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>4</sup> Ministry of Housing, Communities and Local Government, 2020. Planning Practice Guidance [online]. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>5</sup> Greater London Authority, 2021. The London Plan Spatial Development Strategy for London [online]. Available at: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

<sup>6</sup> Greater London Authority, 2018. Mayor's Transport Strategy, London.

<sup>7</sup> Greater London Authority, 2017. Culture & the Night-Time Economy, Supplementary Planning Guidance. London.

<sup>8</sup> Greater London Authority, 2015. Social Infrastructure Supplementary Planning Guidance. London. GLA.

<sup>9</sup> Sport England, 2015. Active Design. London.

<sup>10</sup> Greater London Authority, 2014. Accessible London: Achieving an Inclusive Environment, Supplementary Planning Guidance. Implementation Framework. London.

<sup>11</sup> Greater London Authority, 2014. The Control of Dust and Emissions During Construction and Demolition, Supplementary Planning Guidance. London.

<sup>12</sup> Greater London Authority, 2012. Play and Informal Recreation Supplementary Planning Guidance. London. GLA.

<sup>13</sup> Greater London Authority, 2017. Affordable Housing and Viability Supplementary Planning Guidance. London. GLA.

<sup>14</sup> Greater London Authority, 2014. Shaping Neighbourhoods: Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance. London. GLA.

<sup>15</sup> Greater London Authority, 2014. Shaping Neighbourhoods: Character and Context Supplementary Planning Guidance. London. GLA.

<sup>16</sup> Westminster City Council, 2007. City of Westminster Open Space Strategy. WCC - Departments of Environment and Leisure and Planning and City Development. London. WCC.

<sup>17</sup> Westminster City Council, 2016. Westminster City Plan, London. . Adopted November 2016.

<sup>18</sup> Westminster City Council, 2020. Draft City Plan 2019-2040. London. WCC.

## 3. SCOPE AND STRUCTURE OF ASSESSMENT

### 3.1 Approach

The HUDU Model provides a 'rapid', standardised and transparent method for assessing potential contribution and health infrastructures requirements for new developments. The HUDU checklist helps to create healthy sustainable communities and to ensure that new developments are planned with human health in mind.

The HUDU checklist, or assessment matrix used in this instance, aims to promote healthy urban planning by ensuring that the health and wellbeing implications of local plans and major planning applications are consistently taken into account. By bringing together planning policy requirements and standards that influence health and wellbeing, the checklist seeks to mainstream health into the planning system.

The assessment matrix does not identify all issues related to health and wellbeing but focuses on the built environment and issues directly or indirectly influenced by planning decisions. It is generic and should be localised for specific use. Not all the issues or assessment criteria may be relevant, and the user is encouraged to prioritise specific actions which focus on key impacts.

The scope of the rapid HIA included a desktop appraisal, a document analysis and an appraisal of the development proposals.

The desktop appraisal involved establishing the policy context and the current health baseline from a range of publicly available on-line resources. Baseline conditions have been established using published databases, maps, technical reports and assessments within the ES and other planning submission documents.

The document analysis involved a review of topic specific planning application documents to understand how health and wellbeing have been considered and designed within the proposed development. The following documents were considered:

- Environmental Statement (ES);
- Design and Access Statement (DAS);
- Energy Statement; and
- Biodiversity Net Gain Assessment.

This was followed by an appraisal of the potential human health impacts likely to arise from the proposed development.

#### 3.1.1 Technical Scope

The HIA has considered a range of lifestyle, social, community, environmental, economic, access and service determinants of health. A scoping exercise was undertaken to identify the determinants of health that would have the potential for likely significant population health effects. The scoping exercise was informed by the nature of the proposed development and what could realistically and reasonably be secured and delivered as part of the proposed development by the Applicant. The determinants of health were based upon the Wales Health Impact Assessment Support Unit (WHIASU) HIA Guidance<sup>19</sup>.

These determinants were then scoped into the assessment, as presented in Table 3.1.

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<sup>19</sup> WHIASU. Health Impact Assessment: a practical guide. Cardiff, Wales: Wales Health Impact Assessment Support Unit. 2012.

<b>Table 3.1: Scoping of Health Determinants</b>			
<b>Determinant of Health</b>	<b>Decision</b>	<b>Determinant of Health</b>	<b>Decision</b>
<b>Lifestyles</b>		<b>Economic Conditions Affecting Health</b>	
Physical Activity	Scoped In	Unemployment	Scoped In
Diet	Scoped In	Income	Scoped Out
Alcohol, cigarettes, non-prescribed drugs	Scoped Out	Economic Inactivity	Scoped Out
Sexual Activity	Scoped Out	Type of Employment	Scoped In
Other Risk-taking Activity	Scoped Out	Workplace Conditions	Scoped In
<b>Social and Community Influences on Health</b>		<b>Living/Environmental Conditions Affecting Health</b>	
Social Support and Social Networks	Scoped In	Neighbourhood Design and Housing	Scoped In
Community Identity	Scoped In	Built Environment	Scoped In
Divisions in Community	Scoped In	Attractiveness of the Area	Scoped In
Family Organisation and Roles	Scoped Out	Quality and Safety of Play Areas	Scoped In
Citizen Power and Influence	Scoped Out	Green Space	Scoped In
Sense of Belonging	Scoped Out	Air Quality	Scoped In
Social Isolation	Scoped Out	Water Quality	Scoped In
Peer Pressure	Scoped Out	Noise incl. indoor environment	Scoped In
Racism	Scoped Out	Injury Hazards	Scoped Out
Local Pride	Scoped Out	Odour	Scoped Out
Cultural and Spiritual Ethos	Scoped Out	Community Safety	Scoped In
Other Social Exclusion	Scoped Out	Waste Disposal	Scoped In
Neighbourliness	Scoped Out		
<b>Macro-economic, Environmental and sustainability factors</b>		<b>Access and Quality of Services</b>	
Economic Development	Scoped In	Public Amenities	Scoped In
Government Policies	Scoped Out	Transport including Parking	Scoped In
Gross Domestic Product	Scoped Out	Shops and Commercial Services	Scoped In
Climate	Scoped In	Medical Services	Scoped In
Biological Diversity	Scoped In	Care Services	Scoped Out
		Careers Advice	Scoped Out
		Education and Training	Scoped Out
		Information Technology	Scoped Out



### 3.1.2 Spatial Scope

The following study areas have been considered depending on the relevant assessment topic:

- Primary schools have been assessed within 1.6 km of the site boundary;
- To allow for pupil choice and in recognition that older students are more willing and able to travel further to school, secondary schools (for academic years 7-11) has been assessed at a 3.2 km distance;
- Primary healthcare provision, nurseries and leisure facilities has been assessed within approximately 1.6 km from the site boundary as this represents a reasonable walking distance;
- Existing open space has been assessed within 800 m of the site in line with Greater London Authority (GLA) Guidance (Play and Informal Recreation SPG, 2012);
- Existing playspace has been assessed within the following distances:
  - Under 5 years: 100 m;
  - 5-11 years: 400 m; and
  - 12+ years: 800 m.

### 3.1.3 Temporal Scope

The assessment has considered impacts arising during the demolition and construction stage which would be expected to be temporary and short (0-5 years) to medium-term (5-10 years) in nature and from the completed development stage which would be expected to be permanent and long-term in nature (i.e. more than 10 years).

## 3.2 Consultations

### 3.2.1 EIA Scoping

An environmental impact assessment (EIA) Scoping Report<sup>20</sup> was submitted to the WCC on 17 September 2020 in support of a request for a formal EIA Scoping Opinion. A discrete human health chapter was scoped out of the Environmental Statement as no significant effects were predicted to arise as a result of the proposed development. It was confirmed that several technical chapters would consider health, notably, Air Quality; Noise and Vibration; Wind; and Daylight, Sunlight and Overshadowing.

In subsequent pre-application correspondence with the WCC, a standalone HIA was identified as required to validate the application. WCC was consulted on the methodology of the HIA. The Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Toolkit approach was proposed, drawing from relevant information contained within the ES and other planning application documentation.

Accordingly, the HIA has been undertaken in accordance with guidance provided by the following documents:

- The Healthy Urban Development Unit (HUDU) publication 'Watch out for health – A checklist for assessing the health impact of planning proposals'<sup>21</sup>; and
- The DoH publication 'A Guide to carrying out a Health Impact Assessment of new policy as part of the Impact Assessment Process'.

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<sup>20</sup> Ramboll, 2020. Paddington Green Police Station: Environmental Impact Assessment Scoping Report, September 2020.

<sup>21</sup> London Healthy Urban Development Unit, 2019. Rapid Health Impact Assessment Tool, October 2019 [online]. Available at: <https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2019/10/HUDU-Rapid-HIA-Tool-October-2019.pdf>

WCC issued their Scoping Opinion on 26 March 2021. The Scoping Opinion states that human health can be scoped out of the ES as it is agreed that significant effects are unlikely to arise as a result of the proposed development.

This HIA has been prepared to provide evidence to WCC of how the proposed development has integrated health and wellbeing measures into the design, and to provide recommendations for the Applicant.

### 3.2.2 Public Consultation

#### *Community Consultation*

Comprehensive pre-application consultation with neighbouring residents and stakeholders was undertaken by the Applicant.

Due to the impact of the COVID-19 pandemic and the inability to hold face-to-face consultation events, a digital model of engagement was selected. This has included the following:

#### *Digital Consultation Website*

A digital website was created and has been live since 25 November 2020 featuring information about the proposed development, exhibition boards to view and two surveys designed to gather feedback and comments on the proposals. The consultation for comments in relation to the first round of consultation officially closed on 17 December 2020. The second round of consultation reopened on 23 February and extended to 5 March. Key statistics are as follows:

- Distribution of over 12,000 flyers advising of consultation launch;
- 60,000+ social media impressions;
- 1,000+ unique views of the consultation website with 80 completed surveys;
- 100+ surveys completed; and
- 15+ stakeholder meetings.

#### *Webinars*

As part of the consultation, the project team held four webinars, taking place on 3 December, 10 December 2020, 25 February and 3 March 2021.

The webinars included a presentation from the project team followed by a Q&A session with viewers. All webinars were recorded and added to the website for anyone to view.

In total, 60+ people registered to attend the webinars and once uploaded to the consultation website there were a further 280 views.

#### *Surveys*

Over 100 surveys were also completed as part of the consultation process. A significant proportion of the feedback received was from the first phase of public engagement, there were a smaller number of respondents to the second consultation phase. The main points raised can be categorised as follows:

- Height and Design– A number of people were concerned with the height of the blocks and how this would impact views from the local area. Given the amendments made between the two consultation phases to reduce the height and further refine the design, the level of concern decreased between the two phases;
- Traffic, Parking and Increased Population – With further residents moving to the area, respondents questioned how the increase in pedestrian traffic and parking would be managed;

- Crime – Concerns were raised by residents that as a result of the closure of the police station, there would be an increased level of crime in the area. Questions were asked about how this might be managed as part of the development;
- Affordable Homes – Respondents were positive about the significant provision of affordable housing at this location. Questions were asked about the percentage of affordable housing that would be included on the site and the tenure split;
- Connectivity for Cyclists and Pedestrians – Questions were asked about the increase of pedestrians and cyclists on the site and how we could ensure that the area is safe and usable;
- Green Spaces and Public Realm – Respondents were keen to ensure that there were usable green spaces for all those living in the area. There was a positive response to the public realm improvements proposed as part of the development and how this would improve the wider area; and
- Environmental Concerns - Concern was raised for residents living next to the Westway and how pollution would be managed.

These points are relevant to the HIA as they relate directly to the health and wellbeing of existing residents within the local community and of future residents. A short summary of how the design has been informed by community feedback is provided in Section 5.3.

### **3.3 Structure of the Report**

The report comprises the following key sections:

- Section 4: Site Description;
- Section 5: Proposed Development;
- Section 6: Key Health Statistics and Vulnerable Groups;
- Section 7: Impact Assessment; and
- Section 8: Conclusion.

### **3.4 Assumptions and Limitations**

The assessment of effects has been undertaken against the most recent, publicly available data; the progress of emerging data was tracked throughout to ensure an up-to-date assessment is presented.

The spatial levels have been assessed where data is available and/or where it is considered most informative based on professional judgement.

Where data has not been available at the identified levels, alternative spatial data deemed relevant and appropriate has been used.

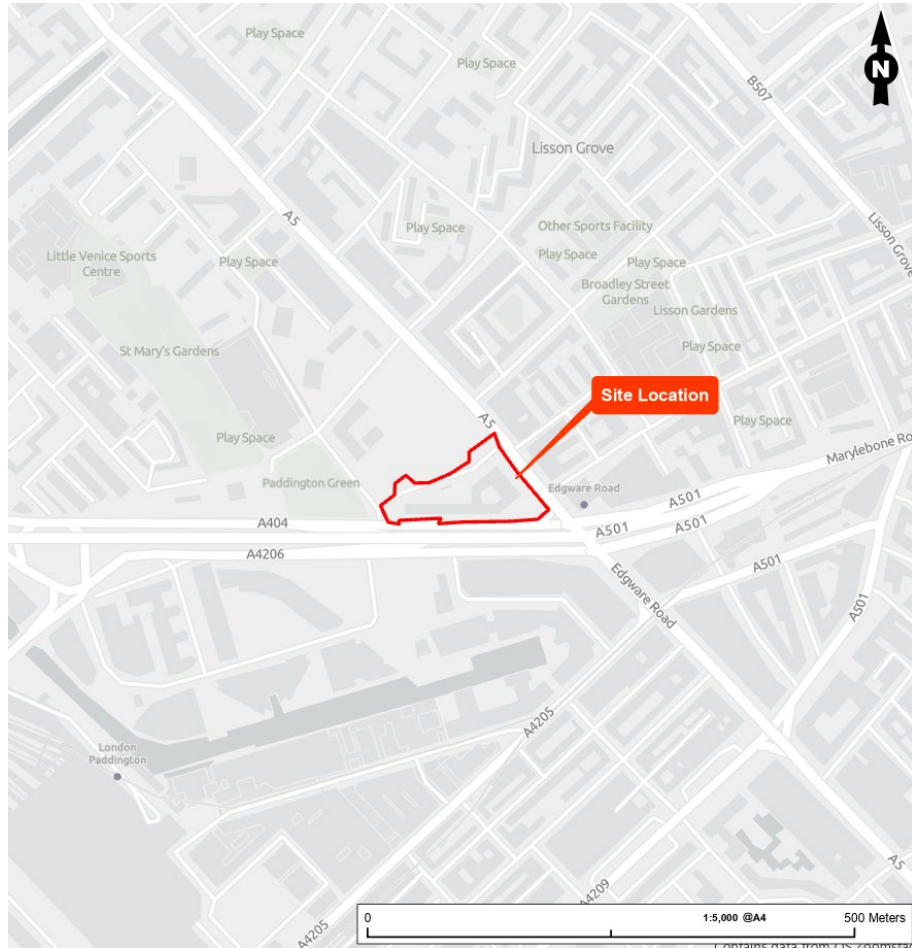
Publicly available information has been relied upon in undertaking the assessment. It has been assumed that the information is up-to-date.

For the cumulative assessment, the most recent, publicly available data available on local authority planning portals was used to inform the HIA.

## 4. SITE DESCRIPTION

### 4.1 Site Description and Context

As shown in Figure 2.1, the site is located at 2-4 Harrow Road, Paddington, London, W2 1XJ (centred at National Grid Reference: TQ 26945 81743).



**Figure 2.1: Site Location**

The site is bound by:

- West End Gate (WEG) development to the north;
- Edgware Road to the east;
- Harrow Road and the A40 to the south;
- Paddington Green Road and open space to the west; and
- 14-17 Paddington Green (14-17 PG) development to the north-west.

The site covers an area of 0.83 hectares (ha).

The 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. A substation is located on the north-eastern corner of the site and there are six existing trees on the eastern and southern boundaries.

The remaining areas of the site are formed of concrete, asphalt, cobble and paving hardstanding. The site is primarily vacant, with the exception of the basement which is being used for storage of materials for the WEG development to the north and the use of the annex as an office. The surrounding context is characterised by urban development with a mixture of residential, commercial, educational, and open space land use as shown in Figure 2.2.



**Figure 2.2: Surrounding Context**

The WEG development (16/12162/FULL) to the north of the site is under the control of the Applicant and at an advanced stage of construction, with Blocks A to F nearing completion and Block C occupied. WEG Blocks A-F are anticipated to be fully completed and occupied by Q3 2022.

The site is surrounded by a number of tall buildings located in the Hall Place Estate (Hall Tower and Braithwaite Tower, Parsons House) and WEG to the north; and the Hilton London Metropole Hotel, Burne House, Capital House and Merchant Square development to the south. There are further tall buildings with planning permission in the Paddington basin which are partially or yet to be implemented.

The site is situated in a highly accessible location with a public transport accessibility level (PTAL) rating of 6b. Edgware Road Underground Station is approximately 50 m to the east of the site and Paddington Station approximately 400 m to the south-west of the site. There are also good bus, pedestrian and cycle routes in the vicinity of the site, as shown in Figure 2.3.

The site is located within Little Venice Ward. WCC is one of the 20 % most deprived authorities in England and about 27.3 % (6,680) children live in low income families<sup>22</sup>.

<sup>22</sup> Public Health England, 2019. Local Authority Health Profile 2019. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E09000033.html?area-name=Westminster>.



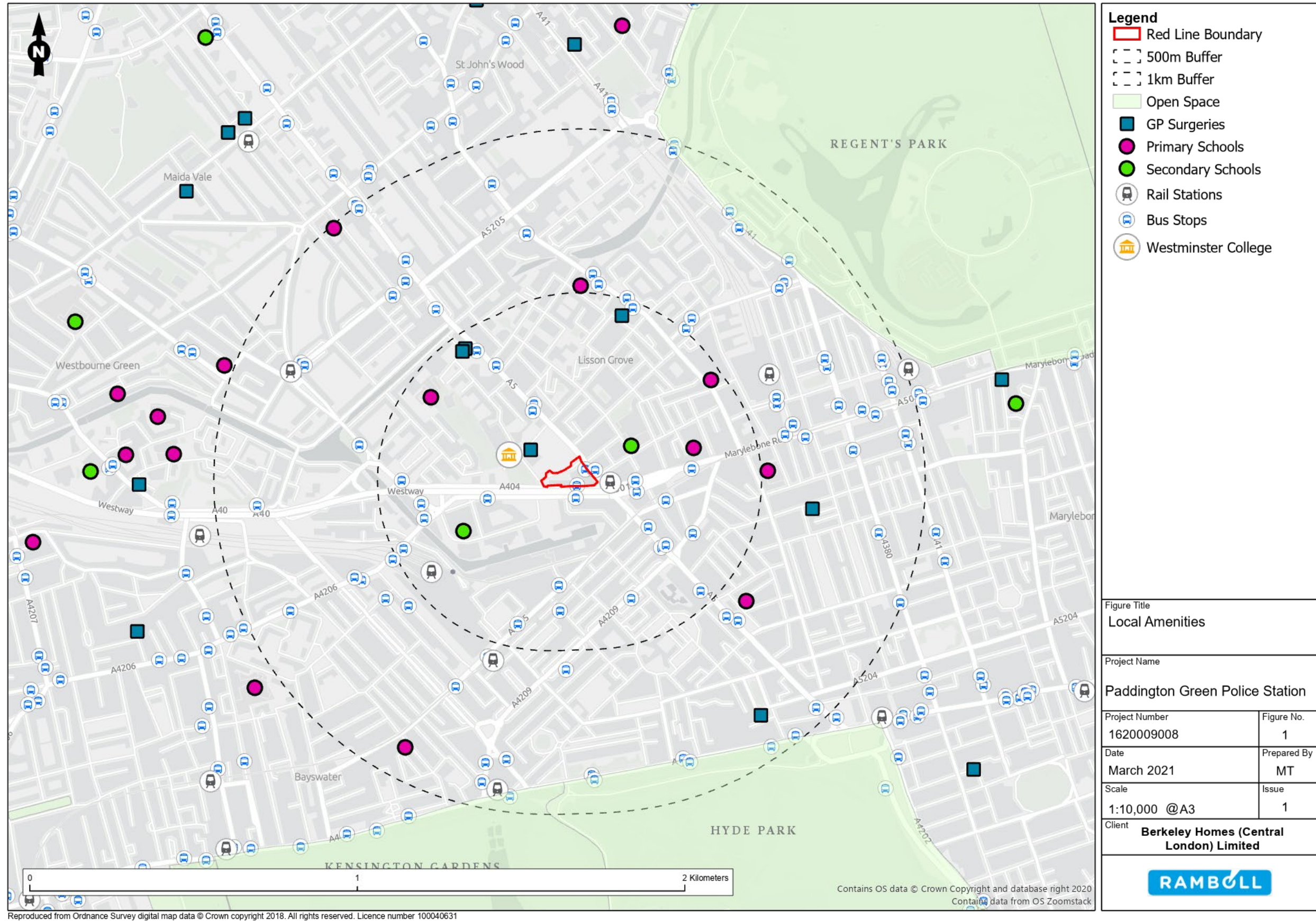


Figure 2.3: Existing Local Amenities



## 5. PROPOSED DEVELOPMENT

### 5.1 Proposed Development Description

The Applicant is submitting a full planning application for the following:

*'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 seeks to deliver the following:

- Demolition of the existing Paddington Green Police Station;
- Excavation of two basement levels which would provide a connection into the WEG development basement;
- Erection of three blocks along Harrow Road and Edgware Road;
- Delivery of 556 residential units;
- Delivery of ground floor flexible commercial uses, office uses and affordable workspace, with residential uses primarily at upper floors and associated landscaped residential gardens;
- Provision of plant rooms, servicing access, disabled car and cycle parking spaces within the basement;
- Provision of private and public amenity space, with associated landscape and planting; and
- Improvements to public realm throughout the site including new pedestrian and cycle links, provision of public art and play space.
- A commitment to implement a construction environmental management plan (CEMP) during the demolition and construction stage. A framework for the CEMP is presented in ES Chapter 5: Demolition and Construction Description.

A computer generated image of the proposed development is provided in Figure 5.1.



**Figure 5.1: Proposed Development**

Table 5.1 summarises the floorspace area schedule by Use Class which would be brought forward.

<b>Table 5.1: Proposed Development Area Schedule</b>	
<b>Uses</b>	<b>Gross Internal Area (GIA) m<sup>2</sup></b>
Residential (Use Class C3) - 556 units including ancillary Residential Amenity*	52,657
Office (Use Class E)	4,762
Flexible Commercial Floorspace (use Class E)	1,088
Affordable Workspace (Use Class E/F.1)	328
<b>Total</b>	<b>58,835</b>
* including ancillary Residential Amenity (Residential Lounge – 232m <sup>2</sup> / penthouse access 91m <sup>2</sup> - Golf Lounge - 112m <sup>2</sup> GIA)	

The land use distribution across the site has been arranged on horizontal and vertical profiles to create distinct residential, office, flexible commercial and affordable workspace zones.

The flexible commercial floorspace would be provided at the ground floor level of Blocks J and K creating active frontages.

Affordable workspace would be provided in Block I and office space would be provided across ground level, level one and level two of Blocks J and K.

The majority of residential units would be located on the upper floors; however, two ground floor units would be provided at Block I. The residential provision across the proposed development would include a variety of unit types, ranging from one-bedroom, one person units to four-bedroom, six person units. There would be a delivery of 38 % affordable units, exceeding the requirements as specified by the GLA. The proposed unit and tenure mix are presented in Table 5.2.

<b>Table 5.2: Residential Unit and Tenure Mix</b>						
	<b>Unit Type</b>					
	<b>Studio</b>	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4 Bed</b>	<b>Total</b>
Intermediate	0	82	44	0	0	126
Social Rented	0	8	41	34	1	84
Private	32	107	102	98	7	346
<b>Total by unit</b>	<b>32</b>	<b>197</b>	<b>187</b>	<b>132</b>	<b>8</b>	<b>556</b>
<b>% by unit</b>	5.8	35.4	33.6	23.8	1.4	100

The Westminster Housing Markets Analysis<sup>23</sup> indicates that the predominant requirement for market housing in the local authority area is for one-bed properties, with little need for larger properties. The document also states that, in 2014, there were almost 4,500 households on the waiting list for social housing within the local authority area. As 40.9 % of the proposed development would deliver studio and one-bedroom apartments, it can be concluded that the proposed unit and tenure mix would be satisfying the requirements as specified in the analysis document.

## 5.2 Landscaping Strategy

The new landscape spaces have been designed to complete the wider WEG masterplan. The site's location at the junction of Edgware Road, Harrow Road and the A40, existing context, connectivity

<sup>23</sup> Westminster City Council, 2014. Westminster Housing Markets Analysis. London. WCC.



with the wider public realm, function and form of the proposed development has collectively informed and influenced the landscape and public realm proposals. The proposed landscaping strategy is presented in Figure 5.2 which shows the defined Character Areas.



**Figure 5.2: Proposed Landscaping Strategy**

- **Newcastle Place:**
  - Newcastle Place would provide a new vibrant public amenity space at the heart of the proposed development, and a green, pedestrian/cycle friendly link between Edgware Road and Paddington Green;
  - A formal bosque of trees with feature paving, seating and lighting immediately to the south of WEG Block B, would provide a structured space in the streetscape and entry into Newcastle Place from Edgware Road. An animated water feature and the existing London Plane tree on Edgware Road would combine with the bosque to create a strong legible gateway to the site and invite further exploration. The bosque would provide space for circulation and gathering, as well as outdoor dining opportunities to spill-out from the adjacent retail use in WEG Block B;
  - The re-aligned carriageway of Newcastle Place would enable the creation of a central landscaped, amenity lawn area with a southern aspect. The lawn would offer an area for informal recreation and relaxation that would be complimented by high quality surface finishes, seating and integrated elements for play. Raised planters wrapping the lawn would provide for shelter and enclosure, complemented by semi-mature and multi-stems tree planting, groundcover and accent plants.
- **Edgware Road Streetscape:**
  - Along Edgware Road the deep building setback would allow for generous pedestrian circulation spaces and space for spill out uses including, outdoor seating and displays, activating the building frontage;

- A new avenue of London Plane trees would improve the streetscape environment and promote the tree-lined avenue character of Edgware Road. The new planting would adapt and integrate with final TfL works to convert the existing Joe Strummer subway into a rain garden;
- Additional improvements would comprise enhanced paving, integration of signage, information and additional cycle parking;
- Edgware Road Junction Plaza:
  - The avenue of Plane trees along the Edgware Road frontage of the site, would culminate in a new plaza space on the corner of Edgware Road, opposite Edgware Road Underground Station;
  - Within the predominantly hard paved plaza, flowering pear trees would provide greening, shade, shelter and seasonal interest. Fixed feature seating would provide places to stop and rest with additional space to allow flexibility for spill out outdoor activity from the proposed retail uses;
- Harrow Road Streetscape:
  - Active flexible commercial uses would be provided along Harrow Road at ground level with affordable workspace positioned on the corner adjacent to Paddington Green;
  - A new roadside tree avenue would provide greening and a physical and visual buffer to the adjacent carriageway and fly-over, improving the quality of the pedestrian environment and health of the street; and
  - Other enhancements would include decluttering of redundant signage, guarding and access restrictions, footway paving improvements and new cycle parking.

A combination of greening and landscaped spaces has been designed for relaxation and enjoyment would bring much needed diversity to Newcastle Place and the surrounding streets and create a new, desirable clean-air route through the site connecting Edgware Road with Paddington Green.

### **5.3 Proposed Development Evolution**

The proposed development has evolved in response to the community consultation as described in Section 3.2.2. These are summarised as follows:

- Reduction of building heights to a maximum of 32 storeys, reducing homes to 556 in total;
- Increased number of larger family sized homes for socially rented families;
- Improved pedestrian and cycle connectivity and entrances;
- An enlarged community space which is to be provided as an affordable workspace;
- Coalescence to WEG through facades and architecture;
- Focus on sustainable development; and
- Inclusion of landscaping beyond legal boundary including consideration of secure by design principles in the design.

## 6. KEY HEALTH STATISTICS

This section provides a high-level summary of the key health statistics for the site and surrounding study area.

### 6.1 Key Statistics

The Westminster Local Authority Health Profile<sup>24</sup> indicates that health in Westminster is varied compared with the national average. It is estimated that 27.3 % (6,680) of children in Westminster live in low-income families, higher than the national average of 17 %; whilst life expectancy for both men and women is 83.9 and 86.5 respectively, higher than the national average of 79.6 and 83.2 respectively.

Life expectancy is 13.5 years lower for men and 7.4 years lower for women in the most deprived areas of Westminster than in the least deprived areas.

The site is located in Little Venice ward:

- According to the 2011 Census<sup>25</sup>, the population at the neighbourhood level (i.e. Little Venice Ward) is 10,633, which translates to a population density of 167.3 persons per hectare (ha). This is higher than the local authority population density (102.2 persons per ha) and substantially higher than the regional population density (52.0 persons per ha) and national levels (4.1 persons per ha). The ward has a high proportion of flats, maisonettes and apartments, which comprise 90 % of the housing stock. In comparison, flats, maisonettes and apartments make up 52 % of the regional housing stock overall, with a further 48 % comprising whole houses or bungalows. This correlates to the high population density described;
- The population of Westminster is expected to grow in the next 20 years. There are various published population projections, however the ONS predicts a population growth of 11 %<sup>26</sup> between 2021 and 2041;
- The English Indices of Deprivation 2019<sup>27</sup> data shows that the Little Venice Ward is within the 37 % least deprived LSOAs nationally on average, with an average IMD rank of 20,868 (out of a total of 32,844). The Little Venice ward ranks within the most deprived 20 % on a national level for the 'living environment' indicator (5,445 of 32,844) and ranks within the least deprived 20 % on a national level for the 'health deprivation & disability' indicator (27,189 of 32,844);

According to the Westminster Local Authority Health Profile, key health issues in the borough are as follows:

- The rates of new sexually transmitted infections, 'killed and seriously injured on roads' and new cases of tuberculosis are worse than the national average;
- Estimated diabetes diagnosis rate is higher than the national average; and
- Children in Year 6 prevalence of obesity (including severe obesity (24.2 % compared to the average of 20.2 %); and
- Levels of teenage pregnancy, GCSE attainment (average attainment 8 score) and smoking in pregnancy are better than the England average.

<sup>24</sup> Public Health England, 2019. Local Authority Health Profile 2019. Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E09000033.html?area-name=Westminster>.

<sup>25</sup> Office for National Statistics, 2011. Census 2011. ONS.

<sup>26</sup> Office for National Statistics, 2020. Subnational Population Projection (2018 based) [online]. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2018based>.

<sup>27</sup> Ministry of Housing, Communities and Local Government, 2019. Indices of Multiple Deprivation. London. MHCLG.

- Wider determinants of health issues of relevance to the site are as follows:
  - Percentage of children in low income families at 27.3 % (national average of 17.0 %); and
  - Percentage of people in employment is only 68.9 % which is considerably lower than the national value of 75.6 %.
- Health protection issues are as follows:
  - Tuberculosis incidence rate of 14.8 people out of 100,000, compared to the England average of 9.2 per 100,000 people; and
  - New sexually transmitted infection (STI) diagnoses rate (excluding chlamydia aged <25) at 2,694 per 100,000 people, compared to the England average of 850.6 people per 100,000 people.

## **6.2 Identified Vulnerable Groups**

Due to the local context provided within the key health statistics, the identified vulnerable groups are as follows:

- Future users of the proposed development who are overweight or obese (especially children);
- Those with vulnerable respiratory systems due to the increased relevance of new cases of tuberculosis; and
- Road users within the surrounding network.

## 7. HEALTHY URBAN DEVELOPMENT UNIT ASSESSMENT

The HUDU Rapid HIA checklist/assessment matrix identifies 12 topics or broad determinants. Under each topic, the tool identifies examples of planning issues which are likely to influence health and wellbeing.

Health impacts may be short-term or temporary, related to demolition and construction or longer-term, related to the operation and maintenance of a development and may particularly affect vulnerable or priority groups of the population. Where an impact is identified, actions should be recommended to mitigate a negative impact or enhance or secure a positive impact.

The HUDU checklist enables the proposals to be assessed against the following broad range of disciplines:

- Housing quality and design;
- Access to healthcare services and other social infrastructure;
- Access to open space and nature;
- Air quality, noise and neighbourhood amenity;
- Accessibility and active travel;
- Crime reduction and community safety;
- Access to healthy food;
- Access to work and training;
- Social cohesion and lifetime neighbourhoods;
- Minimising the use of resources; and
- Climate Change.

The HUDU checklist has been completed for the proposed development and is presented in Section 6 of this report.

Where criteria are not considered relevant, the concluding potential health effect is stated as Neutral.

In addition, and subject to available information, commentary is made on cumulative development within the study area of the site to provide the wider context of urban regeneration initiatives that could impact on community health and wellbeing.

Table 7.1 draws information from various planning application documents, such as the ES, the DAS, and the Energy Statement. While relevant sections from these reports have been summarised within Table 7.1, further detailed information is provided within these accompanying reports and should be referred to where necessary.

## 8. HUDU RAPID HIA TOOL: PLANNING CHECKLIST

Table 8.1 presents the rapid HIA results for the proposed development.

Table 8.1: HUDU Planning Checklist				
Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Actions
<p><b>1. Housing Quality and Design</b></p> <p>Issues for consideration within this topic comprise:</p> <ul style="list-style-type: none"> <li>• Accessible and adaptive residential units;</li> <li>• Internal space standards, orientation and layout;</li> <li>• Affordable housing provision and tenure mix; and</li> <li>• Energy efficiency of the proposed development.</li> </ul> <p>Access to decent and affordable housing is vitally important to physical and mental health and wellbeing, with particular consideration to the very young and very old populations. Accessible units for vulnerable populations is an important requirement for new schemes.</p>				
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings'?	Yes No N/A	The residential units have been designed to meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings', with the remainder (a minimum of 10 %) being designed to meet Building Regulation requirement M4(3) 'Wheelchair User Dwellings'.	Positive Negative Neutral Uncertain	None required.
Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?	Yes No N/A	<p>The proposed development would bring forward 556 residential units, with a minimum of 10 % of homes meeting Building Regulation requirement M4(3) 'Wheelchair User Dwellings', with the remaining homes meeting Building Regulation M4(2) 'Accessible and Adaptable Dwellings'.</p> <p>The proposed development would incorporate the principles of Inclusive Design, so that everyone can access homes, streets, spaces and communal uses easily. This includes those with disabilities, including wheelchair users, blind and partially sighted people, but also the elderly, people with pushchairs and those walking with small children.</p> <p>The following space standards would be provided in each M4(3) residential unit:</p> <ul style="list-style-type: none"> <li>• Adequate space for the storage and charging of two wheelchairs would be provided in the closest possible proximity to the private entrances;</li> <li>• Main bedrooms exceed the required minimum areas; and</li> <li>• The residential units would provide wheelchair turning and manoeuvring spaces as well as clear access zones within all habitable rooms.</li> </ul>	Positive Negative Neutral Uncertain	None required.
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	Yes No N/A	The proposed development would bring forward 556 residential units, with a minimum of 10 % of homes meeting Building Regulation requirement M4(3) 'Wheelchair User Dwellings', with the remaining homes meeting Building Regulation M4(2) 'Accessible and Adaptable Dwellings'.	Positive Negative Neutral Uncertain	None required.

<b>Table 8.1: HUDU Planning Checklist</b>				
<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Does the proposal promote good design through layout and orientation, meeting internal space standards?	Yes No N/A	<p>The proposed development would promote good design by meeting internal space standard requirements, with 48 % dual aspect homes (defined as homes with opening windows on at least two sides) and the adoption of a well-considered approach to building layout and circulation, in accordance with the Technical Housing Standards – Nationally Described Space Standard<sup>28</sup>. The majority of single aspect units would face south, east or west.</p> <p>While the WEG development elevations are in close proximity to the north, there is significant separation to the buildings to the south, to the east and to the west. Living rooms in Blocks I and J (which have a narrower gap between the Blocks) have been positioned on the corner to provide dual aspect and to minimise the impact of overlooking. The delivery of recessed balconies would also provide a greater distance between habitable rooms of the Blocks.</p> <p>The single aspect living spaces that would face into the gap between the buildings have been designed to sit opposite bedroom spaces with recessed balconies used to increase the effective gap between the buildings. Potential privacy issues to residential units at ground floor level have been addressed by the introduction of a landscape privacy strips that would allow for a zone of planting to define the public/private boundary and act as a visual buffer to bring privacy to the limited number of ground floor units.</p>	Positive Negative Neutral Uncertain	None required.
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	Yes No N/A	<p>The proposed development would contribute to meeting the housing target by providing 556 residential units and would help to encourage a more mixed and balanced community within the area through the development of market and affordable housing, as is encouraged by the NPPF and regional and local policy.</p> <p>The proposed development would provide a range of housing types and sizes: studio, 1-bed, 2-bed, 3-bed and 4-bed units. . A policy compliant proportion of family sized homes is provided across the development, with 25 % of homes providing 3 or more bedrooms.</p> <p>The Westminster Housing Markets Analysis indicates that the predominant requirement for market housing in the local authority area is for one-bed properties, with little need for larger properties. The document also states that, in 2014, there were almost 4,500 households on the waiting list for social housing within the local authority area. As 40.9 % of the proposed development would deliver studio and one-bedroom apartments, it can be concluded that the proposed unit and tenure mix would be satisfying the requirements as specified in the analysis document.</p> <p>The proposed delivery of 38% affordable housing by habitable room exceeds the requirements of the Policies H5 and H6 of the London Plan and the Mayor's SPG on Affordable Housing and Viability. In addition, the affordable housing tenure split proposed is in line with the London Plan, Westminster City Plan, and identified local need.</p>	Positive Negative Neutral Uncertain	None required.
Does the proposal contain homes that are highly energy efficient (e.g. a high SAP rating)?	Yes No N/A	<p>According to the Spatial Planning for Health Guidance<sup>29</sup>, the provision of energy efficient homes can improve general health, mental health, asthma outcomes and reduce rates of mortality.</p> <p>With regard to energy and carbon compliance, the proposed development would meet the Building Regulations Part L 'Target Emission Rate' (TER) requirements for the Part L revision which is current at the time of initial construction works for each particular developmental phase.</p> <p>The energy strategies have been developed taking into consideration the Energy Hierarchy approach ('Be Lean', 'Be Clean', and 'Be Green') which aims to reduce the energy consumption of the proposed development by prioritising the implementation of passive design and energy efficiency measures ('Be Lean'), followed by the consideration of district heat networks ('Be Clean') and the implementation of low and zero carbon technologies ('Be Green').</p> <p>Passive and energy efficiency measures ('Be Lean') would be employed within the proposed development to minimise carbon emissions. These measures would include effective building layout, improved thermal envelope performance and efficient service design. Examples of particular measures that are proposed to be implemented are as follows:</p> <ul style="list-style-type: none"> <li>• Glazed area of façade to incorporate high efficiency glazing throughout, reducing heat gain (and associated cooling requirements) and heat loss at the building perimeter, thus reducing the heating and cooling energy consumption;</li> <li>• High efficiency mechanical ventilation with heat recovery; and</li> <li>• High efficiency lighting.</li> </ul>	Positive Negative Neutral Uncertain	None required.

<sup>28</sup> Department for Communities and Local Government, 2015. Technical housing standards – nationally described space standard [online]. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf)

<sup>29</sup> Public Health England, 2017. Spatial Planning for Health. An evidence resource for planning and designing healthier places. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729727/spatial\\_planning\\_for\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf)

Table 8.1: HUDU Planning Checklist				
Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Actions
<p><b>2. Access to Healthcare Services and Other Social Infrastructure</b></p> <p>The issues to consider within this topic comprise:</p> <ul style="list-style-type: none"> <li>• capacity of the existing health and social infrastructure;</li> <li>• increased demand for services produced by the new introduced residential population; and</li> <li>• accessibility and use of buildings by disabled and older people.</li> </ul> <p>Access to social and health infrastructure is a key component of a Lifetime Neighbourhood. New schemes need to provide the opportunity for new site users to access good quality, accessible local services to create a strong, sustainable and cohesive community.</p>				
Does the proposal retain or re-provide existing social infrastructure?	Yes No N/A	<p>Historically, the existing site did provide community infrastructure in the form of the police station. However, the police station was vacated in 2018. Throughout consultation with the Greater London Authority (GLA), the loss of the police/community use was accepted given the Mayor's Office for Policing and Crime's (MOPAC) Estate Strategy<sup>30</sup> and long held intention to dispose of the site.</p> <p>The site was acquired by the Applicant in 2020 following the vacation of the site by the Metropolitan Police as part of their London wide estate and disposals strategy. In this regard the neighbourhood policing function has been relocated to a new facility on Church Street.</p> <p>The intent is to retain the existing public art on the Harrow Road facade of the building and work with WCC to relocate this within the borough.</p>	Positive Negative <b>Neutral</b> Uncertain	None required.
Does the proposal assess the impact on healthcare services?	<b>Yes</b> No N/A	<p>The assessment of the effect of the proposed development on health infrastructure is presented within ES Chapter 6: Socio-Economics.</p> <p>The proposed development is anticipated to deliver an additional population of 1,185 within the area (comprising adults and children) who would require access to health care.</p> <p>Based on the HUDU recommended standard of 1,800 patients per GP, the proposed development with a maximum population of 1,185 people would therefore generate need for an additional 0.66 GPs. There is currently a significant deficit in capacity of 22,249 places within the 17 GP surgeries within 1.6 km of the site. The proposed development would therefore increase the demand on the already over-capacity system, resulting in a moderate adverse effect which is considered significant. Therefore, there is not currently capacity to accommodate the population generated by the proposed development.</p> <p>Mitigation would be provided in the form of financial contributions which are likely to be secured through CIL. The CIL contributions collected from the proposed development can be used at the discretion of WCC to fund provision, improvement or operation of new or existing community facilities and other types of social infrastructure..</p>	Positive <b>Negative</b> Neutral Uncertain	Financial contributions towards healthcare facilities to be agreed with WCC. Once paid, the effect on healthcare services would be Neutral.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	Yes No N/A	<p>The existing site does not provide an existing healthcare facility.</p> <p>The proposed development would not deliver a healthcare facility. This was considered during the pre-application consultation. The site is not considered an appropriate location for a healthcare facility given the locational context.</p>	Positive Negative <b>Neutral</b> Uncertain	None required.

<sup>30</sup> Mayor's Office for Policing and Crime. MOPAC Estate Strategy 2013/2016. London.



<b>Table 8.1: HUDU Planning Checklist</b>				
<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. schools, social care and community facilities?	Yes No N/A	<p>The assessment of the effect of the proposed development on social infrastructure such as education and healthcare facilities is presented within ES Chapter 6: Socio-Economics.</p> <p>According to the GLA population yield calculator, the maximum population yield from the proposed development would be 1,815 people. Due to this yield, there would be additional demand for community facilities. To quantify what the demand might be from the newly introduced residential population of the proposed development, reference to a floorspace per 1,000 persons of 30 m<sup>2</sup> for library space and 50 m<sup>2</sup> for community space has been adopted based on professional judgement as these measurements are commonly used when assessing community infrastructure needs.</p> <p>Due to the site's central London location, there are a wide range of community facilities within proximity to the proposed development, including libraries (Church Street Library, Doorstep Library), mental health and wellbeing services (Central London Samaritans), elderly support facilities (Contact the Elderly, Age UK, Advantages of Age Ltd), sports academies and coaching (DS Football Academy, Greenhouse Sports, London Sport), art and dancing classes (Abundance Arts, ActingWorks, Dream Arts), medical support groups (Breathe Easy Westminster) amongst many others.</p> <p>The proposed development is not expected to require additional library facilities, as there are adequate facilities within walking distance of the proposed development, including the Paddington Library, Paddington Children's Library and Church Street Library.</p> <p>The proposed development would provide non-residential floorspace for office, flexible commercial and affordable workspace. Affordable workspace was introduced into the proposed development design in line with comments and feedback received during the consultation process to provide a space that would be beneficial to the local community.</p>	Positive Negative Neutral Uncertain	None required.
Does the proposal explore opportunities for shared community use and co-location of services?	Yes No N/A	<p>The proposed development is intrinsically linked to the neighbouring WEG development with landscaping and also with shared basement space to allow for co-location of services. The proposed development would be underlain by two levels of basement both of which would connect into the basement of the WEG development to the north. Basement B1 would be the larger of the two, comprising a full basement level (as existing) and extending to the entire footprint of the site with an additional extension in the north-west to provide the connection to the WEG development. The on-site basement would be accessed off Church Street as per the existing arrangement associated to WEG.</p> <p>Level B1 would contain the following uses:</p> <ul style="list-style-type: none"> <li>• 18 Accessible car parking spaces;</li> <li>• 960 Long-term cycle storage spaces;</li> <li>• Cycle changing facilities for use by the non-residential uses;</li> <li>• Refuse stores; and</li> <li>• Mechanical and electrical plant for all three blocks.</li> </ul> <p>The significantly smaller Level B2 basement would accommodate waste management facilities which would integrate with the existing WEG waste management strategy.</p> <p>There are several existing car club operators (ZipCar) in close proximity to the site. There are three ZipCar spaces located within 200 m of the site<sup>31</sup>. There is a Santander docking station at Edgware Road Station which has 63 cycle docking stations<sup>32</sup>.</p> <p>It is noted that a community space was proposed early on during pre-application consultations; however, feedback indicated that there was no need for such a use and that the delivery of affordable workspace would be more appropriate.</p>	Positive Negative Neutral Uncertain	None required.

<sup>31</sup> ZipCar. Find Zipcars Near You. Available at: <https://www.zipcar.com/en-gb/blog/how-it-works/finding-your-zipcar>.

<sup>32</sup> Transport for London. Find a Docking Station. Available at: <https://tfl.gov.uk/modes/cycling/santander-cycles/find-a-docking-station>.

**Table 8.1: HUDU Planning Checklist**

Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Actions
Does the proposal contribute to meeting primary, secondary and post 19 education needs?	Yes No N/A	<p>Analysis of the primary schools that include the site within their catchments indicates that there is currently a surplus in places. In addition, the school forecast data shows that there will be a substantial surplus in local primary schools by 2025 (when the first residential units would likely become occupied). While the proposed development would result in an increased demand of 63 primary school places, there is currently a surplus in school places.</p> <p>The proposed development would result in an increased demand of 28 secondary school places. Similar to primary school capacity, there is a current surplus in school places for secondary uses. However, this surplus is likely to diminish by 2025, when the proposed development would become occupied. Therefore, there would be a need for additional secondary school places in the area.</p> <p>Mitigation would be provided via financial contributions which are likely to be secured through CIL. The CIL contributions collected from the proposed development can be used at the discretion of WCC to fund provision, improvement or operation of new or existing community facilities and other types of social infrastructure..</p>	Positive <b>Negative</b> Neutral Uncertain	<p>Financial contributions to be agreed with WCC and secured by legal agreement.</p> <p>Once paid, the impact on primary school spaces would be Neutral.</p>
<p><b>3. Access to Open Space and Nature</b></p> <p>Issues to consider within this topic include:</p> <ul style="list-style-type: none"> <li>• Access to open and natural spaces;</li> <li>• Opportunities for physical activity;</li> <li>• Other outdoor uses;</li> <li>• Maintenance of the open spaces; and</li> <li>• Playspace provision.</li> </ul> <p>Providing secure, convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is growing evidence that access to parks and open spaces and nature can help to maintain or improve mental health. Given the new COVID-19 context, working lives have altered and people now spend more time within their homes/local areas. It is important that developments provide adequate open space and nature to enable outdoor activity and prevent isolation.</p> <p>The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children are missing out on regular exercise, and an increasing number of children are being diagnosed as obese. Access to play spaces, community or sport facilities can encourage physical activity. This is particularly relevant given the health statistic that there is prevalence of under 16 obesity within the local area. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation.</p>				

<b>Table 8.1: HUDU Planning Checklist</b>				
<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Does the proposal retain and enhance existing open and natural spaces?	Yes No N/A	<p>The site is occupied by the Paddington Green Police Station which comprises a 17-storey concrete tower block, a 1-3 storey concrete linking block and an 8-storey concrete tower Block.</p> <p>Currently, the site does not provide any open spaces to the local community or natural spaces of biodiversity value.</p> <p>The proposed development would deliver comprehensive redevelopment of this urban site to provide a variety of landscaped areas, new open spaces and increased connectivity to neighbouring open spaces, including Paddington Green itself. The landscaping has been designed with health considerations in mind. The main objective of the landscaping strategy is to complete the wider WEG masterplan, which together with the proposed development would provide a combination of greening and landscaped spaces for relaxation and enjoyment.</p> <p>The proposed landscaping strategy is summarised in Section 5.2.</p> <p>A Biodiversity Net Gain Assessment<sup>33</sup> has been undertaken of the proposed development which has quantified the level of biodiversity change from the existing site to the proposed development. The increase in biodiversity has been calculated at 6,157 %. These biodiversity gains would be significantly more than the 10 % net gain required by planning policy for area-based habitats and singular/street trees.</p> <p>The biodiverse roof garden at Block K with open-mosaic type habitat, would have a species mix comprising at least 20 species and include plants of known benefit for pollinators, including a number listed on the Royal Horticultural Society's (RHS) 'Plants for Pollinators' list. Additional biodiversity features would be incorporated onto the roof such as log piles, stone piles and sand to attract invertebrates and provide nesting habitat for them. Invertebrate boxes or 'bee hotels' are proposed and would provide additional interest and enhancement for invertebrates such as bees.</p> <p>The provision of landscape planting within the redevelopment would provide new habitat for use by foraging and nesting birds, enhancing the site for birds. Furthermore, a variety of bird nest box types would be provided at suitable locations on the site, attached to or built within buildings and other infrastructure, as mitigation for loss of habitat and additional enhancement. Boxes suitable for house sparrow, starling and swifts would be included.</p> <p>While ground level landscaping features would be accessible to the public, there would be specific features available to residential users of the proposed development. Namely, these would be the communal podium gardens on Blocks J and K. The gardens would be landscaped to create attractive, outdoor spaces, providing residents with opportunities for relaxation, interaction and play. These spaces would include lawns, trees and shrub planting selected to provide year round seasonal interest and value for wildlife. The podium gardens would integrate measures for play provision and communal seating areas, offering opportunity for socialising and informal relaxation and recreation close to home.</p> <p>Access to the communal podium gardens would be via the respective Blocks. In addition to the communal residential gardens, a biodiverse roof space would be created between Blocks J and K. With access restricted to maintenance only the whole of the available roof space would incorporate a range of brown and green habitats to support and promote wildlife within the urban environment.</p>	Positive Negative Neutral Uncertain	None required.
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	Yes No N/A	<p>The existing site is dominated by buildings and hardstanding. While the site is not considered in an area of deficiency for open spaces, with Regents Park and Hyde Park at a relatively close distance, the proposed development would deliver significant redevelopment of the site with a landscaping strategy which focusses on interconnectivity with the neighbouring WEG development and biodiversity increase, as well as delivering high-quality public realm. Further details are provided above.</p>	Positive Negative Neutral Uncertain	None required.

<sup>33</sup> Ramboll, 2021. Paddington Green Police Station Biodiversity Net Gain Assessment.

<b>Table 8.1: HUDU Planning Checklist</b>				
<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Does the proposal provide a range of play spaces for children and young people?	Yes No N/A	<p>There is currently no open space on-site, but the neighbourhood level is not in an area identified as at a deficit for accessible open space. This is due to the close proximity of Paddington Green for open space and five children's playgrounds within 400 m of the site, the nearest of which is located within St Mary's Churchyard.</p> <p>The proposed development's forecast population of 1,185 would result in a demand for 1.9 hectares of open space based on the WCC ratio of 1.6 ha of open space per 1,000 of the population.</p> <p>The proposed development would bring forward a total of 0.3553 ha (3,553 m<sup>2</sup>) of publicly accessible open space to serve the proposed population. This would not achieve the policy requirements for open space but due to the constrained nature of the site, it is considered to be bringing forward a beneficial amount as the current site is not providing any open space. The effect would be both beneficial and adverse. Accordingly, it is considered that the proposed development would result in a Negligible Neutral effect on open space facilities.</p> <p>In total, approximately 192 children aged 0 - 17 years would be introduced to the site with a corresponding demand for approximately 1,918 m<sup>2</sup> of playable space.</p> <p>The proposed development would bring forward a total of 1,138 m<sup>2</sup> of playspace across the age ranges as follows:</p> <ul style="list-style-type: none"> <li>• Ages 0-4 – 833 m<sup>2</sup>;</li> <li>• Ages 5-11 – 305 m<sup>2</sup>; and</li> <li>• Ages 12-17 – 0 m<sup>2</sup>.</li> </ul> <p>Therefore, the proposed development would fall short of the GLA playspace requirements across all the age ranges, although would only fall slightly short of the under 5 year olds playspace requirement.</p> <p>As the delivery of play space on-site would be both beneficial and adverse, it is considered that the proposed development would result in a Negligible Neutral effect on playspace facilities.</p>	Positive Negative <b>Neutral</b> Uncertain	A financial contribution will mitigate the shortfall in on site playspace provision, to be secured by S106 agreement.
Does the proposal provide links between open and natural spaces and the public realm?	Yes No N/A	<p>The site does not currently provide inviting and safe links between open and natural spaces and the public realm.</p> <p>The proposed development would deliver a comprehensively redesigned and landscaped public realm serving the site and local community and providing access to residential and employment.</p> <p>The public realm proposals illustrate how the development would facilitate improvements to the wider health of the surrounding streets by;</p> <ul style="list-style-type: none"> <li>• Providing for pedestrians from all walks of life through creating new green public space within Newcastle Place to encourage recreation, relaxation and socialising.</li> <li>• Promoting walking and cycling through the creation of a pedestrian/ cycle friendly route between Edgware Road and Paddington Green.</li> <li>• Promoting walking through activation of and improving the fabric of the adjacent streets.</li> <li>• Promoting cycling through the provision of abundant shortstay visitor parking.</li> <li>• Promoting public transport use through enhancing access to Edgware Road Underground station and the existing bus stops along Harrow and Edgware Roads.</li> <li>• Providing places to stop and rest, through the provision of multiple seating and dwelling locations within the landscape.</li> <li>• Providing shade and shelter through optimising the provision of new tree and shrub planting throughout the public realm.</li> <li>• Providing things to see and do with active frontages and uses at ground floor level, a series of attractive destinations within the landscape and elements such as sculptural water feature to animate these spaces.</li> <li>• Creating an improved streetscape in which people can feel relaxed and safe.</li> </ul>	<b>Positive</b> Negative Neutral Uncertain	None required.

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<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Are the open and natural spaces welcoming and safe and accessible for all?	Yes No N/A	As presented within Section 5.2, a majority of the open spaces on site would be publicly accessible, opening up the proposed development for accessibility by the neighbouring WEG development, as well as connecting Harrow Road and Edgware Road with Newcastle Place. <ul style="list-style-type: none"> <li>The open space provided at ground level would be accessible for all, including the public and residents of the proposed development, and the spaces would be designed in such a way to encourage visitors;</li> <li>The public realm within the proposed development would be designed as places for people, where traffic does not dominate, and trees and landscaping are used creatively to provide visual interest and counteract pollution. Furthermore, Newcastle Place would be designed to slow traffic speeds and create a safe and attractive environment for walking and cycling. In this regard, vehicular access along Newcastle Place would primarily be for residential deliveries and limited during the day; and</li> <li>External lighting would be provided and would be supplemented by the use of illuminated bollards to light paths and low-level lighting to greenery and proposed water features.</li> </ul>	Positive Negative Neutral Uncertain	None required.
Does the proposal set out how new open space would be managed and maintained?	Yes No N/A	Each Block would be managed separately by either the occupier or an appointed management company who would take responsibility for any external areas belonging to the development. The proposed would remain in private ownership and as such would be managed during the hours of darkness by the residential concierge facility.	Positive Negative Neutral Uncertain	None required.
<p><b>4. Air Quality, Noise and Neighbourhood Amenity</b></p> <p>Issues to consider within this topic comprise:</p> <ul style="list-style-type: none"> <li>Demolition and construction impacts;</li> <li>Nuisances from poor air quality, noise, vibration and odour; and</li> <li>The provision of open space and trees.</li> </ul> <p>Pollution caused by demolition and construction activities, traffic and commercial activity can have an effect on physical and mental health. Poor air quality is linked to incidence of chronic lung disease, heart conditions and asthma levels among children. Given the prevalence of smoking and deaths from heart disease, understanding these effects are important. Noise pollution can influence health resulting in sleep disturbance, cardiovascular and psycho-physiological effects. Mitigation embedded into the design as well as additional mitigation can lessen noise impacts.</p>				
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes No N/A	A description of the demolition and construction works has been provided within ES Chapter 5: Demolition and Construction Description. <p>The Applicant has committed to the production of a Construction Environmental Management Plan (CEMP) to control emissions from dust during the demolition and construction stage. The CEMP would be secured by means of an appropriately worded planning condition and submitted to the WCC prior to works commencing on-site.</p> <p>Demolition and construction noise and vibration would be controlled through measures set out in the CEMP. This would include measures such as a minimum of 2.8 m hoarding around the site, appropriate siting and regular maintenance of plant and the use of temporary acoustic barriers around specific noise generating activities.</p> <p>Demolition and construction dust would be controlled by the implementation of a dust management plan (DMP) and dust suppression techniques, such as damping down, use of temporary screens, covering of stockpiles etc. The Air Quality assessment has considered that on-site dust monitoring is not required, but will be subject to agreement with WCC.</p>	Positive Negative Neutral Uncertain	None required.

Table 8.1: HUDU Planning Checklist				
Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Actions
Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes No N/A	<p>An assessment of air pollution effects caused by traffic and future energy facilities has been undertaken in ES Chapter 8: Air Quality.</p> <p><i>Demolition and Construction Stage</i></p> <p>An assessment of demolition and construction traffic emissions generated by Heavy Goods Vehicles (HGVs) during the demolition and construction stage has been scoped out on the basis that the predicted number of HGVs would only be five per day travelling on Harrow Road eastbound. This falls well below guidance thresholds required for a full air quality assessment. HGV movements would be controlled through the implementation of a CEMP and CLP, which would be secured by means of appropriately worded planning conditions. The effects of demolition and construction related traffic emissions would be temporary and not of a scale that would give rise to significant effects.</p> <p><i>Completed Development Stage</i></p> <p>The proposed development is a 'car free' development, only providing 18 disabled car parking spaces as required by GLA guidance at basement level. Therefore, traffic emissions from the completed development are considered to be low and not significant.</p> <p>The proposed development's Energy Strategy<sup>34</sup> proposes to connect to the existing WEG energy centre delivered as part of the WEG consented scheme together with the installation of air source heat pumps (ASHP), to provide the heating and cooling load to shell and core areas, and photovoltaic panels (PV) on the roofs of the proposed buildings. WSP has undertaken an assessment of the WEG energy centre which indicate that there is sufficient capacity to serve the proposed development on the assumption that some of the increased energy demand would be provided from the ASHP and PV to be included with the proposed development.</p> <p>An Energy Statement accompanying the application demonstrates how the proposed development would use passive and low energy design technologies to reduce baseline energy demand and carbon dioxide (CO<sub>2</sub>) emissions followed by the application of low and zero carbon technologies.</p> <p>The energy strategies have been designed in accordance with the following energy efficiency hierarchy:</p> <ul style="list-style-type: none"> <li>• Be Lean: Maximise passive design to minimise energy usage: return on investment;</li> <li>• Be Clean: Ensure any technologies added into the building are efficient and well designed; and</li> <li>• Be Green: Once development has been as efficient as possible through passive design, less renewables are required to achieve the energy benchmark, therefore reducing capital cost.</li> </ul> <p>It is expected that the proposed strategy at the Be Lean and Be Clean stages of the Energy Hierarchy will meet the on-site Regulated CO<sub>2</sub> reduction target of 35 % from the London Plan using SAP 10 carbon emission factors for both the residential element and non-residential element of the proposed development.</p>	<p><b>Positive</b></p> <p>Negative</p> <p>Neutral</p> <p>Uncertain</p>	None required.

<sup>34</sup> WSP, 2021. St. Edward Homes LLP. Paddington Green Police Station, Westminster. Energy Statement. Draft Issue. PGPS-WSP-PDF-ES-0001-P01. March 2021.

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<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Does the proposal minimise noise pollution caused by traffic and commercial uses?	Yes No N/A	<p>An assessment of noise pollution effects caused by traffic and commercial uses has been undertaken in ES Chapter 9: Noise and Vibration.</p> <p><i>Demolition and Construction Stage</i></p> <p>During the demolition and construction stage, there would be a low number of HGVs per hour, which would result in a 0.0 decibel change in noise level at noise sensitive receptors.</p> <p>Community liaison and communication regarding demolition and construction works would be undertaken throughout the demolition and construction stage to provide information to people residing in properties adjacent to the demolition and construction works and reduce the likelihood of adverse effects on the local community which could result in potential noise complaints. The level of engagement required would vary during the demolition and construction period, depending upon the expected effects experienced by individual NSRs due to the demolition and construction works.</p> <p>Details relating to liaison with the local community would be managed by the Applicant. It is envisaged that community liaison would provide local residents with the following information in relation to the construction works:</p> <ul style="list-style-type: none"> <li>• The nature of the works being undertaken;</li> <li>• The expected duration of the works;</li> <li>• The contractor's working hours;</li> <li>• Mitigation measures that would be adopted to minimise noise and vibration, as detailed in the CEMP; and</li> <li>• Contact details in the event of a noise disturbance.</li> </ul> <p>Given the Applicant's current delivery of the adjacent WEG development, protocols are very well established.</p> <p>If work is required to extend into periods beyond the agreed hours, separate authorisation would be secured with the WCC via the CEMP process.</p> <p><i>Completed Development Stage</i></p> <p>ES Chapter 9: Noise and Vibration has considered noise impacts on and from the proposed development.</p> <p>Due to the small increase of traffic flows to be generated by the proposed development, no significant change in noise level is predicted.</p> <p>Fixed plant noise and site suitability for residential use have been assessed.</p> <p>Operational plant rating limits have been set in accordance with BS414:2014+A1:2019 and WCC requirements. All fixed plant installations would be fitted with attenuation and acoustic screening, as required to meet the noise emissions limits. This would be secured via a suitably worded planning condition. Mitigation would be developed during detailed design.</p> <p>Likewise appropriate measures have been set in respect of noise transfer between commercial and residential units.</p> <p>Based upon measured noise levels and modelling of the cumulative traffic flow as appropriate, the ambient noise levels on the proposed building facades have been predicted. Minimum sound insulation performance requirements have been provided for the façade to achieve required internal noise levels. This would be further developed during detailed design and secured by means of an appropriately worded planning condition. In respect of external noise levels, all residents would have access to residential amenity space below the required external amenity noise level criteria taking into account the urban context of the site. On this basis the site would be suitable for residential development.</p>	<p><b>Positive</b></p> <p>Negative</p> <p>Neutral</p> <p>Uncertain</p>	None required.
<p><b>5. Accessibility and Active Travel</b></p> <p>Issues to consider comprise:</p> <ul style="list-style-type: none"> <li>• Walking and cycling opportunities within the site;</li> <li>• Access to existing public transport connections;</li> <li>• Discouraging the use of cars;</li> <li>• Proposed streetscape; and</li> <li>• Connection to the wider transport network.</li> </ul> <p>Promoting more sustainable methods of travel such as walking and cycling which increases physical activity and has physical and mental health benefits. Convenient access to a range of services and facilities minimises the need to travel and provides greater opportunities for social interaction. Buildings and spaces that are easily accessible and safe also encourage all groups, including older people and people with a disability, to use them.</p>				



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Does the proposal prioritise and encourage walking (such as through shared spaces?)	Yes No N/A	<p>The design of the public realm has been developed with an emphasis on pedestrian and cycle movement through the site. The landscape has been designed to maximise the extent of soft landscaping and to prioritise pedestrian movement. Generous footways are provided within the site and to the adjacent streetscape allowing freedom of movement, convenient access to and facilitating spill-out uses from adjacent uses. A new pedestrian link located between Blocks I and J would improve connectivity between Harrow Road and Newcastle Place.</p> <p>Cycle stands for short-stay use would be located within the public realm in accordance with TfL London Cycling Design Standards. These would provide cycle parking opportunities adjacent to the various function areas and facilitate passive surveillance and overlooking of parking areas from adjacent uses.</p> <p>Vehicle access would be controlled at the entrance from Edgware Road and restricted to essential servicing and emergency access only. One-way access allows for a narrow carriageway would be incorporated, optimising the amenity value of this route. Off carriageway service and drop-off bays have been incorporated to facilitate day-to-day serving of the proposed development.</p>	Positive Negative Neutral Uncertain	None required.
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes No N/A	<p>Cycle routes through the proposed development would offer logical and convenient connections to and between key destinations beyond the site boundary and would take account of both existing and proposed destinations.</p> <p>The proposed development would provide a minimum of 960 long stay cycle parking spaces and 86 short stay spaces in accordance with London Plan standards. Cycle parking for each block would be provided in excess of WCC cycle parking requirements and the allocated numbers would be in line with GLA/TfL requirements. Long stay residents parking would be provided at basement level in secure cycle stores.</p> <p>Cycle stores would be accessible via lifts from the residential cores. In addition, cycle changing facilities would be provided.</p> <p>Cycle racks for short-stay casual use would be distributed within the public realm across the site. In total 86 short stay cycle spaces would be provided in accordance with the London Plan standards. Short stay visitor cycle parking would be located on the Edgware junction, Edgware Road and Harrow Road frontages.</p> <p>The Applicant would develop Travel Plans to encourage the use of non-car modes of travel and ensure the sustainability of the proposed development. The Travel Plans would provide a package of measures to encourage commercial users, staff and residents to use alternatives to single-occupancy car-use. In terms of cycling, the measures would include the following:</p> <ul style="list-style-type: none"> <li>• Provision of secure cycle parking for residents, staff and visitors; and</li> <li>• Regular monitoring of cycle parking use.</li> </ul> <p>The Travel Plans would be secured by means of an appropriately worded planning condition.</p>	Positive Negative Neutral Uncertain	None required.
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes No N/A	<p>The proposed development would provide new routes across the site for pedestrians and cyclists, linking into existing routes and enhancing access to key destinations in the local area. Access into the site and the principle connections through would be designed to be easy to use, public in nature and accessible for all.</p>	Positive Negative Neutral Uncertain	None required.
Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	Yes No N/A	<p>Vehicular access to the site would be from Newcastle Place, directly off Edgware Road. Vehicular movements would be restricted to essential servicing and emergency access only.</p> <p>Servicing and deliveries at the proposed development would take place in two main locations:</p> <ul style="list-style-type: none"> <li>• Day-to-day deliveries and drop off would take place at the main site entrance on Newcastle Place, directly off Edgware Road, via the dedicated loading bays at grade.</li> <li>• All other servicing would be via the basement levels accessed off Church Street as part of the WEG development. The service area would act as a point of contact for refuse delivery and collection.</li> </ul> <p>When servicing to residential units is required, these would be accessed via the residential lifts through core connections in the basement levels.</p> <p>The concierge management of the site would maintain and manage day-to-day operations.</p>	Positive Negative Neutral Uncertain	None required.



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Is the proposal well connected to public transport, local services and facilities?	Yes No N/A	Based on the TfL on-line PTAL calculator, the site has a PTAL rating of 6b, which equates to an 'Excellent' public transport accessibility. The Edgware Road London Underground Station (which is served by the Bakerloo Line) is located approximately 50 m to the east of the site. Paddington Mainline Station is located approximately 400 m to the south-west.  There are also good bus, pedestrian and cycle routes in the vicinity of the site, with the following three London Cycle Network (LCN) routes in the locality of the site: <ul style="list-style-type: none"> <li>• Route 50 which provides a link between Marylebone and Hendon;</li> <li>• Route 5 links Edgware and Battersea; and</li> <li>• Route 36 provides links to Twickenham and Hammersmith.</li> </ul>	Positive Negative Neutral Uncertain	None required.
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Yes No N/A	The proposed development would be 'car free', excluding disabled, service, delivery and drop off vehicles, and therefore car movement to and from the site would be minimal.  As described previously, the vehicular access to the site would be from Newcastle Place, directly off Edgware Road. Vehicular movements would be restricted to essential servicing and emergency access only.  The Applicant would develop Travel Plans to encourage the use of non-car modes of travel and ensure the sustainability of the proposed development. The Travel Plans would provide a package of measures to encourage commercial users, staff and residents to use alternatives to single-occupancy car-use. The Travel Plans would be secured by means of an appropriately worded planning condition.	Positive Negative Neutral Uncertain	None required.
Does the proposal allow people with mobility problems or a disability to access buildings and places?	Yes No N/A	All aspects of the proposed development would incorporate the principles of Inclusive Design, so that everyone can access homes, streets, spaces and communal uses easily. This includes those with disabilities, including wheelchair users, blind and partially sighted people, but also the elderly, people with pushchairs and those walking with small children.  The site is a flat urban site, where changes of level occur, ramps, disabled lift and Part M compliant steps would be delivered to accommodate the change in level. All main cores to the different residential building blocks are fitted with wheelchair accessible lifts that provide level access to all floors and all escape stairs will have allocated space for disabled refuge.  A disabled list would be provided to access the residents garden.	Positive Negative Neutral Uncertain	None required.
<b>6. Crime Reduction and Community Safety</b> <b>Issues to consider comprise:</b> <ul style="list-style-type: none"> <li>• The safety of future residents and users of the proposed development; and</li> <li>• The inclusivity of the site for all, preventing gated communities.</li> </ul>				
Does the proposal incorporate elements to help design out crime?	Yes No N/A	The lighting strategy has been designed to create a well-lit area, reducing the risk of crime and providing a sense of safety at all times. It is envisaged that pedestrian footfall would predominantly be along Edgware Road, Newcastle Place and Church Street and the employment of CCTV and lighting incorporated discretely into the soffit at first floor level would help to mitigate any threats. CCTV would also be employed to control and maintain access to basement parking facilities. A good level of management and maintenance would discourage crime in the area. The operational management and security procedures carried out by concierge staff will consider the safety and security of the development.  Further consultation with the Metropolitan Police would take place post submission and the details associated with Designing Out Crime would be developed further.	Positive Negative Neutral Uncertain	None required.

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Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Yes No N/A	The public realm proposals for the proposed development provide for functional streets and publicly accessible spaces to all faces of the development. Public realm improvements are proposed which focus on people and their health, help everyone to use cars less and to walk, cycle and use public transport more, in line with TfL's 'Healthy Streets for London' initiative.  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 would support and promote spill-out uses at ground level.  The private amenity spaces for residents use only are limited to the landscaped roof terraces at Blocks J and K.	Positive Negative Neutral Uncertain	None required.
Does the proposal include attractive, multi-use public spaces and buildings?	Yes No N/A	The proposed development would facilitate the regeneration the site, whilst delivering wider benefits to the neighbourhood; delivering high quality architecture and high-quality public realm.  The provision of residential units, office space and retail units would ensure a wide range of multi-use public spaces are provided.  Blocks J and K would provide office space with two commercial amenity terraces at level one and two. Residential units would follow from the third level upwards.	Positive Negative Neutral Uncertain	None required.
Has engagement and consultation been carried out with the local community?	Yes No N/A	The design of the proposed development was informed and has evolved through the help of numerous consultation meetings, presentations to WCC, stakeholder groups and local residents.  The main concerns from the public were consolidated into the following four categories: <ul style="list-style-type: none"> <li>• Building Height and Affordable Homes <ul style="list-style-type: none"> <li>- Concerns around excessive bulk and mass;</li> <li>- Further clarification required on the provision of affordable housing; and</li> <li>- Homes and where these would be located within the proposals.</li> </ul> </li> <li>• Traffic and Parking <ul style="list-style-type: none"> <li>- Concerns with more residents moving into the area and potential impact on traffic and parking.</li> </ul> </li> <li>• Urban Realm ad Crime Reduction <ul style="list-style-type: none"> <li>- Importance of ensuring the area is safe and useable for both pedestrians and cyclists; and</li> <li>- Concerns with regards to crime rates.</li> </ul> </li> <li>• Green Space, Connectivity and Environment <ul style="list-style-type: none"> <li>- Useable green spaces accessible for all; and</li> <li>- Concerns for residents living next to the Westway.</li> </ul> </li> </ul> <p>The verbal and written feedback provided by local stakeholders as part of the consultation process has directly fed into the evolution of the proposed development. The design evolved in response to the feedback from the local community as follows:</p> <ul style="list-style-type: none"> <li>• Amendments to the massing;</li> <li>• Incorporation of affordable workspace;</li> <li>• Block K façade treatment evolution; and</li> <li>• Further design development to ensure the public realm was a safe and welcoming space.</li> </ul>	Positive Negative Neutral Uncertain	None required.
<p><b>7. Access to Healthy Food</b></p> <p>Issues to consider comprise:</p> <ul style="list-style-type: none"> <li>• Provision of hot food takeaways; and</li> <li>• Availability of allotments and community food growing spaces.</li> </ul> <p>Opportunities to grow and purchase local healthy food and limiting concentrations of hot food takeaways can change eating behaviour and improve physical and mental health. Another benefit of a community food growing space or allotment is the contribution towards social cohesion. Access to healthy and nutritious food can help improve diet and prevent issues relating to obesity, which is important given the elevated levels of deaths within the local area due to cardiovascular disease.</p>				

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Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	Yes <b>No</b> N/A	It is likely that the flexible commercial uses could include small scale retail uses (Class E town centre uses, including small scale food shops/deli's and café/restaurant uses). Due to the constrained nature of the site, allotments, community farms and farmers' markets would not be viable options.	Positive Negative <b>Neutral</b> Uncertain	None required.
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	<b>Yes</b> No N/A	The proposed development seeks to provide 1,088 m <sup>2</sup> of flexible commercial floorspace. This could include retail uses, delivered along Harrow Road at ground level. The affordable workspace would be located adjacent to Paddington Green in Block I.	<b>Positive</b> Negative Neutral Uncertain	None required.
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area?	<b>Yes</b> No N/A	No hot food takeaways are proposed.	<b>Positive</b> Negative Neutral Uncertain	None required.
<b>8. Access to Work and Training</b>				
Issues to consider comprise:				
<ul style="list-style-type: none"> <li>The potential generation of employment during the demolition and construction stage as well as the completed development stage.</li> </ul>				
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	<b>Yes</b> No N/A	<p><i>Demolition and Construction Stage</i></p> <p>The build out period for the proposed development is predicted to be between February 2022 and July 2028, totalling 83 months. The total employment over a 12-month term would be approximately 1,383 demolition and construction jobs based on the capital construction costs. Based on a total demolition and construction period of approximately 83 months (dependent on the market requirements at the time of construction); the total average employment generated would be approximately 200 construction jobs over the duration of the demolition and construction stage. Taking into account leakage, multiplier factors and displacement, 79 net jobs would be created.</p> <p>Local training opportunities would be offered as part of the demolition and construction stage, through the code of construction practice condition and S106 skills and training obligations.</p> <p><i>Completed Development Stage</i></p> <p>The proposed flexible commercial space on-site would support jobs and local communities, as well as promote a mixed-use development to connect local residents with new employment opportunities.</p> <p>Based on the proposed development's non-residential floorspace 358 - 374 full time equivalent employment opportunities would be generated. However once displacement, multiplier factors and displacement are considered, there would be a net gain of 133-139 operational employment opportunities to the local area.</p>	<b>Positive</b> Negative Neutral Uncertain	None required.
Does the proposal provide childcare facilities?	Yes No <b>N/A</b>	No, the proposed development would not provide childcare facilities.	Positive Negative <b>Neutral</b> Uncertain	None required.
Does the proposal include managed and affordable workspace for local businesses?	<b>Yes</b> No N/A	Yes, the proposed development would provide non-residential floorspace in the form of flexible commercial, office and affordable workspace. This was introduced into the proposed development design in response to comments and feedback received during the consultation process to provide a space that would be beneficial to the local community.	<b>Positive</b> Negative Neutral Uncertain	None required.
Does the proposal include opportunities for work for local people via local procurement arrangements?	<b>Yes</b> No N/A	The Applicant would commit to maximise local recruitment through enhancement measures which would include commitment to advertise job vacancies in local job agencies and newspapers in accordance with 'local and relevant postcodes' to maximise those employed locally. This would be delivered through the code of construction practice requirements and S106 obligations.	<b>Positive</b> Negative Neutral Uncertain	None required.

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<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
<p><b>9. Social Cohesion and Lifetime Neighbourhoods</b></p> <p>Issues to consider:</p> <ul style="list-style-type: none"> <li>• Social interaction;</li> <li>• Mixed communities;</li> <li>• Access to community facilities; and</li> <li>• Community severance.</li> </ul> <p>Fragmentation of social structures can lead to communities which are separated by age, ethnicity, or socio-economic status, which can lead to isolation, insecurity and lack of cohesion.</p> <p>Lifetime Neighbourhoods places the design criteria of Lifetime Homes into a wider context. It encourages design teams to help create environments that people of all ages and abilities can access and enjoy, and to facilitate communities that people can participate in, interact and feel safe.</p>				
Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	Yes No N/A	<p>The proposed development would create new public realm and improve permeability across the site and to the wider pedestrian network. An environment that is comfortable, safe and desirable for all users would be delivered. The proposed open space at ground level would be accessible for all, including the public and residents of the proposed development, and the spaces would be designed to encourage use by occupiers of on-site and off-site commercial areas.</p> <p>The connection to the existing WEG development to the north is a major benefit to introduce community cohesion across both developments. The connected landscaping strategy, mirrored architecture and connected basement ensures this. There would be no pedestrian barriers, as the pedestrian network would be widened.</p> <p>Frontages to Blocks would include spill-out spaces for active ground floor uses, offering amenity value and acting as a transition zone between public space and internal activities. The proposed development would provide new routes across the site for pedestrians and cyclists, linking into existing routes and enhancing access to key destinations in the local area.</p>	Positive Negative Neutral Uncertain	None required.
Does the proposal include a mix of uses and a range of community facilities?	Yes No N/A	The proposed development would offer a range of uses that the on-site residents and local community can use, consisting of retail, commercial and community floorspace (affordable workspace).	Positive Negative Neutral Uncertain	None required.
Does the proposal provide opportunities for the voluntary and community sectors?	Yes No N/A	The proposed development would provide affordable workspace, which could provide opportunities for voluntary and community sectors.	Positive Negative Neutral Uncertain	None required.
Does the proposal address the six key components of Lifetime Neighbourhoods?	Yes No N/A	<p>Lifetime neighbourhoods are places where people are able to live and work in safe, healthy, supportive and inclusive environments with which they are proud to identify<sup>35</sup>.</p> <p>The proposed development addresses the following six key components of Lifetime Neighbourhoods<sup>36</sup>:</p> <ul style="list-style-type: none"> <li>• Supporting residents to develop lifetime neighbourhoods – especially resident empowerment;</li> <li>• Access;</li> <li>• Services and amenities;</li> <li>• Built and natural environments;</li> <li>• Social networks/well-being; and</li> <li>• Housing.</li> </ul> <p>The proposed development would deliver the comprehensive regeneration of the site, whilst delivering wider benefits to the local neighbourhood. Furthermore, the proposed development would generate employment at the demolition and construction stage, as well as the completed development stage.</p>	Positive Negative Neutral Uncertain	None required.

<sup>35</sup> Greater London Authority, 2015. Social Infrastructure Supplementary Planning Guidance.

<sup>36</sup> Department for Communities and Local Government. Lifetime Neighbourhoods. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6248/2044122.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf).

Table 8.1: HUDU Planning Checklist				
Assessment Criteria	Relevant?	Details/Evidence	Potential Health Impact?	Recommended Mitigation or Enhancement Actions
<p><b>10. Minimising the Use of Resources</b></p> <p>Issues to consider comprise:</p> <ul style="list-style-type: none"> <li>Existing use of the land;</li> <li>Opportunities for recycling and reuse</li> <li>Sustainable construction; and</li> <li>Waste management.</li> </ul> <p>Reducing or minimising waste including disposal, processes for construction as well as encouraging recycling at all levels can improve human health directly and indirectly by minimising environmental impact, such as air pollution.</p>				
Does the proposal make best use of existing land?	<p><b>Yes</b></p> <p>No</p> <p>N/A</p>	<p>The Applicant's objective for the proposed development is to provide a high-quality, residential-led, mixed-use development that realises the full potential of the site.</p> <p>The site is within the Paddington Opportunity Area in which the London Plan seeks the delivery of 1,000 new homes and 13,000 new jobs. The current site as the dormant PGPS does not generate any employment and does not provide any visual or townscape amenity.</p> <p>The proposed development would make efficient use of the site by delivering 556 new homes and a new mixed-use cluster of 6,178 m<sup>2</sup> of flexible commercial floorspace, office floorspace, and affordable workspace.</p>	<p><b>Positive</b></p> <p>Negative</p> <p>Neutral</p> <p>Uncertain</p>	None required.
Does the proposal encourage recycling (including building materials)?	<p><b>Yes</b></p> <p>No</p> <p>N/A</p>	<p><i>Demolition and Construction Stage</i></p> <p>Due to the potential for contamination, it is estimated that 80 % of demolition and construction waste would be recycled off-site or re-used on-site subject to contamination testing.</p> <p>The other remaining demolition materials would be removed from the site. A SWMP would be detailed within the CEMP to be prepared prior to demolition and construction works commencing on-site.</p> <p><i>Completed Development Stage</i></p> <p>Appropriate and sufficient dedicated storage space for refuse and recyclable waste generated by the residents and tenants of the proposed development would be provided for each building. This would enable appropriate management of waste disposal during the proposed development's operation.</p> <p>Each individual residential unit would be provided with a segregated waste bin. The segregated waste bin would include sufficient individual receptacles to allow the segregation of the waste in accordance with the WCC Guidance. The following bin capacities would be included; 30 litres for dry mixed recyclables and 19 litres for refuse.</p> <p>In addition to a segregated waste bin, WCC would provide a suitable food waste caddy for the collection and storage of food waste.</p> <p>The total estimated residential waste arising for the proposed development has been calculated to be 100 litres per bedroom per week sourced from WCC planning guidance Recycling and Waste Storage Requirements. This would comprise:</p> <ul style="list-style-type: none"> <li>30 litres per bedroom per week for general waste;</li> <li>60 litres per bedroom per week for dry mixed recycling; and</li> <li>10 litres per bedroom per week for food waste.</li> </ul>	<p><b>Positive</b></p> <p>Negative</p> <p>Neutral</p> <p>Uncertain</p>	None required.

<b>Table 8.1: HUDU Planning Checklist</b>				
<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Does the proposal incorporate sustainable design and construction techniques?	Yes No N/A	The proposed development would be delivered on previously developed land. The proposed scale and density aim to maximise the potential of the site, while considering the local context.  All materials would be specified in accordance with the Berkeley Group Sustainable Specification and Procurement Policy. This includes a preference for materials: <ul style="list-style-type: none"> <li>• with low environmental impact;</li> <li>• with high recycled content;</li> <li>• locally available;</li> <li>• certified by an environmental/responsible sourcing scheme; and</li> <li>• that help to mitigate issues such as climate change, ecological damage, waste production, water scarcity.</li> </ul> In addition, all timber will be FSC or PEFC certified (demonstrated by a Chain of Custody). There would be 100 % LED lighting in all homes and communal areas.	Positive Negative Neutral Uncertain	None required.
<p><b>11. Climate Change</b></p> <p>Issues to consider for the topic comprise:</p> <ul style="list-style-type: none"> <li>• the comfort of future residents within the proposed development with reference to future changes to winter and summer temperatures; and</li> <li>• the accessibility of biodiverse areas for the future users of the proposed development.</li> </ul>				
Does the proposal incorporate renewable energy?	Yes No N/A	A Energy Statement accompanying the application demonstrates how the proposed development would use passive and low energy design technologies to reduce baseline energy demand and CO <sub>2</sub> emissions followed by the application of low and zero carbon technologies. Photovoltaic (PV) panels would be provided on Blocks I and K. The roof space would accommodate approximately 123 m <sup>2</sup> of PVs. This would equate to a CO <sub>2</sub> saving of approximately 8.1 tonnes CO <sub>2</sub> per year.  The energy strategies have been designed in accordance with the following energy efficiency hierarchy: <ul style="list-style-type: none"> <li>• Be Lean: Maximise passive design to minimise energy usage: return on investment;</li> <li>• Be Clean: Ensure any technologies added into the building are efficient and well designed; and</li> <li>• Be Green: Once development has been as efficient as possible through passive design, less renewables are required to achieve the energy benchmark, therefore reducing capital cost.</li> </ul>	Positive Negative Neutral Uncertain	None required.
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?	Yes No N/A	Passive design measures would be incorporated into the design to reduce energy demand and the risk of overheating.  The architectural geometry, glazing area and shading elements provided in the facade are designed to maximise the passive measures, to mitigate overheating issues and maximise daylight and sunlight access within the proposed apartments.  To mitigate the risk of overheating cooling in the private apartments would be provided Air Cooled Chillers (ACC) located on the roof of Block I. Distributed chilled water (CHW) would serve cooling interface units (CIU) within each apartment which would then serve high-efficient FCU located in each apartment.  An in-line direct expansion cooling module would be integrated into the MVHR to mitigate the risk of overheating in the summer months within the affordable apartments.  Mechanical ventilation would be provided in the office floors and the landlord areas to ensure sufficient ventilation can be provided at all times. Low specific fan power air handling units with heat recovery would be specified to reduce the energy demand associated with the mechanical ventilation systems.  The façade of Blocks I, J and K would incorporate solar control glazing to reduce the amount of solar heat entering apartments.  Within the public realm, appropriate furniture would be used for outside seating.	Positive Negative Neutral Uncertain	None required.

<b>Table 8.1: HUDU Planning Checklist</b>				
<b>Assessment Criteria</b>	<b>Relevant?</b>	<b>Details/Evidence</b>	<b>Potential Health Impact?</b>	<b>Recommended Mitigation or Enhancement Actions</b>
Does the proposal maintain or enhance biodiversity?	Yes No N/A	<p>A Biodiversity Net Gain Assessment has been undertaken of the proposed development which has quantified the level of biodiversity change from the existing site to the proposed development. The increase in biodiversity has been calculated at 6,157 %. These biodiversity gains would be significantly more than the 10% net gain required by planning policy for area-based habitats and singular/street trees.</p> <p>The biodiverse roof garden at Block K with open-mosaic type habitat, would have a species mix comprising at least 20 species and include plants of known benefit for pollinators, including a number listed on the Royal Horticultural Society's (RHS) 'Plants for Pollinators' list. Additional biodiversity features would be incorporated onto the roof such as log piles, stone piles and sand to attract invertebrates and provide nesting habitat for them. Invertebrate boxes or 'bee hotels' are proposed and would provide additional interest and enhancement for invertebrates such as bees.</p> <p>The provision of landscape planting within the redevelopment would provide new habitat for use by foraging and nesting birds, enhancing the site for birds. Furthermore, a variety of bird nest box types would be provided at suitable locations on the site, attached to or built within buildings and other infrastructure, as mitigation for loss of habitat and additional enhancement. Boxes suitable for house sparrow, starling and swifts would be included.</p>	<p><b>Positive</b> Negative Neutral Uncertain</p>	None required.
Does the proposal incorporate sustainable urban drainage techniques?	Yes No N/A	<p>It is proposed to use green roofs as the primary sustainable drainage strategy (SuDS) feature for the development and would be provided on Blocks J and K, as well as green areas on top of the podium slab.</p> <p>Surface water attenuation would be in the form of two separate attenuation tank systems located at basement, B1 slab. Stored water from the two tanks would then be pumped at restricted rates to the ground level via a rising main, where it would then discharge via gravity to the Thames Water combined sewer in Newcastle Place.</p> <p>Based on a greenfield runoff rate of 4.86 l/s as a limiting discharge rate for the proposed development, a total attenuation storage volume of approximately 603 m<sup>3</sup> is required to achieve a greenfield runoff rate reduction for up to the 1 in 100 year + 40% Climate Change Storm event.</p>	<p><b>Positive</b> Negative Neutral Uncertain</p>	None required.



## 9. CONCLUSION

The assessment of the proposed development against the HUDU Rapid HIA Tool Planning checklist in Table 8.1 demonstrates the positive impacts and effects that would be delivered in respect of health.

Through the regeneration of the site, the proposed development would provide:

- a more sustainable use of the site;
- access to housing and employment would be created;
- a significant biodiversity net gain (over 6,000 %) would be provided;
- new links to the neighbouring WEG development would be provided which would increase neighbourhood cohesion;
- the use of more sustainable modes of transport and active lifestyles promoted.

Vulnerable groups identified within Section 3, road users within the surrounding network and obese children, would benefit from improved open space and play space, prioritised walking and cycling space, safe and secure public realm, as well as access to commercial and employment opportunities.

Key health statistics within the borough and Local Area and evidence as to how the proposed development would contribute towards reducing these concerns are as follows:

- 'Killed and seriously injured' rate on England's roads – provision of public realm improvements which would provide enough space for pedestrian movement. Furthermore, predicted vehicle trips would not lead to increased risk of accidents on the local highway network;
- Children in Year 6 prevalence of obesity – on-site amenity spaces and playspace provision would provide opportunities for exercise and inclusive play;
- Percentage of children in low income families – the provision of employment opportunities and 38 % of the residential units would be affordable housing which would provide increased socio-economic security; and
- Violent crime – the proposed development would replace the current under-utilised site and deliver a high-quality scheme that has been designed in accordance with Safety by Design standards.

The proposed development would meet all of the criteria of the Sports England Active Design guidance and would optimise opportunities for active and healthy lifestyles.

The HIA recommends the following actions:

- Direction of financial contributions towards healthcare and secondary school provision;
- A detailed CEMP to be secured by an appropriately worded planning application; and
- A Travel Plan to be secured by an appropriately worded planning condition.

It can be concluded that the proposed development has taken health and wellbeing into consideration in its design and would positively contribute towards the creation of healthy and sustainable communities.



