



PADDINGTON GREEN
POLICE STATION

Transport Assessment

Transport Assessment - January 2023 -
GLA0711 AMND Rev 01 January 2023

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Berkeley Homes (Central London) Limited

Paddington Green Police Station

Transport Assessment

Reference: PGPS/TA

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

Job number 277685-14

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1. Introduction

1.1 Background

Ove Arup & Partners ('Arup') has been commissioned by Berkeley Homes (Central London) Limited to provide transport advice to support the redevelopment of Paddington Green Police Station (PGPS).

The local planning and highways authority is Westminster City Council (WCC). The highways authority for A5 Edgware Road and the very eastern section of A404 Harrow Road leading up to the junction with the A5 is Transport for London (TfL).

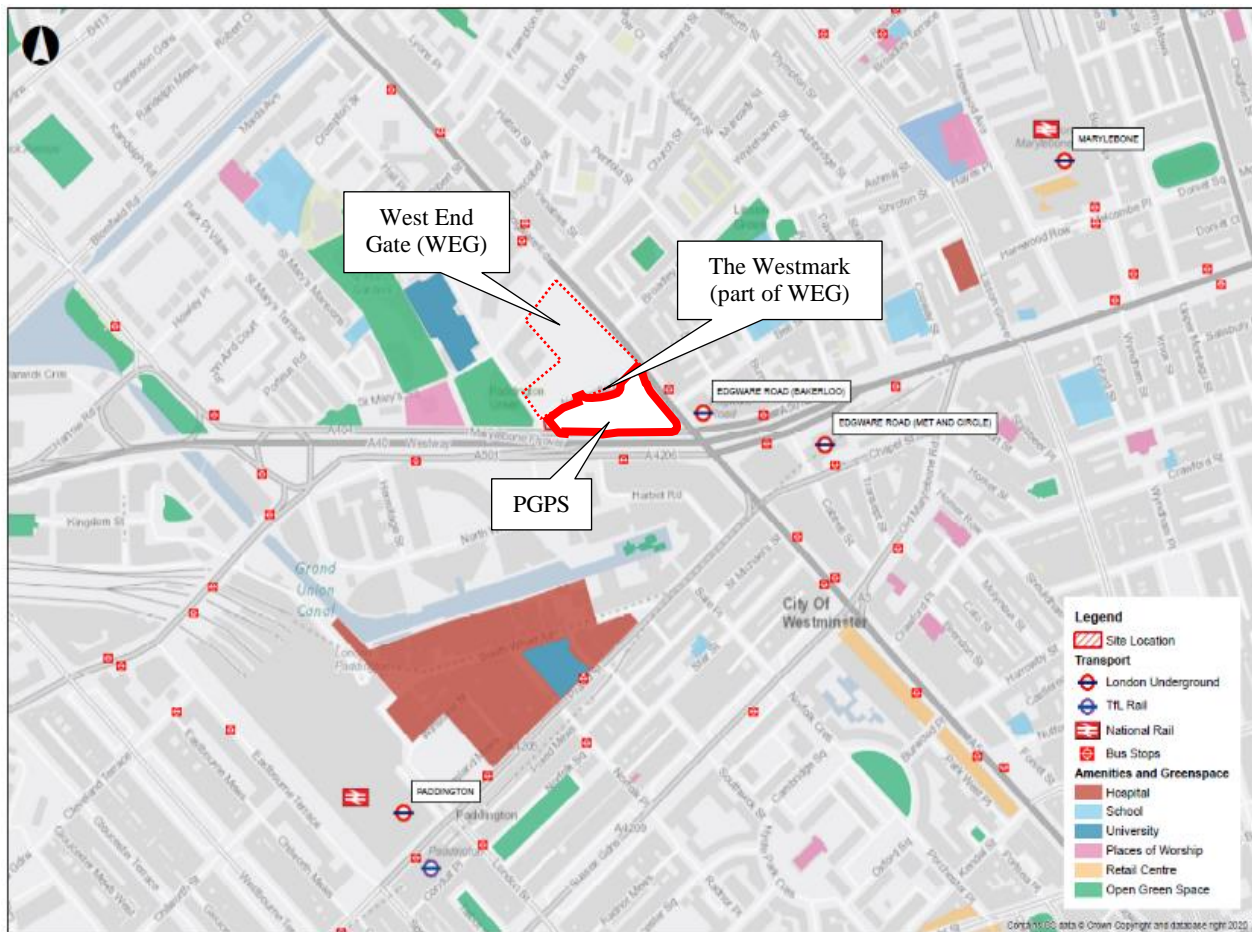
A planning application for the same site was submitted in April 2021 (Ref: 21/02193/FULL). A Transport Assessment (TA) was prepared to support the April 2021 planning application. Where of continued relevance between the former and current application, this TA includes a response to the comments received from TfL, WCC and the stakeholders associated with the 2021 TA. The TfL post submission comments received in July 2021 are included in Appendix A of this report. Where within this report 'the proposed development' or 'the redevelopment proposals' are referred to, this relates to the November 2022 submission.

1.2 Site location

The site is bounded by Edgware Road to the east, A404 Harrow Road to the south, Paddington Green to the west and Newcastle Place to the north. The site location is shown in Figure 1.

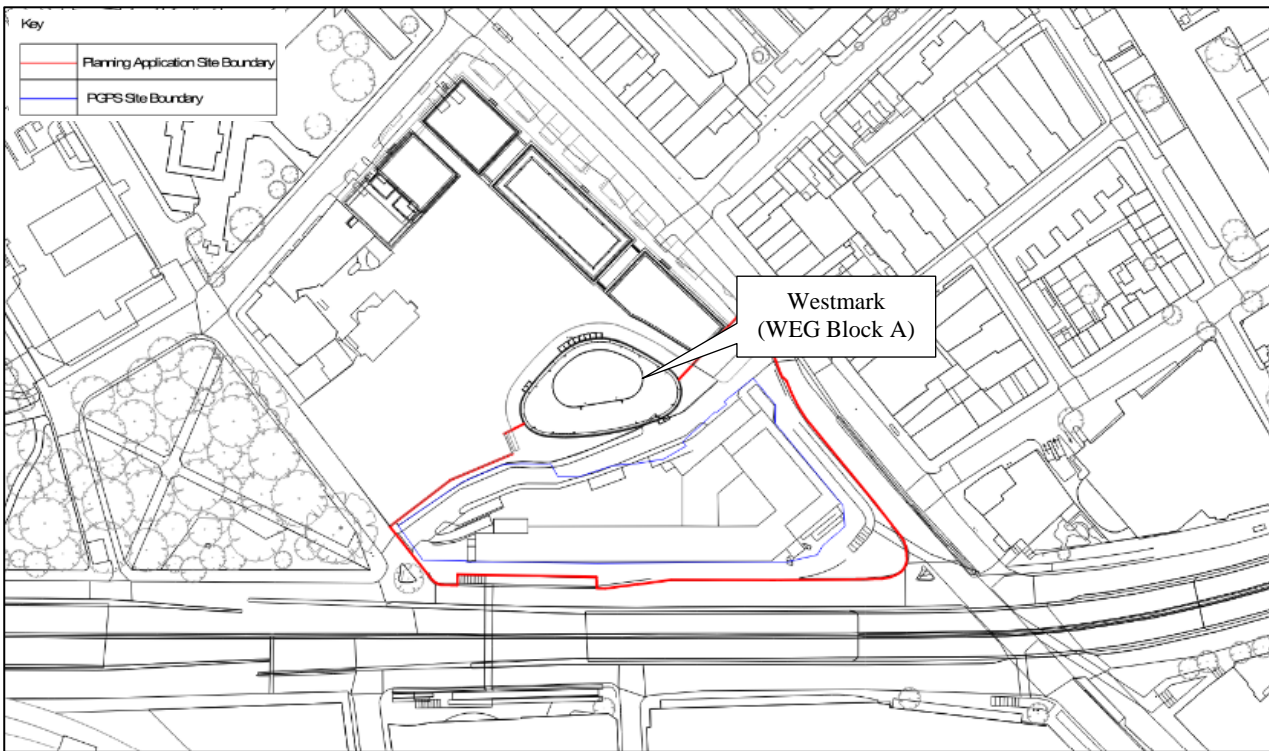
To the north of Newcastle Place is a development known as West End Gate (WEG) which is currently under construction by Berkeley Homes. WEG will provide a total of 844 new homes, as well as retail and restaurant land uses. WEG includes the associated 14-17 Paddington Green development. Block A of WEG, known as The Westmark, the 30-storey tower, is located to the north of Newcastle Place, directly opposite the site. A double basement (levels B1 and B2) is provided at WEG which is accessed from Church Street. The proposed development will complement the adjacent WEG development and create a destination within Westminster.

Figure 1: Site location plan



The site ownership and red line boundary is presented in Figure 2.

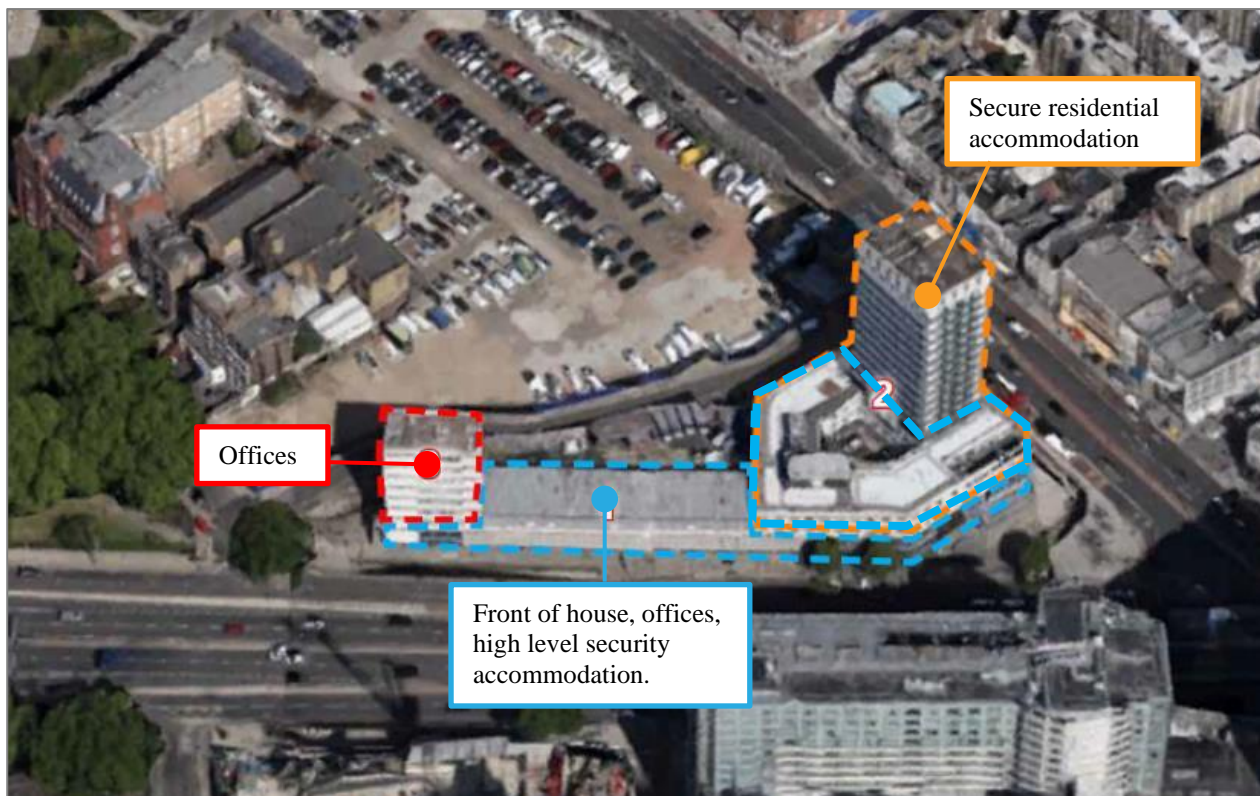
Figure 2: Site ownership and red line boundary plan



1.3 Former and consented use of the site

The police station building has sui generis land use class and can be considered in three parts as shown in Figure 3. The buildings formerly accommodated offices, secure residential accommodation for the police station and front of house including secure cells. There is car parking provided at basement and podium levels, with access provided from Newcastle Place (see Section 3.4.1). A small loading area is also accessed from Newcastle Place. The police station ceased operation in 2018.

Figure 3: Aerial view of Paddington Green Police Station



A change of land use class application was consented (December 2020) (Ref: 20/06727/FULL) for the western tower of the police station, from sui generis to land use class E. It has been occupied as office use from February 2021 through to February 2022, as per its former use as offices for the police station.

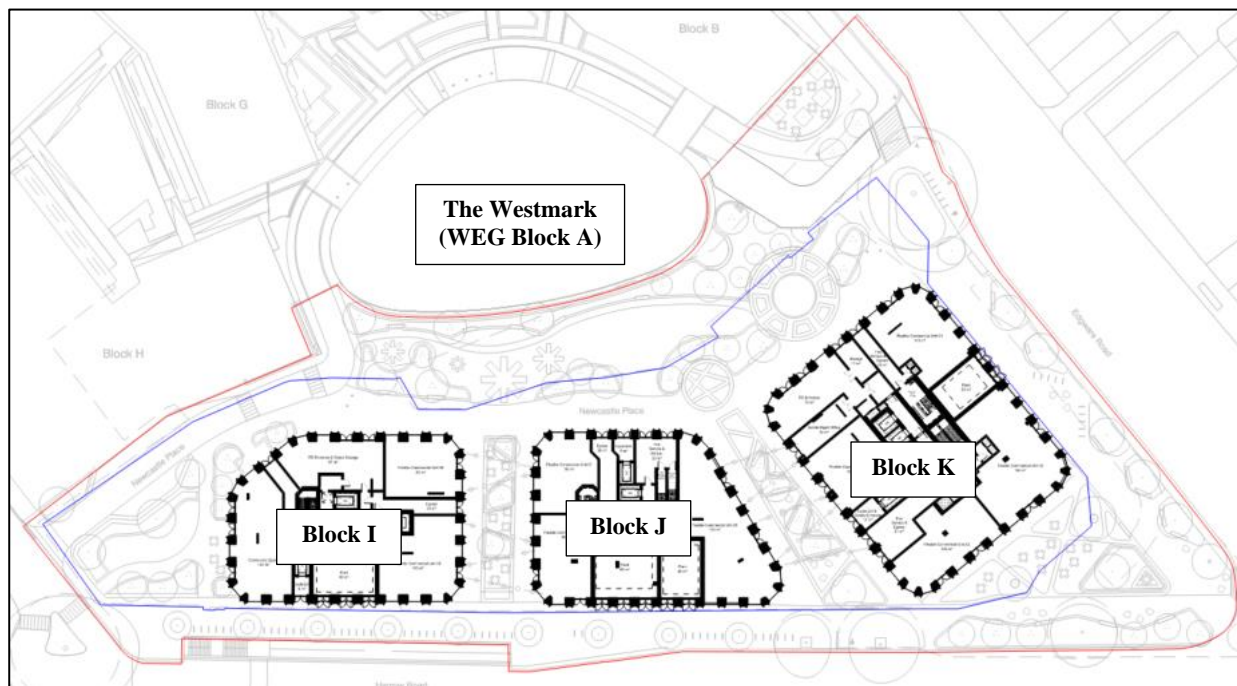
1.4 Development proposal summary

The development proposals comprise demolition of the existing building and redevelopment of the site to provide three buildings of 39, 24 and 17 storeys in height, providing residential units (including affordable units)(Class C3), commercial uses (Class E), a community use (Class F.2), 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, disabled car parking and cycle parking and connection through to the basement of the neighbouring West End Gate development.

The proposed scheme comprises of three blocks (Block I, J and K, as a continuation of the naming of the blocks being delivered at WEG), as shown in Figure 4, and will provide the following:

- 556 new homes
- Flexible commercial / retail (1,079 sqm GIA; 1,215 sqm GEA)
- Community space (133 sqm GIA; 150sqm GEA)

Figure 4: Proposed site plan



Long stay cycle parking and disabled car parking are proposed at the basement level. Cycle parking accesses to the basement are located on Harrow Road and Newcastle Place. The proposed car parking is accessed via the WEG basement from Church Street.

Short stay cycle parking will be in the public realm. Delivery and servicing are proposed to take place in the WEG basement and along the loop street to the north of The Westmark.

1.5 Compliance with Healthy Streets, Vision Zero, and Mayor's Transport Strategy principles

In accordance with TfL's Healthy Streets Transport Assessment guidance, this section outlines how the proposed scheme will support Healthy Streets, Vision Zero, and the *Mayor's Transport Strategy* (2018), as well as how strategic transport policies will be delivered and how transport planning has contributed to the design.

The design and layout of the site follows TfL's Healthy Streets approach, which prioritises active and sustainable travel. New pedestrian and cyclist access points will be created into the site, which will increase the permeability of the site and improve its connections with the local area. These access points and associated routes will be direct, attractive and of high quality, which will help to create a place where people feel relaxed and safe, and will encourage the use by members of the public.

The proposed car-free (with the exception of accessible parking) development is in accordance with the *London Plan* (2021) and WCC's *City Plan* (2021) policies. It is expected that the residents and other users of the site would have higher propensity to travel sustainably using the wide range of existing public transport services available near the site, as well as walking or cycling. This is in accordance with the key aim of the *Mayor's Transport Strategy* (2018) to achieve 80% of all trips in London to be made on foot, by cycle or using public transport by 2041. The target mode share for central London is even higher (c. 95%). In addition, long-stay and short-stay cycle parking will be provided in accordance with the *London Plan* standards, accommodating and encouraging cycling as a sustainable and active mode choice.

Internal routes within the site will incorporate the principles of 'safe streets', within the *Vision Zero Action Plan* (2018). The routes will provide a pleasant walking environment that prioritises pedestrians, with reduced clutter and high quality hard and soft landscaping compared with the existing provision. The TfL Safer Junction scheme (discussed in later chapters) has upgraded the Edgware Road / Harrow Road junction, reducing the likelihood of collisions with vehicles at crossings, as well as creating a better and safer environment for pedestrian and cyclists.

1.6 Wider policy context

The following policy guidance informed the preparation of the Transport Assessment (TA), they include:

- National Planning Policy Framework (NPPF) (MHCLG, 2021)
- London Plan (GLA, 2021)
- The Mayor's Transport Strategy (GLA, 2018)
- TfL's Healthy Street Transport Assessment guidance (TfL, 2019)
- London Cycle Design Standards (TfL, 2014)
- Westminster City Council's City Plan 2019-2040 (WCC, 2021)
- Westminster City Council Code of Construction Practice (WCC, 2022)
- Westminster City Council Recycling and Waste Storage Requirements (WCC, 2021)

1.7 Consultation

A Transport Assessment Scoping Report was prepared and issued to WCC and TfL in October 2020 for the former application. Pre-application meetings also took place between September 2020 and March 2021 to discuss the proposals. Although the discussion was related to the former application, the consultation remains largely relevant for the new application.

Further pre-application meetings with GLA and TfL were undertaken to discuss the changes in the new proposals, including the design for Newcastle Place and revised arrangements related to the servicing strategy principles set out and agreed with WCC for the April 2021 application.

All comments received from WCC and TfL from post-application of the former application and in the pre-application stage of the new application were considered and informed the design development of the proposed scheme and the contents of this TA. Trip generation and principles of access were agreed.

1.8 Report structure

In accordance with the TfL Healthy Streets Transport Assessment guidance, this TA is structured as follows:

- **Chapter 2: Transport planning for people** – sets out who the development is for, how they will travel there and why;
- **Chapter 3: Site and surroundings** – sets out how people of all abilities will move around the site and its immediate surroundings. It covers access by all relevant modes of transport, public realm space, and servicing and parking, for both the existing and proposed situation;
- **Chapter 4: Active Travel Zone (ATZ)** – contains the assessment of how people will make key journeys by active modes within the ATZ to support a car-free lifestyle. This chapter also includes a review on alternative route choice for site users that wish to travel at night time;
- **Chapter 5: London-wide network** – sets out the trip generation and impact assessment for the proposals;
- **Chapter 6: Construction** – sets out a high-level review of construction-related trips and safety measures for the construction phase(s); and
- **Chapter 7: Conclusion** – provides a summary table in accordance with TfL guidance.

As requested by TfL, the following supplementary reports are contained in the appendices:

- Appendix C – Outline Construction Logistics Plan (CLP)
- Appendix D – Outline Delivery and Servicing Plan (DSP)
- Appendix E – Stage 1 Road Safety Audit

- Appendix F – Healthy Street Designers’ Check
- Appendix G – Pedestrian Comfort Level Assessment

2. Transport planning for people

In line with the Healthy Streets TA guidance, this chapter sets out details of who this development will be for, how they will travel to and from it, and their purpose for travel.

2.1 Approach

A user-centric approach has been taken to the redevelopment proposals which respond to the needs of future residents, employees, and visitors to the site. The redevelopment proposals will improve access and the layout of the site, which will benefit all site users. New access corridors between the building blocks will improve the permeability and connectivity of the site to the local area and surrounding transport networks. The scheme will create active frontages along Harrow Road and Edgware Road which are currently car dominated with barriers restricting permeability.

The creation of a central high quality public realm space will enhance the liveability of the area. This will make the scheme an attractive place for people to stop and rest, feel relaxed, and feel safe, which are some of the Healthy Streets indicators.

The car-free nature of the development will create a pleasant environment for people, as well as promote the use of public transport as an alternative to travel by private car. The car-free nature also reduces highway impact on the surrounding streets.

Cycle parking is proposed with reference to the *London Plan* (2021) standards and *London Cycle Design Standards* (LCDS) guidance. The needs of cycle users will be met through the provision of Sheffield stands for all short-stay cycle parking. A proportion of long-stay cycle parking will also be Sheffield stands to allow the use of larger or adapted cycles.

2.2 Proposed development users and requirements

Table 1 provides the user type assumptions and requirements by land use for the PGPS development.

Table 1: PGPS users and requirements

Land Use	User Type Assumptions	Requirements of User Types
Residential	<p>The primary land use will be residential, which will be provided as a mix of affordable and private units as well as wheelchair accessible units. These will be provided in units ranging in size from studio to four beds. A range of future residents are therefore likely to live in the proposed development, including families, couples, and single occupants. Future residents are likely to include people of all ages from children to the elderly, people of all physical abilities from active individuals to those with mobility impairments and people of various economic statuses.</p> <p>It is likely that the greatest residents travel demand will be during the weekday AM peak for commuting, education, and education-escort trips. These residents are then likely to arrive back at the site over a protracted weekday PM peak period, which accounts for differences in work and education schedules, as well as additional leisure activities that may take place after work. During the weekends, residents are considered likely to depart from and arrive at the site throughout the day for leisure and shopping activities.</p> <p>Given the car-free nature of the development and the excellent public transport connections, almost all trips are expected to be undertaken by walking, cycling or public transport (circa 95% – detailed in subsequent chapters).</p>	<p>Given the range of residential units that will be provided, there will be a wide range of residents including those with mobility impairments and children.</p> <p>Where possible routes to and from the residential buildings should therefore cater for this range of requirements, including objectives of being easy to cross, accessible to all, quiet, and feeling safe and relaxed.</p> <p>Primary links within the site to public transport interchanges should be provided with pleasant and attractive routes, in order to promote walking, cycling and public transport use. This includes providing places to stop and attractive features to look at.</p> <p>Routes should seamlessly integrate residential buildings with other facilities and land-uses on-site, as well as providing connectivity to the wider local area and surrounding transport networks.</p>

Land Use	User Type Assumptions	Requirements of User Types
Flexible Commercial	<p>The flexible commercial units are intended to meet the needs of residents and visitors associated with PGPS, WEG and the local area. These retail related units will have a local catchment and are not envisaged to be retail destinations in their own right.</p> <p>As such visitor trips will form part of pass-by / linked trips (e.g. trips by residents and employees on site and in the local area), likely to be undertaken by sustainable modes of transport including walking, cycling and public transport.</p> <p>Trips associated with employees may comprise of a mix of those made outside the AM and PM peak hours / prior to opening and post-closing times, with possibly a proportion occurring during peak hours.</p>	<p>Given that visitor trips are likely to be linked or pass-by trips, the flexible commercial units should be located in a prominent, attractive, and easy to access location.</p> <p>Walking and cycling are likely to be the most popular and convenient methods of travel to the units by visitors, employees and residents of the site and surrounding area. On-site high quality walking and cycling infrastructure should therefore support ease of navigation and access to the facilities. The units should ideally also be easily accessible from public transport services.</p>
Community	<p>The community space is expected to be for residents (and local users) and therefore would attract mostly walking / cycling trips. It is not expected to attract external trips to the local networks.</p>	<p>Like commercial uses, convenient and direct routes should be provided for the uses of the community space.</p> <p>Routes should prioritise walking and cycling over other modes and provide adequate accessibility for a full range of user mobility requirements. Short stay cycle parking should be provided close to the community space.</p>

3. Site and surroundings

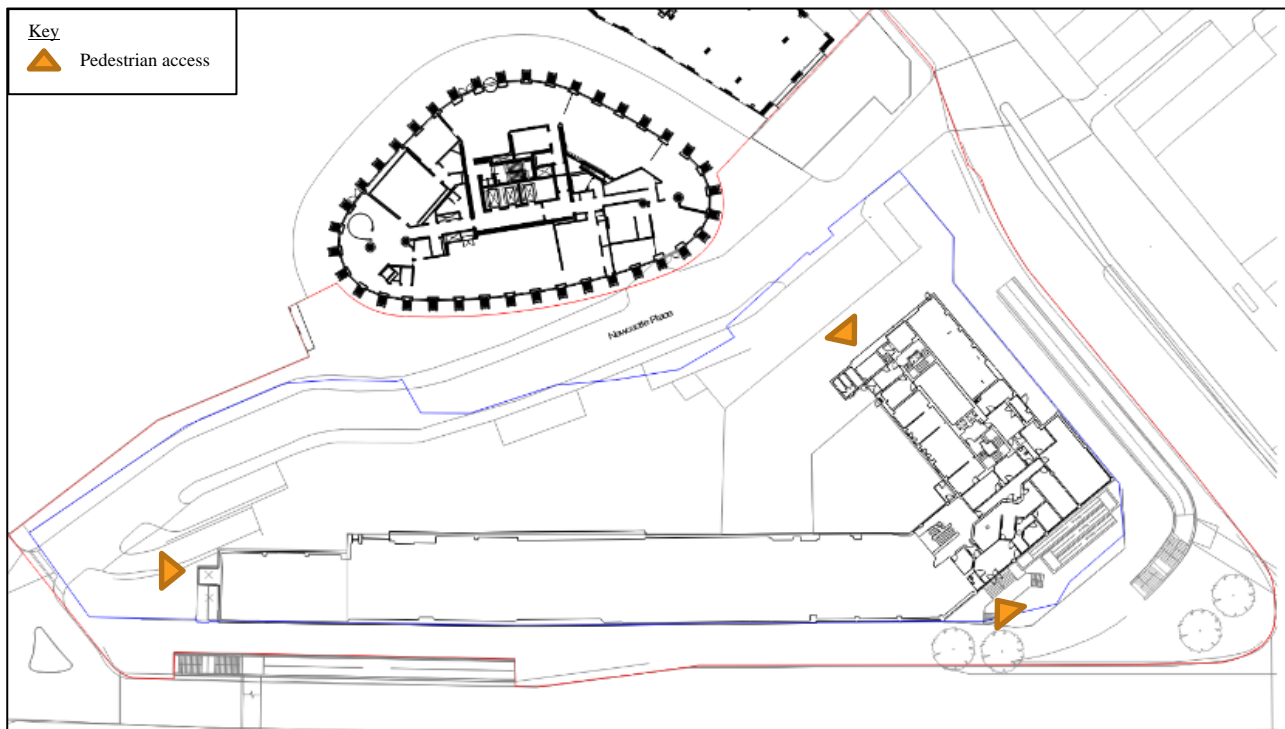
This chapter sets out details of how people of all abilities, currently and in the future, will move around the new PGPS development and its immediate surroundings.

3.1 Walking

3.1.1 Existing pedestrian access

The main pedestrian access to the former police station is from the corner of Harrow Road / Edgware Road (stepped and ramp access). Additional access points are available from Newcastle Place and Paddington Green. This is shown in Figure 5.

Figure 5: Existing pedestrian access points



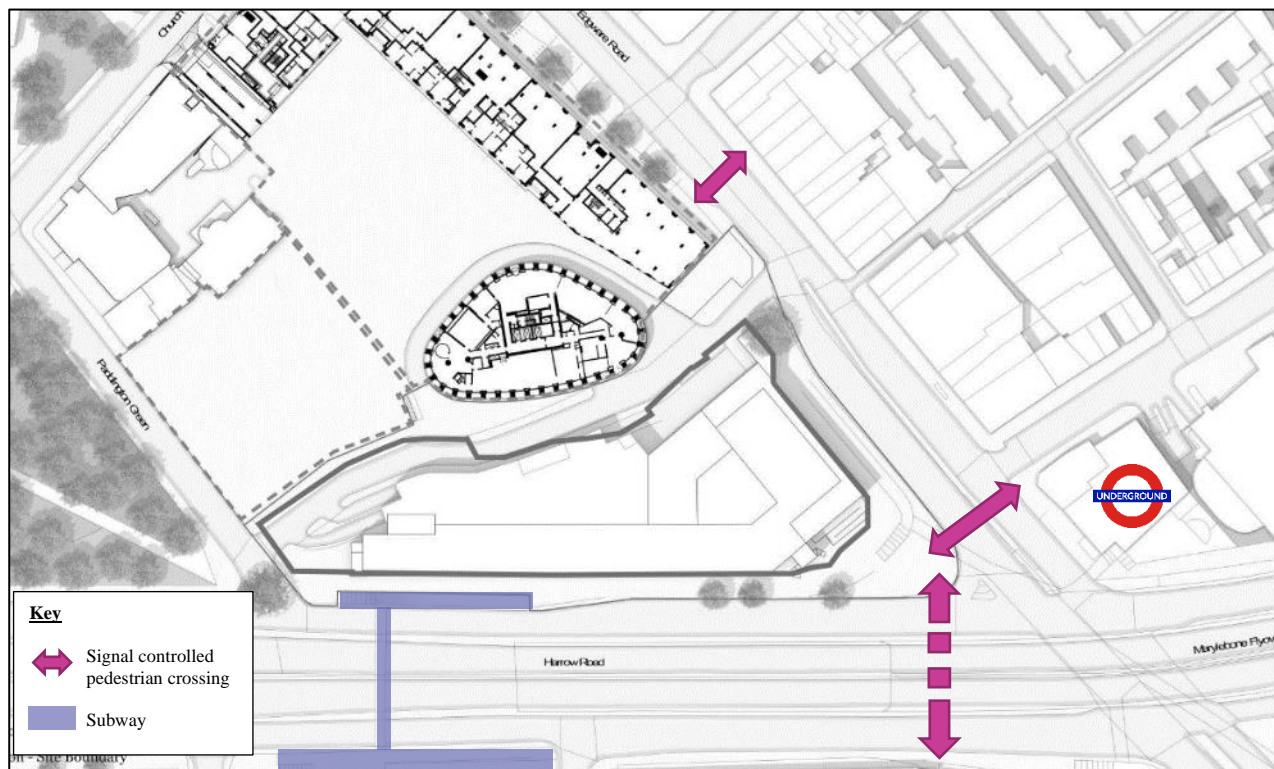
Footways are provided along all the local roads, and bollards are present along the footway of Newcastle Place. Newcastle Place currently has footways on the southern side, which are approximately 1.8m wide.

Dropped kerbs are provided at the majority of pedestrian crossing points. There are signal-controlled pedestrian crossings at the Edgware Road / Harrow Road junction. Further signal-controlled crossings are available along Edgware Road.

The steps and ramp to the subway on the corner of Edgware Road / Harrow Road are closed as part of the TfL Safer Junction scheme to create a better pedestrian environment (see Section 3.4.2.1). The existence of this subway presents a barrier to permeability for pedestrians.

A further subway with steps and ramp access is provided on Harrow Road to the southwest of the site. The location of signal-controlled crossing points and Harrow Road subway is shown in Figure 6.

Figure 6: Existing pedestrian crossing facilities

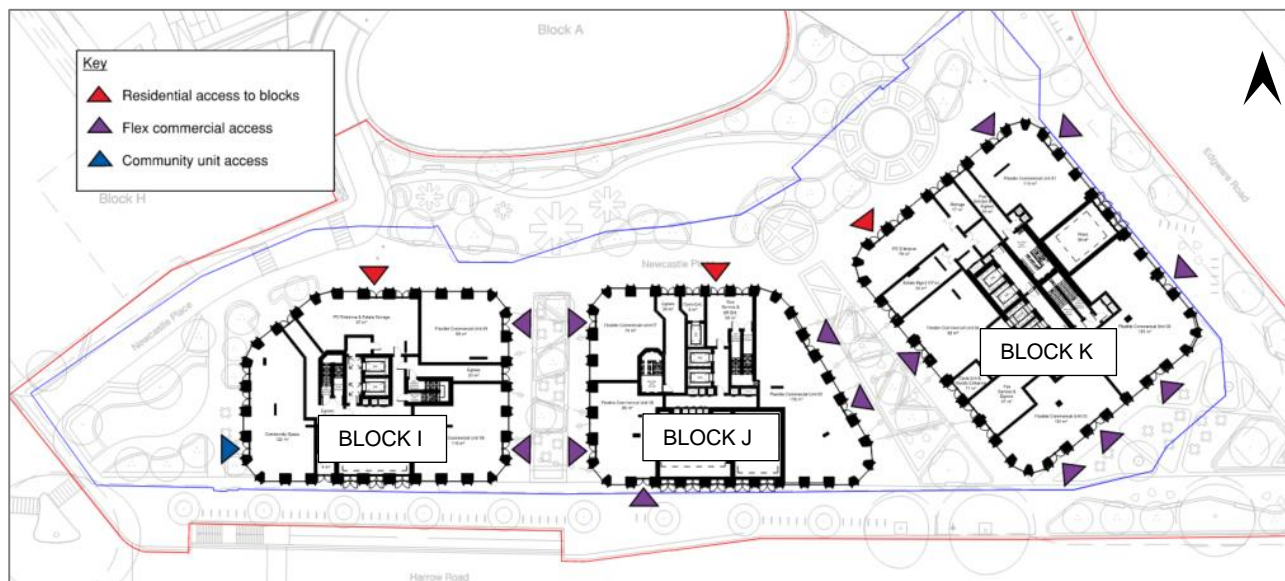


3.1.2 Proposed pedestrian access

The residential buildings entrances are proposed to be fronting onto the pedestrianised area on Newcastle Place. Building entrances to the flexible commercial space will be from Newcastle Place, Harrow Road and Edgware Road. The proposal will activate the frontages along Harrow Road and Edgware Road and provide an improved pedestrian environment. The building entrances are shown in Figure 7.

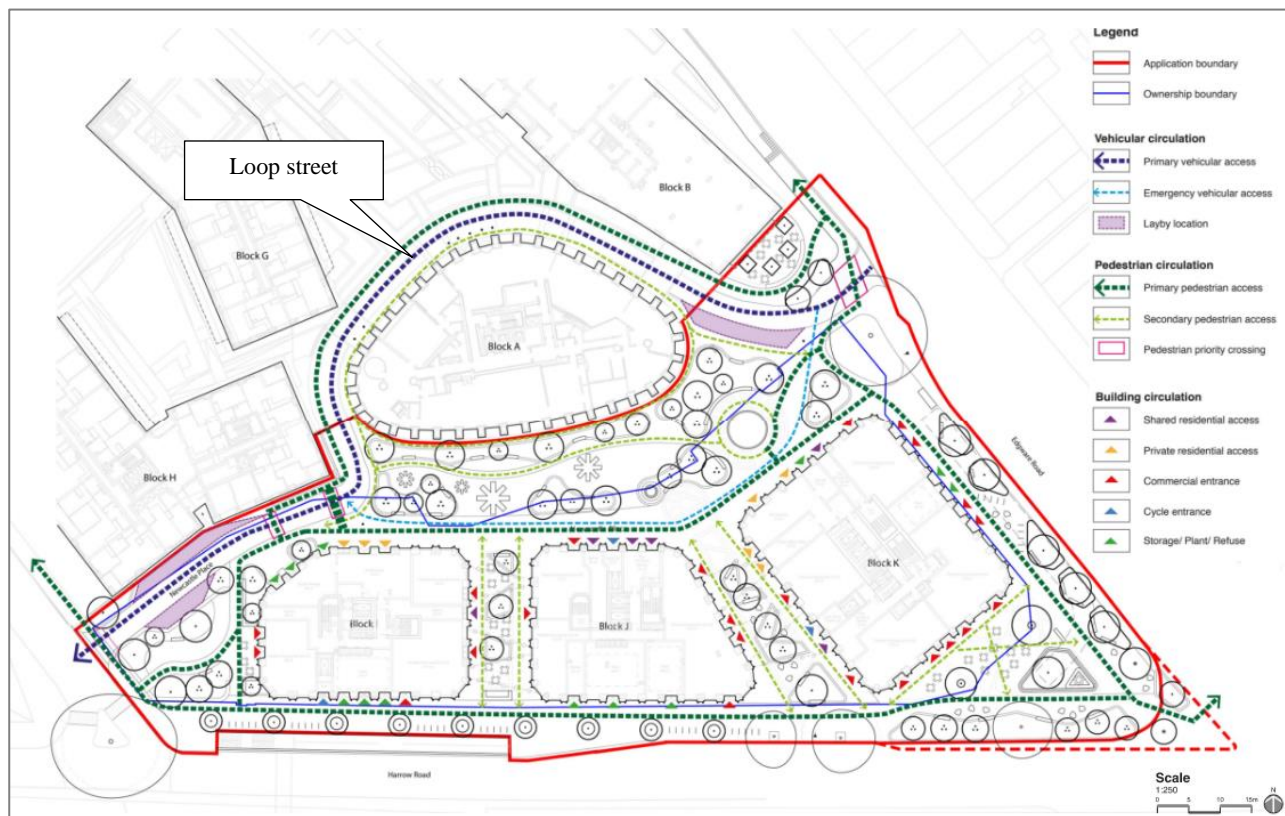
Newcastle Place is proposed to be partially closed off for general vehicular access (see subsequent sections for details) to deliver a high quality, privately maintained pedestrian priority public realm space. The public realm will be integrated with Newcastle Place and treated as one pedestrianised zone that emphasises pedestrian priority to interact with other blocks and facilities across the development site (including WEG).

Figure 7: Pedestrian building entrances



The pedestrian access and circulation plan is shown in Figure 8.

Figure 8: Proposed vehicular accesses and circulation



An assessment on Pedestrian Comfort Level (PCL) as requested by TfL is contained in Section 5.5.

3.1.2.1 Off-site pedestrian infrastructure improvements

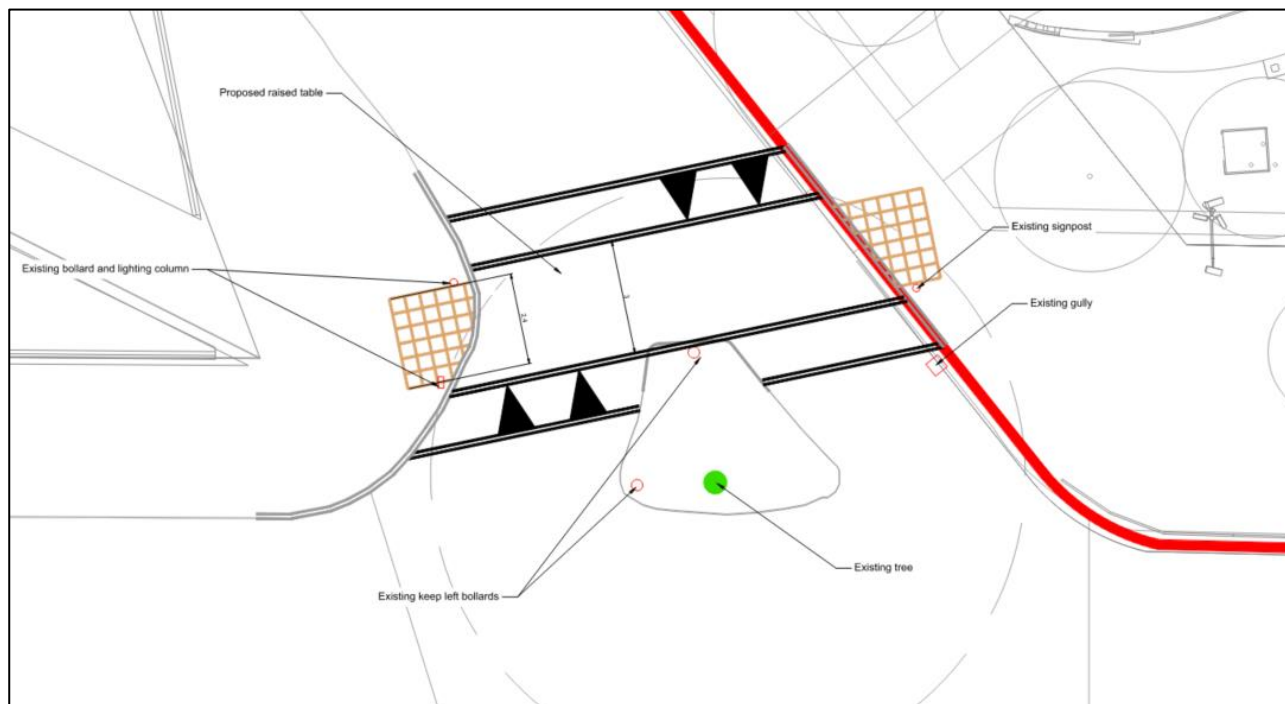
Following consultation with WCC Highways, a pedestrian crossing is proposed to improve crossing facilities over Paddington Green at the junction with Harrow Road. Currently, no crossing exists, with pedestrians crossing informally potentially using the shelter of the central island to cross in two 'bites' if necessary. The existing arrangement is illustrated by the Figure 9.

Figure 9: Existing pedestrian crossing arrangement



The concept arrangement of the proposed crossing is illustrated by Figure 10(contained within Appendix B). Subject to detailed design, it is suggested that the crossing is raised for the benefit of pedestrians and to act as a traffic calming measure. WCC Highways has confirmed on 20 December 2022 that the concept is acceptable.

Figure 10: Proposed pedestrian crossing at Harrow Road / Paddington Green junction



3.2 Cycling

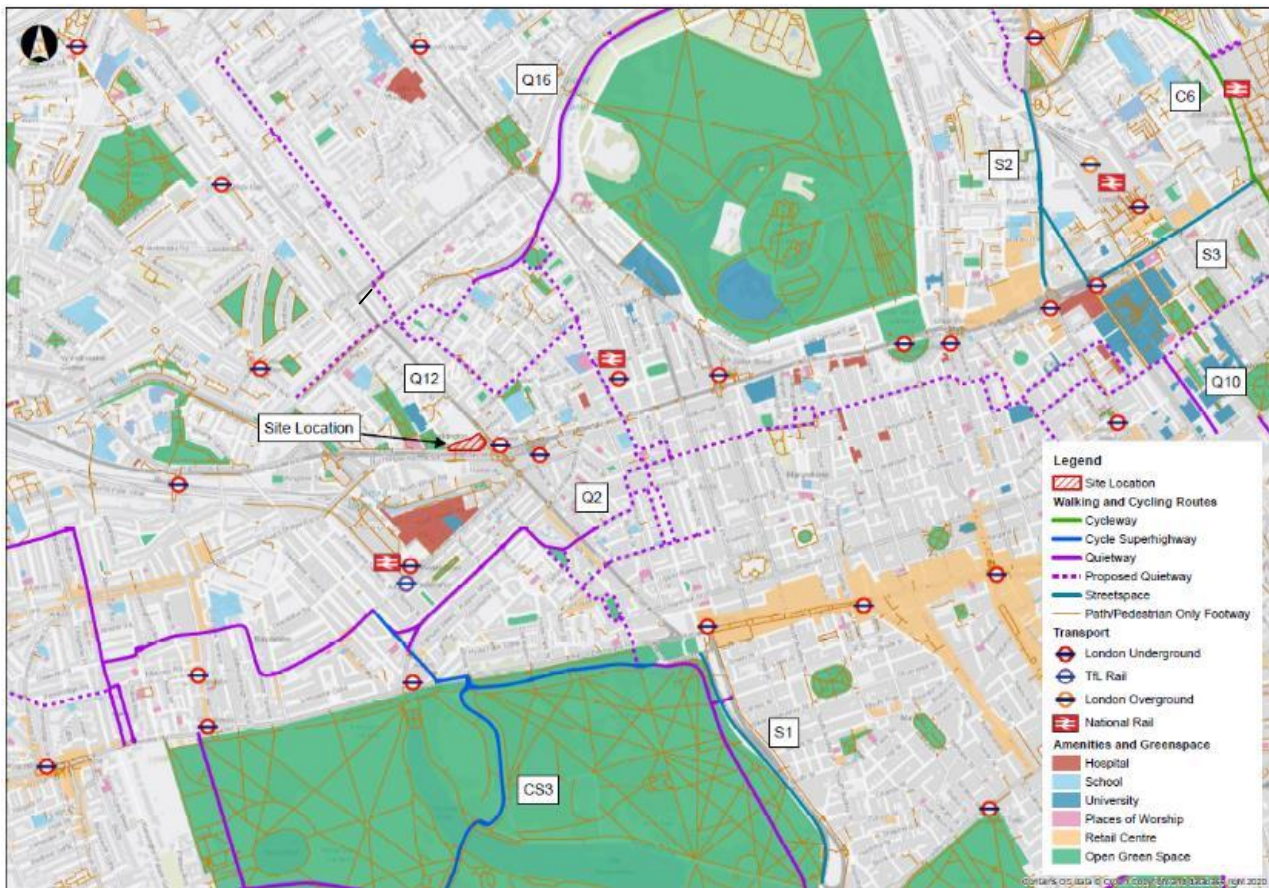
3.2.1 Existing cycling access and facilities

3.2.1.1 Cycle routes

The following cycle routes are located in the vicinity of the site:

- Quietway 2 (~650m from site) – Harrowby Street to Bayswater
- Quietway 16 (~1.2km from site) – Lisson Grove to Regent's Park
- Cycleway 3 (~1.4km from site) – an east-west cycleway between Barking and Lancaster Gate

Figure 11: Cycle routes in relation to the site



3.2.1.2 Cycle parking

There are a number of existing cycle parking facilities in the vicinity of the site, which include:

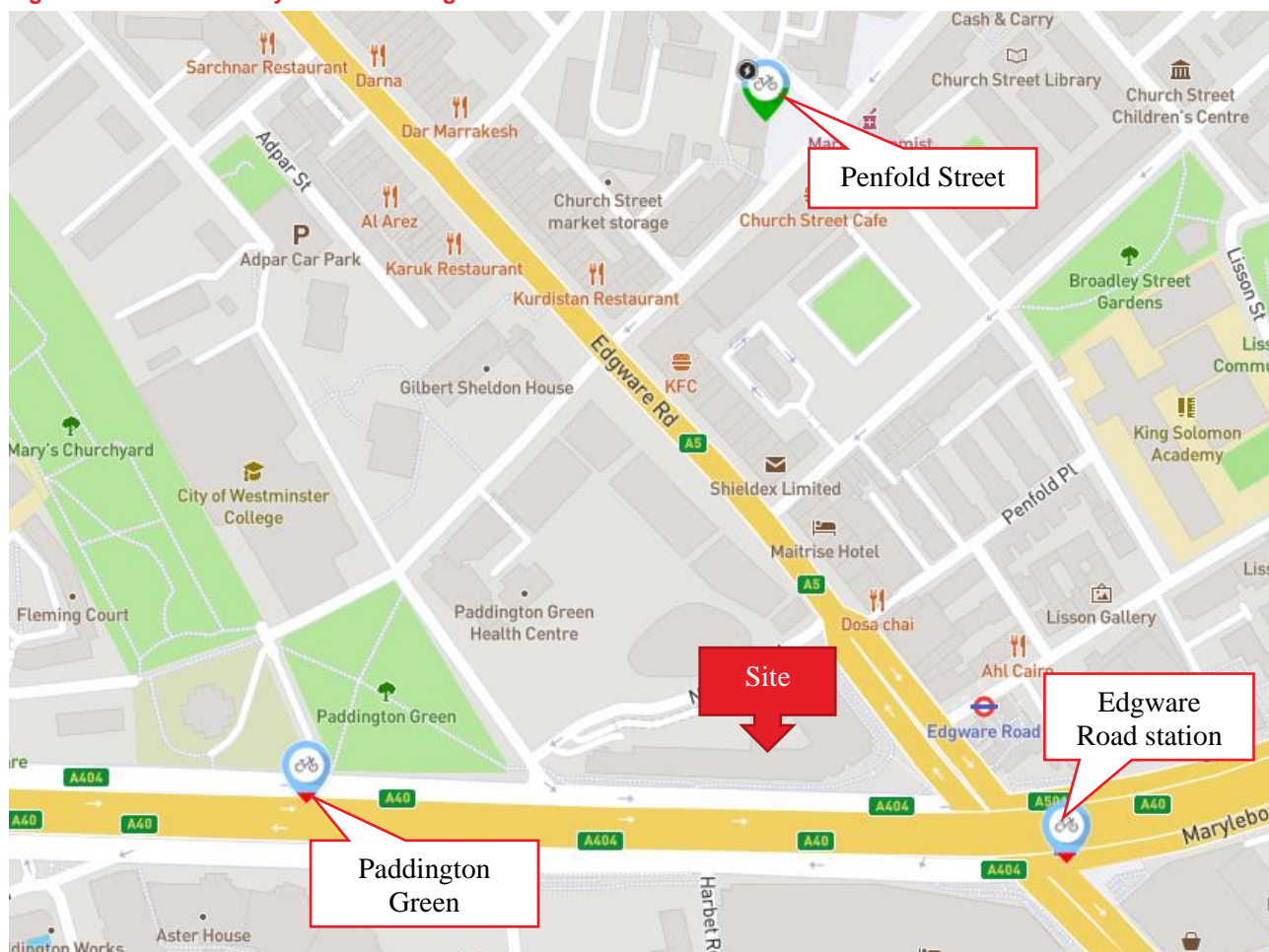
- By Paddington Green Police Station – 6 spaces
- Harrow Road / Edgware Road junction – 14 spaces
- Edgware Road station – 8 spaces
- Under the Marylebone flyover – 30 spaces to the west of the junction and 20 spaces to the east of the junction with Edgware Road.
- Broadley Street – 8 spaces
- Edgware Road (adjacent to Edgware Road post office) – 2 spaces

3.2.1.3 Cycle hire

The nearest cycle hire docking stations are as follows and shown in Figure 12:

- Paddington Green – 20 docks
- Edgware Road Station (under the Marylebone Flyover east of Edgware Road) – 64 docks.
- Penfold Street – 15 docks, including one e-bike.

Figure 12: Locations of cycle hire docking stations



(Source: <https://santandercycles.tfl.gov.uk/map>)

TfL provided the capacity and utilisation of some of the cycle hire stations in the vicinity of the site. The analysis of the data is presented in Chapter 5.

3.2.2 Proposed cycling access and facilities

3.2.2.1 Cycle parking

Cycle parking provision has been considered against the standards contained in the London Plan (Table 10.3 of the London Plan). The standards which will be relevant to this scheme are presented in Table 2.

Table 2: London Plan (2021) minimum cycle parking requirements

Land Use	Long-Stay Provision	Short-Stay Provision
Residential (C3)	1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per 2 person 1 bedroom dwelling 2 spaces per all other dwelling	5 to 40 dwellings: 2 spaces 1 space per 40 dwellings
Retail (A1)	Food Retail: From a threshold of 100sqm: 1 space per 175sqm GEA	Food Retail: From a threshold of 100sqm: areas with higher cycle parking standards: first 750sqm: 1 space per 20sqm; thereafter: 1 space per 150sqm

Land Use	Long-Stay Provision	Short-Stay Provision
	Non-Food Retail: From a threshold of 100sqm: first 1000sqm: 1 space per 250sqm; thereafter: 1 space per 1000sqm (GEA)	Non-Food Retail: From a threshold of 100sqm: areas with higher cycle parking standards: first 1000sqm: 1 space per 60sqm; thereafter: 1 space per 500sqm (GEA)
F&B (A2-A5)	From a threshold of 100sqm: 1 space per 175sqm (GEA)	From a threshold of 100sqm: areas with higher cycle parking standards: 1 space per 20sqm (GEA)
Community (D2)	1 space per 8 FTE staff	1 space per 100 sqm (GEA)

TfL's position on Class E uses is that they will seek to apply the most stringent parking standards, i.e. those which result in the most cycle parking and the least car parking. On this basis, all flexible commercial land-uses are considered to be A2-5 retail for a robust case.

The proposed long stay and short stay cycle parking provision is presented in Table 3.

Table 3: Proposed cycle parking spaces at PGPS

Land Use	Long Stay	Short Stay
Residential	1,004	15
Flexible commercial	7	61
Community	1	2
Total	1,012	78

The proposed cycle parking strategy is as follows and the access to the cycle parking is covered in Section 3.2.2.2:

- **Short stay cycle parking** – 81 new cycle parking spaces in the form of Sheffield stands will be provided in the surrounding public realm. They will be conveniently located and visible to cyclists. The proposal incorporates the new cycle stands, together with relocated existing stands, as part of the proposed landscaping proposals along Edgware Road and Harrow Road. This is shown in Figure 13.
- **Flexible commercial long stay cycle parking spaces** – These will be part of the fit out of each ground floor unit.
- **Residential long stay cycle parking spaces** – These will be provided in the B1 basement. It is proposed that 886 spaces will be provided in the PGPS basement, and an additional 118 spaces will be provided in the WEG basement to provide a total of 1,004 spaces to meet London Plan (2021) standards. The long stay cycle parking areas is illustrated in Figure 14.
- The long stay cycle parking will be in the form of two-tier racks, 11% will be provided for more accessible spaces in Sheffield stands, and an additional 5% provided for oversized cycles in Sheffield stands. All the residential Sheffield stands will be located in the PGPS B1 basement.

Figure 13: Locations of short stay cycle parking

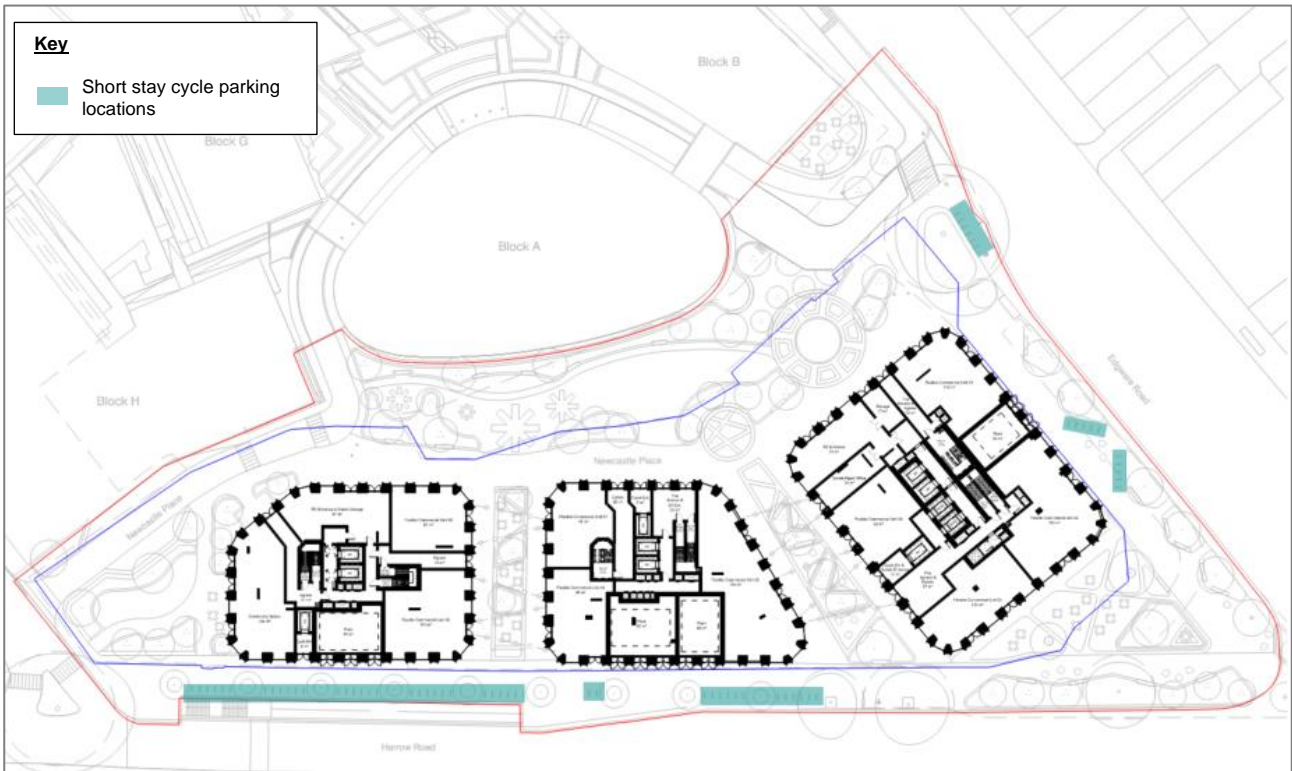


Figure 14: B1 long stay cycle parking layout and access

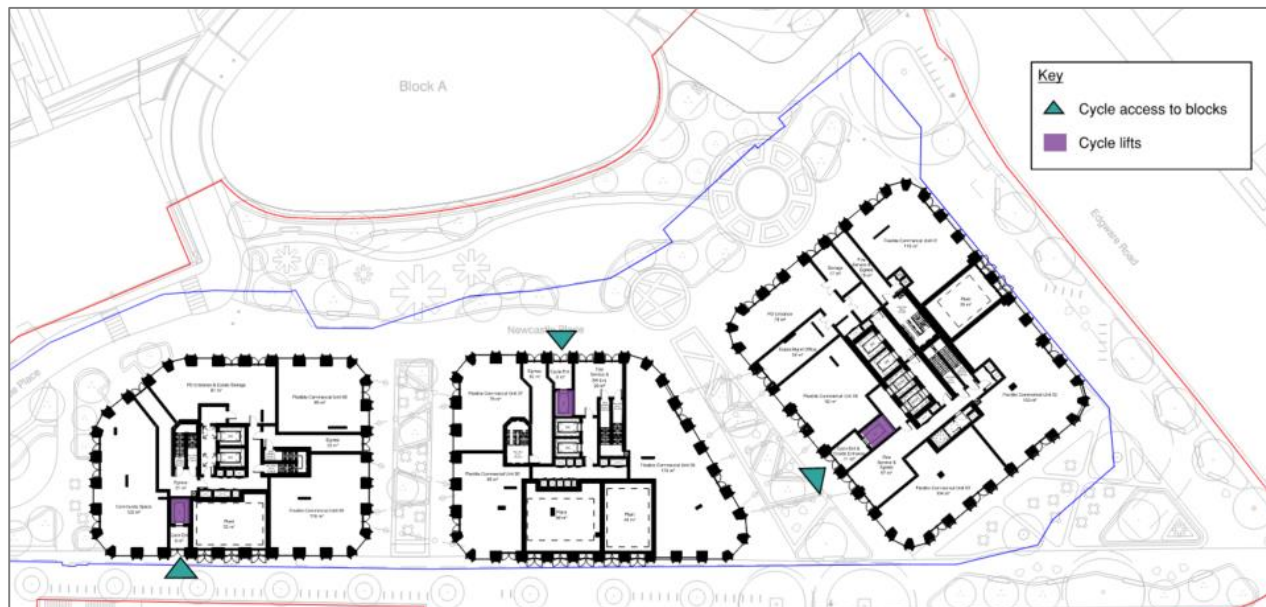


3.2.2.2 Cycle Routes and Access

There will be public realm improvements to Newcastle Place which will improve cyclist connections to the wider cycle network. Step-free access to the B1 basement will be from Newcastle Place and Harrow Road to provide access to the residential long stay cycle parking. The access points and the cycle lifts are shown in Figure 15.

The cycle lifts in Block I to K share between cyclists and refuse bin movements only. Based on the cyclist demand of 2 inbound and 8 outbound trips in the AM peak hour (see Section 5.6.1), the lifts would accommodate circa 3 cyclists per hour in the peak demand. Three cycles can be sufficiently accommodated within the cyclist entrances.

Figure 15: Cyclist access and cycle lifts



3.3 Public transport

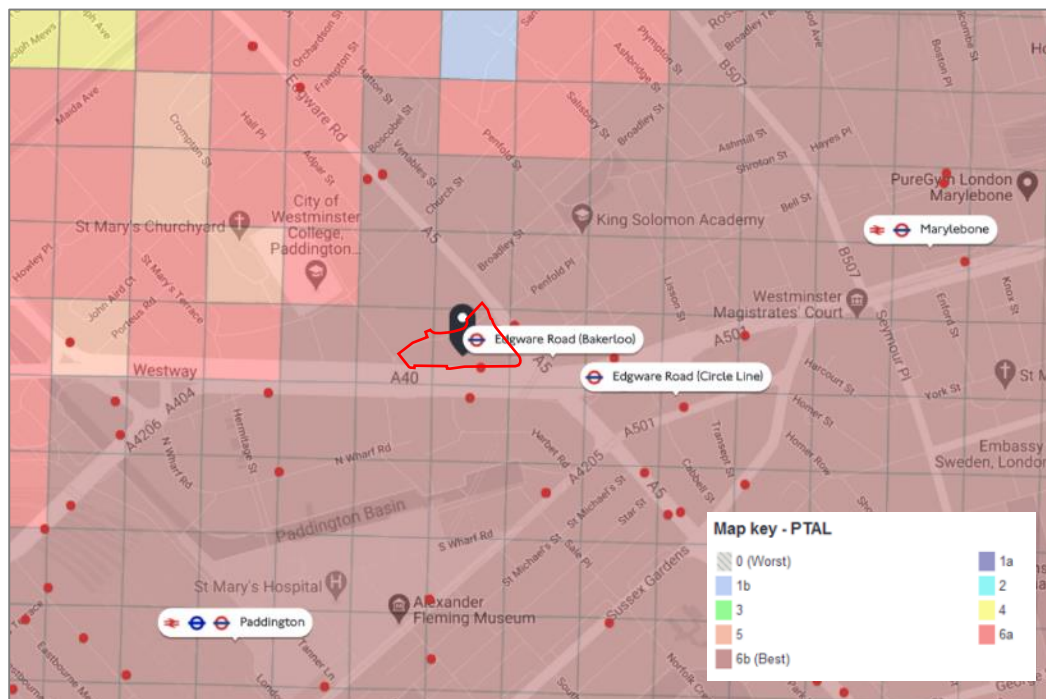
3.3.1 Public transport accessibility

The Public Transport Accessibility Level (PTAL) methodology considers the time taken to access the public transport network including:

- The walk time to various public transport services;
- The average waiting time for each service; and
- The reliability of each service.
- The assessment is based on a walk speed of 4.8kph and considers rail stations within a 12-minute walk (960m) of a site and bus stops within an eight-minute walk (640m) of a site. The PTAL assessment is undertaken using the operating patterns of existing public transport services during the morning peak hour.

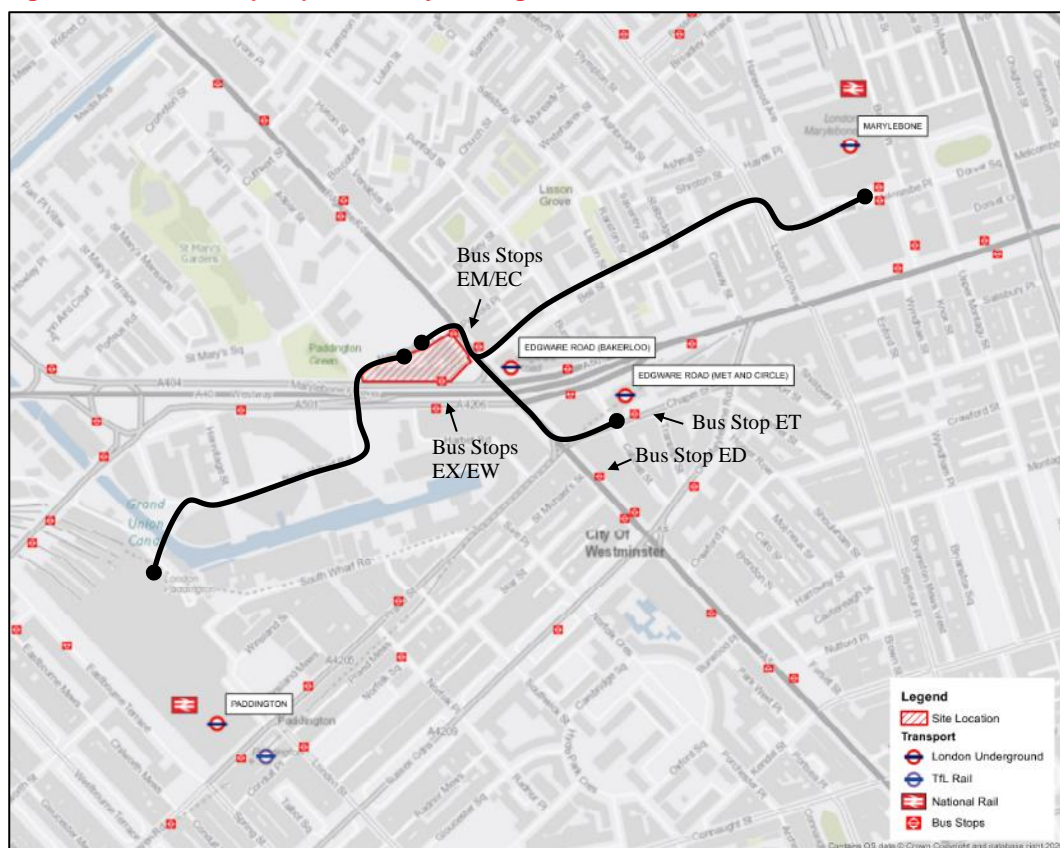
Based on TfL's WebCAT online database, the development site has a PTAL rating of 6b, which indicates an 'excellent' connectivity to the surrounding network, and is the highest possible score on the PTAL scale. The existing PTAL is shown in Figure 16.

Figure 16: Public transport accessibility calculated by WebCAT



The plan shown in Figure 17 shows the nearest bus stops and walking route to stations.

Figure 17: Public transport plan and key walking routes to stations



3.3.2 London Buses

The nearest bus stops to the site are Stops EM / EC on Edgware Road and Stop EX on A404 Harrow Road. Additional bus stops are within walking distance (400m) of the site and Table 4 shows the bus routes and frequencies.

Table 4: Bus services and peak hour frequencies

Bus Stop	Location	Route	Distance (metres)	Peak hour frequency (bph)
EM/EC	Edgware Road	16	80	9
		332	80	6
		98	80	9
		414	80	8
		6	80	10
EX/EW	Harrow Road	18	130	7
ED	Edgware Road / Praed Street	7	340	8
		23	340	8
		36	340	10
ET	Chapel Street	27	380	8
		205	380	8

3.3.3 London Underground

The Edgware Road Underground stations are located 60m (Bakerloo Line), and 300m (Hammersmith & City, Circle and District Lines) to the east and southeast of the site. The services and frequencies are summarised in Table 5.

Table 5: London Underground services at Edgware Road stations

LUL	Direction	AM peak frequency	PM peak frequency	Sat peak frequency
Bakerloo Line	Towards Queens Park	21	21	20
	Towards Elephant and Castle	23	21	20
Hammersmith & City and Circle Line	Towards Barking	13	13	12
	Towards Hammersmith	12	12	12
District and Circle Line	Via Victoria	6	6	6
	Towards Wimbledon	6	6	6

3.3.4 Elizabeth Line

The Elizabeth Line went into passenger service in August 2022. The Elizabeth Line will serve Paddington Station. The nearest station entrance from the site is via Paddington Basin, located approximately 650m from the site. The station is step-free between the platforms and street level; and provides an interchange between the London Underground and the National Rail services.

Elizabeth Line provides connection from Paddington to Heathrow and Reading to the west and Abbey Wood to the east. Services operate at approximately 19 trains per peak hour per direction. According to the latest update from TfL, up to 24 trains per hour would run at peak times between Paddington and Whitechapel.

3.3.5 National Rail

London Paddington railway station, with the nearest entrance point 650m from the site, provides services operated by Great Western Railway, Heathrow Express and TfL Rail, to destinations including Reading, Cheltenham Spa, Swansea, Bristol, and Heathrow Airport.

London Marylebone railway station is located approximately 800m to the east of the site. The station provides services operated by Chiltern Railways to destinations including Aylesbury, Oxford, Birmingham, and Stratford Upon Avon.

3.4 Highway network

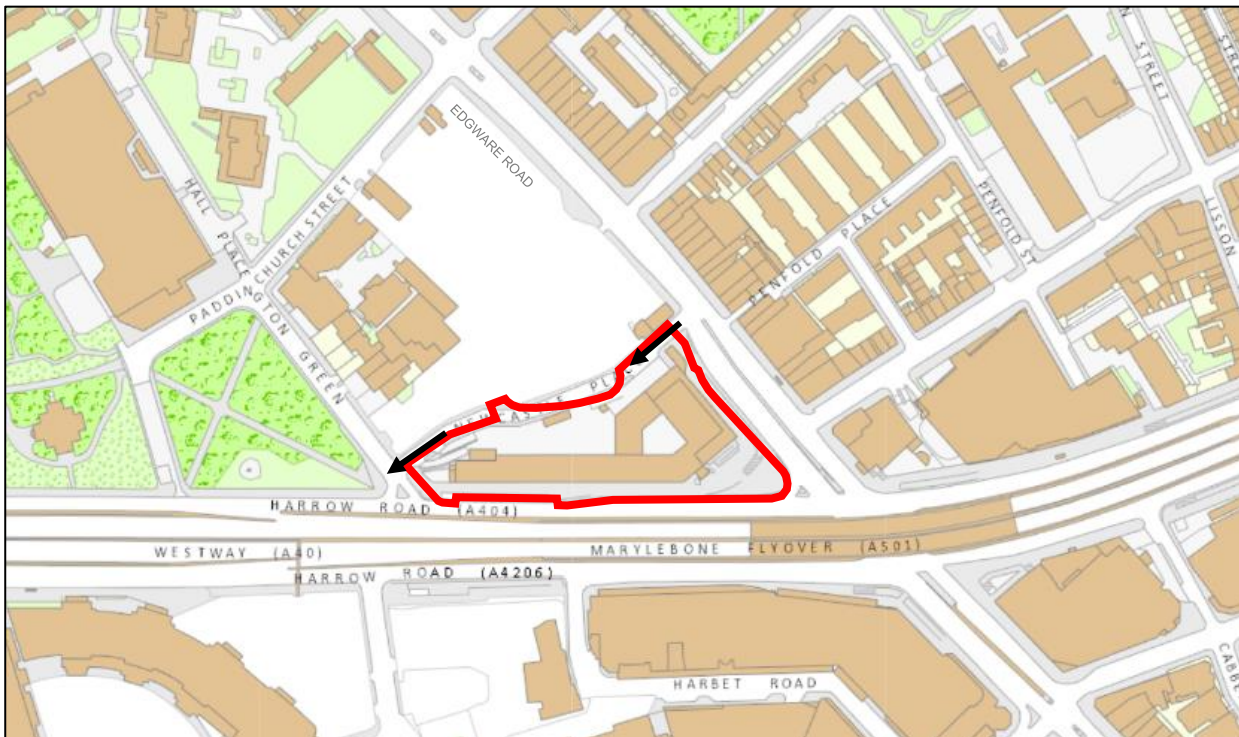
Newcastle Place is one-way westbound between Edgware Road and Paddington Green. Paddington Green is two-way, connecting with Harrow Road to the south at a priority junction. Edgware Road meets Harrow Road at a signal-controlled junction to the southeast of the site.

Both the Edgware Road (A5) and the eastern section of Harrow Road (A404) are part of the Transport for London Road Network (TLRN). Edgware Road forms a strategic northwest-southeast route and Harrow Road provides access to the A40 Westway and A501 Marylebone Road, a strategic east-west route.

3.4.1 Existing Vehicular Access

The former police station has car parking at basement and podium levels and a ramped vehicular access is provided from Newcastle Place (as shown in Figure 18).

Figure 18: Highway network and PGPS access points

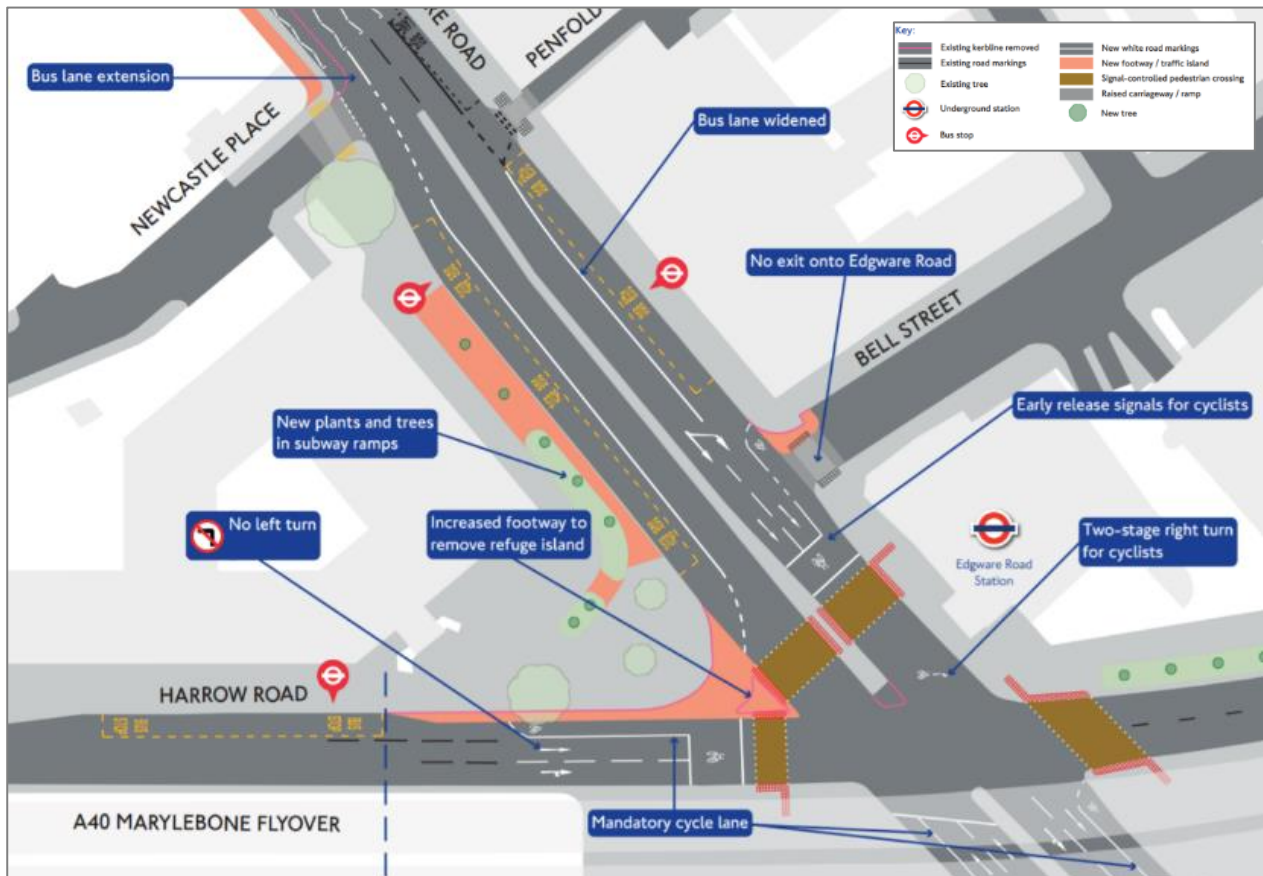


3.4.2 Committed Highway Works

3.4.2.1 TfL Safer Junctions Scheme

TfL completed the Safer Junctions scheme at the Edgware Road and Harrow Road junction in 2021. The scheme aims to reduce road danger and eliminate collisions at the junction, and create safer streets for users to walk, cycle and use public transport. The proposal consists of widening of all pedestrian crossings at the junction, introducing a 20mph speed limit across the junction. An extract of the scheme showing Edgware Road and Harrow Road is shown in Figure 19.

Figure 19: Extract from the Safer Junction scheme design proposals (now complete)



The scheme involved the following (all works have been completed except for first bullet):

- Fill in the ramp and stairs of the subway entrances to create sustainable drainage features. This creates a better pedestrian environment and improves the public realm space around the site. The forthcoming rain garden will fill in three of the four entrances.
- Installing cyclists early start signal on southbound Edgware Road.
- Building out northwest corner to remove junction splitter island to provide a better pedestrian environment.
- Converting staggered crossing to straight-across crossing to create direct and safer routes to/from Edgware Road Bakerloo line station.
- Changing the current three-lane road layout to two traffic lane and a cycle land through the junction.
- Widening southbound bus lane to 4.5m as it passes the bus stop.
- Extending bus lane north of Newcastle Place.
- Banning left turn from Harrow Road into Edgware Road northbound.
- Making Bell Street no exit onto Edgware Road.

3.5 Proposed vehicular access

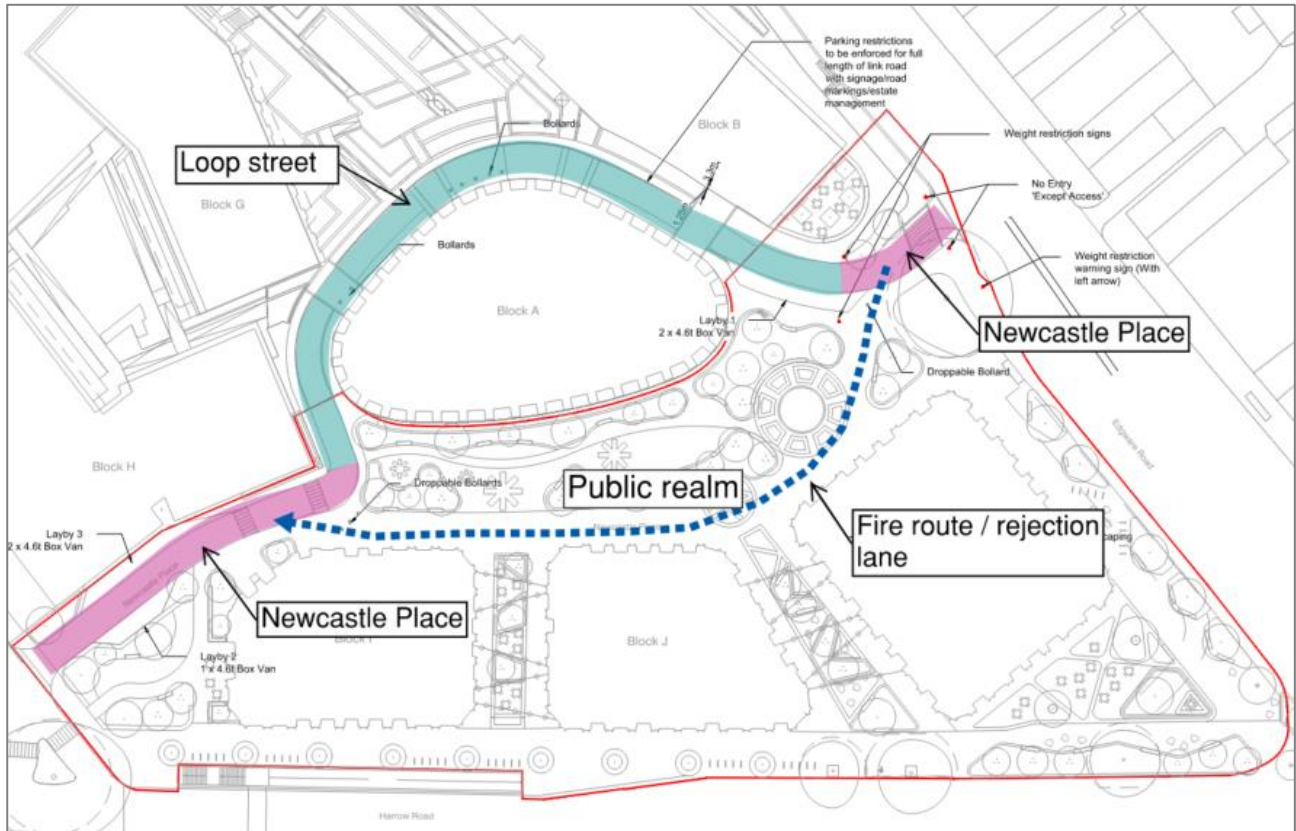
The vehicular access and circulation plan is shown in Figure 8. There are two proposed vehicular accesses to the site. They include:

- Basement access: Church Street provides access to the basement car park which was consented as part of the WEG development. This will be used for PGPS residential parking and also can be available for residential bulky goods deliveries to access WEG basement service yard (further delivery and servicing arrangements – see DSP in Appendix D).

- Ground level access: Newcastle Place / Edgware Road junction via loop street (short link connecting Newcastle Place (W) and Newcastle Place (E) that runs to the north of The Westmark) provides access for taxi or car drop-offs/pick-ups and residential deliveries. No parking is permitted along the loop street. These are demonstrated in Figure 20.

Emergency vehicles will access the site via the same junction (Newcastle Place / Edgware Road junction) and will use the landscaped route to gain closer access to Blocks I, J and K.

Figure 20: Ground level vehicular access via Edgware Road / Newcastle Place junction

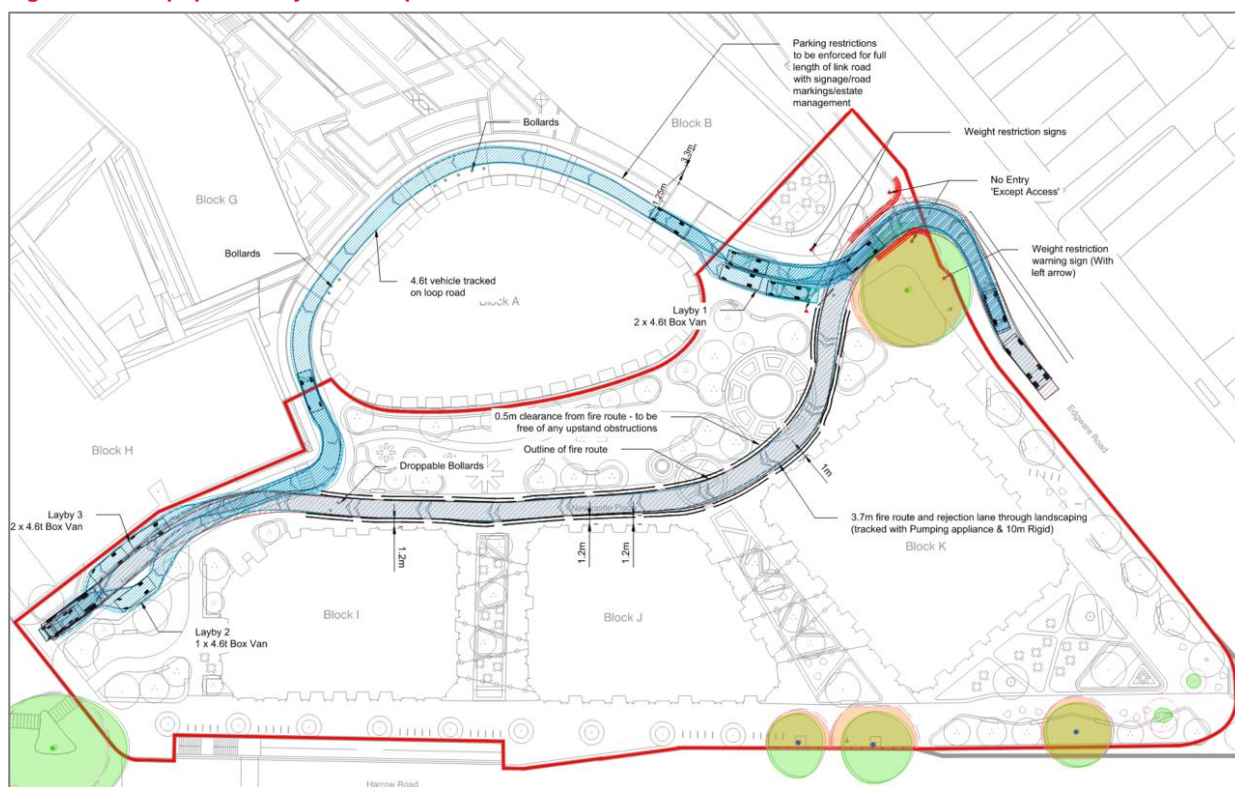


The overall vehicular strategy is as follows:

- Newcastle Place is proposed to be largely closed off for general public / development-generated vehicular access except for emergency vehicles and as a rejection lane for larger goods vehicles that have inadvertently accessed the site. Weight restriction signage will be provided south of and at the entrance of the Newcastle Place / Edgware Road junction.
- Vehicles entering the site to use the loop street (north of West End Gate), which operates on a one-way westbound arrangement, and exiting to Paddington Green via Newcastle Place.
- The loop street provides access to residential delivery vehicles, taxi /car drop offs and pick ups. No parking is allowed for the full length of the loop street; to be enforced by signage/ road markings and/or estate management.
- Three laybys are provided along the loop street and western end of Newcastle Place.
- Residential parking, bulky residential deliveries, commercial servicing, and refuse collection will use the Church Street entrance to enter the basement level of the site.

The landscape plan that shows the vehicular route is shown in Figure 27, and swept path analysis of the route is illustrated in Figure 21 (Drawing 277685-SK-057-A, also contained in Appendix B).

Figure 21: Swept path analysis – Loop street and Newcastle Place



3.5.1 Highway changes

3.5.1.1 Newcastle Place

- **Existing function** – Newcastle Place provides a one-way westbound connection between Edgware Road and Paddington Green and largely facilitated access to the former police station (i.e. the site). The police station closed in 2018. It serves as an alternative vehicle route to Church Street to properties on Paddington Green from the south and southeast. It has a local function and no wider vehicular route purpose. Historically it was created formally as part of the police station development. As such, it was intended primarily to serve the site and needs of the police, and not an integral part of the wider highways network.
- **Consented function** – Newcastle Place has a consented vehicle access to the WEG development around The Westmark. An on-street loading bay has been consented on Newcastle Place, located near a parcel store in The Westmark and is proposed for residential deliveries.
- **Proposed design** – The new design of Newcastle Place maximises the provision of landscaping adjacent the building blocks and incorporates a play area (south of The Westmark). The design principles of the Newcastle Place have been consulted and agreed with GLA and TfL in the pre-application stage.

There will be uncontrolled access for vehicles less than 7.5T around the northern side of The Westmark, along the existing one-way loop street (westbound).

Newcastle Place will be treated as a pedestrianised zone, with emergency / rejection vehicle access permitted along its length. It has a minimum width of 4.3m in front of Blocks I to K. This is to accommodate the minimum width required for a straight section for fire tenders (3.1m) and 1.0m to 1.2m for pedestrians. The improved Newcastle Place will provide walking and cycling-prioritised access for the public (subject to a walkways agreement within S106 or equivalent), WEG and the proposed development.

The Newcastle Place / Edgware Road access junction has been designed taking into account the mature tree on Edgware Road and its roots protection area. The swept path analysis is illustrated in Figure 21.

Pick up/ drop offs

Taxi / car drop off to each proposed block (Blocks I to J, as well as the Westmark block) will access the site via the Newcastle Place / Edgware Road junction and take place within the laybys to help those with mobility impairments. The overall demand for the laybys is expected to be low.

Bollard control

The April 21 application submission included bollard control to enforce Newcastle Place as a for access only street. Following a Stage 1 Safety Audit, TfL raised some concerns about the management of the bollards as should the strategy not be robust then they may be consequences for Edgware Road.

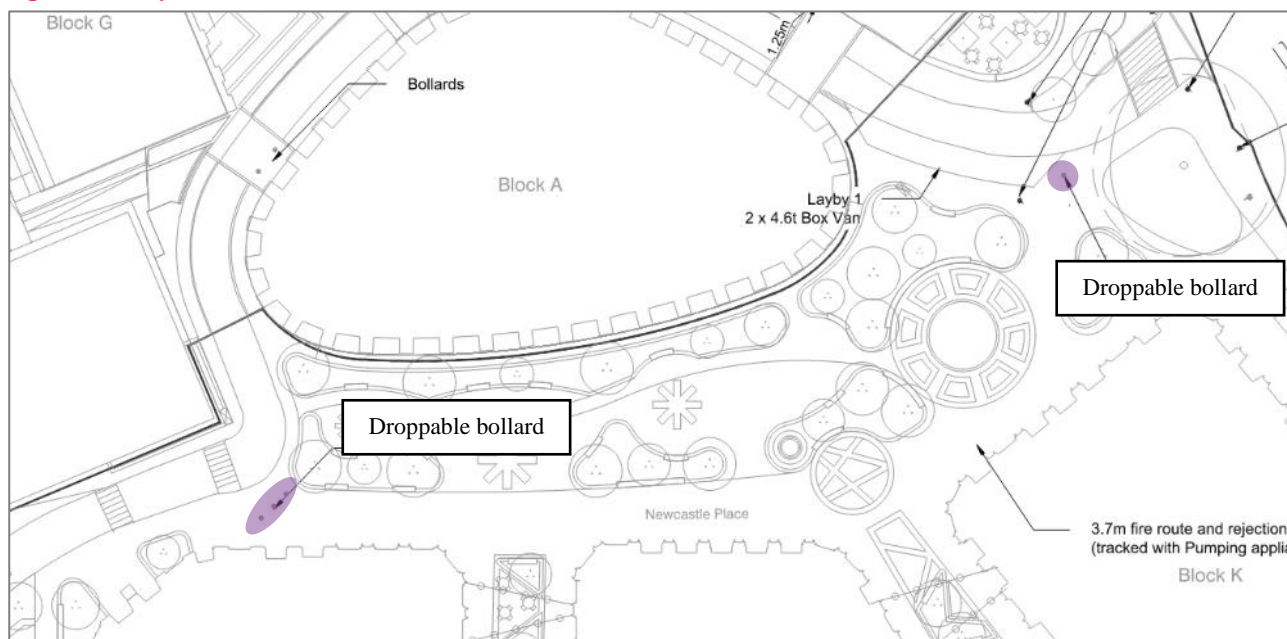
The revised landscape strategy, which pedestrianises the majority of the street and provides a through route around the northern side of The Westmark allows vehicles to access Newcastle Place unimpeded. This removes the issue of active bollard management and potential delays overspilling onto Edgware Road.

With the new design, bollard control is proposed on either side of the pedestrianised route as it meets the loop street on Newcastle Place. The indicative arrangement of the bollards is presented in Figure 21, detailed design of the positioning of the bollards will be reviewed in a later stage.

There will be uncontrolled access for vehicles up to 7.5T along the existing one-way loop street (westbound). Any larger goods vehicles that have inadvertently accessed Newcastle Place would be permitted through the controlled pedestrianised zone, which would otherwise be controlled by the bollard precluding access.

When required the bollard will be controlled (dropped) by the Estate Management Team (the bollards are expected to be operated through intercom connection to reception). Given the expected low number of vehicle trips, no more than one vehicle is expected to arrive at the same time and large / emergency vehicles are expected to be very occasional, if at all.

Figure 22: Proposed bollard control on Newcastle Place



3.5.2 Road Safety Audit

A Stage 1 Road Safety Audit (RSA) has been undertaken in October 2022 to assess the vehicular access and egress to the site, as well as the internal arrangements around the loop street. The RSA was undertaken in accordance with the Design Manual for Roads and Bridges (DMRB) GG 119 Road Safety Audit guidance that is suitable for a WCC road. The proposed scheme does not alter the Edgware Road / Newcastle Place junction design, and all changes along Newcastle Place occurs outside of the TfL red routes extent. No issues were identified in the RSA. The RSA report is presented in Appendix E.

3.6 Stopping up

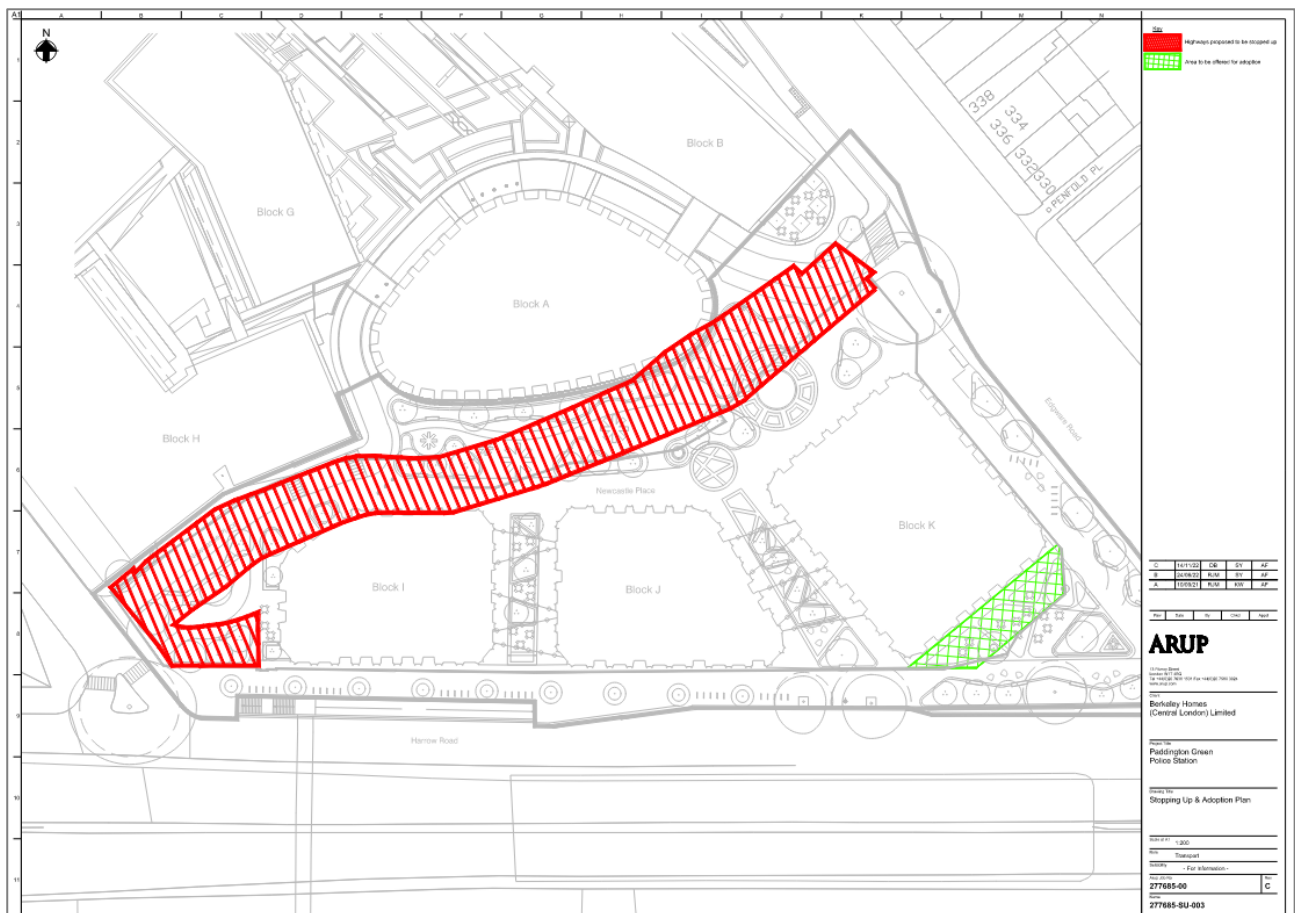
As discussed, the proposed development includes a proposal to ‘stop-up’ Newcastle Place which is currently part of WCC adopted public highway. The stopping up to extinguish public highway rights would be under S247 of the Town and Country Planning Act.

The purposes of stopping up Newcastle Place are summarised as follows:

- To allow Berkeley Homes to create a safer and greener space at the heart of the scheme, which will help deliver an environment with better air quality, an improved public realm with high quality finishes including water features and help towards maintaining a safer environment through our estate management.
- To deliver a pedestrianised public realm which prioritises pedestrian and cyclist movements and is in keeping with the Healthy Streets principles, and Policy T2 of the London Plan.

The proposed area to be stopped up is shown in Figure 23 (in red hatch) and a scaled drawing (Drawing 277685-SU-003-C) is included in Appendix B. In addition, the applicant would discuss the potential adoption of space within the scheme’s demise at the junction of Harrow Road / Edgware Road (hatched green).

Figure 23: Indicative stopping up plan



3.7 Public realm

3.7.1 Existing conditions

The site is currently occupied by the former police station building and the surrounding public realm reflects the former use of the building, with bollards, guard rails and inactive frontages onto the public realm.

The site is currently occupied by a single block facing Harrow Road, Edgware Road and Newcastle Place with no permeability across the links. This part of Edgware Road is less vibrant than the section closer to Church Street. Other site constraints relating to the proximity to the A40 Westway and Edgware Road and barriers to transport hub (Edgware Road Underground station interchange) and green spaces such as Paddington Green. Figure 24 to Figure 26 show the current condition of the site.

Figure 24: Frontage of former police station building

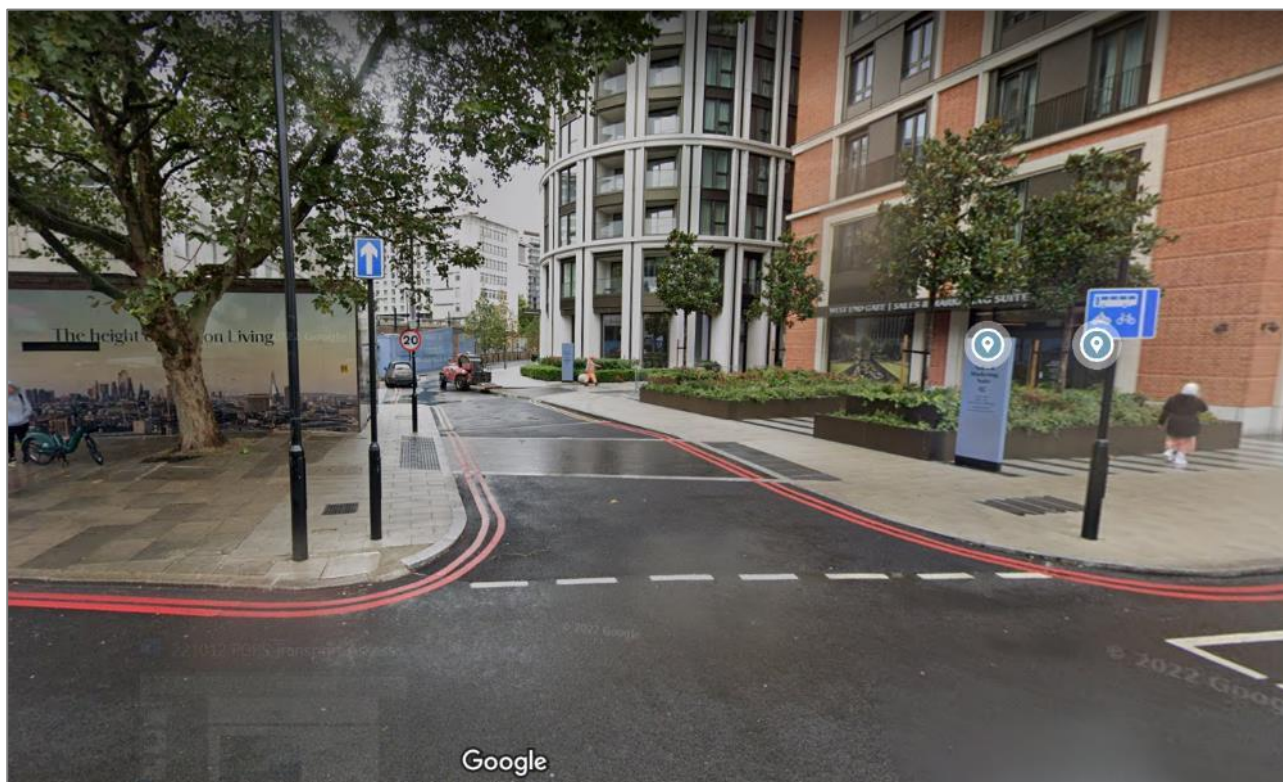


Figure 25: Paddington Green facing Newcastle Place and former police station building



Source: Google Streetview

Figure 26: View of Newcastle Place



(Source: Google Streetview (Oct 2022))

3.7.2 Proposed public realm

The proposed landscape plan is shown in Figure 27 and further information on the landscaping proposals can be referred to in the Landscape Masterplan that is submitted separately with this planning application.

The proposal seeks to maximise the soft landscaping and prioritise pedestrian and cycle movements (see Figure 27) and controlling vehicle access (via closing off of Newcastle Place). The central landscaped area contains play area and water features that emphasises on pedestrian activities for both the site users and the general public (refer to Figure 28). Vehicles are only expected to be using the landscaped area under emergency circumstances and provides a rejection lane for HGV drivers who injudiciously turn into the site contrary to the weight limit prohibition.

Figure 27: Proposed landscape plan

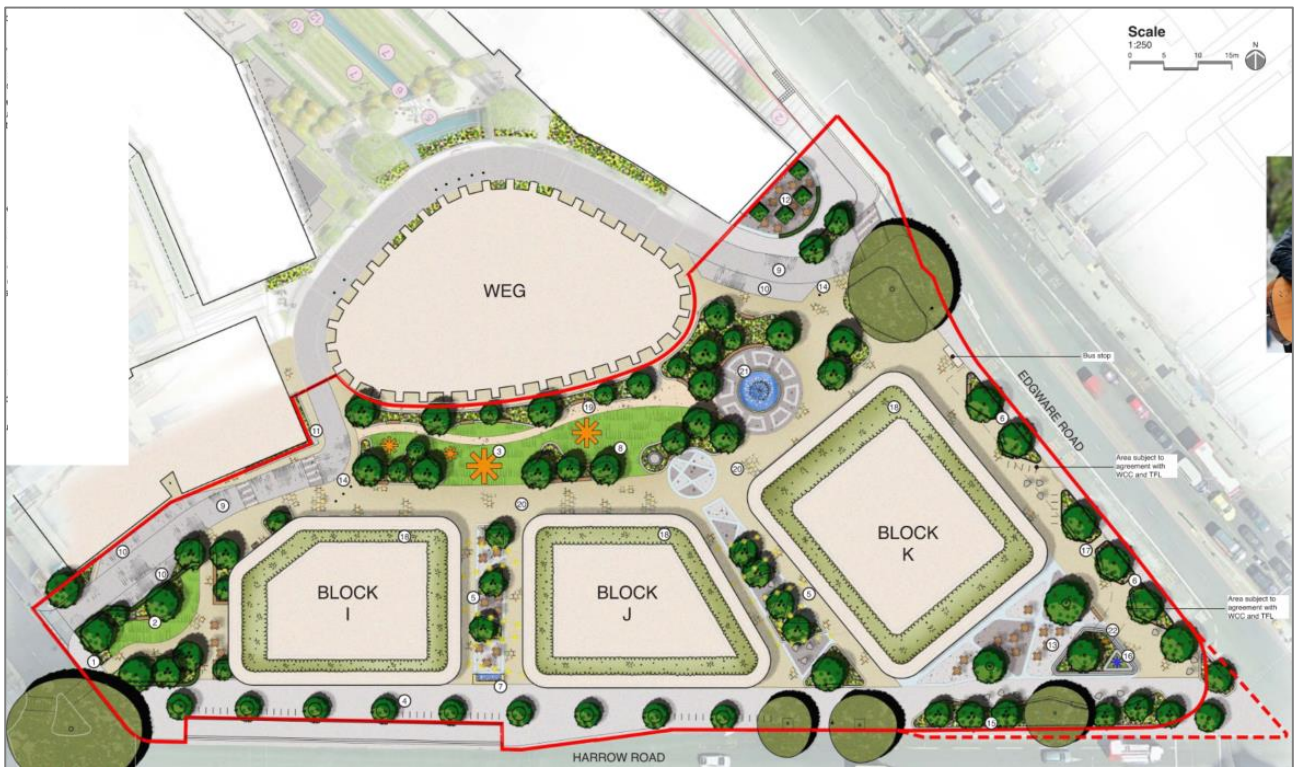


Figure 28: Artist impression of public realm on Newcastle Place

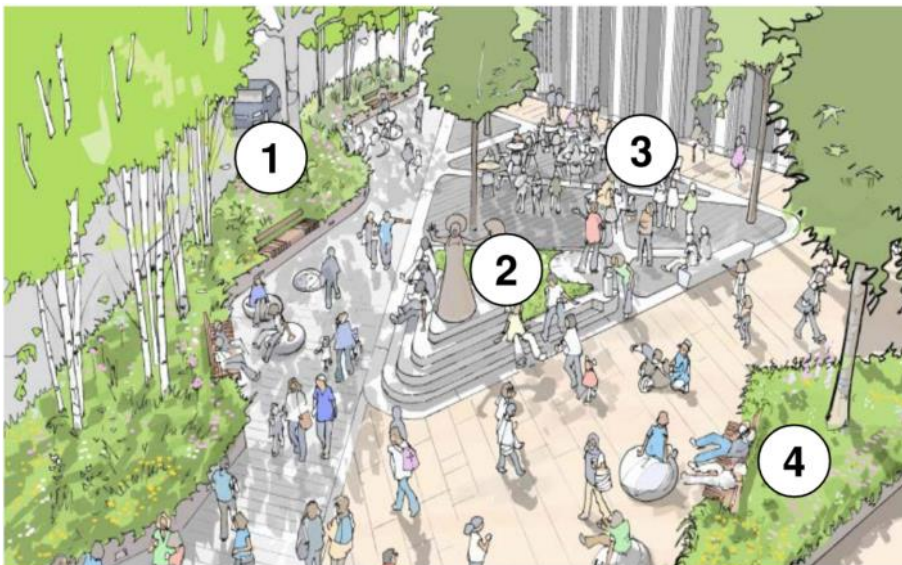




(Source: Artist impression by Squire and Partners)

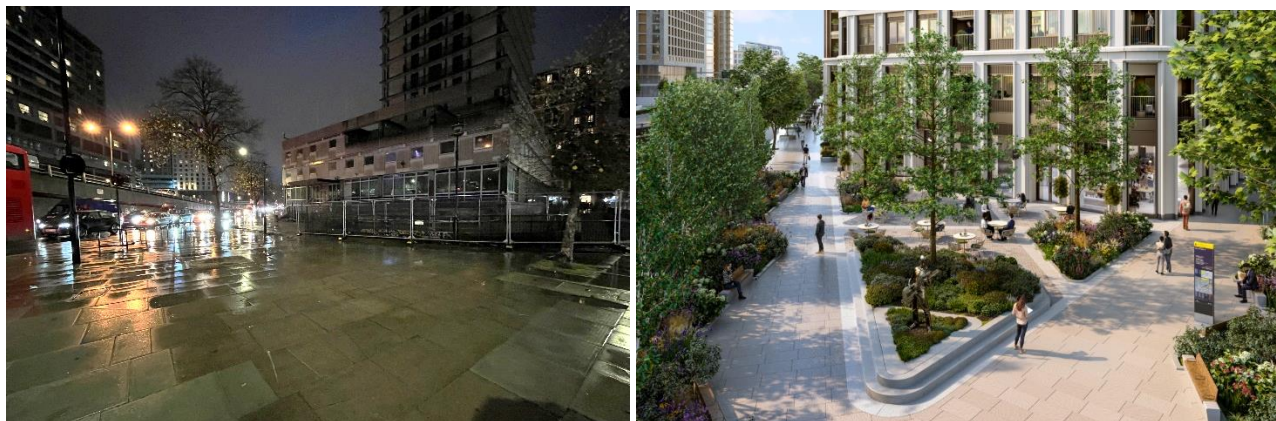
A new piazza is proposed at the corner of Edgware Road / Harrow Road directly opposite the underground station. Figure 29 demonstrates the design of the piazza and relevant to the Healthy Street indicators, Figure 30 shows a comparison between the existing open space and the proposed illustration of Edgware Road piazza; demonstrating a significant streetscape improvement from the existing provision. The proposed improvements contribute to creating attractive spaces surrounding the site and within the development, which encourage pedestrian and cyclist movements. Consultation with TfL has been undertaken to ensure this new public realm works alongside the Rain Garden scheme for the space. Continued detailed design will progress with TfL on this proposed space.

Figure 29: Illustration of proposed piazza and relevance to Healthy Street indicators



1. Planters designed as rain gardens with integrated seating. Acts as barrier from traffic and the associated air particulates and noise from Edgware Road / Harrow Road.
2. Main piazza space with feature paving, public art, and integrated seating – creating a space for people to stop and rest, and welcome ‘pedestrians from all walks of life’
3. Activation of the frontage by providing outdoor seating, create an attractive space that provides ‘things to see and do’
4. Planters with integrated seating that provide places to stop and rest in the shade.

Figure 30: Artist impression of the Edgware Road piazza and comparison with existing provision



(Source: Artist impression by Squire and Partners)

There are also streetscape improvements proposed on Harrow Road, with upgraded footways, landscaping and active frontages with the proposed commercial units. These are illustrated in Figure 31.

The corridors between Block J and K, connecting between Newcastle Place and Harrow Road, known as 'The Boulevards' provide additional permeability across the site. Raised planters with integrated seating and overhead catenary lighting provide a welcoming link with rest points and lighting. As part of the proposed development, a bus shelter is also proposed to replace the bus flag at the Stop EX Edgware Road.

Figure 31: Artist impression of Harrow Road



(Source: Artist impression by Squire and Partners)

3.8 Healthy Streets Check for Designers

The Healthy Streets Approach is a long-term plan for improving Londoners' and visitors' experiences of our streets, helping everyone to be more active and enjoy the health benefits of using our streets on a daily basis.

The 'Healthy Streets Indicators' are ten evidence-based indicators which define the important elements that makes streets appealing, healthy and inclusive places. Working towards these indicators on our street networks will contribute towards creating a healthier city. The ten healthy streets indicator are shown in Figure 32.

Figure 32: The Healthy Streets indicators



A number of useful tools have been developed as part of TfL's *Healthy Streets toolkit*¹, one of which is the "Healthy Streets Check for Designers" (HSCD). Whilst targeted more towards appraising proposed changes or options to existing streets and particularly presenting a comparison between the existing and proposed cases, it can also be used as a useful guide for the design of new streets.

HSCD is based on the scoring of a number of metrics that each, individually or combined, contribute to the ten Healthy Streets indicators. There are a total of 31 different metrics which relate to various elements such as vehicle traffic characteristics (e.g. volume, speed, noise, etc), design for pedestrians (e.g. crossing points, footpath width, lighting, surveillance etc), design for cycling (e.g. type and width of facility, priority at junctions, cycle parking etc), and down to more detailed items such as street trees and planting, spacing of benches, location of public transport stops, etc.

While many of these elements are subject to refinement, at planning stage a preliminary Healthy Streets appraisal can be undertaken to demonstrate how a typical street within the proposed development would be measured against the Healthy Streets indicators.

For PGPS, Healthy Streets Check for Designers has been undertaken for the street sections highlighted in Figure 33 for the existing and proposed situation. The results of the assessment are presented in Table 6.

¹ <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>

Figure 33: Healthy Streets Check street sections

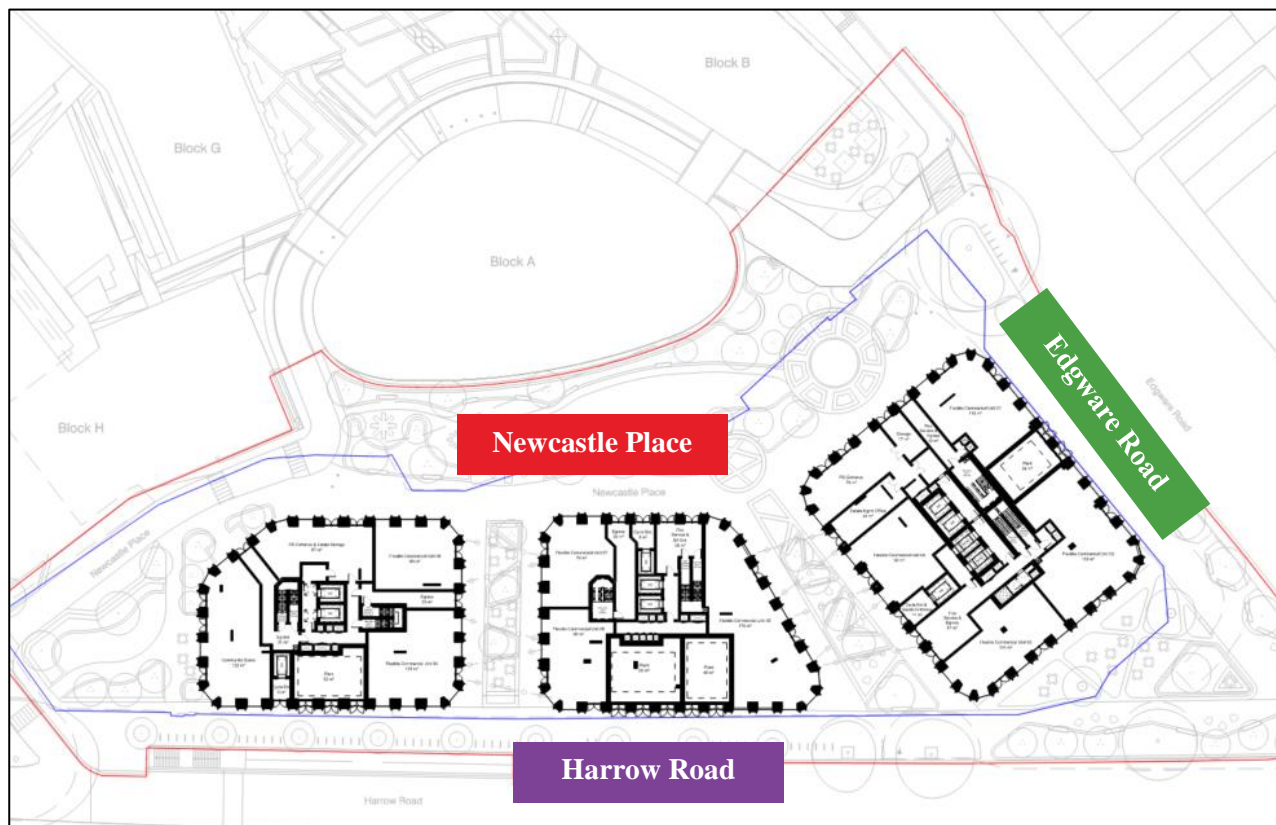


Table 6: Healthy Streets Check for Designers— scoring outputs

Healthy Streets Indicators' scores (%)	Newcastle Place		Edgware Road		Harrow Road	
	Existing	Proposed	Existing	Proposed	Existing	Proposed
Pedestrians from all walks of life	60	91	59	70	63	70
Easy to cross	60	90	53	57	53	57
Shade and shelter	33	83	33	83	50	67
Places to stop and rest	33	93	47	93	60	87
Not too noisy	53	93	33	60	47	67
People choose to walk, cycle and use public transport	60	91	59	70	63	70
People feel safe	60	92	62	73	65	73
Things to see and do	33	83	44	78	56	72
People feel relaxed	61	92	61	71	64	71
Clean Air	42	92	33	75	50	75
Overall Healthy Streets Check score	57	91	57	71	62	70
Number of 'zero' scores	0	0	1	1	1	1

Table 6 shows that the proposals will improve the Healthy Streets Check scores for all three streets, particularly evident on Newcastle Place. The detailed assessment is contained in Appendix F.

3.9 Car parking

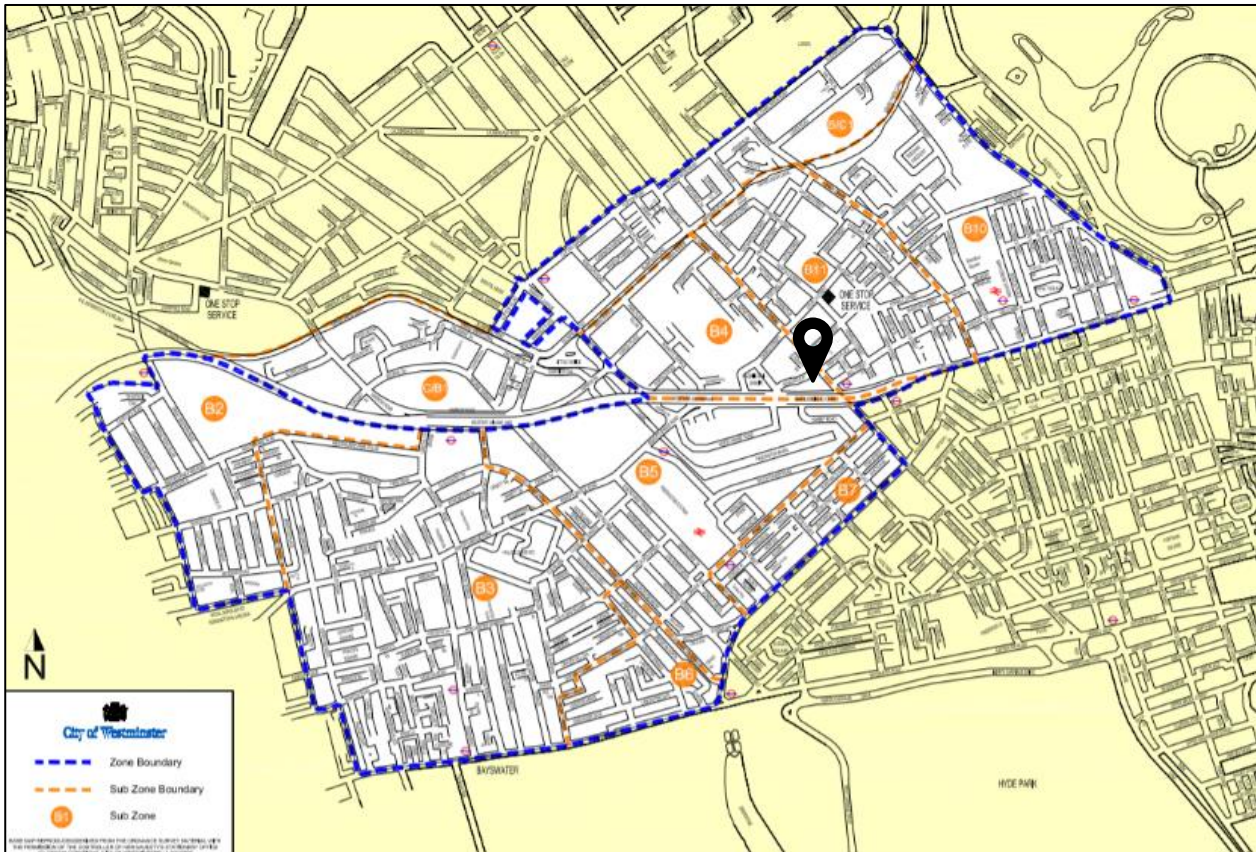
3.9.1 Existing car parking

As summarised in Section 1.3, Paddington Green Police Station has car parking at basement and podium levels which were accessed from Newcastle Place via secure entrance and exit ramps.

3.9.1.1 On-Street parking controls

Newcastle Place has double yellow lines on both sides. The site is located in Controlled Parking Zone (CPZ) B4. Zone B permit holders can park in any 'B' zone. The nearest on-street residential permit bays are located along Paddington Green and Church Street. WCC CPZ plan showing CPZ Zone B, together with the site location, is provided as Figure 34.

Figure 34: WCC Controlled Parking Zones



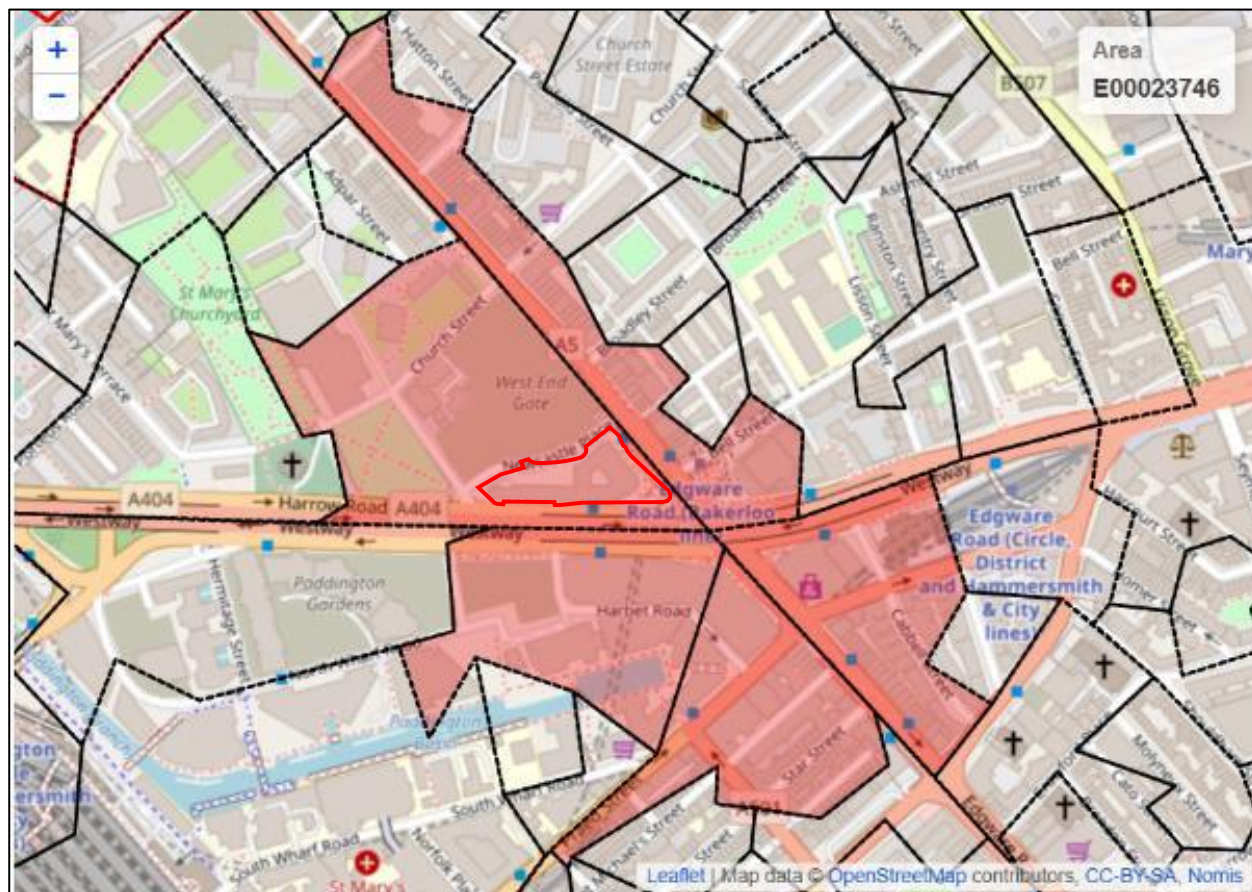
3.9.1.2 Census Travel to Work data

The 2011 Census has been used to ascertain the local level of car use for journeys to work; this is calculated at between 8-12%.

3.9.1.3 Car Ownership

2011 Census data on car ownership has been examined for the area shown in Figure 35. The data shows that 75% of homes in the local area do not own a car. The census data would not include new developments, which are more likely to have low car parking provision and increase the overall number of car-free households.

Figure 35: Census area examined for car ownership



3.9.2 Relevant policy review

3.9.2.1 Westminster City Council and London Plan Parking Standards

The proposed parking provision is in closer accordance with the WCC's City Plan 2019-2040 (2021) policies and London Plan (2021), which supports car-free at this location.

The 2021 City Plan now has shifted planning policy emphasis to car free development aligned with the maximum car parking standards set out in the London Plan (2021). This is a significant policy movement towards car free housing in the City of Westminster.

The policy context supports sustainable travel and reduce dominance of the private car, with an emphasis on not worsening on-street parking stress. The City Plan stipulates that *"Where a residential development without on- or off-site car parking is proposed in an area of existing high parking stress (i.e. over 80% of on-street parking spaces being occupied during the day or at night)... mitigation measures will be expected to off-set the impact of increased car parking on Westminster's streets."*

Residents and other users of the site would most likely travel sustainably using the wide range of existing public transport services available near the site, as well as walking or cycling. The key aim of the Mayor's Transport Strategy (2018) to achieve 80% of all trips in London to be made on foot, by cycle or using public transport by 2041; the mode share is even higher for trips in the central London.

3.9.2.2 Westminster City Council Climate Emergency

WCC has shared a Climate Emergency Action Plan in summer 2021, setting out comprehensive actions for reducing carbon emissions across the City. Amongst other highlights, the Action Plan includes measures to make transport more sustainable. In particular, there is emphasis on maximising walking, cycling and public transport as part of an overall travel hierarchy. The reduction in motorised transport provides a clear opportunity for achieving environmental and health co-benefits.

The proposed application which seeks a car free proposal will therefore align the development proposals more closely with the Action Plan by encouraging active and sustainable travel behaviour.

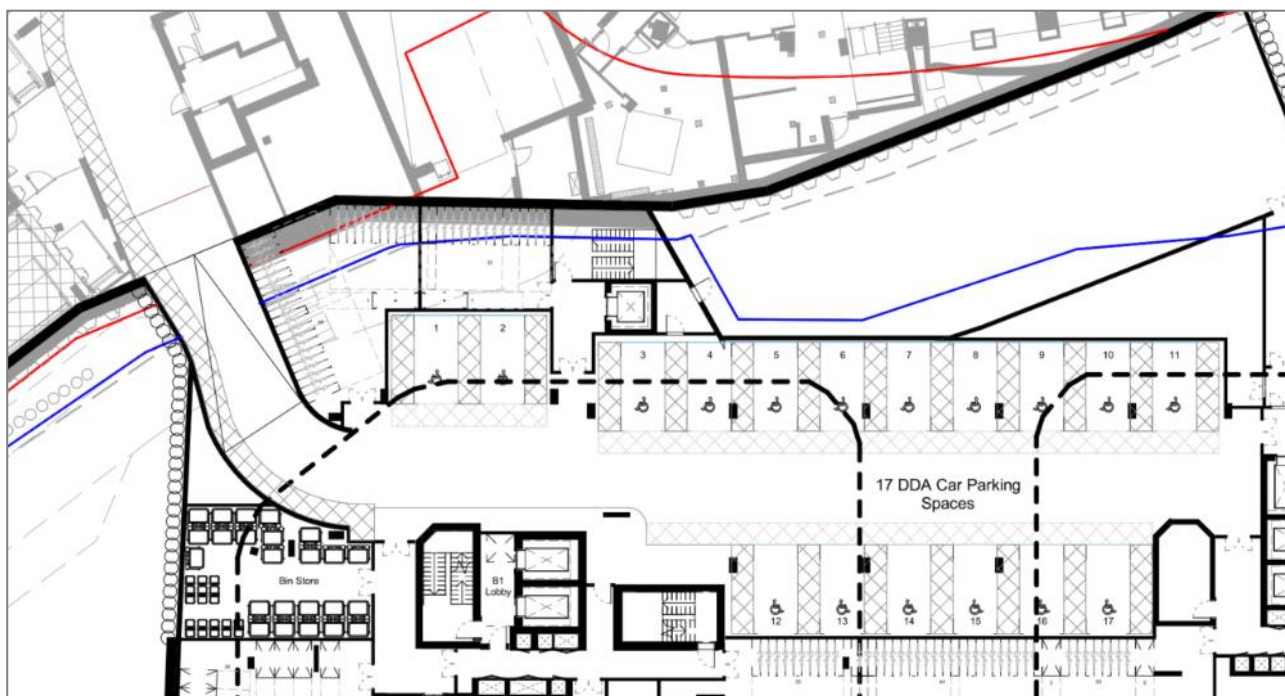
3.9.3 Proposed parking provision

In line with the London Plan and WCC City Plan, the proposed development will be car-free, with 17 accessible parking spaces provided at B1 basement level:

- Provision of 17 spaces meets the 3% disabled car parking provision set out within the London Plan for the proposed 556 dwellings. Car parking spaces are only leased to residents.
- Electric vehicle charging points will be provided in line with WCC City Plan, which requires 50% of car parking spaces at B1 of the PGPS basement to be provided with active charging points and the remaining 50% with passive provision.

The PGPS car park will be accessed via Church Street and the WEG basement. The proposed layout of the car park (B1 basement level) is shown in Figure 36.

Figure 36: Proposed basement car park layout



3.9.4 Proposed car park access arrangements

The 17 accessible car parking spaces for PGPS are provided in the Basement level 1 of the site. Residents will enter and exit the proposed car park using the WEG Church Street entrance, and via a one-way ramp that connects between the PGPS basement and the WEG basement at Basement level 1. The arrangement is illustrated in Figure 37 and the swept path analysis is shown in Figure 38 (extracted from Drawing 277685-SK-045-D in Appendix B).

The gradient of the ramp is 1:15. This is compliant with the design guidance for underground car parks. The width of the ramp is 4.5m on the straight section and widens to 5m around the bend. This allows for a dedicated pedestrian/cyclist route (1.2m) along the ramp, a travelling car and 300mm of clearance from the wall.

As the ramp between WEG basement and the PGPS car park has a one-way arrangement. Signal arrangement is required to manage two-way access. Two sets of signals have been placed as indicated in Figure 38. The proposed access strategy is as follows:

- The two signals for the outbound vehicles will remain green, with the egressing movements prioritised as default
- Residents would use a fob key to enter the car park from Church Street.
- The fob key will request green at the signal for the inbound cars.
- The signals for the outbound vehicles will then turn red – vehicles wishing to egress the car park will then have a signal indication not progress beyond the stop line, as illustrated in Figure 38. Given that some of the disabled parking spaces are beyond the stop line, the secondary signal head will be located at the start of the one way route to provide an indication to keep the area in front of the ramp clear to allow for incoming vehicles.

Figure 37: Vehicular access to proposed PGPS basement car park

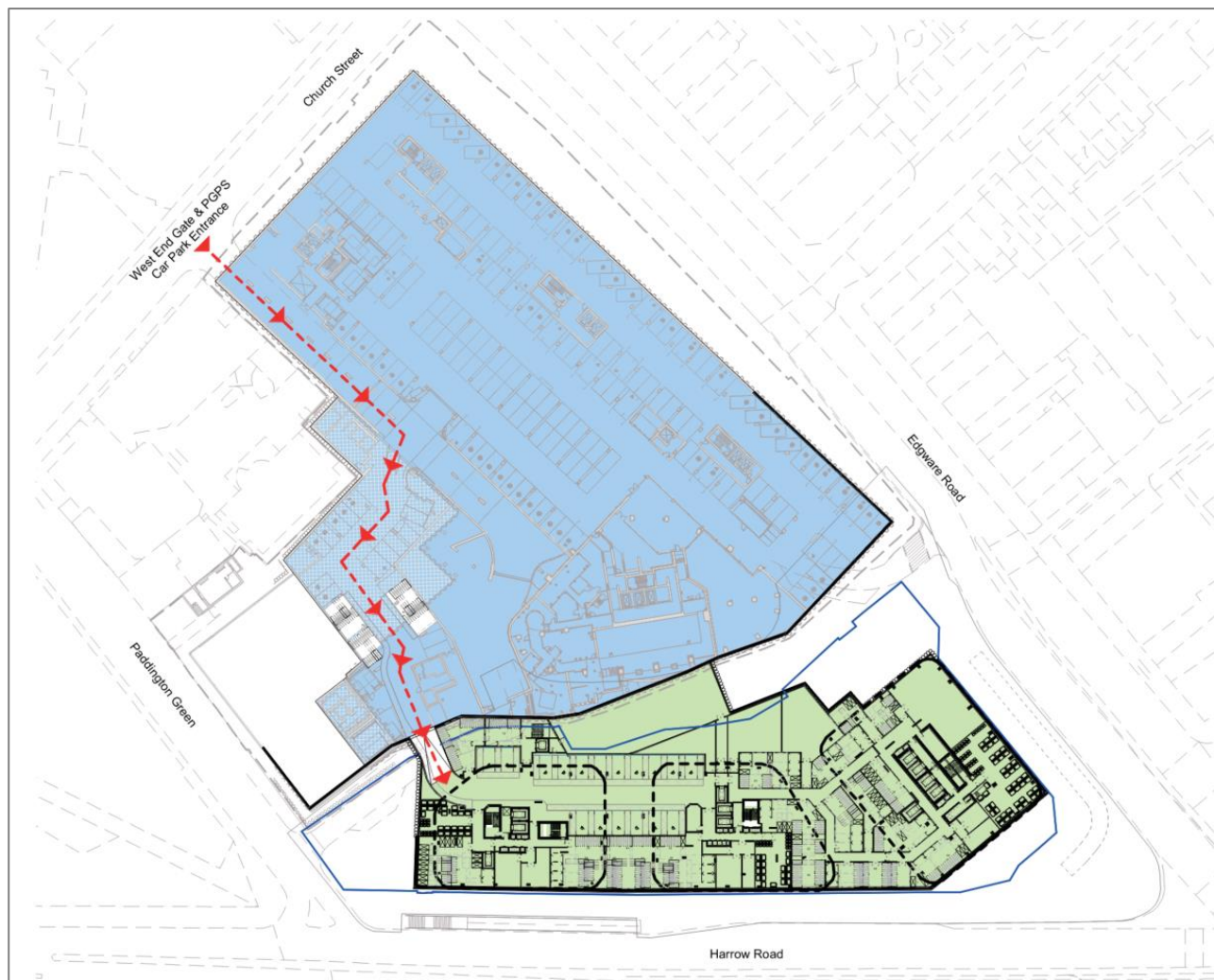
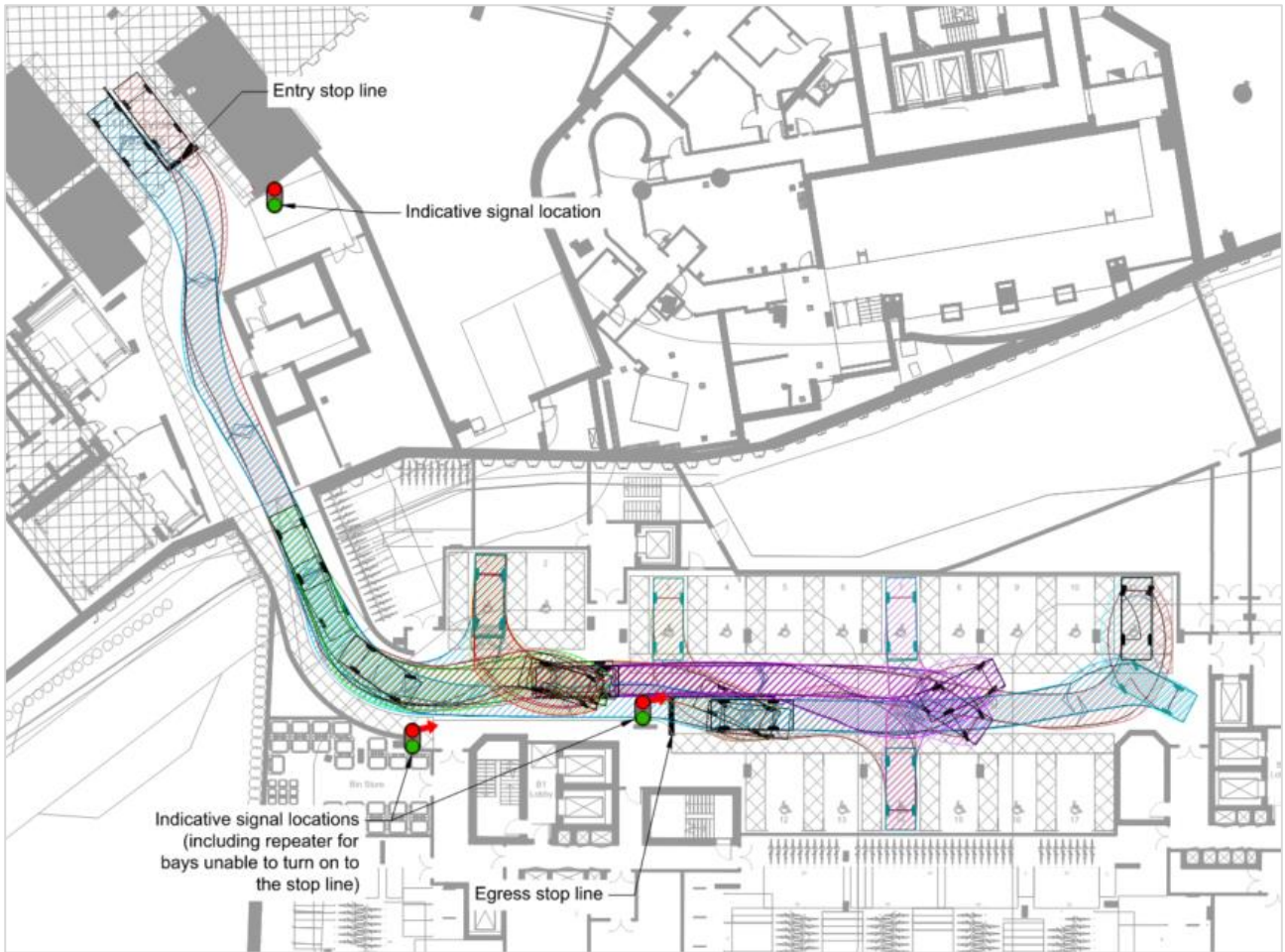


Figure 38: Proposed basement car park – swept path analysis & indicative signal arrangement

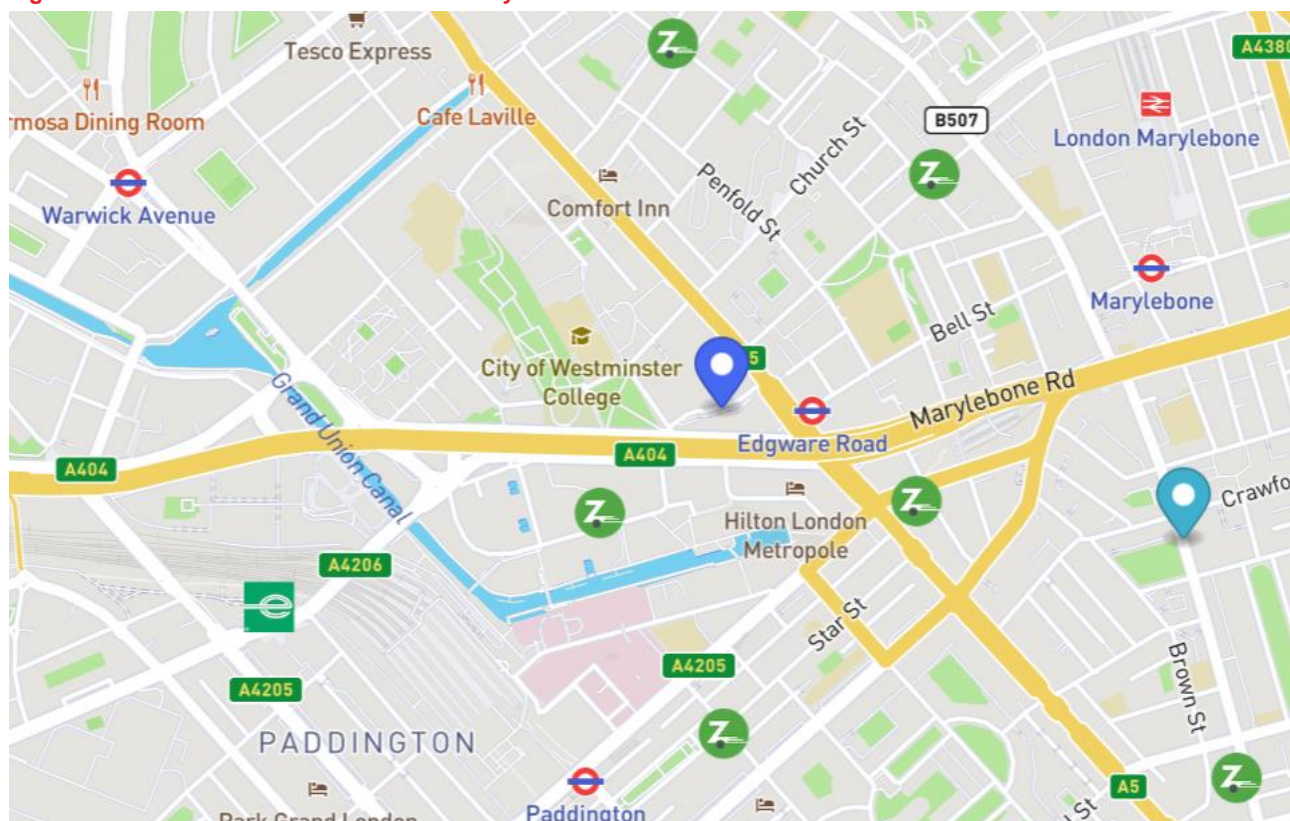


3.10 Car clubs

There are car club vehicles in the local area which operate on fixed and ‘flexible’ locations (no fixed bays). The nearest car clubs are as follows and the locations are shown in Figure 39:

- Zipcar – 1 van, 30 Bell Street
- Zipcar – 2 cars, Merchant Square, Harbet Road
- Zipcar – 1 car, Chapel Street
- Zipcar – 1 van, Cuthbert Street
- Zipcar – 1 car, 89 Bell Street
- Zipcar Flex – 1 car, Bouverie Place

Figure 39: Locations of car clubs in the vicinity of the site



As agreed with TfL during pre-application discussions for the former application, the proposed development will prioritise encouraging sustainable active travel patterns and no Car Clubs will be provided within the development.

3.11 Delivery and servicing

3.11.1 Existing arrangements

There is an off-street loading area adjacent to Newcastle Place at the eastern end of the existing Paddington Green Police Station. Any large deliveries by HGVs would use Newcastle Place, where loading is permitted on the double yellow lines. Waste collection takes place from Newcastle Place.

3.11.2 Proposed arrangements

The proposed approach to deliveries and servicing is in keeping with the principles at the WEG development. At WEG, a basement servicing area is provided, accessed from Church Street. The on-street layby that is currently provided on Newcastle Place immediately to the south of The Westmark will be removed for construction of the PGPS proposals. This layby will be re-provided along the loop street with the new proposals.

The proposed delivery and servicing strategy for PGPS is as follows and a Delivery and Servicing Plan (DSP) is included in Appendix D:

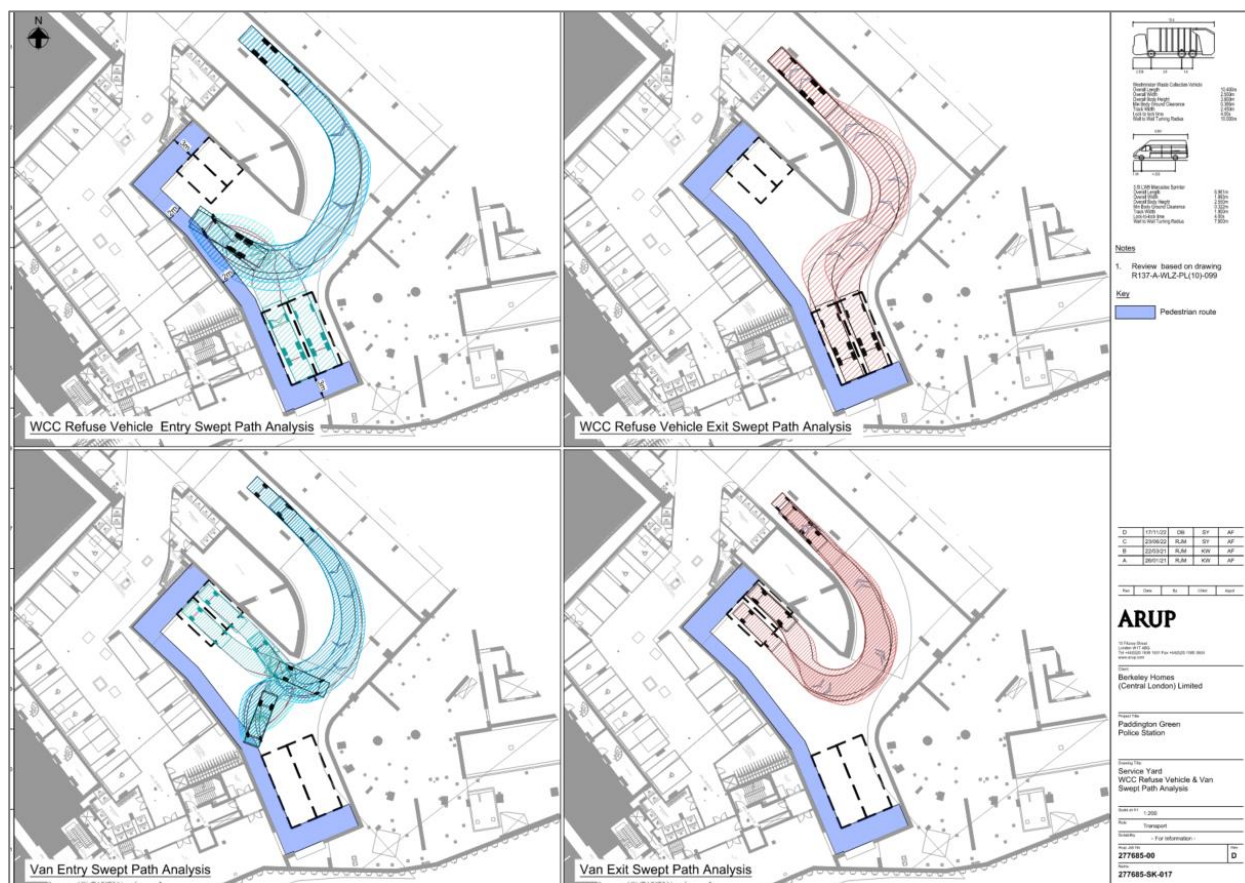
- All commercial deliveries, residential bulky HGV deliveries and refuse collection to take place in the WEG B2 basement. Any special residential deliveries or residential move in / move out activities can also be pre-booked in the basement.
- Ad-hoc residential deliveries will take place on-street along the loop street and Newcastle Place. Vehicular access to be gained via Edgware Road / Newcastle Place junction. Vehicles will travel one way westbound and can use the three proposed laybys along Newcastle Place for unloading goods. Access to the Edgware Road / Newcastle Place junction will be restricted to vehicles below 7.5T.

3.11.2.1 WEG Basement

The WEG basement is accessed from Church Street and the design and access arrangements were consented as part of the WEG applications. A servicing area is provided at the B2 Basement and the design has been developed further to show the area can accommodate two HGV bays and two LGV bays.

The layout of the servicing area at WEG B2 basement is shown in Figure 40 (Drawing 277685-SK-017-D, also contained in Appendix B), together with the swept path of a WCC refuse collection vehicle and goods vehicles. A scaled drawing of the swept paths is contained in the DSP.

Figure 40: WEG basement servicing area and swept path analysis



Goods will be transported from PGPS B2 basement service yard to B1 basement via a lift. Goods will then be brought to ground level via the servicing lifts at each block. Further details of the goods movements can be referred to in the DSP contained in Appendix D.

Refuse will be stored in the PGPS B1 basement. The Estate Management Team will then transport the bins from the PGPS B1 bin stores to PGPS B2 basement service yard via a lift prior to collection. A separate Operational Waste Management Strategy prepared by Arup is submitted with the planning application.

3.11.2.2 Newcastle Place

Newcastle Place will be treated as a pedestrianised zone, with emergency / rejection vehicle access permitted along its length. The revised submission maximises the provision of landscaping adjacent the building blocks and incorporates a play area (south of The Westmark). The design principles of the Newcastle Place have been consulted and agreed with GLA and TfL in the pre-application stage.

There will be uncontrolled access for vehicles up to 7.5T around the northern side of The Westmark, along the existing one-way loop street (westbound). Weight restriction signage will be placed at the junction with Edgware Road. Any larger goods vehicles that have inadvertently accessed Newcastle Place would be permitted through the controlled pedestrianised zone, which would otherwise be controlled by the bollard precluding access.

The landscape plan is shown on Figure 27 and swept path analysis of the loop street and Newcastle Place is illustrated in Figure 21.

4. Active Travel Zone

4.1 Context

The Active Travel Zone (ATZ) assessment is a component of the Healthy Streets TA approach. As agreed with TfL during the pre-application meeting for the April 2021 application, a desktop assessment has been undertaken. As part of the 2022 replacement TA, the ATZ routes have been reviewed, including a review of the key attractors and a repeat site visit to the key routes.

According to TfL's ATZ guidance, the purpose of an ATZ assessment is to appraise the key active travel routes to and from the site, which comprise those routes to nearby public transport interchanges and key destinations, and identify where gaps or shortcomings exist. When assessing the ATZ, additional considerations have been given to the social-economically diverse background of the local neighbourhoods and the issues on crime and security.

Whilst not a requirement from the TfL ATZ guidance, an additional assessment has been provided in this chapter to consider the night-time routings to the key attractors that are in operation after dark. This is in line with consultations with TfL and the Mayor's commitment for women to feel confident and welcome travelling in London at night-time, as part of the Women's Night Safety Charter (originally launched in 2018).

The ATZ is not intended to be a detailed security and crime assessment to help remedy the local issues or upgrade the entire extent for active travel by the general public. When appraising the key active travel routes, where relevant, recommendations as to how conditions for active travel can be improved by WCC and TfL have been outlined, and on which routes these improvements could best be focused. It should be noted that any recommendation identified are opportunities for the authorities to review and consider. They are not specifically linked to the proposed development.

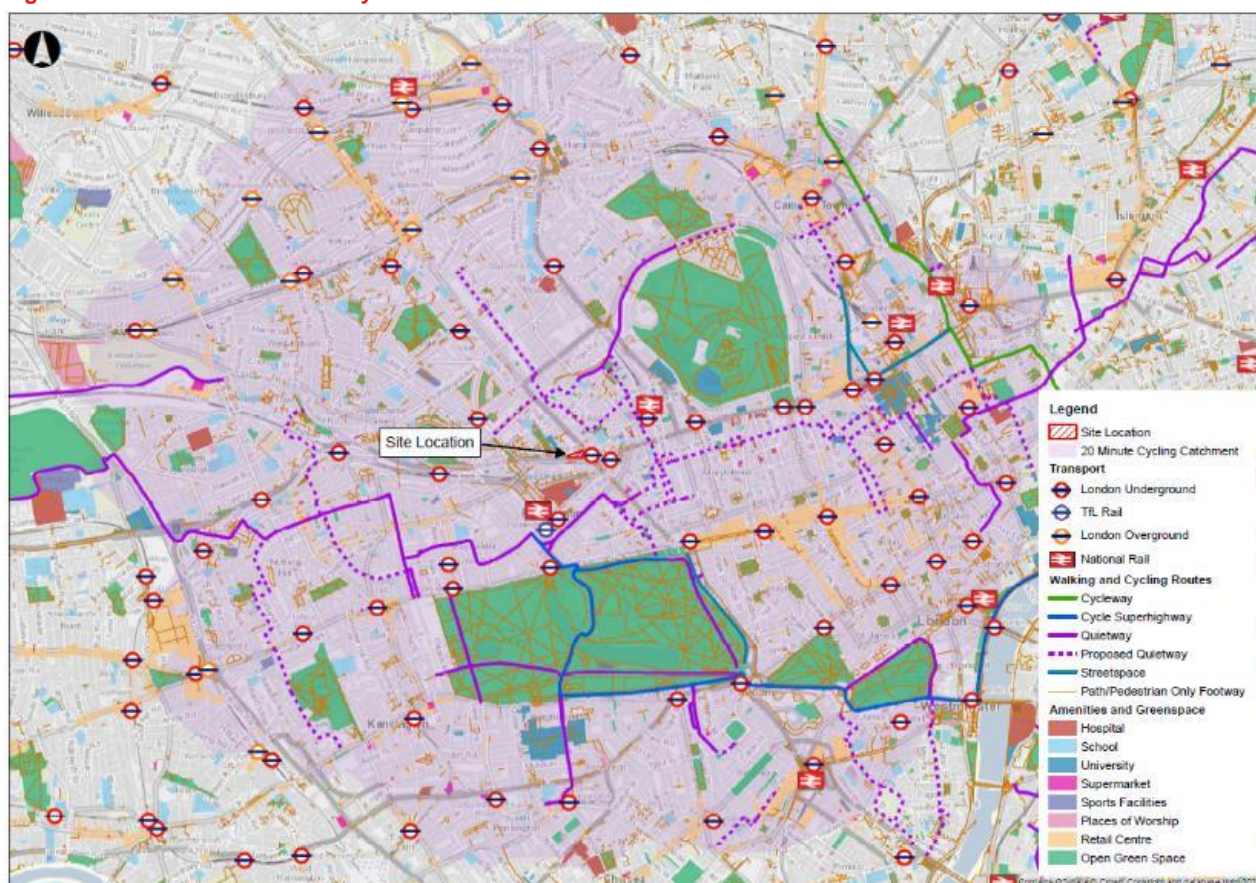
Nevertheless, the proposed development will naturally increase the local residential population and the volume of site users. The level of passive surveillance and activity would also help improve the perception of personal security compared to the unoccupied site. In addition, subject to discussion and agreements with WCC and TfL, a number of on- and off-site improvements have been identified with the delivery of the proposed development which would assist with active travel within the Active Travel Zone both during the day and night time. These improvements are set out below and will be referenced in the route appraisals:

- Bus shelters provision with countdown displays (Edgware Road and Harrow Road) – as part of WEG and PGPS
- Subway improvements scheme
- Upgrade to TfL's Rain Garden scheme
- Streetscape and soft landscaping improvements along Edgware Road and Harrow Road
- Placemaking features at the site entrance fronting Edgware Road / Harrow Road junction
- Newcastle Place public realm improvements including play area with planting and integrated seating

4.2 ATZ extent

The ATZ is defined as a 20-minute cycle distance from a site, representing a comfortable and realistic time people might be willing to travel without the use of a motor vehicle. Figure 41 presents the 20-minute cycling extent from the site.

Figure 41: ATZ catchment and key destinations



In line with the categories set out in the TfL guidance, the most relevant key destinations and those that are most likely to be accessed using active transport modes from the site are identified in Table 7.

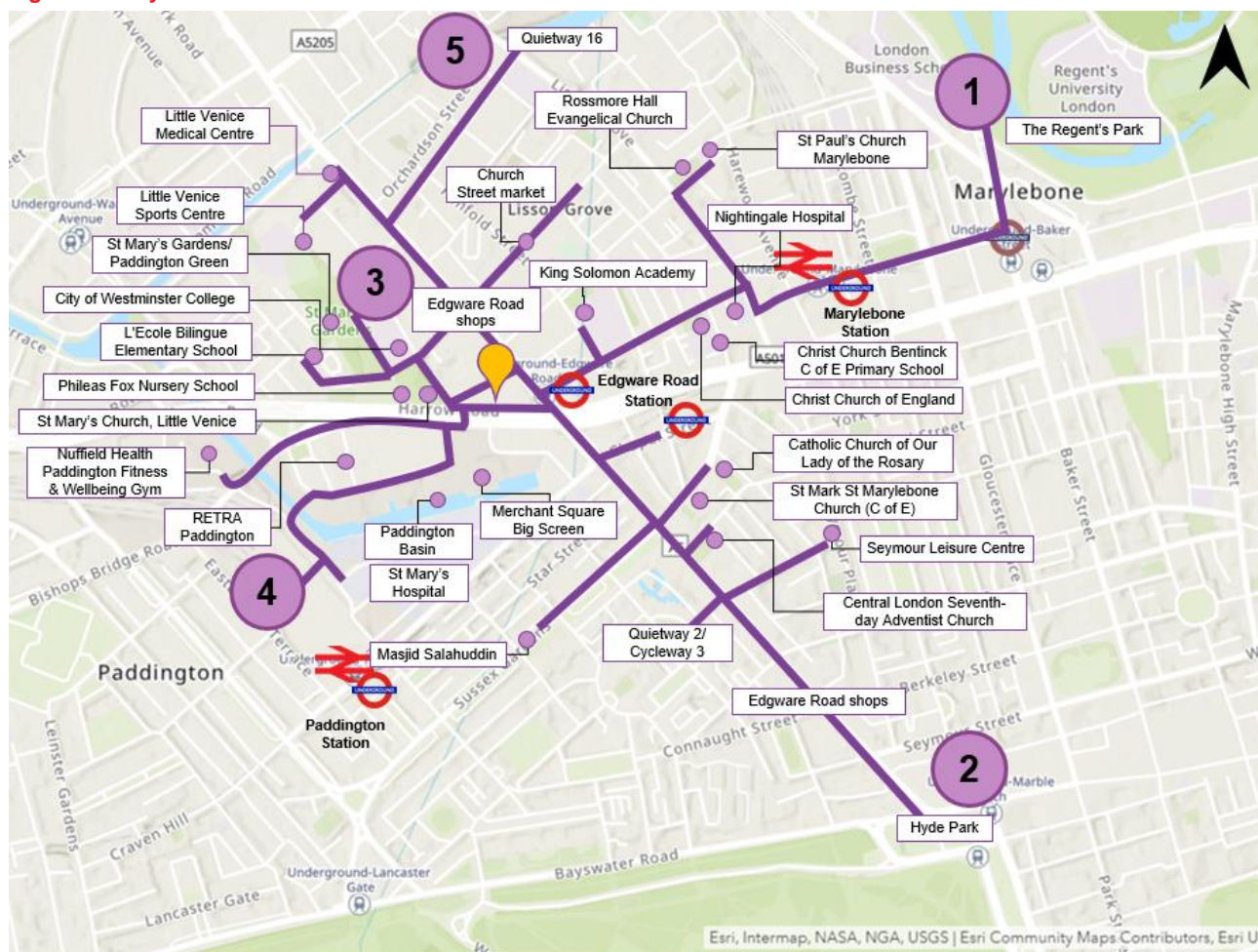
Table 7: Key destinations from the site

Categories	Key Destinations
Public transport stops	Bus stops EM/EC, EX/EW, ET, ED, LN/LJ
Public transport stations	Edgware Road stations, Paddington railway station, Marylebone railway station
London's current and future London-wide strategic cycle network	Cycleway 3, Quietway 2, Quietway 16
Town centres	Edgware Road
Parks/green space	Paddington Green, St Mary's Churchyard, Hyde Park, The Regent's Park
Schools/colleges	King Solomon Academy, Phileas Fox Nursery School, L'Ecole Bilingue Elementary school, City of Westminster College, Christ Church Bentinck C of E Primary School, Marylebone Boy's School
Hospitals/doctors	St Mary's Hospital, NHS Nightingale Hospital, Little Venice medical centre, Lisson Grove medical centre
Places of worship	St David's Welsh Church, Christ Church of England, Central London Seventh-day Adventist Church, Catholic Church of Our Lady of the Rosary, Masjid Salahuddin, Rossmore Hall Evangelical Church
Cultural	Church Street market, Merchant Square Big Screen, RETRA Paddington, Nuffield Health Paddington Fitness & Wellbeing Gym, Little Venice Sports Centre, Seymour Leisure Centre

4.3 Key Active Travel Routes

Based on the identified key destinations, five key routes have been identified to capture the key destinations that are most likely to attract active travel trips for the ATZ assessment. The routes are shown in Figure 42. In line with TfL's pre-application comments related to the proposed development re-submission (dated 18th November 2022), the ATZ has been expanded to include 'cultural' destinations.

Figure 42: Key Active Travel Routes and attractors



In addition to Figure 42, alternative routes to the key attractors that operate past 17:00 (potentially after-dark) have been identified (e.g. excluded primary schools). These routes are chosen with consideration to the conditions when travelling at night, such as lighting, perception of safety and legibility of the roads. The night-time routes assessment has been accompanied by a site visit after dark to understand the look and feel of the key routes.

The site benefits from being located at the junction of two key travel corridors (Edgware Road and Harrow Road / Marylebone Road), which remain busy with all street users through-out the day and night which can enhance the perception of personal security at night. These corridors facilitate active travel for the majority of the routes identified.

Figure 43 show alternative routes to the five active travel routes that site users can use to reach the key attractors at night. These routes follow the main roads / key thoroughfare and areas with active and passive surveillance provided by shop frontages or residential buildings. Whilst all streets should feel safe for use at night, these alternative routes demonstrate an alternative to subways or quieter links which some street users may perceived as 'less safe' to travel at night-time. Figure 43 demonstrates that there is a reasonably direct route choice at night-time. The public realm and off-site improvements provided by the proposed development would further enhance the night-time provision for active travel (summarised in subsequent sections).

Figure 43: Key Active Travel Routes and attractors (alternative route choice for night-time)

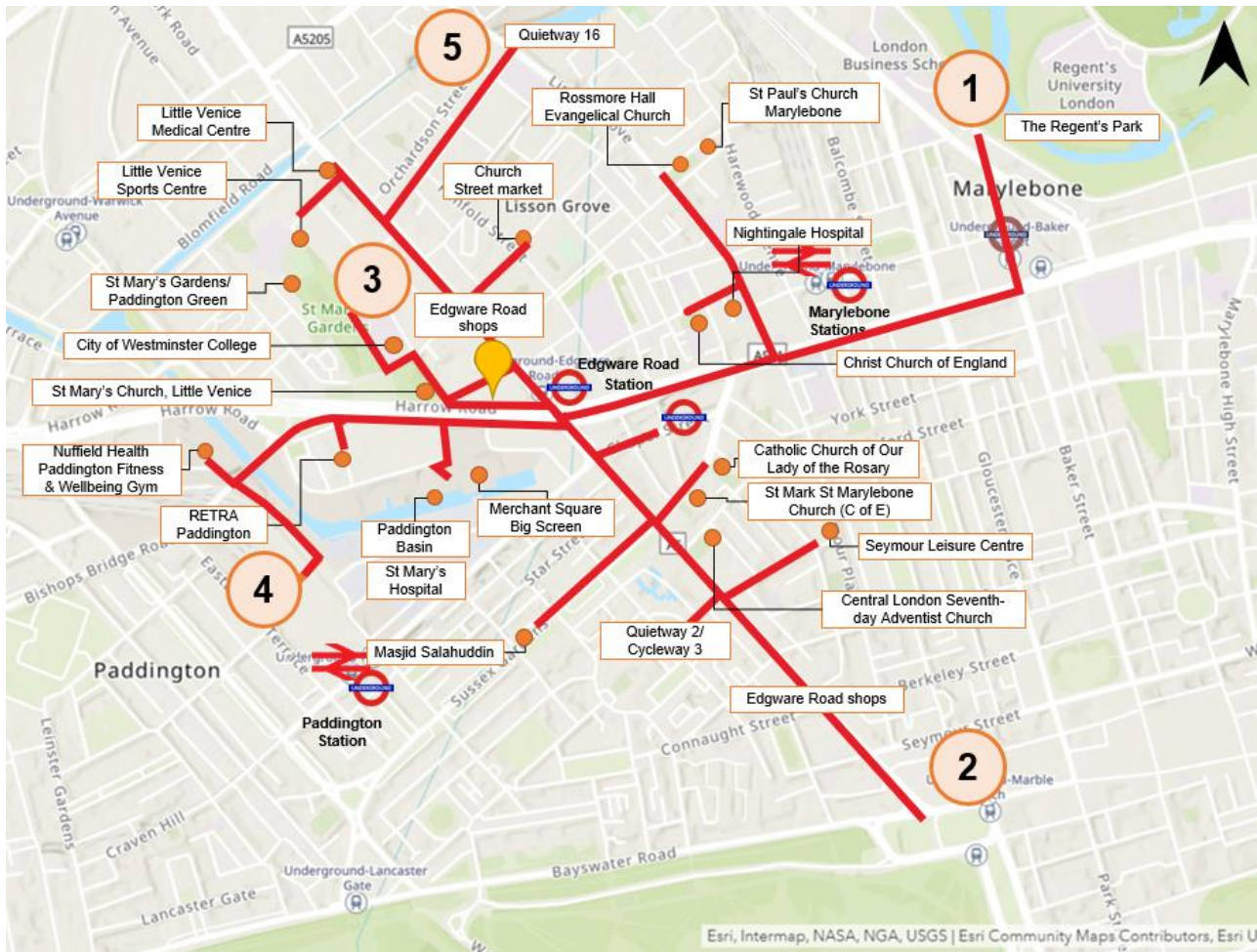


Table 8: Key Active Travel Routes and key destinations

Routes	Directions	Key Destinations
1	Towards the Regent's Park	King Solomon Academy, Christ Church of England, Christ Church Bentinck C of E Primary School, Nightingale Hospital, Rossmore Hall Evangelical Church, St Paul's Church Marylebone, Marylebone Stations, The Regent's Park
2	Towards Hyde Park	Edgware Road stations, Catholic Church of Our Lady of the Rosary, Seymour Leisure Centre, St Mark St Marylebone Church (C of E), Central London Seventh-day Adventist Church, Edgware Road shops, Quietway 2/ Cycleway 3, Masjid Salahuddin, Hyde Park
3	Towards St Mary's Gardens	Paddington Green, St Mary's Gardens, City of Westminster College, St Mary's Church Little Venice, Phileas Fox Nursery, L'Ecole Bilingue Elementary School
4	Towards Paddington Station and Sheldon Square	Paddington Basin, St Mary's Hospital, Merchant Square Big Screen, RETRA Paddington, Nuffield Health Paddington Fitness & Wellbeing Gym, Paddington Stations
5	Towards Regent's Canal (Quietway 16)	Little Venice Medical Centre, Edgware Road shops, including Church Street Market, Little Venice Sports Centre, Quietway 16

4.3.1 Route 1 – Towards the Regent's Park

Route 1 is to the east of the site, along Bell Street, Lisson Grove, Melcombe Place, Dorset Square and Baker Street towards Regent's Park, as shown in Figure 44.

There are local destinations along this route and it provides access to Edgware Road and Marylebone stations. The route runs approximately parallel to the A501 Marylebone Road, but this route has lower traffic flows and provides a more attractive and shorter pedestrian route to destinations. Footways and pedestrian crossings are provided along this route.

The alternative route avoids using the local street, travelling along the main roads e.g. Marylebone Road and Lisson Grove. Most of the trip attractors are located immediately off the key thoroughfare with regular lighting provision, buildings with active frontages and are generally wider, legible routes. The relatively higher volume of street activity along these streets provides a greater degree of passive surveillance, facilitating the perception of safer street access to these destinations during night-time.

Key photos along the route are shown in Figure 45 and observations and opportunities for improvements are provided in Table 9.

Figure 44: Route 1

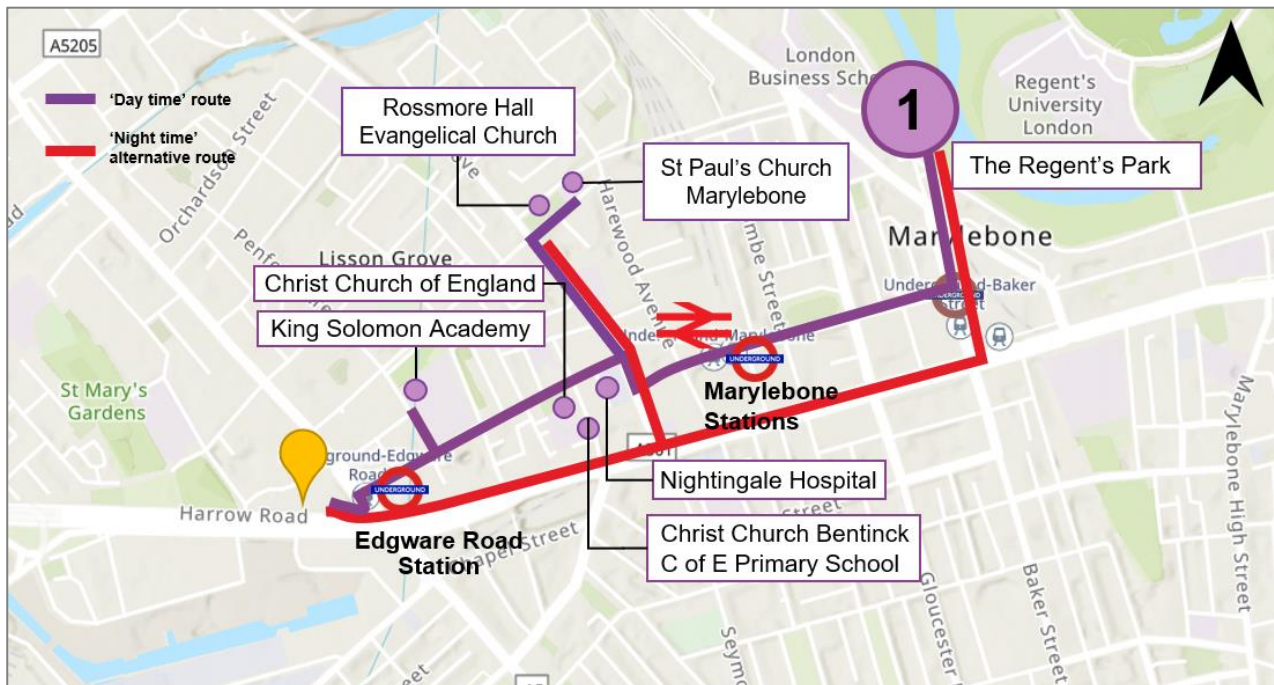


Figure 45: Key photos along Route 1 (towards Regent's Park)

Typical frontage and on-street parking along Bell Street / Melcombe Street / Baker Street.



Bell Street to Penfold Street towards King Solomon Academy.



Marylebone Road (night time)



Crossings close to Marylebone station



Crossing facilities at Lisson Grove / Melcombe Street junction



Dorset Square



Melcombe Street



Source: Google Streetview

Baker Street



Table 9: Route 1 Healthy Streets indicators and opportunities for improvements

Observations	Relevant Healthy Streets Indicators to Consider	Opportunities for the Highway Authority to Improve
<p>Sheffield stands are present along the route.</p> <p>Cycle routes are clearly marked on street with clear signage.</p> <p>Schools and shops along the route provide good active frontage and passive surveillance.</p> <p>Guardrails present at crossings, especially close to schools.</p> <p>Mix of crossing facilities are provided including zebra crossings / signalised crossings.</p> <p>Dropped kerbs present along the route, some have tactile paving but not all.</p> <p>Footway along Bell Street relatively narrower, and there are trees and street furniture.</p> <p>Parts of Baker Street may have relatively higher level of traffic compared to the rest of the route, possibly resulting in lower air quality and noise pollution.</p> <p>Marylebone Road and Baker Street are busy thoroughfares with an active night life and several night bus routes travelling along these roads.</p>	<p>Pedestrians from all walks of life</p> <p>Easy to cross</p> <p>People feel safe</p> <p>Things to see and do</p> <p>Place to stop and rest</p>	<p>Improve maintenance of footway paving where required.</p> <p>Provide tactile paving at dropped kerbs, where appropriate, to assist all users.</p> <p>Review locations of street furniture and reduce street clutter where possible.</p> <p>Proposed improvement with PGPS:</p> <p>The development will provide a new piazza at the junction of Edgware Road and Harrow Road, with high quality finish, public art, seating area, landscape features that act as a filter from the traffic and air pollution from the arterial roads (detailed in Section 3.7.2).</p>

4.3.2 Route 2 – Towards Hyde Park

Route 2 is to the south of the site, along Edgware Road towards Hyde Park, as shown in Figure 46.

This is a vibrant route with shops and amenities along Edgware Road. Edgware Road is dual carriageway along the entirety of the route and it is along a key bus corridor. Footways and pedestrian crossings are provided.

All the attractors along this route can be open during night-time (17:00 or later). Routes to reach these destinations during the night are the same as routes taken during the day. These routes go along Edgware Road, a busy thoroughfare with an active nightlife and several night buses travelling along the road. Adjacent to Edgware Road, some of the routes go along Sussex Gardens and Harrowby Street which are streets that are lined with residential buildings that offer passive surveillance at night.

Key photos along the route are shown in Figure 47 and observations and opportunities for improvements are provided in Table 10.

Figure 46: Route 2

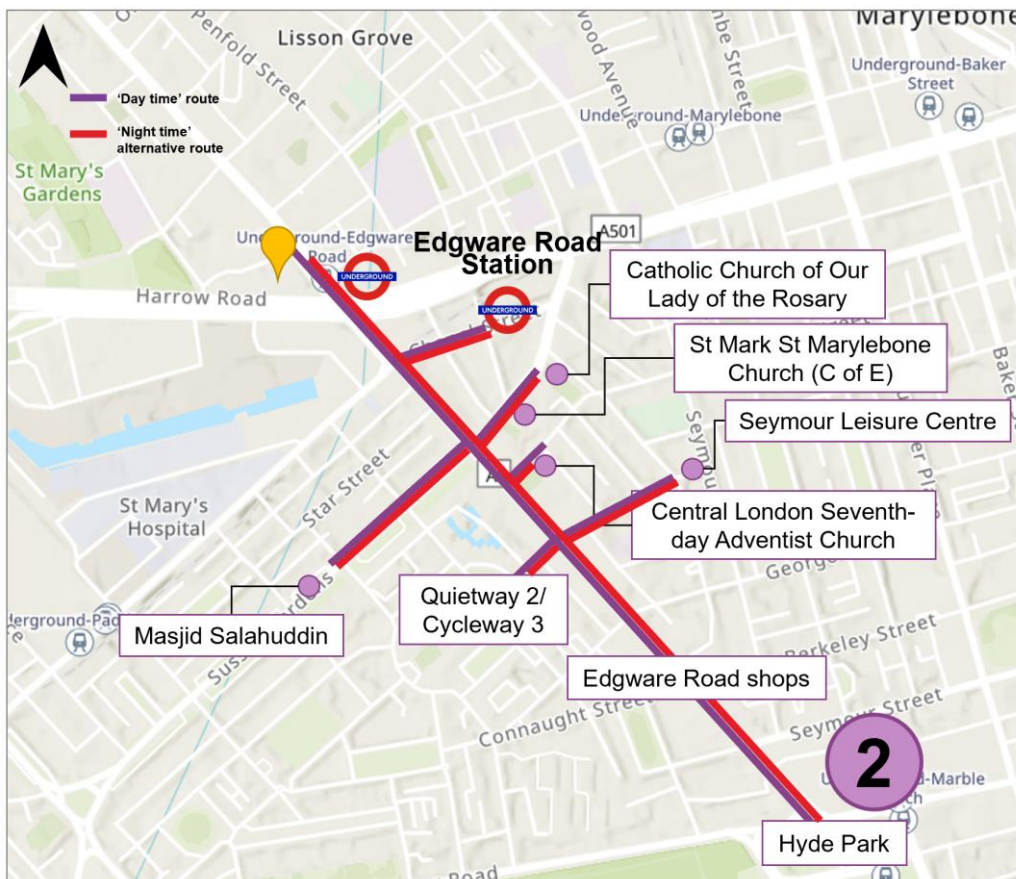
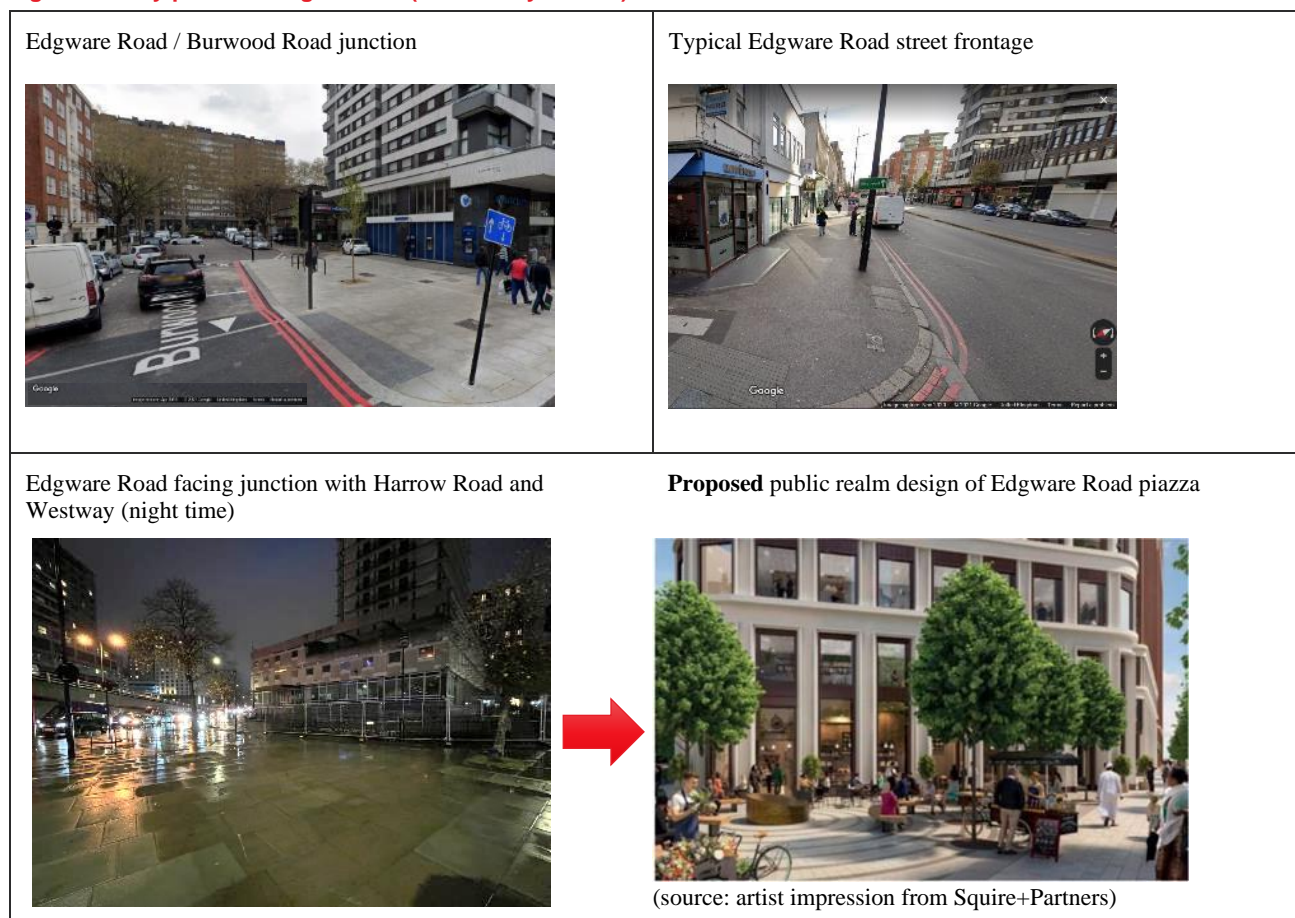


Figure 47: Key photos along Route 2 (towards Hyde Park)



<p>Edgware Road / Harrowby Street junction</p>  <p>Source: Google Streetview</p>	<p>Edgware Road / Bayswater Road junction</p> 
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Table 10: Route 2 Healthy Streets indicators and opportunities for improvements

Observations	Relevant Healthy Streets Indicators to Consider	Opportunities for the Highway Authority to Improve
<p>Dual carriageway on Edgware Road which can be noisy and likely to have low air quality.</p> <p>Street furniture locations on footways could potentially affect pedestrian flow capacity.</p> <p>Bus stops adjacent to the site only provides a bus flag, rather than shelter and seating.</p> <p>Generally wide footways along Edgware Road.</p> <p>Tactile paving and dropped kerbs are present. Some paving requires repairing / maintenance.</p> <p>Frequent signalised pedestrian crossing points along the route which makes it easy to cross.</p> <p>Sheffield stands are present along the route. Signs are clear at the connection to Cycleway 3/Quietway 2.</p> <p>Some trees are present along the route, creating shade for pedestrians.</p> <p>Edgware Road is a busy thoroughfare with an active night life and several night bus routes travelling along this road.</p> <p>The route along Sussex Gardens and Harrowby Street are lined with residential buildings that offer passive surveillance at night.</p>	<p>Pedestrians from all walks of life</p> <p>Things to see and do</p> <p>Easy to cross</p> <p>People feel relaxed</p> <p>Not too noisy</p> <p>Clean air</p>	<p>Improve maintenance of footways.</p> <p>Review location of street furniture to improve footway capacity.</p> <p>Proposed improvement with PGPS:</p> <p>A pedestrian crossing at the junction of Paddington Green and Edgware Road to improve pedestrian infrastructure.</p> <p>On Edgware Road, the development will provide a new piazza with high quality finish, displaying public art, seating area, planters and trees that act as a filter from the traffic and air pollution from Harrow Road and Edgware Road (detailed in Section 3.7.2).</p> <p>The adjacent WEG scheme will be upgrading the bus stop (flag pole) to a bus shelter with real time bus information. This will provide bus passengers with information on how long to wait for the next bus. This is helpful particularly for vulnerable street users at night-time. In addition, a shelter may offer a more controlled passenger waiting environment which may deter some petty crime.</p>

4.3.3 Route 3 – Towards St Mary’s Gardens

Route 3 is to the west of the site, along Harrow Road or Newcastle Place, towards Paddington Green, Church Yard Walk, and St Mary’s Terrace, as shown in Figure 48.

This route provides access to the immediate local amenities to the west of the site, and there are traffic-free sections through the adjacent parks and green space.

Key photos along the route are shown in Figure 49 and observations and opportunities for improvements are provided in Table 11.

Figure 48: Route 3

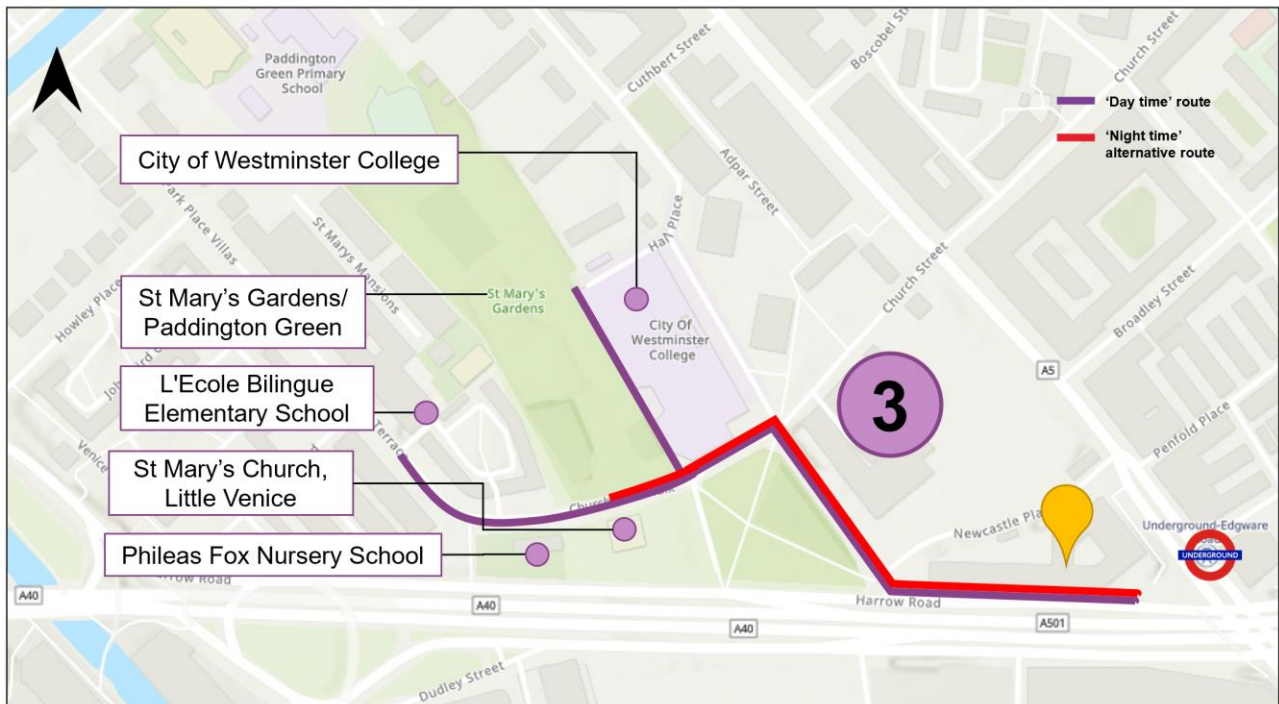


Figure 49: Key photos along Route 3 (towards St. Mary's Gardens)



<p>St Mary's Terrace</p>  <p>Source: Google Streetview</p>	
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Table 11: Route 3 Healthy Streets indicators and opportunities for improvements

Observations	Relevant Healthy Streets Indicators to Consider	Opportunities for the Highway Authority to Improve
<p>Footways provided along Harrow Road and Paddington Green.</p> <p>Bollards are present at access routes between parks.</p> <p>Cycle hire docking station is located at Paddington Green/Harrow Road.</p> <p>Bus stop adjacent to the site on Harrow Road only provides a bus flag, rather than shelter and seating.</p>	<p>Pedestrians from all walks of life</p> <p>Clean air</p> <p>Things to see and do</p> <p>Place to stop and rest</p> <p>Shade and shelter</p> <p>People feel relaxed</p> <p>People feel safe</p> <p>Not too noisy</p>	<p>Provide tactile paving at dropped kerbs, where appropriate, to assist all users.</p> <p>Proposed improvement with PGPS:</p> <p>A pedestrian crossing at the junction of Paddington Green and Edgware Road to improve pedestrian infrastructure.</p> <p>A bus shelter with countdown display will replace the existing bus stop flag on Harrow Road (Stop EX) as part of the proposed development (refer to Figure 31). This will provide bus passengers with information on how long to wait for the next bus. This is helpful particularly for vulnerable street users at night-time.</p> <p>In addition, a shelter may offer a more controlled passenger waiting environment which may deter some petty crime.</p> <p>In addition to the existing highway lighting, the proposals would contribute to lighting - with street lighting from The Boulevard (between Blocks J and K) to create improved look and feel to the street after dark for all pedestrians.</p>

4.3.4 Route 4 – Towards Paddington Station and Sheldon Square

Route 4 is to the south of the site, via the Harrow Road subway, North Wharf Road, a footbridge over Paddington Basin towards the entrance into Paddington Station and St Mary's hospital, as shown in Figure 50.

To reach Paddington Basin / Sheldon Square, an alternative, slightly longer, route has been identified to avoid using the subway to cross Harrow Road which may be perceived as less safe to some street users. The alternative route identified requires site users to cross at Harrow Road at-grade, under the Marylebone Flyover and then follow along the main road (south of Harrow Road). Only a small portion of the route uses via local streets such as North Wharf Road, and Hermitage Street. However, these streets are surrounded by residential developments which provide some passive surveillance during night time.

Key photos along the route are shown in Figure 51 and observations and opportunities for improvements are provided in Table 12.

Figure 50: Route 4

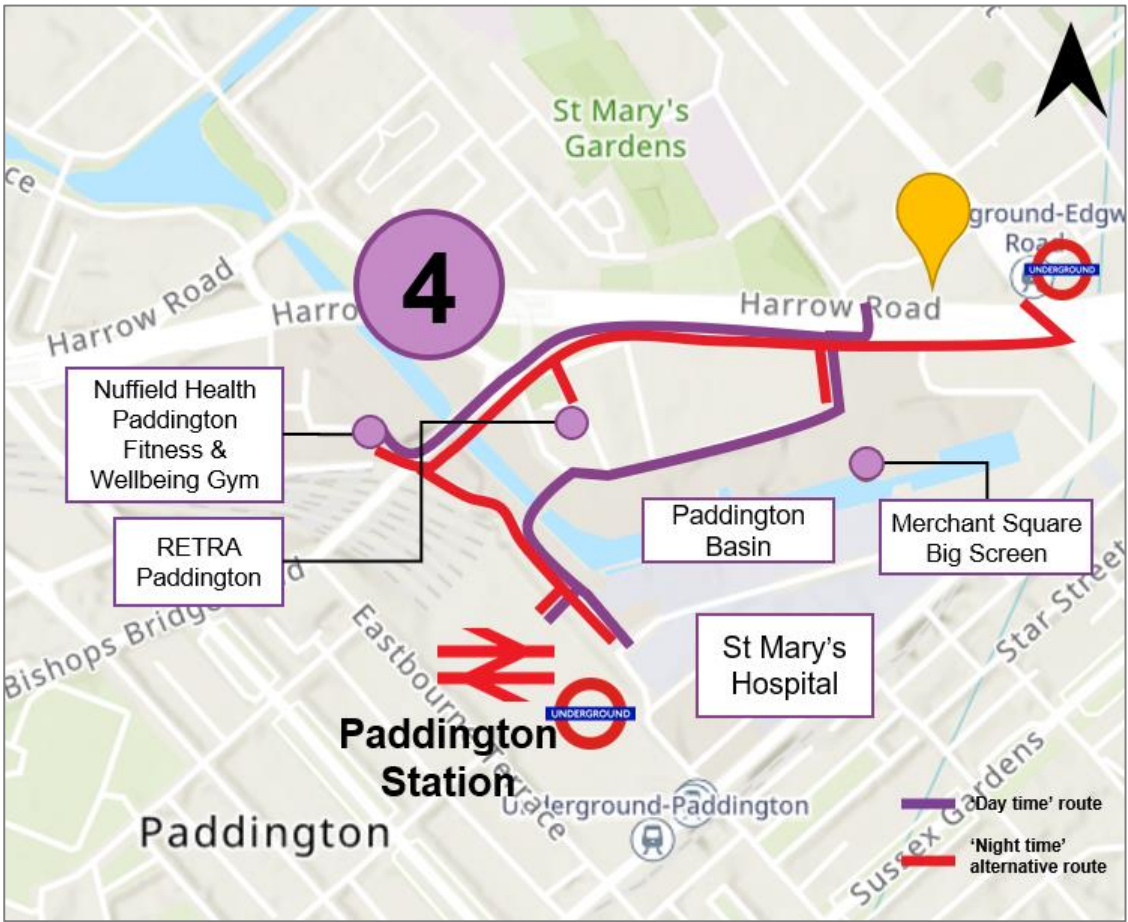




Figure 51: Key photos along Route 4 (towards Paddington Station)

<p>Subway access by the site on the northern side of Harrow Road (day time)</p> 	<p>Subway access via stairs (night time) – stairs are well lit with mirrors providing visibility of the subway</p> 
<p>Harrow Road subway (day time)</p> 	<p>Harrow Road subway (night time) – well lit at night; however graffiti and litter were observed on both sides of the subway</p> 

Subway access at Harrow Road / North Wharf Road (south of Harrow Road)



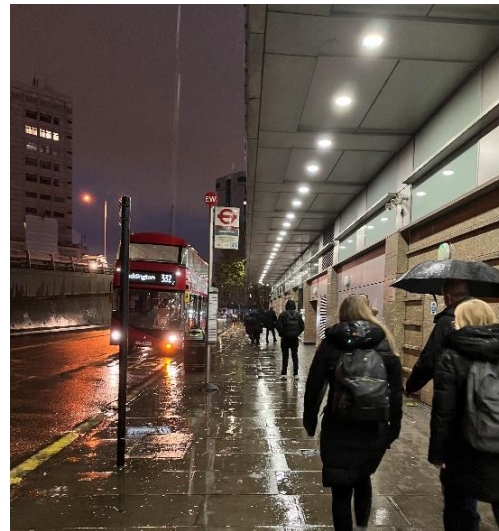
North Wharf Road



Alternative route via Edgware Road / Harrow Road crossing at night – crossing is legible and direct with lighting provision



Alternative route via south of Harrow Road at night (adjacent to Premier Inn hotel) – hotel contributes to street lighting at the bus stop with straight and legible route



Bridge across Paddington Basin (view from south of Basin).



Alternative footbridge to cross Paddington Basin. Cyclists will have to dismount.





<p>Pedestrian path to St Mary's Hospital</p>  <p>Source: Google Streetview</p>	<p>Route to St Mary's Hospital with shared surface.</p> 
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Table 12: Route 4 Healthy Streets indicators and opportunities for improvements

Observations	Relevant Healthy Streets Indicators to Consider	Opportunities for the Highway Authority to Improve
<p>Subway on Harrow Road adjacent to the site is straight with steps and ramp. This provides a traffic-free route to south of Westway. Graffiti and litter were observed at the time of visit on either side of the subway. Should site users wish to use this route at night, the subway provides lighting along the entire section with convex mirrors at both ends providing inter-visibility.</p> <p>Various developments along North Wharf Road are currently under construction. Width and surface quality of footways and carriageway will be improved once construction is complete.</p> <p>Footways along North Wharf Road closer to Paddington Basin are wider and of high quality.</p> <p>Footbridge across Paddington Basin is not step-free.</p> <p>Some parts of the route towards St Mary's Hospital have narrow or no footways and the area act as shared surface.</p>	<p>Pedestrians from all walks of life</p> <p>Not too noisy</p> <p>Things to see and do</p> <p>Place to stop and rest</p> <p>People feel relaxed</p> <p>Easy to cross</p>	<p>Consider providing more rest points and shelters / shading along the route. With the opening of Elizabeth Line, site users are likely to make frequent trips to/from Paddington Station.</p> <p>Proposed improvements with PGPS: The proposed development will contribute to the Subway Improvement Scheme, improvement works could include the overall maintenance of the subway, and removal of graffiti.</p>

4.3.5 Route 5 – Towards Regent's Canal (and Quietway 16)

Route 5 is to the north of the site, along Edgware Road and Frampton Street, as shown in Figure 52. This route is vibrant along Edgware Road and the local shops (including food stores) are expected to meet the day to day needs of residents at the proposed development.

Key photos along the route are shown in Figure 53 and observations and opportunities for improvements are provided in Table 13.

Figure 52: Route 5

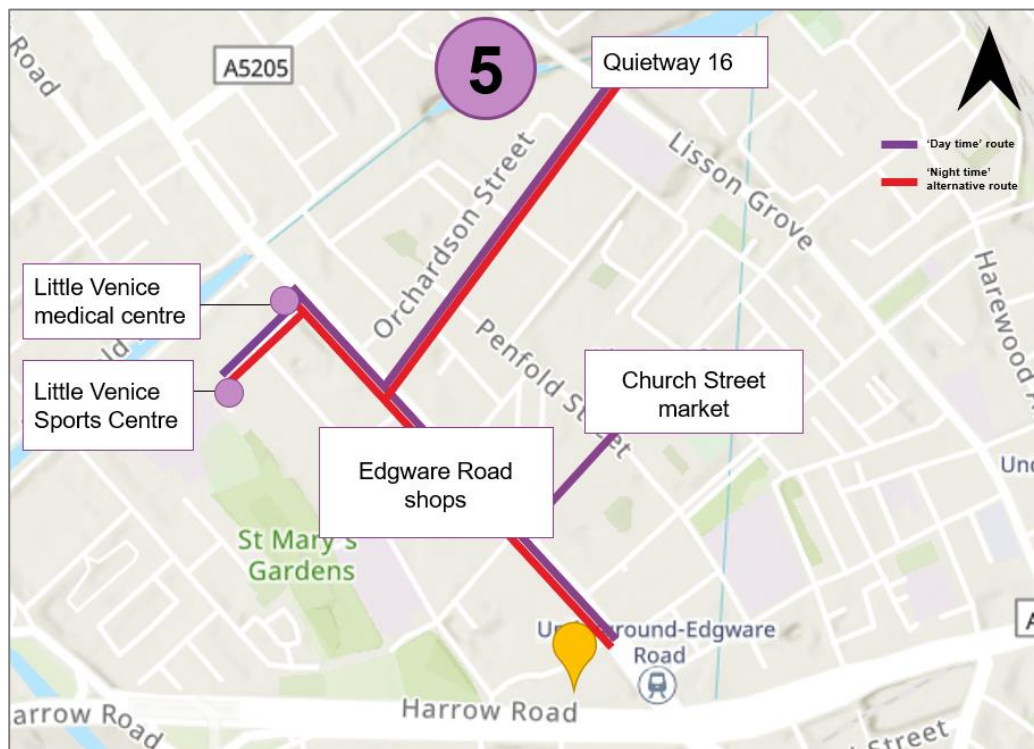
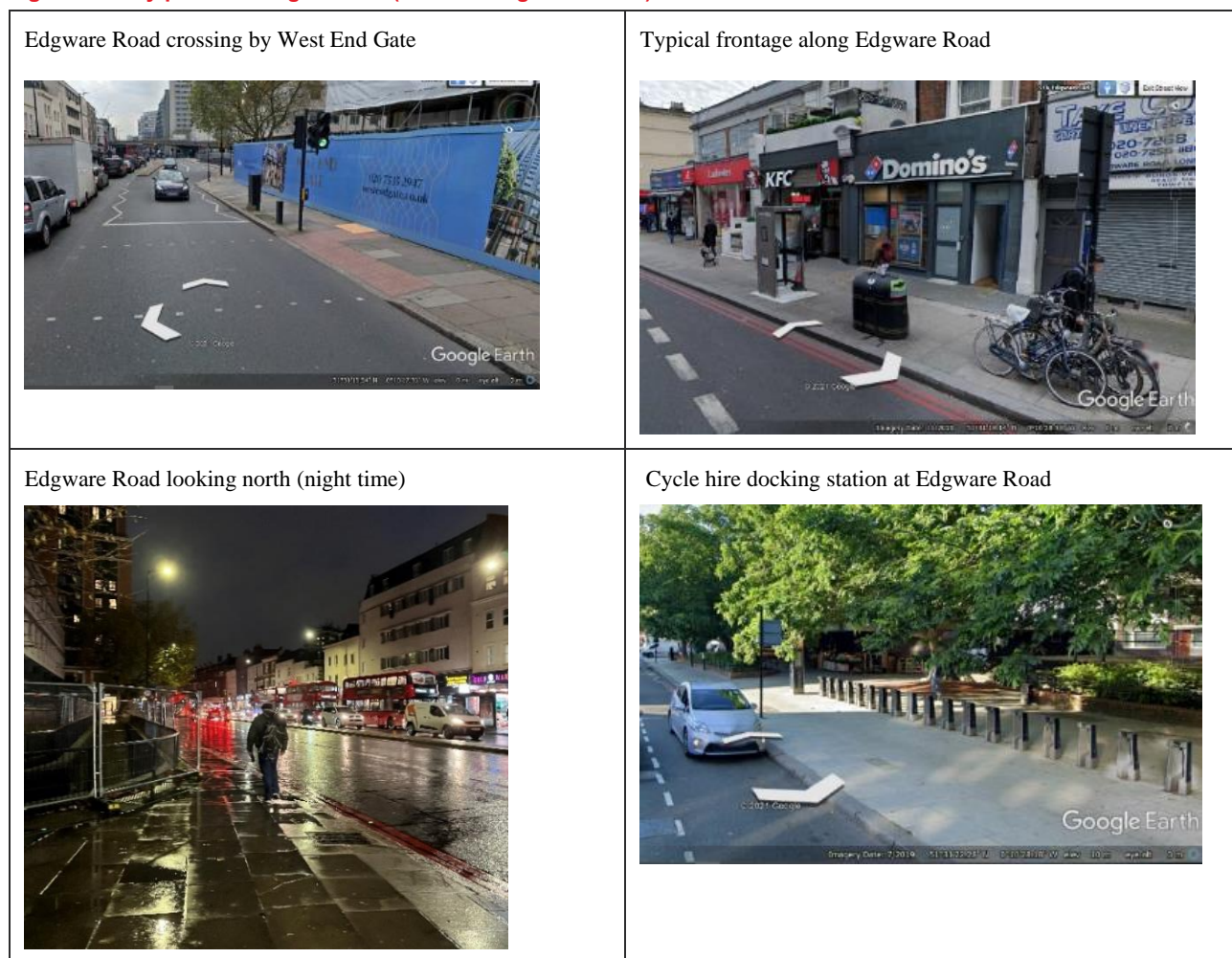


Figure 53: Key photos along Route 5 (towards Regent's Canal)






<p>Frampton Street</p> 	<p>Frampton Street</p> 
<p>Connection to canal path at Frampton Street / Lisson Grove</p>  <p>Source: Google Streetview</p>	

Table 13: Route 5 Healthy Streets indicators and opportunities for improvements

Observation	Healthy Streets Indicator	Opportunities for the Highways Authority to Improve
<p>Footway provided along Edgware Road, with sections of landscaping and trees for shading.</p> <p>Sheffield stands are present along the route. Frampton Street provides Advanced Stop Lines at crossings.</p> <p>Dropped kerbs are provided and tactile paving are present at most, but not all, crossings.</p> <p>Street furniture and bus shelters are aligned which minimises obstruction to pedestrian flows.</p> <p>Pedestrian guard-railing is present near schools.</p> <p>Frequent crossing points along the route.</p>	<p>Pedestrians from all walks of life</p> <p>People feel safe</p> <p>Things to see and do</p> <p>Easy to cross</p>	<p>Provide tactile paving at dropped kerbs, where appropriate, to assist all users</p> <p>Consider providing more rest points along Edgware Road.</p> <p>Proposed improvement with PGPS:</p> <p>On Edgware Road, the development will provide a new piazza with high quality finish, displaying public art, seating area, planters and trees that act as a filter from the traffic and air pollution from the arterial roads (detailed in Section 3.7.2).</p> <p>As discussed, the bus stop will be upgraded to a bus shelter with real time bus information as part of the WEG scheme. This will provide waiting time information for bus passengers which is helpful particularly for vulnerable street users at night-time. In addition, a shelter may offer a more controlled passenger waiting environment which may deter some petty crime.</p>

4.4 Site-specific security measures

4.4.1 Site-specific security measures

The detailed security measures are set out in Berkeley Home's Estate Management Plan. The specific security items are set out below:

- Regular external "security" patrols should be conducted by SIA licensed officers, around and within the development area, and include an immediate security response capability to a security or emergency incident or situation with arrival within a defined time frame.
- The control of access control bollards or other physical barriers to control access of people or vehicles into restricted areas to be undertaken remotely and from the concierge.
- The Playspace area to be monitored by the concierge at all times and security officers will respond to incidents and regularly patrol the area – the Playspace when closed will be secured and visited regularly by security officers
- Planting and landscape will be designed and maintained to minimise their use to enable unlawful or anti-social behaviours – provide hiding places or areas of concealment, and where required hostile planting and physical barriers to be used to create stand-off around private spaces, or critical facilities, or ground floor windows to create defined and defensible space.
- All security and concierge, and other Berkeley Homes on-site staff to be aware, trained and exercised to respond to emergency situations, and where there is a dual role providing security related services they should be SIA accredited for the role they undertake.
- All staff, including sub-contractors where appropriate, have exercise opportunities, and this should be refreshed on a regular basis (at least yearly).

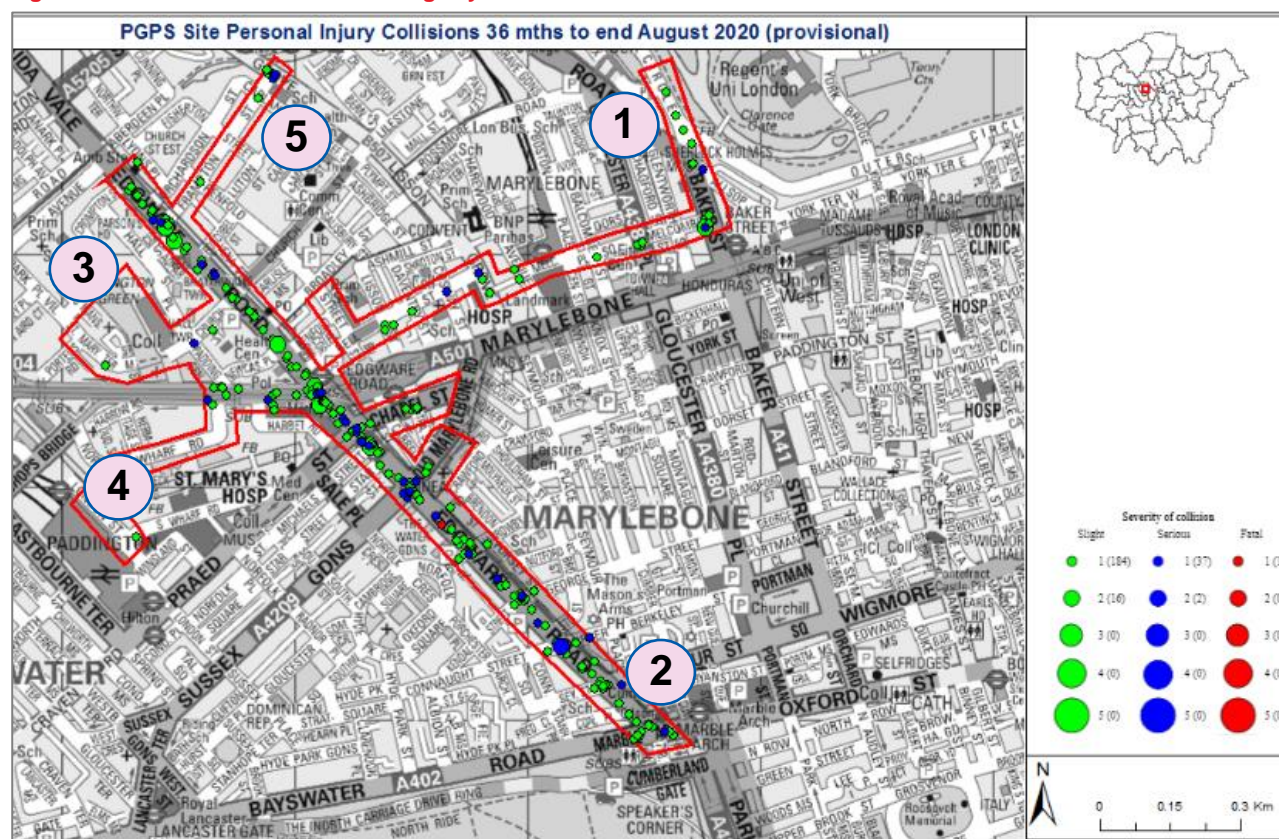
Most of the trip attractors are located immediately off the main streets with regular lighting provision and buildings with active frontages and generally higher footfall that allow for passive surveillance, such as Lisson Grove and Seymour Place, and busy thoroughfares, such as Gloucester Place, facilitating the perception of safer access to these destinations during night-time.

4.5 Vision Zero

The Mayor's Transport Strategy focuses on achieving vision zero objectives which seeks to eliminate all deaths and serious injuries from London's transport network by 2041. As agreed in the pre-application discussion, personal injury collision data has been made obtained from TfL for three years (up to the end of December 2020) within a 500m-radius from the site (see Figure 54).

The data has been analysed to seek to draw out any clusters or patterns, particularly by location or by mode. Serious and fatal incidents have been considered individually. Reflecting TfL's 2041 Vision Zero aspiration, this section identifies where some measures could be considered to reduce the risk of a serious or fatal incident occurring again, or to reduce the risk associated with any identified patterns. The collisions occurred along the identified Key Active Travel Routes (refer to Section 4.3) are analysed in this section.

Figure 54: Locations of collisions along key Active Travel Routes



4.5.1 Study area analysis

The collected data shows that, during this 36-month period, a total of 240 Personal Injury Accidents (PIAs) were recorded within the study area. One collision resulted in a fatality, 39 collisions resulted in serious injuries, and 200 collisions results in slight injuries. The summary of PIAs is presented in Table 14.

Table 14: Summary of PIAs by severity and type of casualty

	Slight	Serious	Fatal
Pedestrians	50	15	1
Vehicles (drivers and/or passengers)	129	11	-
Cyclists	46	13	-

Note: 240 PIAs resulted in a total of 265 injuries.

One fatal PIA occurred within the study area, to the north of the Edgware Road/Burwood Place junction in the evening in October 2019. The pedestrian, was reported to be wearing dark clothes, stepped into the road behind parked cars, both the pedestrian and driver failed to look and vehicle that was turning out of Burwood Place hit the pedestrian.

Within the vicinity of the site, three slight PIAs occurred near the Edgware Road / Newcastle Place junction, they were due to human errors such as failing to look when crossing, masked by stationary vehicles or speeding cars. Two slight PIAs occurred near the Paddington Green / Harrow Road junction. The PIAs were caused by human errors where the parties involved failed to look or judge other vehicle's path.

The recent highways improvements from the Safer Junction scheme discussed in Section 3.4.2.1 is designed to improve safety at the Harrow Road / Edgware Road junction, therefore historic accidents at this location are not analysed.

The majority of the collisions occurred along Edgware Road within the study area (along ATZ Routes 2 and 5). Junctions of Edgware Road with Chapel Street, Old Marylebone Road and Connaught Street recorded more than one occurrence of serious collision. Nine PIAs were related to bus standing/boarding passengers.

Based on Figure 54, some clusters of ‘serious’ PIAs along the Key Active Travel Routes can be identified:

- **Old Marylebone Road / Edgware Road / Sussex Gardens** – Nine serious collisions were reported at this junction. Analysis suggests some collisions were by vehicles/cyclists making either poor turn or illegal turn at this junction.
- **Burwood Place/Edgware Road** – This junction is the connection to cycle Quietway Q2 and where the fatal collision occurred, along with one serious and four slight PIAs. The collisions do not appear to show common PIA causal factors. Only one cyclist was involved in the nine collisions around this junction, but it was due to carelessness of the driver.
- **Frampton Street / Edgware Road** – Three serious collisions were reported at this junction. PIA data suggests collisions were caused by vehicle failing to look / judge path of vehicles/cyclists/pedestrian near this junction.

This section reviews the PIAs that occurred in the past 36 months within the study area. All PIAs were attributed to human error and no highway design issues were identified as causation factors.

Vision Zero Guidance suggests that the TA should identify opportunities for improving highway safety. It should be further noted that WCC has implemented 20mph speed limit across the borough, which should help reduce the number and severity of accidents. In addition, there would be an opportunity to address the instances of human error in relation to making illegal turns whereby additional / re-enforced signage and road markings may assist.

5. London-wide network

This chapter sets out the trip generation assessment of the development and impact assessment for the proposals on the wider public transport and highway networks.

5.1 Trip generation methodology

The proposed trip generation methodology makes reference to the approach used in the 2016 consented WEG application (ref: 16/07226/FULL and 16/11562/FULL for 14-16 Paddington Green) and the latest TRICS data. The trip rates and trip generation methodology have been agreed with TfL as part of the pre-application scoping discussions and confirmed in the post-submissions comments of the April 2021 application.

Multi-modal trip generation is based on 2011 Census travel to work data for residents and staff ('workday population') in Westminster 009 Middle Super Output Areas (MSOA). This is in keeping with the approach in the consented WEG TA. Adjustments are made where appropriate to reflect the car parking provision. It should be noted that using travel to work data can lead to overestimates of public transport trips and underestimates local walking and cycle trips which are associated with other trip purposes, such as education.

The existing site was formerly a police station and would have generated vehicle and person trips. The police station ceased operation in 2018 and a separate change of land use class application has been submitted for the western tower.

A floor area of 1,316 sqm has been consented to change from sui generis use to offices (land use class E). Therefore, the site would have generated trips which would serve to mitigate the demand being forecast for the proposed development. However, for a robust assessment, any trips associated with the existing or consented office use has not been considered in the trip generation.

The trip generation assessment is proposed for the AM peak hour (08:00 to 09:00) and the PM peak hour (18:00 to 19:00).

5.2 Flexible commercial / community

The proposed scheme will provide flexible commercial and community space on the ground floor. Given the high street nature of the local area, these uses are expected to generate pass-by and linked trips and would not be major trip attractors in their own right.

As such, it is proposed that these trips are excluded from the total proposed trip generation. This approach is in line with agreed approach with TfL and WCC during pre-application discussions of the April 2021 application.

5.3 Residential

5.3.1 Person trip rates

For context, the residential person trip rates used in the 2016 WEG TA are shown in Table 15. These were established from Private Flats sites in TRICS.

Table 15: WEG residential person trip rates

	WEG TA		
	In	Out	Total
AM Peak (08:00-09:00)	0.11	0.567	0.677
PM Peak (17:00-18:00)	0.329	0.191	0.520

Given the duration since the preparation of the WEG TA, an updated TRICS site survey interrogation has been undertaken. The approach has been to identify rates for both Private Flats and Affordable Flats. The proposed development is proposed to include 219 (c.39%) affordable homes.

As agreed with TfL during pre-application discussion for the April 2021 application, TRICS sites with a PTAL of 5 to 6b, surveyed in 2015 or later, and located in Inner London have been included. Very small sites with fewer than 20 units have been excluded.

For the affordable flatted sites, only one London survey was undertaken in 2015 (IS-03-D-04). However, TfL suggested to use more than one site to determine the trip rates. A comparison of trip rates between using one site or three sites (including IS-03-D-02 and IS-03-D-03), as presented in Table 16, suggests the average of three identified surveys produces higher peak hour trips. For robustness, this assessment uses three affordable flats surveys to forecast the trip rates and demand.

Table 16: Comparison of trip rates – affordable flats

Time periods	Affordable Flats (three sites)			Affordable Flats (one site)		
	In	Out	Total	In	Out	Total
AM Peak (08:00-09:00)	0.133	0.535	0.668	0.094	0.505	0.598
PM Peak (17:00-18:00)	0.345	0.233	0.578	0.201	0.109	0.309
PM Peak (18:00-19:00)	0.311	0.188	0.499	0.39	0.131	0.521

The TRICS sites selected are set out in Table 17.

Table 17: Selected TRICS residential sites

Reference	Town/City	PTAL	Units
Private Flats			
HM-03-C-02	Sovereign Court, Hammersmith	6b	194
SK-03-C-02	London Square, Bermondsey	6b	29
IS-03-C-07	Canaletto Tower, Islington	5	185
Affordable Flats			
IS-03-D-03	Hume Court, Islington	6a	36
IS-03-D-02	Barnsbury Estate, Islington	5	250
IS-03-D-04	Liverpool Road Estate, Highbury	5	247

Table 18 shows the person trip rates obtained from the TRICS sites for the AM and PM peak hours.

Table 18: TRICS residential person trip rates per unit

	Private Flats			Affordable Flats			Average (61% Private / 39% Affordable)		
	In	Out	Total	In	Out	Total	In	Out	Total
AM Peak (08:00-09:00)	0.088	0.427	0.515	0.133	0.535	0.668	0.105	0.468	0.573
PM Peak (17:00-18:00)	0.179	0.098	0.277	0.345	0.233	0.578	0.242	0.149	0.391
PM Peak (18:00-19:00)	0.434	0.142	0.576	0.311	0.188	0.499	0.387	0.159	0.547

When compared to the WEG person trip rates in Table 15, the latest TRICS sites with a split of 62% private flats and 38% affordable flats generate similar trip rates. It is proposed that the updated TRICS trip rate assessment shown in Table 18 is applied to the proposed scheme. For robustness, the trip rates for 18:00 to 19:00 are used for the PM peak.

5.3.2 Residential mode shares

2011 Census residential travel to work data was used in the WEG TA. This is shown in Table 19. The approach to the proposed car driver mode share for PGPS is as follows:

- The proposed development will support a car-free lifestyle and only 3% disabled car parking (17 spaces for residential) will be provided within the site.
- It is not expected that all disabled car users will travel in the peak hours. For the purposes of the trip generation assessment, it is assumed that around half of the car owners will travel outbound in the peak hour (8 cars) and the car driver mode share has been adjusted accordingly (3%).
- The car driver mode share has otherwise been redistributed to public transport modes.

It should be noted that as set out in Section 3.9.3, there is the potential for the WEG basement to be used for PGPS if required. The number of car parking spaces in WEG and associated vehicle trips are already consented and no net additional car parking are proposed apart from the 3% disabled parking in the PGPS basement.

The adjusted mode share shown in Table 19 provides a combined walking/ cycling/ public transport mode share of 95%, which meets the target mode share for a central London site such as PGPS.

Table 19: Residential population travel to work mode share

Modes	Census mode share	Adjusted mode share
Underground	25%	29%
Rail	6%	7%
Bus	28%	32%
Car Driver	12%	3%
Car Passenger	1%	0%
Taxi	1%	1%
Motorcycle	1%	1%
Cycling	4%	4%
Walking	23%	23%

5.3.3 Multi-modal trip generation

The resulting residential multi-modal trip generation is shown in the following table.

Table 20: Residential multi-modal trip generation

Mode	%	AM Peak (08:00 – 09:00)			PM Peak (18:00 – 19:00)		
		In	Out	Total	In	Out	Total
Underground	29%	17	75	92	62	26	87
Rail	7%	4	17	21	14	6	20
Bus	32%	19	83	102	69	28	97
Car Driver	3%	2	8	10	6	3	9
Car Passenger	0%	0	1	2	1	0	1
Taxi	1%	0	2	2	2	1	2
Motorcycle	1%	1	2	3	2	1	3
Cycling	4%	2	11	13	9	4	12
Walking	23%	14	61	75	50	21	71
Total	100%	59	261	320	214	89	303

The proposed 556 units are forecast to generate 320 trips in the AM peak hour and 303 trips in the PM peak hour. The majority of trips use underground, rail and bus. There are 10 and 9 car trips in the AM and PM peak hours, respectively. It should be noted that Census travel to work mode share has been used but it is expected to overestimate public transport trips and underestimates local walking and cycle trips which are associated with other trip purposes.

It should be noted that a robust assessment has been undertaken and the trip generation assessment does not take into account the current occupation of part of the police building as offices. Therefore, the assessment assumes all the proposed residential trips will be new to the network.

5.4 Delivery and servicing trip generation

The forecast delivery and servicing trips are estimated by using the residential and retail servicing trip rates extracted from the WEG TA. It is expected the small community space will only generate ad-hoc deliveries and have therefore not included in this assessment. The forecast servicing trips by land use are provided in Table 21.

Table 21: Servicing trip rates by land use (vehicles) – per unit, or per 100 sqm

	AM Peak	PM Peak	Daily
Residential	0.004	0.004	0.079
Retail	0.289	0.000	1.375

As the WEG TA servicing trip rates were obtained pre-pandemic, to understand if these servicing trip rates are still applicable in forecasting future servicing demand for the proposed development, a comparison has been made with another similar Berkeley Homes residential-led development. A servicing survey was undertaken at Woodberry Down Estate (Hackney) in October 2021, the vehicular trip rates have been extracted for comparison with the WEG TA trip rates. The peak servicing period was observed to be 20:00-21:00 at Woodberry Down, which is consistent with WEG, for which the former observed 0.032 trips per dwelling and the latter with 0.012 trips per dwelling. A comparison of the network peak hours servicing trip rates is shown in Table 22.

Table 22: Comparison with Woodberry Estate servicing trip rates (vehicles)

	AM Peak	PM Peak	Daily
WEG trip rates	0.004	0.004	0.079
Woodberry Estate surveys	0.002	0.002	0.18
Variance	+0.002	+0.002	-0.721

As shown in Table 22, the Woodberry surveys show higher daily trip rates, but reduction in peak hours trips. In light of the above, whilst the daily trips may be higher, the TA focuses on the peak hour impacts on the surrounding roads, therefore, the WEG trip rates with higher peak hour trip rates remain appropriate to robustly forecast the peak hour service trips of the proposed development.

Table 23: Forecast servicing trips (vehicles)

	AM Peak	PM Peak
Residential	2	2
Retail	3	0
Total	6	2

As shown in Table 23, it is forecast that the site would generate around six delivery vehicles in the AM peak, and two delivery vehicles in the PM peak. Further information on servicing trip generation is contained in the DSP in Appendix D. For a robust case, the servicing trip rates do not include an allowance for potential consolidation of delivery trips with WEG. This would be undertaken by parcel carriers for operational efficiency purposes and would be encouraged as part of the DSP.

5.4.1 Newcastle Place / loop street trip generation

A classified turning counts survey conducted in July 2022 captured 16 vehicles in the AM peak and 25 vehicles in the PM peak travelling along Newcastle Place. These flows included deliveries to WEG and taxi/car drop offs/pick ups for The Westmark. Comparing the numbers with the 2015 survey, when the police station was in operation, Newcastle Place was surveyed to have 9 vehicles in the AM peak and 20 vehicles in the PM peak.

The consented WEG scheme forecast around 7 vehicles in the AM peak and 5 vehicles in the PM peak (including taxis and delivery vehicles). In the peak delivery hours (19:00-21:00), around 10 delivery vehicles could be expected (one vehicle every 6 minutes).

With WEG and the proposed development, there would be around 11 vehicles in AM peak and 9 vehicles in the PM peak. In the peak delivery hours (19:00-21:00), up to 17 delivery vehicles (one vehicle every 3 to 4 minutes) and circa 3 taxis could be expected. This is a robust case and assumes no consolidation in deliveries between WEG and PGPS.

5.4.2 Layby capacity assessment

Laybys along Newcastle Place and the loop street will be used by residential deliveries / drop offs or pick ups only. As there is no change in the number of dwellings (556 no.) or the number of laybys (three no.) as the April 2021 application, the same conclusion on the capacity assessment applies, where the laybys are forecast to provide sufficient capacity to meet the demand. The detailed layby capacity assessment can be referred to in the DSP contained in Appendix D.

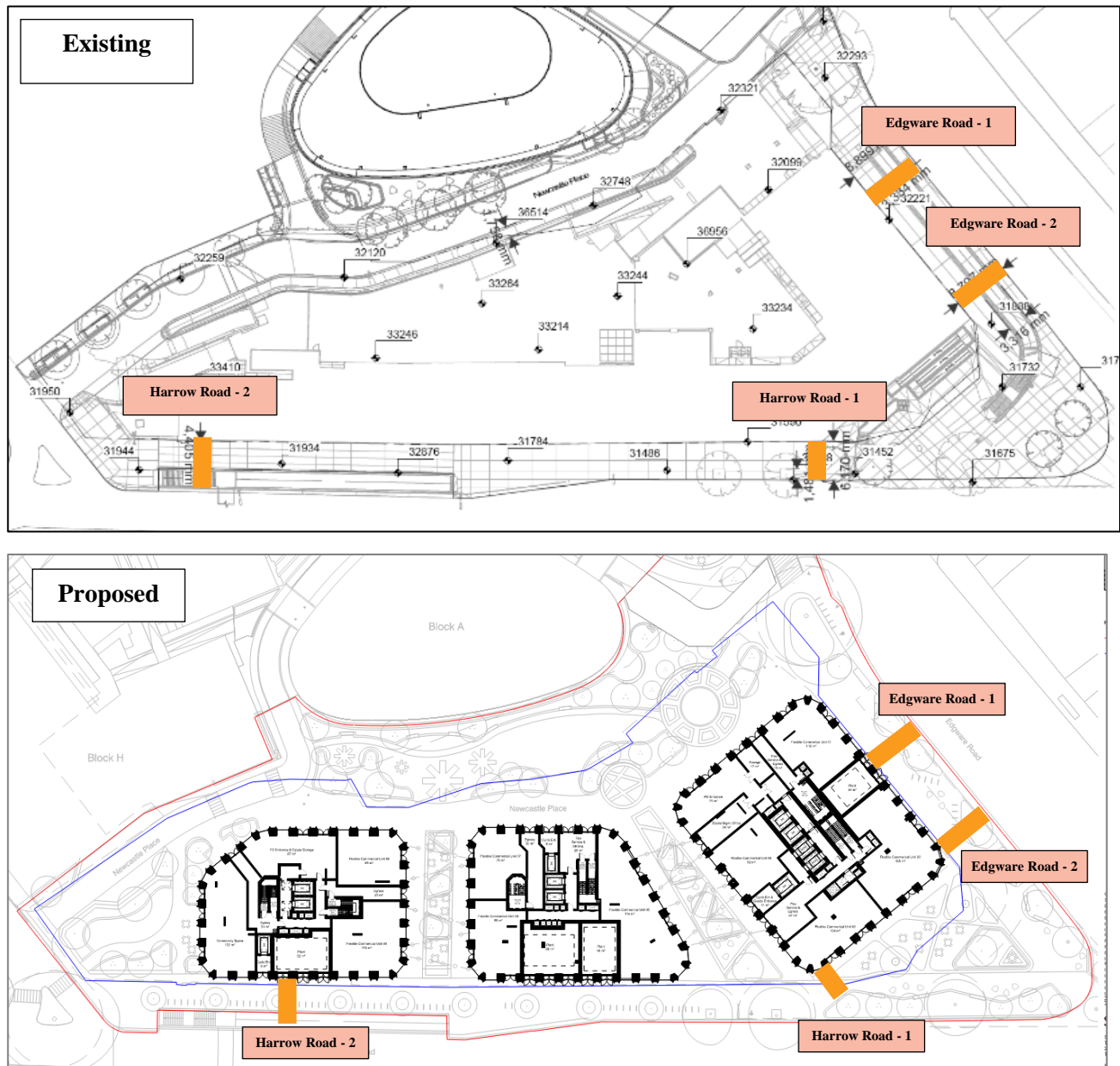
5.5 Pedestrian Comfort Level (PCL) assessment

TfL's pre-application advice on the former application requested for a Pedestrian Comfort Level (PCL) assessment to be undertaken. This section summarises the findings of the PCL assessments, particularly in examining the proposed landscaping improvements along Edgware Road and Harrow Road. The assessment is undertaken in accordance with the TfL Pedestrian Comfort Guidance for London guidance document (2019). The detailed output is presented in Appendix G.

PCLs classify the level of comfort based on level of crowding a pedestrian would experience on the street. A score is given to each link/crossing, with an 'A' classification being the most comfortable and 'E' being the most uncomfortable. A score of 'B' or higher is accepted as a comfortable pedestrian environment.

The PCL assessment focuses on Edgware Road (between Newcastle Place and Harrow Road) and Harrow Road (between Paddington Green and Edgware Road). The PCL points are shown in Figure 55.

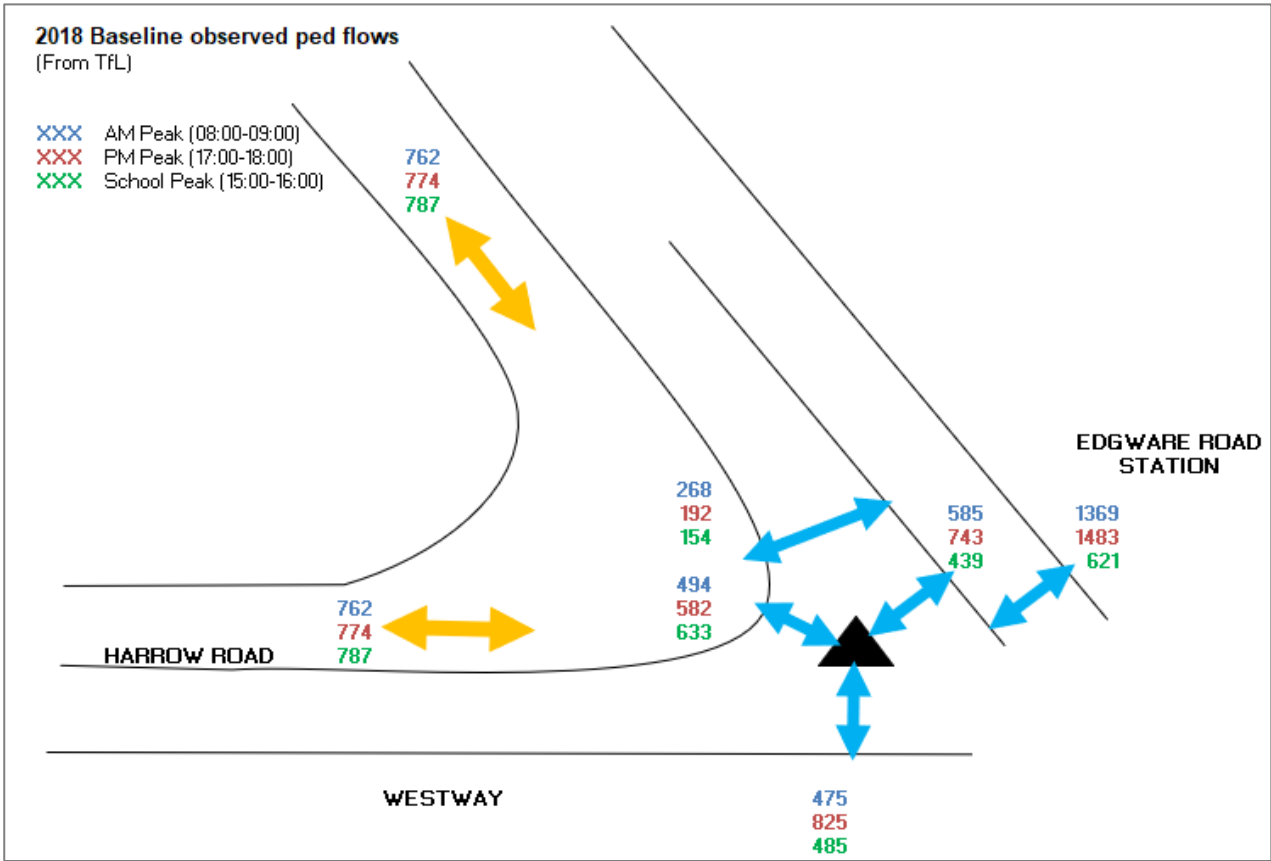
Figure 55: PCL locations (existing and proposed)



Crossing counts at the Edgware Road/Harrow Road junction have been obtained from TfL. The pedestrian count surveys were conducted on 1 November 2018 (Thursday). The observed two-way counts in the AM, and PM peak hours are presented in Figure 56. Following discussions with TfL, the afternoon school peak has also been considered due to the proximity to Westminster College.

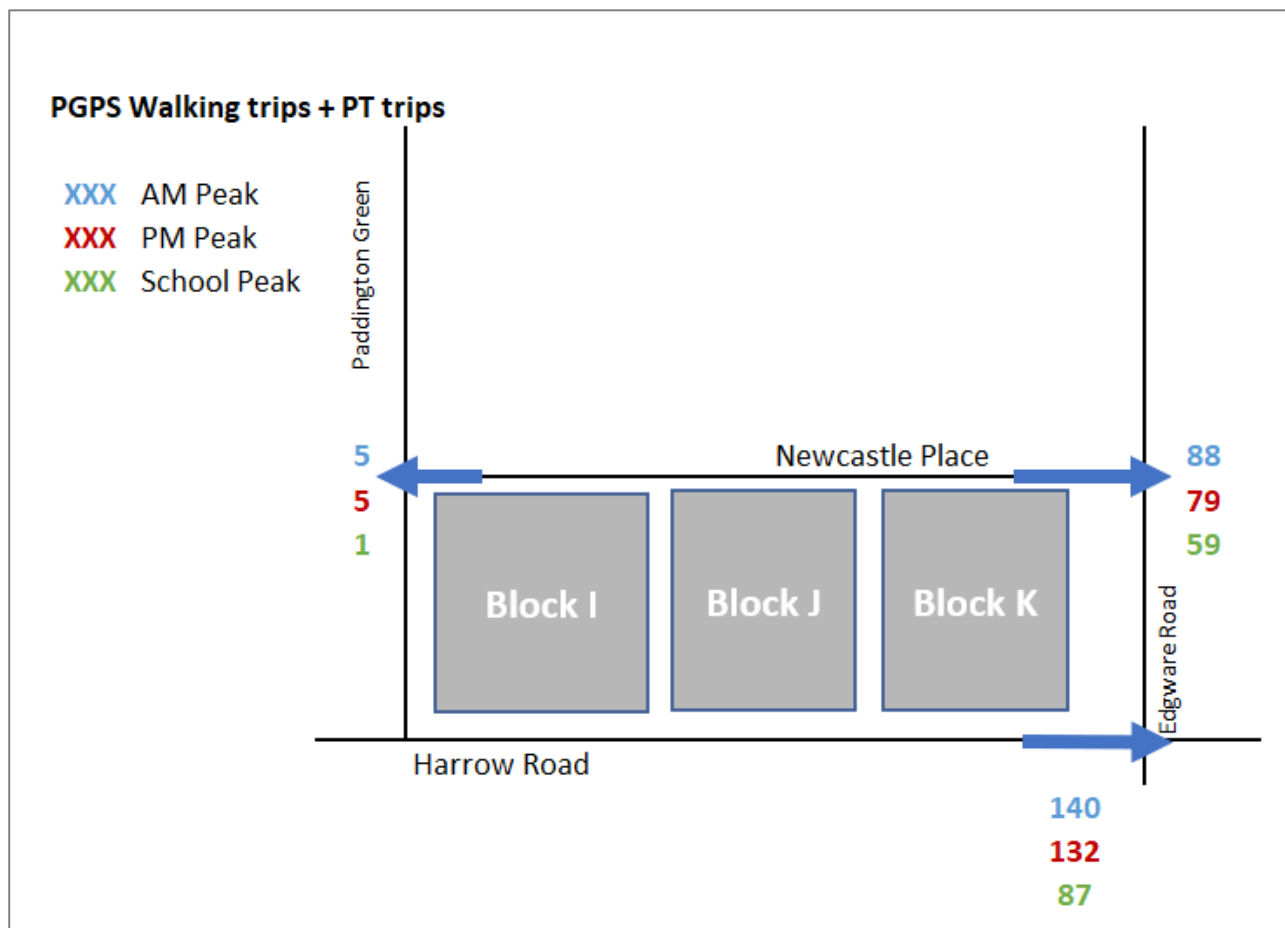
For robustness, it is assumed that all the pedestrians crossing between Harrow Road to Edgware Road (E) are distributed to both Edgware Road (W) and Harrow Road.

Figure 56: Observed baseline (2018) pedestrian flows – Two way



The forecast number of walking trips (including walking to access public transport) for PGPS is illustrated in Figure 57.

Figure 57: Forecast PGPS walking trips on the local network



The pedestrian counts and road widths were input to the TfL PCL assessment calculator, the findings of the PCL assessment for peak hour flows of the baseline and future with development is summarised in Table 24.

Table 24: PCL summary (for peak hour flows) – Baseline and proposed

PCL location	Existing	Future Baseline (with WEG)	Future with proposed scheme (WEG and PGPS)
Harrow Road - 1	A	A	A
Harrow Road - 2	A	A	A
Edgware Road - 1	A	A+	A
Edgware Road - 2	A	A	A

The assessment suggests that the facilities and level of activities in 2018 provide a very comfortable level of service. With the new development, the assessment suggests a negligible change in comfort level. However, the enhanced public realm and pedestrian prioritisation on the assessed links in the future would create a much improved pedestrian environment overall.

The assessment concludes that, in general, the footways available for walking are good and remain comfortable in PCL terms, and there is sufficient space to accommodate pedestrian movements along Harrow Road and Edgware Road. The proposed development will significantly improve the local pedestrian environment.

5.6 Cycle sensitivity

As part of the post-application comments received from TfL on the former application, TfL requested a cycle sensitivity test to be undertaken to reflect the future mode share targets. The assessment is set out in this section.

5.6.1 Cycle sensitivity test

WCC's modal target for cycling in year 2026, similar to open year of 2030, as published in WCC's Cycling Strategy (Nov 2014) is 7% of journeys made by cycle.

A sensitivity I has been undertaken to establish the change in trip forecast should this be achieved for the residential trips, office trips and for the entire site. Trips have been assigned from 'Bus' and 'LUL' to 'Cycling', as of the remaining modes, these trips are most likely to be of similar journey length replaced by cycling.

The TA forecast versus reallocation is summarised by the following tables, suggesting that the uptake to the level of cycling in WCC Cycling Strategy (2014) would not have significant impact on the conclusions of the Transport Assessment.

- Change in cycle trips from the forecast shown in Table 20: +9 trips (refer to Table 26)
- Change in bus and LUL trips from the forecast shown in Table 20: -9 trips (refer to Table 26)

The detailed calculations are presented below, where,

- Table 25 (Scenario 1) shows the trips with an adjusted Census 2011 car mode share to public transport + taxi + moped + passengers, and
- Table 26 (Scenario 2) shows the trips with an adjusted cycle mode split from Scenario 1 to match WCC cycle targets (7%).

Table 25: Cycle sensitivity – Scenario 1

Mode	%	AM Peak			PM Peak		
		In	Out	Total	In	Out	Total
LUL	29%	17	75	92	62	26	87
Rail	7%	4	17	21	14	6	20
Bus	32%	19	83	102	69	28	97
Taxi	1%	0	2	2	2	1	2
Motorcycle	1%	1	2	3	2	1	3
Car Driver	3%	2	8	10	6	3	9
Car Passenger	0%	0	1	2	1	0	1
Cycling	4%	2	11	13	9	4	12
Walking	23%	14	61	75	50	21	71
Total	100%	59	261	320	214	89	303

Table 26: Cycle sensitivity – Scenario 2

Mode	%	AM Peak			PM Peak		
		In	Out	Total	In	Out	Total
LUL	27%	16	71	88	59	24	83
Rail	7%	4	17	21	14	6	20
Bus	30%	18	80	97	65	27	92
Taxi	1%	0	2	2	2	1	2
Motorcycle	1%	1	2	3	2	1	3
Car Driver	3%	2	8	10	6	3	9
Car Passenger	1%	0	1	2	1	0	2
Cycling	7%	4	18	22	15	6	21
Walking	23%	14	61	75	50	21	71
Total	100%	59	261	320	214	89	303

5.7 Cycle hire

TfL provided the capacity and utilisation of some of the cycle hire stations in the vicinity of the site. However, in terms of the nearest docking stations, the data was limited to only Paddington Green (20 docks). The data showed 14% empty minutes and 0.2% full minutes. The data suggests that the Paddington Green docking station is not empty for a significant amount of time, and it is rarely full.

The data does not include utilisation of the larger provision at Edgware Road Station and any increase in local demand arising from the proposed development is expected to be distributed across both Paddington Green and Edgware Road docking stations given the similar distances to the site. Cycle parking demand arising from the proposed development will also be met by the provision of short stay cycle parking in convenient and visible locations, and long stay cycle parking for residents and staff. Furthermore, the proposed development will have a mixture of uses, attracting cycle trips to and from the site which would help balance the use of the docking stations. Therefore, it is not considered that there will be a significant impact on the existing operation of the nearby docking stations near the site.

5.8 Public transport network capacity

This section provides a public transport capacity assessment of the proposed scheme. The assessment is based on the allocation of trips onto individual lines and services, the frequencies of the public transport services and the number of proposed trips per service. TfL's NUMBAT database has been interrogated to obtain the data for public transport network capacity assessment. The following 2019 NUMBAT data (Monday to Thursday) was used:

- Link frequencies
- Link load
- Link boarders
- Station flows

5.8.1 London Underground assessment

Edgware Road Underground stations (Bakerloo Line station, and Hammersmith & City, Circle and District Lines station) are the nearest to the development. The other Underground stations within walking distance are served by the same lines as Edgware Road. Therefore, all London Underground trips are expected to use the two Edgware Road stations.

The proposed development is expected to generate 41 trips and 39 trips on the Underground network in the AM peak and PM peak hours, respectively.

Census journey to work and location of usual residence data was interrogated for office trips and residential trips, respectively. The distribution of trips on LUL is summarised in Table 27.

Table 27: Distribution of trips (%) by LUL and direction

LU lines	Direction	Journeys to Work (from Edgware Road LU)	Journeys to Work (to Edgware Road LU)
Bakerloo	NB	8%	68%
	SB	68%	12%
H&C	EB	1%	0%
	WB	8%	12%
Circle	EB	-	2%
	WB	6%	-
District	EB	-	6%
	WB	9%	-
Total		100%	100%

The forecast PGPS trips generated by LUL are distributed across the services by branch, based on directional percentages to/from the site shown Table 27. The forecast demand on each line and branch is shown in Table 28.

Table 28: Forecast PGPS trip distribution on LUL

LU Lines	Branch	AM Peak			PM Peak		
		In	Out	Total	In	Out	Total
Bakerloo	NB	1	6	7	5	2	7
	SB	11	51	62	42	17	59
H&C and Circle	EB	0	1	1	1	0	1
	WB	0	1	1	1	1	2
Circle	WB	2	9	11	7	3	11
District	WB	2	7	8	6	2	8
Total		17	75	92	61	25	87

Link loading capacity

Link loading data at Edgware Road station is obtained from TfL's NUMBAT database. The link loading data shows the number of passengers travelling along a link between one station and another in 15-minute intervals. The existing outboard and inbound trips are shown in Table 29.

Table 29: Existing (2019) link loading on Edgware Road LUL

LU Line	Branch*	From Edgware Road		To Edgware Road	
		AM Peak	PM Peak^	AM Peak	PM Peak^
Bakerloo	NB	5,878	8,191	9,901	6,452
	SB	10,213	7,730	7,056	8,465
H&C and Circle	WB	4,183	6,118	7,083	4,834
	EB	7,112	5,755	4,960	6,545
District	WB	406	741	625	437

* Branch of the line from Edgware Road station

^ PM Peak Hour = network peak hour (17:00-18:00)

The train planning capacity of the different LUL at Edgware Road stations is presented in Table 30 based on rolling stock information.

Table 30: LUL train planning capacity by direction

	Max capacity*	Frequency per direction	LUL capacity (pphd)
Bakerloo line (NB)	583	21	12243
Bakerloo line (SB)	583	23	13409
H&C and Circle (EB)	789	13	10257
H&C and Circle (WB)	789	18	14202
District (WB)	789	6	4734

* Maximum observed standing capacity (5 customers per sqm)

As the District Line and one branch of the Circle line terminates at Edgware Road, there is no eastbound services for these lines. Therefore, for the purposes of this assessment, the westbound services for H&C, Circle and District Lines are assessed together. The ratio of demand of the proposed development trips on LUL capacity is shown in Table 31.

Table 31: LUL network demand assessment

	LUL capacity (pphd)	PGPS only				Ratio of PGPS Demand to Capacity			
		AM		PM		AM		PM	
		In	Out	In	Out	In	Out	In	Out
Bakerloo line (north)	12243	1	6	5	2	0.01%	0.05%	0.04%	0.02%
Bakerloo line (south)	13409	11	51	42	17	0.09%	0.38%	0.31%	0.13%
H&C and Circle (east)	10257	0	1	1	0	0.00%	0.01%	0.01%	0.00%
H&C and Circle and District (west)	18936	4	17	34	6	0.02%	0.09%	0.07%	0.03%

The above table shows that the proposed development will have a negligible demand on the LUL network capacity.

A cumulative assessment has been undertaken on the total ratio of existing and future demand on capacity. The future baseline includes the committed WEG LUL trips. This assessment has been undertaken for the AM peak as this has the highest proposed trip generation and link loading. Table 32 and Table 33 presents the results at the two Edgware Road stations.

Table 32: Ratio of demand to capacity on Bakerloo Line (AM Peak)

	LUL capacity (pphd)	Baseline flows 2019	Ratio of demand to capacity	Proposed PGPS LUL trips	Future Baseline (+WEG) + PGPS	Ratio to Demand capacity	Cumulative % Difference
Bakerloo line (to north)	12,243	5,878	48.0%	6	5,890	48.1%	0.10%
Bakerloo line (from north)	12,243	9,901	80.9%	1	9,903	80.9%	0.02%
Bakerloo line (to south)	13,409	10,213	76.2%	51	10,319	77.0%	0.79%
Bakerloo line (from south)	13,409	7,056	52.6%	11	7,078	52.8%	0.17%

Table 33: Ratio of demand to capacity on H&C, Circle and District Lines (AM Peak)

	LUL capacity (pphd)	Baseline flows 2019	Ratio of demand to capacity	Proposed PGPS LUL trips	Future Baseline (+WEG) + PGPS	Ratio to Demand capacity	Cumulative % Difference
H&C and Circle (to east)	10,257	7,112	69.3%	1	7,126	69.5%	0.14%
H&C and Circle (from east)	10,257	4,960	48.4%	0	4,962	48.4%	0.02%
H&C, Circle and District (to west)	18,936	4,589	24.2%	17	4,627	24.4%	0.20%
H&C, Circle and District (from west)	18,936	7,518	39.7%	4	7,525	39.7%	0.04%

Table 32 and Table 33 show there is currently existing spare capacity on all the existing LUL at Edgware Road. The busiest line is Bakerloo from the north, with a ratio of demand to capacity of around 80%.

The highest forecast cumulative increase in ratio of flow to capacity is 0.8% on the Bakerloo line to the south. This is a negligible change in passenger levels and a reasonable ratio of demand to capacity (77%) can still be achieved.

Gateline demand and capacity

TfL's pre-application advice requested an assessment on gateline capacity. The gateline information at the two Edgware Road stations from 2019 are shown in Table 34.

Table 34: 2019 Gateline data at Edgware Road Stations – average weekday

Stations	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	In	Out	Total	In	Out	Total
Edgware Road (District)	907	1715	2622	1811	854	2665
Edgware Road (Bakerloo)	416	1297	1713	1519	462	1981

The proposed trip distribution to the two Edgware Road stations is shown in Table 35. The percentage increase is shown in Table 36.

Table 35: Gateline demand – Proposed development (PGPS)

Stations	AM Peak			PM Peak		
	In	Out	Tot	In	Out	Tot
Edgware Road (District)	4	18	22	15	6	21
Edgware Road (Bakerloo)	13	57	69	47	19	66

Table 36: Percentage change in gateline demand at Edgware Road Station

Stations	AM Peak			PM Peak		
	In	Out	Tot	In	Out	Tot
Edgware Road (District)	0.5%	1.1%	0.9%	0.8%	0.7%	0.8%
Edgware Road (Bakerloo)	3.1%	4.4%	4.1%	3.1%	4.2%	3.3%

As shown, the proposed development will account for approximately 1% increase in gateline demand at Edgware Road station (District) and approximately 4% increase at Edgware Road station (Bakerloo).

An assessment has been undertaken on the gateline capacity:

- Edgware Road (H&C, Circle and District) Station has seven standard gates and two wide gates. The cumulative demand (existing demand plus WEG and PGPS) requires five gates in both the AM and PM peak periods.
- Edgware Road (Bakerloo) Station has four gates. The cumulative demand (existing demand plus WEG and PGPS) requires four gates in both the AM and PM peak periods.
- This shows that there is currently a sufficient number of gates at both stations to accommodate demand and no additional gates are required.

5.8.2 Bus network assessment

The proposed development is forecast to generate up to 45 trips and 43 trips in the AM and PM peak hour, respectively. As discussed in Section 3.3.2, there are 91 services in the vicinity of the site in the peak hour.

The bus trips generated by the site is around one additional passenger per bus and this is considered to be a negligible impact to the capacity of the bus services. A high-level assessment has been undertaken on the general direction of bus trips and the associated bus routes. This is shown in Table 37.

Table 37: Bus trips by direction and bus route

Direction	%	Bus routes	Freq.	AM Peak			PM Peak		
				In	Out	Total	In	Out	Total
North	25%	6, 16, 98, 332, 414	42	5	21	26	17	7	24
East	11%	18, 27, 205	23	2	9	11	8	3	11
South	55%	6, 7, 16, 23, 27, 36, 98, 205, 414	78	10	46	56	38	16	53
West	9%	7, 18, 23, 36, 332	39	2	8	9	6	3	9
Total	100%	-	182	19	83	102	69	28	97

5.9 Highway network capacity

The proposed development is expected to generate the following vehicle trips:

- 10 and 9 two-way car trips in the AM and PM peak, respectively. These will access the basement via Church Street.
- Two two-way taxi trips in both peak hours. These will access from the Newcastle Place / Edgware Road junction onto the loop street.
- Six delivery vehicles in the AM peak and two vehicles in the PM peak. The residential deliveries will access Newcastle Place / the loop road and the commercial deliveries will take place in the basement via Church Street.

These trips have been distributed onto the local highway network, taking into account one-way streets and restricted turns. Figure 58 and Figure 59 show the proposed scheme vehicle trips in the AM and PM peak hours.

Figure 58: Proposed vehicle trips in the AM peak

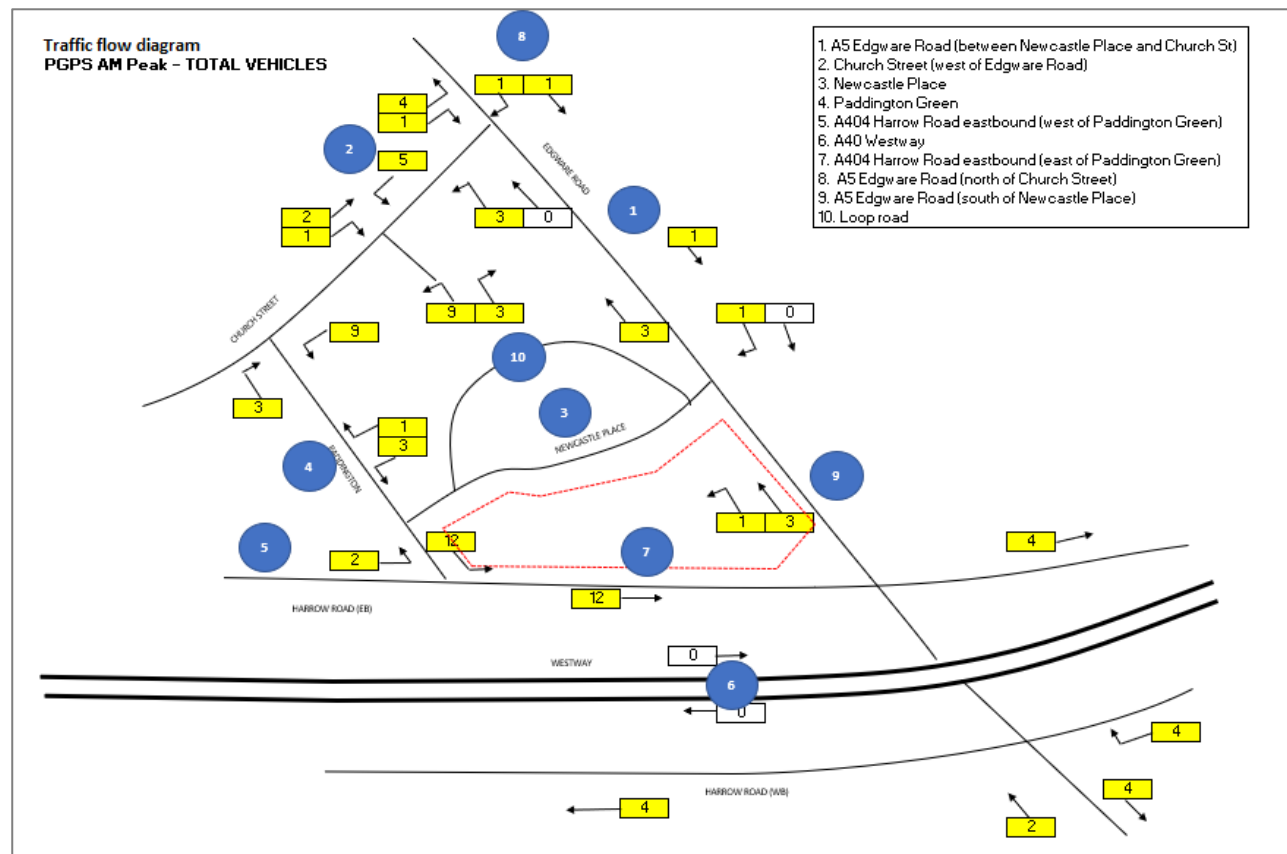
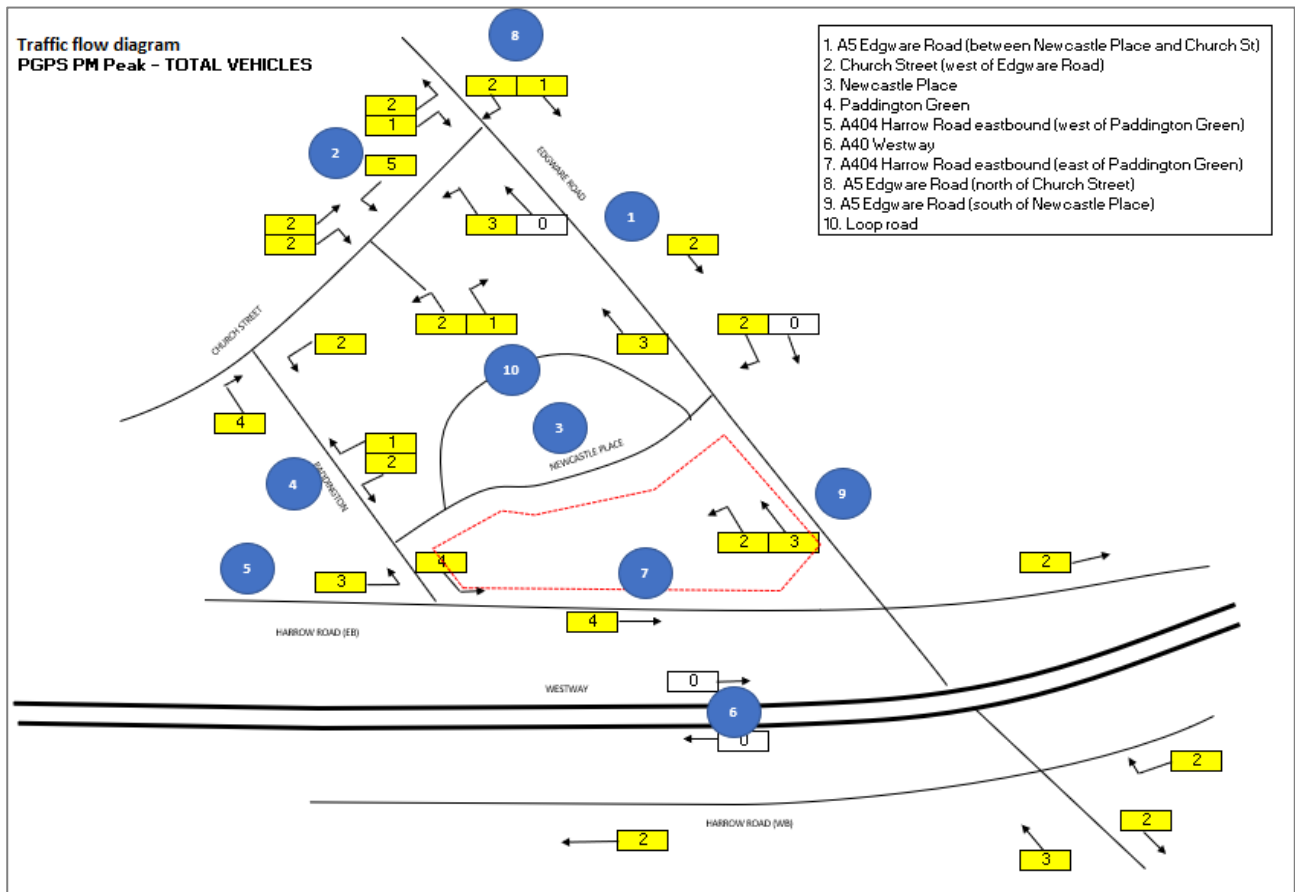


Figure 59: Proposed vehicle trips in the PM peak



In the AM peak, the proposed vehicle trips by street:

- Church Street: 12 vehicles to the west and 10 vehicles to the east of basement access.
- Newcastle Place / loop street: 4 vehicle trips.
- Paddington Green (south of Newcastle Place): 14 vehicle trips
- Edgware Road: 4 vehicle trips
- Harrow Road: 12 vehicle trips

In the PM peak, the proposed vehicle trips by street:

- Church Street: 6 vehicles to the west and 6 vehicles to the east of basement access.
- Newcastle Place / loop street: 3 vehicle trips
- Paddington Green (south of Newcastle Place): 7 vehicle trips
- Edgware Road: 5 vehicle trips
- Harrow Road: 4 vehicle trips

The assessment shows that the proposed development will result in a negligible amount of additional vehicles on the local streets. The highest increase is 14 vehicle trips on Paddington Green, south of Newcastle Place. This equates to, on average, one vehicle every four minutes which would result in an imperceptible change. Therefore, the proposed development is not expected to have an impact on the capacity of the highway network.

6. Construction

6.1 Introduction

Berkeley Homes have provided information on the proposed construction strategy, which has informed the Outline Construction and Logistics Plan (CLP) contained in Appendix C.

This chapter sets out a summary of the construction proposals.

6.2 Construction programme and phasing

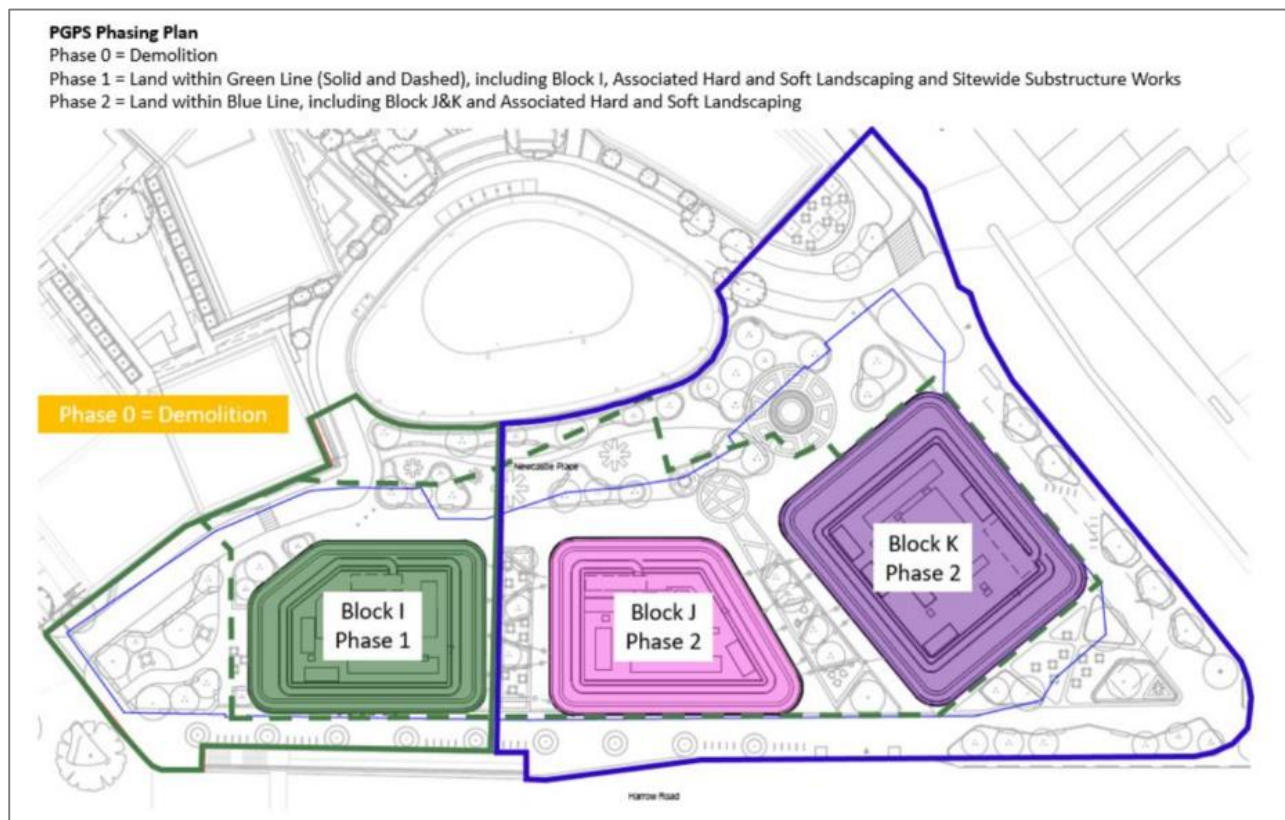
The project will commence with the demolition stage, as a 'phase 0'. The development will then be delivered in two further phases of development, namely the delivery of Block I, associated hard and soft landscaping and site wide substructure work as Phase 1, and then Block J and Block K as Phase 2. The construction programme is presented in Table 38.

Table 38: Indicative construction programme

Phase	Duration (months)	Start Date	Completion Date
Enabling, Demolition and Clearance Works	13	Q3 2023	Q3 2024
Substructure Works	20	Q3 2024	Q2 2026
Superstructure Works: Block I	15	Q2 2025	Q3 2026
Superstructure Works: Block K and Block J	32	Q2 2026	Q3 2028
Envelope Works: Block I	17	Q3 2025	Q1 2027
Envelope Works: Block K and Block J	32	Q4 2026	Q3 2029
Fit Out Works: Block I	20	Q3 2026	Q2 2028
Fit Out Works: Block K and Block J	33	Q3 2027	Q3 2030
External Works and Landscaping: Block I	6	Q4 2027	Q2 2028
External Works and Landscaping: Block K and Block J	36	Q1 2027	Q3 2030

The phasing plan is shown in Figure 60.

Figure 60: Phasing plan



6.3 Construction hours

Working hours would be agreed with WCC, but are expected to be:

- 08:00 to 18:00 hours Monday to Friday.
- 08:00 to 13:00 hours Saturday.
- No working on Sundays or Bank Holidays.

All work which is intended outside of these hours, excluding emergencies, would be subject to prior agreement, and / or reasonable notice to WCC.

6.4 Construction access

Construction access has been considered in detail in terms of minimising impact on local streets, and taking into account junctions with banned turns and restricted space for manoeuvring large vehicles. Further discussions on the construction access strategy will take place with local authorities prior to and during the construction process.

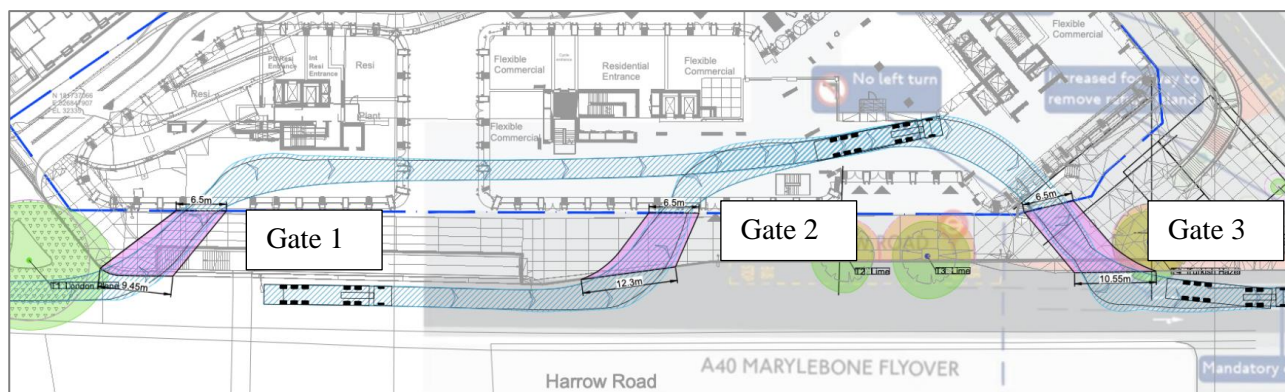
The site is well located to the strategic highway network and for the duration of the construction period, direct access from the A404 Harrow Road is proposed. Three locations for construction site vehicular gates have been identified and it is proposed that up to two gates will be operational at any one time. The gates will be marshalled to minimise risks of conflicts with pedestrians. The locations of the gates are shown in Figure 61. A summary of the indicative phasing of access and gates are as follows:

- **Initial Demolition Access** – Access has to be gained from Edgware Road to commence demolition from the existing PGPS courtyard. Access would be kept to a minimum and limited to 7.5t vehicles. It is anticipated that the number of vehicles turning into Newcastle Place would be approximately 30 vehicles a day for this phase. Traffic marshals will be present to manage the traffic and the turning movements to Newcastle Place.

As set out in the CLP guidance issued by TfL, it is the intention to use the adjacent WEG construction site to provide access for large plant for the initial stage of the demolition.

- **Demolition and Enabling Works** – Gate 2 on Harrow Road.
- **Excavation** – Gates 2 and 3 on Harrow Road.
- **Construction of Block I** – Gates 1 and 3 on Harrow Road.
- **Construction of Blocks J and K** – Gates 2 and 3 on Harrow Road.

Figure 61: Location of Gates 1 to 3



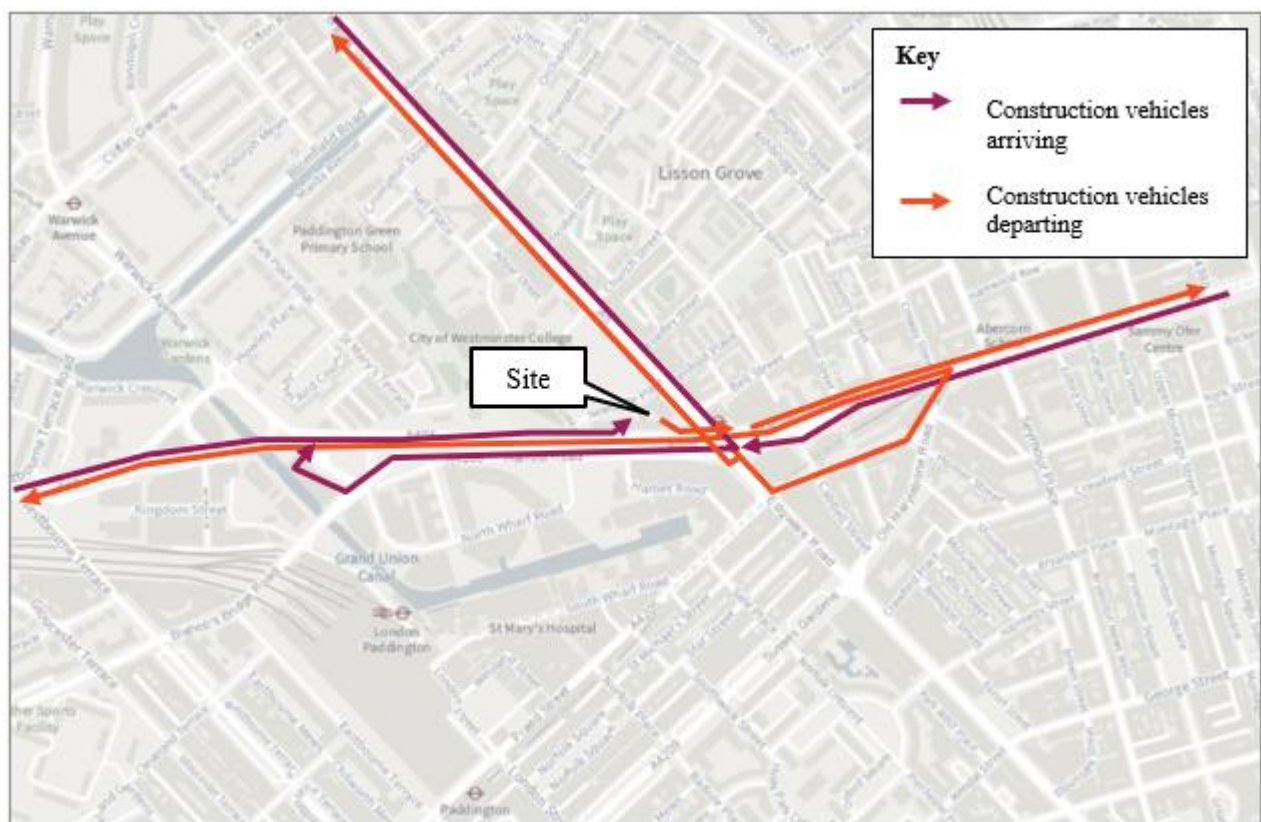
The locations of the gates aim to maximise stacking capacity within the site and minimise any potential risk of queuing on the public highway. The details of the construction logistics strategy is set out in the Outline CLP contained in Appendix C.

Hoarding will be provided along Harrow Road to maintain a 2.5m footway. Gate 1 by Paddington Green will require the temporary closure of the stairs to the underpass. However, the step-free ramp will remain open and pedestrian diversion signs will be provided. The locations of the gates do not affect the operation of the bus stops along Harrow Road, or the Harrow Road / Edgware Road junction.

6.5 Indicative construction routes

In line with TfL's Construction Logistics Plan guidance, construction routes will be routed along the Strategic Road Network (SRN) and the Transport for London's Road Network (TLRN) as they are best suited to heavy traffic, and less likely to create congestion which in turn could minimise impacts on local air quality. The indicative construction routing is shown in Figure 62.

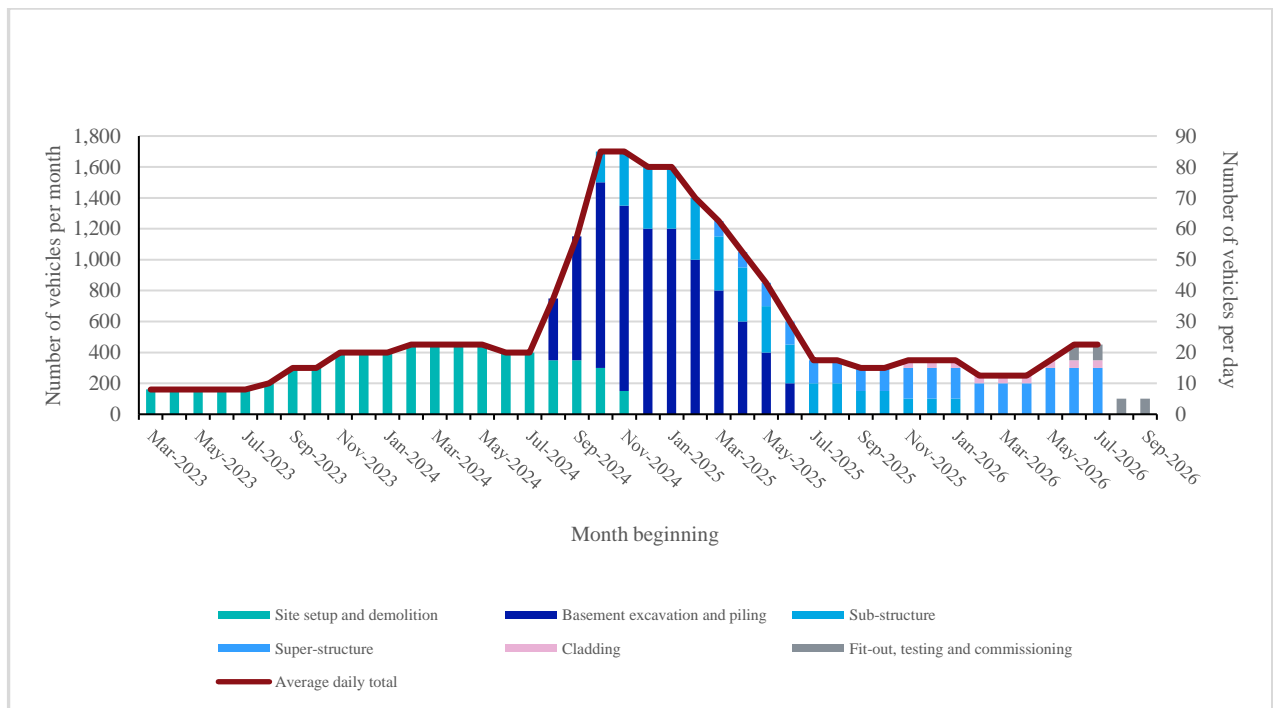
Figure 62: Indicative construction vehicular routing



6.6 Construction traffic movements

The estimated monthly total number of construction vehicles from 2023 to 2030 are provided in Figure 63.

Figure 63: Indicative number of construction vehicles



The highest number of vehicles in one day is expected to be 85 during the demolition, excavation and piling phases. This equates to around 8 to 9 vehicles an hour when considered over a 10-hour working day. This level of vehicle movement is not expected to have a perceptible impact on the highway network. Measures to minimise the impact of construction are set out in the Outline CLP contained in Appendix C.

7. Summary and conclusions

The proposal is to redevelop the police station and deliver 556 residential homes, flexible commercial space (non-office) and community space. The development will provide basement car and cycle parking and the scheme involves closing off Newcastle Place to general vehicular access to deliver a high-quality public realm between the development and the WEG to the north.

In accordance with TfL's Healthy Streets TA guidance, a summary table is provided below which sets out the key transport impacts and issues, and the proposed solutions and mechanisms.

The proposed development is in keeping with the TfL Healthy Streets agenda and will significantly improve the public realm in the surrounding area. The development is considered to be policy compliant and will have minimal impact on the local transport network, therefore it should be supported by WCC and TfL.

Table 39: TA summary table

	Key transport impacts / issues	Solutions / mechanisms
Site and surroundings	<p>The site is located on the corner of Edgware Road and Harrow Road, bounded by Paddington Green to the west and Newcastle Place to the north. It has a PTAL of 6b and is easily accessible by walking, cycling and public transport.</p>	<p>Public realm improvements form part of the design, including significant enhancements along Newcastle Place, Edgware Road, and Harrow Road.</p> <p>Residential access to the development will be from Newcastle Place and Harrow Road. There will be active frontages along Harrow Road and Edgware Road will access points to the flexible commercial units.</p> <p>Short stay cycle parking will be provided in the public realm and long stay cycle parking will be located in the B1 basement with step-free access provided.</p> <p>All delivery and servicing activity will take place within the site, using loading bays in the basement or on the ground floor (via the loop road or Newcastle Place) which are seamlessly integrated into the public realm.</p>
Active Travel Zone (ATZ)	<p>There are a number of key destinations within a 20-minute cycle distance of the site. When assessing the ATZ routes, extra considerations have been given to the social-economic background of the local neighbourhoods and the issues on crime and security in the locality.</p> <p>The identified routes highlight how well connected the site is to the public transport network and local amenities including places of worship and cultural destinations. Potential improvements for considerations have been identified along each route.</p> <p>Alternative routes to the key destinations have also been identified that are safer for night time travel, in line with TfL and the Mayor's aim to promote women's safety at night. The review demonstrates that these attractors can be accessed along main roads that are lit, legible and have passive surveillance. Some observations specifically related to night time travels have been identified and opportunities for change have been noted.</p>	<p>The proposed development will bring about significant improvements to the public realm that form parts of the key active travel routes identified, such as streetscape upgrade along Edgware Road and Harrow Road, provision of safer waiting space through a bus shelter on Harrow Road and proposed pedestrian crossing at the junction of Edgware Road / Paddington Green. These will enhance the existing provision on look and feel of the area, lighting, permeability across the site, and perception of safety through active and passive surveillance.</p> <p>The proposed pedestrian and cycling access points and connections will be located to meet desire lines to key destinations.</p>

	Key transport impacts / issues	Solutions / mechanisms
London-wide network	<p>There will be increases in trips across all modes in the AM and PM peak hours. The proposed development is car-free with low numbers of vehicle trips generated.</p> <p>An assessment of the public transport usage / capacities, walking and cycling infrastructure, and vehicular flows, show that the increases are considered will not cause any significant adverse impacts on the operation of the transport networks.</p>	<p>Mitigation embedded in the design of the scheme, such as improved pedestrian and cycling facilities and car parking limited to accessible bays only, to promote active travel and reduce impact on public transport and the highway network.</p>
Construction	<p>The site is well located to the strategic highway network.</p> <p>The number of construction vehicles are expected to be low, around one vehicle an hour.</p>	<p>Outline CLP has been prepared.</p> <p>Direct access to the site from the strategic network is proposed to minimise the impact on local streets.</p>

Appendix A

TfL post-April 2021 TA submission comments



Your Reference: 21/02193/FULL

TfL Reference: WSTM/20/97
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By e-mail only to nbarrett@westminster.gov.uk

5th July 2021

Dear Nathan,

Paddington Green Police Station, 2-4 Harrow Road, Westminster
– TfL's Detailed Comments

Thank you for consulting TfL Spatial Planning. Please note that these comments represent an officer level view from Transport for London and are consistent with the Mayor's initial response to the application at Stage 1, Planning Report 2021/0477/S1 dated 21st June 2021. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

Site Location and Context

The proposals comprise of demolition of existing buildings and redevelopment of the site to create a residential development which is the final phase of the wider masterplan for West End Gate (844 units), phase 1 and 2 are in the final stages of completion, to the north the neighbouring north of the site. The development comprises of;

- Demolition and redevelopment of the site to provide three buildings, up to 32 storeys in height of 556 residential units, including 210 affordable homes.
- Ground floor commercial uses, flexible community/affordable workspace

- Stopping up of Newcastle Place, provision of private and public amenity, landscaping, tree and other planting, public realm improvements, new pedestrian and cycle links, provision of public art and play space.
- Plant, servicing, disabled car parking, cycle parking, connecting through the basement of West End Gate.

The Paddington Green Police Station development site is south of the West End Gate masterplan area. The site is bound by Harrow Road, Newcastle Place, Paddington Green and Edgware Road. Edgware Road and Marylebone Flyover form part of the Transport for London Road Network (TLRN). Marylebone Flyover connects to Harrow Road which forms part of the Strategic Road Network.

The site is very well connected by public transport with Edgware Road London Underground (LU) station to the east of the site on Edgware Road, served by the Bakerloo, Hammersmith & City, Circle and District LU lines. Approximately 650m to the south-west of the site is Paddington National Rail and LU Station. Marylebone National Rail and LU Station (Bakerloo, Circle, Hammersmith and City, Jubilee and Metropolitan Line, Chiltern Railways) is 800m to the east of the site. There are a number of bus stops on Edgware Road and Harrow Road, providing strategic connections throughout London and therefore, the site benefits from a public transport access level (PTAL) of 6b, on a scale of 0 – 6b where 6b is the highest.

There are also a number of cycle hire docking stations within the vicinity of the site. The closest is located on Paddington Green, to the west of the site. Further docking stations are located on Edgware Road. The site is well positioned to connect to numerous cycleways (3, 2 and 16), all within 10 minutes cycling distance of the site.

Site Access and Vision Zero

The development site will connect to all surrounding roads by providing ground floor active frontages and new north-south traffic-free pedestrian / cycle links. Newcastle Place which connects WEG and the development site (PGPS) is proposed to be formally stopped up to provide a privately maintained, pedestrian priority public realm space. Vehicular access will be controlled and raised table crossings will be provided along Newcastle Place. The street will limit vehicle traffic within the development site which is supported in principle.

In order to meet Policy 1 of The Mayor's Transport Strategy the development must be designed to reduce road danger. TfL expect all new development to meet the Mayor's aim for all deaths and serious injuries from road collisions to be eliminated from London's streets by 2041 and high-quality street design is key to achieving this.

Newcastle Place is a borough road, but is accessed from Edgware Road (TLRN). A Stage 1 Road Safety Audit (RSA) has been completed by a third party for Newcastle

Place. The audit has not been prepared in line with TfL's Road Safety Audit procedure guidance. The report raised a potential issue of the bollard location which may result in vehicles queuing back onto Edgware Road. The applicant has altered the position of the bollards, repositioning them further into Newcastle Place to avoid this happening.

Based on the predicted traffic flows there is not expected to be an issue with vehicles queuing back onto Edgware Road. However, it is understood that the bollards will be manned, and 'unauthorized' vehicles will be let through Newcastle Place rather than being forced to reverse back onto Edgware Road. While this is welcome, it will need to be robustly managed and further information is required to understand how this will be achieved. The final layout of Newcastle Place (where it interacts with the TLRN) should be subject to full review and a Road Safety Audit (to SQA-0170 TfL standards). The proposed highway changes to the TLRN are also subject to a s278 Agreement. A requirement to enter into a S278 agreement with TfL should be secured via a S106 obligation attached to any permission for those works affecting the TLRN.

Healthy Streets and Landscaping

TfL's Healthy Streets Approach aims to improve air quality, reduce congestion and make attractive places to live, work and do business. The development, alongside WEG will create a new residential neighbourhood, complemented by ground-floor commercial and community uses, creating a new destination and improved sense of place for residents.

An Active Travel Zone (ATZ) assessment has been prepared in line with London Plan Policy T2 Healthy Streets and an assessment of the site against the HS Indicators. The majority of improvements are centred around Newcastle Place and the internal site layout. The proposed improvements to Newcastle Place, Edgware Road and Harrow Road see an increased HS score compared to the existing site situation. On the TLRN, the HS score for the development's Edgware Road frontage sees an increase from 57 to 71 and for the SRN on Harrow Road, from 62 to 70. The development will also benefit from TfL's recent Safer Junctions scheme which has been implemented on the Edgware Road / Harrow road junction, improving the street environment for pedestrians and cyclists.

The internal site layout introduces traffic free routes, landscaping, improved permeability and new connections for pedestrians and cyclists which meets many of the Healthy Streets Indicators. As identified within the submitted TA, the subway on the corner of Harrow Road and Edgware Road does not adequately support increased active travel arising from this proposal. TfL has a scheme to transform the subway into a Rain Garden at the south-eastern corner of the development which will significantly enhance the public realm and environment for pedestrians and cyclists. From review of the submitted landscaping and arboriculture proposals there are currently a number of issues which should be addressed prior to determination. The applicant was made

aware of these issues on the 25th May but has not yet followed up with TfL to arrange a meeting as suggested. The issues are as follows;

- The rain garden design involves filling in the subway and taking water from the carriageway and footway, it includes tree species (Acer ginnala) specially selected to be able to cope with the tough conditions in this location. This will be beneficial from an environmental perspective and also improves the public realm in this location.
- The need for on-street cycle parking is acknowledged, however, further discussion is required about the extent to which the rain garden is paved over. It is requested that the applicant works together with TfL to find a balance between the provision of cycle parking and retaining the rain garden trees. TfL plans to retain water from the carriageway and requires an area of the pedestrian ramp adjacent to the bus stop on Edgware Rd. The proposed cycle parking location does not allow for this.
- TfL do not support the proposal for an avenue of London Planes at this location. The species and diversity of trees proposed should be discussed in detail with TfL, more species diversity should be provided in the landscape plan. The current proposals are dominated by monocultures, a greater species mix will have greater biodiversity benefits as well as greater climate change and disease resilience. A similar aesthetic result can be achieved by selecting species with similar forms, flowering etc.
- An Arboricultural Method Statement (AMS) is required, pruning works relating to the development should be addressed in the AMS.

As it stands, the proposed landscaping and public realm plans must be revised to ensure they do not have an adverse impact on the delivery of the Rain Garden scheme, in line with Policy T1 and Policy T2 of the London Plan, 2021. As the proposal will support active travel users from this development, a financial contribution towards the delivery of this scheme is requested.

Cycle Parking and Cycle Hire

New development has the opportunity to provide high-quality cycle parking which should be designed in line with London Plan Policy T5 and Chapter 8 of the London Cycle Design Standards (LCDS). A total of 960 cycle parking spaces are proposed which meets the minimum quantum required by policy. Long-stay spaces are provided in the basement for the residential and office element and will be provided in each ground floor unit for the commercial elements.

The cycle storage comprises of 95% two-tier stands and 5% Sheffield stands. Two-tier stands are not appropriate for all users and therefore it is requested that a greater mix of cycle storage racks are provided. Sheffield stand provision should be increased to a

minimum of 20%. Detailed cycle storage layout plans should be provided to understand how the cycle storage design meets the spacing, dimensions and layout requirements of the London Cycle Design Standards. This detail should ideally be provided prior to determination.

The rise in residential development in this location will increase demand upon local cycle hire stations. It is requested that a financial contribution of £200,000 is secured to increase provision of cycle hire in the area and mitigate the site-specific impacts of the development in line with Policy T4.C

Car Parking

The development provides no new general car parking which is in accordance with London Plan Policy T6.1, which expects car-free developments in areas with high PTAL. This also meets the objectives of Policy 1 of the Mayor's Transport Strategy which aims for 95 percent of all trips in Central London to be made on foot, by cycle, or using public transport by 2041. A total of 19 blue badge spaces are to be provided. In line with Policy T6.1, 3% of spaces will be blue badge (17 residential spaces and 2 commercial spaces based on 556 flats).

The end-users of the development should not be eligible to use the general parking within the basement by sharing the WEG provision. The development should be car-free and only those with a genuine need should have access to a parking space. The mechanism for managing the spaces should be set up in a Parking Design and Management Plan (PDMP). This should be secured by condition, to be signed off by WCC in consultation with TfL in line with Policy T4.B. Parking spaces should be leased rather than sold.

The proposed provision of 50% active and 50% passive provision for Electric or Ultra-Low Emission vehicles is welcomed and meets Westminster's policy standards.

Trip Generation and Pedestrian Comfort Level Assessment

A trip generation exercise has been undertaken based on TRICS data and 2011 Travel to Work, Census Data. The trip generation methodology has been agreed by TfL as part of the pre-application process.

The proposed development is forecast to generate 410 and 399 person trips in the AM and PM peak hours, respectively across all modes. The forecast cycle mode share of 5%, equates to 17 cycle trips in the AM Peak. The provision of 960 cycle parking spaces and connections to dedicated cycleways, means that the uptake of those choosing to cycle to / from the site should be higher. It is requested that a sensitivity

test is undertaken to reflect future mode share targets and the 2028 development opening date in line with Policy T4.

An assessment of the impact of the development on London Underground (LU) station capacity and line loading has been undertaken. Overall, the link load assessment is reasonable; it is anticipated that the impact from the development can be managed on the LU network, subject to clarification from the applicant regarding their chosen methodology. It is requested that further information is provided to explain which NUMBAT data was used in line with Policy T1 of the London Plan, 2021.

A pedestrian comfort level assessment has been undertaken which is welcomed. In order to fully understand the assumptions made TfL request the pedestrian flow network diagrams are provided in excel format for review.

Delivery and Servicing

Following recent events, the applicant should consider the Streetspace for London plan, which sets out how to create more space on streets for walking, cycling and social distancing as the lockdown is lifted. This may be important before, during and after construction and as it is a changing situation, TfL should be consulted regularly.

All delivery and servicing will take place within the site, with the majority being off-street within the basement; servicing consolidation between WEG and PGPS is being considered which is strongly supported by London Plan Policy T7. A strict Delivery and Servicing Plan (DSP) should be secured by condition and approved by the borough in consultation with TfL. The draft DSP objectives and measures have been prepared in line with Policy T7 which is welcomed.

Newcastle Place is a borough road and therefore the acceptability of the loading bay and access arrangement is for the Council to determine. However, TfL expect all on-street servicing in an area of shared space to be designed with The Mayor's Vision Zero Action Plan in mind. The street should be designed to ensure that on-street loading does not give rise to highway safety issues, particularly for vulnerable road users.

Construction

Extensive pre-application discussions have been carried out regarding the construction logistics for this site between the applicant, TfL and the borough. Workshops take place between the key stakeholders and TfL welcome the continuation of these meetings during the next stages of the planning process.

The site construction will require access to / from Edgware Road and Harrow Road over a 6-year build period. The measures in the draft Construction Logistics Plan (CLP)

generally meet the aims of Policy T7, however, in order to ensure full coordination of works in agreement with TfL the final CLP should be secured by condition and signed off by the borough in consultation with TfL for each phase of works.

The phased approval process is necessary to ensure the highway permissions and licences are in place to support the development construction and ensure minimal disruption to the strategic highway network.

All temporary highway works to the TLRN will require the applicant to enter into a Section 278 agreement with TfL. The applicant is undertaking consultation with TfL's s278 team, alongside this additional approvals under the Traffic Management Act 2004 are required by TfL prior to undertaking the works. It is expected that all costs are covered by the applicant.

Maintaining safe and accessible pedestrian routes during site construction is vital for TfL. This location attracts high pedestrian flows and should not be disadvantaged due to the site construction. Pedestrian footways and bus stops on Harrow Road and Edgware Road must be maintained as much as possible, any changes must be agreed in advance with TfL and the borough in line with London Plan, 2021 Policies T4 and T7.

The remaining trees on Harrow Road and Edgware Road will need to be adequately protected during the demolition and construction phases, details of which should be supplied in an Arboricultural Method Statement (AMS) in line with BS5837.

Travel Plan

A Travel Plan should be produced in accordance with TfL's guidance. The borough should secure, enforce, monitor, review and ensure the funding of the full Travel Plan through the S106 agreement to ensure conformity with Policy 4 of the London Plan, 2021. The Travel Plan should provide measures to encourage active travel.

It is acknowledged that the trip generation of the site will be mostly by sustainable modes (over 95%) however, a travel plan is required to ensure specific mode share targets are realised and active travel trips are monitored.

Summary

In summary, the proposed development provides a new residential led neighbourhood which improves pedestrian and cycle permeability through the Edgware Road / Paddington area. However, the proposed development does not yet meet the transport policies of the London Plan, 2021. Further information / consultation is required with TfL regarding the following issues:

- The applicant should arrange a meeting with TfL to discuss the public realm interaction with TfL's Rain Garden scheme. As the proposal will support active travel users from this development, a financial contribution towards the delivery of this scheme is requested in line with Policy T1 and Policy T2 of the London Plan, 2021. The public realm issues must be addressed prior to determination.
- Sheffield stand provision should be increased to a minimum of 20% and detailed cycle storage layout plans should be provided prior to determination.
- Further information is required regarding the trip generation and to understand which NUMBAT data was used in line with Policy T1.
- The PCL pedestrian flow network diagrams should be provided in excel format for TfL technical review.

TfL request that on successful completion of the above issues, the following conditions / obligations would be expected as part of any recommendation for planning approval:

- TfL as the highway authority for Edgware Road must approve the final layout of Newcastle Place (where it interacts with the TLRN). This should be subject to full review and a Road Safety Audit (to SQA-0170 TfL standards).
- An Arboricultural Method Statement (AMS) is required.
- A Parking Design and Management Plan (PDMP) is required in line with Policy T4.B.
- A Travel Plan should be secured by condition in line with Policy T4 of the London plan.
- A Delivery and Servicing Plan (DSP) should be secured by condition and approved by the borough in consultation with TfL in line with Policy T7.
- A Construction Logistics Plan should be secured by condition for each phase of works and approved by the borough in consultation with TfL in line with Policy T7. A separate Section 278 agreement with TfL for both the temporary and permanent works is required, as are additional approvals under the Traffic Management Act 2004. A requirement to enter into a S278 agreement with TfL should be secured via a S106 obligation attached to any permission for those works affecting the TLRN.
- £200,000 should be secured towards cycle hire.

- In accordance with London Plan Policy T9, MCIL2 was introduced in April 2019. The applicant should ensure they are aware of the regulations.

I hope you find these comments useful and trust you will consider them fully when determining the planning application. Please do not hesitate to contact me if you have any questions.

Yours sincerely,

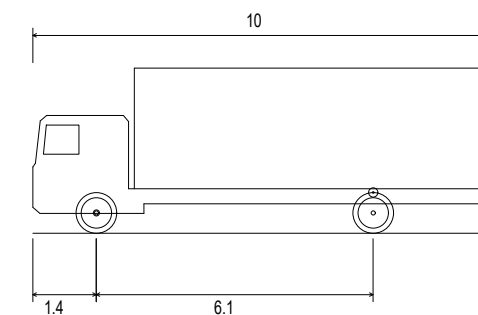
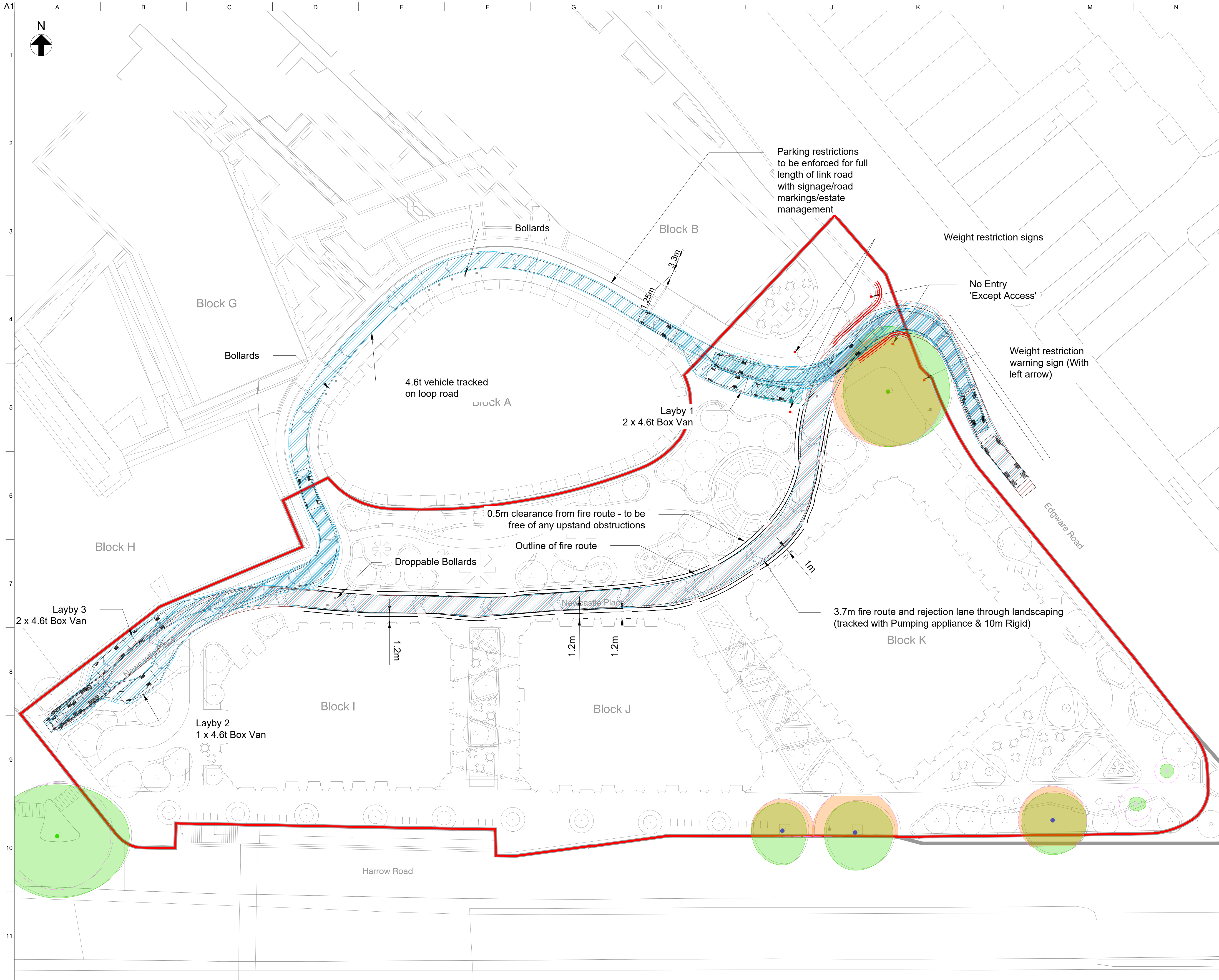
Chloe Flower

Area Planner (West), TfL Spatial Planning

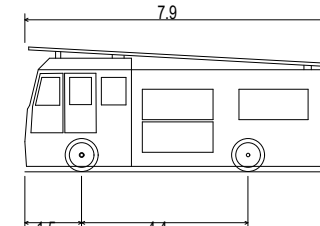
Email: ChloeFlower@tfl.gov.uk

Appendix B

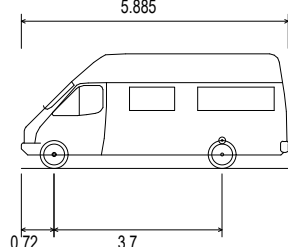
Technical drawings



FTA Design HG Rigid Vehicle (2016)
Overall Length 10.000m
Overall Width 2.500m
Overall Body Height 3.645m
Min Body Ground Clearance 0.440m
Track Width 2.470m
Lock to Lock Time 3.00 sec
Kerb to Kerb Turning Radius 11.000m



Pumping Appliance
Overall Length 7.900m
Overall Width 2.500m
Overall Body Height 3.300m
Min Body Ground Clearance 0.140m
Track Width 2.500m
Lock to Lock Time 4.00s
Wall to Wall Turning Radius 8.350m



4.6t Light Van
Overall Length 5.885m
Overall Width 2.000m
Overall Body Height 2.526m
Min Body Ground Clearance 0.299m
Track Width 1.765m
Lock to Lock Time 4.00 sec
Kerb to Kerb Turning Radius 6.000m

- Key
- Tree canopy
 - Root protection area

A	11/10/22	DB	SY	AF
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Rev	Date	By	Chkd	Appd
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Client
**Berkeley Homes
(Central London) Limited**

Project Title
Paddington Green Police Station

Drawing Title
**Loop Road Review
Swept Path Analysis**

Scale at A1
1:200

Role
Transport

Suitability
- For Information -

Arup Job No 277685-00	Rev A
Name 277685-SK-057	