



PADDINGTON GREEN
POLICE STATION

Planning Statement

Planning Statement - January 2023 - GLA0711
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January 2023

Planning Statement

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

January 2023

Turley



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Executive Summary

1. This Planning Statement supersedes the March 2021 Planning Statement that was originally submitted in relation to the proposed development of this site, and should be read on a standalone basis, as should every other report submitted as part of this November 2022 submission. As such, within this Planning Statement where reference is made to another report submitted as part of this application (including the Replacement ES), it is referring to the November 2022 amended proposed development (referred to as 'the proposed development' in this statement).
2. The redevelopment and delivery of the Paddington Green Police Station (PGPS) site represents the final piece of the wider West End Gate development, the earlier stages of which are currently being delivered (set out later in this statement). The West End Gate Masterplan is Westminster's single largest housing site, which in total across the three sites (including PGPS) will deliver 1,400 new homes to Westminster including 394 on site affordable homes, alongside a range of complementary employment uses, transformative public realm and place shaping improvements.
3. The nature and scale of the proposed development, including its potential contribution to the delivery of housing and affordable housing at a borough and London-wide level is such that it has a significant potential impact on the implementation of the London Plan in terms of provision of new homes and affordable homes.
4. The delivery of PGPS and the West End Gate Masterplan more generally is also essential to facilitate the delivery of the City Council's adjacent Church Street Masterplan. The West End Gate Masterplan is providing affordable homes for current Church Street residents, which will then free up sites within Church Street for their redevelopment as part of the Council's vision.
5. The PGPS site has been vacated by the Metropolitan Police after serving as the capital's highest security police station since the 1970's; comprising a front of house police station, offices, and a section house, alongside high security cells and custody suite. The site was earmarked for disposal as part of the Mayor's Office for Policing and Crime's (MOPAC) estate strategy.
6. Berkeley has been developing plans for the site's incorporation into the West End Gate Masterplan for some time now, and following the disposal of the site by MOPAC to Berkeley this proposal has evolved over the last 3 years through extensive design development, informed by an ongoing process of consultation, both with Westminster and Greater London Authority (GLA) officers, and with local residents, Councillors, the London Review Panel and other stakeholder groups. The proposals have evolved further following being heard at Westminster's Major Applications Planning Committee in September 2021, and the subsequent call in of the application by the Mayor of London, as set out in this document and the wider submission.
7. The submitted amended proposal transforms what is currently a hostile, 'fortress' island site, reflecting the previous high security police function. The proposal opens up the ground floor and public realm, delivering active uses, enhanced public spaces and new routes through and around the site for pedestrians and cyclists, connecting the site

through to West End Gate and Paddington Green, and reducing security concerns and anti-social behaviour through delivering active frontages. The existing police station detracts from the local townscape and local heritage assets, which the proposed buildings significantly improve.

8. The ground floor is to be activated around the site by a range of commercial uses including shops and restaurants, and a bespoke community use. Newcastle Place is transformed into a pedestrianised and landscaped public space and route connecting Edgware Road and Harrow Road to Paddington Green. Vehicular access is directed around the north of Westmark (Block A at West End Gate), allowing the central element of Newcastle Place to be fully pedestrianised with emergency vehicle access only. New play spaces will be delivered along with a series of new defined public realm and landscaping character areas including a new public garden facing Paddington Green and a new plaza area of public realm on the corner of Edgware Road and Harrow Road.
9. Significant new tree planting will be delivered around the site, alongside the provision of extensive planting, new lawn areas, public art and water features alongside public seating and dwell spaces, and short stay cycle parking within the public realm.
10. At the heart of the proposal is significant housing delivery, which underpins the scheme. There are three principal buildings delivered through the proposals, with their scale responding to the surrounding context around the site, as does the architectural approach and treatment which introduces variety across the three buildings, which are of the highest quality sustainable design and architecture.
11. The site is a key gateway junction into Westminster where the Westway terminates coming into Marylebone Road adjacent to the Paddington Basin. As part of these proposals, this key junction is marked by a slender tall building on the corner of Edgware Road and Harrow Road, marking this gateway into the West End and a key area of activity around Paddington.
12. In terms of housing delivery, PGPS will deliver 556 new homes to Westminster, representing half of one year of Westminster's annual delivery target, and adding to the 844 homes already being delivered at West End Gate and Paddington Green. The site is of strategic importance to Westminster and London more generally, and by some way is the largest private sector led housing site in Westminster.
13. In terms of affordable housing provision, the proposal will be 'fast track' compliant, by virtue of a portfolio agreement, with 39% of the homes on site being affordable housing (38% by habitable room), comprising Social Rented (60% by habitable room) and Intermediate homes (40% by habitable room) in line with emerging Westminster policy and supporting the future redevelopment of neighbouring Church Street. The proposal will deliver significant housing choice including family sized housing and wheelchair accessible homes, in homes that will meet all required standards of residential quality, while all homes will benefit from access to private and communal amenity space.
14. The site is subject to a portfolio agreement between the Mayor of London and MOPAC, which has been shared with Westminster officers. This agreement has two main purposes. Firstly the agreement ensures that a minimum of 35% affordable housing is delivered on the site at Paddington Green. Secondly it ensures that the target of 50%

affordable housing (by habitable room) on public sites, as required by the London Plan policy, is met across the portfolio of MOPAC owned sites. The application complies with this agreement by providing 39% affordable homes on site (38% by habitable room) with the remainder being provided at the Hendon MOPAC sites.

15. As such the proposal will deliver significant public benefits of strategic importance to the delivery of the London Plan and Westminster City Plan as detailed in this planning statement, both on this site individually, and in facilitating the delivery of Westminster's neighbouring Church Street Masterplan. The site will deliver strategically important levels of new housing and affordable housing to Westminster and London more generally, while delivering complementary commercial uses that will provide employment opportunities and economic benefits. The development will generate significant CIL receipts for investment in infrastructure in the local area and Westminster more widely.
16. At the heart of the proposals is the transformation of the local environment, public realm and the townscape. New buildings of the highest quality, sustainable design and architecture will be delivered alongside new pedestrian and cycle routes through and around the site, new public open space, play space, significant tree planting, greening, and landscaping, in addition to informal and formal dwell space, while residents will benefit from private and communal amenity space. The proposals will deliver enhanced connectivity to the Paddington Basin, and contribute significantly to the Council's and TfL's place making ambitions for the Edgware Road and Harrow Road junction, and through to Paddington.
17. Central to this is the proposed stopping up of Newcastle Place, which will facilitate the holistic re-design of the entire space, putting pedestrians and cyclists first by pedestrianising a majority of the space. Importantly, vehicular access will be highly controlled, and limited to small deliveries to the development only, passing round the north of the Westmark tower and not through the central space of Newcastle Place. This allows the creation of a central green lung to the development.
18. All servicing more generally will take place off street and within the development, principally at basement level which connects through to West End Gate, accessed from Church Street as existing. The removal of vehicles and traffic facilitated by the stopping up and pedestrianisation proposal underpins the delivery of the substantial environmental improvements set out above and re-purposing of Newcastle Place as a calmer, inviting and active amenity space for the local community.
19. In addition, much like West End Gate and all other Berkeley sites across Westminster, the intention would be for the site to be delivered straight away from the grant of planning permission, ensuring the swift delivery of the scheme, and the significant associated public benefits set out in full later within this report.
20. Since WCC's Planning & City Development Committee's resolution to refuse planning permission in September 2021 extensive engagement has been undertaken with GLA and WCC officers to maximise the public benefits of the scheme. The key improvements are:

- Increased **Affordable Housing** to 38% by habitable room (+1%) and improved provision with increased Social Rent tenure, from 49% by habitable room to 60% (exceeding WCC's current policy requiring 40%).
- Increased family sized homes within the Social Rented tenure.
- Better **residential quality** with removal of all north facing single aspect homes and 10% increase in dual aspect.
- Reduced daylight and sunlight impacts to neighbours compared to the previously submitted scheme
- Improved daylight and sunlight results and increased residential quality of proposed homes
- **Improved design** with fire strategy revised to meet emerging recommendations, with dual stair cores in every building
- Blocks slimmed to create greater distances between blocks and neighbouring blocks
- Heights reviewed and designed to provide better townscape cluster
- Podium removed, increasing north/south permeability through the scheme
- Improved **energy strategy** providing 66% reduction in carbon emissions, from policy minimum 35% reduction
- Better **public realm** for both residents and the local community with 53% increase from the previous scheme and significant enhancements
- Architectural and landscape design revised and improved using GLA and LRP feedback
- Improvements to the developments Urban Greening Factor
- Delivery of a new community space fronting onto a publicly accessible garden

1. Introduction

- 1.1 This Planning Statement has been prepared on behalf of Berkeley Homes (Central London) Ltd, in support of an amended application for full planning permission to the Greater London Authority for the following phased development of the Paddington Green Police Station site ('PGPS'), 2-4 Harrow Road, London, W2 1XJ:

'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.'

- 1.2 The site is bound by Harrow Road and The A40 Westway to the south, Paddington Green to the west, Newcastle Place to the north and Edgware Road to the east. The site has excellent public transport accessibility being directly opposite Edgware Road Underground Tube Station (serving the Bakerloo, Circle, District, Hammersmith & City Lines), in close proximity to Paddington Railway Station and being serviced by a number of bus routes.
- 1.3 The existing site consists of a single, interconnected building, albeit with a number of different, interrelated built forms. This includes the 17 storey accommodation/section house on the eastern side of the site, a main office and police front of house 3-storey building below this on the eastern side of the site, and an 8 storey annex at the western side of the site, connected by a single storey building that previously housed high security cells. The site also includes a single level of basement and a surface level podium car park to the rear, both accessed from Newcastle Place.
- 1.4 The western side of the site (the Annex) was in lawful use as offices between February 2021 and February 2022 following the grant of an associated planning permission in 2020. The remainder of the site is largely vacant having been disposed of by the Metropolitan Police as part of the Mayor's Office for Policing and Crime's (MOPAC) estate strategy, having previously housed a range of local and London-wide police functions. This included a neighbourhood front of house police service, section house accommodation serving the whole of London, high security custody suite and cells, and a series of offices accommodating pan-London police functions and services.
- 1.5 The front of house community policing desk closed at Paddington Green in 2018, and the site has been largely vacated since then, with all services relocated to other parts of the Metropolitan Police estate in line with their estate management plan. The police then used the site on an ad-hoc basis until Berkeley Homes acquired the site mid-2020, since then the site has been subject to well publicised squatting and anti-social behaviour. This has since been addressed, with part of the site having come back into lawful use as offices following the grant of planning permission in 2020 (see above and below).

- 1.6 The existing buildings are of no architectural merit and their demolition has been accepted in principle and is fully supported by Planning and Design and Conservation officers at Westminster and the GLA, for the site to be comprehensively redeveloped.
- 1.7 The redevelopment of this site will be the third (and final) piece of the West End Gate (WEG) Masterplan which, to date, is the single largest housing site in Westminster, delivering a total of 844 homes. WEG commenced construction in 2017 with Block C (along Edgware Road) being the first block occupied in 2020, Block's B and D in 2021, with these blocks consisting solely of affordable homes, which have been taken on by Westminster Council.
- 1.8 The applicant has undertaken extensive discussions at all stages of this project, both up to and post Westminster planning committee in September 2021 and prior to the submission of this amended application with the GLA, including consultation with the London Review Panel which has better informed the design, setting and layout of the proposed residential-led mixed use development. Discussions have also taken place with Transport for London (TfL) to better inform the highway works, construction and logistics of the scheme and the proposed stopping up and part pedestrianisation of Newcastle Place which will allow ease of travel within the development site and deliver transformative landscaping and public realm improvements. This is in addition to a comprehensive public consultation exercise as set out in this Statement and supporting documents to the application.
- 1.9 As set out later in this document, the application has been heard at Westminster's Major Planning Applications Committee in September 2021 where it was recommended for approval by officers but then the committee members resolved to refuse it. Subsequently the application has been called in by the Mayor of London who has become the determining authority for the proposal. Since this time, discussions around revisions to the scheme have been taking place with GLA officers, the Mayor's London Review Panel, and been subject to further public and stakeholder consultation.
- 1.10 Berkeley Homes are a nationally recognised house builder, committed to delivering high quality new homes across London. The business has successfully gained planning permissions on a number of large, residential led mixed-use schemes within Westminster in recent years which were all commenced and occupied as early as possible, demonstrating a track record for delivery and quality. A summary of recent schemes is set out below:
- 190 Strand was granted planning permission in March 2012 with works commencing the same year following the approval of all pre-commencement conditions. The scheme built 216 new residential units was completed in January 2018.
 - Ebury Square was completed in 2014, providing 71 high quality homes at the heart of Belgravia, and was also designed by Squire & Partners.
 - 9 Millbank and Ergon House was granted planning and Listed Building Consent (LBC) consent in July 2014 with works commencing in 2017. The scheme is creating 202 new residential units and is due to complete by the end of 2022.

- Abel and Cleland House was completed in 2016, delivering 206 homes in the heart of Pimlico, a short distance from 9 Millbank and Ergon House, comprising two buildings with interconnected public realm and landscaping.
- West End Gate was granted planning permission in April 2016 with work commencing on site in 2017. Site one (Blocks A - E/F) which creates 628 new residential units is due to be completed by the end of 2022.
- 14 – 17 Paddington Green, which is site two (Blocks G - H) of WEG Masterplan, was granted planning and Listed Building Consent in December 2017. Demolition commenced in 2019 and completion is expected in 2025. The scheme will create 216 additional new homes.

1.11 This Planning Statement analyses the Proposed Development against the National Planning Policy Framework (NPPF), the Development Plan and the relevant material planning considerations.

Content of application

1.12 The application was originally submitted electronically via the Planning Portal, however the application revisions have been directly submitted to officers electronically. The full submission supersedes the initial documents, and should be read in stead of (as opposed to alongside) the previously submitted documents.

1.13 The application is accompanied by a Replacement Environmental Statement (ES) prepared by Ramboll which assesses the impacts of the Proposed Development, which has been developed in the context of a comprehensive ES scoping exercise with Westminster and other relevant stakeholders. Additional revised individual technical reports and plans are submitted as detailed below.

1.14 An overview of the revised submission documents accompanying this application is provided below:

- Covering letter
- Planning Application Form
- CIL 'Additional Information' Form
- Site Plan and Site Location Plan, prepared by Squire & Partners
- Existing and Proposed Plans, Elevations, Sections, Demolition Plans and accompanying drawings register, prepared by Squire & Partners
- Design and Access Statement (DAS), including Landscaping strategy and associated plans, prepared by Squire & Partners
- Structural Statement (Chapter within DAS) and Structural Method Statement, Prepared by Walsh
- Illustrative drawings containing plans and elevations, prepared by Squire & Partners
- Area schedule, prepared by Squire & Partners
- Unit mix schedule, prepared by Squire & Partners

- Planning Statement prepared by Turley (this document)
- Heritage Statement, prepared by Montagu Evans
- Tall Building Policy Assessment, prepared by Montagu Evans
- Daylight and Sunlight Report, Prepared by GIA
- Energy Assessment, prepared by Buro Happold
- Circular Economy Statement, prepared by Buro Happold
- Sustainability Statement (including Whole Life Carbon Assessment), prepared by Buro Happold
- Be Seen Evidence, prepared by Buro Happold
- BREEAM Pre-assessment, prepared by AESG
- Drainage Strategy Report, prepared by Walsh
- Transport Assessment, prepared by Arup
- Arboricultural Report, prepared by Tree Fabrik
- Code of Construction Practice Appendix A, Berkeley Homes
- Statement of Community Involvement, prepared by Concilio
- Ventilation Statement, prepared by Buro Happold
- Waste Management Strategy, prepared by ARUP
- Lighting Strategy, prepared by Squire & Partners
- Biodiversity Net Gain, prepared by Ramboll
- Health Impact Assessment, prepared by Ramboll
- Fire Statement, prepared by AESG

Replacement Environmental Statement

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

- Non-Technical Summary (NTS);
- Volume 1: Main Environmental Statement;
 1. Introduction;
 2. EIA Process and Methodology;
 3. Alternatives and Design Evolution;
 4. Proposed Development Description;
 5. Demolition and Construction Description;
 6. Socio-Economics;
 7. Air Quality;
 8. Noise and Vibration;
 9. Wind Microclimate;
 10. Daylight, Sunlight, Overshadowing and Solar Glare;
 11. Cumulative Effects;

- 12. Summary of Residual Effects; and,
- 13. Glossary of Terms and Abbreviations.

- Volume 2: Townscape, Visual and Built Heritage Assessment (TVBHA);
 - Technical Appendix 1.1: Legislation and Policy
 - Technical Appendix 1.2: AVR Methodology
 - Technical Appendix 1.3: Map of Townscape Receptors
 - Technical Appendix 1.4: Map of Heritage Receptors
 - Technical Appendix 1.5: Zone of Theoretical Influence
 - Technical Appendix 1.6: Map of Viewpoint Locations
 - Technical Appendix 1.7: List Entry Descriptions
- Volume 3: Technical Appendices
 - Technical Appendix 1.1: IEMA Quality Mark Checklist
 - Technical Appendix 1.2: Regulation 18(5)(b) Statement
 - Technical Appendix 2.1: EIA Scoping Opinion Request Report
 - Technical Appendix 2.3: Avison Young EIA Scoping Independent Review
 - Technical Appendix 2.3: EIA Scoping Opinion
 - Technical Appendix 2.4: Ecological Impact Assessment
 - Technical Appendix 2.5: Ground Conditions Preliminary Risk Assessment
 - Technical Appendix 2.6: Archaeological Desk Based Assessment
 - Technical Appendix 2.7: Flood Risk Assessment Statement
 - Technical Appendix 2.8: Transport Data
 - Technical Appendix 6.1: Socio-Economic - Planning Policy and Legislation
 - Technical Appendix 6.2: Socio-Economic - Magnitude Thresholds
 - Technical Appendix 6.3: Pupil and Net Capacity Forecast Data
 - Technical Appendix 6.4: Socio-Economic Cumulative Schemes Details
 - Technical Appendix 7.1: Air Quality Legislation, Policy and Guidance
 - Technical Appendix 7.2: EHO Consultation
 - Technical Appendix 7.3: Model Inputs and Results Processing Tools
 - Technical Appendix 7.4: Air Quality Background Concentrations, Transport Data and Model Verification
 - Technical Appendix 8.1: Noise and Vibration Legislation and Policy
 - Technical Appendix 8.2: Baseline Noise and Vibration Survey
 - Technical Appendix 8.3: Construction Noise Assumptions
 - Technical Appendix 8.4: Transport Data
 - Technical Appendix 8.5: Site Suitability Assessment
 - Technical Appendix 10.1: Drawings
 - Technical Appendix 10.2: Daylight and Sunlight Assessment (Surrounding Properties)
 - Technical Appendix 10.3: Daylight and Sunlight Assessment (West End Gate and Merchant Square)
 - Technical Appendix 10.4: Window Maps (Surrounding Properties)
 - Technical Appendix 10.5: Overshadowing Assessment
 - Technical Appendix 10.6: Solar Glare Assessment
 - Technical Appendix 10.7: Daylight and Sunlight Assessment (West End Gate and Merchant Square)
 - Technical Appendix 10.8: Alternative Method Justification

- 1.15 During the course of 2022, the Applicant has consulted regularly with the GLA. The responses and feedback received primarily relate to the design of the 2022 amended proposed development and the main comments and an explanation of how the Applicant has taken them into account is provided in Chapter 3(R): Alternatives and Design Evolution. No comments were received in respect of the scope of the EIA or methodologies adopted in the technical assessments, with the exception of the Townscape and Visual Impact Assessment, for which an assessment of additional viewpoints and heritage assets was requested. This is discussed further in Volume 3(R).
- 1.16 In light of the above, in accordance with Regulation 18(4)(a), the EIA has been undertaken and the 2022 Replacement ES prepared based on the EIA Scoping Opinion issued on 25 March 2021.

Planning Statement Structure

1.17 The format of this Planning Statement is as follows:

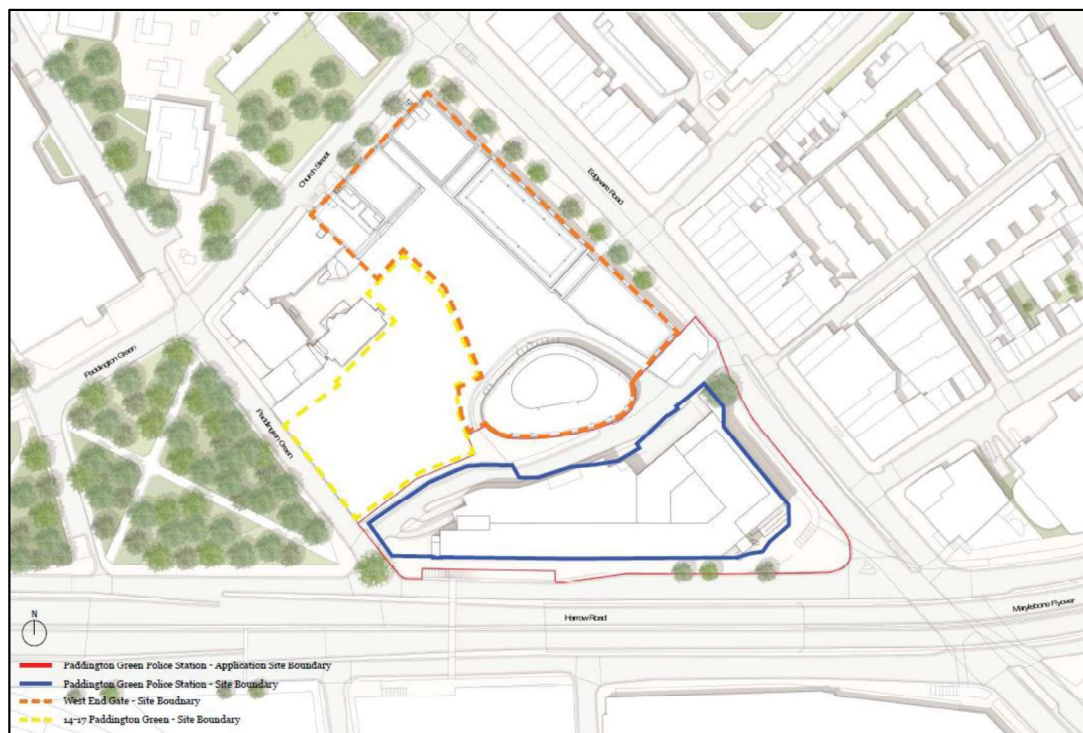
- Section 2 'Site and Surrounding Area': describes the site and its surrounding context.
- Section 3 'Planning History': sets out a summary of the relevant planning history for the site, and neighbouring sites of relevance.
- Section 4 'Proposed Development': provides a detailed description of the proposed development, highlighting the key aspects of the scheme.
- Section 5 'Pre-application engagement': details the process undertaken with WCC prior to submitting this application, and the evolution of the proposals.
- Section 6 'Planning Policy Context': sets out the relevant development plan and planning policy framework against which the planning application should be assessed.
- Section 7 'Planning Policy Considerations': provides an analysis of the material planning considerations pertinent to the proposed development and provides justification for the development and outlines the findings of the supporting specialist reports.
- Section 8 'CIL and Planning Obligations': identifies CIL considerations and likely heads of terms for inclusion in a section 106 agreement with the council.
- Section 9 'Public Benefits Summary': sets out all public benefits that are associated with the delivery of the scheme.
- Section 10 'Summary and Conclusions': summarises the key features of the proposed development, key considerations and sets out our concluding statements.

2. Site and Surroundings

The Application Site

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

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



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

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

Figure 2.2: Photo of existing site



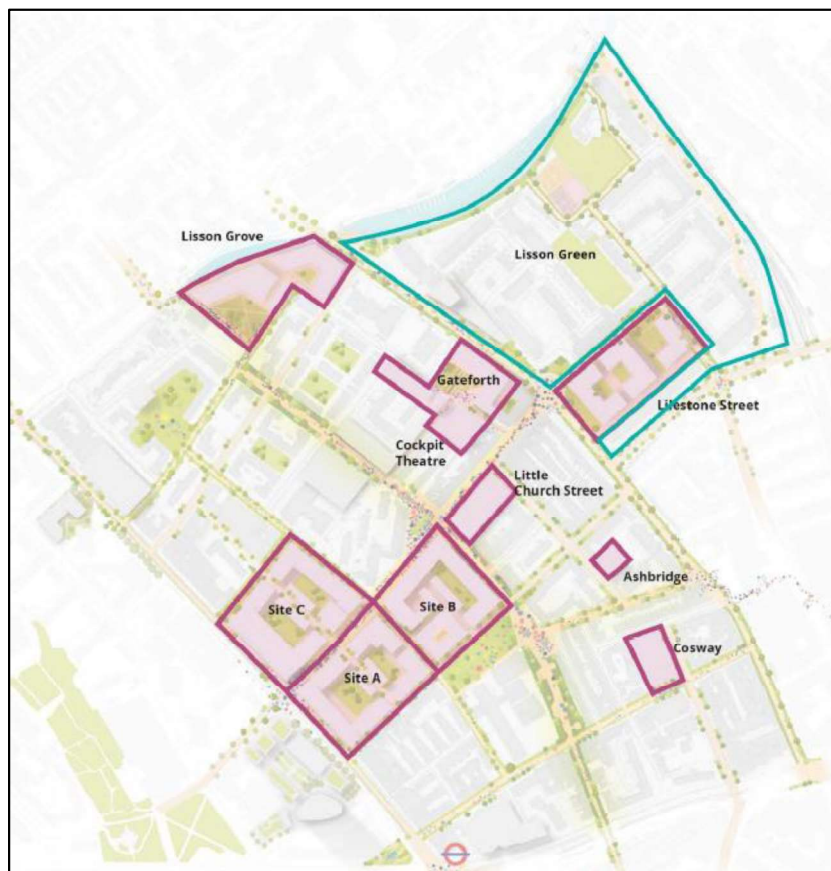
- 2.6 The site is located within the Central Activities Zone (CAZ), the Council's Edgware Road/Church Street Housing Renewal Area which is identified to deliver 2,000 new homes, and within the Mayor's Edgware Road Housing Zone, identified in 2014 to facilitate the delivery of 1,113 new homes.
- 2.7 The majority of the site is not located within a conservation area, save for a small parcel at the north western half of Newcastle Place which sits within the Paddington Green Conservation Area. The site does not contain a listed building. The site is located opposite and immediately to the south of the Church Street / Edgware Road District Shopping Centre, while the Paddington Opportunity Area is located directly to the south west of the site.

Surrounding Context - Church Street Masterplan

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

- 2.9 A number of key plans and report have guided and informed the Masterplan development including The Futures Plan (2012 – and subsequently updated) which is bringing forward a number of development schemes including Luton Street (RN: 17/08619/FULL) which is providing 170 new homes and has commenced, the Edgware Road Housing Zone (2014) and the City for All Programme (2017).
- 2.10 Seven areas have been identified for development in the Masterplan to come forward by 2032, including, Ashbridge, Cosway, Lilestone Street, Church Street sites (A, B and C), Lisson Grove, Gateforth and Cockpit Theatre and little Church Street. It should be noted that a hybrid planning application for Church Street Sites A, B and C is currently under determination following the submission of an application in 2021 (Ref. 21/08160/COOUT).
- 2.11 The West End Gate Masterplan has a critical role to play in delivering the Council's Church Street Masterplan (separate to the applicant's WEG Masterplan). The development is delivering significant affordable housing that has been taken on by the City of Westminster as new accommodation for existing Church Street residents. This will free up sites within Church Street for redevelopment as part of the Church Street Masterplan. West End Gate also delivers a re-activated commercial frontage to Edgware Road District Shopping Centre and delivers significant public realm and environmental benefits in line with principles and objectives of the Council's vision for this area.

Figure 2.3: Church Street Masterplan



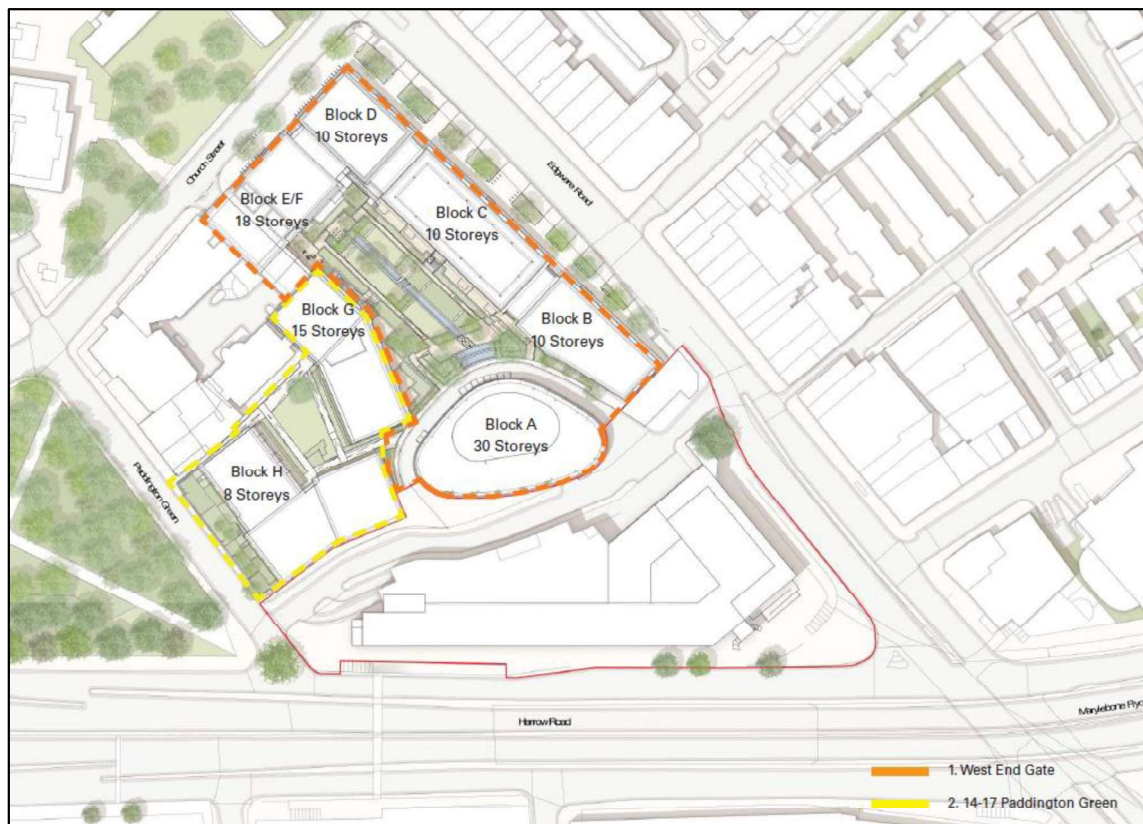
- 2.12 In summary the Church Street Masterplan seeks to deliver:

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

West End Gate and Paddington Green developments

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

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



2.14 Site two of the masterplan, to the north west of the site, facing Paddington Green, which is delivering circa 216 new homes includes blocks G and H and is expected to be

completed in 2025. As set out below, a minor material amendment application has been under consideration (under Ref. 22/03790/FULL) over the course of 2022 to introduce senior living (Use Class C3) to the Paddington Green part of the masterplan site – namely in Block G. This involves a reduction in the number of homes delivered through site 2 of the masterplan from 216 to 203, however with no change to the provision of affordable housing in this part of the masterplan, or the masterplan as a whole.

3. Planning History

- 3.1 The recent planning history is summarised below in table 3.1.
- 3.2 It should be noted that the current planning application under consideration by the Mayor of London at Stage 3 determination was submitted to Westminster Council in April 2021, Ref. 21/02193/FULL, and now has the GLA application reference GLA0711, with the description of development as set out elsewhere in this report.
- 3.3 Relevant recent planning history relating to the site is set out below.

'Annex' Change of Use to Office

- 3.4 The key recent planning history relates to a consented application for the change of use of the annex part of the site at the western end of the site for office use under Class E. This was consented in December 2020 and has been implemented, establishing the office use at the site.
- 3.5 The older planning history mainly relates to older operational works at the site. There are further advertising applications for a public call box, applications for the temporary installation of public art, and for the installation of telecommunications and CCTV equipment on the building.

Table 3.1: Relevant planning history

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

91/04645/1884	Repositioning Of Observation Post	Approved 18 October 1991
91/03630/1884	Single Storey Extension To Provide Cloakroom / Baggage Store	Approved 27 August 1991
91/00634/1884	Access Ramp For The Disabled At Main Entrance To Paddington Green Police Station On Harrow Road	Approved 12 March 1991

- 3.6 The building was originally consented in the late 1960s (ref. A.174.66) as a 'Divisional Police Station, district headquarters, and section house.' It is understood that construction on the building was completed in 1971.

WEG Masterplan – Site one and two Planning History

West End Gate (Site one)

- 3.7 As the redevelopment of this site will form the third site of the WEG Masterplan, it is important to also understand the wider consents permitted on WEG (site 1) and 14-17 Paddington Green (site 2) as set out below.

- 3.8 Planning permission for site 1 one of the West End Gate Masterplan was granted planning permission in April 2016 (RN: 15/11677/FULL) for:

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

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

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

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

- Amendments to allow the conversion of 20x 1-Bed Intermediate units into 20x 1-Bed Social Rent units on levels 1 - 10 within Block B, and conversion of 6 x 1-bed units from social rented to intermediate tenure within blocks E/F. Approved 16 December 2020. (RN: 20/05082/NMA).

- Amendments to the trigger on condition 15 related to the timescale for the provision of public art. Approved 20 November 2020. (RN: 20/01225/NMA).
- Amendment to the wording of Condition 48. Approved 04 November 2019. (RN: 19/07777/NMA).
- Minor revisions to Block E and F for the addition of 2 projecting balconies at level 16. Approved 04 October 2019. (RN: 19/07185/NMA).
- Reconfiguration of units on levels 23,25, 26, 27, 28 and 29 to provide an additional 11 residential units with external windows revisions to levels 26 - 29. Approved 27 June 2019. (RN: 19/04338/NMA).
- Amendment to allow the removal of Juliet balconies at Level 26 of Block A. Approved 07 Jan 2019. (RN: 18/10485/NMA).
- Amendments proposed to the unit mix on floors 1-10 of Block A at ground floor of Block C and all floors of Blocks G and H, inclusion of an additional bay of private residential balconies on floors 1-10 of the south facing elevation of Block A. Reduction in the footprint of block C. Approved 4 October 2016 (RN: 16/08442/NMA).
- Alteration to internal residential layouts, building footprint and exterior of Block D. Approved 9 November 2016 (RN: 16/10019/NMA).
- Optimisation of consented internal residential layouts to all floors of Block B and to vary the wording of planning conditions 49 and 34 in order to make them achievable and better address their original intention. Approved 24 April 2017 (RN: 17/02701/NMA).
- Amalgamation of units on 11th floor, 20th floor and 23rd floor. Approved 18 January 2018 (RN: 17/11430/NMA).
- Optimisation of internal layouts, the introduction of additional bays of inset balconies on the 9th and 10th floor and unit configurations which will result in an alteration to the unit mix within Block C and an overall increase of 4 unit numbers across the whole West End Gate development. Approved 26 July 2018 (RN: 18/05466/NMA)
- Reconfiguration of ground floor, removal of one side entrance canopy and reduction and redesign of front main canopy. Approved 26 Jul 2018 (RN: 18/05592/NMA).

14 – 17 Paddington Green (site two)

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

“Demolition and redevelopment of 14-16 Paddington Green; alteration and partial demolition of 17 Paddington Green; development of land to the east and south of 14-17 Paddington Green (part of site known as 'West End Green') to provide

buildings ranging between 4 and 14 upper storeys to provide up to 200 residential units, with associated landscaping, basement car and cycle parking and servicing provision. This application is accompanied by an Environmental Impact Assessment (Linked to application RN: 16/11563/LBC)”

- 3.12 A Minor Material Amendment application was granted on 29 March 2019 (RN: 18/08004/FULL and 18/08110/LBC) to allow the addition of one floor of residential accommodation to Block G and to parts of Block H to add 16 residential units and to reduce carbon offset payment to allow connection to Church Street District Heating Scheme.
- 3.13 A further Minor Material Amendment application has been under consideration throughout 2022 and was recently consented on 5th January 2023 (RN: 22/03790/FULL) to introduce senior living accommodation (within the C3 use class) to the site under the C3 Use Class. The senior living accommodation is located in the entirety of Block G with associated ancillary facilities, while Block H contains a reduced quantum of private residential accommodation, and an unchanged amount and mix of on site affordable housing. The application does not vary the heights of the buildings, and makes minor design revisions, principally to internal layouts and façade detailing.
- 3.14 The full planning history for both West End Gate and 14 – 17 Paddington Green, detailing all consents can be found in Appendix two.

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

- 3.15 Paddington Green Police Station was identified some time ago for closure and disposal as part of the MOPAC Estate Strategy. The Police & Crime Plan 2017-2021 commits to investment in the tools that police officers need to do their jobs, and investment in core buildings to create a modern environment for staff and the public.
- 3.16 In support of that objective, the disposal of surplus properties is set out to generate capital receipts in support of the capital programme. A number of properties were identified and approved for disposal in 2018/19, which included the Paddington Green Police Station.
- 3.17 As part of this, the front counter and Dedicated Ward Officers located at Paddington Green were relocated to adjacent Church Street by June 2018, which then meant there were no public facing functions and the building was vacant.
- 3.18 From that point until the exchange/sale of the building to Berkeley Homes in 2020, the MET Police used the building sporadically for parking and logistical functions in support of significant events policing, firearms training and other more ad hoc activities. As set out above, part of the site was previously occupied and in its lawful use as offices between February 2021 and February 2022, following the grant of a relevant change of use planning application in December 2020.

Church Street Front Counter Relocation Planning Permission

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

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

Relocation of Other Functions

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

4. Proposed Development

Summary of the Proposals

- 4.1 This amended application seeks full planning permission for the comprehensive phased redevelopment of the site. The proposal is for demolition of the existing building followed by the phased delivery of a residential-led mixed use development of the site, delivering active employment generating uses at the ground floor level, with strategically significant levels of housing delivery across the site, including (in excess of) policy compliant on site affordable housing provision, and over 50% affordable housing when considered with the additional off site provision as part of the wider MOPAC portfolio agreement.
- 4.2 More generally, the approach to the proposals is based on repairing the existing hostile street and pedestrian environment, putting place making and environmental improvements at the heart of the proposals, and completing the ambition being delivered across the West End Gate Masterplan.
- 4.3 A key part of this is the proposed stopping up and majority pedestrianisation of Newcastle Place, which creates the opportunity for significant new high quality landscaping and public realm works to be delivered, in an environment that prioritises pedestrian and cycle access, with vehicle access limited to small scale servicing only to the north of Westmark (Block A at West End Gate). New routes are created through the site, along with new character areas of public realm at the western end of the site fronting Paddington Green, a significant new plaza space on the corner of Harrow Road and Edgware Road, dedicated on site play space within Newcastle Place and other public realm areas.
- 4.4 The proposed development would comprise the following:
- Demolition of the Paddington Green Police Station buildings;
 - Excavation of level one and level two basements with a connection into the WEG development basement;
 - Erection of three buildings of 24 storeys (Block I), 17 storeys (Block J) and 39 storeys (Block K), set back from Harrow Road and Edgware Road;
 - Stopping up and pedestrianisation of Newcastle Place to deliver an associated landscaping and public realm masterplan, including play space provision, significant new tree planting and greening, prioritising pedestrian and cycle access, public art provision;
 - Vehicular access to Newcastle Place limited to small scale servicing/deliveries only directed around the north of the Westmark tower (in the neighbouring West End Gate development);
 - Creation of new pedestrian and cycle routes between and around the three proposed blocks, short stay cycle parking within the public realm;
 - Significant new hard and soft landscaping including new public amenity space, 77 new trees and play space, public art and other landscape features;

- Creation of 556 new homes, including 219 affordable homes, falling within Use Class C3 of The Town and Country Planning (Use Classes) Order 1987 (as amended);
 - 1,079 (GIA) sq.m of flexible Class E floor space in a range of units to deliver flexible retail and commercial uses at the ground floor;
 - 133 (GIA) sq.m of new Class F2 community space;
 - Private residential amenities including communal amenity space;
 - 17 accessible car parking spaces (within basement);
 - Over 1,000 long term cycle storage spaces for residential and commercial use. 10% shortfall in on-site cycle parking provision will be met in West End Gate – which will be subject to a separate amendment application to deliver this.
 - Servicing to take place fully within the development; namely through the WEG basement, and to the north of Westmark accessed via Newcastle Place entrance for small deliveries.
 - Residential and commercial/retail refuse stores.
 - All ancillary access, mechanical and electrical plant and soft/hard landscaping.
 - Significant carbon reduction, substantial biodiversity net gain and comprehensive sustainability strategy including on site renewable energy generation, with an ASHP and PV all electric energy strategy and a fabric first building efficiency model.
- 4.5 The proposed description of development is provided in paragraph 1.1 of the Introduction. The proposals have been developed in close consultation with GLA officers and through extensive public consultation and stakeholder engagement, with the revisions to the scheme resulting from engagement with the GLA post Westminster committee set out elsewhere in this Statement.

Scale, Massing & Layout

- 4.6 As set out above, the existing site comprises a taller building of ground + 16 storeys on the eastern end of the site, with a shorter building of ground + 7 storeys on the western end facing Paddington Green, stepping down further in the middle to ground. This hierarchy is maintained in the proposals, albeit the new proposals entail taller buildings.
- 4.7 The existing building has no architectural merit, being modern and utilitarian, reflecting the high security nature of the former use, and as such a negative feature in the townscape. As such, it contributes little to the townscape, and the principle of its redevelopment is uncontroversial. Elements of the existing public art found on the Harrow Road frontage of the existing building are however of some merit and will be retained and re-purposed in or around the site.
- 4.8 The new site layout has been driven by the unique form of the existing Paddington Green Police Station site and the need to introduce much needed permeability into the urban block/island site, to help repair the broken streetscape. A series of links from Harrow road will run north into Newcastle Place to allow for more pedestrian movement into and through the site. Throughout the evolution of the scheme's design, a continuous process of reviewing views and heritage considerations has been undertaken to reduce

any potential impacts and allow the integration of appropriate design mitigation if required or appropriate.

- 4.9 The proposed development is split across three blocks (I, J and K). The layout of these blocks and surrounding landscaping proposals is illustrated in Figure 4.1 below, which has been developed in detail with the GLA (as set out in section 5) to maximise public realm provision at the site, ensure the buildings are well spaced to the benefit of residential quality of life and to mitigate impact on neighbouring buildings. The aim is also to maximise permeability through and around the site, with routes and associated public realm character areas existing between and around each block, driven by an overall public realm and landscaping masterplan.
- 4.10 A key driver for the scheme proposals is the creation of a gateway tower on the corner of Edgware and Harrow Road that signifies the approach to the centre of London from the west. It is in this location that Block K, the 39 storey building, is proposed, which introduces a slim elegant building of height that sits within a wider cluster of tall buildings both on the site and in the immediate vicinity.
- 4.11 At the South Western end of the site, Block I has been placed to pick up on the importance of Paddington Green and mark the entrance to the wider West End Gate Masterplan via Newcastle Place, with a slender expression and footprint. Block J is the central block which has been developed to maximise the extent of light penetration to the centre of the site and provide a play on scale across the site.
- 4.12 The tall, slender form of each of the revised towers forms a cluster of tall buildings that step up in height, providing a marker and transition to the Paddington Opportunity Area, embracing the height of the existing Westmark, and culminate in the pinnacle of the 1 Merchant Square proposals to form a new visual gateway into London.

Figure 4.1: Proposed site layout



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

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

Block	No. of Storeys	Height in AOD (top of parapet)	Height in AOD (top of plant screen)
I	24	115.22	119.28
J	17	92.72	96.68
K	39	166.30	169.95



- 4.14 All three blocks provide active commercial frontages to Harrow Road, Edgware Road and the former Newcastle Place, comprising E-class units of varying sizes likely including new shops and cafés. This will provide employment opportunities for local residents, and local services for the existing and future residential community. A community use (Class F2) is provided at the western end of the site fronting onto the public realm and garden space adjacent to Block I.
- 4.15 Residential access to all three blocks is via the former Newcastle Place as well as an additional access to Block K being on the western elevation off of the new avenue space.

Residential Accommodation

- 4.16 The Proposed Development is for a total of 556 residential units across Blocks I, J and K, delivering a strategically significant number of new homes to London and Westminster, representing over half of one year's worth of Westminster's annual housing delivery

target, and over 5% of Westminster's ten year London Plan housing target through this single site.

- 4.17 The proposals have been developed to deliver a mix of tenures across the three buildings. Block I fronting Paddington Green is a solely private residential building, Block J a solely social rented block, and block K includes a mix of all three tenures comprising private homes, social rented, and intermediate (both shared ownership and intermediate rent rented) homes.
- 4.18 The affordable housing provision has been developed in consultation with GLA officers and Westminster's affordable housing manager, including the tenure and unit mix within each element of the affordable housing provision. The approach to the tenure distribution in individual buildings, combined with the high quality design and facade articulation to all buildings ensures a tenure blind approach to the scheme.
- 4.19 The accommodation schedule submitted alongside this application details the full breakdown of the proposed housing mix, split 62% private development and 38% affordable housing (by habitable room). A summary of the type and amount of units proposed across each of the blocks is provided in Table 4.2 below.

Table 4.2: Proposed Housing Mix Summary

Tenure	Manhattan	1bed	2bed	3bed	4bed	Total
Private	22	77	139	93	6	337
Social	0	11	50	46	2	109
Intermediate	13	59	38	0	0	110
Total Units	35	147	227	139	8	556
Total (%)	3.3	26.4	40.8	25	1.4	100%

Affordable Housing

- 4.20 The applicant seeks to deliver 219 affordable housing units (39%) on site, in excess of Westminster policy for the site. The off-site provision is discussed more in Section 7 of this report, but revolves around providing exceptional benefits to Westminster by offering the potential for nomination rights to further affordable housing being delivered in the London Borough of Barnet as part of MOPAC's wider estate strategy, which delivers a total affordable housing offer in excess of 50%.
- 4.21 The tenure split of the affordable housing has also been further developed and revised in discussions with the GLA to provide 60% social rented housing by habitable room. Within this, the range of unit sizes and types has been carefully curated in line with local need and the likelihood that Westminster will take on significant amounts of the affordable housing (social housing) to underpin the delivery of the Church Street masterplan.
- 4.22 To note, although policy allows for the delivery of either tenure, all affordable rented homes proposed are Social Rented tenure, as opposed to the less affordable London Affordable Rent (LAR) tenure.

Residential Quality

- 4.23 The proposed homes have been designed to maximise a 'dual aspect' orientation where feasible. Over 55% of apartments offer dual aspect views, an increase of 10% on the previous proposals, with no single aspect north facing units and all of the single aspect units facing south, east or west. To further enhance the outlook from apartments, wherever possible the return walls of the recessed balconies have been designed as full height glazing units, allowing more natural light into the apartment and offering a degree of additional aspect from each living space.
- 4.24 The basic design principles aim to deliver the optimised layout, orientation and views for each residential unit within a shape that responds to its environment, compliments the surrounding townscape and reduces overlooking.
- 4.25 All units meet and exceed the London Plan, Westminster City Plan and Nationally Described space standards, and comply with the requirements of The Mayor's Housing SPG (2016).
- 4.26 Each apartment has at least one private balcony accessed off a main living space. These have been arranged to provide the best views and environmental responses for each home. There is also communal amenity space in Block K for private tenants.
- 4.27 All residential units will benefit from floor-to-ceiling heights of 2.5m in living areas and bedrooms, while all other residential standards as set out in the London Plan and City Plan are met, delivering homes of high quality.
- 4.28 10% of the units are to be accessible for wheelchair users, with the remaining 90% being adaptable, and following the design principles of AD Part M4(3) and British Standard 8300:2018. All apartment layouts fully comply with AD Part M4 (3) and are easily accessible (please refer to the Access Statement in section 9 for further details).

Landscaping, Private and Public Amenity Space

- 4.29 The proposal provides significant new public and private open space within the site, with a particular focus on the reimagining of Newcastle Place as a new pedestrianised space and destination within the wider area, providing a new key pedestrian and cycle route through from Edgware Road to Newcastle Place.
- 4.30 This is delivered through the proposed stopping up and partial pedestrianisation of Newcastle Place, which will ensure the delivery of the high quality landscape and public realm masterplan, which is based on prioritising access for pedestrians and cyclists, and limiting vehicular access for very limited servicing only, with vehicles entering from Edgware Road, travelling around the north elevation of the Westmark Tower (within West End Gate) and then existing onto Paddington Green. This will deliver a significant benefit to the local area, which is very car dominated and not easy for pedestrians and cyclists to negotiate, thus providing an oasis away from Edgware Road and Harrow Road.
- 4.31 The residential units all have balconies which acts as occupier's main private amenity space, in addition to public open space and play space provided around the site.
- 4.32 The public realm and landscaping strategy sets out the approach to providing valuable, high quality public amenity space, which is central to the proposed development, and

that tie in to the Council's wider ambitions for enhancements to the wider area as part of the Paddington Places initiative, and follows TfL's safer places work on the Edgware Road/Harrow Road junction.

- 4.33 The principal new public space is laid out with a linear landscape garden running east-west across Newcastle Place, with green lanes providing new pedestrian routes between the blocks into the site, and a considered mix of soft and hard surfaces. The public realm that borders the site is to be softened with new trees and planting that form a green halo around the site and culminates in the new plaza created on the corner of Edgware Road directly opposite the underground station, creating a sense of arrival to the site.
- 4.34 The main entrance to the whole Masterplan (including both WEG and the PGPS site) is off Edgware Road via Newcastle Place. This entrance is designed for vehicle (drop off and deliveries only around Westmark) and pedestrian access, however the design of the public realm has been developed with Newcastle Place between West End Gate and PGPS proposed as fully pedestrianised (except for emergency access). Vehicle movements around the controlled/limited route to the north of Westmark will only be for drop off and small deliveries only. The extent of soft landscaping has been maximised in this area in order to prioritise pedestrian movement.
- 4.35 The southern part of Edgware Road has already been substantially improved as part of the delivery of the initial stage of the WEG Masterplan which is to be continued with the planting of new trees and a water feature along with the opportunity for the retail and cafes to bring ground floor activation to this street frontage. Furthermore, the public realm will be managed by Berkeley's Estate Management Company to ensure the high quality public realm is maintained.

Public Art

- 4.36 It is proposed to retain an element of the existing public art that features as part of the Police Station building's façade at ground floor along Harrow Road, which is recognised as having local value. It is the intention that parts of this will be integrated into this third element of the Masterplan.

Play space

- 4.37 The Proposed Development includes a total of 840sqm of integrated play space provision for children of all age groups (for all tenures). The play space throughout the site is in addition to the space provided through site 1 and 2 of the WEG Masterplan. This is further described in the Landscape chapter of the DAS, and assessed in Section 7 below. There is however a shortfall in provision on site, due to the existing site's constraints, which will be mitigated through a financial contribution. Berkeley are in discussions with Westminster around how this contribution could be deployed in the local area to the benefit of the existing communities.

Commercial and Community uses

- 4.38 The development proposes 1,079 (GIA) of (flexible) non-residential uses falling within Use Class E, with active commercial uses across the ground floor including shops, cafes and other uses. A community use of 133 sqm (GIA) (Class F2) is provided at the western end of the site in Block I, fronting onto the public realm and garden space.

- 4.39 The commercial uses are proposed at ground floor level offer active frontages around the whole site, as shown below in Figure 4.2.

Figure 4.2: Proposed ground floor plan showing commercial floorspace



Car and cycle parking

- 4.40 The scheme has been designed to be a car free development, and as such it is not anticipated that there will be any significant residential car movement through the site. The stopping up and partial pedestrianisation of Newcastle Place will only permit controlled vehicular access for limited small scale servicing. The vast majority of servicing will take place through the WEG basement.
- 4.41 The proposals include 17 accessible car parking spaces as required by the London Plan, which are located within the basement level B1. Access to the car park is via the vehicle ramp which is entered via Church Street, and through the basement of the WEG development.
- 4.42 The majority of the proposed cycle parking provision is delivered on site in line with the London Plan providing short and long stay cycle parking for the commercial uses at ground floor level and within the basement levels, which is where the residents' cycle parking is located.
- 4.43 Cycle parking for each residential block is provided in excess of Westminster cycle parking requirements and the majority of the London Plan requirements. However, in order to fully meet the London Plan standards for residential spaces, 10% of these spaces will be placed with the basement of the WEG scheme which is outside of the red line of this application meaning there will be a temporary shortfall of 10% of the

residential cycle spaces until this change is secured by amending the WEG scheme, which will be submitted to WCC separately.

- 4.44 Cycle parking is located within secure storage facilities and all cycle stores are served by a suitable accessible lift, accessed from the ground floor of each block. Short stay spaces are also located in the landscaping at ground floor level, serving the retail and visitors to the office use. The total provision is shown in table 4.2 below.
- 4.45 TfL's position on Class E uses is that they will seek to apply the most stringent cycle parking standards, i.e. those which result in the most cycle parking and the least car parking. On this basis, all ground floor flexible commercial uses are considered to be A2-A5 retail (under former use classes) for a robust case in considering cycle provision.

Table 4.2: Proposed Cycle parking

Use	Short Stay	Long Stay
Residential	15	1004
Commercial	66	8
Total	81	1012

Materials and architectural treatment

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

Sustainability and Energy

- 4.48 An Energy Strategy and a Sustainability Statement have been prepared by Buro Happold and are submitted in support of this application. A low-carbon strategy has been implemented across the development. This includes highly insulated and airtight building fabric, energy efficient MEP systems and the provision of renewable sources such as ASHPs and PVs as part of an all electric strategy.
- 4.49 More generally the scheme is of a high quality sustainable design, incorporating active and passive measures to ensure the site delivers significant on site carbon reduction, and will be an efficient development going forward using high quality materials and systems to ensure a high quality residential and commercial environment is delivered. Sustainability measures including SUDS, low energy lighting, recycled content where

possible, responsible sourcing, rainwater harvesting, green roofs and significant planting and landscaping throughout the site.

4.50 All commercial areas of the Proposed Development are expected to achieve as a minimum a BREEAM 'Excellent' rating, and will achieve at least 66% on site carbon reduction, alongside a carbon offset payment to reach a carbon neutral position.

4.51 The energy strategy has been structured in accordance with GLA's energy hierarchy: Be Lean, Be Clean, Be Green. The proposals for the scheme have been developed in accordance with the desire to achieve an energy efficient and sustainable development. The Proposed Development will be designed to achieve optimum energy performance, and will incorporate the following design features:

- The building fabric will be designed following high end industry standards and best practice such as London Energy Transformation Initiative (LETI) as a response to the climate emergency.
- Passive design measures will be incorporated into the design to reduce energy demand and the risk of overheating.
- A high-performance building services solution is proposed for the Proposed Development.
- Located at basement and roof 3no. highly efficient Air Sourced Heat Pumps (ASHP) provide primary heating demand, 1 no. 4-pipe ASHP with heat recovery (heat recovery chiller) provides a portion of the cooling demand (35%) and heat harvesting, 1 no. Air-Cooled Chiller provides the remaining cooling load (65%) and
- 1 no. Water Source Heat Pump (WSHP) provides the heating capacity to match the heat recovery heat rejection for temperature elevation.
- All spaces will include 100% low energy lighting. Occupancy sensing will be specified throughout.
- 313sqm of PV are proposed on the roof of the three proposed buildings to contribute towards the on-site carbon reduction target of 66% and the overall Zero Carbon Target.

Waste and Servicing

4.52 All servicing will take place within the development, ensuring there will be no negative impact on the highways network and local environment. This will be done principally through the proposed connection to the WEG basement (for large scale servicing including waste collection, large scale deliveries), in addition to a small element of on street servicing on Newcastle Place, which is proposed to be stopped up, and will give controlled access to small delivery vehicles alone.

4.53 There will be significant on site management of all servicing and delivery activities, including by residential concierge services, and other building management staff during the building's operation.

- 4.54 Each individual residential unit would be provided with a segregated waste bin. The segregated waste bin would include sufficient individual receptacles to allow the segregation of the waste in accordance with the WCC Guidance.
- 4.55 Three residential waste storage areas would be provided at basement level in close proximity to each of the service cores. The waste storage areas located in the basement would be where all residential refuse, recyclable and food waste generated from the individual blocks would be stored prior to collection.
- 4.56 Sufficient space within each of the waste storage areas has been provided to accommodate the required number of refuse, recyclables and food waste containers assuming a weekly waste collection frequency.
- 4.57 Residents of Block I and J would be required to transport their own waste from their individual apartments directly to their local waste storage area using the residential passenger lifts.
- 4.58 The residential service core within Block K would contain a waste chute, which would allow residents to dispose of their waste at each floor level, that discharges into a waste chute room at basement level. It is proposed that the refuse waste stream from Block K would be compacted using a compactor that is incorporated into the chute at an assumed compact ratio of 2:1. Recycling waste and food waste would not be compacted. Suitable signage compliant with WCC requirements would be provided above the chute hopper on each floor to provide guidance on which materials can be recycled. The chute will feature integrated CCTV to police its use, ensuring residents are using it correctly.
- 4.59 On the collection day nominated by WCC the on-site FM team would transport the bins containing the waste or recyclables using an electric vehicle, to the waste presentation area at basement level via the car park access roads.
- 4.60 Waste generated within the 2022 amended proposed development would be collected in the waste waiting area located in basement level B2. The capacity of this waiting area is based on the bin storage requirements for Blocks I, J and K to allow the collection of the refuse, recyclables and food waste bins that would require presentation on a weekly basis. Waste generated within residential amenity space would be stored in domestic style waste containers/bins within the various amenity spaces. This waste would be regularly removed by the FM team as part of their daily cleaning activities and would be placed in Block K residential waste storage area for disposal.
- 4.61 The refuse storage spaces incorporate policy compliant recycling and waste facilities across the development and waste would be managed in accordance with the Proposed Development's Waste Strategy. Furthermore a Delivery Servicing Plan and Operational Waste Management Plan would be implemented. These measures together with the Applicant's commitment to encourage sustainable waste practices at the Proposed Development through BREEAM 'Excellent' accreditation would facilitate waste minimisation and recycling at the site.

Relationship to West End Gate Planning Permission

4.62 For the avoidance of doubt, the Proposed Development of PGPS relies on elements of the adjacent West End Gate scheme/planning permission for its delivery. As set out in this Planning Statement and in the associated submission documents, these links are:

- A physical connection at basement level between PGPS and WEG for the servicing of PGPS, which will take place in a consolidated way in the WEG basement, as well as the WEG basement to the PGPS parking spaces. Access to the basement for vehicles will continue to be from Church Street as consented for WEG.
- Connection to the WEG energy centre to provide power to the PGPS development, for future resilience.
- Provision of additional cycle parking spaces within the WEG basement, to make up the 10% shortfall of provision within the PGPS basement.
- At street level the servicing route along Newcastle Place is via the route to the north of Westmark.

4.63 In addition, by bringing PGPS into the wider West End Gate Masterplan it provides the opportunity for the public realm and landscaping strategy between WEG and PGPS, namely Newcastle Place to be revisited and enhanced. These series of linkages and revisions are shown on the submitted plans, and within the supporting application material.

4.64 A resultant amendment to the extant, implemented WEG planning permission will be made in due course (prior to commencement of PGPS) to formalise this relationship and linkage, namely to the basement level plans, and to the ground floor plan around Block A and B fronting onto Newcastle Place. Relevant planning conditions relating to landscaping (and others if appropriate) will also be re-discharged for WEG as appropriate, while WEG and PGPS will be linked via legal agreement as appropriate.

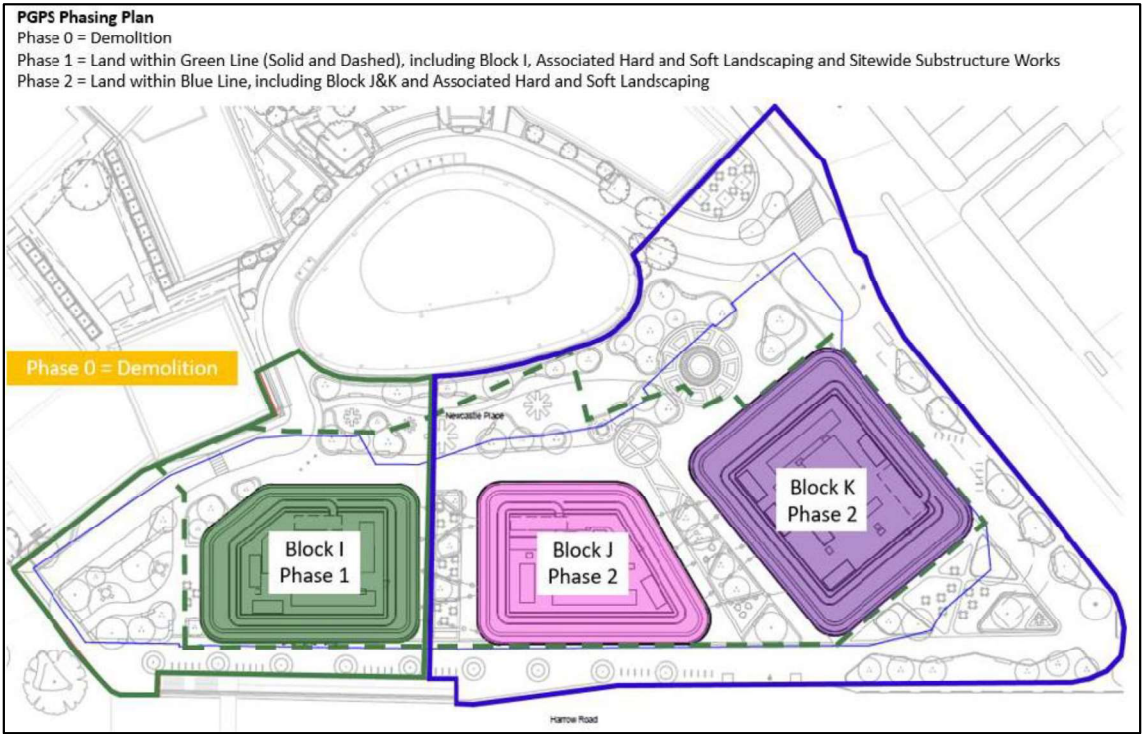
Phasing/Delivery

4.65 As set out above and illustrated in Figure 4.3 below, and also set out in detail in the accompanying ES, the development will be delivered on a phased/building by building basis.

4.66 As shown below at figure 4.3 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, Block K and associated hard and soft landscaping as Phase 2.

4.67 Please also refer to Chapter 8 of this Planning Statement for further considerations in relation to CIL, and to the ES for further details on the phasing and delivery of the development.

Figure 4.3 : Phasing plan



5. Pre-application Engagement

5.1 The proposed development has been subject to extensive and repeated rounds of public and stakeholder engagement ahead of the submission of the application. This section of the planning statement focuses on engagement with WCC officers, the Greater London Authority, and Transport for London. Specifically this section covers:

- Pre-application engagement prior to the submission of the April 2021 application.
- Westminster's major applications planning committee in September 2021.
- Subsequent engagement with the GLA and London Review Panel prior to the submission of this amendment, and associated public consultation.

5.2 The amended Statement of Community Involvement by Concilio that is submitted with this application sets out details of the three rounds of public consultation that have been undertaken through a range of platforms and engagement techniques to ensure public participation in the initial two rounds during the Covid-19 pandemic. The consultation strategy has included focused meetings, an online consultation website, webinars, and online feedback forms.

5.3 As set out in other parts of this Planning Statement, the redevelopment of Paddington Green Police Station has been envisaged since Berkeley acquired the neighbouring West End Gate site, with PGPS representing the final piece of the wider WEG development. This was articulated and set out as a Masterplan vision in the Design and Access Statement to the original West End Gate planning application, which was consented in April 2016. There has been therefore a long standing and publicised intention for the PGPS site to be redeveloped as part of the wider housing led regeneration Masterplan.

5.4 Initial discussions were held with WCC on an early concept for the redevelopment of the PGPS site in 2016, however formal discussions commenced with Westminster and the Greater London Authority (GLA) from 2019 onwards as detailed below.

Pre-application round 1 – Spring 2019

5.5 Formal pre-application engagement with WCC commenced in Spring 2019, followed by an initial meeting with the Greater London Authority. The scheme presented at that initial pre-application meeting comprised two towers of a similar architectural design to the existing Westmark tower (Block A) at neighbouring West End Gate, creating a cluster of three towers, with significant place making enhancements to Newcastle Place, Harrow Road and Edgware Road.

5.6 At lower levels there was a podium extending across the site providing commercial uses including ground floor retail and restaurant uses, community space, offices over the first and second floors, with residential above this. Two different massing options were presented, with a taller option (42 and 36 storeys) delivering 800 new homes including 35% on site affordable housing, or a lower option (28 and 26 storeys) delivering 550 homes including 35% on site affordable housing.

WCC feedback

- The principal of the redevelopment was supported, as was the residential provision including the 35% on site affordable housing provision. Clarification/confirmation was sought in relation to compliance with the Mayor's Affordable Housing SPG in relation to public land and the requirement for a portfolio agreement to be in place, ensuring that 50% affordable housing is delivered. The proposal was considered to be 'fast track' compliant on confirmation of the portfolio arrangement.
- The provision of commercial uses on site was also supported, and the loss of the existing police station/social and community use was highlighted as requiring justification in line with adopted policy.
- Both massing options were considered to be unacceptable in terms of their impact on the townscape, and in the context of draft City Plan policy at the time. The feedback stated that the proposal would need to be considered in light of all relevant considerations and relevant viewpoints.
- More slender tall elements of built form were identified as having the potential to create higher points of interest, and that the footprints of the two towers in this option were excessive and unacceptable.
- In addition, replicating the Westmark tower design was not supported, with variety and variation in architectural approach and façade design supported.
- Further comments were received around the townscape and animation of the ground floor in relation to the plinth/podium approach at the lower levels – and the need to provide more animation to the street scape.
- Substantially reduced car parking on site was supported.

GLA Feedback

- The GLA supported the principal of the high-density mixed use redevelopment of the brownfield site, in the context of the site's location within the Edgware Road Housing Zone, and its (then) allocation in the Westminster City Plan as a strategic site allocated for residential led mixed use development.
- The loss of the police/community use was also accepted given MOPAC's published estate strategy and long held intention to dispose of the site.
- The affordable housing provision was supported on the assumption that the proposal would deliver 35% affordable housing on site, with an agreement in place between the MPS and the Mayor to deliver 50% affordable housing across the portfolio of MPS sites, and as such is considered to be fast track compliant.
- The housing mix and choice was supported, and it was noted that the affordable housing mix should respond to the requirements of supporting the Church Street Estate Regeneration project, which is the intention.

- In design terms, the general layout principles of the site and relationship to WEG were supported, including the new pedestrian routes and public spaces, as was the intention to provide basement level parking and servicing.
- Officers were supportive of the proposed height of the scheme, including the 42 storey tower and second tower of the site, and the location of the taller buildings proposed. Likewise, consideration of the submitted townscape views concluded that the general scale and massing sits comfortably in the wider context, and will landmark the prominent junction and respond to the scale of Paddington Basin and the consented 'Cucumber' at 1 Merchant Square.
- Concern was raised in relation to the perception of bulk and risk of coalescence created. As such it was encouraged that alternative massing that reduced the breadth of building footprints be explored, to provide more slender buildings.
- Greater architectural variation between buildings was also encouraged, as was an emphasis on residential quality in terms of relevant standards and policy requirements, and meeting accessibility requirements set out in the building regulations.
- Comments repeated general policy requirements around energy and sustainability.

5.7 In summary both the GLA and WCC supported the principle of the residential led mixed-use redevelopment of the site, and its importance in delivering the wider Church Street regeneration. The level of affordable housing proposed was supported, as was the mix of uses proposed. Comments were raised in relation to the architectural approach, with both parties making similar points around the bulk of the two towers, and the need to introduce greater architectural variety. While the GLA fully supported the height proposed in both options, Westminster raised this as an issue of concern.

Pre-application Round 2 – February 2020

5.8 Following a period of review and consideration of the pre-application feedback received in 2019, a follow up high level pre-application meeting was held with WCC and the GLA in February 2020, which sought to set out the design response to the pre-application meeting 1 comments, and a direction of travel for the scheme.

5.9 A revised approach to delivering the site was presented in response to the feedback received relating to the bulk and footprint size of the two buildings initially presented. The new strategy presented was for a composition of three more slender buildings of varying form, with the tallest, more slender element located on the corner of Edgware Road and Harrow Road, with lower buildings within the site and towards Paddington Green. The proposal retained the plinth across the lower floors, and significant public realm and landscaping works to Newcastle Place and around the site.

5.10 The proposal was well received by both WCC and the GLA as a positive response to the comments raised through the first pre-application meeting. This formed the basis for detailed design development, to be presented at the third formal pre-application meeting.

Pre-application Round 3 – August 2020

- 5.11 The third round of pre-application entailed the presentation of the developed design of the revised design approach presented at pre-application meeting 2, as a direct response to the detailed comments received through the first pre-application meeting. Detailed analysis of the surrounding context in terms of existing and emerging building heights, key views, conservation and heritage designations, and key surrounding character areas was revisited and presented, in developing the revised proposals in detail.
- 5.12 The pre-app proposals comprised a greater emphasis on the ground floor and public realm through and around the site, delivering a group of three individual buildings with new public routes and greater permeability through and between these buildings, in addition to revised and comprehensive landscaping, planting and public realm strategy for Newcastle Place, in addition to Harrow Road and Edgware Road.
- 5.13 The proposal delivered 650 new homes including 40% on site affordable housing as a fast track compliant scheme, while retaining commercial uses at the ground to second floor of the buildings. Each building had a distinct architectural language, while retaining some elements of design consistency with West End Gate, comprising a taller, slender 39 storey building on the corner of Edgware Road and Harrow Road, stepping down to a 25 storey building fronting Paddington Green, with a shorter 14 storey mansion block between the two.
- 5.14 This proposal also formed the basis of the first round of public consultation, and was also used in briefing Ward Councillors, local residents associations and amenity societies and other key local stakeholders. The feedback to this initial public consultation is set out in the Statement of Community Involvement submitted with this application.

GLA Comments

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

WCC Comments

- Officers continued to raise concern with the massing of the two taller elements, namely the tall building on the corner of Edgware Road and Harrow Road, and the 'flatiron' building on the Paddington Green side of the site.
- Comments were received in the context of the City Council's emerging City Plan and policy on building heights. The Draft Plan (at the time) identified the site as a Key Development Site for residential led mixed use development. The plan also identified the site as being suitable for the location of a tall, slender building, while setting out contextual building heights for the surrounding area around the wider Edgware Road/Harrow Road junction.
- Given the stage of policy development and lack of weight in decision making, officers advised that the design should be focused on informing the design through analysis of townscape impact.
- Further comments were received on the design of Newcastle Place, building lines and further work to break up the massing of the buildings, in addition to the desire to explore the retention and potential re-use of some of the decorative panels on the Edgware Road frontage of the existing building.

Pre-Application Round 4 – November/December 2020

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

GLA Feedback

- Massing remains supported, concern was never about height, more about the coalescence with the existing West End Gate tower. Interventions and the re-alignment of blocks has successfully removed a lot of this concern.
- The facades are very high quality and have a positive impact on the townscape. Consider further variation between the facades of the three buildings. Very positive response to the flatiron building on Paddington Green, and is successful in the longer views.
- The view from Little Venice no longer shows issues of coalescence of massing, with more daylight showing between the blocks.
- Discussion was had around the off-site affordable housing provision and portfolio agreement with MOPAC.

WCC Feedback

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

Pre-Application Round 5 – February 2021

- 5.20 A further refined version of the reduced height scheme was presented to officers in February 2021, and also formed the basis of the second round of public consultation undertaken from late February onwards, as detailed in the Statement of Community Involvement by Concilio.
- 5.21 Officers confirmed the proposed viewpoints selected for the Townscape and Visual Impact Assessment, and provided no further comments on the proposed building heights, highways aspects, sustainability and energy, given comments already provided. Key WCC officer comments included:

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

Pre-application round 6 – March 2021

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

- Reiterated acceptance of the loss of the police station.

- Residential provision supported, as is the affordable housing provision and the tenure mix proposed.
- The unit mix as a whole was not supported due to under-provision of family sized housing (22% against 25% policy target), and that the large penthouse units were not supported and should be revised to be under 200 sqm.
- The housing quality proposed was supported, with further information requested on the proportion and nature of single aspect units.
- The provision of offices and active ground floor uses was supported, as is the affordable workspace.
- Comments were received in relation to daylight and sunlight, which acknowledged there will likely be losses to neighbouring buildings, including to Berkeley's adjacent West End Gate site.
- That the proposals represent less than substantial harm to certain identified heritage assets.
- Placeshaping comments were received in relation to the proposals for Newcastle Place, the underpass to Paddington, and the Edgware Road Junction, where all works are generally supported.
- Waste strategy comments were also received, which included push back on the inclusion of a waste chute within block K.
- Noise and air quality comments focussed on the positive incorporation of mitigation measures.
- Comments were also received in relation to public consultation and querying the extent and nature of comments received to date.

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

Further pre-application meetings

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

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

Westminster Policy, and the 'fast track' nature of the proposal was confirmed by officers.

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

- **Transport for London** – A focused pre-application meeting was undertaken with discussion around car and cycle parking, access, servicing, highways and movement around the site generally, healthy streets, application requirements and other relevant considerations.
- **Historic England** – HE were briefed but no feedback/comments were received prior to submission.
- **GLA Energy Team** – Feedback received on the energy strategy proposed (which is to link to the existing energy centre at West End Gate), decarbonisation in the longer term, and application submission requirements among other matters.
- **WCC Place Shaping Team** – Discussion over the public realm and highways works, and specifically the improvements to the Edgware Road/Harrow Road junction, the pedestrian underpasses and other considerations.
- **WCC construction Logistics and TfL** - Discussion with the construction officer regarding likely access and egress for demolition and construction of site, road closures, welfare locations and other general logistical discussions.
- **WCC highways** – As above, discussions regarding the stopping up of Newcastle Place have been held with Westminster on several occasions, setting out the justification and benefit to Westminster for doing so from a maintenance and cost perspective. This is balanced against the usage of Newcastle Place and the impact on the wider highways network, primarily to Church Street. This is set out in the Transport Assessment forming part of this application.

5.25 As set out in other parts of this statement, the wider stakeholder and public consultation process, including the activities and meetings undertaken, and detail of responses received in relation to the proposals is set out in an associated Statement of Community Engagement, undertaken by Concilio as part of the application.

5.26 The wider engagement process has included several rounds of focused meetings with recognised resident and amenity groups, meetings with Ward Councillors, webinar presentations, a live website with rolling/live response functions including a questionnaire and response form for ongoing feedback to be lodged, alongside promotion and advertising of the consultation through social media including Facebook, Twitter and LinkedIn.

2021 Westminster Planning Committee

- 5.27 The planning application submitted in April 2021 was considered at WCC Major Planning Committee on 7th September 2021. The Committee resolved to refuse planning permission, against the officer recommendation to grant planning permission.
- 5.28 The printed minutes set out the following reasons for refusal, as determined by Westminster's planning committee:
- By reason of its excessive height and bulk, Block K would have a detrimental impact on the local townscape, would result in substantial harm to the setting of the Little Venice, Paddington Green, Lisson Grove and Maida Vale Conservation Areas and have a detrimental impact on views from Regents Park and Hyde Park, contrary to policies 38, 39, 40 and 41 of the City Plan 2019 - 2040 (April 2021).
 - The proposed development fails to maximise the number of dual aspect flats within Blocks I and J, resulting in poor levels of natural daylight and outlook due to the proximity of the existing buildings within West End Gate. The proposal therefore fails to provide high quality residential accommodation and is contrary to policy D6 of the London Plan (March 2021) and policy 12 of the City Plan 2019-2040 (April 2021).
 - By reason of the excessive height and bulk of the proposed blocks, the proposed development would result in a significant loss of daylight and sunlight to existing residential properties, contrary to policies D6 (D) and D9 (3) of the London Plan (March 2021) and policies 7, 38 (C) and 41 B of the City Plan 2019 - 2040 (April 2021).

Mayor of London Stage 2 Referral

- 5.29 In November 2021, Jules Pipe (Deputy Mayor for Planning, Regeneration and Skills) directed that the Mayor will act as the local planning authority for the purposes of determining the above planning application. His reasons stated in the Stage 2 letter to WCC dated 21st November 2021 (Ref. 2021/0711/S2) are as follows:

a) The proposed development would have a significant impact on the implementation of the London Plan, as set out below and within the abovementioned report; and,

b) There are sound planning reasons for my intervention, as set out below and within the above-mentioned report.

- 5.30 The Stage 2 letter and accompanying report state that the proposed development has potential to make an important contribution to housing and affordable housing supply in response to London Plan Policies H1 and H4 and Good Growth Objective GG4. As such, the development is of a nature and scale that it would have a significant impact on the implementation of the London Plan.

GLA Engagement and Amendments to the 2021 Proposals

- 5.31 Following Westminster's planning committee in September 2021, a 12 month process of engagement and consultation has taken place with the GLA and their officers. This has also involved a two-stage process of engagement with the London Review Panel (LRP -

the Mayor's design review panel for London). This process of extensive engagement has resulted in a number of amendments being made to the original proposals submitted in April 2021, which have also been discussed with Westminster officers and Councillors.

5.32 Alterations have been made to deliver enhanced public benefits through the proposed development, with a focus on a number of strategic London Plan policy requirements, which can be summarised as follows:

- Increased on site Affordable Housing to 38% by habitable room (+1%) and improved provision with increased Social Rent tenure, from 49% by habitable room to 60% (exceeding WCC's current policy requiring 40%).
- Increased family sized homes within the Social Rented tenure.
- Better residential quality with removal of all north facing single aspect homes and 10% increase in dual aspect.
- Reduced daylight and sunlight impacts to neighbours
- Improved daylight and sunlight results and increased residential quality of proposed homes
- Improved design with fire strategy revised to meet emerging recommendations, with dual stair cores in every building
- Blocks slimmed to create greater distances between blocks and neighbouring blocks
- Heights reviewed and designed to provide better townscape cluster
- Podium removed, increasing north/south permeability through the scheme
- Improved energy strategy providing 66% reduction in carbon emissions, from policy compliant 35% reduction
- Better public realm for both residents and the local community with 53% increase from the previous scheme and significant enhancements
- Architectural and Landscape design revised and improved using GLA and LRP feedback
- Urban Greening Factor increased by 0.06 to 0.37
- Delivery of a new community space fronting onto a publicly accessible garden

5.33 These principles have formed the basis of discussions with the GLA over the last year, and have been subject to scrutiny and discussion through the LRP process, and have been delivered through discussions with the GLA and stakeholders on the following detailed matters:

Affordable Housing Provision

5.34 Following discussions with the GLA and also with Westminster's Political Leadership, the proposed affordable housing provision has been revised, focusing on the tenure split of homes and the unit mix in terms of unit sizes. For the avoidance of doubt, the proposal continues to deliver 556 new homes, including 38% affordable housing by habitable room.

5.35 The affordable housing tenure split has been revised, with a re-focus on social rented housing provision, which now represents 60% of the habitable rooms in the affordable housing (increased from 40% by habitable room). The focus and split of the affordable housing was previously the reverse of this and more focused on Intermediate Housing

provision in line with Westminster's adopted policies. As a result, the Intermediate Housing provision has been reduced to 40%. In addition to the shift towards social rented accommodation, a greater number of family sized social rented homes are proposed (2% increase), targeted towards local identified need.

Height, Bulk and Massing

- 5.36 The design development process over the last year, as set out in the Design and Access Statement submitted with this application included detailed optioneering of revisions to the height, bulk and massing of the buildings to deliver the enhanced public benefits set out above. Options explored the size, form and location of the footprints, and the associated heights of each of the three blocks, and to increase the distances between blocks to maximise the amount and quality of public realm, which also benefits residential quality within the development and mitigates amenity impact to neighbours, while retaining the 556 proposed new homes on site. These options and the final proposal are set out in the Design and Access Statement, showing the evolution from the previously submitted scheme.
- 5.37 Various options were explored, underpinned by extensive townscape, views and heritage impact analysis, and by extensive daylight and sunlight testing, all of which was presented to and discussed with GLA officers and the LRP, and subject to appropriate peer review. This has resulted in a number of key design moves to deliver enhanced public benefits and to resolve LRP comments around the approach taken to the principle tall building and completion of the tall building cluster on this key junction, which can be summarised as:
- The removal of the bullnose and shrinking of the building footprint of Block I, which increases to 24 storeys in height.
 - Removal of the link building between block J and K and removal of the office use from the development, creating a new public route and public realm between the blocks.
 - Reduction in the Block J footprint, and increase in height to 17 storeys.
 - Removal of the 25 storey 'shoulder' to Block K, significant reduction in the footprint of the building, and increase in height to 39 storeys.
 - Revisions to architectural approach and detailing, including greater articulation to the base, middle and top of Block K.

Residential Quality and Neighbouring Amenity Impact

- 5.38 Discussions with the GLA and the LRP also focused on enhancing residential quality within the development. The focus here has been to increase the proportion of dual aspect homes, increase the distance between blocks for greater privacy and to reduce overlooking, to deliver communal amenity space within the buildings themselves for residents alongside high quality play space within the development for both residents and the local community, as part of a significantly enhanced public realm and landscaping strategy. Importantly, the revised design includes two stair cores as part of the improvements to the fire strategy for the buildings.

- 5.39 Alongside this, the revisions to the height, bulk and massing improves the daylight/sunlight impact on neighbours, and the overshadowing of the new public realm and public amenity areas and play spaces.

Energy and Sustainability

- 5.40 A key objective of the GLA discussions has been to enhance and revise the energy strategy and to improve the sustainability credentials of the development. This revolves around a new ASHP focused strategy (while still linking to the neighbouring West End Gate energy centre for resilience purposes only), and fabric first enhancements such as revisions to the solid to glazing ratio and 10% fabric efficiency, to deliver a 66% on site carbon reduction against Part L.

Landscaping and Public Realm

- 5.41 As set out above, the GLA and the LRP have driven significant enhancements to the quantum, design and quality of the public realm and landscaping at the site, with the revisions delivering a 53% increase in the area of public realm delivered through the proposed development, delivered through the revisions to the design of the buildings as summarised above.
- 5.42 Again, a significant number of options were tested to deliver a significant increase in the quantum and quality of public realm, while ensuring it is usable and of a character that is fitting for the site and its potential users. This has included the creation of new public realm and links between block J and K through the removal of the office link element, the creation of a new public garden at the western end of the site adjacent to Paddington Green delivered by a significant reduction in the footprint of Block I, a new approach to the design of the plaza on the corner of Edgware Road and Harrow Road alongside more generous proportions. And focally, a fundamental revision to the proposals for Newcastle Place, with the carriageway partially removed to create a pedestrianised, high quality landscaped space including play space.

London Review Panel (DRP) Summary

- 5.43 As set out above, the development proposals have been subject to two rounds of review by the London Review Panel (the Mayor's Design Advocates) over the Spring and Summer of 2022. The final report dated August 2022 provides comments on four principle matters as summarised below, and which are based on the panel's review of the range of design options that resulted from discussions with GLA officers, as summarised in the Design and Access Statement.
- 5.44 The feedback from the final LRP report covered summary feedback in relation to height and massing, cluster and architecture, landscape and play space, and residential quality, with key points summarised below:

Height and massing

- The LRP noted the viability challenges informing and determining the amount of massing proposed on the site.

- The panel agreed that of the options presented, the taller Block K at 39 storeys was the preferred option, and noted the coherent justification for taller buildings on the site.
- The panel agreed that the removal of the podium between block J and K is beneficial for the public realm, and that the increased gap between the blocks helps the overall composition.
- The panel advised the team to maximise the differentiation in heights and architectural expression to avoid a clustering of similar height buildings creating a mass when viewed from key positions.

Cluster and Architecture

- The panel advised the team to look to articulate the elevations to emphasise slenderness, to develop the depth of the elevations, and to differentiate clear lower, middle and crown portions to carve up the height of the tall building.
- The panel also advised a more heavily modelled base at ground level where it faces the street with a more civic design.
- The panel encouraged the avoidance of a generic design response to the architecture, and to use a language which is specific to this location, and to ensure the three buildings read as a family and avoiding competition with Westmark.

Landscaping and Play Space

- The panel supported the revised ground floor plan and appreciated the amount of public realm being created, alongside the much more successful central green space of Newcastle Place.
- The panel agreed that all pockets of landscape now have more identity and that the distribution of space is more successful.
- Comments were also received on the location and nature of the community space relative to the public realm.
- The panel encouraged the landscaping approach to avoid being formal, embracing the gritty and naturalistic approach – noting that the urban forest approach with low level planting and higher-level tree canopy is one appropriate response.
- It was also recommended to avoid the installation of too much street furniture or other hard landscape features

Residential Quality

- The reduction in the number of single aspect homes was well received, and the panel encouraged that a minimum of 60% of homes should be dual aspect.
- The panel acknowledged the inclusion of residential storage and encouraged the emphasis of this space should be for family homes.
- The panel encouraged the consideration of the re-inclusion of a roof garden to the social rented block.

Public and Stakeholder Engagement on Amended Proposals

- 5.45 The GLA engagement has been accompanied by consultation undertaken with local stakeholders including local amenity societies, and a general public consultation process

involving a public exhibition, online webinars, an updated consultation website and other engagement. This is set out in detail, including the details of attendance and interest in the consultation, in the accompanying SCI by Concilio.

5.46 To summarise, the public consultation has included:

- Launching publicly on 19th October, with nearly 8,000 flyers delivered locally.
- Meetings or offer of meetings with Ward Councillors for Little Venice, Hyde Park, Church Street wards.
- Meetings or offers of meetings with nine local amenity and resident associations, and the local MP's.
- Consultation website launched in mid-October, including on line survey.
- Virtual webinar held on the 25th October.
- Public Exhibition held on site at West End Gate on the 1st November.

5.47 Similarly to the original 2021 planning application (which attracted only circa 20 formal consultation responses on the planning application), the level of public interest in the extensive consultation and multi-channel engagement to date has been very low, with a number of the local resident and amenity groups not taking up the offer of a meeting, while the public consultation on site was attended by 18 local stakeholders, and online webinar was attended by only 5 people. In addition, an online survey on the consultation website (which remains live) was completed by only 18 people. As such, interest in the consultation has been low, continuing the trend seen with the 2021 application. However, the responses received have been carefully logged and considered as set out in the SCI.

6. Planning Policy Context

- 6.1 This chapter sets out the relevant planning policy context against which the proposals for the site will be assessed.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. This section sets out the relevant Development Plan and other material considerations that are relevant to the site and the Proposed Development.

The Relevant Development Plan

- 6.3 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the development plan unless material considerations indicate otherwise. The development plan for Westminster consists of:
- The London Plan (March 2021)
 - Westminster City Plan 2019 - 2040 (April 2021)
 - Westminster Proposals map (April 2021)
- 6.4 It should be noted that Westminster is currently undertaking a partial review of its City Plan, and is currently undertaking an initial Regulation 18 Consultation on potential areas of policy revision. The progress of this partial Plan revision will be monitored during the course of determination.

Material considerations

- 6.5 In addition, national policy and guidance consists of:
- The National Planning Policy Framework (NPPF), updated July 2021.
 - National Planning Practice Guidance (last updated August 2022).
 - Associated Mayor of London SPG's and Westminster SPD's.
- 6.6 The NPPF contains the golden thread of the presumption in favour of sustainable development, both in terms of plan making and decision making. Key changes to the NPPF adopted in 2021 revolve around the need for developments to deliver 'beautiful' design. Key focuses of the NPPF continue to be around supporting housing delivery and the provision of affordable housing, with an expectation for delivery to be on site (Chapter 5).
- 6.7 A key element of the NPPF is making effective use of land, including brownfield land and under-utilised land and buildings (Chapter 11).

- 6.8 Further chapters of the NPPF aim to build a strong and competitive economy (Chapter 6), and also to ensure the vitality of town centres (Chapter 7), taking a positive approach to their growth, management and adaptation.

Westminster Supplementary Planning Guidance / Documents

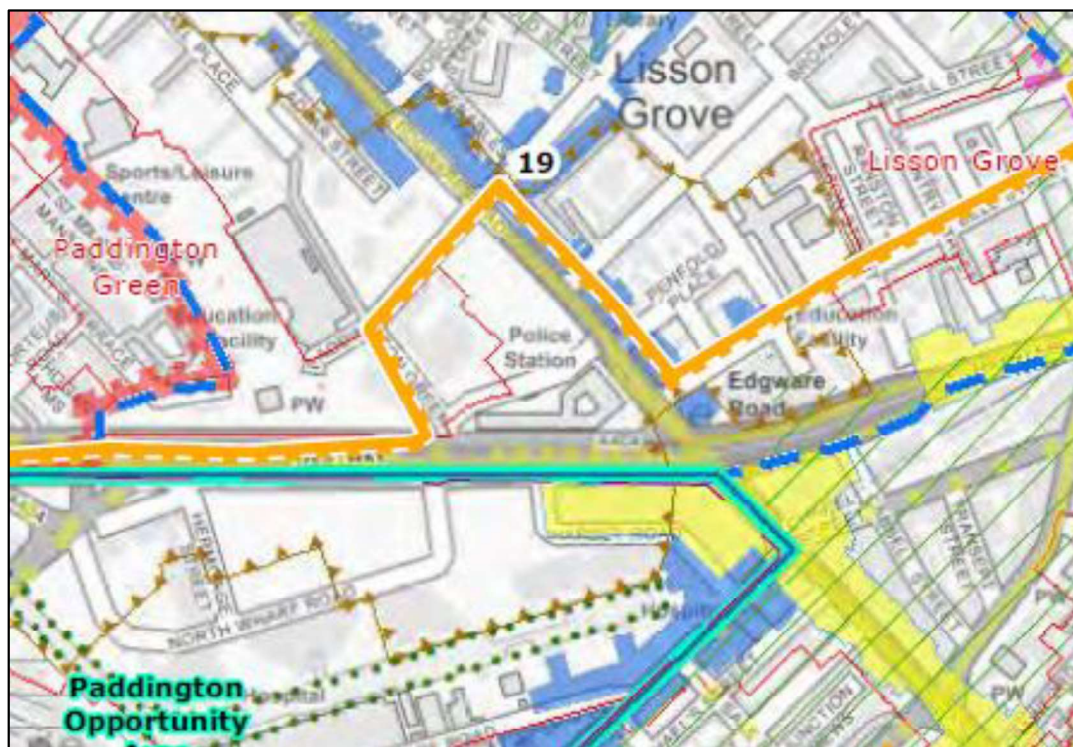
- 6.9 Westminster has also set out its intention to publish and develop a number of Supplementary Planning Documents (SPD's) and Development Plan Documents (DPD's), however this remains under review. A Site Allocations DPD's and Planning Obligations and Affordable Housing DPD were published for consultation in 2022, however their adoption is not expected in the near future given the partial local plan review currently being undertaken.
- 6.10 Relevant adopted SPD's at the Westminster level include the Environment SPD (April 2022), and the Paddington Green Conservation Area Audit (2003).

GLA Supplementary Planning Guidance / Documents

- 6.11 The following guidance documents are also material considerations for the proposal:
- Mayor of London's Housing SPG (2016).
 - Mayor of London's Affordable Housing and Development Viability SPG (2017).
 - Mayor of London CAZ SPG (March 2016).
 - Mayor of London Accessible London SPG (October 2014).
 - Mayor of London Social Infrastructure SPG (May 2015).
 - Mayor of London Sustainable Design and Construction (April 2014).
 - Mayor of London Play and Informal Recreation (September 2012).
 - Mayor of London Character and Context SPG (June 2014)
 - London View Management Framework SPG (March 2012).
 - Mayor of London Be Seen energy monitoring LPG (September 2021).
 - Mayor of London Circular economy statements LPG (March 2022).
 - Mayor of London Energy Planning Guidance (April 2020).
 - Mayor of London The control of dust and emissions in construction SPG (July 2014).
 - Mayor of London Whole life carbon LPG (March 2022).
 - Mayor of London The Public London Charter LPG (September 2021).
 - Paddington Green Conservation Area Audit, and other relevant CA Audits.
- 6.12 A number of Mayoral SPG's are being developed in support the new London Plan and have undergone consultation, but are yet to be adopted, including on the following topics:
- Optimising Site Capacity: A Design-led Approach
 - Characterisation and Growth Strategy
 - Housing Design Standards
 - Fire Safety
 - Urban greening factor
 - Air Quality neutral
 - Air quality Positive
 - Sustainable Transport, Walking and Cycling

6.13 The site falls under the following Local Plan spatial policy designations in adopted proposals map, as illustrated below on Westminster's Proposals Map (April 2021):

- ### Figure 6.1 Proposals Map Extract



London Plan 2021

- Policy GG1 - Building strong and inclusive communities
- Policy GG2 - Making the best use of land
- Policy GG3 - Creating a healthy city
- Policy GG4 - Delivering the homes Londoners need
- Policy GG5 - Growing a good economy
- Policy GG6 - Increasing efficiency and resilience
- Policy SD4 - The Central Activities Zone (CAZ)
- Policy SD5 - Offices, other strategic functions and residential development in the CAZ
- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D6 - Housing quality and standards

- Policy D7 - Accessible housing
- Policy D8 - Public realm
- Policy D9 - Tall buildings
- Policy D10 - Basement development
- Policy D12 - Fire safety
- Policy D13 - Agent of Change
- Policy D14 - Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H10 - Housing size mix
- Policy S1 - Developing London's social infrastructure
- Policy S4 - Play and informal recreation
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E9 - Retail, markets and hot food takeaways
- Policy HC1 – Heritage conservation and growth
- Policy HC3 - Strategic and Local Views
- Policy HC4 - London View Management Framework
- Policy HC6 - Supporting the night-time economy
- Policy G1 - Green infrastructure
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 – Biodiversity and access to nature
- Policy G7 – Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 – Minimising greenhouse gas emissions
- Policy SI 3 – Energy Infrastructure
- Policy SI 4 – Managing heat risk
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 13 - Sustainable drainage
- Policy T2 - Healthy Streets
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 - Residential parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T9 - Funding transport infrastructure through planning

Westminster City Plan – April 2021

- Policy 1 - Westminster's spatial strategy
- Policy 6 - Spatial Development Priorities: Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas
- Policy 7 - Managing development for Westminster's people

- Policy 8 - Housing Delivery
- Policy 9 - Affordable housing
- Policy 10 - Housing for specific groups
- Policy 12 - Housing quality
- Policy 17 - Community infrastructure and facilities
- Policy 24 - Sustainable transport
- Policy 25 - Walking and cycling
- Policy 26 - Public transport and infrastructure
- Policy 27 - Parking
- Policy 28 - Highway access and management
- Policy 29 – Freight and servicing
- Policy 30 - Technological innovation in transport
- Policy 32 - Air quality
- Policy 33 - Local environmental impacts
- Policy 34 - Green infrastructure
- Policy 36 - Energy
- Policy 37 - Waste management
- Policy 38 - Design principles
- Policy 39 – Westminster's Heritage
- Policy 40 - Townscape and architecture
- Policy 43 - Public realm
- Policy 45 - Basement developments

7. Planning Policy Considerations

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

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

Principle of redevelopment

- 7.2 At the heart of the National Planning Policy Framework and National Planning Practice Guidance is the presumption in favour of sustainable development (Paragraph 11, NPPF) which states that consent should be granted ‘without delay’ where proposals accord with the Development Plan. Furthermore, the NPPF states that planning policies and decisions should *‘promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions’* (Paragraph 117).
- 7.3 The proposals for this third site within the West End Gate Masterplan meet key strategic objectives around place making in this part of the city, housing delivery and economic development, in line with aspirations set out for this site of strategic importance for the delivery of the London Plan and Westminster’s City Plan.
- 7.4 The principle of the residential led redevelopment of the site is accepted and strongly supported by the Mayor of London and Westminster as established through the formal pre-application process. The loss of the previous Police Station function has also been accepted by Westminster and the GLA, given the decommissioning of the station and its disposal as part of MOPAC’s wider estate strategy, which is further detailed below. The disposal of this surplus site to Berkeley ensures that the re-purposing of the site will be a swift process, ensuring that the future use will make a significant and positive contribution to the local area and Westminster more generally.
- 7.5 The site is located in a unique and pivotal location for the delivery of strategic priorities, being located in the Central Activities Zone, being identified as a key brownfield development site in the housing trajectory within the Church Street / Edgware Road Housing Renewal Area and the Edgware Road Housing Zone.
- 7.6 The site is in a heavily developed area of central London with excellent access to public transport and services. The existing buildings, which are proposed to be demolished, have been largely vacated by the Metropolitan Police since 2018, now only being occupied by a small element of lawful office use (refer to Planning History section). The site is therefore considered to be a severely underutilised key brownfield site, suitable for high density, mixed use development in accordance with Policy GG2 ‘Making the best use of land’ of the London Plan and Policy 1 ‘Westminster’s spatial strategy’ of Westminster City Plan.
- 7.7 The principle demolition of the existing buildings has been agreed with officers to comprehensively redevelop and optimise the site’s capacity and public benefits, and for the beneficial removal of the detracting existing buildings on site. The housing delivery led proposals will make a strategically significant contribution to the strategic and spatial priorities set out in the London Plan and Westminster City Plan as set out in this statement and in the wider planning application documentation.
- 7.8 The application site is an underutilised, brownfield site and is therefore of strategic importance for housing delivery. At a local level, the site is located within the Church Street and Edgware Road Housing Renewal Area. The proposed redevelopment to provide flexible commercial space, market and affordable housing aligns with the London Plan Good Growth Objectives GG1, GG2 and GG4, which promote building

strong and inclusive communities, optimal redevelopment of brownfield sites and delivering housing for all Londoners.

Loss of Existing Police Station Use

- 7.9 As set out earlier in this statement, and in the Design and Access Statement and existing plans, the existing site was completed in 1971 and from this time has housed a unique mix of uses not typical to a standard police station. This reflects the unique function of the station, which served as the most important high-security station in the UK, in addition to housing emergency response teams covering Westminster and wider boroughs, a front of house station presence, and a number of desk based administrative and specialist policing services (e.g. road traffic incident team, forensic services administrative functions etc).
- 7.10 As is public knowledge, the station housed specialist custody cells for potential and known terrorism suspects. It therefore had a much wider function beyond being a front of house neighbourhood police station. In land use terms, it is considered by Westminster to be a Sui Generis use, having housed the front of house police station and associated policing functions, a majority of which were desk based, reflecting the office fit out of much of the site, alongside the accommodation/section house building. The 'Annex' part of the site at the western end is lawfully occupied Class E office space, following a change of use application consented recently on behalf of the applicant (refer to Planning History section).
- 7.11 More fundamentally, the site has been decommissioned and disposed of as part of the MOPAC's estate strategy. The Police & Crime Plan 2017-2021 commits to investment in the tools that police officers need to do their jobs, and invest in core buildings to create a modern environment for staff and the public.
- 7.12 In support of that objective, the disposal of surplus properties is set out to generate capital receipts in support of the wider capital programme. A number of properties were identified for disposal in 2018/2019, which included the Paddington Green Police Station. This is documented in publicly available papers and reports through the GLA and MOPAC websites.
- 7.13 As part of the disposal of PGPS, the front counter and Dedicated Ward Officers located at Paddington Green were re-located to a new facility on adjacent Church Street by June 2018. At this point, PGPS contained no public facing functions and the building was effectively vacated. From that point until the exchange/sale of the building to Berkeley in 2020, the MET Police used the site sporadically for parking and logistical functions in support of significant events policing, firearms training and other ad hoc activities.
- 7.14 Planning permission was granted in December 2017 under application ref. 17/07447/FULL for the creation of a Neighbourhood Policing Hub (Sui Generis Use Class) at 80A and 88 Church Street, a short distance from the existing Paddington Green Police Station. As such this local policing function has not been lost from the local area. This counter service opened in the summer of 2018, relocating the operational front counter from Paddington Green to this new location, ensuring this valuable social and community use was re-provided in the direct vicinity of its previous location, in a more fit for purpose bespoke facility at the heart of the neighbourhood's main commercial

shopping centre on Church Street. Although this counter service was subsequently closed by the Police, a safer neighbourhoods team remains serving the Church Street area.

- 7.15 The other functions previously housed at Paddington Green were relocated to other parts of the Metropolitan Police Estate. Many of the services had a pan-London focus or function, and did not just serve the City of Westminster. This was the case for the section house accommodation (alternative accommodation is available at the Gilmore Section House in Kennington), the pan-London and national services including the Territorial Support Group, the Road Traffic Investigation Unit, and other general administrative and management functions – which relocated to appropriate space in other police stations and office buildings across the Metropolitan Police Estate.
- 7.16 None of these services have been lost, and they continue to function and serve the City as they previously did when they were housed at Paddington Green. the relocation and consolidation of these functions was as part of the Metropolitan Police’s established estate strategy and the proposed redevelopment is a response to this wider decision
- 7.17 Policy 17 of the Westminster City Plan seeks to protect existing community facilities and floorspace other than where it can be demonstrated that the loss or relocation is necessary to enable service provision to be reconfigured, consolidated, upgraded, or delivered more effectively as part of a published strategy to improve services and meet identified needs. This requirement is clearly met as set out above, with the loss of the Police Station being enshrined in the wider MOPAC estate strategy, in hand with the relocation of all existing functions to either neighbouring sites in Church Street or across the wider London portfolio, which is in fitting with the London-wide catchment of many of the services previously housed at PGPS.
- 7.18 This policy approach is also encapsulated in the London Plan under policy S1 Developing London’s social infrastructure, specifically part F, which refers to re-provision of social uses and loss as a part of a wider published estate strategy.
- 7.19 The existing site does not lend itself to re-use without redevelopment, given its purpose built, high security nature, and would also require a change of use given the Sui Generis nature of much of the site. The development proposal also includes a new community use for the local community.

Principle of Residential Use and Contribution to Housing Delivery

- 7.20 There is a clear policy requirement at a national, regional and local level to provide new housing. The NPPF states that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. This is to support the Government’s objective of significantly boosting the supply of homes.
- 7.21 London Plan Policy H1 ‘Increasing housing supply’ seeks to increase the supply of housing and sets the ten-year target for Westminster (within Table 4.1) at 9,850 homes. The policy requires sites with the potential for housing delivery to be optimised, especially

those that are very well connected, and the redevelopment of surplus public sector owned sites, such as the PGPS site.

- 7.22 Policy GG2 of the London Plan seeks to create successful sustainable mixed-use places that make the best use of land. The policy sets out for appropriate land to be proactively intensified to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 7.23 The provision of residential accommodation is strongly supported by policy 8 Housing Delivery in the City Plan, which seeks to increase the supply of good quality housing to meet Westminster's housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs.
- 7.24 With the site being within the Church Street / Edgware Road Housing Renewal Area, the proposed 556 new homes will greatly assist in meeting Policy 6 'Spatial Development Priorities: Church Street / Edgware Road' ambitions of creating at least 2,000 high quality new homes in this area, as well as meeting the objectives of Policy 8 'Housing delivery' which seeks to exceed the London Plan target and create 9,850 new homes over the London Plan ten year period, or an annual target of 985 new homes per year.
- 7.25 The site is very well located, with exceptional access to public transport, local services and amenities. A key planning benefit of the redevelopment of this site is that it intensifies and optimises the use of brownfield land to support the delivery of a strategically significant quantum of new homes, and complementary uses, and promotes higher density development. The proposals would deliver 556 new homes, which is a significant contribution to the above housing targets, representing 56% of a single year of housing delivery in Westminster, and 5.6% of the ten year target through this single site, making it of strategic importance.
- 7.26 In the context of the Council's recent underperformance against the London Plan targets, and also considering London's overall housing need, the proposed development would significantly contribute towards the delivery of housing, in line with London Plan Policy H1.
- 7.27 Delivery of this scale in Westminster is very rare, particularly when led by the private sector in recent times. A majority of the sites that are earmarked for significant housing delivery in Westminster are Council owned sites within the identified Housing Renewal Areas, or relate to public sector land. As such, PGPS is unique in terms of its scale of delivery, as WEG has been before it.

Principle of flexible commercial space (Class E) and loss of office use

- 7.28 1,079sqm (GIA) of flexible commercial space is proposed at ground floor across the three blocks. This will be through the delivery of 10 x flexible commercial units of varying sizes, all of which will fall within Use Class E.
- 7.29 The flexible nature of these units will also accommodate a range of diverse units which are appropriate to the area in accordance with Policy E9 'Retail, markets and hot food

takeaways' of the London Plan and Policy 16 'Food, drink and entertainment' of the City Plan.

- 7.30 This new commercial floorspace within the CAZ, including a range of unit sizes, all of which will have active ground floor frontages on all elevations which will serve the local community is supported within Local Plan Policy 14 'Town centres, high streets and the CAZ', while creating additional employment opportunities.
- 7.31 Use Class 'E' supports a range of uses however, it is proposed for the use of the ground floor flexible commercial units to include retail, café/restaurants, offices and professional services open to visiting members of the public where appropriate.
- 7.32 It is agreed (as per the consented change of use to office application relating to the annex part of the site) that some of the uses falling within Class E would not be suitable in this location namely crèche, day nursery, day centre or large supermarket. These could have negative impacts on the site and surrounding area and should be excluded from being permitted within this area. This can be secured via an appropriately worded condition.
- 7.33 The inclusion of additional E-class units will complement the town centre uses being delivered along Edgware Road as part of the West End Gate development, and complement the adjacent Church Street/Edgware Road District Shopping Centre. The proposed units will provide ground floor activity, drawing people into and through the PGPS site, creating job opportunities and providing local services in line with the policies set out above.
- 7.34 The original submission version of the planning application heard at Westminster planning committee included office space at the first floor of Block J, and two floors of office accommodation in Block K, with a bespoke office entrance between these two blocks. This office space has been removed from the proposed development following discussions with the GLA and as part of the re-design of the buildings, and the existing lawful office located in the Annex building on site is not re-provided as part of this revision. The revised proposals however include a significant amount of Class E floorspace as set out in this section, providing replacement commercial and employment space at the site, prioritising the activation of the ground floor and potential for local services to be provided.

Provision of Community Use

- 7.35 The revised proposal includes the provision of a defined community use (Class F2), located in the ground floor of Block I fronting the newly proposed public garden space facing onto Paddington Green. The parameters of the occupation and operation of this space will be defined in the S106 agreement accompanying this application to ensure it appropriately serves the local community. This represents a further public benefit in line with Westminster City Plan policy 17 Community Infrastructure and Facilities.

Affordable Housing Provision

- 7.36 The Proposed Development will make a significant contribution to affordable housing delivery and addressing housing need, in line with the ambitions of the London Plan and Westminster's City Plan. The applicant proposes to deliver 39% of units (219 units) (38%

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

- 7.37 The proposed development delivers a range of unit typologies in which 39% of these are affordable by unit, which exceeds the 35% target (by all relevant metrics - unit, habitable room, and floor space) as set out in the London Plan and Policy 9 'Affordable housing' of the Westminster City Plan.
- 7.38 Officers have confirmed through the original submission and pre-application process that the Proposed Development qualifies for the 'Fast Track Route' as set out in the London Plan threshold approach to applications under policy H5, and elaborated on in the associated Affordable Housing and Viability SPG (2017). The London Plan Policy (H5) requires public sector land to achieve 50% affordable housing, however there are additional provisions where there is an established portfolio agreement between the public sector body and the Mayor. This is the case for MOPAC, who have an established portfolio agreement with the Mayor, which will ensure they deliver 50% affordable housing across the portfolio as a minimum.
- 7.39 MOPAC's established portfolio agreement that is in place with the Mayor has been shared with Westminster Council, which requires 35% of the first 451 homes delivered on the PGPS site to be affordable, with then 50% of any additional homes beyond the 451 number to be affordable (as per the proposed provision set out in this Statement). Beyond the PGPS site, 68 additional affordable homes are then to be provided at the MOPAC Colindale site in LB Barnet (in addition to the Colindale site's affordable housing requirement), meeting the London Plan policy on 50% affordable housing provision on public land across this identified portfolio of sites in line with London Plan Policy H4 'delivering affordable housing' of the London Plan. As set out below, the applicant are working to secure nomination rights for Westminster residents on the additional 68 affordable homes being delivered in Colindale to provide a further benefit to Westminster.
- 7.40 Local plan policy then states that the 35% threshold then applies to individual sites within the portfolio as set out in Policy H5, the associated SPG, and the supporting text to Policy H5. As such, the Proposed Development is fully compliant with the London Plan and Westminster's City Plan with regards to the quantum of on-site affordable housing being proposed, which is in fact in excess of the site specific 35% planning policy threshold and site specific requirement of the portfolio agreement, standing at 39% on site provision, and providing a significant public benefit.
- 7.41 The provision of 219 affordable homes, would contribute towards both the Mayor's strategic target of 43,500 affordable homes per year, as well as the Council's strategic target of 345 affordable homes per year, in line with London Plan Policy H4. The proposed development would be equivalent to 0.5% of London's annual affordable housing need, which is not considered to be an insignificant amount on a singular, relatively modest sized site. At a local scale, the proposed affordable housing offer would equate to 63% of Westminster's annual affordable housing target and would make a significant contribution towards the targets set out in London Plan Policy H4.

7.42 GLA openstore data demonstrates that within 2022 there have been 0 affordable housing starts in Westminster (up to June), whilst in 2021 there were 431 affordable homes starting construction but only 252 affordable homes completed. DLUHC Affordable housing supply statistics (AHS 2020-21) demonstrates that in 2021 only 128 of these starts were social rented homes.

7.43 Having regard to the above, and the significant London-wide shortfall against the minimum strategic affordable housing targets, the proposed development has the potential to make a substantial and positive contribution towards achieving local and strategic housing and affordable housing targets set out in the London Plan, most notably in contributing to social rented housing delivery, through optimisation of an underutilised brownfield site.

Affordable Tenure Split and Unit Mix

7.44 It is proposed for 60% of the affordable units to be social rented and 40% to be intermediate by habitable room, a revision resulting from discussions with the GLA and also with Westminster's new administration, which again accords with the planning policy provisions set out in Policy H6 'Affordable housing tenure' of the London Plan and with Westminster's emerging policy direction.

7.45 The mix has been developed in close consultation with the GLA, both in terms of the overall tenure split, and then the detailed unit mix within those tenures, to meet identified local need. The London Plan under policy H6 requires a minimum of 30% low-cost rented homes (either London Affordable Rent or Social Rent), a minimum of 40% intermediate products that are genuinely affordable (such as London Living Rent and London Shared Ownership), with the remaining 40% to be determined locally by boroughs based on identified need.

7.46 Beyond the tenure mix policy requirement set out above, there is no absolute policy requirement around the precise housing mix within this (in terms of number of bedrooms etc). However this is a point of importance for the City Council as established in discussions with the GLA and with Westminster's affordable team, and as such the proposed mix has been developed to reflect local need in the Church Street area. This level of detailed engagement has also informed the strategy in relation to wheelchair accessible units, given Westminster's need for the larger social rented units to be wheelchair accessible, again driven by local need. The proposed housing mix within the affordable tenures has sought to respond specifically to local need to provide the greatest benefit possible to the local area based on discussions with the GLA and Westminster.

7.47 Westminster's City Plan sets out the local requirement to deliver 60% Intermediate housing, and 40% Social Rent or London Affordable Rent, as set out also within Policy 9 of the City Plan. However, following discussions with the GLA, and following the election of a new administration at Westminster City Council in May 2022, the tenure split has been revised, with a re-focus on social rented housing provision in line with the administrations priorities, which now represents 60% of the habitable rooms in the affordable housing.

7.48 Please refer to Appendix 5 (and below under 7.58) for a full breakdown of the accommodation schedule. This sets out the full tenure mix between Intermediate and

Social Rented, which has been developed and refined in close consultation with Westminster and the GLA, providing a significant number of family sized homes within the Social Rented tenure, and conversely a mix of one and two bedroom units within the Intermediate tenure.

- 7.49 All affordable rented homes are to be delivered as social rented homes, with none proposed as the less affordable London Affordable Rent (LAR) tenure. Within the proposed Intermediate homes, all Manhattan (Studio) and 1-bed homes are proposed as Shared Ownership or Intermediate Rent units (in line with the definitions in GLA policy), with all 2-bed units proposed as Intermediate Rented units.
- 7.50 As such, the quantum of on-site affordable housing provision at PGPS is fully policy compliant in line with the London Plan and Westminster City Plan, having regard to the MOPAC agreement, providing 39% affordable housing by unit (38% by habitable room) with the tenure split and unit mix developed to reflect local need.
- 7.51 Like West End Gate, the public benefits are further accentuated by the key role that PGPS will play in delivering the Council's Church Street Masterplan. As with West End Gate, the delivery of affordable housing by Berkeley is a key pre-cursor and facilitator for the delivery of Church Street Masterplan, providing new high quality affordable homes for current Church Street residents to move into. This will then free up sites within Church Street, facilitating their redevelopment, as has already been the case with West End Gate and the affordable homes that have been delivered for Westminster to date.

Additionality - Off-site Affordable Housing Nomination Rights

- 7.52 The potential additional public benefit to Westminster associated with the portfolio agreement and off site provision away from PGPS relates to two MOPAC sites in Colindale. For the first 3 months of marketing of the Colindale sites it may be possible for priority to be given to applicants that live and /or work in Westminster or Barnet in relation to the additional 10% intermediate homes delivered in Colindale to satisfy the Portfolio agreement requirements i.e. those beyond the first 50% of affordable housing on the Colindale sites. It is likely these additional homes will be shared ownership. This 10% equates to approximately 68 homes. The timing of the delivery of these homes is to be determined, as is the detail of the potential nominations agreement.
- 7.53 Westminster officers are aware of the aspiration to bring this additional affordable housing forward for Westminster residents. This would be captured within the S106 and subject to further negotiation, as set out in principle in Section 8 of this report. However, the delivery of these additional homes is the responsibility of MOPAC and not Berkeley and is subject to a future application and determination by LB Barnet, and as such the applicant has no control over this additional affordable housing. A letter has been provided to Westminster setting out the principal of the agreement by the GLA and MOPAC.

Housing Mix

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

Table 1: Proposed housing mix

Tenure	Manhattan	1bed	2bed	3bed	4bed	Total
Private	22	77	139	93	6	337
Social	0	11	50	46	2	109
Intermediate	13	59	38	0	0	110
Total Units	35	147	227	139	8	556
Total (%)	3.3	26.4	40.8	25	1.4	100%

- 7.55 The proposed housing mix has been developed in accordance with the needs of the borough, specifically the requirement for family housing and more limited need for studio units within a single development.
- 7.56 The mix has evolved during discussions with GLA officers, and there are nuances within the private, intermediate and social tenures to make the mix within each appropriate for that tenure. As set out above, the mix within the social rented tenure for example has been closely developed with the GLA and Westminster to meet local and general housing needs, and those of existing residents within the Church Street Housing Renewal Area. The Intermediate tenure mix similarly reflects the pressing need to deliver smaller affordable homes for key workers in Westminster as set out in the Local Plan.
- 7.57 It is proposed for 147 units to be family sizes (3 bed or larger) which equates to 26% and 35 units to be studio units which equates to 3.3% of the total units in accordance with Policy 10 'Housing for specific groups' of the City Plan. Furthermore, none of the proposed units will exceed 200sqm (GIA) in accordance with Part B of Policy 8 'Housing delivery'. Again this aspect of the proposal evolved through the pre-application process, including the reduction in size of the largest penthouse units to optimise housing delivery at the site and number of family sized homes.
- 7.58 This is also in compliance with London Plan policy H10 Housing Size Mix, which states that schemes should generally consist of a range of unit sizes, having regard to local evidence and housing need, and the requirement to deliver mixed and inclusive neighbourhoods, which the Proposed Development comprehensively achieves through the proposed range of private and affordable accommodation, and the variety of unit types proposed within each tenure.

Residential density

- 7.59 The density of the Proposed Development should be considered with regards to London Plan Policy GG2 'Making the best use of land' and the Housing SPG (2016), which in light of the rapid growth expected by 2041, indicates that increasing pressures will be brought on the use of land.
- 7.60 Policy D2 'Infrastructure requirements for sustainable densities' and Policy D3 'Optimising site capacity through the design-led approach' encourage and promote

places to become higher density in appropriate locations such as this which are well connected to jobs, services, infrastructure and amenities by public transport, walking or cycling.

- 7.61 The Density Matrix (Table 3.2) of the Housing SPG dictates that for the accessibility of the site (PTAL rating 6) and its setting, a density range of up to 405 units per hectare is considered acceptable, which this development exceeds. However the London Plan (2021) has removed the density matrix from policy, instead making density and site optimisation an iterative, design led process. Policy H1 'Increasing Housing Supply' requires the optimisation of potential sites for housing delivery on suitable and available brownfield sites, including those with high public transport accessibility, and in relation to the redevelopment of surplus public sector land.
- 7.62 This approach to optimising site density to facilitate and optimise housing delivery is also set out in the City Plan under policy 8 'Housing Delivery', which focuses on the need to optimise sites in Housing Renewal Areas, and planning positively for tall buildings in certain locations. Both provisions apply to PGPS, with the approach to and justification for density set out in the Design and Access Statement.

Residential Quality, Internal Daylight and Sunlight

- 7.63 The proposed scheme has been designed to fully accord with the standards set out within the London Plan, the associated Housing SPG (2016) and Building regulations.
- 7.64 The proposed residential units will all exceed the Nationally Described Space Standards and in this respect are consistent with London Plan Policy D6 'Housing quality and standards' of The London Plan and Policy 12 'Housing quality' of the City Plan. Furthermore, generally apartment layouts are stacked so that most rooms above and below are aligned to reduce the potential for noise nuisance between units. In the few instance where this is not the case, apartment layouts are designed to minimise room type changes between floors.
- 7.65 All the proposed residential units will have access to a private balcony and accord with the Private Outside and Inside Space standards contained within policy D6 (F). Block K includes an internal communal amenity space for private residents at first floor level, while private residents will also have access to the amenities within the basement level of West End Gate, and all residents and members of the public will have unfettered access to the external amenity and garden spaces within the PGPS development.
- 7.66 All units have been designed to optimise space including maximising view and orientation, with 55% of all residential units being dual aspect and all single aspect units being south, east or west facing. Further detail on this is set out in the Design and Access Statement, including design innovations to enhance the residential quality of single aspect units. This includes the incorporation of full height glazing to the return elevations of the balconies, giving a second aspect of view and increasing daylight penetration.
- 7.67 The application is accompanied by an updated Internal Daylight and Sunlight Assessment by GIA, undertaken in accordance with the 2022 updated BRE Guidance, with the April 2021 proposed development also re-assessed against the 2022 updated BRE Guidance

for completeness and comparison. This concludes that the proposed scheme makes the most of the available daylight and sunlight and performs well for a large-scale inner-city residential development, with the daylight and sunlight levels common of most large-scale inner-city residential development, particularly where the site is seeking to make optimum use of land for new homes.

- 7.68 GIA worked with the scheme architects Squire and Partners, and engineers Buro Happold (on overheating and energy performance) to optimise the revised proposal and ensure homes of high residential quality are provided for future residents, based on an iterative design process. A number of features have been incorporated to improve the performance of the amended development in daylight and sunlight terms.
- 7.69 Within the single aspect units (which are predominantly 1-bedroom or Manhattan apartments), the rooms have been arranged so that the principle habitable room (the living room) faces directly onto the façade, with the bedroom set behind the recessed balcony, also benefitting from a glazed outlook on its main and return facade. The less sensitive rooms, namely the kitchen and bathroom are set back within the unit. Where possible, living rooms have been provided with multiple windows, and are dual aspect where possible.
- 7.70 At the same time, additional solidity has been introduced to the façade as set out in the DAS through the introduction of a low-level spandrel panel to reduce the extent of glazing and therefore the potential for overheating, without affecting light penetration in a material way. These design measures collectively ensure that the single aspect homes will provide high quality living accommodation for residents and meet a range of required design standards.
- 7.71 A number of more fundamental design revisions have been made to enhance residential quality, as set out in the DAS and internal daylight/sunlight report, such as reducing the floor plates in the east-west direction, which reduces the number of north facing windows and eliminates all north facing single aspect units. The gap between blocks has been increased to create more daylight and sunlight penetration and reduce overlooking and sense of enclosure between the east-west facades of the buildings.
- 7.72 In summary, the daylight and sunlight report shows that in terms of daylight performance, of the 1,606 proposed habitable rooms, 1,148 (72%) see levels of sDA that either meet or exceed the BRE recommendation for their room use. Of the 458 rooms that fall short of the sDA recommendations, 197 are open-plan living/kitchen/dining rooms (LKDs), 27 are living rooms (with separated kitchens), 35 are studios and 199 are bedrooms. The GIA report then goes into detail of the rooms that do not meet the BRE recommendation, and sets out relevant context and points of consideration for the shortfalls where relevant.
- 7.73 In terms of internal daylight, the amended 2022 proposal performs better than the 2021 originally submitted scheme and therefore provides higher quality residential accommodation. In relation to the April 2021 scheme (re-run using the updated 2022 BRE Guidance) 1,059 (68%) of the 1,557 habitable rooms within the 2021 Scheme see levels of sDA that either meet or exceed the BRE recommendation for their room use. Of the 498 rooms that fall short of the sDA recommendations, 207 are open-plan

living/kitchen/dining rooms (LKDs), 16 are living rooms (with separated kitchens), 21 are studios and 254 are bedrooms.

- 7.74 The 2022 amended proposed development has also sought to improve the quantum of light within the rooms falling short of guidance, this is evidenced by just 7% of the rooms within the 2022 amended proposed development seeing sDA levels less than 10%, compared to 16% for the 2021 Scheme.
- 7.75 In terms of sunlight, the results for the 2022 amended proposal show that of the 1,606 proposed habitable rooms, 666 (42%) see levels of sun exposure on 21st March that either meet or exceed the BRE recommendation of 1.5hrs, with full detail and analysis set out in the GIA report including all relevant considerations. This compares to the April 2021 scheme, which showed that of the 1,557 proposed habitable rooms 751 (48%) see levels of sun exposure on 21st March that either meet or exceed the BRE recommendation of 1.5hrs. Of the 556 living spaces proposed (including all LKDs, living rooms and studios), 336 (60%) would see at least 1.5 hours of sunlight on the 21st March.
- 7.76 The proposed development will offer its future occupants appropriate levels of amenity, including daylight and sunlight, which meet the expectations of an inner-city site. The levels of light achieved are considered appropriate for the emerging context, where the site is seeking to make efficient use of land. Therefore, the scheme is considered to be in accordance with the NPPF, London Plan policy D6 and WCC policy 12, all whilst balancing the need to deliver a viable scheme that makes optimum use of land and balances other policy objectives.

Public Realm Overshadowing

- 7.77 The GIA Internal daylight and sunlight report also analyses the overshadowing of the public realm within the development. In summary, the 2021 Scheme has been re-assessed for overshadowing include the now pedestrianised areas of Newcastle Place and the pavement area surrounding the site, and compared to the updated assessment for the amended 2022 proposal.
- 7.78 The technical assessment shows that for the 2021 scheme, 29% of the street-level public realm saw two or more hours of direct sunlight on 21st March. The sun exposure images provided show Newcastle Place shaded throughout the day on 21st March, with a pocket of sunlight in the south-eastern corner of the site. On 21st June, Newcastle Place would see 1.5-2 hrs of sunlight within approximately half its area and the southern and eastern edges of the site mostly see in excess of 6 hours of sunlight.
- 7.79 The 2022 amended proposed development provides a much larger quantum of street level public realm, and sees an improvement within the proportion of public realm seeing two or more hours of direct sunlight with 32%, compared to 29% for the 2021 Scheme.

Wheelchair Accessible and Adaptable Homes

- 7.80 10% of the units are wheelchair accessible in line with Building Regulations, with the remaining 90% being wheelchair adaptable, which is in line with Westminster Policy and the London Plan. There have been discussions with Westminster's Affordable Housing team around the inclusion of a higher number of wheelchair accessible homes within

the affordable housing tenures of the scheme, which is associated to Westminster's demand profile in line with local need.

- 7.81 At the same time, the London Plan under policy D7 Accessible Housing requires the accessible homes to be provided across tenures equally. The proposed distribution of the 56 wheelchair accessible units is 27% within the social rented tenure, 18% within the intermediate tenure, and 55% in the private tenure. This mix is considered to be an appropriate and balanced response to the requirements set out in policy D7 of the London Plan, and in response to Westminster's local need and requirements specifically for affordable homes.
- 7.82 The Design and Access Statement sets out how the scheme meets inclusive design requirements in line with Policy D5 'Inclusive design' and Policy D7 'Accessible housing' of the London Plan.

Design and architecture

- 7.83 A Design and Access Statement has been prepared by Squires and Partners which sets out the site and context appraisal, provides background on the WEG Masterplan, and explains the design development and the proposed scheme design including the landscaping proposals. The evolution of the scheme in response to engagement with the GLA, and all other relevant pre-application engagement and public consultation is set out in Chapter 5 of this statement, with the most relevant focus being the design evolution that has taken place post-Westminster planning committee in September 2021, underpinned by significant engagement with the GLA, the London Review Panel and other local and statutory consultees including TfL, Designing out Crime officers and others.
- 7.84 As such, the DAS clearly sets out and explains the design evolution that the proposal has gone through, with an emphasis on the exploration of various options in response to the key aspirations of the GLA in recovering the planning application in November 2021. These matters are set out earlier in this document, with a focus on delivering enhancements to the public realm provision, residential quality and fire safety, and other key considerations relating to townscape views, which have informed the amended design.
- 7.85 The DAS also details the operational design of the proposed development, including provisions for access, servicing standards in dwellings, parking and cycle, refuse storage and collection, safety and security.
- 7.86 The concept for the site focuses on the delivery of significantly enhanced public realm and pedestrian permeability through and around the site, the continuation of the mansion block typology, and the introduction of a gateway tower as the three key elements have informed the design approach of the proposed development. This is all based on a thorough assessment of the context of the site and local influences in terms of character areas, accessibility and other influencing matters as set out in the DAS.
- 7.87 It has been a core design principle to address the significant failings of the existing fortress site, and to open up the site, create new pedestrian routes through and into Newcastle Place along with quality new landscaping for residents and the public to

enjoy. Reference of the surrounding mansion blocks and residential character of Little Venice and other character areas has also been designed as a continuation of the typology and materiality of the proposed buildings, while also tying into the earlier stages of the WEG Masterplan.

- 7.88 The proposed revisions and enhancements to the public realm and landscaping masterplan are significant as set out in the submission, and now involve the partial pedestrianisation of Newcastle Place, and the creation of an additional pedestrian route through the site between Block J and K through the removal of the former office podium and entrance. The slimming of the buildings and their footprints has also created further significant public realm area as set out in the submission.
- 7.89 In terms of building height, the three buildings now stand at 24 storeys (Block I), 17 storeys (Block J) and 39 storeys (Block K), a design evolution that has taken place to maximise and enhance the public realm, and to reduce the coalescence with WEG in longer townscape views, to create a better and more successful cluster of slimmer, more elegant buildings, in line with comments from the GLA and the LRP. This allows there to be no reduction in the number of homes and affordable homes delivered through the proposal.
- 7.90 The tallest element (Block K) is intended as an elegant gateway marker at 39 storeys, with a reduced footprint including the removal of the former 25 storey 'shoulder element'. This has been designed in full consideration of its townscape significance including long distance views and local views as well as other tall buildings in the area, with the height now creating variation and reducing the perception of coalescence of massing in identified views. Principally the facade is designed to be vertically expressed and with a minimum number of bays. The simplicity of the design creates an organic rhythm of expressed columns, spandrels, bays and balconies that are recognisable as residential buildings. Further design evolution has taken place following discussion with the GLA to differentiate and define the base, middle and top of the building as set out in the DAS.
- 7.91 Block I has been amended to remove the bullnose treatment fronting Paddington Green, creating additional public realm at the ground floor level and relief from Paddington Green, setting the building away from the Conservation Area. This public realm is now proposed to be a garden space that will be fully publicly accessible, adjacent to the community use. Block I is made more slender and elegant in its form, with the reduced footprint maximising public realm benefits, and enhancing residential quality within the block and to that of neighbouring buildings. The height is revised to 24 storeys, again to the benefit of long views to the site and the appreciation of the composition of buildings, addressing GLA and LRP comments around coalescence of massing.
- 7.92 Block J is, like block I and K made more slender in its form, with the footprint reduced to provide increased space and permeability between the buildings, while stepping down to 17 floors to ensure daylight and sunlight penetration to the buildings behind and to the public realm. The treatment of this block continues to echo the mansion blocks of West End Gate and Maida Vale in its aesthetic, while the removal of the podium link to Block K provides significant enhancements to the public realm and to pedestrian permeability.

- 7.93 As such the scheme design has evolved significantly post Westminster planning committee through numerous discussions with the GLA, London Review Panel and other stakeholder, with a series of revised layouts and built form options being considered. The design proposals are considered to meet all relevant policy including London Plan Policy D4 'Delivering good design' and Policy D5 'Inclusive design'.
- 7.94 A number of key design opportunities has driven the development and revision of the massing and building layouts including:
- Introduce much needed and enhanced permeability to the site replacing the outdated and underutilised former police station buildings.
 - Regenerate and activate the corner of Edgware Road to create a new urban realm and destination.
 - Create pedestrian movement from Harrow Road to Newcastle Place, particularly through Newcastle Place's part pedestrianisation.
 - Create a grouping of tall buildings reflecting the height and prominence of the Westmark and 1 Merchant Square to allow the new cluster of tall buildings to gradually step up in height, with design revisions addressing concerns around coalescence and long views to the site.
 - Frame the entrance to Newcastle Place with a feature building adjacent to the corner of Paddington Green that utilises the unique site constraints to create an architecturally striking building form.
 - Connect Paddington Green and Edgware Road with a new high quality landscaped part pedestrianised and landscaped space.
- 7.95 Each building has been designed to have its own architectural character whilst sitting comfortably as part of the wider West End Gate Masterplan as set out in the DAS, with Block I and J reflecting and continuing the language of the Paddington Green side of the site and consented proposals at 14-17 Paddington Green, while Block K is treated in a more standalone manner as the feature tall building on the site, with echo's and references to Westmark tower.
- 7.96 All external envelopes are designed to a 'fabric first' approach with each building responding to the constraints and opportunities presented by their position on the site, in terms of noise, solar shading and glare. The facade design aims to maintain an overall theme across the Masterplan through the selection of feature stone panels, horizontal stone bands and bronze coloured windows to all building blocks. Spandrel panels have been introduced to the benefit of overheating considerations and general building performance, reducing the extent of glazing, but not to the detriment of internal daylight and sunlight.
- 7.97 The building facades consists of a unitised curtain walling system with high performance double glazing and insulated metal panels. The stacked balconies are used as one of the main elements to provide depth and architectural detail in the facade. The bays and balconies are grouped together and masonry elements are defined with GRC panels and

precast stone spandrels and reveals. Balconies are protected to the edge by 'bronze' coloured balustrades to match the tone and colour of the window system. At ground floor the common parts are glazed to allow for views to the landscaped areas and provide natural surveillance.

- 7.98 The frontages of the retail and commercial units to Edgware Road and Harrow Road will be fully glazed to maximise street animation and address the neighbouring streets. The window and door frames at ground floor will match the 'bronze' coloured window type frames to the office and residential units above. Louvres and doors for ventilation of plant rooms will match the colour and finish of the windows used elsewhere.
- 7.99 A high quality pallet of materials are proposed, taking inspiration from the surrounding context which will work in a variety of scales from the street level to longer views. Materials will be brought together with a high level of craft, detail and architectural integrity. This design will be sympathetic with the quality and craft of the listed buildings of Paddington Garden Conservation Areas whilst also drawing on the new vernacular developed as part of the West End Gate Masterplan.
- 7.100 Blocks I and J employ a similar palette of materials clad in terracotta coloured glass reinforced concrete (GRC) designed with a degree of texture and detail which reflect the local quality of Maida Vale Mansions. The high performance glazing and 'bronze' coloured cladding panels will form the glazed openings.
- 7.101 Block K is designed in contrast to the other blocks, with a lighter palette that draws inspiration from the existing Westmark. This deliberate design move ensure that the gateway tower reads as a slim, elegant and refined building that delivers a new visual marker at this historic junction and entrance way to the centre of London. The final material selected will depend on the ability of sustainable sourcing of materials and the ability to age well and will be investigated further in the detailed design stages.

Tall Buildings

- 7.102 A separate Tall Buildings Policy Assessment by Montagu Evans is included as an appendix to this Planning Statement, given the importance of this policy issue in relation to the proposed development. This includes a full policy analysis against adopted London Plan and Westminster City Plan policy.
- 7.103 As set out in the pre-application section of this Planning Statement, the height, bulk and massing of the Proposed Development has evolved significantly over the course of the pre-application stage, and post-committee with GLA officers.
- 7.104 The design development process over the last year, as set out in the Design and Access Statement submitted with this application, included detailed optioneering of revisions to the height, bulk and massing of the buildings to deliver the enhanced public benefits set out above. Options explored the size, form and location of the footprints, and the associated heights of each of the three blocks, and to increase the distances between blocks to maximise the amount and quality of public realm, which also benefits residential quality within the development and mitigates amenity impact to neighbours, while retaining the 556 proposed new homes on site. These options and the final

proposal are set out in the Design and Access Statement, showing the evolution from the previously submitted scheme.

7.105 Various options were explored, underpinned by extensive townscape and views analysis, and by extensive daylight and sunlight testing, discussed with GLA officers and the LRP, and subject to appropriate peer review. This has resulted in a number of key design moves to deliver enhanced public benefits and to resolve LRP comments around the approach taken to the principle tall building and completion of the tall building cluster on this key junction, which can be summarised as:

- The removal of the bullnose and shrinking of the building footprint of Block I, which increases to 24 storeys in height.
- Removal of the link building between block J and K and removal of the office use from the development, creating a new public route and public realm between the blocks.
- Reduction in the Block J footprint, and increase in height to 17 storeys.
- Removal of the 25 storey 'shoulder' to Block K, significant reduction in the footprint of the building, and increase in height to 39 storeys.
- Revisions to architectural approach and detailing, including greater articulation to the base, middle and top of Block K.

7.106 These changes, particularly the increase in heights of all three blocks, reduce the coalescence of the proposed development with WEG in longer townscape views. The additional height has helped to create a more refined and improved cluster of slimmer, more elegant buildings whilst still delivering the same number of new homes for Westminster.

7.107 It is considered that the proposal responds to the immediate and surrounding context, and is in accordance with tall buildings policy (D9 of the London Plan principally), albeit while exceeding the heights framework set out in the Westminster City Plan. This is however considered to be justified in design, heritage and townscape terms, and should be considered alongside the exceptional public benefits being delivered by the proposal as set out in Chapter 9 of this Planning Statement.

Heritage Assessment

7.108 A Heritage Statement has been prepared by Montagu Evans which assesses the heritage assets in close proximity to the site and sets out the mitigation measures that have sought to reduce the potential effects and enhance the setting and ability to appreciate the heritage value of the site. Further analysis is also provided within the BHTVIA summary section that follows this.

7.109 Great weight has been given to the conservation of heritage assets affected by the 2022 amended proposed development. The significance of the majority of designated heritage assets would be preserved by the 2022 amended proposed development. The northern half of Newcastle Place, which is within the redline boundary, is located within Paddington Green CA, so there is potential for a direct effect on part of that CA, and a setting effect on the rest of the CA, and other heritage receptors in the vicinity.

- 7.110 The conclusion of the heritage assessment is that there would be a harmful effect on Nos. 14 and 16 Warwick Avenue , which are grade II listed, because the 2022 amended proposed development would appear above the roofline of the villas, in an area of uniform historic character. The harm would be limited, less than substantial (as defined by the NPPF) and at the lower end of the scale. There would also be a low degree of less than substantial harm to the Regent's Park CA and Registered Park and Gardens due to the slight urbanising effect on their setting through the introduction of new tall development in views south.
- 7.111 It is recognised that any degree of harm to a designated heritage asset is of great weight in the planning balance, albeit its limited degree is relevant in the weighing exercise required by paragraph 202 of the NPPF. The Planning Statement prepared by Turley identifies the considerable public benefits of the scheme and carries out the weighing exercise.
- 7.112 The assessment identifies some modest beneficial setting effects of the 2022 amended proposed development, because it will replace a large, unattractive and disused building with a development of high architectural quality in superior materials, albeit of larger scale. The setting and appreciation of the significance of Paddington Green CA and the listed buildings fronting the Green, and the grade II* listed Marylebone Lower House North Westminster Community School, would be slightly enhanced by the 2022 amended proposed development. The public realm enhancements to Newcastle Place would have a direct beneficial effect on the Paddington Green CA. The Rottingdean judgement has clarified that any such benefits to designated heritage assets are of great weight in the planning balance.
- 7.113 In response to requests from the GLA during determination, additional heritage assets have been included in this assessment for completeness. No harmful effects have been identified to any of these heritage assets, including 22-42 Norfolk Square, 3-33 Orsett and 18-42 Terrace, 168-213 Sussex Gardens, Queensway CA and Westbourne CA.
- 7.114 During post-submission consultation with the GLA in October 2022, the Principal Heritage Officer agreed that the existing Police Station building is detrimental to the setting Paddington Green CA. However, the GLA considered that the scale of the 2022 amended proposed development would harm the setting of several heritage assets, including the Maida Vale CA, Paddington Green CA, Lisson Grove CA, Hyde Park RPG, the grade II* Church of St Mary, grade II* listed Christ Church and grade II* listed Marylebone Lower House North Westminster Community School, and this harm would be less than substantial.
- 7.115 Our conclusion differs from that of the GLA as a result of a difference in professional judgment. Our assessment identifies slight positive effects on the Paddington Green CA and grade II* Church of St Mary, and no harm to the Maida Vale CA, and barely discernible harm to the Hyde Park RPG. Our conclusion derives from the following considerations. First, the proposed increase in scale will be experienced in the setting of existing tall buildings at WEG and Paddington Basin. Second, the existing building on the site, the former Police Station, is itself a large building (with 8 storey and 17 storey elements) but of poor architectural quality and disused. Third, its replacement with

buildings of high design quality and public realm enhancements would therefore be a positive change, despite the increase in scale.

- 7.116 Nevertheless if the GLA continues to conclude that the 2022 amended proposed development causes less than substantial harm to the these designated heritage assets, which we consider must inevitably be at the lower end of the scale, given the public realm enhancements and improved design quality of the proposed building. Whilst the harm would be of great weight in the planning balance, it would need to be weighed against the considerable public benefits of the 2022 amended proposed development, as required by paragraph 202 of the NPPF. The Planning Statement prepared by Turley identifies the public benefits and carries out this weighing exercise.
- 7.117 During pre-application discussions WCC requested that the reuse of the decorative bas relief panels on the sides of the former Police Station be explored, potentially in the subway to Merchant Square. We note that the former Police Station is not located in a CA, nor has it been identified as a non-designated heritage asset during pre-application discussions. The panels could therefore be removed without the need for planning permission. However, the applicant is content to work with the Council to find an alternative location for these panels elsewhere in the immediate locality, to be secured by planning condition.
- 7.118 Officers of the GLA have requested that the existing building is recorded prior to any demolition, and has indicated that this could be secured through a condition on any consent. At the time of writing, the Applicant is in the process of appointing consultants to undertake historic building recording, which would be submitted to the GLHER and other appropriate archives. The record is intended to be submitted prior to determination to avoid the need for a planning condition.
- 7.119 In conclusion, the proposals comply with all relevant national and local planning policy on the historic environment, including Policy HC1 of the London Plan and the heritage policies of the Westminster City Plan 2019-2040. In granting planning permission for the application, the Mayor would be discharging his statutory duty with respect to section 72(1) and section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act (1990), subject to the consideration of public benefits set out in the Planning Statement.

Built Heritage, Townscape and Views

- 7.120 A Built Heritage, Townscape and Visual Impact Assessment (BHTVIA) has been prepared by Montagu Evans as part of the ES. The Application Site does not contain any heritage assets although there are heritage assets in the wider area (and a very small portion of the redline falls within the Paddington Green Conservation Area), and the BHTVIA assesses the potential of the proposed development to impact their setting. The Tall Buildings Policy Assessment by Montagu Evans attached to this Planning Statement as an appendix includes a relevant section on views analysis in relation to tall buildings policy.
- 7.121 The BHTVIA considers the proposed development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces. The visual assessment considers the impact of the proposed development upon visual

receptors, assessing how people will be affected by the changes in views and visual amenity at different places, including publicly accessible locations. Viewpoint locations were agreed with officers during pre-application discussions, with additional viewpoints subsequently agreed with GLA officers, and have been adopted and assessed.

7.122 The townscape surrounding the site may be categorised into six distinct areas. These broadly comprise residential, office and urban. The following 6 character areas (within a 750m radius from the site) have been assessed with regards to direct and indirect effects from the proposed development:

- Paddington Green (TCA1)
- Lisson Grove (TCA2)
- Paddington Basin and surrounding area (TCA3)
- East of Edgware Road (TCA4)
- Maida Vale and Little Venice (TCA5)
- Bayswater (TCA6)

7.123 The visual assessment illustrates and considers the existing baseline view, the future views (with the development built) along with cumulative scheme that have been granted planning permission to understand the impact on all 37 identified views. A summary table summarises each view, location, visual amenity value, receptors, susceptibility to change, sensitivity, magnitude of impact and likely effect on the site preparation and construction, operation and cumulative views.

7.124 In respect of views, the site is not located within the Landmark Viewing Corridor of any identified strategic views in the London View Management Framework. However, consideration was given to the strategic views from Primrose Hill (LCMF 4A.1, Viewpoint 26 in the assessment) for completeness meeting London Plan Policies HC3 and HC4 and Westminster City Plan Policy 40.

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

Demolition and Construction Phase Impacts

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

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

7.128 There would be no significant likely effects on visual receptors at this stage of the 2022 amended proposed development. The likely effects range from None to Minor Adverse,

depending on the proximity and relationship between the viewpoint and the site. These likely effects would be indirect, temporary, medium-term and not significant.

Completed Development Impacts

- 7.129 Following the completion of the development, the heritage receptors would experience likely effects ranging from None to Minor-Moderate Beneficial, which would not be significant. The Minor-Moderate Beneficial likely effects would apply to the listed structures at Marylebone Lower House North Westminster Community School (grade II*). The beneficial effect would be derived from the overall improvement to the setting in which the listed buildings are appreciated.
- 7.130 The assessment has identified a potential Minor Beneficial (not significant) effect on Paddington Green CA, deriving from the redevelopment of a large building of poor quality with three attractive well-designed buildings and improved public realm. The assessment has identified a potential Minor Adverse effect to No. 14 and 16 Warwick Avenue, because the 2022 amended proposed development would appear above the roofline of the houses, albeit in transient and incidental views. The assessment has identified a potential Minor Adverse effect to Regent's Park CA and RPG. The assessment has identified a Negligible Adverse effect on Hyde Park RPG.
- 7.131 There would be Negligible (Neutral or Beneficial) to Minor Beneficial effects on the surrounding character areas. These likely effects would not be significant and would be direct, permanent and long-term.
- 7.132 There would be Moderate Beneficial effects on the visual receptors experiencing the 2022 amended proposed development in views 6 and 6W. These effects would be significant, direct, permanent and long-term. There would be None to Minor-Moderate Beneficial effects on the remaining visual receptors and views. These likely effects would not be significant and would be direct, permanent and long-term.
- 7.133 The proposed development has evolved through a detailed understanding of the site and its surrounding context. The BHTVIA demonstrates the proposed development would not give rise to any unacceptable impacts to heritage, townscape or visual receptors.
- 7.134 On the whole, the proposed development would demonstrably improve the appearance, character and function of the townscape, in line with Westminster City Plan Policy 40 Townscape and Architecture. The DAS and the HTVIA both illustrate how the development has been sensitively designed, having regard to the prevailing and contextual heights and character around the site.
- 7.135 In addition, in line with the requirements of part (F) of policy 40, the scheme has been assessed in the context of the identified strategic and local views, and it has been identified that the contribution of the Proposed Development to the views will be positive and beneficial in many instances.
- 7.136 Similarly, London Plan Policy HC3 Strategic and Local Views, and policy D9 Tall Buildings requires the visual impact of proposed tall buildings to be assessed, examining the impact on views from different distances, while also considering aspects such as the immediate spatial hierarchy, the architectural quality, the impact on heritage assets and

other considerations. As set out above, this has been thoroughly assessed in the ES chapter, and is also set out in the Tall Building's policy analysis section above and in Appendix 1 to this statement. A number of enhancements to views have been identified through the assessment undertaken, illustrating compliance with both Local Plan and London Plan policy around views and townscape, and specific criteria relevant to tall buildings.

Wind and Microclimate

- 7.137 Ramboll have undertaken a Wind Microclimate Assessment which detailed the likely effects as a result of the demolition and construction stage and the completed development stage of the proposed development, taking into account the relevant national and local guidance and regulations.
- 7.138 For the demolition and construction stage, wind conditions were assessed qualitatively, using professional judgement of an experienced wind engineer, based on an assessment of the background wind climate at the site, and the results from the wind tunnel tests.
- 7.139 In summary, it is considered that the demolition of the existing buildings on site and construction of the proposed development would result in a direct, temporary, medium-term Negligible (not significant) effect on wind microclimate and identified receptors, and as such would not give rise to significant effects on wind microclimate.
- 7.140 During the phased occupation, construction of Block I would be within Phase 1 and Blocks J and K within Phase 2. Wind conditions would gradually adjust from the existing baseline scenario to those described below for the completed development, and would therefore range from Negligible (not significant) to Minor Adverse (significant).
- 7.141 With the proposed development complete and operational, wind conditions would range from suitable for sitting to strolling use during the windiest season, with strolling conditions situated predominantly around Block K. Wind conditions during the summer season would generally be one category calmer and suitable for sitting and standing use, due to the calmer winds experienced during this time of the year.
- 7.142 With the introduction of the proposed landscaping scheme and mitigation measures, wind conditions at windier than suitable seating spaces would improve. However, three isolated spaces around Block K would remain windier than suitable for sitting use. Pedestrians/occupants would be expected to use nearby spaces which would have suitable conditions, should these locations be unsuitably windy.
- 7.143 Overall, it is considered that the completed proposed development would result in effects that range from moderate beneficial to minor adverse in terms of the effect on wind microclimate and identified receptors.
- 7.144 Westminster Policy 41(B) Part 5 relates to the design of Tall Buildings, and requires mitigation for any negative impacts on the microclimate at the site and surrounding area, which is also a requirement of London Plan policy D9. Landscaping and other mitigation has been developed to improve identified areas around the site, while the orientation and shape of buildings has also been developed with microclimate in mind, to minimise any adverse impacts resulting from the development.

Daylight and Sunlight

- 7.145 A daylight, sunlight, overshadowing and solar glare report has been prepared by GIA taking into account the 2022 updated BRE Guidance as set out in the ES, to assess the effects to arise from the demolition and construction stage, as well as the completed development stage of the proposed development on the surrounding relevant receptors. These receptors are identified in the assessment that comprises Chapter 10 of the ES, and the associated appendices to the ES. The proposals have been developed in consideration of London Plan policy and guidance, including Westminster policy 7 Managing Development for Westminster's People.
- 7.146 Of relevance in considering and assessing the daylight and sunlight results is the setting of the site, and its context within a dense urban location that features many tall buildings, as set out in the Design and Access Statement predominantly, including the neighbouring WEG development, the Paddington Basin, and tall buildings along Edgware Road and around the Edgware Road/Harrow Road junction. This level of density will therefore provide context to the assessment results, and comparable levels of impact and remaining daylight and sunlight for comparable environments in terms of density.
- 7.147 London Plan policy D6 Housing quality and standards states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. The supporting text to Westminster's City Plan Policy 7 at the local level states that the City Council will take a balanced approach when assessing amenity impacts that considers the specific location and context as well as the merits of each proposal including the wider benefits a scheme can deliver, against impacts on the surrounding area.
- 7.148 Although subsequently not adopted and superseded by a suite of other LPG documents (which remain in draft form) including the Housing Design Standards LPG, for context, the Draft GLA Guidance 'Good Quality Homes for all Londoners' (consultation draft – consultation ended January 2021) provided an interpretation of the BRE Guidance in the context of London, and specifically in relation to VSC analysis, adopting a 50 degree development angle for London, against a 25 degree development angle that corresponds to the BRE target of 27%. Again, although not adopted, this stresses the importance of considering daylight and sunlight impacts in a contextual manner, in this case relevant to the dense, central London location of the site.
- 7.149 The site's layout and other policy priorities around optimising the public sector land for housing delivery, and delivering regenerative benefits is also a material planning consideration that has informed the development of the site, as has its suitability to accommodate tall buildings, as set out in Westminster policy. The linear, narrow nature of the site also affects the number of design options for the arrangement of buildings, however the design has evolved to ensure that orientation, arrangement and the retention of gaps between buildings will deliver daylight and sunlight penetration through the site.
- 7.150 For daylight and sunlight, the study area was defined by the extent of residential properties which have windows facing the site (within 500m from the site boundary) and that were considered in close enough proximity to the site to be potentially affected

by the proposed development. The principal properties that have been assessed include:

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

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

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

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

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

- Daylight
 - Vertical Sky Component (VSC); and
 - No Sky Line (NSL) Method;
- Sunlight
 - Annual Probable Sunlight Hours (APSH); and
 - Winter Probable Sunlight Hours (WPSH).
- Overshadowing
 - Transient Overshadowing; and
 - Sun Hours on Ground
- Solar Glare
 - Technical Solar Glare analysis.

7.155 The report sets out the assumptions and limitations that have been used in assessing the above given the information available and the use of professional judgement and a reasonable flexible approach as set out by paragraph 125c of the NPPF, Policy C5.3 of the Housing SPG (yet to be adopted) and Policy D6 of the new London Plan 2021.

- 7.156 In addition, a supplementary Average Daylight Factor (ADF) daylight assessment has been applied. ADF is a detailed form of daylight assessment applicable to new developments where internal layouts are known and accounts for the most factors in establishing a quantitative output. Whilst this method of daylight assessment has been superseded by another metric in the 3rd and current edition of the BRE Guidelines published in June 2022, it is still considered to be an appropriate supplementary assessment for neighbours which were designed and permitted in accordance with ADF targets, to understand the change from their targeted daylight levels.

Flexible Approach and Alternative Targets

- 7.157 The ES sets out that given the location of the site, typical VSC levels to be expected in Central London should be provided to indicate whether VSC to surrounding sites are appropriate, to give a more appropriate benchmark for acceptable levels to neighbouring properties. This is in place of using the 27% figure indicated in the BRE guide, which is a national standard.
- 7.158 This view is supported by Para 125c of the NPPF, which states that authorities should take a flexible approach in applying policy and guidance on daylight and sunlight where they would otherwise inhibit making efficient use of a site. This is also supported in emerging GLA Housing guidance policy C5.3 which states that BRE guidance should be applied sensitively to higher density development, where BRE suggests using alternative targets, taking into account local circumstances, the need to optimise housing capacity, and the scope for the character and form of an area to change over time.
- 7.159 As such, retained levels of daylight are taken into consideration as part of the scale of effects, given the difficulty in avoiding large factor reductions in dense urban locations. As such, weight should be given to retained values and not just the percentage change. This is of specific importance in relation to the existing properties on Edgware Road, to Blocks A, B, and H of West End Gate/Paddington Green, and to 1 and 6 Merchant Square.
- 7.160 It should be noted that where existing levels of natural light within properties are low, any alteration would result in a disproportionate percentage change, when the actual change experienced by the occupier may not be as noticeable as the percentage change suggests. Detailed design considerations such as window size, room use, room size and aspect should be taken into account, especially where there are mitigating factors such as balconies, overhangs or other features that may impact on the assessment.

Demolition and Construction Effects

- 7.161 The demolition and construction effects of the proposed development would be temporary, medium-term Negligible (not significant) at the point of demolition and commencement of construction. Throughout the duration of the construction period, as the 2022 amended proposed development superstructure is built out and clad, the effects would increase until reaching those of the completed development.
- 7.162 Overall, the demolition of the existing site and construction of the 2022 amended proposed development would result in temporary, medium-term Negligible (not significant) to Major Adverse (significant) daylight effects and Negligible (not significant) to Major Adverse (significant) sunlight effects. In terms of overshadowing, the effects would range from Negligible (not significant) to Minor Adverse (not significant). The

solar glare effects would be Negligible (not significant) to Moderate Adverse (significant).

Completed Development Effects - Existing Baseline Assessment

- 7.163 In the existing baseline, in relation to daylight, a total of 708 windows serving 464 rooms were assessed within the 41 relevant existing residential buildings. For VSC 95 of the 708 (13.4 %) of the windows would meet the BRE recommendation of 27 % in the existing baseline condition and 284 of the 464 (61.2 %) would meet the BRE recommendation for NSL, showing a low level of existing compliance to BRE guidance.
- 7.164 For the 40 residential buildings sensitive to sunlight, 410 rooms have been assessed. 323 of the 410 (78.8 %) would meet the BRE recommendations for APSH and WPSH.
- 7.165 In addition to the 41 properties above, WEG Blocks A-F have also been assessed as part of the existing baseline given ongoing occupation. For the five residential blocks tested, a total of 1,249 windows serving 793 rooms have been assessed for daylight. For sunlight 781 rooms have been assessed. In relation to daylight, for VSC 476 of the 1,249 (38.1 %) of the windows would meet the BRE recommendation of 27 % in the existing baseline condition and 686 of the 793 (86.5 %) would meet the BRE recommendation for NSL. For sunlight, 513 of the 781 (65.7 %) rooms would meet the BRE recommendations for APSH and WPSH.
- 7.166 In terms of the ES assessment of impact; of the 41 existing residential receptors assessed for daylight effects, a total of 23 existing receptors would experience Negligible effects and seven would experience Minor Adverse effects which are not significant. A further nine would experience Moderate Adverse (significant) effects and the remaining two, Edgware Road 332 and Edgware Road 334-336 would experience Major Adverse (significant) effects.
- 7.167 Of the five residential blocks assessed for daylight effects within WEG, Block D would experience Negligible effects and Blocks C and E-F would experience Minor Adverse effects which are not significant. Block B would experience a Moderate Adverse (significant) effect and Block A would experience a Major Adverse (significant) effect.
- 7.168 Of the two residential blocks assessed for daylight effects within 14-17 PG, Block G would experience a Moderate Adverse effect and Block H would experience a Major Adverse effect, which are significant.
- 7.169 In relation to sunlight, of the 39 existing residential receptors assessed for sunlight, a total of 25 existing receptors would experience Negligible effects and seven would experience Minor Adverse effects which are not significant. The remaining eight would experience Moderate Adverse (significant) effects
- 7.170 Of the five residential blocks within WEG assessed for sunlight effects, Blocks C, D and E-F would experience Negligible effects which are not significant. Blocks A and B would experience a Major Adverse (significant) effect. Of the two residential blocks assessed for sunlight effects within 14-17 PG, Block G would experience a Moderate Adverse effect and Block H would experience a Major Adverse effect, which are significant.

- 7.171 Owing to scale of the proposed development, reductions of this scale would be anticipated within an urban location. However, the levels of daylight and sunlight retained at each of the properties which would experience significant effects should be considered, and based on professional judgement the retained levels are acceptable for an urban location as set out in the section above in relation to the flexible approach and alternative targets that should be applied, particularly for the WEG blocks and properties on Edgware Road.
- 7.172 In accordance with London Plan policy D6 Housing quality and standards states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, a consideration repeated in the Westminster City Plan.
- 7.173 Please refer to the ES chapter for the detailed assessment of the baseline and each property, including retained values and baseline levels of VSC and NSL, associated levels of impact and contextual considerations and assessment for each identified property.

Overshadowing

- 7.174 In relation to overshadowing, of the five amenity areas assessed for sunlight, Paddington Green (Area 1), 14-17 PG Blocks H courtyard (Area 2), 1-32 Gilbert Sheldon house communal area (Area 4) and Marylebone Road/Edgware Road green wall public square (Area 5) would experience Negligible effects which are not significant. The remaining area WEG Block A and B amenity area (Area 3) would experience a Minor Adverse (not significant) effect.

Cumulative Effects Assessment

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

Daylight & Sunlight Summary

- 7.176 As such, the Proposed Development does result in adverse impacts on the daylight and sunlight received by neighbouring properties, with the most significant impacts being to Berkeley's own adjacent buildings within West End Gate. The results have been presented in a number of ways, including providing analysis around retained values and average daylight factor, which helps to provide further context that is more specific and relevant to the dense urban location of the site, which is considered and stressed in emerging London Plan guidance.
- 7.177 In accordance with Westminster's City Plan Policy 7 and London Plan policy D6 a balanced approach is required that considers the specific location and context. The reductions in daylight and sunlight to neighbouring properties should therefore be considered alongside the values that are retained by these properties to give a fuller picture of the overall condition.
- 7.178 On this basis, although harm is caused to the daylight and sunlight amenity of neighbouring properties, given the sites context and the existing retained values this

level of harm is considered to be both expected and acceptable in line with the policies above.

- 7.179 Nonetheless, the impacts should then also be balanced against the public benefits being delivered through the proposal, which are extensive as set out in chapter 9 and 10 of this statement, and have to be contextualised and balanced against other policy requirements and imperatives to optimise the site for housing delivery and regenerative benefits as surplus public sector land, and to deliver a viable and optimal scheme.

Landscaping and Public Realm, Public Art

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

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

- Transformation of Newcastle Place into a significant, pedestrianised area of public realm providing green amenity space for residents and the wider public to enjoy.
- Restricted, one-way vehicle access to Newcastle Place reinforcing the pedestrian friendly character of this green amenity space, with vehicles routed around the northern façade of Westmark in the WEG development.
- Provision of improved permeability throughout the site from Edgware Road to Paddington Green, between Harrow Road and Newcastle Place, and connections to the wider Paddington Central area via the pedestrian subway.
- Removal of the previous podium office link between block J and K to deliver an additional area of permeable public realm, while the shrinking of Block I creates a new garden space fronting Paddington Green.
- Creation of a new landscaped plaza at the junction of Edgware Road Harrow Road and A40.
- An enlivened, enhanced, green and healthy streetscape along Edgware Road and Harrow Road, continuing that delivered by WEG.
- Significant play space provision within the landscaping masterplan.
- Provision of short stay cycle parking within the public realm.
- Provision of public art, including partial reuse of the existing building's panels/frieze.
- Potential integration with the future Transport for London (TfL) SUD proposals for the Joe Strummer subway, to be installed prior to redevelopment.
- Integration of new tree planting and a diverse range of plant material to add scale, texture and colour to the landscape and increase local biodiversity and greening.
- Use of robust, high quality materials and furniture in the public and private realm.

- 7.182 The proposed landscaping elements can be seen in figure 7.1 below

Figure 7.1: Illustrative Landscape Masterplan



- 7.183 The landscape masterplan includes a variety of character areas which respond to the design and layout of the buildings, providing a range of public and semi-public communal spaces enabling a variety of experiences to be enjoyed, as set out in the Landscape section of the DAS, which has been enhanced significantly through the amended proposal.
- 7.184 Public realm now comprises 69% of the planning application site area (a 53% increase on the April 2021 proposal), delivering nearly 5,000 sqm of public realm to the site. This has resulted from the reduction in the size of each building's footprint, and through the removal of the office podium element between block J and K, in addition to the part pedestrianisation of Newcastle Place, giving public realm back to the local area.
- 7.185 The new public realm links the busy Edgware Road retail and transportation hub, through the now pedestrianised and publicly accessible green and landscaped space of Newcastle Place to the quietness and open space of Paddington Green. There are then further new routes between each building in the proposed development, creating exceptional permeability for pedestrians and cyclists from all points around the site, and creating opportunity for different character areas to emerge.
- 7.186 Enhancement of the surrounding streetscape will facilitate circulation, promote active frontages and provide additional greening. The landscape masterplan recognises the importance of providing high quality, multifunctional, accessible outdoor space. Open space provision across the site includes a series of public and communal spaces that not only contribute to the setting of the buildings but add to the enjoyment and use of the development by providing a range of comfortable, engaging, innovative and accessible spaces for residents and visitors to the area.
- 7.187 Within these areas, a range of features including, seating, lighting, a water feature, planting, wayfinding and play elements have been provided to activate and enhance the experience of the spaces around the buildings and encompassing the site, creating a

variety of spaces for gathering and social interaction, active and passive recreation and general circulation and movement.

- 7.188 Responding to the ground floor non-residential uses all external space within the site at ground level is publicly accessible. Generous footways adjacent to the building facades will support and promote spill-out uses at ground level.
- 7.189 As such the landscaping proposals are transformative and substantial, and will deliver significant place making and environmental benefits to the site and surrounding area, delivered in part through the stopping up of Newcastle Place. The stopping up will also remove the maintenance costs and burden from the City Council, providing a further benefit.
- 7.190 Importantly, the 'ground floor first' approach taken in terms of the site layout meets principal 3 of Westminster Policy 41 (B) Tall Buildings, by delivering an attractive and legible streetscape that takes account of the use of the public realm for a variety of uses, and includes active uses at ground floor level.
- 7.191 In relation to Policy 43 Public Realm, the proposal delivers well designed public realm using high quality materials, and extensive high quality soft landscaping including significant new tree planting as part of the streetscape design, which has been developed in line with officer comments. The public realm will be safe and accessible in line with part B of Policy 43 and creates a legible network of permeable spaces through and around the site, with a hierarchy of spaces including the re-imagined part pedestrianised Newcastle Place, and connecting routes through to Harrow Road and Edgware Road, linking the site through to Paddington Green.
- 7.192 This creates clear sight lines through the site from Harrow Road and Edgware Road in particular, in comparison to the impermeable existing building and environment. Quiet routes are proposed, which promote walking and cycling through and around the site in line with Policy 25 Walking and Cycling, and all parts of the ground floor are fully publicly accessible in line with the aspiration of policy 25 and 43.
- 7.193 In line with Policy 25 the development prioritises and improves the pedestrian environment, providing dwell and relaxation spaces including seating and spaces for congregation. The spaces are permeable, will contribute to way finding, be well lit and secure, with legible entrance points around the site for all uses including residential, commercial and community use entrances. Around the site, the footpaths will be generous in terms of width, and comprise high quality materials with minimal clutter, making them inclusive and accessible for all.
- 7.194 Cycling is also supported, providing new safe routes and on street short stay cycle parking within the landscaping masterplan, in addition to private parking and facilities within the basement for users of the development.
- 7.195 In terms of other aspects of policy 43, active frontages are maximised to all three blocks, as is soft landscaping which provides visual and environmental benefits from the surrounding urban environment. As such, the proposal is extensive and comprehensive, and will re-integrate the site into the local community and neighbourhood in a way that the previous secure police station site was not planned to do. This was also a key focus

area within the feedback from the public consultation. On approaching from the neighbouring tube station there will be clear routes and ground floor activity around the site, providing a clear focus and attraction for the local community.

- 7.196 Furthermore, the proposal will include installations and public art around the site in line with policy 43, and it is the intention to retain a portion of the modernist frieze that is currently located on the Harrow Road elevation of the Police Station.

Urban Greening & Biodiversity

- 7.197 The existing urban site will be transformed into an accessible landscaped area for use of both residents and the public. The proposals also deliver a significant increase in urban greening and a net gain in biodiversity. This is delivered in line with key environmental policy aspirations including Westminster Policy 34 Green Infrastructure and London Plan requirements around urban greening.

- 7.198 Policy 34 will be met and exceeded, delivering city greening through substantial tree planting and soft landscaping. New significant public open space is provided as set out above in addition to children's play space. Biodiversity net gain is substantial, delivering significant enhancement on the existing situation and met in a number of ways as below, including substantial on-site tree planting.

- 7.199 With the planting of semi-mature trees, multi-stem trees, specimens, shrubs, ground cover, lawns and accent species and bulbs for seasonal interest the biodiversity and habitats of the local landscape will be vastly improved.

- 7.200 Although the assessed Urban Greening Factor score of 0.36 is below the Mayor's target score of 0.4 (which continues to be the target through ongoing design development), the improvements to the existing highly urban area is a vast improvement when considered against the constraints of the site and proposal of a predominantly residential mixed use development.

- 7.201 In terms of biodiversity net gain, the existing condition of the site creates an opportunity for significant enhancement. The proposal delivers a net gain of a 224.42% for area-based habitats, and a net gain in hedgerow units, delivered through new vegetation and planting, new lawns, roof gardens, rain gardens, hedges, ground cover and grassland, and significant tree planting around the site. This far exceeds the 10 % net gain required by emerging planning policy and legislation. The six existing trees within the site will be retained, with 77 additional trees proposed as part of the development, delivering significant benefits in line with Policy 34 and London Plan objectives.

Amenity and Playspace

- 7.202 The site provides over 4,700sqm of public amenity space around the three Blocks and within the linear park to the south of Block A with WEG, amounting to 69% of the total site area, which is a significant enhancement on the original 2021 proposal, with a number of character areas of public realm and significant greening and planting around the site as set out above.

- 7.203 Within this public realm, deliberately located within the pedestrianised area of Newcastle Place, a total of 840sqm of play space is proposed which is integrated within the landscaping for the site, focused on provision within the pedestrianised area of

public realm on Newcastle Place, and within the newly proposed garden area at the western end of the site between block I and Paddington Green, providing a range of play space typologies for all age ranges as set out in the play space strategy within the DAS.

- 7.204 Given the constraints of this Central London site, there is a shortfall in the required amount of playspace when reviewed against the GLA population yield calculator. However, this play space provision should also be seen in the context of the playspace already being delivered at West End Gate, and some of the associated resident's amenities that would be available to private residents of the development, such as the swimming pool located underneath Block A of West End Gate.
- 7.205 On site play space provision is further limited by the wider package of design revisions associated to the revised scheme. The revised energy strategy delivers a significant enhancement in terms of on-site carbon reduction as set out elsewhere in this statement and in the wider submission, however the move to an ASHP strategy has necessitated the removal of the roof top garden from Block J to accommodate relevant plant for the buildings, meaning a reduction in available play space and amenity space generally in this block.
- 7.206 In addition, the plaza area of public realm on the corner of Edgware Road and Harrow Road has not been considered suitable as a play space location given the environmental constraints, with this being one of the largest areas of public realm in the development. The strategy has instead focused on maximising provision within the pedestrianised Newcastle Place space, and within the new garden created at the western end of the site fronting Paddington Green.
- 7.207 Mitigating factors relating to the under provision of on-site play space include the direct adjacency to the Paddington Green area of open space and St Mary's Church Gardens to the west of the site, which is being made more accessible to residents through the provision of a new crossing between PGPS and Paddington Green. Paddington Green also includes a large public playground adjacent to the City of Westminster College, providing public play space in the immediate vicinity of the PGPS site.
- 7.208 There is also further public play space a short walk to the north of the site on Adpar Street, just to the north of the adjacent Hall and Braithwaite Towers. In addition, Regent's Park is located to the east of the site, circa 15 minutes' walk away, providing extensive green space and defined play spaces. At the northern end of the St Mary's Church Gardens is also the Little Venice sports centre, providing further publicly accessible play and recreation facilities a short distance from the site.
- 7.209 Furthermore, an offset contribution will form part of the S106 contributions as set out in Chapter 8 of this Statement. Discussions are underway with the City Council in relation to the allocation of this contribution to either the enhancement of an existing play space, or the provision of new playspace in the vicinity of the site. As such provision will be in line with the London Plan, and Westminster policy 12 and 43 through a combination of maximised on-site provision given the constraints of the site, and off-site contributions to address a shortfall.
- 7.210 The strategy has focused on providing on-site play opportunities for younger children and their carers which is deemed important in this area of London, and more generally

due to the need for these facilities to be located within a very short walking distance for families with children of this age, which include adjacent on Paddington Green, and other sites within walking distance of PGPS.

Street furniture and lighting

- 7.211 The furniture palette for the site has been designed to be contemporary, simple and robust; selected to be attractive yet functional, considering the issues of accessibility, durability and future maintenance in line with Westminster Policy 43 Public Realm and Policy 25 Walking and Cycling, which are both explored in detail above.
- 7.212 The majority of trees and shrubs within the site will be in raised planters integrated with seating. Seating will have backrests and armrests to improve function for all users.
- 7.213 The public plaza located next to the Edgware Road junction will include an arrangement of feature seating benches within the urban glade trees. Selected benches will also include arm and back-rests and trees will be planted in discrete, flush tree surrounds.
- 7.214 The conceptual plan has been developed for the external areas of the site, providing lighting to support the functions of the different spaces within the scheme, highlight elements within the landscape and to ensure the safety and accessibility to all areas of the public and private realm, as well as complementing the external lighting on the buildings.
- 7.215 Newcastle Place will be lit with pole mounted area lighting illuminating access through the spaces and providing safety for all users. Uplights to trees in the landscape and within the water feature will also accentuate these features and will add to ambient light levels and mood in various locations around the site.
- 7.216 The existing lighting to the surrounding streets and footways will generally be maintained and upgraded where necessary to achieve the required lighting levels for access and safety around the perimeter of the site.
- 7.217 The proposed communal roof gardens and terraces will be lit with low level access lighting, with feature uplighting to selected trees providing highlights and a general ambient light to all areas without glare or impact on neighbours, and without creating additional light spill in the neighbourhood.

Sustainability

- 7.218 A Sustainability Statement has been prepared by Buro Happold which sets out that the scheme considered the principles of sustainability early in the design and planning process to ensure that the construction, operation and future occupation is as sustainable as sustainable as possible. This is in line with Westminster and GLA policy, as part of the wider aspiration to deliver high quality, sustainable architecture at PGPS.
- 7.219 The proposed development responds positively to the range of relevant policies relating to Environmental Rating Methods, Energy and CO2 Emissions Climate Change Adaptation, Water Efficiency, Materials, Waste Management, Pollution Management, Ecology & Biodiversity, Sustainable Transport & Access. The Proposed Development has

endeavoured to ensure that social, economic and environmental issues are dealt with in an integrated and equal manner.

- 7.220 A BREEAM Pre-assessment has been carried out by an accredited BREEAM Assessor and is submitted with this application. As required by WCC local policy, all commercial areas of the Proposed Development are expected to achieve as a minimum a BREEAM 'Excellent' rating. At the same time, the energy strategy has been developed to be all electric based on an ASHP strategy (see below), alongside the provision of PV cells delivering on site renewable energy generation. This will deliver significant on site carbon reduction savings of over 60% against Part L, as set out in the Energy section below.
- 7.221 The proposed development has ensured that it has reduced its external heat rejection to the atmosphere; has incorporated planting to combat the effects of climate change; and it has reduced its reliance on air conditioning systems to combat overheating by using solar control glazing, mechanical ventilation and reducing internal heat gains as far as feasible.
- 7.222 The proposed development is located within Flood Zone 1 and is at low risk of flooding from fluvial and tidal sources and it will not increase the risk of flooding to the Site or surrounding areas. SUDS are included in the proposed design, as are green roofs, landscaped gardens and attenuation tanks, providing further sustainability benefits.
- 7.223 The proposed development has been designed to maximise the opportunities for incorporating water saving measures which include the use of water saving fixtures and fittings, optimised water management through leak detection and reduced water flow rates.
- 7.224 As far as practicable, all materials used on site will have a low embodied energy; the building envelope will achieve a rating of A+ to D in the BRE's 'The Green Guide' to specification and all the timber used on site will be sustainably sourced from accredited sources.
- 7.225 Additionally, in line with the GLA and RICS guidance, a Circular Economy Statement and whole life carbon analysis has been carried out to establish the waste and embodied carbon footprint and operational carbon of the development over a 60-year lifecycle and various design options to reduce carbon has been considered. Furthermore, the external materials will be specified to have low toxicity to humans and the environment, to be durable to cater for their level of use and exposure and the use of prefabricated materials will be maximised.
- 7.226 Both the construction and the operational waste will be effectively managed in accordance with national and local policy. Every effort has been taken to ensure the majority of demolition waste is reused or recycled with a Pre-demolition Audit has been completed with recommendations for material salvaging and recycling rates. A 95% waste diversion from landfill will be set in compliance with the GLA requirement.
- 7.227 The scheme has been designed to have enough internal space and collection bins for the storage of recycled and compostable materials and waste in the development.

- 7.228 The Proposed Development will minimise where possible, and not increase, sources of noise and vibration during the operational phase of the development. Dust and other air pollution will also be minimised during construction, enforced through the Considerate Contractors Scheme (CCS). Based on the air quality assessment carried out, the development is air quality neutral. Additionally, all external lighting will be designed in compliance with the ILE guidance note.
- 7.229 A Preliminary Geo-Environmental Risk Assessment was carried out and given the potential contaminative previous use, an appropriate Asbestos Survey should be carried out prior to works commencing on site.
- 7.230 An ecologist assessed the site to be of limited ecological and biodiversity importance. Every effort has therefore been taken into consideration to create opportunities for attracting biodiversity and habitat to improve the site ecological value through the inclusion of trees and planting on the pedestrian level and rooftops. The site is achieving an Urban Green Factor of 0.36 (and will continue to target 0.4 through ongoing design development), and biodiversity net gain of over 200%, therefore substantially improving the ecological value of the site.
- 7.231 The above sustainable elements within the proposed development have been assessed in found to be in compliance with national, regional and local planning policies with emphasis on the National Planning Policy Framework (NPPF), the New London Plan (March 2021), the Mayor's Sustainable Design and Construction SPG (2014) and the City of Westminster's City Plan 2019- 2040 including Part D of Policy 38 Sustainable Design Principles.

Energy

- 7.232 An Energy Statement has been prepared by Buro Happold which sets out how the residential and non-residential components of the Proposed Development meet the required targets whilst maximising the potential carbon savings through the following provisions:
- The building fabric is designed following high end industry standards and best practice such as London Energy Transformation Initiative (LETI) as a response to the climate emergency.
 - Passive design measures are incorporated into the design to reduce energy demand and the risk of overheating.
 - A high-performance building services solution is proposed for the Proposed Development.
 - Located at basement and roof 3no. highly efficient Air Sourced Heat Pumps (ASHP) provide primary heating demand, 1 no. 4-pipe ASHP with heat recovery (heat recovery chiller) provides a portion of the cooling demand (35%) and heat harvesting, 1 no. Air-Cooled Chiller provides the remaining cooling load (65%) and
 - 1 no. Water Source Heat Pump (WSHP) provides the heating capacity to match the heat recovery heat rejection for temperature elevation.

- All spaces will include 100% low energy lighting. Occupancy sensing will be specified throughout.
- 313sqm of PV are proposed on the roof of the three proposed buildings
- In addition, a masterplan wide review is considering a potential decarbonisation strategy for WEG

7.233 When reviewing the Energy Hierarchy of LEAN, CLEAN, GREEN when compared to Part L 2021 using SAP 2022 methodologies, the proposed development will achieve a 66% carbon reduction across the whole proposed development. The shortfall to being carbon neutral is met through a required offset payment as set out in Chapter 8 of this Statement.

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

7.235 As such, the proposed strategy has been developed in compliance with adopted London Plan policy SI 2 as set out above, achieving 66% on site reduction in carbon emissions, while adhering to the 'Be lean, be clean, be green' energy hierarchy, and reaching zero carbon aspirations through a carbon offset payment for the shortfall beyond the 66% on site reduction.

7.236 Consequently the proposal is also in accordance with Westminster City Plan policy 36 Energy, which promotes zero carbon development and expects all development to reduce on-site energy demand and maximise the use of low carbon energy sources to minimise climate change effects. The policy goes on to state that proposals should follow the principles of the Mayor's energy hierarchy, and that major developments must connect to existing or planned local heat networks wherever feasible, all of which is met through this proposal.

Transport Assessment

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

Healthy Streets Approach

7.238 The development is proposed to be car free, with the exception of the required disabled parking spaces in accordance with the London Plan 2021 and WCC City Plan Policy 27. Residents and visitors to the scheme are therefore likely to travel sustainably using the wide range of public transport services available near to the site, as well as walking or cycling in accordance with the Mayor's Transport Strategy (2018).

7.239 The design and layout of the site prioritises active and sustainable travel. New direct, high quality and attractive new pedestrian and cyclist access points will be created into

the site, increasing the permeability of the site and improve connections to the wider area.

- 7.240 Internal routes within the site also incorporate the principles of 'safe streets' within the Vision Zero Action Plan (2018). The routes will provide a pleasant walking environment, prioritising pedestrians, with reduced clutter and high quality hard and soft landscaping. Furthermore, the TfL Safer Junction scheme will upgrade the Edgware Road / Harrow junction, reducing the likelihood of collisions with vehicles at crossings, as well as creating a better and safer environment for pedestrian and cyclists.

Car parking

- 7.241 The car park is located at basement level B1 directly under the ground floor slab. Access to the car park is via the vehicle ramp which is entered via Church Street, into and through the existing WEG basement, to which the proposed development connects.
- 7.242 The scheme is car free with 17 accessible parking spaces provided at basement level for both residential and commercial uses. This represents a 3% provision in line with London Plan policy T6.1. These spaces also include compliant electric vehicle charging points in line with the same policy. The remainder of the scheme is car free, which is in line with the residential standards set out in London Plan table 10.3, which supports car free development (as a maximum standard) in the CAZ and areas with excellent public transport accessibility (PTAL 5-6), which applies to the PGPS site. If identified as being required by WCC and GLA officers, it is anticipated that car club membership provisions will be included for residents as part of the legal agreement associated to the development, also in accordance with policy T6.1.
- 7.243 As such the development being car free promotes sustainable transport in line with other policy objectives, focussed on the promotion of cycling, walking and existing public transport network, all of which is significant either as proposed through the development or in relation to existing infrastructure associated to the site and surrounds.

Cycle parking

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

Table 7.1: Short and long cycle spaces

Use	Short Stay	Long Stay
Residential	15	1004
Commercial	66	8
Total	81	1012

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

Public transport

- 7.249 The site has the highest possible Public Transport Accessibility Level (PTAL) at 6b indicating the site has 'excellent' connectivity to the surrounding networks.
- 7.250 The site has two bus stops is close vicinity on Edgware Road and Harrow Road with additional bus stops within a 5 minute walking distance.
- 7.251 The Edgware Road Underground stations are located 200m (Bakerloo Line), and 450m (Hammersmith & City, Circle and District Lines) to the east and southeast of the site.
- 7.252 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. The new Elizabeth Line also provides a connection from Paddington to Heathrow, Reading to the west and Abbey Wood to the east. Services are expected to operate at approximately 34 trains per peak hour. London Marylebone railway station is located approximately 800m to the east of the site.
- 7.253 The nearest station entrance to Paddington from the site is via Paddington Basin, located approximately 650m away. The station is step-free between the platforms and street level; and provides an interchange between the London Underground services.

Vehicular access and servicing

- 7.254 Vehicles can access the basement car park (consented as part of WEG) for parking and deliveries. No parking is permitted on Newcastle Place.
- 7.255 All servicing will take place within the development, ensuring there will be no negative impact on the highways network and local environment. This will be done principally through the proposed connection to the WEG basement (for large scale servicing including waste collection, large scale deliveries), in addition to a small element of on street servicing on Newcastle Place, which is proposed to be stopped up, and will give controlled access to small delivery vehicles alone.

Stopping up of Newcastle Place

- 7.256 It is proposed to 'stop-up' Newcastle Place which is currently Westminster adopted public highway. This road has already been subject to a temporary stopping up order

since September 2020 (for one year and subject to monthly review) to facilitate construction works for WEG.

- 7.257 The stopping up of Newcastle Place will allow the partial pedestrianisation of the space to be delivered (while still maintaining emergency vehicle access), alongside a high quality landscaped public realm space to be provided, and to accommodate the development. Through the public consultation feedback, improvements to the public realm in this area of the site were a high priority and a key concern. The proposals are therefore seeking to directly address this. It is proposed that Newcastle Place will remain one-way westbound for a small number of servicing and delivery vehicles, routed around the northern elevation of Westmark within WEG, facilitating the pedestrianisation of much of Newcastle Place.
- 7.258 Further information on the existing and proposed operation of Newcastle Place and justification of stopping up is contained in Appendix D of The TA report.

TfL Safer Junctions Scheme

- 7.259 TfL commenced construction works of the TfL Safer Junctions scheme at the Edgware Road and Harrow Road junction in January 2020 with the works now complete.
- 7.260 The scheme aims were to reduce road danger and eliminate collisions at the junction, and create safer streets for users to walk, cycle and use public transport. The scheme consists of widening of all pedestrian crossings at the junction, introducing a 20mph speed limit across the junction

Relevant WEG consents

- 7.261 Although already approved under the WEG planning permission, it is still relevant to note the WEG consented scheme safeguarded land to enable future improvement works on Edgware Road. The TfL improvement works involve widening Edgware Road from one to two lanes and providing a raised table pedestrian crossing at Newcastle Place. These changes have therefore incorporated into the landscaping layout for the proposed development.
- 7.262 An on-street loading bay was consented on Newcastle Place as part of the planning application (ref: 16/12162/FULL) to relocate the drop off area and main entrance to Block A of WEG (known as Westmark Tower). This loading bay has been incorporated into proposed layout.

Healthy Streets Checklist

- 7.263 The proposed scheme has been assessed against the checklist which demonstrate that the proposals will improve the Healthy Streets Check score for all three streets surrounding the site, particularly evident on Newcastle Place. The detailed assessment is contained in Appendix F of the TA.
- 7.264 An Active Travel Zone (ATZ) desktop assessment has also been undertaken to appraise the key active travel routes to and from the site. Based on the identified key destinations, five key routes have been identified to capture the key destinations that are most likely to attract active travel trips for the ATZ assessment which are set out within the TA.

Delivery and Servicing Strategy

- 7.265 The proposed approach to deliveries and servicing is in keeping the principles at site one and two of the WEG development. At WEG, a basement servicing area is provided, accessed from Church Street.
- 7.266 All commercial deliveries and refuse collection to take place in the WEG level -2 basement level. Any special residential deliveries or residential move in / move out activities can also be pre-booked in the basement.
- 7.267 Small-scale servicing for residential deliveries will take place on-street on Newcastle Place, around the pedestrianised centre of the street, with vehicles routed in a one way direction from Edgware Road, around the northern façade of the Westmark tower and out on to Paddington Green. This has been developed in consideration of Westminster City Plan policy 29 Freight and Servicing, which requires needs to be met within the development site, through a combination of basement level servicing and integrated discreet ground floor servicing to minimise impact on the public realm and facilitate the pedestrianisation of Newcastle Place.

Construction Access and vehicles

- 7.268 Construction access has been considered in detail in terms of minimising impact on local streets, and taking into account junctions with banned turns and restricted space for manoeuvring large vehicles. The proposed access strategy was discussed with TfL and WCC at a meeting on 26th February 2021.
- 7.269 It is proposed that access to the site will be from the A404 Harrow Road. Three construction site vehicular gates are proposed, with only two in operation at any one time, which will be marshalled to minimise risks of conflicts with pedestrians. The western gate (closest to Paddington Green) will be for entry and the eastern gate (closest to Edgware Road) will be for exit. The locations of the gates aim to maximise stacking capacity within the site and minimise any potential risk of queuing on the public highway. Swept path analysis and further information is contained in the outline/framework Construction Logistics Plan (CLP).
- 7.270 The western gate by Paddington Green will require the temporary closure of the stairs to the underpass. However, the step-free ramp will remain open and pedestrian diversion signs will be provided.
- 7.271 The location of the gate locations do not affect the operation of the bus stops along Harrow Road.
- 7.272 The highest number of vehicles in one week is predicted at this time to be 56. Berkeley has advised that the peak number of daily vehicles should be circa 29. This level of vehicle movement is not expected to have a perceptible impact on the highway network. Measures to minimise the impact of construction are set out in the outline CLP.

Air Quality

- 7.273 Ramboll have undertaken an air quality assessment to understand the significant air quality effects that may arise from the demolition and construction stage and the completed development stage of the proposed development.
- 7.274 During the demolition and construction stage, there is the potential that emissions of dust arising from the site could result in a loss of amenity at nearby existing residential and commercial properties.
- 7.275 Based on recognised assessment criteria, the demolition and construction works present a high risk of adverse dust impacts in the absence of appropriate mitigation. With the implementation of suitable mitigation measures, which have been set out within the ES and would be incorporated within a CEMP to be secured by an appropriately worded condition, it is anticipated that dust impacts would be appropriately mitigated resulting in temporary, medium-term and Not Significant effects.
- 7.276 Predicted generation of HDV movements during the demolition and construction stage has been estimated to increase local flows by a maximum of five vehicles per day. Such an increase would have an insignificant impact on air quality. Construction traffic would also be controlled through the CEMP and CLP. As such traffic emissions generated by the demolition and construction stage would have a temporary, medium-term, negligible adverse impact on air quality which would be a Not Significant effect.
- 7.277 The development would be car-free, with the exception of minimal disabled parking provision and therefore, together with servicing trips, the total vehicle trip generation for the site would be minimal and therefore the effects of the proposed development traffic emissions would be not significant. Overall, the air quality effects of the proposed development on existing off-site receptors would be permanent, long-term Negligible Adverse and Not Significant.
- 7.278 Concentrations of NO₂, PM₁₀ and PM_{2.5} have been predicted at new sensitive receptor locations within the 2022 amended proposed development. At the new residential receptors introduced by the 2022 amended proposed development air quality is predicted to meet all relevant air quality objectives and therefore the 2022 amended proposed development would not introduce new receptors into an area of poor air quality.
- 7.279 Emerging policy and WCC air quality plan commitments has indicated that the 2005 World Health Organization guideline value for PM_{2.5} should be met by 2030. The conservative future PM_{2.5} concentrations with the development complete are predicted to be slightly above the 2005 WHO guideline at some receptors within the 2022 amended proposed development. To ensure appropriate mitigation is provided to those units where façade concentrations are predicted to exceed the guideline, it is recommended that prior to commencement of construction, an up-to-date assessment with the latest monitoring data and modelling tools is submitted to establish the baseline conditions at the time of construction and determine the need for mitigation in the form of PM_{2.5} filtration. The updated assessment could be secured by means of an appropriately worded planning condition.

- 7.280 The air quality neutral assessment has shown that the proposed development would meet both the building and transport emissions benchmarks and can be considered Air Quality Neutral, which is in accordance with Westminster City Plan Policy 32 Air Quality, which requires major development to be air quality neutral. Mitigation measures will include ground floor landscaping and screening which seek to deliver air quality benefits within the public realm.

Noise Assessment

- 7.281 The site has been assessed from a noise perspective to understand the effect of noise sources on the proposed residential development (as the most noise-sensitive of the proposed uses) have been assessed in line with BS8233:2014 and Professional Practice Guidance (ProPG) on Planning and Noise developed by the Institute of Acoustics (IOA) and the ANC Acoustics, Ventilation and Overheating Residential Design Guide. This is set out in the Environmental Statement Technical Appendix 8.5.
- 7.282 The report concludes that based upon measured noise levels and modelling of the cumulative traffic flows, the ambient noise levels on the proposed building facades have been predicted. Minimum sound insulation performance requirements have been provided for the façade to achieve internal noise levels as per BS8233:2014 and ProPG.
- 7.283 This would be further developed during detailed design and secured by means of an appropriately worded planning condition. In respect of external noise levels, the proposed development has been designed to achieve the lowest practicable levels in the proposed external amenity spaces, as recommended within BS 8233:2014, and alternative quieter external amenity areas are available in the vicinity.
- 7.284 On this basis the site is considered suitable for residential development from an acoustics perspective and the effects would be minimal in line with Westminster City Plan policy 33 Local Environmental Impacts (part C specifically).
- 7.285 Operational plant rating limits have been set in accordance with BS414:2014+A1:2019 and WCC requirements. All fixed plant installations would be fitted with attenuation and acoustic screening, as required to meet the noise emissions limits. Mitigation would be developed during detailed design and the required noise levels would be secured by means of an appropriately worded planning condition. On this basis, the effects would be Negligible Adverse, i.e. not significant, therefore accord with Westminster City Plan policy 33.
- 7.286 In addition, the proposed stopping up of Newcastle Place would deliver local environmental benefits by controlling vehicular access, which is then beneficial for local air quality and noise impacts in line with Westminster City Plan policy 33.

Fire Safety

- 7.287 London Plan Policy D12 states that all development proposals must achieve the highest standards of fire safety, are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire and re constructed in an appropriate way to minimise the risk of fire spread.

- 7.288 Furthermore, Policy 12 of the City Plan requires housing to be designed to a standard that ensures safety to its occupants.
- 7.289 Following discussions with the GLA in 2022, a number of design changes have been incorporated to further maximise the fire safety of the development, which includes the inclusion of a second stair core to each block.
- 7.290 Fire statements have been prepared by AESG, to address fully both London Plan Policy D12 and National Gateway One requirements, which demonstrate that the proposals have considered fire safety at the earliest stage, and the further development of the fire strategy will be based upon these principles and the construction method proposed at detailed design stage. The fire strategy will be further developed for submission to the Building Control at the appropriate time and will meet the functional requirements of the Building Regulations and London Plan Policy.
- 7.291 The proposals are therefore considered to incorporate the highest standards of fire safety, and are fully acceptable in line with London Plan and City Plan requirements.

Statement of Community Involvement

- 7.292 A Statement of Community Involvement report has been prepared by Concilio which sets out the consultation process and objectives, key themes that have emerged from discussions with various key stakeholders and the local community, the response and feedback and summary of changes.
- 7.293 Numerous stakeholder meetings have taken place virtually since August 2020, along with the creation of a consultation website which set out the proposals via exhibition boards and accepted comments. Formal consultation and webinar events were also held virtually.
- 7.294 The consultation strategy has sought to engage with a wide range of stakeholders, including locally elected politicians, community groups, residents and visitors to the area using a range of communication methods. The digital nature of the consultation, virtual events and survey responses have been well viewed and easily accessed
- 7.295 Two phases of consultations were undertaken in order to ensure an iterative approach to engagement, genuinely seeking to understand the views of the local community and where possible incorporating these views into the emerging proposals.
- 7.296 Further public consultation has been undertaken in Autumn 2022 with local stakeholders including local amenity societies, and a general public consultation process involving a public exhibition, online webinars, an updated consultation website and other engagement.
- 7.297 The principle of redeveloping the site to complete the WEG Masterplan has been supported throughout the process, as have the significant public realm improvements and the affordable housing contribution.
- 7.298 Through this collaborative approach, the scheme has evolved and a wide variety of comments have been able to be taken on board, with further details of this evolution

set out within the DAS and Section 5 above. Engagement with the local community and stakeholders will continue following the formal planning submission and throughout the planning process.

8. CIL and Planning Obligations

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

Community Infrastructure Levy

- 8.3 Westminster's CIL charging schedule sets differential rates for use classes and different areas of the City. The site falls within the 'Residential core' charging zone, for which liable residential floorspace is charged at £400/sqm, and liable commercial floorspace is charged at £150/sqm.
- 8.4 The Mayor of London Community Infrastructure Levy 2 Charging Schedule came into effect on 1 April 2019, and in Westminster (within Band 1) a flat rate of £80 per sqm is set for all uses (except for office, retail and hotel in Central London and for health and education in all of Greater London. Office use is set at £185/sqm and retail is £165/sqm.
- 8.5 A CIL 'additional information' form is submitted with this application, setting out the existing and proposed floor space figures relevant to calculating the liable amount relating to the Proposed Development.
- 8.6 A cover letter accompanied the CIL additional information form setting out the intention that the application be treated as being a phased development for the purposes of CIL. This is also set out in Chapter 4 'Proposed Development' of this planning statement which includes the construction phasing plan and sequence of delivery, and is also set out in the accompanying ES.

Planning obligations

- 8.7 The City Council is restricted on the use of planning obligations through regulation 122 of the CIL Regulations 2010 (as amended) relating to items of infrastructure. The City Council published a consultation draft updated Planning Obligations and Affordable Housing SPD in March 2022, which the applicant made comments on. However, following a change in the administration of Westminster City Council following the local elections in May 2022, this document is not being taken forward in its current form and holds no weight in decision making.

8.8 Through determination of the initial application submission, the Heads of Terms (HoTs) that are likely to form part of a Section 106 agreement with the GLA and Westminster City Council are as follows (in draft with discussions on the heads of terms ongoing):

- Provision of 219 affordable units on-site comprising 109 socially rented units and 110 intermediate units. The affordable units to be provided at affordability levels to be agreed with the Head of Affordable Housing and Partnerships;
- Provision of an early-stage viability review mechanism, in accordance with policy H5 of the London Plan and the Mayor's Affordable Housing and Viability SPG;
- Developer undertaking to use best endeavours to secure nomination rights to 68 intermediate affordable homes within the London Borough of Barnet;
- Payment of a carbon offset payment of £491,603 (index linked) payable on commencement of the development;
- Payment of a financial contribution of £137,992 (index linked) towards additional play facilities within the vicinity of the site and payment on commencement;
- A Walkways and Cycling Agreement to safeguard publicly accessible routes through the site;
- Highways works associated with the development on Paddington Green, Harrow Road and Edgware Road;
- Contribution to the improvement of the subway between Harrow Road and Paddington Basin (TBC);
- A scheme for the relocation of the existing concrete sculptural relief panels from the southern flank walls of the existing building to a location either on-site or nearby, or a combination of both, including provision of site-interpretation information at the developer's expense;
- Submit an Employment and Skills Plan and a financial contribution of £235,616 towards the Westminster Employment Service prior to commencement of development. However this may be provided on site in-kind through agreed employment and training measures, subject to agreement;
- Provision of a Car Parking Design and Management Plan for parking for the proposed development, within the WEG developments basement levels prior to first occupation;
- Community use specification;
- Night-time walking off site improvements contribution (TBC);
- Provision of a Delivery and Service Plan for deliveries and servicing for the proposed development within the WEG developments basement levels prior to first occupation; and

- The cost of monitoring the s106 agreement

8.9 As set out earlier in this chapter, and in Chapter 4 'Proposed Development', it is the intention that this be a phased development, to be captured through a relevant planning condition as appropriate, subject to agreement with the LPA. In terms of the above planning obligations and financial contributions, it may be the case that some will be phase specific, while others may apply site wide. As such the applicant will work with the LPA to agree the relevant and appropriate approach for each relevant element of the planning consent taking in the S106 agreement and associated heads of terms, and likewise in terms of the wording and application of planning conditions.

9. Public Benefits Summary

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

assets. They are further articulated and presented in detail in the accompanying Economic and Full Circle Assessment by Turley.

PGPS – Economic Benefits

- 9.7 The proposal will deliver a employment generating uses, specifically 1,100 sqm of flexible commercial/town centre uses. As set out in the accompanying Economic Assessment this will lead to the generation of significant new employment opportunities, equating to around 60 operational jobs in this new employment floor space, in addition to employment opportunities relating to the management of the site and individual buildings on top of this.
- 9.8 Of course in addition to job creation, the commercial uses will drive economic growth and economic output generally, contributing to the diversity of Westminster's economy, and that of the north west of Westminster.
- 9.9 Importantly, the construction phase will also deliver 450 jobs to the local area, while also providing extensive apprenticeship and training opportunities, which will be crystallised through the submission of a formal employment and skills plan, and building on the significant opportunity created already through the West End Gate development. The proposal will also deliver a significant Employment and Training contribution as set out in Chapter 8, in line with Westminster's Inclusive Economy Guidance.
- 9.10 Separately, the introduction of a significant new residential community at the site will drive and deliver additional spend to the local area including the Church Street/Edgware Road District Shopping Centre. Again this is articulated in the supporting Economic Assessment that forms part of the planning application.
- 9.11 The flexible commercial space will also drive business rates for the City of Westminster and Treasury, in addition to the New Homes Bonus generated by the significant housing delivery through the proposal.
- 9.12 In addition, the Proposed Development generates over £20million in Community Infrastructure Levy for investment in the local area and Westminster more generally, and for the Mayor of London, while a number of other financial contributions are set out in the preceding chapter, which will be spent on or directed to specific items or initiatives.

PGPS – Social Benefits

- 9.13 The social benefits of the PGPS development are significant and have been enhanced through this amended proposed development, focusing on the strategically significant level of housing delivery that is proposed, comprising 556 new homes to Westminster, representing 56% of one year's worth of Westminster's London Plan target for housing delivery, and 61% of Westminster's annual affordable housing target of 345 homes. This should also be considered in the context of Westminster's recent under-delivery of affordable housing against its policy targets, as set out in Chapter 7 of this statement.
- 9.14 This planning application was called in by the Mayor of London at Stage 3 due to the nature and scale of the proposed development, including its potential contribution to

the delivery of housing and affordable housing at a borough and London-wide level, which is such that it has a significant potential impact on the implementation of the London Plan in terms of provision of new homes and affordable homes. Based on the above this is unquestionably the case with the proposed development, and the public benefit in this regard is substantial and of strategic, London-level importance.

- 9.15 The housing provision includes 38% on site affordable housing (by habitable room, 39% by unit) as set out in this statement, in excess of policy requirements, with additional provisions for Westminster workers and residents to have access to MOPAC's wider off-site provision. The on-site provision includes 60% social rented housing by habitable room, meeting local identified need and further facilitating the delivery of Westminster's Church Street Masterplan as set out below and earlier in this statement.
- 9.16 The housing delivery supports the delivery of a mixed and balanced community as reflected in the housing mix and diversity of housing proposed. This includes significant private, social and intermediate housing (including shared ownership and rental products), and a wide range of unit sizes including studio homes in the private residential element, and a policy compliant proportion of family sized homes (at 25% of units) and wheelchair accessible and adaptable dwellings. All residents will benefit from private amenity space, and access to communal amenity spaces in the development, while also having access to private residential amenities.
- 9.17 In addition, the quality of the residential proposed has been enhanced through the proposed revisions, with an increase in dual aspect units, provision of residential storage spaces, increase in separation distances and outlook between blocks, and other design enhancements. The blocks have also been re-designed in line with fire safety requirements, introducing a second stair core.
- 9.18 The importance and benefit of PGPS extends well beyond its site boundary, and like West End Gate, is essential to facilitate the delivery of Westminster's Church Street Masterplan, particularly from a social aspect. PGPS will deliver significant affordable housing which is anticipated to be taken on by the City Council as decant accommodation for existing Church Street tenants, who will move to the new accommodation at PGPS. This will allow the Church Street sites to be redeveloped and the aspirations of the Church Street Masterplan to be delivered.
- 9.19 The residential offer is one of a scale and variety that is seldom seen in private sector led residential development in Westminster, and has been developed closely in line with policy and aspirations for this public land site.
- 9.20 Additional social benefits are delivered through the provision of the wider place making aspects of the Proposed Development which will support and foster health and wellbeing, including the landscaping, play space and public open space as detailed below, addressing and repairing the townscape and negative impact that the former secure police station had on the public realm and environment.
- 9.21 The proposed ground floor uses will also provide valuable local services for the local community, including shops and other uses, in addition to the community use, which is being developed in support of the local community as set out above.

PGPS – Environmental Benefits

- 9.22 Like stage 1 and 2 of West End Gate, the environmental benefits that will be delivered through PGPS are significant, representing a continuation of what is being delivered at WEG, and being in line with the Council's aspirations for Church Street, the Edgware Road/Harrow Road junction, and for the stretch between the site and the Travis Perkins building in Paddington. The environmental benefits have been significantly enhanced through the amended 2022 proposed development as set out in this statement and wider planning submission.
- 9.23 The proposal firstly will replace outdated and poor quality buildings that are a negative townscape feature with buildings of high quality sustainable design and architecture. The proposals will deliver both heritage and townscape benefits as set out in the accompanying Heritage Statement and within the ES, including to a number of views, and to the setting of Conservation Areas (including the Paddington Green Conservation Area) and Listed Buildings. This primarily results from the replacement of detracting, poor quality existing buildings with new buildings of high architectural quality.
- 9.24 Within this amended proposed development, the height, bulk and massing of the three buildings has been revised in line with extensive GLA and LRP consultation, to address previous concerns around coalescence in long views and therefore to deliver enhanced townscape benefits.
- 9.25 The proposal will repair and address the significant shortcomings associated to the previous high security police station function of the site, and will deliver:
- High performing, sustainably designed buildings, with a revised energy strategy based on on-site ASHP and WSHP, with PV on site renewable generation, collectively delivering on site carbon reduction of 60% against Part L requirements.
 - Significant carbon reduction (as above, with associated carbon offset payment), air quality neutral, significant active and passive sustainability measures integrated into the design, in addition to measures to control overheating.
 - Significant biodiversity net gain and urban greening, with an increase in UGF beyond policy required level.
 - New pedestrian and cycle routes through and around the site, including between the three proposed blocks. Significantly improved legibility, including the creation of a new pedestrian route between Block J and K, and all underpinned by the proposed partial pedestrianisation of Newcastle Place
 - 69% of the application site area now comprises public realm, with a significant reduction in the size and form of the built footprints (increase in public realm area of 53% in comparison to the 2021 submission).
 - On street cycle parking, off street cycle parking and facilities for residential and commercial uses. Off street servicing of the development. Associated cycle parking contribution to TfL.

- Car free development (aside from nominal disabled spaces), to the benefit of air quality and local environment.
- Stopping up of Newcastle Place and its part-pedestrianisation, with restriction on access limited to pedestrians, cycling and servicing (servicing route runs around the north elevation of Westmark tower).
- Significant new landscaping and greening to Newcastle Place including new seating, tree planting, lawns, water features and public art.
- Enhanced on site play space, provided at the heart of the pedestrianised Newcastle Place space.
- Significant tree planting around the site – 77 additional trees, all 6 existing are retained.
- New public plaza on the corner of Edgware Road and Harrow Road in front of Block K, with associated planting, seating, and public realm.
- Private amenity space associated to each new home.
- Communal residential amenity space in Block K for private residents.
- Use of high quality materials around the site, with maintenance by the applicant.
- Active ground floor uses, with associated landscaping proposals creating a safe environment.

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

Bullet Point Summary of Public Benefits

- Strategically significant housing delivery of London-wide importance, delivering 556 new homes in total.
- 219 affordable homes on site, 38% on site affordable housing provision (by habitable room, 39% by unit) comprising 60% social rented and 40% intermediate homes (by habitable room).
- Associated nominations agreement giving Westminster priority access to off site affordable housing in Barnet.
- Policy compliant affordable tenure mix, with unit mix reflecting local need.
- Supporting the delivery of Westminster's Church Street Masterplan.
- High quality new homes including private and communal amenity space, and residential amenities.
- Wheelchair accessible and adaptable homes.

- Apprenticeship, training and skills opportunities, over 450 construction jobs. Associated local employment and training financial contribution.
- New retail and town centre uses providing local services and employment opportunities (60 on site jobs) and an active ground floor.
- Provision of a community use within Block I.
- Increased spend in the local area, including to Church Street District Centre.
- Business rates generation for Westminster.
- Replacement of existing poor quality buildings and environment with high quality, sustainable buildings and environment.
- Associated Heritage and townscape benefits to the setting of several assets.
- Stopping up and part-pedestrianisation of Newcastle Place, provision of significant new public realm, landscaping and greening around the site, new seating and dwell/amenity spaces, over 1000 sqm of on site play space, prioritised to younger children.
- New pedestrian routes through and around the site, further opening up of the site with 69% of the site area comprising public realm.
- New and additional cycle routes through and around the site.
- Over 1,000 cycle parking spaces at basement level and in the public realm.
- Car free development, aside from disabled parking provision.
- Public art and new public spaces, including a central landscaped garden route through Newcastle Place, a new plaza on the corner of Edgware Road and Harrow Road, and a new public garden fronting Paddington Green
- Planting of over 77 new trees around the site, retention of all existing trees,
- New safe lighting and accessible, safe and inclusive environment.
- Total CIL Payment of circa £20m.
- Play space contribution in addition to significant on-site provision.
- 66% carbon reduction on site.
- Carbon offset contribution to achieve carbon neutral.

10. Summary and Conclusions

- 10.1 The redevelopment and delivery of Paddington Green Police Station represents a significant opportunity for housing delivery of a scale and nature of London-wide importance, and more locally for Westminster and the local Church Street Area, completing Berkeley's long held wider West End Gate Development, the early stages of which are currently being delivered. The wider West End Gate Masterplan represents Westminster's single largest housing site by some distance, and an opportunity for transformative placemaking to be delivered to the local area.
- 10.2 The opportunity at PGPS arises from the decommissioning of the former high security police station as part of the estate strategy from the MOPAC. This involves the disposal of surplus sites, and general reconfiguration and enhancement of the estate to best meet London's policing needs. As set out in this Planning Statement, the loss of the police station therefore complies with Westminster policy, and has been agreed with the Mayor of London.
- 10.3 The vacated surplus, brownfield site therefore represents the opportunity for Berkeley to bring the site back into a viable use, and deliver of a transformative proposal that repairs the secure island site associated to the former use, demolishes the existing poor quality buildings, and delivers a residential-led mixed use redevelopment of the site that will deliver a range of public benefits that are of London-wide importance.
- 10.4 The site is identified as one that is suitable for the location of a tall building, taking into account the site's context and setting, and its key gateway location on one of the key entry points into the centre of Westminster, while benefitting from exceptional public transport accessibility. This sets the framework for the delivery and optimisation of what is a key site for the delivery of Westminster City Plan and London Plan policy objectives, and for public land.
- 10.5 The proposed development has evolved significantly following extensive engagement with the GLA and the LRP since Westminster's planning committee in September 2021. The GLA engagement process has delivered significantly enhanced public benefits through the revised proposed development, with an emphasis on delivering significant enhancements to townscape views and public realm and landscaping within the site through revisions to the height, bulk and massing of the buildings, and to address concerns around coalescence of the proposed massing. This has also facilitated further enhancements to the quality of the proposed homes within the development. At the same time, the affordable housing provision has been revised to deliver an increase in social rented housing on site, now comprising 60% of the proposed affordable housing on site, which is a significant enhancement.
- 10.6 Environmental enhancements have been significant, with a new energy strategy delivering significant on-site carbon savings, while the public realm enhancements are significant and wide ranging, including the part-pedestrianisation of Newcastle Place, the provision of new and more contextually defined spaces around the site, active ground floor uses including community use, and the further opening up of the site to the benefit

of the public realm, residential quality, and also to the benefit of neighbouring residents, mitigating the impact of the proposed development. Planning Balance/Summary

- 10.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. As set out through this statement, the revised scheme for PGPS has been developed in close consideration of the adopted development plan framework. The proposal meets and exceeds the requirements of a number of local and strategic level policies, and the associated public benefits being delivered through the scheme are considerable and wide ranging, and which have been enhanced through the revisions made to the scheme in consultation with the GLA and other stakeholders as set out above.
- 10.8 The NPPF states under Paragraph 11 that development proposals that accord with an up to date development plan should be approved without delay, while more generally Paragraph 8 sets out the golden thread of achieving sustainable development, and the three overarching objectives of the planning system, which is to deliver economic, social and environmental benefits. However, the extensive public benefits of the proposed scheme must be weighed against any harm.
- 10.9 At the same time, paragraph 196 relating to heritage and conservation states that where development proposals result in less than substantial harm to identified heritage assets, this harm should be weighed against the public benefits of the proposal. The Heritage Assessment forming part of this application identifies that the amended proposed development results in less than substantial harm to the character and setting of the Grade II Listed Terrace on Warwick Avenue (namely numbers 14 and 16), and a low degree of less than substantial harm to the Regent's Park Conservation Area and Registered Park and Garden
- 10.10 Conversely, the Heritage Assessment and ES identify a number of heritage and townscape benefits delivered through the amended proposed development, resulting predominantly from the replacement of the existing detracting building with replacement buildings of high quality architecture. Townscape and Visual benefits are identified to a number of identified viewpoints, while Heritage benefits are delivered to the setting of the Paddington Green Conservation Area, the listed buildings fronting Paddington Green, the grade II* listed Marylebone Lower House North Westminster Community School, and the grade II* Church of St Mary. The proposed public realm enhancements to Newcastle Place would also have a direct beneficial effect on the Paddington Green CA.
- 10.11 More generally, the public benefits delivered through the proposed development are substantial and wide ranging as set out in the previous chapter and throughout this Planning Statement, and are considered to outweigh this identified heritage harm, which is considered to be at the low end of less than substantial.
- 10.12 The Replacement ES also acknowledges some impacts in relation to Daylight and Sunlight on certain neighbouring properties as a result of the proposed height, bulk and massing of the proposal, although reductions and retained values are largely appropriate for the context, and the level of impact has reduced through the amended proposed development. The proposed heights have been found to be in accordance with London

Plan Policy D9, but do represent a diversion from Westminster's Policy on appropriate height on the site, however those heights set out in policy represent the massing already present on the site, and if adhered to would not result in a deliverable or viable scheme, or result in the optimisation of the site and public sector land.

- 10.13 The amended proposed heights have been developed in the context of detailed analysis of the surrounding built environment, and in close consideration of the London Plan tall building policy as set out in this submission, and in close consultation with GLA officers and the LRP.
- 10.14 The amended design has evolved through the GLA Stage 3 process and the architecture and design of the proposal has also evolved, to deliver landmark buildings of the highest quality sustainable design and architecture.
- 10.15 The heritage and other elements of harm should be balanced against the public benefits being delivered through the scheme. These are considerable and wide ranging as set out in Chapter 9 of this Planning Statement for both the local area, primarily in relation to the delivery of a level of housing delivery that is of strategic London-level importance in line with London Plan housing delivery targets, which is also critical to the delivery of Westminster's neighbouring Church Street Masterplan.
- 10.16 The key elements revolve around the delivery of a strategically significant number of new homes, 556 in total, including 38% on site affordable housing, in line with policy requirements and the MOPAC portfolio agreement. The housing choice is significant and diverse and has been developed in line with local need, comprising a range of private, social rented and intermediate homes, including family sized accommodation, wheelchair accessible units, in tenure blind buildings of high quality, sustainable architecture. The applicant is also working with the GLA and MOPAC to secure nomination rights for Westminster residents and workers to MOPAC's wider portfolio of affordable housing delivery, principally in LB Barnet.
- 10.17 Fundamentally, the delivery of PGPS and the wider West End Gate Masterplan is essential for the delivery of London Plan housing delivery targets, and for Westminster's Church Street Masterplan. PGPS will provide affordable homes that will be taken on by Westminster for existing Church Street tenants, as is the case with West End Gate, which will free up sites within Church Street for redevelopment, while providing these residents with new, high quality homes adjacent to their current home.
- 10.18 The economic benefits of the scheme are also significant, delivering a number of employment and training opportunities for the local and wider area through the construction phase, and also in the completed development through the proposed range of commercial uses which include retail and other town centre uses in addition to community use. This will drive business rates and other benefits for Westminster, and also deliver significant additional spend to the Church Street/Edgware Road shopping centre from the resident population at PGPS.
- 10.19 The enhanced environmental and wider place making benefits are potentially the most significant when considering the existing poor quality building and environment which is hostile and very 'hard', reflecting the former high security police function. The amended proposal will deliver high quality, sustainable buildings that will deliver townscape and

heritage benefits, replacing the existing detracting poor quality buildings with high quality alternatives, and deliver a highly sustainable revised energy strategy. The island site will be opened up through a pedestrian's first approach revolving around the stopping up and part-pedestrianisation of Newcastle Place, the significant increase in public realm area within the site boundary, further revision to the buildings delivering new and additional routes through and around the site for pedestrians and cyclists, connecting Edgware Road and Harrow Road through to the West End Gate site and Paddington Green importantly.

- 10.20 This will principally be delivered through the stopping up, partial pedestrianisation and significant landscaping to Newcastle Place. New lawns, seating, play space, public art and other features will be delivered, while access will be for pedestrians, cyclists and servicing only, with no access for general traffic. New routes between every building will be delivered providing further dwell spaces and pedestrian routes, while a new public plaza will be created on the corner of Harrow Road and Edgware Road, and a new public garden fronting Paddington Green, accompanied by significant greening, tree planting, seating and public realm improvements, complementing the active town centre uses that feature around the base of each building.
- 10.21 More generally the scheme is car free and promotes walking and cycling, will deliver significant and increased carbon reduction on site in line with policy and significantly in excess of Part L requirements, with a revised ASHP and PV based energy strategy. The proposals deliver significant biodiversity net gain and urban greening, and delivers a range of private and communal amenity space for residents, alongside public open space and public realm.
- 10.22 On balance, it is considered that the public benefits are significant and wide ranging and have been further enhanced through the 2022 amended proposed development, of a scale that is rarely seen in Westminster, and which are of strategic significance for London and the implementation of the London Plan. The substantial public benefits are considered to outweigh the identified harm caused by the development, namely the identified lower end less than substantial harm to the Grade II Listed Terrace in Warwick Avenue and the Regent's Park Conservation Area and RPG. As such, in line with the NPPF it is considered that the proposals represent sustainable development in accordance with Local, Regional and National policy and should be supported.

Appendix 1: Tall Buildings Policy Assessment – Montagu Evans



PADDINGTON GREEN
POLICE STATION

Tall Building Policy Assessment

Tall Building Policy Assessment—
November 2022 - GLA0711

NOVEMBER 2022

PADDINGTON GREEN POLICE STATION

TALL BUILDINGS POLICY ASSESSMENT

15 NOVEMBER 2022



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1.0 INTRODUCTION AND PURPOSE OF DOCUMENT

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

1.2 The description of development is:

“Demolition 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 2022 amended proposed development”).

1.3 Our approach to the assessment of the acceptability of the 2022 amended proposed development started with an assessment of the suitability of the site for tall buildings given the site’s characteristics and the adopted planning policy related to the site.

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

1.5 With regards to the policy position, and as indicated above, the site’s suitability for a tall building has been carefully considered through a thorough understanding of the applicable Development Plan Policies. The adopted policies of the statutory local plan (including the Westminster City Plan 2019-2040) and the London Plan (2021) support the optimisation of housing density at High PTAL sites and adjacent to public transport nodes, and the site is allocated as being appropriate for tall buildings in Local Plan Policy 41 (Building Height). This was explicitly acknowledged by the GLA during pre-application discussions and further consultation post-submission, and the nature and scale of the transformative change promoted by the applicant and the technical team throughout the pre-application and post-submission consultation has been supported by the GLA.

1.6 The scale of the 2022 amended proposed development has been revised in response to comments from GLA, and while the proposed scale exceeds what is specified at Policy 41 of the City Plan, the GLA accepted during post-submission consultation that this would be acceptable if the scheme delivers exceptional public benefits. We note also that the GLA has not expressed any strategic concern with the principle of the heights proposed during design development, with discussions focussing on form, bulk, massing and townscape/ visual effects. The Planning Statement prepared by Turley explains these exceptional public benefits. The 2022 amended proposed development in terms of height and scale is an appropriate level and form of development for this significant site and will bring about transformative change in the area. Our assessment of the effects of the scheme has been carried out in accordance with principles on landscape and townscape assessments as set out in the Landscape Institute and Institute of Environmental Management and Assessment ‘Guidelines for Landscape and Visual Assessment – Third Edition’ (GLVIA) (2013).

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

- 1.8 The site does not lie in any locally designated viewing corridors nor in strategic views as identified by the London View Management Framework (2012). The site does lie in the periphery of the LVMF view 4A.2 which has been tested as part of the visual impact assessment.
- 1.9 The 2022 amended proposed development is considered expressly against the criteria of the local tall buildings policies of the Westminster City Plan 2019-2040 and the London Plan policy D9 (Tall Buildings) below.

2.0 VIEWS POLICIES

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

LONDON PLAN (2021)

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

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

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

Westminster's City Plan 2019-2040 (2021)

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

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

- 2.6 The 2022 amended proposed development will not affect strategic viewing corridors or locally designated views. The tallest building (Block K) will necessarily be visible from local viewpoints owing to the nature of the surrounding townscape

and the topography, and the scale of the proposed development. The form of the buildings, which are of varied heights, have been designed to maximise their slender proportions and to reduce the impression and appearance of the new massing. The approach has evolved through consultation with the GLA, to create a clear differentiation between the three proposed buildings and the existing WEG Block A, and to differentiate the top, middle and bottom of each building.

- 2.7 It is our judgment that there will be considerable improvements to local views of the site following the redevelopment of the police station, which is currently a detracting and largely disused feature in the streetscene, with new buildings of high quality design that deliver new commercial uses at ground floor level and new public realm in the environs of Newcastle Place.
- 2.8 The arrangement of the blocks within the Site has also been carefully considered to provide high quality public realm and improve the pedestrian experience and permeability at ground floor.
- 2.9 Key to our analysis of the proposals has been the potential for effects on the Paddington Green Conservation Area (CA). The CA is characterised by a range of mansion blocks and 19th century developments focussed on the landscaped public open space at Paddington Green, which has a strong urban park character. Views through and out to the south of the CA are sensitive and have been the subject of views analysis and townscape assessment (see in particular views 16, 17, 18 and 32).
- 2.10 It is judged that views towards the site at ground level would be improved through the addition of high quality architecture. The surrounding context has undergone significant regeneration in recent years, and the proposed uses of the development are complementary to those in the CA. The additional activity and new architecture on the Site, where this is currently a detracting element in the setting of the CA, would be an improvement in this context. The visibility of the proposed development from some locations within the CA will not affect the intrinsic qualities which comprise its character and appearance.
- 2.11 The proposed development would not affect any recognised silhouettes, Strategically Important Landmarks or Landmark Viewing Corridors. It would appear as part of the wider panorama and in the periphery in one LVMF Vista (4A.1, Primrose Hill), but outside the viewing corridor, and the viewpoint is orientated to the south-west towards the site, so that the principal landmarks, including St Paul's Cathedral and the Palace of Westminster are not visible in the frame of view. The proposed development would be experienced as part of the existing urban development which characterises this part of the view. Our ES assessment finds that the effect would be negligible, owing to the limited nature of the change to the scene as a whole, and the character and composition of the view would be preserved.
- 2.12 Overall the ES assessment finds no significant adverse effects on visual amenity or visual receptors. The proposed development is therefore consistent with London Plan Policies HC3 and HC4, and Policy 41 of Westminster's City Plan.

3.0 TALL BUILDING POLICIES

- 3.1 Below we provide an assessment of the acceptability of the 2022 amended proposed development in accordance with the policies of the Development Plan which concern tall buildings.
- 3.2 Our assessment of the effect on townscape character and visual amenity has been informed by the analysis carried out in volume 2 of the ES Volume.

LONDON PLAN (2021)

Policy D9: Tall Buildings

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

'Locations

B

- 1) *Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.*
- 2) *Any such locations and appropriate tall building heights should be identified on maps in Development Plans.*
- 3) *Tall buildings should only be developed in locations that are identified as suitable in development plans.*

- 3.4 The site is located adjacent to but outside the Paddington Opportunity Area (OA); so London Plan Policy SD1 (Opportunity Areas) does not apply to the Site. The Harrow Road/Westway forms the northern boundary of the OA. The site is located within the Church Street/ Edgware Road Housing Renewal Area Policy 6 of the Westminster City Plan 2019-2040) which sets out a series of priorities for development in the Area. These are:

A. At least 2,000 high quality new homes, in accordance with the Church Street Masterplan.

B. At least 350 new jobs and linking further employment opportunities in the CAZ to the local community.

C. Community facilities, including a new health and well-being hub.

D. New green infrastructure and public realm improvements, including a north-south green route or 'green spine'.

E. Improved mobility through infrastructure improvements to support active travel.

F. Innovative and high-quality design to ensure the most efficient use of land, including tall buildings.

G. Enhancements to Church Street / Edgware Road District Centre, including improved facilities for Church Street Market.

- 3.5 Also of relevance to the proposals, Westminster Policy 5 encourages development that improves the quality and tenure mix of housing, addresses the severance caused by the Westway (A40) and Harrow Road (A404) and improves public realm.

- 3.6 Policy 41 of the City Plan identifies that tall buildings may be appropriate at the Marylebone flyover/ Edgware Road junction, where the site is located. The detail of Policy 41 is addressed in more detail below.
- 3.7 Policy 42 identifies that in the Church Street/ Edgware Road Housing Renewal Area there are opportunities for taller buildings where they contribute to the creation of a place with a strong and enhanced character, specifically at the main east-west route and commercial focus of the area. An extract of the map of the Paddington Opportunity Area, Marylebone flyover/ Edgware Road junction and Church Street Renewal Area is reproduced below at Figure 1, which illustrates that the site is at the fulcrum of these areas identified as appropriate for tall buildings.

Impacts

C

1) Visual impacts

- a. The views of buildings from different distances:*
- i. Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.*
 - ii. Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality*
 - iii. Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height of parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*
- b. Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding*
- c. Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan*
- d. Proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.*
- e. Buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it*
- f. Buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river*
- g. Buildings should not cause adverse reflected glare*
- h. Buildings should be designed to minimise light pollution from internal and external lighting*

- 3.8 The visual impact of the proposals is discussed in full above. Parts e and f of the policy are not relevant as the site is not situated in the Thames Policy Area or in the setting of a World Heritage Site.
- 3.9 The 2022 amended proposed development will result in transformative change to the character and activities on and in the immediate environs of the site, as encouraged and promoted through the West End Gate masterplan. The comprehensive approach to the redevelopment and the scale of the change means there will inevitably be some effects on townscape and visual receptors. These have been rigorously tested through the pre-application and post-submission consultation process and through the formal visual assessment of the scheme both on local and strategic viewing corridors, looking at local, middle and long range views as required by London Plan Policy D9. This has included the addition of supplementary views which were requested by the GLA during determination, informed by a Zone of Visual Influence (ZVI) drawing.
- 3.10 The existing building at Paddington Green Police Station is 17 storeys, and is adjacent to the West End Gate Masterplan, where buildings range in height from 4-30 storeys. To the north of the site are several Westminster owned tall buildings including Parsons House on Edgware Road, in addition to Kennet House on Church Street, and the taller buildings that mark the wider Edgware Road/Harrow Road junction. This is set out in greater detail in the Design and Access Statement by Squire & Partners.
- 3.11 The Paddington Basin to the south culminates in the Merchant Square development, at 41 storeys. The increase in height in this area provide an opportunity to provide an appropriate response to the context, marking a gateway of metropolitan importance, where the Edgware Road, one of the main routes north (and a Roman road), meets the Westway, one of the main routes west. We consider therefore that the proposals meet the salient elements of Part C 1(b) of the Policy D9.

2) Functional impact

- a. The internal and external design, including construction detailing, the building's materials, and its emergency exist routes must ensure the safety of all occupants*
- 3.12 Evacuation from all buildings is via stairwell, and protected refuges for the mobility impaired are included. As set out at Section 5.22 of the Design and Access Statement, all residential building cores will be firefighting cores, including firefighting stairs, lifts and wet risers, and will be accessible for fire tenders from Newcastle Place. The Fire Statement by H+H provides a full account of the measures taken to provide safety, with the inclusion of a second stair core.
- b. Buildings should be serviced, maintained and managed in a manner that preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and buildings management arrangements should be considered at the start of the design process*
- 3.13 The proposals have been developed in liaison with the Westminster Highways and Design Case Officers, and since submission with the GLA Design Officers, with input from Transport for London. It is proposed that the retail is served from the basement loading bay accessed from Church Street, and the management company will organise the facilities operationally.
- c. Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas*
- 3.14 The landscaping at the site has been designed to provide a permeable environment at ground level, with active retail frontage at ground floor and natural surveillance from glazed common areas in the residential blocks. Enhancement to the streetscape at Newcastle Place will facilitate circulation, including at peak times, through further enhancements to the public realm set out in the 2022 amended proposed development, including the partial pedestrianisation of the street, and the removal of the podium between block J and K providing further public realm and routes through the site for pedestrians.

d. It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building

3.15 The area has a PTAL of 6a, which is the highest level. The design has been developed with an emphasis on pedestrian and cycling routes, with generous footways and cycle stands for short-stay, in accordance with TfL London Cycling Design Standards. Drop-off bays have been incorporated to facilitate day-to-day servicing of the development.

3.16 The new public realm provides links to Edgware Road, a popular transport hub.

e. Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area.

3.17 The 2022 amended proposed development forms part of the masterplan at West End Gate, which seeks to comprehensively deliver estate renewal and regeneration, delivering more homes, an improved shopping centre and public realm.

3.18 During pre-application consultation, it was noted that the housing mix should respond to the requirements of supporting the Church Street Estate Regeneration project, which is the intention.

f. Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on adjoining buildings

3.19 An important objective of the proposals is to improve the quality of the streetscape and the way the buildings relate to the streetscape at ground level throughout the site, and the mix of appropriate uses that will help to generate this active street frontage.

3.20 The new ground floor frontages will bring the activity to the front of the site and improve the relationship with the area of improved public realm at Newcastle Place including its part pedestrianisation. The orientation of the tallest building on the corner has been considered to step down the massing toward the more sensitive Paddington Green frontage, and to respond to the landmark position of this element of the site, adjacent to the flyover and Edgware Road.

3.21 The positioning of the new blocks within the site has been the subject of particular consideration with the GLA, to optimise the opportunity to provide new public realm and improve the pedestrian experience in a heavily urbanised part of London. To this end, a comprehensive landscaping scheme has been developed which includes a linear landscape garden running east-west across Newcastle Place which is part pedestrianised; green lanes to provide pedestrian access through the site to improve permeability (including the removal of the office podium between block J and K delivering additional public realm and new routes through the site); and an area for play space and soft landscaping positioned furthest from the junction.

3.22 Our assessment has found that the potential townscape effects arising from the redevelopment of this site are beneficial, arising through the introduction of new high quality architecture and public realm, replacing unrelieved hardstanding and the existing police station, which detracts from the existing streetscene, providing a hostile frontage which currently detract from the way the area appears and functions.

3.23 The arrangement of the 2022 amended proposed development has been designed to offer public spaces and pedestrian routes that would respond to the immediate and future context of the Housing Regeneration Area.

3.24 The proposals would improve the permeability and the quality of the public realm offer across the site through improved public realm and landscaping, including at Newcastle Place, making a marked contribution to public amenity space, and encouraging use and activity in a heavily urbanised part of the town centre.