

18 November 2022

Hannah Thomas  
Greater London Authority  
City Hall  
Kamal Churchie Way  
London  
E16 1ZE

Ref: BERL3011

Dear Hannah,

**PADDINGTON GREEN POLICE STATION, 2- 4 HARROW ROAD, LONDON, W2 1XJ**

**REF. GLA0711 - REVISIONS TO APPLICATION FOR FULL PLANNING PERMISSION**

On behalf of Berkeley Homes (Central London) Ltd, we are pleased to submit revisions to the full (EIA) planning application for the redevelopment of Paddington Green Police Station ('the site'), located at 2-4 Harrow Road W2, which has the GLA Stage 3 reference GLA0711 (original WCC Application Ref. 21/02193/FULL). The revised description of development is as follows:

*"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 development will deliver 556 new homes to Westminster (all provided with access to dual stair cores, in line with emerging fire regulations), including 219 on site affordable homes (including social rented and intermediate homes), in addition to active ground floor commercial uses, a significant public realm and landscaping strategy alongside an all-electric, sustainable, energy strategy.

**INTRODUCTION**

The redevelopment and delivery of the Paddington Green Police Station (PGPS) site represents the final phase of Berkeley's wider West End Gate development, phase 1 and 2 of which are currently being delivered. The West End Gate Masterplan is Westminster's single largest housing site, which in total across the three phases will deliver 1,400 new homes to Westminster including nearly 400 affordable homes, alongside a range of complementary employment uses, transformative public realm and place shaping improvements.

[additional information form](#)

T 020 7851 4010 [turley.co.uk](https://www.turley.co.uk)

The delivery of PGPS and the West End Gate Masterplan is therefore of strategic significance to the delivery and implementation of London Plan priorities, and more generally is also essential to facilitate the delivery of the City Council's adjacent Church Street Masterplan and priorities of the Westminster City Plan. 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.

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, combined with Westminster's shortfall of delivery against the minimum strategic affordable housing targets, means that PGPS will have a significant and positive potential impact on the implementation of the London Plan in terms of the provision of new homes and affordable housing.

The PGPS site has been vacated by the Metropolitan Police after serving as the capital's highest security police station since the 1970's, following its allocation and disposal as a surplus site as part of the Mayor's Office for Policing and Crime's (MOPAC) estate strategy. The existing functions have already been relocated across London. As such, the purchase of the site by Berkeley ensures that the now redundant, detracting brownfield site will be brought back into viable use as soon as is possible, through a holistic and optimised place making proposal on a key site for London, Westminster and the Church Street area.

## **BERKELEY IN LONDON**

Berkeley is a nationally recognised house builder and FTSE100 company, who are committed to delivering high quality new homes across London. With 29 sites currently across London, Berkeley currently delivers close to 10% of London's affordable and private homes each year and are set to deliver more than 3,000 affordable homes in the next three years. The majority of homes will be created on complex brownfield regeneration sites, delivered alongside new infrastructure, amenities, jobs and green open spaces.

More specifically, Berkeley has an extensive and established track record of delivery in Westminster and collaboration with the City Council, which in recent years has included the development of West End Gate, 9 Millbank and Ergon House, 190 Strand, Abell & Cleland House and Ebury Square, which have contributed significant housing delivery and wider place making benefits across Westminster. Sites are always built out straight away on obtaining planning permission, demonstrating a track record and commitment of delivery and high quality.

## **APPLICATION SITE**

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 line, plus the Circle, District, Hammersmith & City Lines from a separate entrance), in close proximity to Paddington Railway Station and being serviced by a number of bus routes. The site forms and sits at a key gateway and arrival point to the centre of Westminster and the West End and Central Activities Zone more generally.

The site consists of a single, interconnected building, albeit with a number of different, interrelated built forms. This includes the 17 storey accommodation/section house on the eastern side of the site, a main office and police front of house 3-storey building below this on the eastern side of the site, and an 8 storey annex at the western side of the site, connected by a single storey building that previously housed high security cells. The site also includes a single level of basement and a surface level podium car park to the rear, both accessed from Newcastle Place.

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 December 2020. The remainder of the site previously housed a range of local and London-wide police functions. This included a neighbourhood front of house police service which has since relocated to neighbouring Church Street, section house accommodation serving the whole of London, high security custody suite and cells, and a series of offices accommodating pan-London police functions and services which have been relocated across London.

The existing buildings offer no architectural merit, detracting from the local heritage and townscape settings, and their demolition has been accepted and is fully supported by officers for the site to be comprehensively redeveloped. In the brief period when the site was vacant until Berkeley acquired it in 2020, it created a dead spot with no natural surveillance and little vehicular use, and was subject to well documented squatting and anti-social behaviour, further eroding any value the site brings to the local area, and only emphasising the need to redevelop the site and re-integrate it into the local community.

## **APPLICATION AND AMENDMENT PROCESS**

The originally submitted (April 2021) application was heard at Westminster's Major Planning Applications committee in September 2021 where it was recommended for approval by officers but subsequently refused by committee, the grounds of which are set out in the Planning Statement accompanying this application. Following Westminster's committee resolution, the Mayor of London in his Stage 2 decision dated November 2021 resolved to become the determining authority for the planning application, calling in the application for Stage 3 consideration, as a site and application of strategic importance for the delivery of the London Plan, and for housing delivery in London specifically.

The applicant has subsequently undertaken extensive public consultation and pre-amendment engagement with the Greater London Authority (GLA), the London Review Panel (LRP), Transport for London (TfL), Historic England (HE) and a range of local stakeholders. This engagement throughout the last 12 months has resulted in the evolution and refinement of the proposed development in a number of ways, with a focus on the height, bulk and massing of buildings, the layout of the site and detailed design, public realm provision, climate change and associated energy strategy, as well as around the affordable housing provision and other elements to maximise and enhance the public benefits to be delivered, and to optimise the development of the brownfield site. The key improvements to the scheme are set out below.

## **THE PROPOSALS**

The submitted proposal transforms what is currently a hostile, 'fortress' island site, which reflects the previous high security police function of the site, delivering the redevelopment and optimisation of former public brownfield land in Westminster for a residential development of strategic importance to London and Westminster.

At the heart of the proposal is significant housing delivery, which underpins the proposals. In terms of housing delivery, PGPS will deliver 556 new homes to Westminster, representing over 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 London and Westminster, being the largest private sector led housing site in Westminster by some way.

In terms of affordable housing provision, the proposal will be 'fast track' compliant, with 38% of the homes on site being affordable housing (by habitable room), comprising Social Rented (60% by habitable room)

and Intermediate homes (40% by habitable room), and supporting the future redevelopment of neighbouring Church Street. The proposal will deliver significant housing choice including over 25% of the homes proposed as family sized housing (with a focus on provision of family sized homes in the social rented tenure), and with all homes meeting all required standards of residential quality, and benefitting from access to private amenity space and the extensive public realm and landscaping throughout the site.

The proposal opens up the ground floor and public realm, creating active uses, public spaces and new routes through and around the site for pedestrians and cyclists, connecting the site through to West End Gate and Paddington Green. The ground floor is to be activated around the site by a range of commercial uses including shops and restaurants and a community use, which will enhance natural surveillance and the safety and security of the local area.

Newcastle Place is transformed into a pedestrianised public urban green space connecting Edgware Road and Harrow Road to Paddington Green, with vehicular access constrained to small scale servicing and deliveries directed around the existing carriageway around the northern elevation of the neighbouring Westmark tower (within West End Gate). Significant new tree planting will be delivered around the site, alongside the provision of extensive planting, new lawn areas, play space, public art and water features alongside public seating and dwell spaces. The revisions include the delivery of additional pedestrian routes through the site by the removal of the office podium between block J and K, and a new public garden on the western side fronting Paddington Green as a result of revisions to the footprint and massing of Block I.

There are three principal buildings delivered through the proposals, with their scale responding to the site's surrounding context, and with the proposed revisions driven by the aim of mitigating heritage impacts to designated assets locally, and townscape impacts in longer views as discussed with officers and the LRP over the last 12 months. Accordingly, the height, bulk and massing of the three buildings has evolved through discussions with the GLA, LRP and others through the Stage 3 process as set out in this planning submission, to address key comments around the coalescence of massing in long views, and aspirations to enhance the public realm, enhance residential quality and mitigate the impact on neighbouring residential properties. The architectural approach and treatment is also contextual, and introduces variety across the three buildings, which are of the highest quality, fire safety, sustainable design and architecture, designed by renowned architects Squire and Partners.

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 at 39 storeys (block K) on the corner of Edgware Road and Harrow Road, marking this gateway into the West End and a key area of activity around Paddington.

Since WCC's Planning & City Development Committee's resolution to refuse planning permission in September 2021 extensive engagement has been undertaken with GLA officers to maximise the public benefits of the scheme. The key improvements delivered 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 development's Urban Greening Factor
- Delivery of a new community space fronting onto a publicly accessible garden

The public benefits delivered by the proposal are substantial and wide ranging, and have been enhanced through this amendment submission, reflecting the opportunity to holistically re-imagine the site and its role and contribution to the local area.

Having regard to 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 to the delivery of social rented housing.

The redevelopment represents a significant opportunity to address long standing detracting features of the site, and to deliver a proposal that repairs and softens the streetscape significantly, and integrates the proposed high quality mixed use development into the local environment and community.

## APPLICATION DOCUMENTS

This revision to the full planning application is accompanied by the following updated/replacement documents and reports:

- Covering letter (this document)
- Planning Application Form
- CIL 'Additional Information' Form and cover letter
- 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 (by Murdoch Wickham), prepared by Squire & Partners
- Lighting Strategy, prepared by Squire & Partners
- 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
- 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
- Structural Method Statement, Prepared by Walsh
- BREEAM Pre-assessment, prepared by AESG
- Drainage Strategy Report, prepared by Walsh
- Transport Assessment, prepared by Arup
- Arboricultural Report, Tree Fabrik
- Code of Construction Practice Appendix A, Berkeley Homes
- Statement of Community Involvement, prepared by Concilio
- Ventilation Statement, prepared by Buro Happold
- Site Waste Management Strategy, prepared by ARUP
- Operational Waste Management Strategy, prepared by ARUP
- Biodiversity Net Gain, prepared by Ramboll
- Health Impact Assessment, prepared by Ramboll
- Fire Statement, prepared by AESG
- ES, prepared by Ramboll (details below)

## Environmental Statement

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

- Non-Technical Summary (NTS);
- Volume 1: Main Environmental Statement;
  1. Introduction;
  2. EIA Process and Methodology;
  3. Alternatives and Design Evolution;
  4. Proposed Development Description;
  5. Demolition and Construction Description;
  6. Socio-Economics;
  7. Air Quality;
  8. Noise and Vibration;
  9. Wind Microclimate;
  10. Daylight, Sunlight, Overshadowing and Solar Glare;
  11. Cumulative Effects;
  12. Summary of Residual Effects and Glossary of Terms and Abbreviations
- Volume 2: Townscape, Visual and Built Heritage Assessment (TVBHA);
  - Technical Appendix 1.1: Legislation and Policy
  - Technical Appendix 1.2: AVR Methodology
  - Technical Appendix 1.3: Map of Townscape Receptors
  - Technical Appendix 1.4: Map of Heritage Receptors
  - Technical Appendix 1.5: Zone of Theoretical Influence
  - Technical Appendix 1.6: Map of Viewpoint Locations
  - Technical Appendix 1.7: List Entry Descriptions
- Volume 3: Technical Appendices
  - Technical Appendix 1.1: IEMA Quality Mark Checklist
  - Technical Appendix 1.2: Regulation 18(5)(b) Statement
  - Technical Appendix 2.1: EIA Scoping Opinion Request Report

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

I trust this is sufficient to validate and consider the amended planning application, which has been submitted directly to the GLA, however if you require any clarification or anything further please contact me or Luke Sumnall at our offices.

Yours sincerely



Laurence Brooker  
**Director, Head of Central London Planning**

[laurence.brooker@turley.co.uk](mailto:laurence.brooker@turley.co.uk)