

Paddington
Central

 British
Land

FIVE KINGDOM STREET

SUSTAINABILITY STATEMENT

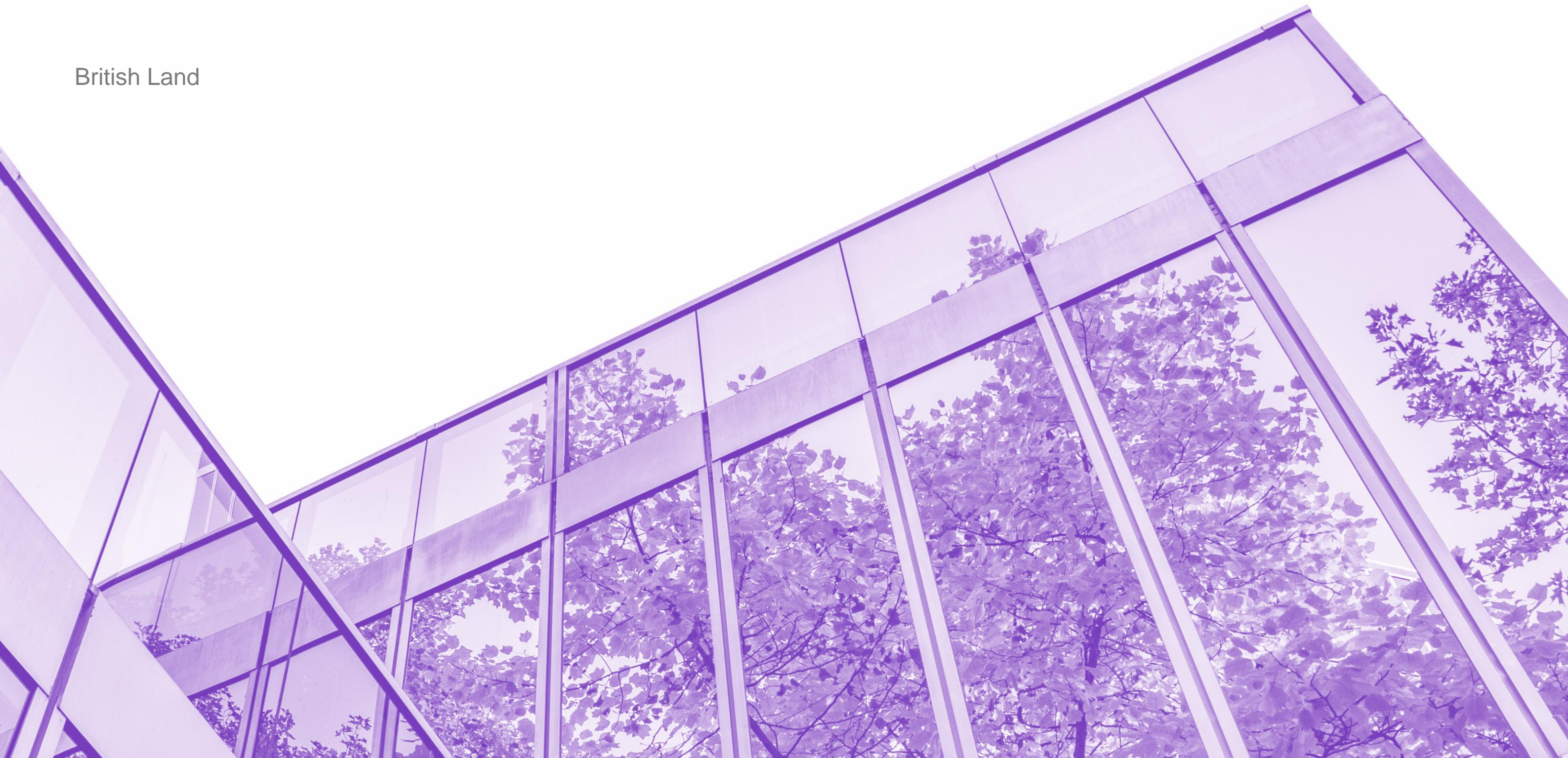
JULY 2020



Sustainability Statement: Addendum (July 2020)

Five Kingdom Street

British Land



Client British Land

Revision Version 03

Date of issue 30th July 2020

Report production Natalia Ford

Natalia Ford

Checked and authorised by Oliver Morris

Oliver Morris



Figure 1-1 Five Kingdom Street

Contents

1.0 Executive Summary	4
2.0 Introduction	6
3.0 The Sustainability Vision for Five Kingdom Street.....	9
4.0 Legislation & Planning Policy Summary	11
5.0 Energy & Carbon.....	12
6.0 Climate Change Adaptation	15
7.0 Land Use & Biodiversity.....	16
8.0 Materials & Waste	21
9.0 Transport	23
10.0 Conclusion.....	26
Appendix A – Planning Policy	27



1.0 Executive Summary

1.1 Changes to Proposed Development

British Land is committed to their corporate vision creating Places People Prefer. Strengthened by their new 2030 vision with intensified focus on two time-critical areas where British Land can create the most benefit:

- 1) net zero carbon developments, and
- 2) growing social value and wellbeing in the communities in which BL operates.

Through the vision, British Land delivers long-term and sustainable returns to all stakeholders and makes a lasting and positive contribution to communities and wider society.

This 2020 Sustainability Addendum is submitted in support of the 2020 Application Amendment and should be read in conjunction with the 2019 Sustainability Statement previously submitted in May 2019. The 2020 Sustainability Addendum reflects the changes to the scheme and represents any impacts to sustainability.

1.2 Legislation and Planning requirements

National, London and local planning requirements have not undergone any material changes that impact on the proposed design. The draft New London Plan has progressed to Intend to Publish status but with no major changes. The Westminster City Plan 2019-2040 is undergoing Examination in Public (EiP) and Westminster City Council (WCC) recommend that priority be given to the current City Plan.

1.3 Energy and Carbon

Changes to the energy demand and strategy for the development has resulted in a regulated carbon emission reduction of 46% over Part L2A Building Regulations 2013 exceeding London Plan and Westminster Planning Policy.

Any changes to the design will result in a change to the quantity of embodied carbon. A review of the massing and material quantities concluded that there has been no fundamental re-design and therefore the impact on embodied and whole life carbon is nominal.

Whole life carbon will be reviewed in Stage 3 with the aim to drive further reductions in order to advance towards net zero carbon.



Figure 1-1 Afternoon view of Five Kingdom Street from The Westway A40 approach

1.4 Climate change adaptation & Land use and biodiversity

The proposals have sought to optimise the area of green infrastructure (GI) in line with new massing and layout and will deliver a revised quantum and layout of GI that continues to strengthen the existing GI network across the scheme. The changes to the design have had a minor impact on the area dedicated to urban

greening which have resulted in a recalculation of the urban greening factor (UGF), raising it from 0.28 to 0.29 (excluding the internal garden), and from 0.3 to 0.32 (including the internal garden).

These minor changes to green infrastructure and the UGF have been reviewed to ascertain any impact on the climate change resilience of the scheme, but are deemed to be nominal changes and a new climate change hazard evaluation is not required.

1.5 Materials and Waste

The general approach to material efficiency for the 2020 GLA planning addendum design remains unchanged. In terms of circularity, there is an improved strategy towards the flexibility of the development through a redesign of the Box to provide 8,000 square metres of flexible and affordable workspace. Whilst the circularity approach and the quantum of specific construction materials have had minor changes, they are not deemed sufficient for a re-assessment of circular economy principles and strategies deployed.

1.6 Transport

There are no changes to the access strategy of the 2019 Planning Application however some further work has been carried out on the servicing of the Novotel Hotel and the pick-up and drop-off area for taxis and private hire vehicles.

Based on the requirements of the draft New London Plan, 730 long stay cycle spaces would be required for the long-stay (i.e. staff) cycle parking, which is an increase of 30 spaces. Whilst the provision of spaces for folding bikes is generally not an acceptable alternative to conventional cycle parking, an exception may be applied in office development within the Central Activities Zone which is close to a rail terminus and is therefore applicable to this development. Based on this, a five per cent reduction has been applied to the cycle parking provision for B1(a) office use. An additional 37 folding bike lockers will be provided and has been agreed with TfL. There will be a total of 226 short stay cycle parking spaces located in the public realm. A cycle hire docking station will be located within British Land's Paddington Central Estate and the applicant is committed to the provision of a docking station combined with an associated financial contribution.

1.7 Conclusion

The 2020 Sustainability Amendment supports the 2020 Planning Application through highlighting the changes and improvements made to the sustainability credentials of the development, continuing to align to all relevant national and local policy requirements. The site complies with Westminster Local Plan, the current London Plan whilst also giving due consideration to the emerging London Plan wherever possible.



2.0 Introduction

2.1 The Applicant

The Applicant is British Land (BL) which has appointed TFT LLP as the sustainability consultants to embed sustainability within the design proposals and monitor performance throughout construction.

2.2 Background

This 2020 Sustainability Addendum is submitted in support of the 2020 Application Amendment and should be read in conjunction with the 2019 Sustainability Statement previously submitted in May 2019.

The 2019 Sustainability Statement outlined the holistic approach the Applicant and project team have taken to deliver a sustainable development. The 2020 Sustainability Addendum reflects the changes to the scheme and represents any impacts to sustainability.

2.3 Purpose of document

Sustainability comprises several cross-cutting themes that are summarised in the original Sustainability Statement. This Addendum highlights the differences in approaches to, and targets for, sustainable development resulting from changes in design strategies of the amended proposed design. It also responds to any updated planning policy requirements by the Mayor and Westminster City Council.

This Sustainability Statement Addendum sets out:

- A description of the existing site and amended proposed development;
- Resultant impacts on the conclusions of the original assessment submitted alongside the 2019 Planning Application;
- Brief overview of any changes in key planning policy (with full details provided at Appendix A); and

- An appraisal of the sustainability performance of the amended proposed development under key environmental, social and governance themes, and alignment with planning policy.

Unless otherwise set out in this Addendum, the approaches and conclusions contained in the 2019 Sustainability Statement and in subsequent correspondence between the Applicant and the GLA or WCC (as appropriate) remain unchanged and valid in relation to the 2020 Application Amendment.

2.4 Proposed Development

British Land will be submitting a full planning application for the construction of new building comprising ground (Kingdom Street) + mezzanine + 18 storeys + plant space, with three levels below Kingdom Street level. The building footprint is generally consistent from Level 01 to 18 with a slightly larger footprint at Ground and Mezzanine levels; however, at the levels below (Lower Ground, 'Upper Box Level' and 'Lower Box Level' (track level)) the development footprint extends eastwards under the 4 Kingdom Street, Hotel Novotel London Paddington (3 Kingdom Street) and 1 Kingdom Street buildings. A public garden, landscaping, cycle parking and other associated works will also form part of the application.

The 2020 Application Amendment has changes to the design summarised as follows:

- One of the two plant floors at the top of the building has been removed and replaced with B1(a) Office, and some of the building plant has been moved into the basement
- The Novotel servicing arrangement has been refined
- Commitment to provide 3,900 sqm of B1 (a) workspace in the Box.

A total of 48,264 sq. meters (GIA) high quality office use floorspace (B1(a)) will be provided from Ground Floor through to Level 18 with additional flexible office (B1(a)) / retail (A1 and A3) floorspace located from Lower Ground Floor, Ground Floor level and on the Mezzanine level.

Office space will also benefit from 1,002 sqm of outdoor office amenity space/terracing, comprising mezzanine, Level 01 and rooftop amenity spaces/ terraces, giving Paddington a unique, commercial office asset, which has wellbeing designed into its core offering.

The scheme includes 265 sqm dedicated to flexible retail use at Lower Ground level, and an additional 723 sqm of flexible retail/office space, comprising uses A1, A3 and B1(a), spread across Lower Ground, Ground and Mezzanine levels.

A publicly accessible internal garden space ('the Garden'), which includes a café/ bar, (sui generis), is proposed through the lower levels between Kingdom Street (Ground Floor Level) and Harrow Road (Lower Ground Floor Level), creating a public pedestrian route. This internal link will enable a new east-west route through the building connecting Paddington Opportunity Area/CAZ to the area in and around Harrow Road (and the rest of the North Westminster Economic Development Area - NWEDA). 'The Garden' will total 1,636 sqm. (GIA) in area.

An auditorium, an affordable work space, floorspace for flexible commercial, cultural and/or leisure uses, and mixed-use ancillary floorspace are proposed on the two lower levels, which are referred to as 'the Box' (Upper Box Level and Lower Box Level). The auditorium comprises a total of 738 sqm and the affordable workspace 3,900 sqm. There is an additional 6,913 sqm dedicated to mixed-use ancillary floorspace.

A total of 3,490 sqm. (GIA) of floorspace is proposed for flexible commercial, cultural and/or leisure uses.

The mix of uses proposed comprises:

- Restaurant (A3);
- Market hall (sui generis);
- Conference / exhibition space (D1);
- Cinema (D2);
- Gym / sports (D2); and

The maximum proportion of the total floorspace that could be provided by each use is as follows:

- Restaurant (A3) / Market hall (sui generis): combined, will make up to a maximum of 100% of total area;
- Conference / exhibition space (D1): will make up up to a maximum of 100% of total area
- Cinema (D2): will make up no more than 50% of total area; and
- Gym / sports (D2): will make up no more than 50% of total area

Operational plant is proposed at rooftop level (Level 18/19) and the upper and lower box levels. A cross section through the development with a summary of proposed uses and floor areas is shown in **Figure 2-1** and **Table 2-1**.

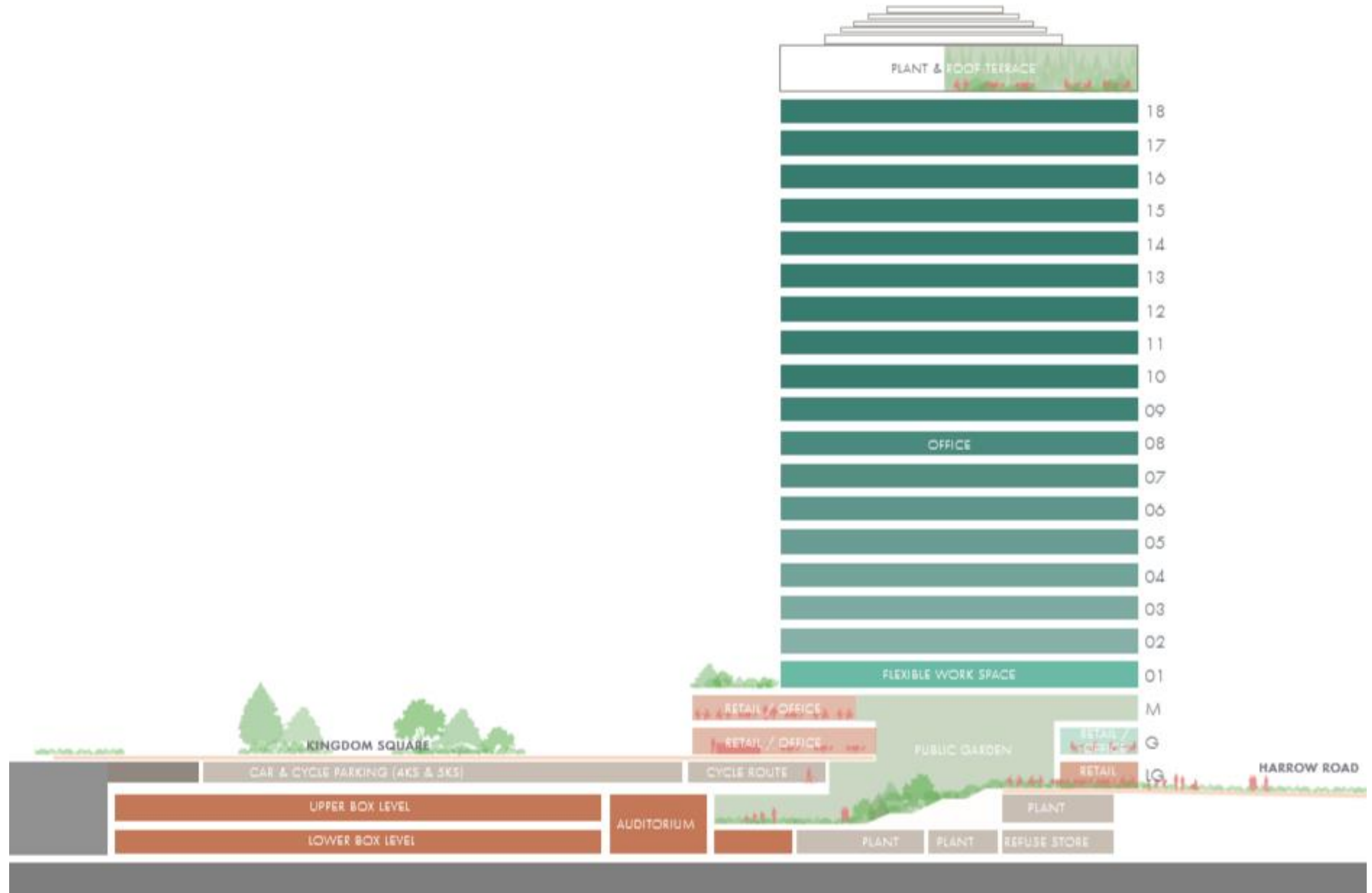
External public realm improvements are proposed both at Ground Floor Level (Kingdom Street) to the east of the building and at Lower Ground Floor Level (Harrow Road) to the west of the building.

For more details on the proposed development please refer to the 2020 Design Access Statement Amendment issued as part of this planning application.

Table 2-1 Breakdown of uses, locations and floorspace for 5 Kingdom Street

USE	LOCATION	TOTAL FLOORSPACE (SQ.M. GIA)
Rooftop outdoor office amenity space	Level 19	795
Outdoor office amenity space/terrace	Level 01	78
Outdoor office amenity space/terrace	Mezzanine	129
Office use (B1(a)) (including internal ancillary space)	Ground Floor Level, Mezzanine & Level 1 – 19	48,264
Flexible retail uses (A1, A3)	Lower Ground Floor Level	265 Maximum floorspace per use: 100% of total floorspace
Flexible retail/office uses (A1, A3, B1(a))	Lower Ground Floor Level, Ground Floor Level & Mezzanine	723 Maximum floorspace per use: 100% of total floorspace
'The Garden' (internal space) inc. café/bar (sui generis)	Upper Box Level, Lower Ground Floor Level, Ground Floor Level	1,635
Flexible commercial/leisure/cultural uses: ▪ Restaurant (A3); ▪ Market hall (sui generis) ▪ Conference / exhibition space (D1/sui generis); ▪ Cinema (D2); and ▪ Gym / sports (D2).	Lower Box and Upper Box Levels	3,490 The maximum proportion of the total floorspace that could be provided by each use is as follows: ▪ Restaurant (A3) / Market hall (sui generis): combined, will make up up to a maximum of 100% of total area; ▪ Conference / exhibition space (D1): will make up up to a maximum of 100% of total area; ▪ Cinema (D2): will make up no more than 50% of total area; and ▪ Gym / sports (D2): will make up no more than 50% of total area.
Affordable Workspace (B1(a))	Lower Box and Upper Box Levels	3,900
Auditorium (sui generis):	Lower Box and Upper Box Levels	738
Mixed use ancillary	Lower Box, Upper Box Levels and Lower Ground Floor Level	6,913

Figure 2-1 Cross through section of the proposed development at Five Kingdom Street





3.0 The Sustainability Vision for Five Kingdom Street

3.1 British Land's 2020 Sustainability Strategy

British Land's approach to sustainability continues to be market leading in real estate development. In early 2020, BL reviewed and updated its strategy for developments and commitments as a company, pushing the envelope in terms of what is business as usual for a large scale property developer.

Through BL's new strategy, efforts and commitments are being intensified on two time-critical areas of focus.

1. making the whole BL portfolio net zero carbon; and
2. partnering to grow social value and wellbeing in the communities where BL operates.

While concentrating on these areas, BL will maintain strong performance and commitment on social and environmental priorities, in line with the BL's purpose and values and its overriding mission: creating Places People Prefer.

For more information on the new BL strategy refer to: <https://www.britishland.com/sustainability/strategy>

In addition to the ambitions and targets in the new 2020 strategy, BL continues to maintain excellent sustainability policies implemented across its developments, which include but are not limited to:

- Corporate Sustainability Policy;
- Environmental Management System
- Local Charter;
- Supplier Code of Conduct;
- Position on Climate Change;
- Sustainability Brief for Developments;
- Materials Schedule;
- Whole Life Carbon requirements;



Figure 2-2 British Land's 2030 Sustainability Vision

- Wellbeing principles

For full details of BL's policies please refer to:

<https://www.britishland.com/sustainability/governance/policies>

3.2 Changes in approach to sustainability at Five Kingdom Street

BL has maintained the sustainability ambitions and outcomes for Five Kingdom Street outlined in the 2019 Planning Application. The BL Sustainability Brief for Developments (hereafter referred to as the BL Sustainability Brief) remains one of the principle documents for sustainability process and guidance in order to deliver specific development project sustainability goals.

The brief for Five Kingdom Street embeds sustainable design as a driving principle. The proposed scheme has been developed on best practice principles and aspires to achieve a BREEAM Excellent rating as a minimum.



4.0 Legislation & Planning Policy Summary

This section summarises updated and emerging legislative and planning policy requirements since the 2019 Sustainability Statement.

4.1 Legislation

The statutory regulations relating to sustainable development and carbon efficiency that have been considered as part of the development proposals for the site remain unchanged.

4.2 Mayor's Draft London Plan

The draft New London Plan¹ was published for consultation on 1st December 2017 outlining the ambitions of the new Mayor of London with a priority to provide affordable homes whilst protecting the Greenbelt and investing in Green Infrastructure. On 13 August 2018 the Mayor published a version of the draft Plan that includes minor suggested changes². These suggested changes have been prepared following a review of consultation responses, and consist of clarifications, corrections and factual updates to the draft Plan that informed the Examination in Public (EiP). The EiP was carried out from January – May 2019 and an Intend to Publish version of the draft London Plan was published in December 2019³.

The consolidated version of the draft New London Plan includes changes to the following policies:

- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy infrastructure

- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy G1 Green infrastructure
- Policy G6 Biodiversity and access to nature Policy
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T7 Deliveries, servicing and construction

The project team has considered the 2020 Proposed Development in the context of the latest draft New London Plan with the consolidated changes and meets all requirements.

4.3 Westminster's Local Development Framework

WCC currently has a Local Development Framework (LDF) detailed in the 2019 Sustainability Statement which remains unchanged.

WCC issued a full draft City Plan 2019-2040⁴ in July 2019 as part of the statutory Regulation 19 consultation. The draft City Plan 2019-2040 highlights the three key themes; Homes and Communities; A Healthier and Greener City; and, Opportunities for Growth and details a roadmap to achieving these ambitions. This will eventually replace all saved policies within the UDP and the existing City Plan. However, until the Examination in Public (EiP) process has concluded, WCC recommend that priority be given to the current City Plan.

¹ The Draft New London Plan (Dec 2017)

https://www.london.gov.uk/sites/default/files/new_london_plan_december_2017_web_version.pdf

² The Draft New London Plan Showing Minor Suggested Changes (August 2018)

https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf

³ Draft New London Plan - Intend to Publish version, December 2019

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-london-plan-consolidated-suggested-changes-version-july-2019>

⁴ City of Westminster City Plan 2019-2040: https://www.westminster.gov.uk/sites/default/files/city_plan_online.pdf



5.0 Energy & Carbon

5.1 Background

The legal, regulatory, policy based and international agreement context which require increased accounting and limiting of greenhouse gases (GHGs) from development remains unchanged since the 2019 Planning Application. The Climate Change Act 2008⁵, the GLA emissions targets for all major developments and the 2015 Paris Accord⁶ remain in force. In addition, the Climate Change Act 2008 was amended in 2019 to include a net zero emissions target for 2050⁷ and changed the minimum percentage by which the net UK carbon account for the year 2050 must be lower than the 1990 baseline, from 80% to 100%.

BL's Sustainability Brief details the requirements of their project teams, which includes prioritising energy and carbon performance of built assets across the whole life cycle, including embodied carbon of construction materials as well as assessing unregulated energy use.

5.2 Energy Demand Assessment

An Energy Strategy has been developed for the proposed development in accordance with the energy hierarchy principles outlined by the GLA to minimise regulated energy demands on site. The hierarchy is stated as:

1. Lean – Use less energy
2. Clean – Energy efficient supply
3. Green – Renewable energy
4. Seen – Monitor, verify and report on energy performance.

The Energy Strategy produced by Ramboll follows the GLA guidance on preparing energy assessments⁸ and has been designed to meet the requirements of the draft New London Plan (2018) and Westminster City Council. In addition to this, changes from the 2019 Planning Application includes a revised approach for the development to achieve net zero carbon status through removal of gas boilers as well as including an offset payment.

For more details of the energy efficiency measures proposed for Five Kingdom Street please refer to Ramboll's revised Energy Assessment submitted as part of the 2020 Planning Application.

5.3 Lean – Use less energy

A combination of best practice passive design measures and energy efficiency measures have been incorporated so that compliance with Part L of the Building Regulations will be achieved without reliance on the contribution of renewables and low carbon technologies. Measures include high-efficiency HVAC systems (including cooling and ventilation systems), careful design of the façade and detailed analysis of the glazing ratio and performance. The systems' design also complements the energy use profiles between the end uses by recovering waste heat from the office heat rejection circuit to meet domestic hot water demands. Energy efficient light fittings, controls and a comprehensive metering strategy also contributes to energy demand reduction. Through the energy saving measures, the overall development is anticipated to save 19% on CO₂ emissions over the baseline case and meets the requirements of existing London policy.

5.4 Clean - Energy Efficient Supply

The amended design includes low carbon measures and has explored the option to connect to an area wide heat network as well as a review of the carbon performance of on-site communal heating systems against the Building Regulations 2013 Part L requirement. There are no existing district heating networks, or any being developed in the area surrounding 5 Kingdom Street therefore heating will be provided by highly

⁵ Climate Change Act (2008), <https://www.legislation.gov.uk/ukpga/2008/27/contents>

⁶ European Commission Climate Action, Paris Agreement. https://ec.europa.eu/clima/policies/international/negotiations/paris_en

⁷ Climate Change Act 2008 (2050 Target Amendment) Order 2019, HM Government,

<http://www.legislation.gov.uk/ukdsi/2019/9780111187654>

⁸ Greater London Authority – Preparing energy statements: <https://www.london.gov.uk/file/22340/download?token=En8I3jJy>

efficient heat pumps that operate with low carbon emissions compared to traditional district heating networks. The scheme has been designed to allow for a future district heat network connection. A combined heat and power (CHP) system was also not proposed for the development due to the fact they do not deliver the lowest carbon solution when taking into account electric grid decarbonisation, as well as having a negative impact on local air quality.

5.5 Green - Renewable Energy

A wide range of renewable energy technologies were assessed for suitability of this development. Air source heat pumps are selected to deliver 100% of the annual heating demand working alongside hybrid dry coolers and jockey chillers to provide coolth. Consideration has been given to the controls system which is designed to operate the systems to achieve optimal operational efficiency, sequencing plant operation accordingly. Wind turbines, solar photovoltaics, solar thermal hot water and ground source heat pumps were also considered but deemed unsuitable for the development.

5.6 Seen – Monitoring Role

In line with the 'be seen' element of the new Draft London Plan Sustainable Infrastructure (SI) policy 2, BL makes a commitment to monitor and report on the energy performance of the development for at least five years post construction.

At planning stage, once planning approval has been granted, and within four weeks, BL will provide accurate and verified estimates of each of the performance indicators relevant to the planning stage, using the "Be Seen" reporting spreadsheet.

Once the as-built design has been completed and prior to the building being handed over, BL will provide an accurate and verified update of the estimated performance indicators submitted at planning stage.

During the in-use stage, BL will monitor and report accurate and verified annual energy performance data for the Energy Centre via the 'be seen' spreadsheet for at least five years once the defects liability period (DLP) is complete. Monitoring of the heat pump system to ensure its operational performance is in line with the targets approved during planning has been established as a requirement for the proposed development by the GLA.

5.7 Regulated Carbon Emissions

In accordance with the London Plan Policy 5.2, developments should make the fullest contribution to minimising carbon dioxide emissions and should meet the 35% reduction targets on site unless clearly demonstrated that this cannot be met. Where 35% targets are not achievable on site, a cash in lieu contribution is required to the local authority to secure the delivery of carbon dioxide savings elsewhere.

The Mayor's Environment Strategy⁹ and the draft New London Plan also place an increasing emphasis on new non-domestic buildings to reduce regulated carbon emissions to deliver zero carbon developments. Five Kingdom Street acknowledges the New London Plan is expected to extend the zero-carbon standard to non-domestic buildings once adopted in full. Energy savings will be reviewed during detailed design stage with the aim to improve upon the currently modeled savings and close the gap to achieving net zero carbon if possible. An offset contribution to any shortfall to net zero carbon is also proposed,

The office element of the scheme achieves a regulated carbon emission reduction of 46% over Part L2A Building Regulations 2013 exceeding London Plan and Westminster Planning Policy. The total scheme, including the Box achieves a regulated carbon emissions reduction of 43%.

⁹ Mayor's Environment Strategy (2018), https://www.london.gov.uk/sites/default/files/les_executive_summary_0.pdf

5.8 Embodied and Operational Emissions

Embodied Carbon Emissions

The proposed design has undergone some design changes since the 2019 Planning Application. The design changes have been reviewed to understand if the magnitude of design change has impacted on the embodied and whole life carbon assessment results. The review concluded that whilst the carbon figures would change, this amount would be nominal given that the structures remain mostly unchanged and there has been no fundamental redesign of any part of the building.



6.0 Climate Change Adaptation

6.1 Climate Change resilience

Climate change adaptation and resilience remain a key design feature of Five Kingdom Street and the development contributes positively to actively manage the issues of overheating, resilient foundations, urban greening and flooding risk in the face of extreme weather events.

The changes within the 2020 Amended Proposed Development to the design have had a minor impact on the area dedicated to urban greening. As such, a recalculation of the urban greening factor (UGF) is required, however as the resulting change in the UGF is minor it does not have a consequent impact on the climate change hazard evaluation undertaken for the development and the assessed risk factors and proposed mitigation measures remain the same.

6.2 Urban Greening

The urban greening of the development has undergone minor changes as a result of the proposed design changes as part of the 2020 Amended Application.

The range of green infrastructure measures included in the 2020 Amended Proposed Development has expanded to comprise additional areas of soft landscaping – refer to section 6.4 for details.

The increase in the calculated UGF for Five Kingdom Street means that there is no change in compliance with existing and emerging London Plan policy requirements, specifically Policy G1 Green infrastructure, G4 Open space, G5 Urban greening, G6 Biodiversity and access to nature, and GG3 Creating a healthy city.



7.0 Land Use & Biodiversity

The approach to land use and building design has been to support ecology and deliver a significant net biodiversity gain in comparison to the existing site, borne out through an innovative approach to an expansion of green public realm area, a focus on occupants interaction with green spaces and a mindful approach to planting schemes and the impact on biodiversity.

7.1 Land Use

The 2020 Amended Proposed Development has undergone minor changes to the scale and massing whilst continuing to carefully consider the effect on daylighting, views and existing noise sources.

The proposed scheme seeks to improve connectivity between the neighbourhoods to the north of the site with Paddington Central and the transport hub at Paddington Station by providing a new east – west public route through the site, linking to the existing pedestrian route and landscaping in Kingdom Street to ensure it is intuitive and obvious for pedestrian legibility and wayfinding.

7.2 Site Layout and Building Design

The amended design continues to make optimal use of land and available space by delivering a high-density scheme in an appropriate location. It comprises and co-locates a mix of uses in order to provide the local community with a wider range of services and amenities.

A number of technical assessments have been undertaken to assess the environmental impact of the proposed scheme on the existing site and surrounding areas and introduce mitigation measures or design amendments where required. These are detailed in the Environmental Impact Assessment and the Environmental Statement Addendum that has been submitted as part of the 2019 Planning Application.

7.3 Public Routes and Spaces

Overall, the scheme will contribute over 1,500 sqm of publicly accessible space. The layout, materiality and environmental condition of the public route has evolved throughout the design process. The proposed scheme has settled on a solution that offers the best of both worlds - as open as possible when environmental conditions allow for visitors and occupants to experience good weather, with the ability to be enclosed, conditioned, and accessible during colder, wetter weather. The route will be continuation of Kingdom Street out to Harrow Road through the lower levels of the building with the lobby, the mezzanine terrace and the retail units providing passive surveillance and contributing to feelings of safety for pedestrians. Generous extents of glazing at the lower entrance levels offer views into the public garden from the public realm, and through to the other entrance from either approach. An extension of the external paving leads into the public garden, conceived as a series of cascading surfaces from Kingdom Street to the lower box level. The garden has been conceived as a series of 'inhabitable' platforms. It is envisaged that the broad terrace could host small events or performances within the space, whilst smaller platforms could provide calmer seating areas.

CASCADING GARDEN



GILLESPIES

1

5 KINGDOM STREET / DETCHBOOK 16

Figure 7-1 Illustration of the cascading internal Garden

7.4 Green Infrastructure

The 2020 GLA planning addendum design for Five Kingdom Street maintains the range of green infrastructure (GI) features in order to create a scheme with exemplary public realm. The quantum of open space remains high and the amount of GI is maximised, including a visually beautiful pedestrian link between North Westminster and Paddington Station, increasing exposure of local occupants to the positive effects of biophilia and making a contribution to local sense of wellbeing.

The proposals have sought to optimise the area of GI in line with new massing and layout and will deliver a revised quantum and layout of GI that continues to strengthen the existing GI network across the Campus. Changes to the GI features include:

- Additional greening on the two upper internal mezzanines;
- A decrease in planting at B3 level against the building which is recovered through additional climber planting features;

- A decrease in planting at roof level which is recovered through additional climber planting features;
- Additional planting along Kingdom Street, northwards of the site; and
- An increase in biodiverse extensive green roof above the plant space to the eastern building overhang.

The amendments to the landscaping design give an overall positive increase to the quantity and quality of green infrastructure of 5 Kingdom Street, which will benefit occupants and the general public.

INTERNAL GARDENS



GILLESPIES

1

5 KINGDOM STREET / DETCHBOOK 13

Figure 7-2 Bird's eye view of the internal garden showing publicly accessible soft landscaped areas

2.1 Biodiversity

The landscape provision within the development will be characterised by a distinctive planting design language, and a substantial soft landscape planting programme within the scheme. The planting palette has been developed in consideration of appropriateness to place; aspect and direct sunlight availability; longevity; and biodiversity value.

A key aim across the site has been to create a landscape with a series of closed loop systems - wildflowers attracting bees which pollinate flowers, nitrogen fixing species to add to soil nutrients, and selection of habitat and food species for wildlife benefit. The proposed planting will prioritise native and wildlife friendly species. The planting palette will be highly diverse, and species are required that are best suited to the conditions of this demanding environment. Therefore, selections will be made from a wide-ranging horticultural palette that includes many native and garden varieties, to provide a diversity of species through each of the layers of planting which will provide a resilient landscape over the long term. To complement vegetation, habitat for invertebrates, birds and bats will be incorporated into the landscape and structures at the lower level floors.

2.2 Garden

The publicly accessible garden provides a host of recreational opportunities and reflects the character and uniqueness of its location. The lush gardenesque character of this interior space will be a direct counterpoint to the harshness of the surrounding infrastructure, the space as a public amenity for the community as well as those inhabiting the building will be unique in its character and identity, unparalleled as a truly accessible internal garden in the context of London and the local area.

The public garden is designed as a series of cascading landscaped platforms dropping from Kingdom Street to the lower box level. Planted areas intensify towards the base of the garden and extend out beyond the glazing line to give a sense of nature reclaiming the space. Vertical elements of planting are proposed to accentuate the volume of the space and create a green outlook at multiple levels. The rooftops of both pavilions host landscaped roof terraces, extending the palette of public realm planting vertically to the mezzanine and first floor levels.



Figure 7-3 Proposals showing the pedestrian route through Five Kingdom Street from the Harrow Road entrance



Figure 7-4 Illustration of the internal Garden

7.5 Urban Greening Factor

The Urban Greening Factor (UGF) metric introduced in the emerging New London Plan assists in determining the appropriate provision of urban greening for new developments. The measures that are considered urban greening are unchanged in the emerging policy requirements.

Urban greening features within the development comprise:

- An internal Public Garden at the heart of the development will form the central greening feature of the development;
- Flower rich perennial planting at ground level externally along the Eastern Approach and the West link;
- Soft landscaping at the Eastern Entrance from Kingdom Street which interfaces with and extends into the soft landscaping throughout the public realm areas which are likely to be intensively used with high pedestrian volumes;
- To the west, planted margins along the edges of the pedestrian access are used as vertical and horizontal separation between the pedestrian entrance and the cycle access route;
- Further intensive and extensive green roofs and terraces are proposed at roof level. Some of the roof terraces are accessible to users of the building and raised planting areas are proposed to integrate with seating elements and open event / amenity space;
- Planting is proposed along an external route on the southern edge of the site. As a critical service access route with width requirements, these two constraints limit the extent of planting; and
- The assessed UGF score is 0.29 for all levels which increases to 0.32 when the internal Public Garden is included.

Changes to the urban greening comprise removing the permeable paving on the Mezzanine level, Level 1 and Level 20 terraces, and adding additional climbers on the Level 19 terrace thereby contributing to vertical greening and an improved visual impact. The urban greening factor has changed from 0.28 to 0.29 (excluding the internal garden), and from 0.3 to 0.32 (including the internal garden)

Five Kingdom Street makes a significant consideration to current London Plan policies 2.18, 5.2, 5.3,5.4, 5.10,7.21,7.5, New London Plan Policies:

- Policy G1 Green infrastructure;
- Policy G4 Open space;
- Policy G5 Urban greening;

- Policy G6 Biodiversity and access to nature;
- Policy GG2 Making the best use of land;
- Policy SI16 Waterways – use and enjoyment; and
- GG3 Creating a healthy city.

The scheme's approach and consideration to urban greening, biodiversity and land use continues to align with the efforts of the Mayor and principles included within Chapter 5 Green Infrastructure of the Environment Strategy.

EAST-WEST LINK



GILLESPIES

5 WINCHESTER STREET 25 07701 BOOK 16

Figure 7-5 Illustration of urban greening in the Garden



8.0 Materials & Waste

8.1 Materials, Efficiency and Circularity

The general approach to material efficiency for the 2020 GLA planning addendum design remains unchanged. The expected design life cycle of the scheme continues to be a long term asset in the heart of a commercial area and therefore longevity of materials is still a priority with embedded flexibility of space in order to cater to changing demands of the market.

In terms of circularity, there is an improved strategy towards the flexibility of the development. Flexibility of space and its use is a key circularity strategy within the Mayor's Circular Economy Statement Guidance¹⁰. The new design has reviewed the flexibility of the space, particularly within the Box which offers the opportunity to provide around 8,000sqm of flexible floor space to a mix of uses. The physical space of the Box is very flexible. The Upper Box Level is a new floor which will host a number of large openings to facilitate access and a sense of connectivity between the floors. The Box will be able to accommodate activities that require access to natural light, given the design of lightwells, as well as a range of spaces

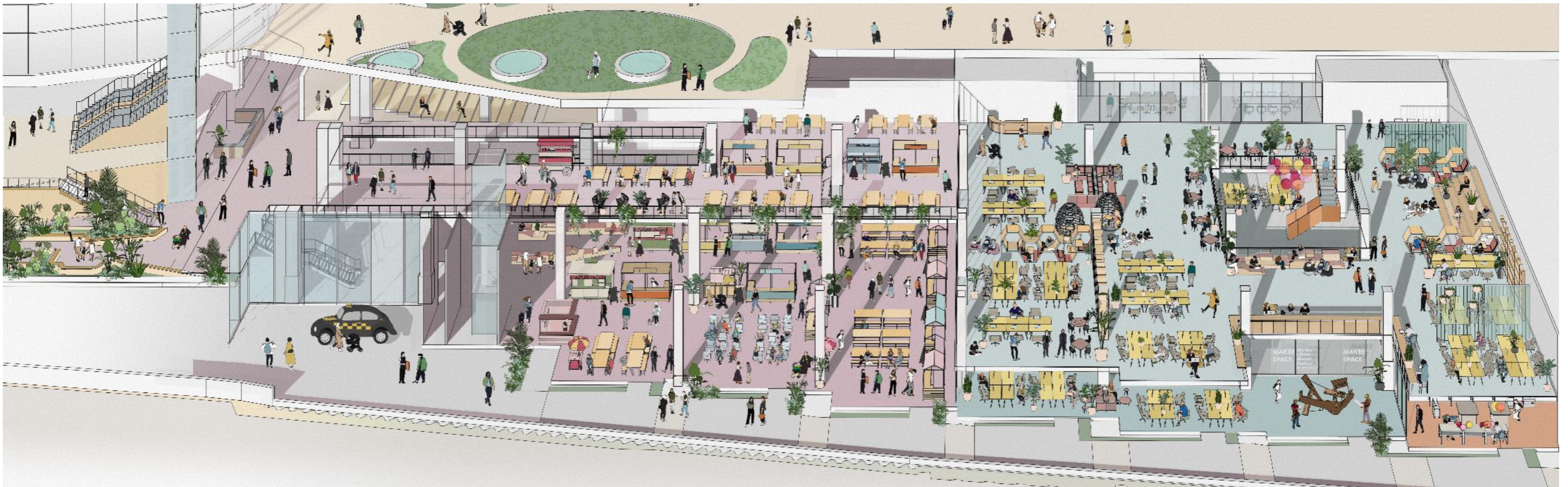


Figure 8-1 Illustrative view of workspace at east end of the box with other uses at the west end

¹⁰ Circular Economy Statement – Guidance (pre-consultation draft), Greater London Authority, March 2020. https://www.london.gov.uk/sites/default/files/ggbd_circular_economy_statement_guidance_2020_web.pdf

that could make best use of the darker / deep plan spaces that the Box has to offer. The open nature of the space lends itself to increased flexibility of use which is a key circular space strategy.

The increased amount of affordable workspace dedicates much needed space for collaborative working and allowing increased businesses to access prime office space.

Commensurate to the approach to material efficiency, the environmental impacts of the proposal are also unchanged with the exception of minor changes to the quantum of specific construction materials, but not in amounts that necessitate a review of circular economy principles and strategies deployed.



Figure 8-2 Illustrative use of the flexible space in the Box



9.0 Transport

9.1 Accessibility and Public Transport

The application site is located within a highly accessible area of central London benefitting from a wide variety of public transport services. No changes have been reported in terms of the public transport offering around the site, as such the Public Transport Level (PTAL) remains unchanged at the high level of 6a.

There are no changes to the access strategy of the 2019 Planning Application however some further work has been carried out on the servicing of the Novotel Hotel and the pick-up and drop-off area for taxis and private hire vehicles.

9.2 Servicing

The existing service road currently located at Harrow Road, will be removed and replaced with an alternative service road at Track Level (Lower Box Level) and a new goods lift to support the Novotel's servicing plan by connecting Track Level to the Ground Floor. Deliveries will use the service road and the space dedicated to three drop-off bays which are also used for taxi pick-up points. Coordination of deliveries to the Novotel will be managed to avoid overlap between deliveries and taxi pick-ups-drop-offs.

9.3 Walkability

The majority of trips generated to and from the proposed development are envisaged to be via public transport, accounting for 86 per cent of total transport to and from site. The remainder comprises nine per cent which will be made on foot and four per cent via cycling. In terms of pedestrians navigating around and through the Five Kingdom Street, the site comprises a complex mix of existing and proposed levels, whilst also fitting in with the existing site, the surrounding sites, plus pedestrian and road infrastructure. As such, important provisions to ensure the comfort of all pedestrians using the public realm are to include:

- Clear visual links between the entrances to the site and key building entrances;
- A legible layout for visitors;

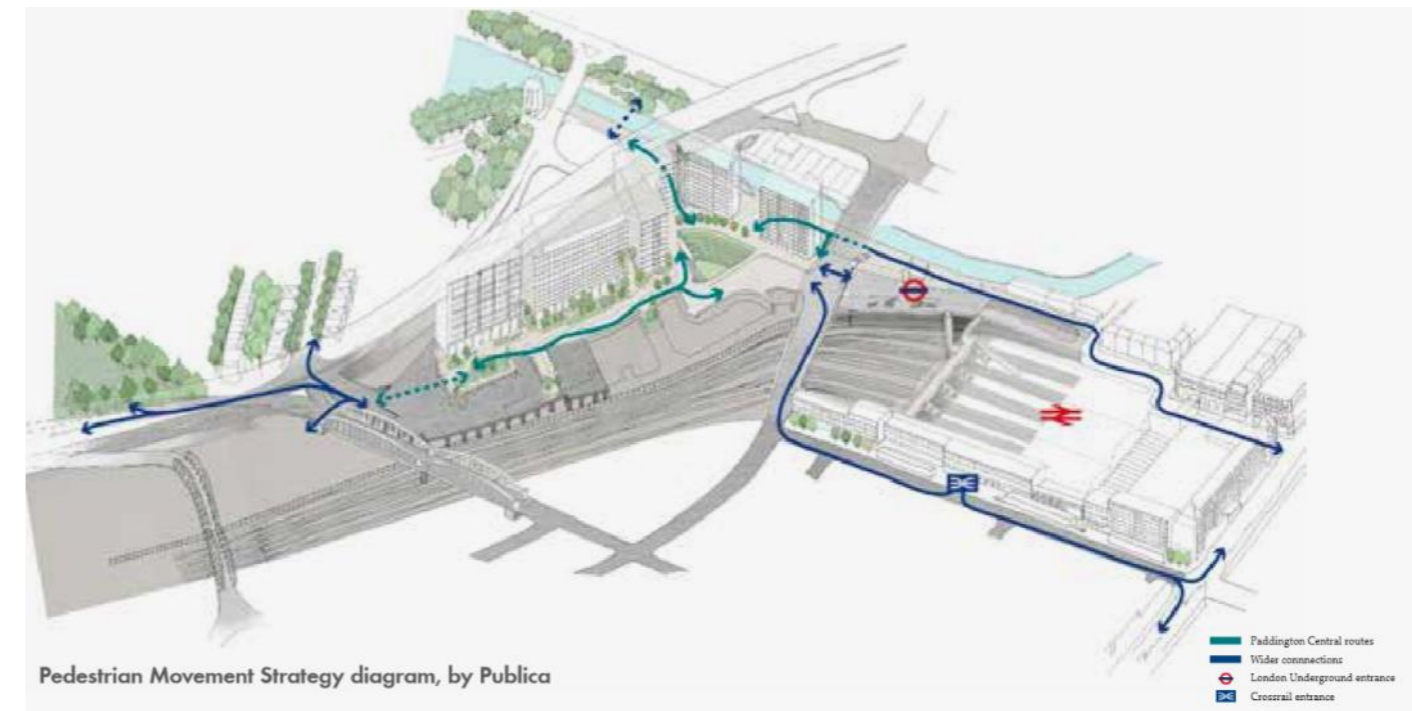


Figure 9-1 Pedestrian Movement through 5 Kingdom Street

- A safe pedestrian zone, without traffic and with step-free, level or gently-sloping circulation routes at the Kingdom Street (eastern) approach at Podium Level;
- Planting and landscape features including seats and resting places every 50m;
- Any street furniture, paving and landscape features such as the proposed trees and public seating placed alongside circulation routes will not create barriers or hazards for people with impaired vision;
- Predictable spaces, facilitating wayfinding for people who are blind or partially sighted;
- Suitable non-slip, even, level walking surfaces. Cobbled surfaces are generally too uneven to provide good access;
- Best practice principles of inclusive design have informed the scheme to provide access for all and 'dementia-friendly' proposals; and

- Suitable tonal contrast between any structure that might protrude into the public area (such as columns) and the background against which it is seen. Pedestrian access routes (PARs) are defined as the most direct and convenient pedestrian routes linking key parts of a Development. They are designed to be inclusive and have access features such as gentle gradients, suitable surfaces, rest points and good lighting. All routes will be designed to meet or exceed the regulations of Approved Document M (AD M) Volume 2 2015 and other relevant guidance.

9.4 Cycling

The cycle route into the building remains unchanged, providing connectivity to the east and west for cyclists arriving to the building as well as a safe off-road link from Harrow Road to Paddington Station. The cycle route from Harrow Road splits from the pedestrian route on the West Link to run around the north of the building, providing access to short and long stay cycle parking facilities for all uses. The cycle route runs along the eastern edge of the garden, links through to an existing estate road that continues south of the Novotel and ramps up to the shared surface of Kingdom Street. Dedicated cycle access is provided into the building from both directions whilst keeping pedestrians and cyclists separated in the public realm.

Cycle parking at lower ground level provides a range of parking options for office workers and visitors to accommodate different types of cycles. A small number of showers are provided on this floor, with access to further cycle parking and shower/change facilities at the Upper Box level, other box uses, and the office entrance via both lifts and stairs to the north of the core. Additional cycling facilities are located at upper box level wrapping around the north of the core. They are accessed directly from the lower ground level cycle route via the cycle lift provided to the north, as well as a dedicated cycle stair with wheel channels. The main provision of shower and locker facilities is located in close proximity to the cycle parking areas under the public garden and within the main office core.

Whilst the level of cycle trips is estimated to be fairly low, a significant level of cycle parking is proposed for both long stay and short stay, in line with TfL standards, to reflect the growth of cycling in London. The increase in floor space and the changes in fixed and proposed uses has necessitated a recalculation of cycle parking provision.

Based on the standards set out in the draft New London Plan, 730 spaces would be required for the long-stay (i.e. staff) cycle parking, which is an increase of 30 spaces. These spaces are provided within the Lower Ground Floor Level. Access to the spaces on the Lower Ground Level would be available directly from the new West Link, as well as Kingdom Street. In addition, and in compliance with emerging London Plan policy,

accessible facilities for disabled cyclists should also be provided with 5% of spaces equipped with Sheffield stands at a wider spacing in order to be suitable for larger/adapted bikes.

The draft New London Plan states that whilst the provision of spaces for folding bikes is generally not an acceptable alternative to conventional cycle parking, an exception may be applied in office development within the Central Activities Zone which is close to a rail terminus and is therefore applicable to this development. Based on this, and the Site's proximity to Paddington Station, a 5% reduction has been applied to the cycle parking provision for B1(a) office use. An additional 37 folding bike lockers will be provided and has been agreed with TfL.

There will be a total of 226 short stay cycle parking spaces located in the public realm. The approach to accessible cycle parking will be step-free along wide corridors and will involve passing through no more than two sets of wide automated doors. Doors to cycle stores will be power operated and have at least 1m clear opening width (for a single leaf). (Refer to Appendix C of the 2020 Transport Addendum for a full breakdown of cycle parking provision).

Changing rooms have been provided and equipped with lockers and showers at mezzanine level to the north of the building core, accessible directly from the cycle parking areas at Lower Ground level by both lifts and stairs. A total of 511 lockers and 77 showers have been provided. In addition, one cycle lift serving the Lower Box Level and Podium Level has been included.

In addition to private cycle provision, the Stage 2 GLA response (dated 23rd March 2020) outlined that provision of an additional cycle hire station within the public realm was required, on the basis of the original request from the GLA (a financial request to extend the existing cycle hire docking station on Orsett Terrace was not feasible due to site constraints and would remove on road parking space for residents). As a result, a docking station will be located within British Land's Paddington Central Estate and the applicant is committed to the provision of a docking station combined with an associated financial contribution.

The long and short stay cycle parking spaces, and all cycle facilities are designed to London Cycling Design Guide principles and compliance with London Plan policy 6.9, 6.10, draft New London Plan Policy T5 Cycling.

For more details on accessibility refer to the 2020 Access Statement prepared by David Bonnett Associates, or refer to the 2020 Transport Addendum undertaken by Sweco which has been submitted as part of this application.



Figure 9-2 Entrance from the Harrow Road to Five Kingdom Street, showing the dedicated cycle path

9.5 Parking

There are no changes to the car parking strategy and Five Kingdom Street remains a 'zero-parking' development. In order to facilitate access for all, an accessible parking space is being provided for the main office levels, with another proposed for uses in the Box. These are located at Lower Ground level, within the existing parking area for Four Kingdom Street. A dedicated crossing is proposed across the cycle route to provide safe access to the public lifts that access the office entrance level, as well as all of the levels in the Box.



10.0 Conclusion

The 2020 Sustainability Amendment supports the 2020 Planning Application through highlighting the changes and improvements made to the sustainability credentials of the development, continuing to align to all relevant national and local policy requirements.

The site complies with the current London Plan whilst giving due consideration to the emerging London Plan wherever possible. As there are no material changes to the Westminster Local Plan, the development also complies with current Westminster policy.

5 Kingdom Street will be a dynamic and vibrant destination for Paddington. The unique design proposals for green space within the public realm, both inside the building footprint as well as its environs, combined with carefully considered accessibility for an expected increase in pedestrians and cycle journeys, as well as a singular offering in terms of diverse space uses and an exceptional affordable workspace located in the Box will create a sustainable landmark in Central London.



Figure 10-1 Dusk view of Five Kingdom Street from The Westway A40 approach

Appendix A – Planning Policy

This section details the key legislative, and the current and emerging planning policy requirements of the Mayor of London and the City of Westminster. It provides the legislation and regulatory planning context against which the 2020 Sustainability Addendum appraises the proposals.

London Plan Policy

The appraisal of the environmental performance and sustainable design of the proposed development is based on a review against both relevant London Plan policies, with cross reference made to relevant local planning policy.

- Policy 1.1 – Delivering the strategic vision and objectives for London
- Policy 2.9 – Inner London
- Policy 2.10 – Central activities zone: strategic priorities
- Policy 2.11 – Central activities zone: strategic functions
- Policy 2.12 – Central activities zone: predominantly local
- Policy 2.13 – Opportunity area and intensification areas
- Policy 2.18 – Green infrastructure: the multi-functional network of green and open spaces
- Policy 3.1 – Ensuring equal life chances for all
- Policy 3.2 – Improving health and addressing health inequalities
- Policy 4.1- Developing London’s economy
- Policy 4.2 – Offices
- Policy 4.3 – Mixed use development and offices
- Policy 4.11 – Encouraging a connected economy
- Policy 4.12 – Improving opportunities for all
- Policy 5.1 – Climate change mitigation
- Policy 5.2 – Minimising carbon dioxide emissions
- Policy 5.3 – Sustainable design and construction
- Policy 5.4 – Retrofitting
- Policy 5.4a – Electricity and gas supply
- Policy 5.5 – Decentralised energy networks
- Policy 5.6 – Decentralised energy in development proposals
- Policy 5.7 – Renewable energy
- Policy 5.8 – Innovative energy technologies
- Policy 5.9 – Overheating and cooling
- Policy 5.11 – Green roofs and development site environs
- Policy 5.12 – Flood risk management
- Policy 5.13 – Sustainable drainage
- Policy 5.14 – Water quality and wastewater infrastructure
- Policy 5.15 – Water use and supplies
- Policy 5.16 – Waste net self-sufficiency
- Policy 5.17 – Waste capacity
- Policy 5.18 – Construction, excavation and demolition waste
- Policy 5.20 – Aggregates
- Policy 5.21 – Contaminated land
- Policy 6.1 – Strategic approach
- Policy 6.7 – Better streets and surface transport
- Policy 6.9 – Cycling
- Policy 6.10 – Walking
- Policy 6.11 – Smoothing traffic flow and tackling congestion
- Policy 6.13 – Parking
- Policy 7.1 – Lifetime neighbourhoods
- Policy 7.2 – An inclusive environment
- Policy 7.3 – Designing out crime
- Policy 7.4 – Local character
- Policy 7.5 – Public realm
- Policy 7.6 – Architecture
- Policy 7.7 – Location and design of tall and large buildings
- Policy 7.8 – Heritage assets and archaeology
- Policy 7.11 – London view management framework
- Policy 7.12 – Implementing the London view management framework
- Policy 7.13 – Safety, security and resilience to emergency

- Policy 7.14 – Improving air quality
- Policy 7.15 – Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscape
- Policy 7.19 – Biodiversity and access to nature
- Policy 7.21 – Trees and woodland
- Policy 7.22 – Land for food

Draft New London Plan Policy

- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy infrastructure
- Policy SI4 Managing heat risk
- Policy GG6 Increasing efficiency and resilience
- Policy SI12 Flood risk management
- Policy SI13 Sustainable drainage
- Policy SI7 Reducing waste and supporting the circular economy
- Policy GG6 Increasing efficiency and resilience
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy GG3 Creating a healthy city
- Policy SI1 Improving air quality
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.2 Office parking
- Policy T6.3 Retail parking
- Policy T6.4 Hotel and leisure uses parking

- Policy T6.5 Non-residential disabled persons parking
- Policy T7 Deliveries, servicing and construction
- Policy D13 Noise
- Policy G1 Green infrastructure
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G4 Open space
- Policy GG2 Making the best use of land
- Policy SI16 Waterways – use and enjoyment
- Policy SI5 Water infrastructure
- Policy GG1 Building strong and inclusive communities
- Policy E2 cost business space
- Policy E3 Affordable workspace
- Policy E9 Retail, markets and hot food takeaways
- Policy HC5 Supporting London’s culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy E11 Skills and opportunities for all

The Mayor’s Supplementary Planning Guidance

The Mayor’s Sustainable Design and Construction Supplementary Planning Guidance 11 (referred to hereafter as ‘the SPG’) provides detailed guidance on how to implement The London Plan policies. The SPG sets standards for new developments that is referable to the Mayor and the Greater London Authority (GLA). The proposed development is a Major development referable to the Mayor and uses the Mayor’s Sustainable Design and Construction SPG as a framework for this Sustainability Statement to ensure a comprehensive review of the proposal’s environmental and sustainability performance.

The role of the SPG is to set clear targets and highlight efficient ways to reach these. Setting clear sustainability and performance targets helps shape the brief to which the design team will respond. The SPG sets out a number of ‘priority’ and ‘best practice’ standards that should be addressed by Major new developments. All the ‘priority’ targets should be addressed by Major development proposals whilst the SPG

¹¹ Mayor of London (August 2017). *London Environment Strategy Dr Aft For Public Consultation*. GLA. https://www.london.gov.uk/sites/default/files/8314_gla_les_online_single_page.pdf

strongly encourages the ‘best practice’ ambitions to be adopted. The SPG recognises that implementing the guidance will enable the fullest contribution to sustainable design and construction by a development but that the approaches should be adapted to the specific characteristics of the development.

The Mayor has set out the priorities and best practice ambitions under the following overarching topics:

Resource Management

- Land
- Site layout and Building Design
- Energy and carbon dioxide emissions
- Carbon dioxide off-setting
- Retrofitting
- Monitoring energy use
- Supporting a resilient energy supply
- Water efficiency
- Materials and waste
- Nature conservation and biodiversity

Climate change adaptation

- Tackling increased temperature and drought
- Increasing green cover
- Flooding
- Pollution Management
- Land contamination
- Air quality
- Noise
- Light pollution
- Water pollution

Mayor’s London Environment Strategy

The Mayor of London, has recently published his draft London Environment Strategy which includes a range of actions to improve the environment now, setting London on the path to create a better future¹². This is the first strategy to bring together approaches from every aspect of London’s environment. It is divided into the following areas:

- Air quality
- Green infrastructure
- Climate change mitigation and energy
- Waste
- Adapting to climate change
- Ambient noise

The following four strategic approaches inform all aspects of the Strategy which require a holistic approach to addressing London’s environmental challenges and make the most of environmental opportunities:

- Low carbon circular economy
- Smart digital city
- Green infrastructure and natural capital accounting
- The Healthy Streets Approach

This draft is currently out for consultation and is likely to be published in 2018.

Westminster City Plan (November 2016)

The Westminster City Plan forms part of Westminster’s Development Framework and is a local expression of Sustainable Development.

Below lists Westminster City Plan policies, with those relating to environmental performance and sustainable construction highlighted:

- Policy S1 – Mixed Use In The Central Activities Zone
- Policy S2 – Special Policy Areas
- Policy CM2.1 – Harley Street Special Policy Area
- Policy CM2.2 – Portland Place Special Policy Area
- Policy CM2.3 – Savile Row Special Policy Area

¹² Mayor of London Environment Strategy: https://www.london.gov.uk/sites/default/files/8314_gla_les_online_single_page.pdf

- Policy CM2.4 – St James’s Special Policy Area
- Policy CM2.5 – Mayfair Special Policy Area
- Policy S3 – Paddington Opportunity Area
- Policy S4 – Victoria Opportunity Area
- Policy S5 – Tottenham Court Road Opportunity Area
- Policy S6 – Core Central Activities Zone
- Policy S7 – West End Special Retail Policy Area
- Policy S8 – Marylebone And Fitzrovia
- Policy S9 – Knightsbridge
- Policy S10 – Pimlico
- Policy S11 – Royal Parks
- Policy S12 – North Westminster Economic Development Area
- Policy S13 – Outside The CAZ And NWEDA
- Policy S14 – Optimising Housing Delivery
- Policy S15 – Meeting Housing Needs
- Policy S16 – Affordable Housing
- Policy S17 – Gypsies And Travellers
- Policy S18 – Commercial Development
- Policy S19 – Inclusive Local Economy And Employment
- Policy S20 – Offices And Other B1 Floorspace
- Policy S21 – Retail
- Policy S22- Tourism, Arts And Culture
- Policy S23- Hotels And Conference Facilities
- Policy S24 – Entertainment Uses
- Policy S25 – Heritage
- Policy 26 – Views
- Policy S27 – Buildings And Uses Of International And National Importance
- Policy S28 – Design
- Policy CM28.1 – Basement Development
- Policy S29 – Health, Safety And Well-Being
- Policy S30 – Flood
- Policy S31 Air Quality
- Policy S32 Noise
- Policy S33 Delivering Infrastructure And Planning Obligations
- Policy S34- Social And Community Infrastructure
- Policy S35 – Open Space
- Policy S36 – Sites Of Importance For Nature Conservation
- Policy S37 – Westminster’s Blue Ribbon Network
- Policy S38 – Biodiversity And Green Infrastructure
- Policy S39 – Decentralised Energy Networks
- Policy S40 – Renewable Energy
- Policy S41 – Pedestrian Movement And Sustainable Transport
- Policy S42 – Servicing and Deliveries
- Policy S43 – Major Transport Infrastructure
- Policy S44 – Sustainable Waste Management
- Policy S45 – Flood-Related Infrastructure
- Policy S46 – Thames Tunnel
- Policy S47 – The Presumption In Favour Of Sustainable Development
- Policy CM47.1 – Land Use Swaps And Packages
- Policy CM47.2 – Credits

End