



CHURCH STREET

SITES A, B AND C

PLANNING STATEMENT



Planning Statement

Church Street Sites A, B and C

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1. Executive Summary

- 1.1 Westminster City Council (WCC) is working to create a world class City for All. Within this, City where residents live in a healthy and sustainable environment and have access to high quality, affordable homes. As a result of this, WCC have committed to delivering 20,000 new homes by 2040 of which at least 35% will be affordable.
- 1.2 Church Street Estate represents an exciting and excellent opportunity to adhere to WCC's world class City for All initiative and a significant opportunity to make better use of a well-connected, previously developed site, which could significantly meet WCC targets for growth. The Church Street Estate was first identified in 2010 as one of the five priority housing estates for housing renewal and as a result of years of consultation with WCC, residents of the Church Street Estate, local community groups and key stakeholders, WCC is committed to delivering a scheme that seeks the regeneration of the existing estate. This ambition is brought forward through the Hybrid Planning Application for the Church Street Estate to deliver a residential-led mixed-use development.
- 1.3 The Hybrid Planning Application will provide the framework for the Estate's redevelopment but will also secure the following benefits:
- Provide a high-quality residential neighbourhood for the community of Church Street existing and new;
 - Delivery of up to 1,121 high quality new homes, of which at least 50% will be affordable;
 - Re-provision of existing affordable homes with uplift, allowing existing residents the right to return;
 - Beautifully designed new homes with 100% dual aspect for Site A and commitment to achieve dual aspect where possible in the outline phases;
 - Tenure blind approach to facilitate a mixed and balanced community;
 - Adhering to WCC's net zero carbon approach through highly efficient new homes;
 - New public realm, which incorporates play space to meet all ages of play and high-quality landscaped open space and private/communal amenity space.
 - Comprehensive tree planting strategy and enhanced green space, such as green roofs to achieve an Urban Greening Factor above 0.4;
 - Incorporation of a sustainable urban drainage system;
 - Enhanced market infrastructure, such as storage and van parking for market traders to help those businesses flourish and promote opportunities for increased vibrancy and footfall;

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- A brand new library which is designed flexibly to incorporate different uses;
- Providing active frontages along Church Street and Edgware Road with a flexible solution to Class E space to adapt to the changing market.

1.4 This Planning Statement explores the proposal in more detail, describing the physical context of the site, the surrounding and emerging context, the history of the site and the consultation process. The Planning Statement also examines the proposal in the context of WCC and Greater London Authority ('GLA') adopted planning policies. Accompanying the Planning Statement is also a suite of design documents, technical and environmental reports that explains the scheme in more detail and assess the scheme's impact on infrastructure and the environment, which should be reviewed alongside the Planning Statement.

1.5 Overall, the Hybrid Planning Application brings forward an exemplary and high quality scheme at an appropriate density and includes a range of building typologies and heights. The proposed development will deliver significant benefits for residents and businesses. It is our view that the proposals are in accordance with the policies of the development plan and sits within the context of WCC vision for a City for All, and that any harm that might be identified is more than outweighed by the substantial and significant benefits of the scheme.

2. Introduction

2.1 This Statement is submitted on behalf of the Applicant, Westminster City Council (known as ‘the Applicant’), in support of a Hybrid Planning Application for the proposed estate regeneration of Church Street Sites A, B, and C (‘the Site’), located within the City of Westminster. The Local Planning Authority (‘LPA’) is Westminster City Council (‘WCC’). For the purposes of this application, “The Site” will be used to refer to the whole hybrid application area including Sites A, B and C, and “Site A”, “Site B”, and “Site C” will be used to refer to specific sites as required. As set out in further detail below, “the detailed element of the application” comprises Site A, and “the outline element of the application” comprises the remainder of the hybrid application boundary including Site B, Site C, and the Church Street market infrastructure. Sites A, B, and C are illustrated below.

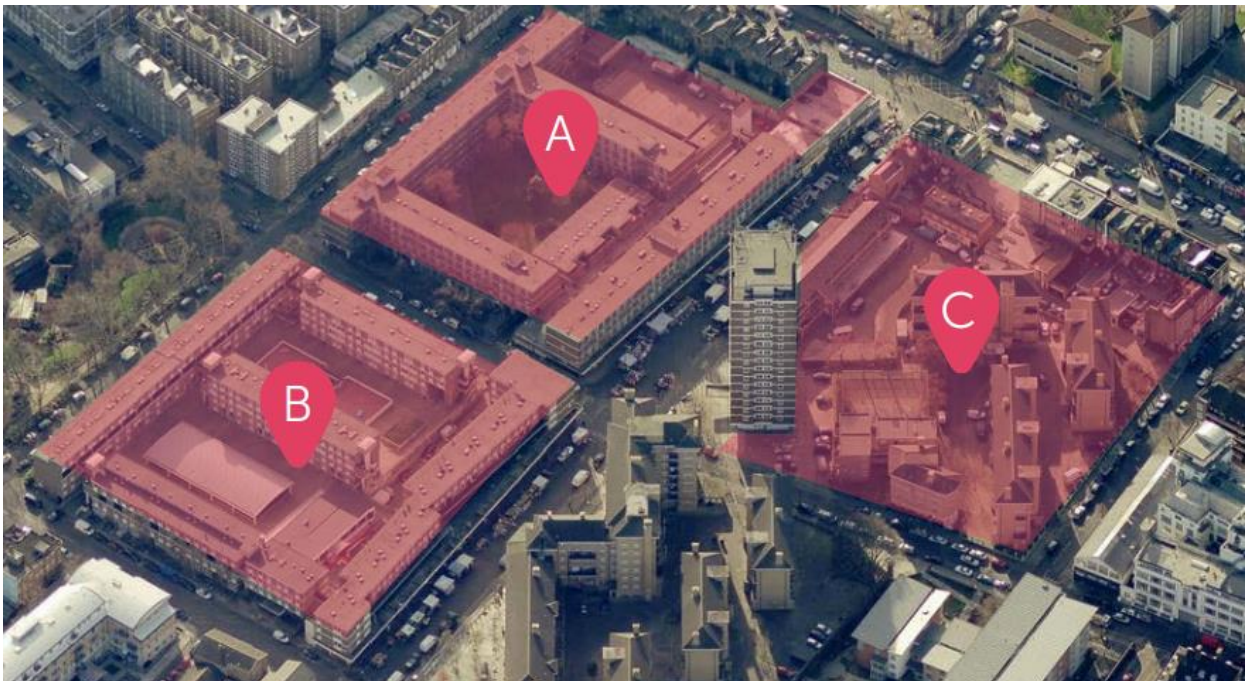


Figure 1: Aerial photograph illustrating Sites A, B, and C

2.2 In addition to the aerial photograph above, an image of the Detailed and Outline elements is provided below, illustrating Sites A, B, and C and the market infrastructure.

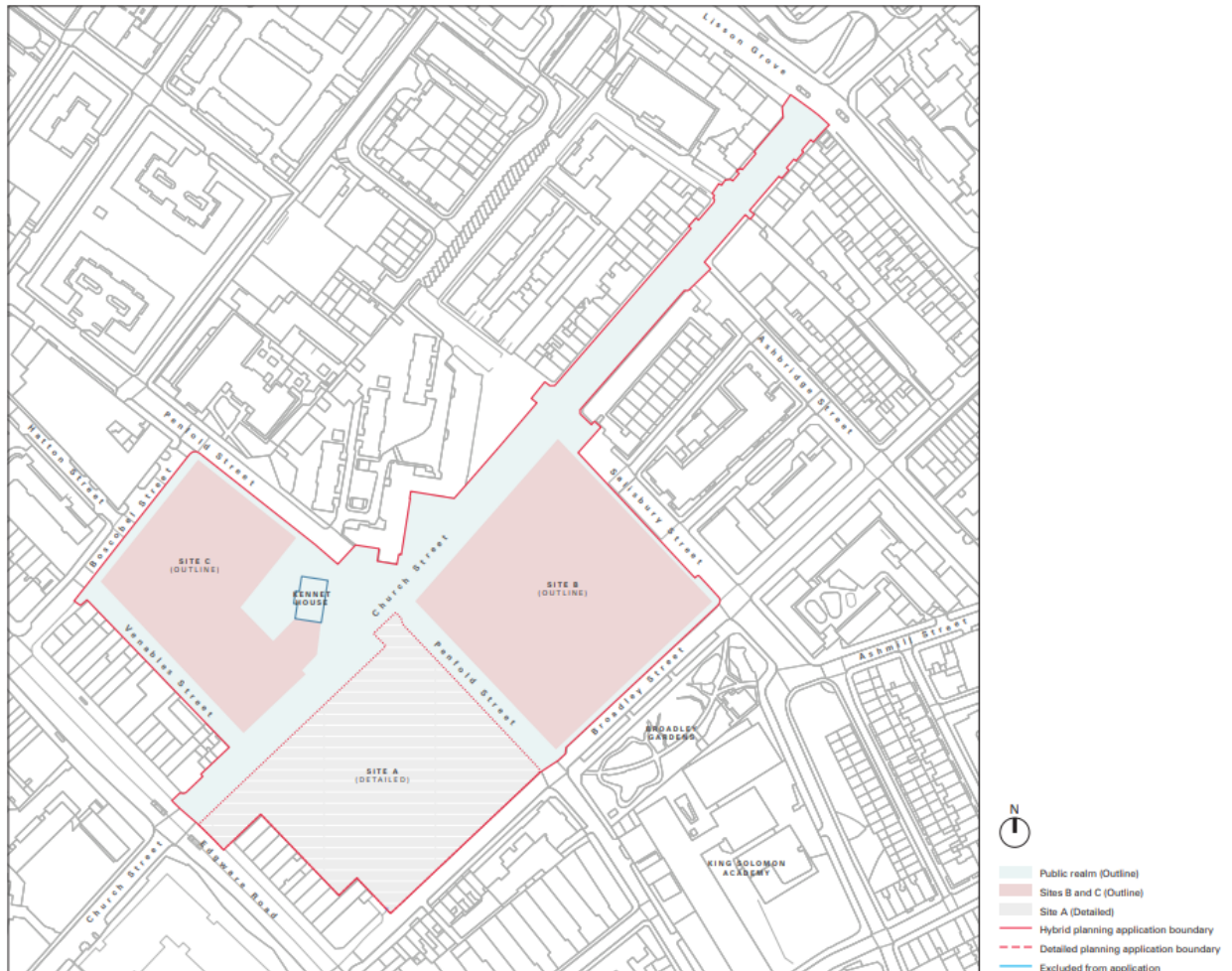


Figure 2: Detailed and Outline Elements

2.3 The full description of development is as follows:

The Hybrid Planning Application seeks part-detail/part-outline planning permission for the following (“the Proposed Development”): sought for:

Detailed planning application for Site A, for the demolition of all buildings on Site A and erection of mixed-use buildings providing ground floor flexible commercial use floorspace (use class E), a library (use class F1), market storage (use class B8), residential units (use class C3), landscaped amenity space, car parking, motorcycle parking, cycle parking, market infrastructure and associated works.

A Phased Outline planning application (Sites B, C and the Church Street Market) (all matters reserved) for the balance of the site for:

1. *The proposed demolition of buildings and structures;*
2. *The erection of buildings and works of alteration to existing buildings for the following uses:*

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- a) *Flexible Commercial Floorspace (Use Class E);*
 - b) *Community Floorspace (Use Class F1 and F2);*
 - c) *Public houses, wine bars, or drinking establishments Floorspace (Use Class Sui Generis);*
 - d) *Market Storage (use class B8), and*
 - e) *Residential Floorspace (Use Class C3) and ancillary residential facilities.*
3. *Associated infrastructure;*
 4. *Streets, open spaces, landscaping and public realm;*
 5. *Car, motorcycle and bicycle parking spaces and delivery/servicing spaces;*
 6. *New pedestrian and vehicular access;*
 7. *Market infrastructure and ancillary facilities;*
 8. *Utilities including electricity substations; and*
 9. *Other works incidental to the proposed development.*

Further explanation (not forming part of the formal description of development set out above):

Proposed Development for Site A comprises:

1. *The proposed demolition of all buildings on Site A;*
2. *The erection of buildings, including tall buildings, that could deliver up to:*
 - a) *429 Residential Units (Use Class C3) and ancillary residential facilities;*
 - b) *541 sqm (GIA) of Community Floorspace (Use Class F1);*
 - c) *711 sqm (GIA) of Commercial Floorspace (Use Class E);*
 - d) *1,124 sqm (GIA) of Market Storage Floorspace (Use Class B8); and*
 - e) *2,102 sqm (GIA) of plant & service and 1,511 sqm (GIA) of parking/deliveries hub.*
3. *Alterations to the existing access road;*
4. *Streets, open spaces, landscaping and public realm;*
5. *Car, motorcycle and bicycle parking spaces and servicing spaces;*
6. *Market infrastructure and ancillary facilities; and*
7. *Other works incidental to the proposed development.*

A Phased Outline planning application (Sites B – C and the Church Street Market) (all matters reserved) for the balance of the site as set out in detail in the accompanying Development Specification for:

1. *The proposed erection of buildings, including tall buildings, and works of alteration to existing buildings that could deliver:*
 - a) *Up to 2,789sqm (GIA) of flexible Commercial Floorspace (Use Class E);*
 - b) *Up to 459sqm (GIA) of Community Floorspace (Use Class F1);*
 - c) *Up to 66,698sqm (GIA) of Residential Floorspace (Use Class C3);*
 - d) *Up to 174sqm (GIA) of Public houses, wine bars, or drinking establishments Floorspace (Use Class Sui Generis);*
 - e) *Up to 3,398sqm (GIA) of Plant & Service;*
 - f) *Up to 3,776sqm (GIA) of Market Storage Floorspace (Use Class B8); and*
 - g) *Up to 6,989sqm (GIA) of Parking & Delivery Hubs.*
2. *Alterations to the existing access road;*
3. *Streets, open spaces, landscaping and public realm;*

4. *Car, motorcycle and bicycle parking spaces and servicing spaces;*
5. *Market infrastructure and ancillary facilities; and*
6. *Other works incidental to the proposed development.*

2.4 The proposed development has been designed with regard to the Westminster City Council and Greater London Authority ('GLA') adopted planning policies, and following extensive consultation with the local community over nearly 10 years, as well as a wide range of key stakeholders. This report considers the planning considerations arising from the proposed development. It assesses the proposals in the context of relevant planning policy and guidance and with regard to relevant material considerations.

3. Application Type & Overview

3.1 This planning application is submitted as a Hybrid Application, comprising a Full Detailed Planning Application ('Site A') and an Outline Planning Application with all matters reserved ('Sites B and C'). The Hybrid Application described above is supported by a number of application documents. Some of the documents are submitted for approval whilst others provide supporting information for the applications. In the case of the Outline Planning Application, a number of the application documents establish a set of binding parameters against which future reserved matters applications will be framed. This has allowed the Outline Planning Application to be subject to an Environmental Impact Assessment ('EIA'). Further details of the relevant documents are given below.

Full Detailed Planning Application (Site A)

3.2 The below documents are submitted for approval for the detailed element (Phase 1)

- Existing Drawings;
- Proposed Drawings; and
- Schedule of Proposed Uses

3.3 A detailed list of the drawings submitted as part of the full detailed planning application is provided within the submitted covering letter.

Outline Planning Application (Sites B and C)

3.4 The Control Documents that are to be approved identify the maximum parameters and the design guidelines for the Outline Application. The Control Documents are to inform the future design development of the Site, and comprise the following:

Development Specification

3.5 This document describes the principle components of the Illustrative Masterplan, including the description of development; the amount and uses of development; residential home numbers; open space provision; car and cycle parking; and indicative development phasing. It also provides the primary reference for understanding the nature of the planning applications and the suite of planning documents.

The Design Code

3.6 The Design Code provides WCC with certainty regarding the commitment to deliver the highest quality design. They are a set of design rules that focus on two and three dimensional elements of the design and captures those elements of the Illustrative Masterplan that are significant to its success. It is the Design Code's aim to provide clarity over what is considered acceptable design quality. Essentially, the Code should serve three main purposes:

- It should provide Design Guidance as part of the brief for architects and designers;
- It should provide a set of rules for the future design of reserved matters applications to adhere to through the use of could should and must and;
- It should document the aspirations that will serve to form future design guidance for long-term development.

3.7 In order to help visualise the Outline Application and what the proposed development envisages, a scheme has been developed and is presented as the 'Illustrative Scheme' of what could be built, based on the specified parameters. This is referred to throughout the application documents as the "Illustrative Masterplan" and is a one way in which of what could come forward. This Illustrative Masterplan is only indicative, and the actual detail of each part of the proposed Phases in the Outline Application to be built will come forward only when Reserved Matters Applications ('RMA') are made.

The Parameter Plans

3.8 The Parameter Plans set the parameters associated with the scale, layout, access, circulation, and distribution of use classes and public space for the proposed development. They also establish the provide the primary design information to inform the preparation of subsequent RMA for all phases of the development. They should be read alongside the Design Code and Development Specification. The mandatory provisions of the Design Code will also need to be enshrined in suitably worded planning conditions on the granting of any permission in order to validate the methodology employed in the EIA. We are happy to discuss the wording of such conditions with the Council as the application progresses.

Key Submission Documents for the Hybrid Planning Application

3.9 The key supporting planning documents are as follows:

- The Planning Statement (this document), which sets out how the development responds to relevant planning policies and guidance. It also sets out the material planning benefits arising as a result of the Proposed Development;
- The Design and Access Statement ('DAS'), addresses the outline component and the detailed component of the proposals in turn. It explains the detailed development proposed as part of Site A, and for the outline elements, the context within which design details would come forward at later stages as RMA for future phases. The document describes how the amount, scale, layout, appearance, landscaping, and inclusive design and community safety issues, have been developed, in consultation with stakeholders and the local community;
- An Environmental Statement ('ES') has also been submitted as part of the Hybrid Application. This document contains the technical environmental assessments that have been undertaken to understand the environmental and socio-economic effects of the Proposed Development. For the detailed planning application, the statutory procedure of producing an Environmental Statement

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has been undertaken as all the details of the application are agreed and finalised in this submission. This includes preparing the Environmental Statement with competent experts and obtaining relevant environmental information from the statutory consultation bodies and also consulting any appropriate non-statutory bodies that also have relevant information. For the outline planning application the Environmental Statement (ES) has been based on the Control Documents; and

3.10 The following additional technical reports which are not included within the ES:

Table 1: List of application documents submitted in support of the Hybrid Planning Application

Document
Existing Drawings
Proposed Drawings
Schedule of Proposed Uses
Development Specification
Parameter Plans
Design Code
Site Location Plan 1:1250
Block Plan or Site Layout Plan
Drawing Schedule
Schedule of Uses
3D Model
Site Survey Levels
Design & Access Statement incl. <ul style="list-style-type: none">- Landscaping / Open Space Strategy- Crime Prevention Statement- Details of proposed materials for any external cladding including fire safety measures
Transport Assessment incl. <ul style="list-style-type: none">- Framework Travel Plan- Delivery & Servicing & Waste Management Plan- Construction Logistics Plan- Car Parking Management Plan
Fire Statement
Health Impact Assessment
Structural Survey / Structural Methodology Statement
Ventilation / Extraction Statement
Estate Management Strategy
Signed Draft Appendix A checklist from WCC Code of Construction Practice (for Level 1 and 2 major schemes)
Signed Draft Appendix A checklist from WCC Code of Construction Practice (for basements)
Planning Obligations Draft Heads of Terms

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Environmental Statement & Appendices
Planning Statement
Estate Regeneration Statement incl. <ul style="list-style-type: none">- Consultation and Engagement Summary- Resident Rehousing and the Decant Strategy- Existing Retailers and the new Church Street Estate<ul style="list-style-type: none">• Retail Marketing Statement• Economic Statement
Financial Viability Assessment / Affordable Housing Statement
Equalities Impact Assessment
Tree Survey / Tree Constraints Plan / Arboricultural Implications Assessment
Statement of Community Involvement
Energy Assessment incl. <ul style="list-style-type: none">- Overheating Assessment
Sustainability Appraisal
Circular Economy Statement
Flood Risk Assessment incl. <ul style="list-style-type: none">- London Sustainable Drainage Pro-forma (Detailed Element)- Preliminary Sustainable Drainage (SuDS) Design Strategy (Outline Element)
Foul Sewage and Utilities Assessment
Acoustic Statement (Detailed Element)
Preliminary Environmental Risk Assessment (Ground Conditions and Contamination)
Desk Based Archaeological Assessment
Daylight/Sunlight Assessment
Biodiversity survey and report (Preliminary Ecological Assessment)
Ecology Planning Advice Design Access Statement and Construction Environment Plan
Whole Life Cycle Carbon Assessment
Lighting Assessment

4. Site and Surroundings

The Site: Overview

4.1 The Site is located at Church Street, London, which is known as:

- land bounded by Edgware Road, Church Street, Penfold Street, and Broadley Street (Site A);
- land bounded by Penfold Street, Church Street, Salisbury Street, and Broadley Street (Site B);
- land bounded by Edgware Road, Boscobel Street, Penfold Street, and Church Street (Site C); and
- Church Street Market Infrastructure.

4.2 An overview of the Site is illustrated below which illustrates the Church Street Masterplan:

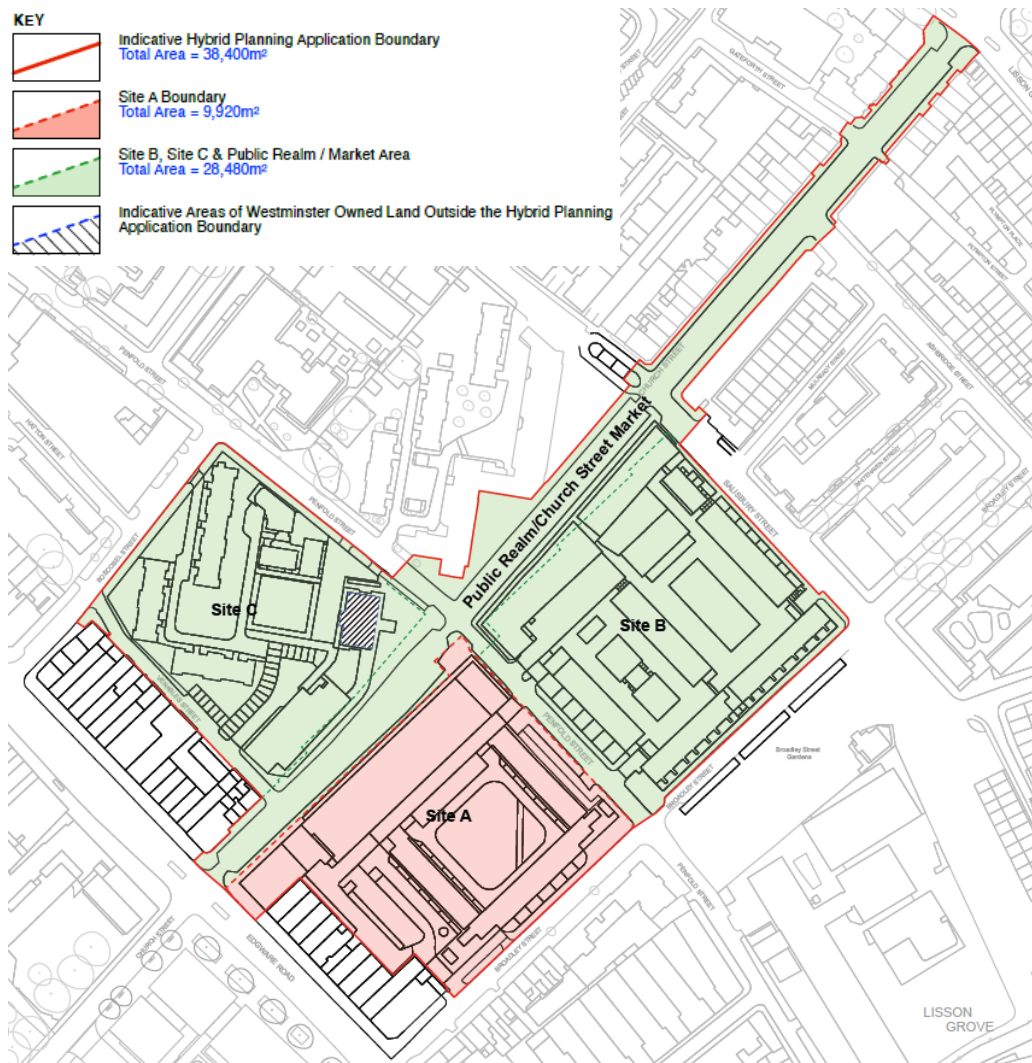


Figure 3: Site Location Map

4.3 The Site is approximately 3.84 hectares.

4.4 For this Hybrid Planning Application, the following existing uses are included within the red line:

- 400 residential units including 228 affordable housing units;
- Church Street External Market Infrastructure;
- Church Street Library;
- Market Chemist Pharmacy;
- Commercial units along Church Street and Sinbad Supermarket and Ladbrokes on Edgware Road;
- The Lord Admiral Pub.

4.5 Specifically, the existing buildings included within the Site comprise:

- Blackwater House;
- Cray House;
- Pool House;
- Ingrebourne House;
- Lambourne House;
- Wandle House;
- Medway House;
- Ravensbourne House;
- Eden House;
- Church Street Library;
- Lea House;
- Roding House;
- Colne House;
- Derry House;
- Isis House;
- Windrush House;
- Darent House; and
- Mole House.

4.6 Additionally, excluded from the red line of the Site are:

- Kennet House; and
- Commercial units along Edgware Road.

4.7 Existing building heights are predominantly 3 to 5 storeys within the Site. Whilst excluded from the red line, Kennet House sits at the centre of the Site areas and rises to 16 storeys. The section at the entrance of Church Street between Site A and Site C from Edgware Road is primarily residential-led buildings typically ranging in height between 4 and 5 storeys. At the ground floor, the uses are primarily commercial (Class E) along the Church Street. Site C, located at the northwest section of the Site, is characterised by mid-scale residential buildings with an average of 4 to 5 storeys.

- 4.8 Site A is marked by a large ground floor coverage ratio with a mix of smaller and mid-scale buildings ranging between 2 to 4 storeys.
- 4.9 The residential within the Site comprises 30,661 sqm (GIA) of floorspace, formed of 18 buildings across the Site as set out above. For Site A and B, buildings have a distinctive post-war characteristic being medium rise at 4-5 storeys in height, flat roofs, and are generally orientated to face in line with the road network, position outwards with the public realm located in the centre of the Site. Similarly, Site C comprises post-war buildings of 3-5 storeys with Kennet House being 16 storeys and is positioned at an angle to the road network with movement space surrounding the Site.
- 4.10 The existing mix for each Site is as follows:

Table 2: Existing unit mix across Site A

	Bedroom	Social rented	Market	Total
Site A	1	58	6	64
	2	0	22	22
	3	40	18	58
	4	0	1	1
Total	N/A	98	47	145

Table 3: Existing unit mix across Site B

	Bedroom	Social rented	Market	Total
Site B	1	62	38	100
	2	3	36	39
	3	19	15	34
	4	1	2	3
Total	N/A	85	91	176

Table 4: Existing unit mix across Site C

	Bedroom	Social rented	Market	Total
Site C	1	27	11	38
	2	8	10	18
	3	8	7	15
	4	2	6	8
Total	N/A	45	34	79

- 4.11 Overall, the existing unit mix for the whole Site is provided below.

Table 5: Overall existing unit mix across the whole Site

	Bedroom	Social rented	Market	Total
Site	1	147	55	202
	2	11	68	79
	3	67	40	107
	4	3	9	12
Total	N/A	228	172	400

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- 4.12 As set out in the table above, the total existing units across the site is 400.
- 4.13 The Site currently comprises 6,020 sqm (GIA) of Class E (formerly Use Class A1 – A3) floorspace. This is predominantly located on Church Street at ground floor level. This comprises a variety of commercial units including convenience shops, in addition to more specialist comparison goods shops. This also includes Westminster Regeneration Base (Class E), which is located within Blackwater House (and Site A) and acts as a drop-in hub for residents and businesses along the historic market to be kept informed about the proposed regeneration and a space for council staff to work.
- 4.14 The Site also features the historic Church Street Market, formerly named Portman Market, which has been operating since 1830. This Market is located by the junction at Edgware Road and Penfold Street and stretches 125 metres in distance both east and west. The market initially sold hay before the introduction of the sale of food produce that helped develop the market into a thriving hub. Today, it is formed of 220 market pitches, with some of the traders operating from the Site for generations.
- 4.15 The market is a key part of the local area and sells a range of products including food produce, clothing, and other convenience items to the local population at affordable prices. In particular, the market's vibrant aspect contributes to the unique character of the area and its vitality.
- 4.16 The Site includes community floorspace comprising Church Street Library. The Church Street Library is located on the southern side of Church Street and has been in existence since the late 1960s. Whilst the Library is well used and frequently visited, it is currently inefficiently located in terms of layout and lacks visibility due to being located in a less visible part of the Site. The basement is outdated with low light levels. There is an opportunity for the library to be relocated in a more prominent and visible location on Church Street, and for the layout to be much more efficient to deliver the highest quality usable space for the community. The existing library comprises three floors and provides a number of important functions for Church Street residents including study spaces, a learning centre including a computer room, meeting rooms, and open learning provision.
- 4.17 There are also a variety of other uses within the existing site including dentist, recreational courts, a community business, community hall, Vital Business Centre and a pub.
- 4.18 Focusing on the pub, which is known as Lord Admiral Pub is located on Site and classified as Use Class Sui Generis. The Lord High Admiral is located at ground floor with residential properties located above. There is also 159sqm of Sui Generis floorspace located on Site A, in the form of a betting shop.
- 4.19 There is also the a business known as 'Asylum Aid', located at ground floor of Derry House, a four-storey building with residential units located at floors 1–3, within Site C and can be accessed via Penfold Street.
- 4.20 The Site is not within a designated area of open space deficiency under the City Plan, but the surrounding Church Street / Edgware Road area is deficient in open space as stated in paragraph 6.5 of the WCC City Plan. The Site has a low-quality urban character, further reduced by a lack of sufficient public realm, primarily hard landscape, a lack of seating opportunities, and insufficient lighting.

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- 4.21 Nearby the Site is Lisson Garden, which is designated as a Site of Importance for Nature Conservation and provides a valuable green space to the Site, in addition to Broadley Street Gardens located to the east of the site.
- 4.22 The overall public realm is largely dominated by vehicles, with busy roads and on-street parking throughout. There are currently limited designated cycle routes and pedestrians are generally restricted to narrow footpaths which offer limited opportunity for seating or gathering spaces.
- 4.23 Church Street Market operates 6 days a week from Monday to Saturday; the weekday market extends from Edgware Road to Salisbury Street. The Saturday market stretches further from Edgware Road to Lisson Grove. There are two banks of pitches, each set to the north and south kerbsides of the street. The weekday market is spread along the length of the street with approximately 60% occupancy (on Thursday the busiest weekday) and a mix of permanent and temporary licenced traders. Regarding Saturday, the market is fully occupied with high representation from permanent licenced traders.
- 4.24 The Site's Public Transport Accessibility Level (PTAL), due to its size, varies. This includes partly PTAL 6a ('excellent') and partly PTAL 6b ('best'). These ratings indicate an excellent level for access to public transport and optimal transport infrastructure throughout the area for the local community. The forecast PTAL ratings for 2021 and 2031 continues to be 6a and 6b. The PTAL rating in the Site makes it one of the most accessible areas in the local area and indeed the City of Westminster.
- 4.25 Edgware Road is the nearest rail station, directly to the south of the Site and is served by London Underground services. The northern side of the road is served by the Bakerloo Line, and the southern side is served by the District, Circle, and Hammersmith and City Lines. The Site also benefits from well-connected infrastructure, particularly London Marylebone railway station and Paddington railway station, which is 0.5 miles east of the Site and 0.8 miles south of the Site connecting the Site to surrounding areas. Therefore, local residents are offered regular and convenient services to Central London.
- 4.26 The Site is also situated adjacent to a significant road network with Edgware Road located west of the Site. Edgware Road is part of the strategic road network, providing links to the surrounding areas including Paddington and Hyde Park, Regent's Park and St Johns Wood and Marylebone and Baker Street heading east at its junction with the Marylebone Road. There are 33 off-street car parking spaces and occupiers hold 150 on-street residential parking permits across the Site.
- 4.27 With respect to bus routes, the Site is situated by the Church Street Market bus stop that connects the Site to a number of key locations in Central London including Paddington, Holborn, and Victoria, and suburban London locations including Cricklewood. Easy access to these locations strengthens the Site's connectivity levels to the wider area. A cycle docking station is available at Penfold Street, situated within the Site, which provides 15 Santander Cycles for people to hire.
- 4.28 Focusing on heritage, the Site does not feature any buildings that are designated as statutory listed or locally listed buildings within its proposed development boundary, nor is it located within a Conservation Area. However, the neighbouring context includes the Grade II* listed Marylebone Lower House and sculpture as part of the North Westminster Community School, which are approximately 100 metres south-east of the Site. Situated marginally south of the site boundary are the Miles Buildings that line Penfold

Street, considered to be unlisted buildings of merit. Similarly, at an approximate distance of 30 metres directly north of the site boundary are the Wallis Building, Tadema House and Eastlake House, also considered to be unlisted buildings of merit. These are illustrated in the historic map below:

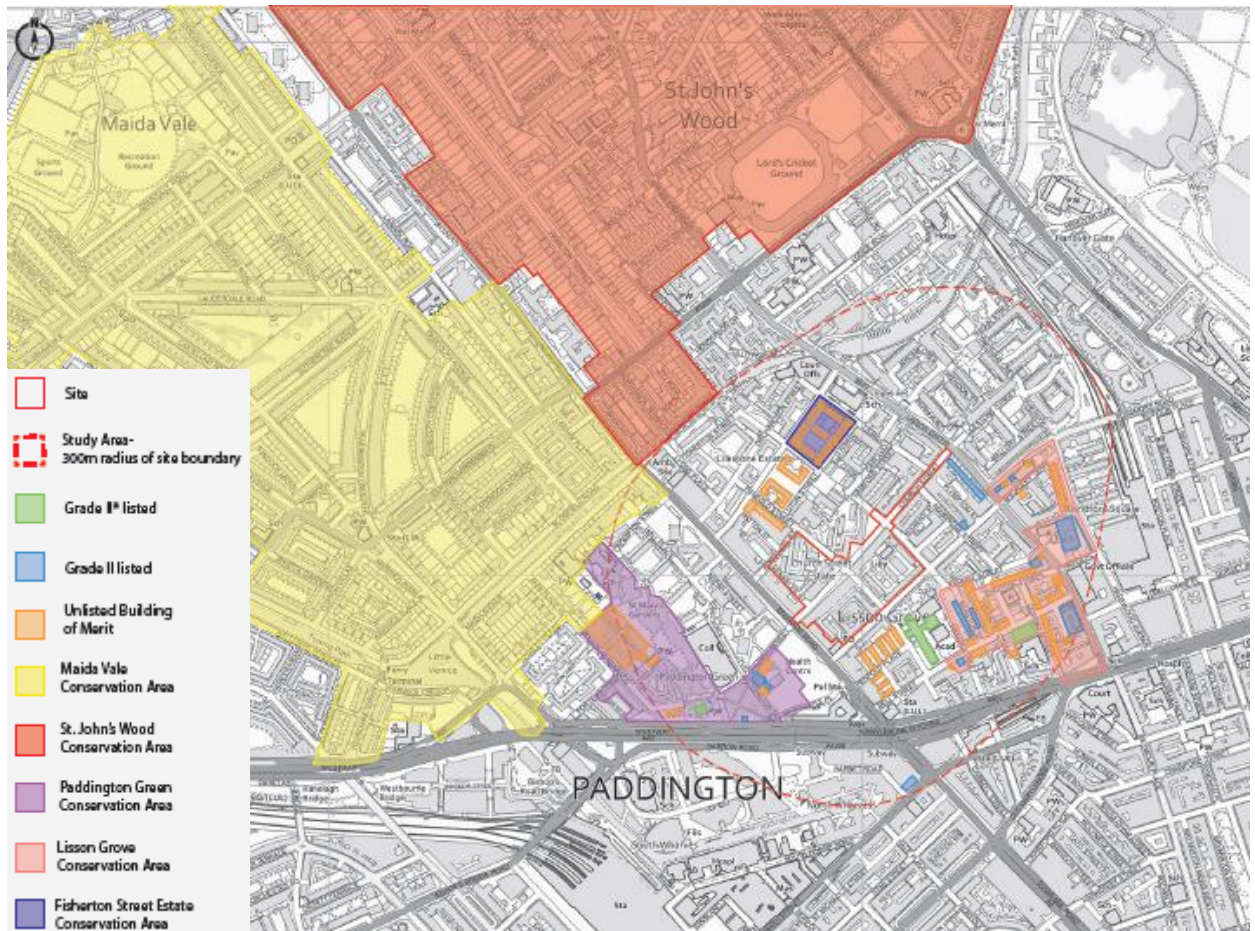


Figure 4: Map illustrating the conservation areas and heritage assets

- 4.29 As stated above, the Site is not located within a Conservation Area but does neighbour several Conservation Areas. The Fisherton Street Estate Conservation Area is located north of the Site, and to the east of the Site is the Lisson Grove Conservation Area. Within the wider context is the Paddington Green Conservation Area to the west, and the Maida Vale Conservation Area to the north-west.
- 4.30 The Conservation Area Audit for Paddington Green (2003) identifies unlisted buildings of merit at Church Street, which are nos. 149 to 151. These are to the northeast of the Site.
- 4.31 Following an online review of the Environment Agency Flood Map for Planning, it has been concluded the Site is located in Flood Zone 1.
- 4.32 The Council's online records states there are no known Tree Preservation Orders ('TPO') on the Site.

Site A

- 4.33 Site A is approximately 0.9927 hectares.
- 4.34 Site A is bounded by Church Street to the north, Penfold Street to the east, and Broadley Street to the south. It is located directly east of Edgware Road. It comprises Blackwater House, Cray House, Pool House, Ingreboune House, and Lambourne House.
- 4.35 As noted above, Blackwater House fronts onto Church Street to the north and is four storeys in height, housing commercial units including the pub and Westminster Regeneration Base at ground floor and residential premises above. All uses are accessed via Church Street, with the residential premises entering at street level through designated entrances in-between the retail units.
- 4.36 To the south of the Site accessed via Broadley Street is Lambourne House, which extends the length of the urban block and is five storeys in height. The building is set back at roof level and houses residential premises throughout. On the western side of the building at street level, there is a pedestrian and a vehicular access route that leads into Site A at ground level.
- 4.37 The pedestrian access also provides a route into the centre of Site A where the private garden is located. Connected on Lambourne House's eastern side is Pool House which fronts onto Penfold Street at five storeys in height, and connected on its western side is Ingrebourne House which is also five storeys and backs onto a paved area behind the Edgware Road premises.
- 4.38 Located adjacent to Blackwater House but partly within the centre of Site A is the Cray House, a residential premises.
- 4.39 The public realm space located within the centre of Site A is formed of a communal garden surrounded by residential buildings up to 5 storeys.

Site B

- 4.40 Site B is approximately 1.0977 hectares.
- 4.41 Site B is bounded by Church Street to the north, Penfold Street to the west, and Broadley Street to the south, and Salisbury Street to the east. It is made up of Wandle House, Medway House, Ravensbourne House, Lea House, Roding House, and Eden House.
- 4.42 Church Street Library is located in Site B on the southern side of Church Street and there is a court at basement level which is locked and unused. There is an existing pharmacy called Market Chemist which fronts Church Street.
- 4.43 To the north of the site stretching from east to west is Eden House which is four storeys in height and comprises commercial units at ground floor and residential premises above. The entrance to the Church Street Library is also at ground level which goes through the Eden House to the Library entrance behind the building. There is a concrete court located at basement level which is in poor condition and underused.

Site C

- 4.44 Site C is approximately 0.844 hectares.
- 4.45 Site C is bounded by Church Street to the south, Penfold Street to the east, Boscobel Street to the north, and Venables Street to the west, located east of Edgware Road. It is formed of Kennet House, Darent House, Windrush House, Mole House, Isis House, Derry House, and Colne House and courts at ground floor level.
- 4.46 On market days, Church Street is pedestrianised to make way for stall set up and individual shopping.

Surrounding Context

- 4.47 The surrounding context is dynamic with a number of significant retail districts, residential areas, and amenity spaces. In particular, the Edgware Road district centre is located west of the site, Regent's Canal is located north of the site, and east of the site is the Lisson Grove.
- 4.48 The Site has a multicultural identity, with the southern-most part of the road known for its Arabian culture with a number of Lebanese restaurants and shisha cafes that line the street. Edgware Road also plays an important role as a major arterial route into the central London road network providing the primary north south route for public transport, cars and pedestrians. It was originally laid out to suit the movement of goods and people, and continues to serve this purpose. Edgware Road's heritage, history, and cultural character shapes its multi-functional purpose as a hub for movement, amenity, shopping and visitor attractions.
- 4.49 The Regent's Canal provides amenity value and historic attraction to the area. Its main connection locally runs from Kensal Town, over Regent's Park to Camden.

Emerging Context

- 4.50 The emerging context surrounding Church Street is changing, with a number of planning permissions granted or applications under determination, setting the emphasis of change within the City of Westminster. The following list sets out a number of planning applications considered relevant to the changing context and characteristics of the area surrounding Church Street (but not limited to):
- West End Green (Ref: 16/11562/FULL): Planning permission granted in December 2017 for the redevelopment to provide buildings ranging between 6 and 38 upper storeys to provide up to 691 residential units. Construction is underway, with part of the site already built out.
 - Luton Street (Ref: 17/08619/FULL): Planning permission granted in March 2019 for the redevelopment of the site to provide two 6-storey buildings and a row of 3-storey townhouses comprising up to 168 residential units with ancillary facilities, energy centre and sports hall. This permission is currently under construction.

- One Merchant Square (Ref: 18/05018/FULL): Resolution to planning permission in April 2019 subject to Section 106 legal agreement for the redevelopment of the site comprising the erection of a 42 storey building and a 21 storey building, providing 426 residential units, retail floorspace, and leisure floorspace.
- Two Merchant Square (Ref; 10/09757/FULL): Planning permission granted in May 2011 for the erection of a 17 storey building that comprises the provision of a mix of uses including residential accommodation, offices, hotel, retail, medical, and community facilities. The construction for this scheme started in August 2015.
- Paddington Exchange (North Wharf Gardens) Phase 2 East (Ref: 13/11045/FULL and S73 Ref: 16/12289/FUL): Planning permission granted in July 2014 (original permission) for the erection of buildings between 6 and 20 storeys providing up to 335 residential units and 23,156 sqm of hotel floorspace. This permission commenced in October 2016.
- Paddington Triangle (Ref: 12/07668/FULL): Planning permission granted in February 2014 for the development of an office building comprising 21 storeys of offices measuring up to 34,184sqm and Class E at canal-side and first floor of the building.
- Paddington Cube (Ref: 16/09050/FULL and S73 Ref: 18/08240/FULL): Planning permission granted in December 2016 for the demolition of existing buildings and mixed-use redevelopment comprising a commercial cube providing up to 50,000 sqm floorspace of office and commercial uses, retail and café/restaurant uses at lower levels and top floor level and a new underground station entrance and new Bakerloo Line Ticket Hall. This permission is currently under construction.
- Paddington Green: A Police Station located at the junction between Harrow Road and Edgware Road and bound by Newcastle Place to the north and Paddington Green to the west, a planning application (Ref: 21/02193/FULL) was submitted for the redevelopment of the site to provide three buildings ranging in heights between 15 and 32 storeys, providing 556 residential units, of which 210 units are affordable. Commercial uses including flexibility community/affordable workspace and the provision of private and amenity space are also proposed. The application went to WCC Planning Committee on 7th September 2021. The Planning Committee resolved to refuse planning permission for the scheme, against officer's recommendation for approval. The application will now be referred to the Mayor of London. A decision is awaited.

Planning History

4.51 Appendix 1 provides a full overview of the planning history relevant to this Site.

5. Pre-Application Discussions & Consultation

5.1 The importance of pre-application engagement is set out in the National Planning Policy Framework ('NPPF') (2021) in which Paragraph 39 states that "*Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community*", further emphasised in the accompanying Planning Practice Guidance ('PPG'). Further to this, the NPPF emphasises that there is significant potential to improve the efficiency and effectiveness of the planning application system for all parties through early engagement between local communities, local planning authorities, and developers prior to the submission of a planning application.

5.2 In accordance with the NPPF, the public and key local stakeholders have been consulted extensively as part of the design development process. Details of the consultation undertaken to date are summarised below and provided in detail within the supporting Statement of Community Involvement ('SCI'). The following pre-application discussions and consultations are discussed in this Chapter:

- Public Consultation with local residents and stakeholders;
- Consultation with the Local Planning Authority Westminster City Council (WCC);
- Consultation with Greater London Authority ('GLA');
- Consultation with Transport for London ('TFL'); and
- Designing Out Crime Officer from the Metropolitan Police.

Public Consultation

5.3 From the outset, WCC have been committed to redeveloping the Church Street Estate sensitively and in coordination with the needs and requirements of both the existing estate residents, and other surrounding consultees.

5.4 Accordingly, the Estate Regeneration Statement and SCI submitted with this application provide comprehensive details of the breadth and diversity of the consultation undertaken in developing these proposals.

5.5 Engagement with the local community has been fundamental to the principle and evolution of the estate's redevelopment, with its renewal having been a topic for discussion since 2013. The public consultation with the existing residents and surrounding consultees has demonstrated the want to see the area being revitalised for high-quality residential neighbourhood that embodies excellent quality of life for residents and improves the health and wellbeing of local residents.

5.6 As set out in the SCI, the Public Consultation consisted of a resident's ballot in 2013 and seven phases of engagement between September 2017 and July 2021 with stakeholders and the local community. The

feedback collected during each phase has helped the Applicant to shape the proposals. The consultation has consisted of:

- 5.7 **First Public Consultation:** in 2013, the Applicant asked for community feedback on a scheme that had previously received an 87.5% 'yes' vote, with a voter turnout of 25.5%. Although, the majority of people backed the development of a scheme at the time it was ultimately considered not financially viable to proceed and a decision was taken to develop the Church Street Masterplan. We have since taken the view that ballots are a poor metric for measuring community appetite for regeneration, Instead, a long-term engagement model has been adopted, rather than a ballot, to gauge support.
- 5.8 **Second Public Consultation:** A consultation was held regarding the Church Street Masterplan SPD in September 2017, and originally intended to run for four weeks, but was subsequently extended to seven weeks. The consultation was widely publicised, to ensure maximum awareness and included a permanent exhibition at 99 Church Street. Extensive outreach to local groups and organisations was pursued, involving a number of presentations and meetings. All of the consultation material, including feedback forms, exhibition boards, and other such materials were made available online, to ensure maximum exposure across all channels.
- 5.9 The consultation was effective in reaching large numbers of local stakeholders. In summary:
- 350 residents viewed the consultation exhibition;
 - A further 360 residents were engaged with via outreach events;
 - Seven local schools were visited;
 - 120 completed feedback forms were returned;
 - 152 comment cards were received;
 - 3,400 people visited the consultation website; and
 - 6,000 copies of newsletters and a scheme summary document were distributed around Church Street.
- 5.10 The key feedback given during this consultation was:
- The delivery of new homes in Church Street was identified by a majority of respondents as being the most important element of the Proposed Development;
 - 54% of respondents supported higher residential density in the area;
 - Respondents welcomed the proposed mix and balance of different types and tenures of homes;

- 75% of respondents stated that they felt that the current Church Street Market layout could be improved; and
- 80% of the respondents showed support for a Health and Wellbeing Hub on Lisson Grove.

5.11 **Third Public Consultation:** November and December 2018, a follow up consultation was held with the local community, to ask if the key themes set out in the Masterplan SPD, continued to be the community's key priorities to be addressed by any regeneration of the area. These key themes were:

- The delivery of more homes, particularly affordable homes;
- Improved health and wellbeing outcomes for the community;
- Better shops and a more vibrant Church Street Market; and
- Improved connectivity, both within Church Street Ward and with neighbouring areas.

5.12 The consultation ran for four weeks, beginning with a workshop for 'engaged residents' on 27 October 2018. 27 residents attended this workshop and gave clear indications of what their priorities were for each site. The consultation included a permanent exhibition at 99 Church Street, community outreach, specific events for some individual blocks, door knocking, and an online questionnaire. 162 responses were received in total.

5.13 Respondents were asked to rank their priorities for Church Street, in order of importance:

- 71% identified that providing new homes was one of their priorities in the regeneration of Church Street;
- 57% identified Health and Wellbeing as one of their priorities in the regeneration of Church Street;
- 48% identified supporting the shops and retail market in Church Street as one of their priorities; and
- 35% of respondents said improving access was one of their priorities.

5.14 Overall, the Priorities Consultation reaffirmed that the key themes set out in the Church Street Masterplan remained the community's key priorities for the future regeneration of Church Street.

5.15 **Fourth Consultation.** Between March 2019 to April 2019, a consultation ran focusing on the design proposals for the Site. This consultation focuses on four design options to be brought forward for the Site:

- Option 1 – Maintenance;
- Option 2 – Refurbishment;

- Option 3 – Part development, part refurbishment; and
- Option 4 – Full redevelopment.

5.16 Again, the consultation was widely publicised to ensure maximum awareness, with numerous publicity methods employed by WCC to reach the maximum number of residents as set out below:

- 6,000 copies of invitation flyers were sent to residents and businesses in the whole Church Street Ward. The flyer listed the dates of the exhibition and drop-ins;
- 160 posters were displayed on noticeboards across the Church Street area from April;
- Community stakeholders had posters displayed on their windows and flyers were left with the consultation details;
- A website detailing the options and giving an opportunity to fill in the feedback form went live before 7 March and can be found here: Churchstreet.org;
- Engaged residents were sent a letter inviting them to a launch workshop on 14 March;
- Tenants in Sites A, B, and C were sent letters inviting them to specific events aimed at residents of the sites;
- Leaseholder letters were sent to all leaseholders in Sites A, B and C, inviting them to events aimed at them and their concerns;
- A letter was sent to all tenants, inviting them to a Tenants Policy drop-in event;
- Invitation e-mails were sent to resident's associations, the neighbourhood forum, schools, Councillors, the MP, business forum, Church St Library, community organisations, Central Area Panel, and various youth clubs;
- Invitations were sent to market traders, inviting them to a dedicated market traders' lunch; and
- Invitations were sent to business within Church Street, inviting them to a dedicated business breakfast event.

5.17 Throughout the consultation period a public exhibition was open every weekday between 10am and 4pm at 35 Church Street. The consultation boards were on display and all consultation materials including the detailed booklet and the wooden model were available. The exhibition was advertised in all publicised material and from the second week of the consultation window vinyls were added to 35 Church Street to attract passers-by. A total of 236 people attended the exhibition at 35 Church Street, between 7 March 2019 and 30 April 2019.

Planning Statement

Church Street Sites A, B and C



- 5.18 There were various drop in sessions throughout the consultation based around the identified key priorities of the community. These were homes (2 attendees, 21 March 2019), health and wellbeing (5 attendees, 28 March 2019), making connections (2 attendees, 4 April 2019), and shops and market (5 attendees, 11 April). These themed drop-in sessions took place at 35 Church Street and happened on weekday evenings between 4pm and 7pm.
- 5.19 There were also drop-in sessions that were aimed at specific groups or stakeholders in the Church Street area. Three drop-ins were held at 35 Church Street aimed at leaseholders and their concerns. In total, 18 leaseholders attended these drop-ins, 13 attendees on 25 March 2019, 2 attendees on 1 April 2019, and 3 attendees on 8 April 2019. There was also a business breakfast for all business people in the area at 35 Church Street. 3 local business owners attended this breakfast.
- 5.20 There were five workshops held across the consultation period, with two taking place on Saturdays and the rest on weekdays. Two of these workshops were specifically aimed at identified engaged residents who were invited by written invitation. 32 engaged residents attended workshops on 20 March 2019 – 18 residents attended a lunchtime workshops and 14 residents attended an evening workshop. While attendees at this lunchtime workshop did not make any specific comments on the individual redevelopment options, they did indicate strong overall support for redevelopment in Church Street.
- 5.21 The key issues raised during these discussion sessions included the sound insulation of new homes, protecting daylight levels in existing buildings and on the streets, retaining and improving the market, parking issues, the right to return, green space and public realm, and the layout and design of new homes.
- 5.22 There were two further workshops which were open to all residents across Sites A, B, and C. This achieved a turnout of 12 people. Key themes include high quality design for homes, greater selection of shops and market, provision of more affordable clubs for young people to boost health and wellbeing, and connectivity and safety.
- 5.23 Throughout the consultation, WCC's Regeneration team has made proactive efforts to meet all residents within Sites A, B, and C via door knocking. WCC have knocked more than once at 188 properties, thus gathering a significant amount of feedback.
- 5.24 A website has been operational since the start of the consultation which gives detailed information about the background of this consultation and of the options being consulted on. It includes an online version of the questionnaire which gives people the opportunity to give their comments. The web address was advertised in all consultation publicity and literature. There have been 193 unique users to have visited the website and they have visited an average of 2.6 pages.
- 5.25 The public consultation led to an almost tied preferred opinion by the local community on Option 3 and Option 4 being the preferred options. The overwhelming message of this consultation was a desire from the Church Street community for change to be delivered on Site.
- 5.26 **Fifth Consultation.** The focus for the next phase of work was on the delivery of Site A. To ensure 'best value' as defined under Section 3 of the Local Government Act 1999, the Applicant sought views from residents in the Church Street area about how the Applicant could approach building the scheme. The

consultation held between January and February 2020 which provided the team with feedback on three proposed strategies for the redevelopment. The purpose was to gauge if there was any preference locally for a specific delivery model for Site A.

5.27 Three options were presented:

- A developer-led strategy
- A partnership strategy
- A direct delivery strategy

5.28 Consultation methods included sending flyers to every business and resident on Site A, briefings for selected stakeholders and information and feedback via the consultation website. Overall, those who responded gave no clear preference. However, the SCI notes that there was the least support for a partnership strategy and higher level of support for a direct delivery strategy.

5.29 **Fifth Consultation.** In May 2020, the Applicant carried out a consultation update on Site A, focusing on the design alterations for Site A in response to feedback in the Third Consultation. This was to balance the needs of both the local community and the Council, and to maintain the overall viability of the scheme. The architects have redesigned Site A, including the provision of more open space and a New Street Garden created between two residential blocks in Site A. This would offer more green space, better accessibility, and more daylight onto Church Street as a result.

5.30 The update also provided a new location for the library on Site A, with additional garden space. This meant the library would only have to move once from its location in Site B, removing the need for a temporary library within the development phasing schedule. The Options Consultation proposed that the library be moved from its current home on Site B to a temporary location, before moving to a permanent home in the new Community Hub planned for the other end of Church Street (as part of the Lisson Grove Programme). Feedback indicated that the community didn't support this approach.

5.31 The consultation was held via distributing newsletters across the ward, displaying a film explaining the changes available on the consultation website, stakeholder meetings, and a webinar. A total of 37 people provided feedback on the updated designs, and it was found that generally, the designs were well received. There was particular support for the location of the library, and the open space was seen as an improvement.

5.32 **Sixth Consultation.** The first stage of pre-planning public consultation was held between 3 March and 31 March 2021, outlining the proposals for Sites A, B, and C. 322 survey respondents participated, resulting in 1,438 survey contributions. 67% of the respondents chose phone as a way to participate, 14% by Freepost, 17% by online and 2% by door knock. This consultation discussed the proposals including new homes, the height of buildings, the character of buildings, shops and markets, health and wellbeing, library, open spaces, cycling, and public realm. Overall, 82% respondents are positive about the proposals, 12% neutral, and 6% negative. 78% of the respondents felt they were informed about the regeneration plans for Sites A, B, and C. Specifically, 80% of responses were positive to very positive about the proposals for

new homes with 90% of these responses emphasising the importance of keeping the design of new buildings in line with the local area.

5.33 **Final Consultation.** The second stage of the pre-planning public consultation was held between June 2021 and July 2021, presenting the feedback from sixth consultation and further exploring and developing the designs. After the consultation, the Applicant prepared to notify the community on the formal submission of the planning application. The SCI notes that there is very positive feedback about how the designs for the homes, market and green spaces were seen as modern and improvement for Church Street. The methods of this consultation included mailing consultation booklets to residents, distributing flyers advertising the consultation to addresses in the area, adverts on social media, including Twitter and the Church Street Facebook group, and posters distributed along Church Street, displayed at the Church Street regeneration office and on estate block noticeboards.

Consultation with the Local Planning Authority

5.34 The scheme has been developed as a result of extensive and collaborative pre-application discussions held with Officers at WCC. The Applicant entered into a Planning Performance Agreement ('PPA') with WCC to encourage co-operative working for a series of meetings required during the pre-application stage.

5.35 During the pre-application period, the project team has engaged with WCC Planning Officers comprehensively to shape the design of the Proposed Development. As set out in the table below, this included regular formal pre-application meetings that were structured with defined agendas and topics for discussion. This ensured that key aspects and principles of the design could evolve with full transparency and that any queries could be addressed efficiently.

5.36 A total of 20 pre-application meetings have been held with Officers since November 2018 through to submission. The Project Team engaged directly with Officers at WCC in relation to the emerging proposals, with discussions held with Planning, Design, Townscape, SUDS and Transport Officers.

5.37 The development proposals have evolved substantially since their first inception and a significant amount of work has been undertaken by the Project Team to address the comments made by WCC Officers at each stage of consultation. The pre-application meetings are summarised below:

Table 6: Summary of pre-application meetings with WCC officers

Topic	Pre-Application Meeting	Officers' Comments
Design	December 2018 to March 2021	Height Officers welcomed the introduction of greater variety to the height, massing and alignments to Sites A and C, which they considered to create relief and visual interest and a welcome design refinement. WCC noted that the proposed approach to massing is positive, and noted that the proposals for the façade were visually interesting.

Topic	Pre-Application Meeting	Officers' Comments
		<p>Layout The introduction of residential lobbies on and close to Church Street is welcomed by WCC Officers.</p>
Affordable housing	15 th May and 1 st March 2021	Officers generally supported the approach to affordable housing provision, subject to viability. Officers were satisfied with the 50% affordable housing offer.
Housing	February 2019 to March 2021	WCC Officers supported the revised proposed unit mix, the increase in dual aspect residential units on Site A to 100% and the proposal of recessed balconies.
Community uses	19 th March 2019 and 3 rd March 2020	<p>Officers were supportive of the proposed community space on Site B and commented that the community space as proposed was in a good location on site.</p> <p>They also welcomed the provision of the Library on Site A, they considered to provide a range of community functions.</p>
Non-residential uses	April 2019 to March 2021	<p>In terms of retail, Officers welcomed the omission of the covered market and instead proposed a strong line of enclosed commercial/retail activities and are broadly satisfied in principle with the proposed planning strategy to include the market in the Outline element of the hybrid planning application.</p> <p>In terms of enterprise space, Officers have raised no objection in land use terms to B1 uses on the ground floor frontages to the Enterprise Yard and Enterprise Street. The changes to the size and form of the 'Enterprise Yard' on Site A were considered acceptable by Officers.</p>
Daylight & sunlight	February 2019 to March 2021	<p>Officers noted that for a scheme of this scale, they can accept some daylight/sunlight losses given the strategic nature of the site.</p> <p>Following the update of the proposed massing, Officers were broadly satisfied with the update as they considered it as an improvement in terms of daylight and sunlight.</p>
Transportation & Parking	19 th March 2019 and 3 rd March 2020	Officers welcomed the updated route from market trader storage to Church Street Market, which is now through the building rather than via New Street Gardens.
Trees & Landscaping	15 th February 2019, 19 th March 2019, 15 th May 2019 and 3 rd March 2020	WCC Officers acknowledged that the Stockholm system for trees a positive for the Site as there are not many instances of this in London and welcomed the proposals to pedestrianise Church Street. They considered that the pedestrianisation proposal would be consistent with the placemaking aspirations for the Church Street area.

Consultation with the GLA

- 5.38 During the course of the pre-application stage, the Applicant has undertaken eight pre-application meetings with the GLA. These meetings included officers from Development Management, Enterprise and Environment, Energy, and Housing, Estate Regeneration and Area Manager. The principal conclusion of these meetings is that the GLA officers considered the proposals highly positive for the Sites in terms of reconfiguration of existing uses and redevelopment of existing buildings, the re-provision of affordable units is essential and the proposed height, scale and massing were acceptable.
- 5.39 The GLA pre-application meetings were held on 13th February 2019, 8th April 2020, 25th August 2021 and 1st September 2021. The key points of this meeting with GLA Officers are noted below:
- Officers noted that the civic centre building had been carefully designed to allow access through separate cores to address children's services function.
 - Officers indicated that as an estate regeneration scheme the GLA would seek re-provision of affordable units to target policy requirements.
 - Officers were keen to learn more about the adaptability of the proposed housing product over time to suit changing needs and tenures.
 - Officers were keen to confirm that the GLA would run options appraisals supported by viability analysis and that these would be conducted as transparently as possible.
 - Officers welcomed the progress on a number of design updates including the introduction of New Street Gardens, the alignment of the proposed blocks, and the multiple individual entrances to the residential units.
 - Officers generally support the proposed height and massing.
 - Officers welcomed the increase in dual aspect residential units on Site A to 100%. The GLA encouraged this aspiration for 100% dual aspect units across the entire Site.
 - Officers welcome equal access to communal amenity space throughout Site A.
 - The Applicant team note that 50% of the proposed homes will be affordable, and 34% of the net new homes will be affordable. The GLA noted their support for this provision.
 - Officers welcomed the provision of the Library on Site A, which provides a range of community functions.
 - Officers asked whether the existing and proposed library floorspace was the same, and noted that the function of the library was most important. The architects confirmed that the proposed library

floorspace, including library garden, was similar to the existing floorspace, and will provide a more efficient space to facilitate the variety of community functions.

- With regard to energy and sustainability, officers noted that passive measures for mitigating overheating should be maximised.
- A key comment throughout GLA engagement was ensuring a high level of public consultation was undertaken.

Designing Out Crime Meeting

5.40 On 3rd May 2019 and 20th November 2020, two meetings took place with the Designing Out Crime Officer at the Metropolitan Police Service with the aim of devising a design strategy to prevent crime. The Officer provided advice on how to ensure the design of the scheme is optimised to root out crime and which can be summarised as follows:

- It is encouraged the enterprise space courtyard on Site A uses an electronic gate at night time to prevent antisocial behaviour.
- Front gardens of residential units can be used for natural surveillance.
- It was suggested the playspace has to be in immediate view of residential units and in close proximity to front doors to increase natural surveillance. Officer encouraged it to be in the centre of the development.
- The Officer discouraged the use of walls outside properties and encouraged railings instead to prevent members of the public sitting on them, inflicting anti-social behaviour.
- It was encouraged to privatise spaces which give visual amenity and increase levels of control as when there is no direct control anti-social behaviour is encouraged.
- A number of management solutions were suggested for the delivery/servicing/storage entrances for market traders including encrypted fobs which can be restricted to certain times of day.
- The Officer welcomed the courtyard location of the market toilets whereby members of the public are restricted from entering.
- With regard to the library boundary between the public and private garden, the Officer welcomed increased landscaping to prevent challenges with different tenures.
- The Officer advised that the use of street lighting should be encouraged throughout the scheme.

6. The Proposed Development

- 6.1 The Church Street Estate Regeneration sets out to optimise the existing estate within the Church Street area, addressing the need to deliver new homes for the residents of City of Westminster, new community space for local communities of Church Street, new employment space for small and medium enterprises and market traders of Church Street and City of Westminster, and a newly-regenerated public realm that provides playspace for children and families and accessible routes for visitors in the Church Street area. There is an acute need for housing in the area, which the Proposed Development has considered through the course of the design development process. The Proposed Development has been brought forward as part of the ambition to deliver a great place or in tandem with a programme of community consultation.
- 6.2 The Proposed Development will secure numerous public benefits including improving the Site's condition for market traders in Church Street through improving natural connections and walking routes. The Proposed Development will seek to create high-quality outdoor space by carefully locating new well-designed public spaces, which will link up with surrounding existing public spaces.
- 6.3 Within the Site, the Proposed Development will provide a pedestrian-focused estate with new high-quality market, office floorspace, community floorspace, cafes/restaurant, and much-needed housing. The proposals would carefully design the access routes for cars and service vehicles to ensure the Site is easily accessible for pedestrians.
- 6.4 Around the Site, the Proposed Development will add activation through ground floor commercial uses on the busier Church Street, and creating a more residential frontage to the quieter Penfold Street, Broadley Street, and Boscobel Street. Spaces within the Site will be multifunctional and adaptable to the varying requirements of a mixed-use urban centre, allowing the ground floor to be 'active' and 'activated' to suit the needs of the shops and public uses within the lower floors.
- 6.5 New public spaces are distributed throughout the Proposed Development, with a varied character that responds to the environmental qualities of their position and the proposed use within.

The Vision

- 6.6 Providing good-quality homes can act as the bedrock of a thriving community. In this area of Westminster, the overarching aim in delivering an estate regeneration is to provide:
- long-term physical, economic and social sustainability; and
 - create a high-quality, sustainable mixed-use urban neighbourhood that is attractive to residents and visitors and integrates with the surrounding areas.
- 6.7 Estate regeneration is not merely about upgrading housing stock, but also about improving the overall quality of people's lives now and for future generations. This is particularly relevant to the existing community in the Church Street area. The vision is underpinned by Westminster City Council's ethos "City

for All” which has been identified as a key objective throughout the development of the scheme and as such this is the guiding principle for the Proposed Development.

6.8 The central aspiration is for the Church Street area to facilitate estate renewal and economic growth, while making fundamental and lasting difference to the lives of its residents, both current and future. WCC’s objectives for the Proposed Development are set out in the “City for All” Housing Renewal Strategy. The key objectives are as follows:

- building homes and celebrating neighbourhoods;
- a greener City;
- health and wellbeing;
- market and enterprise;
- making connections;
- improving existing assets; and
- building new homes of different tenures.

6.9 In addition to the above, it is WCC’s vision to transform the estate by providing a significant quantum of high-quality affordable housing and a significant uplift in publicly accessible open space, and making it a successful place for residents, visitors, workers, and businesspeople.

Overview of the Proposed Development

6.10 The Applicant seeks full and outline planning permission for the redevelopment of the Site comprising:

6.11 Site A (Detailed Element):

- The proposed demolition of all buildings on Site A;
- The erection of buildings, including tall buildings ranging up to 14 storeys, that could deliver up to:
 - 429 Residential Units (Use Class C3) or 36,302 sqm (GEA) of Residential Floorspace and ancillary residential facilities;
 - 541 sqm (GIA) of Community Floorspace (Use Class F1 and F2);
 - 711 sqm (GIA) of Commercial Floorspace (Use Class E); and
 - 2,102 sqm plant space (GIA) and 1,511 sqm (GIA) parking/deliveries hub.

- Alterations to the existing access road;
- Streets, open spaces, landscaping, and public realm;
- Car, motorcycle and bicycle parking spaces,, and servicing spaces;
- Market infrastructure and ancillary facilities; and
- Other works incidental to the proposed development.

6.12 Sites B & C (Outline Element):

- The proposed erection of buildings, including tall buildings ranging up to 12 storeys, and works of alteration to existing buildings that could deliver:
 - Up to 2,375 sqm (GIA) of flexible Commercial Floorspace (Use Class E);
 - Up to 459 sqm (GIA) of Community Floorspace (Use Class F1 and F2);
 - Up to 429 residential units or 66,698 sqm (GEA) of Residential Floorspace (Use Class C3);
 - Up to 174 sqm (GIA) of public house / wine / drinking establishment Floorspace (Use Class Sui Generis);
 - Up to 2,532 sqm (GIA) of Plant & Service; and
 - Up to 6,989 sqm (GIA) of Parking & Delivery Hubs.
- Alterations to the existing access road;
- Streets, open spaces, landscaping, and public realm;
- Car, motorcycle and bicycle parking spaces, and servicing spaces;
- Market infrastructure and ancillary facilities; and
- Other works incidental to the proposed development.

6.13 A more detailed description of the Proposed Development for Site A (Detailed) and Sites B and C (Outline) is set out below. The following paragraphs should be read in conjunction with the submitted plans and drawings and the DAS.

Site A

- 6.14 For the avoidance of doubt and as set out above, full planning permission is sought for Site A.
- 6.15 The Proposed Development for Site A will set the standard of high-quality, excellent design for Sites B and C, kick-starting the estate regeneration and building upon the existing vibrancy and mixed communities developed at the Site.

Demolition

- 6.16 As stated in the Site Context and Surrounding Chapter, Site A currently comprises a pub and Westminster Regeneration Base at ground floor and residential premises above. The Proposed Development will demolish all buildings located on Site A.

Site A Proposed Development

- 6.17 The Proposed Development for Site A consists of two buildings, referred to as A1 and A2, separated by a new pedestrianised street referred in this Planning Statement as 'New Street Gardens'. Each building is individually named the following:
- A1 – Located adjacent to Penfold Street, Broadley Street, and Church Street, neighbouring Site B.
 - A2 – Located adjacent to Church Street, Edgware Road, and Broadley Street.

Scale, Massing, Layout & Materials

Scale & Massing

- 6.18 Scale and massing have been considered across the three Sites to create a harmonious streetscape with a degree of variation and localised points of modest height where appropriate.
- 6.19 The heights on Site A are generally 9-11 storeys. On Church Street, the height is proposed to be 10 and 11 storeys reducing to 8 storeys on the Edgware Road frontage. The 10-storey elements have two-storey set-backs on the upper floors to reduce their impacts whilst the 8-storey element is significantly set back from Edgware Road so that the Edgware Road frontage is effectively 7 storeys. There is a localised point of height of 14 storeys on the corner of Broadley Street and Penfold Street adjacent to Broadley Gardens.

Layout

- 6.20 As noted above, Site A is split into two urban blocks, A1 and A2, separated by New Street Gardens. This pedestrianised street will deliver a stronger relationship with Venables Street and extends the existing urban structure of tertiary streets behind Edgware Road. The two separate urban blocks are closer in scale to the size, grain, and proportion of urban blocks within the local context.

- 6.21 The two separate urban blocks may be arranged as conventional perimeter blocks with a clear definition of public and private that successfully integrates the existing properties at 354-380 Edgware Road. Each block will be focused on a central communal garden. Further to this, the introduction of New Street Gardens provides a greater sense of openness and more natural light to be drawn into Church Street. The pedestrianised street will not be constrained by underground services and therefore presents an opportunity to introduce trees, planting, and Sustainable Drainage Systems, thereby making a positive contribution to the quantum of green open space in the local area.
- 6.22 The design of the ground floor of both urban blocks seek to distribute uses in a legible, rational, and efficient layout that compliments and reinforces adjacent uses whilst maximising the extent of active frontage. On the upper floors, flats are arranged in clusters of flats in a compact and efficient layout that maximises dual-aspect flats and the relationship to open space.
- 6.23 In terms of retail, retail floorspace will extend along the Church Street frontage and returns on the Edgware Road frontage. The retail use will present an active frontage to Church Street and Edgware Road and reinforces the existing adjacent uses.
- 6.24 In terms of the library, as noted above, a new library will be provided replacing the existing library located on Site B and relocated to a prominent and highly visible location on Church Street contributing to the mix of uses and activity on the street. The library will have access and views to a new library garden to the rear. This garden will be visible from the entrance on Church Street contributing to the perception of green open space. The library space is delivered over two floors, ground and mezzanine with a hierarchy of spaces ranging from the most public facing areas (adult and children's library) facing on to Church Street, with a flexible community space to the rear. The space will be designed with flexibility and adaptability in mind so that it can flex to changing needs, or indeed revert to other community functions, if required, in the future.
- 6.25 Residential duplex units extend along New Street Gardens, Broadley Street, and Penfold Street. This residential use responds to the existing uses adjacent and reinforces the residential character of the area around Church Street.
- 6.26 Communal entrances are located on the corners of the perimeter blocks accessed from New Street Gardens and Penfold Street and have equal value and quality regardless of tenure. Refuse and cycle stores are conveniently located in close proximity to communal entrances. In addition, these entrances will provide access to the communal gardens and entrance lobbies within Block A1 will have direct views of the communal garden.
- 6.27 Each block has a communal garden at its heart contributing to health and wellbeing, urban greening factor, biodiversity, and increasing the overall amount of green open space. Block A1 will have a communal garden on the ground floor and Block A2 will have a podium garden above the market infrastructure on the first floor.

Materials

- 6.28 Brick has been chosen as the predominant material. This is the dominant material in the local area and is a low maintenance, robust, attractive, modestly priced material that gives a strong sense of solidity and weathers well preserving a high quality appearance for the future. The brick will be in two colours; a red and a creamy-white, which echoes the use of red brick and creamy-white stucco on typical Westminster mansion blocks and also found in the adjacent frontage at 354-380 Edgware Road. In prominent locations brick patterns are introduced by using creamy-white bricks in areas of red brick, or by using a glazed creamy-white brick within areas of the typically matt creamy-white brick.
- 6.29 Within courtyards only the creamy-white brick will be used to maximise the light reflected and to enhance the quality of daylight within the courtyards.
- 6.30 On the lower floors in certain areas, such as around retail and communal entrances, a glazed red brick is used. This adds heightened visual interest and prominence to these areas as well as providing a more robust and easily maintainable finish. This is a similar approach to that found on the facades of Victorian pubs and Underground Stations such as the frontage to Edgware Road.
- 6.31 Metalwork including railings, balustrades, perforated metal screens, balcony fascias, balcony soffits, window frames, door frames, and rainwater goods will be colour coated either in an anodised or metallic powder coated finish.

Public Realm & Landscaping

- 6.32 The Proposed Development will provide key public realm areas in Site A, which comprises New Street Gardens, Ground Level Residents Communal Courtyard, and Upper Level Residents Communal
- 6.33 Courtyard. As noted above, the New Street Gardens will be a newly-developed pedestrianised street that separates two building blocks in Site A and includes a range of landscaping features that will enhance the visual quality of the public realm within the street. Furthermore, the New Street Gardens is a new area of public realm that is pedestrian dominated and located away from highways land.
- 6.34 A new garden at the library will be delivered, which will be known as the Library Garden. The access to this garden will be publicly managed.
- 6.35 In Block A1, two residents' communal courtyards will be provided at ground level and upper level.
- 6.36 In total, 2,478sqm of new public open space, which is approximately 15.4% of total proposed open space and 26% of the Site A total area, will be provided in the Proposed Development for Site A.
- 6.37 Site A consists of 3 distinct spaces. The Proposed Development will ensure these spaces are as green as possible with core entrances, private front gardens, playspaces, and seating areas. The ground level courtyard and library garden encased within building A1, which consists of secure communal play and seating spaces, private rear gardens, and a public managed library garden that attaches directly onto the new Church Street Library. And finally a podium level secure communal courtyard which uses the same principles as the ground level courtyard. All spaces are fully accessible and have been considered against play, urban greening factor, and amenity requirements.

Residential

6.38 A total of 429 residential units are proposed for Site A.

6.39 The Accommodation Schedule submitted as part of this planning application provides a full breakdown of the proposed mix and a summary is provided below, subject to ongoing viability and GLA grant funding discussions:

Table 7: Accommodation Schedule for the Detailed Component (Site A) Housing Mix

Unit Type	Market Sale (Inc. leaseholder reversion)		Social reversion		New social		New intermediate		Total	
	Units	% Split	Units	% Split	Units	% Split	Units	% Split	Units	% Split
1 Bed	113	53%	60	61%	12	26%	24	34%	209	49%
2 Bed	83	39%	16	16%	12	26%	27	39%	138	32%
3 Bed	19	9%	9	9%	21	46%	19	27%	68	16%
4 Bed	0	0%	11	11%	1	2%	0	0%	12	3%
5 Bed	0	0%	2	2%	0	0%	0	0%	2	0%
Total	215	100%	98	100%	46	100%	70	100%	429	100%

6.40 The buildings have been designed throughout to be tenure-blind, in terms of location, facility, and appearance to promote social cohesion between residents.

Private Amenity Space

6.41 Every flat will be provided with private amenity space in accordance with the London Housing Design Guide with sizes of 6sqm for 1-bed flats, 7sqm for 2-bed flats, and 8sqm for 3-bed flats. Amenity space has been designed with generous proportions and a minimum width of 1.5m that will accommodate a 4-person table and chairs. All recessed balconies have a single glazed fully openable bi-fold windows. The glazing gives a flexibility to have an open balcony or an enclosed winter garden, which will be protected from elements and therefore can be used all year round. This takes different forms depending on the location of the flat:

- Projecting balcony;
- Inset balcony;

- Private terrace; and
- Private garden.

Dual Aspect

6.42 Every flat has been designed to be dual aspect, which achieves 100% dual aspect. As a result of warming climate due to climate change, dual aspect will help to provide passive cooling in each dwelling providing a comfortable internal environment without reliance on mechanical methods. Moreover, dual aspect flats provide enhanced natural daylight and views which reduces the need for artificial lighting and improves residents' wellbeing.

Children Playspace

6.43 The Proposed Development will provide playspace areas within Site A that comprises 5,664 sqm across the whole Site. Both formal and informal playable spaces/areas will be inclusive in design, both in ability and age range.

Community Floorspace

6.44 The existing library currently located on Site B will be reprovided on Site A. The new library will be in a prominent location taking up the majority of the Church Street frontage of Block A1, highly visible on Church Street. The new library will be provided over two floors allowing for flexibility in use, future adaptability and benefitting from a high degree of visibility, ease of access as well as excellent daylight and views within the space. This is in contrast to the existing facility which is spread across three floors, two of which are basement floors. Being located on a single floor negates the need for stairs and lifts thereby allowing all of the space to be dedicated to library functions.

6.45 The new library will be designed as a bespoke facility to meet the needs of the local community, dovetailing with other community facilities and anticipating the way that library and community services are likely to be delivered in the future.

Commercial Floorspace

6.46 The proposed commercial floorspace will be delivered in Site A, comprising 711 sqm (GIA) under Use Class E. This allows a mix of uses within the Use Class E which will be subject to market demand at the time of implementation to ensure that the Proposed Development is viable and that an appropriate mix of activities are provided to support the local community.

Transport

6.47 The Proposed Development for Site A will include 47 new car parking spaces, including 4 market van parking spaces. In terms of residential parking spaces, 43 car parking spaces will be provided, of which 22 will be accessible for people with disabilities. These amount to circa 0.10 per residential unit.

6.48 The residential car parking spaces are to be provided within the basement of Site A and accessible via 2 car lifts situated on Penfold Street. Of the 43 parking spaces, 22 spaces will have active provision and the remaining 21 spaces will provide passive provision for future use.

6.49 With regard to cycle parking, the proposed cycle provision is illustrated below:

Table 8: Proposed Cycle Parking Provision

No. of Beds	Long Stay		Short Stay	
	Minimum Standards per Unit	Proposed Provision	Minimum Standards	Proposed Provision
Studio	1 space	11	1 space per 40 units	0
1	1.5 spaces	257		4
2	2 spaces	276		3
3	2 spaces	120		2
4	2 spaces	22		0
5	2 spaces	4		0
Total		690	Total	10

6.50 It is proposed that the cycle parking will be providing in mix of Sheffield stands, double stacker stands, accessible spaces, and cycle lockers for folding bikes.

Sustainability & Energy

6.51 An Energy Statement and Sustainability Appraisal have been prepared by and is submitted in support of this application.

6.52 With regard to sustainability, Site A proposals will:

- Apply the cooling hierarchy to minimise the risk of overheating via an ambient loop system;
- Restrict surface water discharge rates to 1.5-2.0l/s per connection to mitigate the risk of surface water flooding for all storms up to the 1 in 100 annual probability event plus allowance for 40% climate change;
- Aim to divert 95% of all demolition, construction and excavation waste from landfill to be reused and/or recycled;
- Maximise opportunities for amenity and biodiversity via careful soft landscaping, such as providing New Street Gardens;

- Provide a number of Sustainable Urban Drainage Systems ('SuDS') including self-infiltrating permeable surfaces, water butts, blue podium roof and below underground attenuation tanks;
- Achieve a Urban Greening Factor score of 0.437 for Site A;
- Optimising architectural measures, including orientation and site layout, natural ventilation and lighting, thermal mass and solar shading; and
- Maximise renewable energy via proposing central air source heat pumps and PV panels.

6.53 With regard to energy, Site A proposals will:

- Design the private public realm illuminance levels to meet the recommendations of BS 5489-1 and BS EN 13201-2, in line with the WCC Lighting Master Plan Document;
- Integrate solar PV panels;
- Utilise high-efficiency internal lighting that exceeds the minimum efficacy standards; in each residential unit, all fittings will be low-energy LED fittings;
- Each residential unit will have an individual Mechanical Ventilation with Heat Recovery (MVHR) system installed, which is a highly efficient approach in conjunction with very low air permeability;
- Maximise on-site renewable energy via roof mounted photovoltaic panels; and
- Supplying energy efficiently and cleanly by following the heating hierarchy of the London Plan in the Be Clean stage. This will involve a building level heat network designed to reduce distribution losses is proposed with provision to connect to a future area-wide district heating network.

Waste, Delivery & Servicing Strategy

6.54 With regard to delivery and storage facilities for Site A, 922sqm of delivery and storage facility (Use Class B8) for market traders will be provided in the Proposed Development.

6.55 Household waste arising from Site A will be collected twice a week by WCC, the approach has been agreed by WCC's waste team. The Facilities Management Team ('FMT'), for the private flats, will provide a highly managed service and will rotate bins within the bin stores on the basement levels to avoid overflowing bins. The bins will be transported between the basement levels to ground floor levels via a dedicated bin lift which operates from the bin stores directly into the appropriate holding store by the FMT. The FMT will be responsible for taking out and replacing the bins from the holding store to the collection point, at the agreed time of collection. For the affordable flats there will not be the same level of management, but the design will ensure they are as self-managed as possible.

- 6.56 The refuse collection strategy is in accordance with Westminster's Recycling and Waste Storage Guidance (2019). The waste storage for residential land use is based on the number of bedrooms per unit. Residential units within the development have been designed to incorporate appropriate spaces to enable a large proportion of the waste arising to be separated for recycling and as a result reducing the amount of waste requiring disposal.
- 6.57 Bins for general waste and communal recycling will be allocated for:
- Paper and Cardboard – 20l per bedroom.
 - Glass – 20l per bedroom.
 - Plastic/ Cans – 20l per bedroom.
 - General Waste – 30l per bedroom.
 - Food Waste – 10l per bedroom.
- 6.58 With respect to servicing, the servicing of the development will be designed to be safe, legal and efficient without creating any negative impacts on the local highway network, neighbouring businesses, local residents and the environment.
- 6.59 It is likely that a variety of vehicle types will visit the Site, which include:
- Motorcycles (couriers).
 - Cars and vans, up to 5.5 tonnes (Light Goods Vehicles (LGVs)).
 - Medium/ Heavy Goods Vehicles (HGVs) over 3.5 tonnes, including box vans and 10m rigid vehicles.
 - Large 3-axle refuse vehicles (9.86m).
- 6.60 Regular reviews of delivery and servicing vehicle activity will be held by the site management team and as part of the Framework Travel Plan. Any issues identified will be raised at the Steering Group meetings and dealt with accordingly through existing processes.
- 6.61 Additionally, to note the properties fronting Edgware Road comprise a mixture of commercial at ground floor and residential above, with primary points of access located along Edgware Road. However, the servicing for these properties is through the western part of Site A. The proposed development will alter the servicing of these properties to the existing Red-Route loading bays on Broadley Street and Edgware Road, as confirm within the accompanying Transport Assessment.

Sites B & C

6.62 Outline planning permission is sought for Sites B and C. As discussed in Chapter 1, a number of parameter plans and the Design Code provide the overall framework for future RMAs seeking approval of the appearance, layout, scale, landscaping and access of Sites B and C.

6.63 Full details of Sites B and C are set out below.

Demolition Works

6.64 The Outline Element will contain an entire demolition of Sites B and C, which includes the following:

Site B

- Eden House;
- Lea House;
- Ravensbourne House;
- Wandle House;
- Medway House;
- Library; and
- Roding House.

Site C

- Isis House;
- Derry House;
- Colne House;
- Mole House;
- Windrush House; and
- Darent House.

6.65 In addition to the demolition of existing residential units in Site A, the total proposed number of residential units to be demolished is 400.

Sites B and C – Proposed Development

6.66 Sites B and C will complete the Estate Regeneration of Church Street. These Sites seek to provide a range of town centre uses as well as a number of additional residential units.

6.67 In terms of principles for Sites B and C, these are set out below:

- Site B will comprise a single courtyard block with a mix of uses on the ground floor and residential on the floors above. Commercial and/or community spaces will provide an active frontage to Church Street with residential use providing an active frontage to Salisbury Street, Penfold Street, and the frontage addressing Broadley Gardens. Commercial and/or community uses on the ground floor on the corner of Salisbury Street and Broadley Gardens will complement this corner where the green spine meets Broadley Gardens.
- Site C will comprise a single courtyard block with a wing extending along Venables Street to Church Street. The building will have a mix of uses on the ground floor with residential on the floors above. A new open space will be created between the proposed building and Kennet House enhancing the setting of the existing building. The proposed building will introduce an active frontage of commercial use to Venables Street enhancing the quality of the pedestrian connection between Boscobel Street and Church Street.

Scale, Massing, Layout & Materials

Scale & Massing

6.68 Height and massing have been considered in relation to the impact on neighbouring buildings and public realm, maintaining good quality daylight to the new dwellings, the impact on existing heritage assets and the surrounding context whilst seeking to optimise the quantum of the development on a centrally-located urban site.

6.69 Localised points of height are proposed to act as visual markers to punctuate important public spaces and views. These are located on:

- The western corner of Site B on the corner of Church Street and Penfold Street (12 storeys); and
- The southern block of Site C addressing Church Street (13 storeys).

6.70 In Site C, heights have been reduced to 4 storeys along portions of Venables Street to reduce the daylight impact to neighbouring buildings on Edware Road.

Layout

6.71 Site B will comprise a single courtyard block with a mix of uses on the ground floor and residential on the floors above. Commercial and/or community spaces will provide an active frontage to Church Street with residential use providing an active to Salisbury Street, Penfold Street and the frontage addressing Broadley Gardens. Commercial and/or Broadley Gardens will complement this corner where the green spine meets Broadley Gardens.

6.72 Site C will comprise a single courtyard block with a wing extending along Venables Street to Church Street. The building will have a mix of uses on the ground floor with residential on the floors above. A new open space will be created between the proposed building and Kennet House enhancing the setting of the existing building. The proposed building will introduce an active frontage of commercial use to Venables Street enhancing the quality of the pedestrian connection between Boscobel Street and Church Street.

Materials

6.73 The accompanying Design Code defines the range of the materiality of the proposed blocks will be consistent with the typical materials found in the area and builds on the characteristics observed in the Site.

Public Realm & Landscaping

6.74 Regarding public realm, the aim is to provide an updated public realm for the Church Street Market that is more aesthetically pleasing, more easily cleanable and more fit for use by the market traders, and also maximise pedestrian and active travel priority, whilst maintaining ease of access for servicing and market set up and decant. The overall sense of place the market has created will be retained by discouraging gentrification.

6.75 With regard to planting, most of the planting is provided in raised planters to allow for necessary growing medium formation. Planting species being selected to be drought and shade-tolerant and provide flowering interest. Deciduous tree species have been used to minimise shading in the winter, and have been combined with herbaceous perennials to create a planting scheme that changes with seasons.

6.76 Lawn areas have been provided that interact with the adjacent path network and the design concept of raised planters. Flush access is provided onto the lawn areas which then raise up into raised planters so that trees can be planted within them.

Residential

6.77 The residential units across the Outline Element, Site B and C, is proposed to be split between market sale including leaseholder re-provision, social re-provision, social, and intermediate. Given the precise mix of units has yet to be fixed, a percentage split between unit types across the Outline Component has been identified. These will be determined at reserved matters stage and are set out below.

Table 9: Private Sale Mix across Outline Component

Unit Type	Percentage Range
1 Bed	40-50%
2 Bed	40– 50%
3 Bed	10 – 15%

Table 10: Intermediate across Outline Component

Unit Type	Percentage Range
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Planning Statement

Church Street Sites A, B and C



1 Bed	15 – 25%
2 Bed	35 – 45 %
3 Bed	25 – 45%

Private Amenity Space

6.78 Every residential unit will be provided with access to private amenity space, whether as a balcony, roof terrace, or garden space on the lower floors. All recessed balconies have a single glazed fully openable bi-fold windows. The glazing gives a flexibility to have an open balcony or an enclosed winter garden, which will be protected from elements and therefore can be used all year round. Where feasible and appropriate, residential units will have private amenity space that addresses the central communal gardens and/or a view of the central communal garden from their dwelling to enhance a sense of health and wellbeing. Private amenity space in each residential unit within Sites B and C will be provided in accordance with the London Housing Design Guide and Nationally Described Space Standards.

Dual Aspect

6.79 As set out in the Design Code, each residential unit will target dual aspect, where possible.

Child Playspace

6.80 The Proposed Development will provide playspace areas within Site B and C that adhere to London Plan Policy requirements. Both formal and informal playable spaces/areas will be inclusive in design, both in ability and age range.

Transport

6.81 Site B and C will deliver a minimum 3% accessible car parking per dwelling will be provided within any Site, with additional accessible car parking spaces provided through conversion of other space where demand necessitates in the future.

6.82 50% of residential spaces will have active electric vehicle charging, the remaining 50% to have passive electric vehicle charging. It is proposed that 100% active provision for electric charging will be provided for the van spaces.

6.83 The detailed design of Sites B and C have not been finalised yet but the detailed design will follow the principles laid out for Site A. The designs will incorporate policy compliant cycle parking, disabled vehicle parking and further facilities for the Church Street market.

Sustainability & Energy

Sustainability

- 6.84 With regard to sustainability, the surface water drainage strategy has been developed using best practice and utilising a combination of SuDS, including biodiverse green roofs, blue roofs, permeable/porous pavement and geo-cellular storage tanks.
- 6.85 The Proposed Development will include a number of ecological enhancement options to minimise any impacts on wildlife in the future, which include the inclusion of a commensurate number of bat boxes, a commensurate number of bird boxes, tree planting, creation of rain gardens and a commensurate number of invertebrate features, all of which will be determined at the reserved matters stage.
- 6.86 As noted above, the Proposed Development will also aim to divert 95% of all demolition, construction and excavation waste from landfill to be reused and/or recycled.
- 6.87 In terms of construction impacts, the contractor will follow responsible construction practices in reducing construction impact on the neighbours as well as the environment, by following the Considerate Construction Scheme and aspire for a 4-star or above rating.

Energy

- 6.88 As noted for Site A, Sites B and C will also design the private public realm illuminance levels to meet the recommendations of BS 5489-1 and BS EN 13201-2, in line with the WCC Lighting Master Plan Document.
- 6.89 The residential car parking spaces will be provided with active provision and passive provision for electric vehicle charging; the precise amount of provision will be determined at the reserved matters stage.
- 6.90 The Proposed development will utilise passive design measures including enhanced U-values and air tightness improvements, and active design measures including high efficiency lighting and efficient mechanical ventilation with heat recovery, to achieve a 30% improvement on Building Regulations from energy efficiency.
- 6.91 A communal heat network is proposed in order to future-proof the development for easy connection to an area-wide heat network should that exist in the future.
- 6.92 With regard to renewable energy, the technologies such as air source heat pumps will be utilised across the Proposed Development.

Waste, Delivery & Servicing Strategy

- 6.93 The waste, delivery and servicing for Sites B and C will be determined at reserved matters stage; however, the principles from Site A would be applicable in terms of site-wide management. This includes reducing the impact on the adjacent street scene, locating the plant and refuse spaces on the ground floor on secondary streets to minimise impact on retail frontage.

7. Summary of Regeneration Benefits

8.1 The proposals will provide a wide range of planning benefits for the Site and its surrounding area, as set out below:

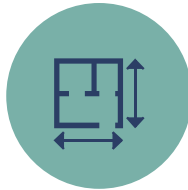
3.84 ha of renewal		Making best use of a brownfield Site for sustainable residential led mixed use regeneration
Optimising the potential of a previously developed site		Capturing the ambition of the NPPF
A development of high-quality design for Church Street		Achieving high-quality design through working with award-winning architects
Provision of up to 1,121 new homes		An indicative masterplan to guide the ongoing regeneration of the Site
Right of Return		Re-provision of existing affordable homes with uplift , allowing existing residents the right to return
50% affordable housing		Provision of the maximum reasonable appropriate level of affordable housing having regard to scheme viability. Re-provision of existing affordable homes
Achieving a range of unit sizes in both private and affordable units that meet local needs		Reconfiguring the layout of the existing residential floorspace to provide an optimised range of homes

Planning Statement

Church Street Sites A, B and C



Sustainable community fit for the future of the City of Westminster



Fulfilling National, Regional and Local requirements for **sustainable development**

Mixed and balanced community



Securing Church Street as a **mixed and balanced community** for the future

Non-residential uses



Providing flexible non-residential uses that are adaptable and respond to changes in local community need

Social and community space



Provision of a new community **library on Site A** and **provision for social and community infrastructure in the outline elements**

Enhanced market infrastructure



Providing enhanced infrastructure such as storage and van parking for market traders to flourish and opportunities for increased vibrancy and footfall

252 net additional construction jobs per year



Contributing to the **regeneration of City of Westminster**

£12,218 spending by residents per year



Provision of **new flexible commercial floorspace**

Circa £13m of CIL contributions



Appropriate **CIL Contributions to directly benefits Westminster residents**

Planning Statement

Church Street Sites A, B and C



A variety of financial benefits



Benefits to be secured through a **Section 106 Agreement**

Improved safety



Secured by Design principles are adopted in the design development of the proposals

High-quality public realm



Provision of high-quality **landscaped open space, private/communal amenity space** and **play space**

5,664 sqm of play space



Comprehensive play strategy across the Site

1,500 new cycle parking spaces



New cycle infrastructure including cycle storage and enhanced cycling routes

34% CO² emissions reduction



The use of **sustainable, emerging efficient building techniques** and **renewable technology**

8. Planning Policy Framework

Adopted Development Plan Documents

- 8.1 This section of the Planning Statement sets out the relevant adopted and emerging national, regional, and local planning policies pertinent to the Site and the Proposed Development.
- 8.2 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 8.3 The Development Plan applicable to the Proposed Development is as follows:
- *The London Plan (2021);*
 - *Westminster's City Plan 2019-2040 – Policies Map; and*
 - *City Plan 2019-2040 (2021).*
- 8.4 Under the above detailed Development Plan Documents, the Site is designated as follows:
- *Proposed District Energy Networks: Church Street;*
 - *District Centres: Church Street / Edgware Road;*
 - *Archaeological Priority Areas: Watling Street;*
 - *Housing Renewal Areas: Church Street / Edgware Road;*
 - *Nature Deficiency Areas: Maida Vale;*
 - *Air Quality Focus Areas: A5 Edgware Road from Avenue Hall / Marylebone / Seymour Street; and*
 - *Partly within the Central Activities Zone ('CAZ'): Ladbrokes Betting Shop.*

Planning Statement

Church Street Sites A, B and C

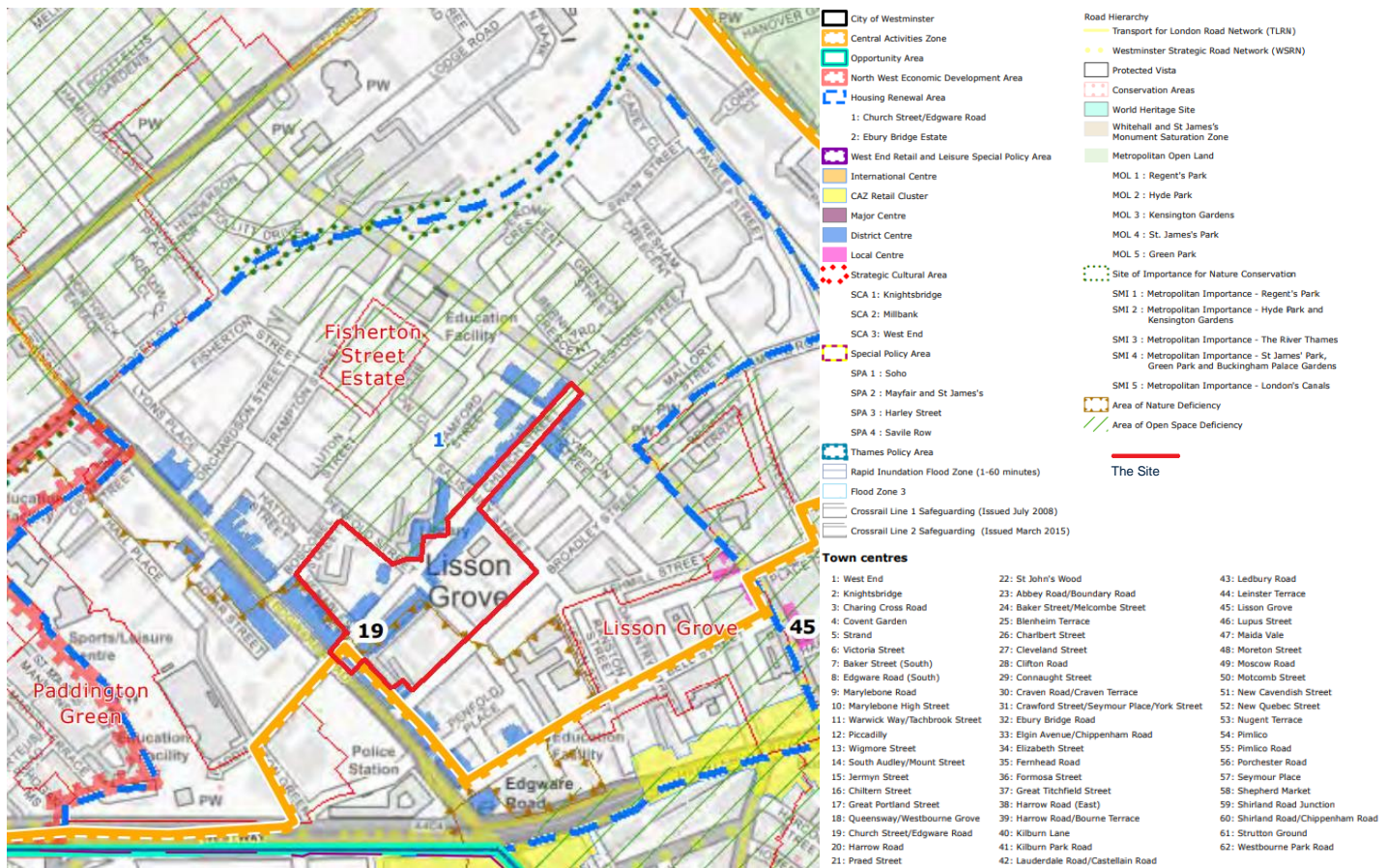


Figure 5: Adopted WCC Policies Map with the Site illustrated in red line

8.5 In addition to the above, there are a number of adopted guidance documents that also constitute a material consideration in the determination of the Proposed Development. The most relevant guidance documents in this instance comprises:

- *The National Planning Policy Framework (2021);*
- *Planning Practice Guidance;*
- *Better Homes for Local People – The Mayor’s Good Practice Guide to Estate Regeneration (2018);*
- *GLA Affordable Housing and Viability SPD (2017);*
- *GLA Housing SPD (2016);*
- *GLA Play & Informal Recreation SPG (2012);*
- *Church Street Masterplan (2017); and*
- *GLA Social Infrastructure SPG (2015).*

Emerging Development Plan Documents

8.6 There are a number of emerging Development Plan Documents and guidance documents that should also be considered. These are as follows:

- WCC Draft Environmental Supplementary Planning Document (May 2021)

The draft SPD builds upon environmental policy within the City Plan 2019-2040. This SPD will not introduce new planning policies into the development plan, it is however, a material planning consideration. The purpose of this SPD is to explain the shift in the Council's narrative on the environment and the uplift in the standards the Council expects developers to adhere to. The key topics of this SPD include sustainable retrofitting of historic properties, protection of tranquil spaces from noise pollution, climate change, and carbon neutrality. The consultation began on 17th May 2021 and ended on 28th June 2021.

- The Planning for the Future White Paper (August 2020)

The Planning for the Future White Paper represents a comprehensive reform of England's planning system. The White Paper aims to streamline and modernise the planning process, improve outcomes on design and sustainability, and reform developer contributions and ensure more land is available for development where it is needed. The consultation on proposals for reform of the planning system in England took place between 6 August 2020 and 29 October 2020. If the proposals in the white paper are adopted, there would be a new spatial zoning system in place to give more clarity to what type of development is acceptable in a given area and a simplified formula for assessing housing need for local authorities. However, the proposals are still at early consultation stage and therefore have no material bearing on the proposals in this application.

- GLA Emerging Guidance:

There are nine GLA documents currently out for consultation, which includes Good Quality Homes for All Londoners, Public London Charter, Circular Economy Statements, Whole Life-Cycle Carbon Assessments, Be Seen Energy Monitoring Guidance, Air Quality Positive Guidance, Draft Fire Safety Guidance, Transport Land Guidance, and Urban Greening Factor Guidance. All except for Air Quality Positive Guidance, Draft Fire Safety Guidance, Transport Land Guidance and Urban Greening Factor Guidance have been consulted upon from October 2020 to January 2021 and a consultation summary document is anticipated to be published alongside the final guidance in summer 2021. Air Quality Positive Guidance, Draft Fire Safety Guidance, Transport Land Guidance, and Urban Greening Factor Guidance will be consulted upon in summer 2021. All of these draft documents carry little weight as they are currently at an early-stage consultation period and not finalised yet for adoption.

8.7 Planning policies pertinent to the proposals as contained within adopted planning policy document and where relevant emerging planning policy documents are discussed in the next Chapter.

9. Key Planning Considerations

9.1 This Chapter of the Statement assesses the Hybrid Planning Application proposals against the previously identified planning policy framework for the Site, having regard to the material considerations including the specific circumstances of the Site. Consideration is given to the following key topics:

- Principle of Redevelopment
- Residential Use
 - Replacement of Existing Housing
 - Affordable Housing
 - Affordable Housing Tenure
 - Housing Quality & Amenity
 - Dwelling Mix
 - Unit Size
 - Building Cores
 - Dual Aspect
 - Amenity Space
 - Inclusivity
- Class E Floorspace
 - Consolidation of Existing Class E 'Retail' Floorspace
 - Proposed Class E Floorspace
- Church Street Market Infrastructure
- Social and Community Infrastructure
- Density
- Design
 - Components of Good Design
 - Layout & Form
 - Elevations
- Tall Buildings
- Built Heritage, Townscape & Visual Impact Assessment
- Public Realm & Urban Greening
 - Public Realm
 - Healthy Streets
 - Play Space
 - Biodiversity & Ecology
 - Urban Greening Factor
- Transport
 - Access, Circulation & Highways
 - Car Parking
 - Cycle Parking
 - Servicing & Deliveries
 - Network Impacts
- Climate Change, Energy & Sustainability
 - Heat, Energy & Carbon Emissions

- Overheating
- Sustainability
- Circular Economy & Whole-Life Carbon Assessment
- Other Environmental Matters
 - Air Quality
 - Noise Vibration
 - Wind & Microclimate
 - Daylight & Sunlight
 - Flood Risk & Drainage
 - Fire Safety
 - Archaeology
 - Equality

Principle of Redevelopment

- 9.2 London's population is projected to increase by 70,000 every year, reaching 10.8 million by 2041. This means that in order to accommodate demand, London needs to build 10,000 new homes, along with new jobs every year to accommodate this demand, as set out within the London Plan (2021). The Site is also one of five priority housing estates identified in the Westminster Housing Renewal Strategy (2010). This designation within the Church Street / Edgware Road Housing Renewal Area in the City Plan (2021), in combination with the above detailed increasing demand for new homes and jobs, clearly underpins the need to optimise development on sustainable brownfield sites such as this.
- 9.3 The NPPF (2021) encourages growth through the principles of sustainable development. It emphasises the importance of making effective use of land, particularly brownfield land where the land is underutilised. It encourages development plans to optimise the use of land in their area and meet as much of the identified need for housing as possible. A significant uplift in the average density of residential development within these areas should be sought, subject to planning considerations.
- 9.4 Additionally, the NPPF recognises the social, economic and environmental benefits of estate regeneration and encourages local planning authorities to use their planning powers to help deliver estate regeneration to a high standard.
- 9.5 Policy H1 of the London Plan (2021) seeks to increase the supply of housing in the capital and sets WCC a 10 year housing target of 9,850 homes. Policy GG2 aligns with this target through creating successful sustainable mixed-use places that make the best use of land. Noting those involved in planning and development must proactively explore the potential to intensify the use of land 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.
- 9.6 Building on this, Policy H8 specifically raises the opportunities that the redevelopment of existing housing estates can deliver and welcomes interventions that enhance existing housing estates. The accompanying Mayor's Good Practice Guide to Estate Regeneration (2018) echoes this and adds that there is no 'one size fits all' approach for estate regeneration.

- 9.7 Policies 8 and 9 within the City Plan (2021) are geared towards encouraging more housing, optimising housing delivery sites and finding new innovative ways to deliver more homes. Through this approach, there is an expectation that the London Plan derived target of 20,685 homes across the plan period (2019-2040) will be exceeded.
- 9.8 Policy 6 sets out that the Church Street / Edgware Road Housing Renewal Area is a spatial development priority with the aim to bring about much needed housing growth in the form of at least 2,000 high quality new homes, as well as providing at least 350 new jobs, community facilities, new green infrastructure and public realm improvements, enhancements to the District Centre, including improved facilities for Church Street Market, improved mobility infrastructure, and innovative and high-quality design to ensure the most efficient use of land, including tall buildings.
- 9.9 This Hybrid Planning Application seeks to redevelop Church Street Estate to deliver a new sustainable and resilient place, providing a significant quantum of new high quality housing, new community facilities, high quality public realm, and jobs.
- 9.10 Following extensive consultation, alongside considerable support from the existing residents, local community and surrounding stakeholders, WCC and GLA Officers have also indicated their support for the principle of redevelopment and large-scale renewal of the Site. This is due to its proposed boost to housing supply, improvements to the quality of homes, the provision of new retail accommodation and community facilities and the provision of enhanced public realm for residents.
- 9.11 Accordingly, the Proposed Development is strongly supported by national, regional and local policy objectives, and specifically meets the aims of Policy 6 of the City Plan in the redevelopment of the Church Street / Edgware Road Housing Renewal Area.

Residential Use

- 9.12 The planning system (at its broadest level) recognises the scarcity of land in the UK and therefore seeks to optimise the development potential of all sites, particularly those that are accessible by a range of means of transport and that have been previously developed.
- 9.13 Paragraph 119 of the NPPF reiterates this by stating that planning decisions should promote the effective use of land in meeting housing need and other uses in a way which makes an effective use of previously developed or brownfield land.
- 9.14 London Plan Policy H1 seeks to increase the supply of housing across London and sets a ten-year housing target for WCC at 9,850 homes, equating to 985 new homes per year. Policy H1 emphasizes the importance of making best use of land and optimising density, especially those that are very well connected, and are surplus public sector owned sites.
- 9.15 City Plan Policy 8 seeks to increase the supply of good quality housing to meet Westminster's housing target. The City Plan sets a target so that 1,495 new homes are delivered each year. Policy notes that two of the strategies for achieving this target are through optimising site densities in Housing Renewal Areas and through planning positively for tall buildings in appropriate locations.

- 9.16 The Proposed Development would deliver a significant number of new homes. Specifically, it will deliver 423 new homes in Site A in the detailed element and up to 698 new homes for Site B and C in the outline element. The total number of new homes that the Proposed Development could deliver is up to 1,121. This is a significant number that can assist in contributing to meeting the increasingly challenging housing delivery targets facing the City of Westminster.
- 9.17 The Site is located within the Church Street / Edgware Road Housing Renewal Area set to deliver up to 2,000 new homes. The Site is brownfield, well connected, and therefore a sustainable location for high density residential development. The Site has existing residential use on Site. As such, the principle of delivering homes in this location is accepted and supported at national level, in accordance with the NPPF, London Plan Policy H1 and City Plan Policy 8.

Replacement of existing housing

- 9.18 The NPPF states that planning policies and decisions should consider the social, economic, and environmental benefits of estate regeneration. Further to this, it encourages Local Planning Authorities ('LPA') to use their planning powers to help deliver estate regeneration to a high standard.
- 9.19 In the case of loss of existing housing, London Plan Policy H8 Part A calls for the replacement by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Focusing on estate redevelopment, Part C specifically states that before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider alternative options first. The potential benefits of demolition and rebuilding homes of homes should be balanced against the wider social and environmental impacts. The availability of Mayoral funding and any conditions attached to that funding should be considered. Further to this, Paragraph 4.8.3 notes that estate regeneration schemes often comprise a range of physical interventions that may be required to support the delivery of the estate regeneration which includes repairs to, and refurbishment of, existing homes; building new homes on 'infill' sites; and demolition and redevelopment. In the Good Practice Guide, the Mayor is clear that when considering options to deliver estate regeneration schemes, boroughs, housing associations and their partners should "*always consider alternative options to demolition first*".
- 9.20 The Mayor's Good Practice Guide to Estate Regeneration adds that where the demolition of affordable homes is considered to be the best option and GLA funding is being pursued, then a ballot must be carried out where existing residents have the opportunity to have their say on the proposal. Although in this respect, the Secretary of State ('SoS') Cover Letter issued to the Mayor on 13th March 2021 setting out his considerations of the London Plan should be noted – with particular reference to the SoS's view on ballots as an "*onerous condition*" of estate regeneration schemes.
- 9.21 Part D of the London Plan Policy H8 states that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either

social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.

- 9.22 Part E of Policy H8 adds that demolition and replacement of affordable housing should follow the Viability Tested Route.
- 9.23 With regard to the City Plan, Policy 9 states that there will be no net loss of affordable housing across the City. Part H of this policy states that proposals involving the demolition of existing affordable housing will not be permitted unless it is replaced by at least an equivalent amount of affordable housing floorspace.
- 9.24 The existing Site comprises 400 residential units (30,661sqm GIA floorspace), of this, 230 of the units are within the affordable tenure (12,800sqm GIA floorspace). Focusing on Site A, there are 145 existing units (13,467sqm GIA floorspace) and 98 are within affordable tenure (9,336sqm GIA floorspace). All residential units are to be demolished as part of the Proposed Development, with Site A leading the first phase.
- 9.25 The Proposed Development seeks to significantly uplift the quantum of housing on the Site, with up to 1,121 new high quality residential units, including 429 units as part of Site A. In floorspace terms, this equates up to 103,000 sqm GEA in residential floorspace, and 36,302 sqm GIA is proposed for Site A. The proposals therefore deliver the replacement of existing housing, and a significant uplift in residential floorspace, in accordance with London Plan Policy H8 Part A.
- 9.26 Extensive consultation has taken place with the local community, as well as a variety of key stakeholders in relation to the proposed estate regeneration for nearly 10 years. A resident's ballot has been carried out in 2013, which sought to obtain feedback on the scheme from the local community. However, as noted in paragraph 5.7 of this document, the majority of people backed the development of a scheme at the time it was ultimately considered not financially viable to proceed and a decision was taken to develop the Church Street Masterplan. The Applicant has adopted a long-term engagement model instead of ballots to better gauge support for the scheme. The Applicant in 2019 undertook a years' worth of consultation discussing four different potential options from initial refurbishment to full redevelopment. Following this consultation, in partnership with the local community it was decided the Site would be full redevelopment excluding Kennet House. Consultation has continued beyond this to ensure all possible development routes are explored and the community are regularly informed of this process. Further information is set out in the Statement of Community Involvement.
- 9.27 The benefits of the Site undergoing an estate regeneration are significant in providing high quality residential living, with 100% dual aspect and private external amenity space. The proposals will also provide new community floorspace in the form of a library on Site A, new flexible commercial units providing active frontages at street level, public realm in the form of New Street, play space and significant urban greening. Accordingly, the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts are great. With regard to the availability of Mayoral funding and any conditions attached to that funding, the Applicant is undergoing discussions with the GLA in regard to viability discussions, as such the Proposed Development aligns with London Plan Policy H8 Part C.
- 9.28 Focusing on Part D of the London Plan Policy H8 and City Plan Policy 9, the existing affordable residential floorspace on Site is 12,800sqm GIA and the Proposed Development seeks to provide up to 48,826sqm

of affordable residential floorspace. In conclusion, the proposals will not only be a like-for-like replacement of affordable housing but also make a significant uplift to the WCC's affordable housing stock.

- 9.29 As demonstrated within the accompanying accommodation schedule the existing 98 social rent tenure located in Site A will be reprovided as part of the detailed element of the Proposed Development. The accompanying indicative masterplan accommodation schedule for the outline elements (Sites B and C) demonstrates all existing social rent are to be reprovided, in accordance with London Plan Policy H8 Part D.
- 9.30 Accompanying this Application is an Estate Regeneration Statement that states that all current secure tenants and residential leaseholders (who have lived in their home for more than one year) will have the full right to return to a new home on the Site. They will be offered a new home, under the same tenancy terms they currently have and reasonable moving costs will be reimbursed by the Applicant, such as removal costs, disconnection costs and redirection of mail. These residents are also entitled to receive a statutory home loss payment and will have the option to move away from Church Street if they choose to, in accordance with the Mayor's SPD and London Plan Policy H8 Part D.
- 9.31 With regard to ensuring the replacement affordable housing is integrated into the scheme to ensure mixed and inclusive communities, the proposed buildings have been designed throughout to be tenure-blind, in terms of location, facility and appearance, to ensure equality between residents.
- 9.32 Finally, accompanying this Application is a Financial Viability Assessment to support the viability discussions in accordance with London Plan Policy H8 Part E.
- 9.33 As set out above, all existing homes will be re-provided, and there will be a significant uplift in new homes, and new affordable homes along with substantial public benefits including new public realm and community infrastructure. The proposals have been brought forward following significant public consultation with residents, in accordance with the Mayor's SPD, therefore, meeting the requirements of London Plan Policy H8 and City Plan Policy.

Affordable Housing

- 9.34 Paragraph 62 of the NPPF states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required. Policy H4 Part A of the London Plan and the Mayor's Affordable Housing and Viability SPG sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include public sector land delivering at least 50% affordable housing on each site.
- 9.35 Policy H8 Part E requires developments that include the demolition and replacement of affordable housing to provide the maximum possible amount of affordable housing to be determined through viability testing.
- 9.36 With regard to the City Plan, Policy 9 states that at least 35% of all new homes will be affordable across Westminster. Part H of this policy states that additional affordable housing will be maximised in redevelopment proposals involving the demolition of existing affordable housing.

- 9.37 Paragraph 9.3 of the City Plan notes that estate regeneration scheme should maximise the amount of affordable housing and deliver 50% affordable housing on public land where viable, taking account of any affordable housing that has been re-provided.
- 9.38 The Proposed Development seeks to deliver 50% affordable housing via habitable rooms across the Illustrative Masterplan (Site A, B, and C), subject to viability discussions with the GLA.
- 9.39 It is proposed that Site A would comprise 214 affordable residential units. This would equate to a 50% affordable housing offer as part of Site A via Habitable Rooms, and 50% when calculated on a unit basis. This would also include the re-provision of 98 social rented units. Accordingly, the proposed quantum complies with London Plan Policy H8 Part E and City Plan Policy 9.
- 9.40 In Site B and C (outline elements) the affordable housing offer is dependent on the number of units and habitable rooms coming forward at reserved matters stage. However, it is envisaged that the later Phases will also deliver 50% affordable housing.
- 9.41 Overall, the indicative masterplan could deliver up to 554 affordable units, equating to a 50% affordable housing offer. Thus delivering the targeted amount of affordable housing for a public land, estate regeneration scheme in accordance with Policy H8 Part E of the London Plan and Policy 9 of the City Plan.

Affordable Housing Tenure

- 9.42 Focusing on affordable housing tenure, London Plan Policy H6 sets out that the following tenure split of affordable housing should be:
- A minimum of 30% low-cost rented homes, as either London Affordable Rent or Social Rent;
 - A minimum of 30% intermediate homes, including London Living Rent and London Shared Ownership; and
 - The remaining 40% to be determined by the borough as low-cost rented homes or intermediate homes.
- 9.43 Policy 9 of the City Plan seeks a tenure mix of 60% as intermediate affordable housing for rent or sale across a range of income levels and 40% as be social rent or London Affordable Rent.
- 9.44 The proposed quantum of affordable housing in Site A, comprises 98 units are social re-provision, 46 new social rent and 70 units are intermediate products. When focusing on the new affordable housing proposed this equates to a split of 39.7% new social rent and 60.3% new intermediate. This proposed tenure split accords with London Plan Policy H6 and City Plan Policy 9.
- 9.45 The outline elements (Site B and C) of the Proposed Development, aims to deliver the proposed tenure split of Site A of 40% new social rent and 60% new intermediate, in accordance with the above mentioned policies. However, to note the Proposed Development are also re-providing a significant number of units

for affordable re-provision that will impact the affordable housing tenure breakdown when the outline elements are brought forward at RMA.

9.46 On this basis the Proposed Development offers a significant contribution of affordable housing in the City of Westminster, in a location with excellent transportation accessibility, an established Central London area and existing community, in accordance with London Plan Policy H4 and Policy 9 of the City Plan.

Housing Quality & Amenity

9.47 The NPPF Paragraph 12 identifies good design as a key aspect of sustainable development, stating that ‘the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve’.

9.48 London Plan Policy D6 and the Mayor’s Housing SPG (2016) provides standards for proposed accommodation, such as size, daylight, and private external amenity space.

9.49 Policy 7 of the City Plan seeks to protect and where appropriate enhance amenity, by preventing unacceptable impacts in terms of daylight and sunlight, sense of enclosure, overshadowing, privacy, and overlooking.

9.50 Policy 12 seeks to ensure that all new homes provide a well-designed, energy efficient, and high-quality living environment.

9.51 Site A of the Proposed Development will deliver high quality residential units to accommodate a range of family sizes and people. Site A residential quality and amenity has been assessed by WCC as part of pre-application advice discussions and considered acceptable.

9.52 The table below provides an assessment of Site A of the Proposed Development against London Plan Policy D6, which is considered to contain the most detailed guidance in relation to residential standards and requirements:

Table 11: Assessment against London Plan Policy D6

London Plan Policy D6	Site A Proposed Development
<p>A) <i>Housing development should be of high quality design and provide adequately-sized rooms and with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.</i></p>	<p>The accompanying DAS sets out the typical proposed homes. All homes have been designed in compliance with the Nationally Described Space Standards (NDSS)</p> <p>The proposed residential units have been designed throughout to be tenure blind, in terms of location, facility and appearance, to ensure equality between residents</p>
<p>B) <i>Qualitative aspects of a development are key to ensuring successful sustainable housing.</i></p>	<p>This Application is also supported by a Sustainability Statement which assesses the proposed residential development for sustainability. The Statement concludes that the</p>

	<p>proposed homes are energy efficient low carbon new homes that can adapt and respond to climate change.</p>
<p>C) <i>Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution.</i></p>	<p>The proposed development for Site A achieves 100% dual aspect units. For the outline elements the Design Code also promotes the maximum provision of dual aspect homes.</p>
<p>D) <i>Provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.</i></p>	<p>Accompanying this Hybrid Planning Application is the Daylight / Sunlight and Overshadowing Assessment, which assess the proposed development for existing and proposed residents daylight and sunlight conditions.</p> <p>An Overheating Assessment also accompanies the Application as part of the Energy Statement which assesses the Proposed Development. In summary the assessment found that the proposed dwellings in Phase 1 would not be at unacceptable risk of overheating subject to design and mitigation measures which have been incorporated within the proposal, along with occupier management of ventilation.</p> <p>Each dwelling is provided with a private balcony in line with the area standards set out in the London Plan. In addition, all recessed balconies have a single glazed fully openable bi-fold windows. The glazing gives a flexibility to have an open balcony or an enclosed winter garden, which will be protected from elements and therefore can be used all year round, which accords with this policy.</p>
<p>E) <i>Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals glass) and food waste as well as residual waste</i></p>	<p>Residential waste storage is provided within each block on the ground floor of the Proposed Development. The refuse store for the residential units will be locked and only accessible by residents and the FMT; each storage area has been designed to incorporate the design requirements as set out in the relevant guidance documents.</p> <p>In accordance with the requirements set by WCC, bins for general waste and commingles recycling will be allocated for:</p> <ul style="list-style-type: none"> ■ Paper and Cardboard – 20l per bedroom. ■ Glass – 20l per bedroom.

Planning Statement

Church Street Sites A, B and C



	<ul style="list-style-type: none"> ■ Plastic/ Cans – 20l per bedroom. ■ General Waste – 30l per bedroom. ■ Food Waste – 10l per bedroom. <p>All bin stores are sized to allow for space for management and relocation of the bins themselves.</p>
F) <i>Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained:</i>	The Proposed Development aligns with Part F and the answers set out below:
1. <i>Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.</i>	<p>All homes have been designed in compliance with the Nationally Described Space Standards (NDSS), which accords with London Plan Table 3.1</p> <p>All proposed dwellings contain built in storage areas regardless of size.</p>
2. <i>A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.</i>	As illustrated within 1 DAS, the proposed 2 bed / 4 person dwellings provides two double bedroom rooms.
3. <i>A one bedspace single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide.</i>	The proposed residential units have been designed in accordance with technical design standards, thus can accommodate range of bedroom sizes.
4. <i>A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sqm.</i>	The proposed residential units have been designed in accordance with technical design standards, thus can accommodate range of bedroom sizes.
5. <i>Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sqm within the Gross Internal Area).</i>	The Applicant agrees to Point 5 – 7. This has been demonstrated within the submitted DAS and Site A drawings.
6. <i>Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.</i>	
7. <i>A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sqm in a double bedroom and 0.36 sqm in a single bedroom counts towards the built-in storage requirement.</i>	

<p>8. <i>The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.</i></p>	<p>All flats in Site A will benefit from generous floor to ceiling heights with a minimum of 2.6m height in living rooms and bedrooms, and 2.4m in kitchens, bathrooms and hallways to accommodate the additional services required, as such exceed the 75% requirement.</p>
<p>9. <i>Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1</i></p>	<p>Each dwelling is provided with a private balcony in line with the area standards of 5sqm per 1-2 person dwellings and an extra 1sqm for each additional occupant.</p>

Dwelling Mix

- 9.53 London Plan Policy H1 states that proposed residential developments should offer choice in a range of units and types and should reflect the needs of the Borough.
- 9.54 London Plan Policy H10 states that schemes should generally consist of a range of unit sizes. The policy continues that in order to determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, decision makers should have regard to the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or a station or with higher public transport access and connectivity.
- 9.55 Whilst the City Plan does not set a specific dwelling mix, Policy 10 requires 25% of all new homes across Westminster will be family sized. City Plan also states that the majority of two bedroom units within a single development should be large enough to accommodate two double bedrooms.
- 9.56 The unit mix of Site A is defined by social reprovision, market sale, and affordable tenures as detailed below:

Table 12: Proposed Unit Mix for Site A (Detailed)

Site A	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Market Sale	113	83	19	0	0	215
Social Reprovision	60	16	9	11	2	98
New Social	12	12	21	1	0	46
New Intermediate	24	27	19	0	0	70
Total	209	138	68	12	2	429

- 9.57 As demonstrated above, the proposed unit mix shows a range of unit sizes. The proposed unit mix has been developed in accordance with WCC 2019 Annual Affordable Housing Statement. Whilst also taking into consideration the re-provision of existing leaseholders and social rented units, in accordance with London Plan Policy H1.
- 9.58 As previously stated, the Site is located within a Central London location with excellent public transport accessibility, as such the proposed higher volume of 1 and 2 bedroom units are appropriate to its location, in accordance with London Plan Policy H10.
- 9.59 In accordance with the City Plan's definition of family housing (3 bedroom or larger and including 2 bedroom 4 person units for affordable housing), Site A proposes to deliver 25.4% family housing, meeting the requirements of City Plan Policy 10.
- 9.60 Out of the 138 2 bedroom units proposed, 93 of the units will be 2 bedroom 4 person size in accordance with the City Plan requirements.
- 9.61 Site B and C of the Proposed Development has set the following minimum and maximum percentages:

Table 13: Private Sale Mix across Outline Element

Unit Type	Percentage Range
1 Bed	40-50%
2 Bed	40– 50%
3 Bed	10 – 15%

Table 14: Intermediate across Outline Component

Unit Type	Percentage Range
1 Bed	15– 25%
2 Bed	35 – 45%
3 Bed	25 – 45%

- 9.62 As noted earlier, the proposed unit mix has not been confirmed for the later phases (Site B and C) due to the phases being in outline and will therefore be confirmed at RMA stage. However, the Illustrative Masterplan has suggested the following unit mix for the Proposed Development, taking into consideration the re-provision requirements of each phase.

Table 15: Illustrative Masterplan (Sites A, B and C) Unit Mix

Unit Type	Market		Affordable Housing		Social Reprovision		Total Units	
	Units	% Split	Units	% Split	Units	% Split	Units	% Split
1 bed	268	47%	109	33%	134	59%	511	46%
2 bed	242	43%	150	46%	42	18%	434	39%
3 bed	57	10%	64	20%	39	17%	160	14%
4 bed	0	0%	3	1%	11	5%	14	1%
5 bed	0	0%	0	0%	2	1%	2	0%
Total	567	100%	326	100%	228	100%	1,121	100%

9.63 Following pre-application advice discussions, WCC Planning Officers advised the proposed unit mix for the indicative masterplan social units would not quite meet the statements' requirements. However, it is recognised that the Proposed Development is providing in excess of what it is required to in terms of the quantum of affordable units (i.e. 50%), meets the 60/40 split and is also constrained by its re-provision requirements. On this basis, WCC Planning Officers advised they can broadly support the tenure type and mix despite it not quite meeting the requirement for the new social units.

Unit Sizes

9.64 The NPPF sets out that the size of housing needed for different groups in the community should be assessed and reflected in the planning policies.

9.65 Policy D6 of the London Plan promote quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. Policy D6 requires all new homes to meet the standards set out in the Technical Design Standards. Policy 12 of the City Plan requires all new C3 homes to meet or exceed the Nationally Described Space Standards.

9.66 The accompanying detailed plans for Site A and Design Code for the outline elements confirms and includes a requirement that all units will meet the minimum national space standards.

Building Cores

9.67 The Standard 12 of the Mayor's Housing SPG (2016) requires that residential cores should be accessible to generally no more than eight units on each floor. In regard to Site A, the proposed drawings demonstrate the proposed building layouts for upper level residential floors will have no more than eight flats per core on a typical floor. The Design Code for the outline elements adheres to this standard. Therefore, the standard is met in this regard.

Internal Daylight & Sunlight to Proposed Dwellings

9.68 As stated above, internal daylight and sunlight to dwellings are emphasised in London Plan Policy and WCC City Plan paragraph 7.3. The WCC City Plan seeks to ensure that the provision of indoor daylight and sunlight levels is adequate to support health and wellbeing and to decrease energy consumption through reduced need for artificial heating and lighting.

9.69 Regarding the Illustrative Masterplan, the height and massing have been carefully designed to maintain good-quality daylight to the new dwellings. In Site A, the ceiling heights of residential units have been designed to be at least 2.6m height in living rooms and bedrooms and 2.4m in kitchens, bathrooms, and hallways to provide acceptable levels of daylight and sunlight to these rooms.

9.70 Finally, accompanying this application is a Daylight & Sunlight Assessment which provides further details of the proposed Daylight & Sunlight results.

Dual Aspect

- 9.71 Standard 29 of the GLA's Housing SPG states that developments should minimise the number of single aspect dwellings. The standard goes on to state that single aspects that are north facing or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.
- 9.72 As already mentioned, Part C of the London Plan Policy D6 notes proposed residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution.
- 9.73 The emerging GLA Housing Design and Quality Standards SPD (2020) notes that single aspect dwellings should only be permitted where is it high-quality and that single-aspect, one- and two-bedroom homes may be acceptable (by exception) where limited numbers of rooms are required. The design of single-aspect flats will need to demonstrate that all habitable rooms, and the kitchen, are provided with adequate natural ventilation, privacy, daylight, and thermal comfort. Such flats would require a generous frontage, a shallow plan, and a favourable orientation and/or outlook including views, with care taken to mitigate the potential for overheating without the need for mechanical cooling.
- 9.74 WCC's City Plan states at paragraph 12.2 that high quality can be achieved through design solutions such as a dual aspect to the home for ventilation to reduce overheating and provide suitable internal air quality.
- 9.75 For Site A, the Proposed Development will achieve 100% of the total dwellings configured as dual aspect units. The outline elements (Site B and C), the accompanying Design Code notes the proposed residential units should maximise dual aspect where possible to ensure increased amount of daylight, views in more than just one direction, occupant well-being, higher desirable quality and a choice of light, to align with Standard 29 of the GLA's Housing SPG, Part C of the London Plan Policy D6 and City Plan subtext.

Amenity Space

- 9.76 London Plan Policy D6 sets out that the design of development should ensure that the usability of outside amenity space is maximised.
- 9.77 In terms of private amenity space, each dwelling should have usable private amenity space. These spaces should have openness and protection, appropriate for its outlook and orientation.
- 9.78 With regard to WCC, Policy 12 of the City Plan requires all new-build homes to provide at least 5sqm of private external amenity space for each dwelling designed for one-two persons or more and, where practicable, a further 1sqm for each additional person the dwelling is designed to accommodate.
- 9.79 As stated in the Proposed Development Chapter, every flat within the proposed buildings for Site A will be provided with private amenity space in accordance with the London Housing Design Guide with sizes of 6sqm for 1-bed flats, 7sqm for 2-bed flats and 8sqm for 3-bed flats. Amenity space has been designed with

generous proportions and a minimum width of 1.5 metre that will easily accommodate a 4-person table and chairs. The proposed flat includes various forms of private amenity space including projecting balcony, inset balcony, private terrace and private garden, which depends on the type of the residential unit. All recessed balconies have a single glazed fully openable bi-fold windows. The glazing gives a flexibility to have an open balcony or an enclosed winter garden, which will be protected from elements and therefore can be used all year round. Further to this, the combined use of projecting and inset balconies has been considered in the relationship to the surrounding townscape and the visual impact and a large number of projecting balconies have been balanced against the wider public benefits. Overall, the proposals capture the objectives of the relevant policy requirements in both London Plan and WCC City Plan as every flat in Site A will exceed the minimum requirement of 5sqm of private amenity space for each dwelling and will maximise the usability of amenity space provided in each dwelling.

Inclusivity

- 9.80 The Mayor's Housing SPG (Standard 11) and London Plan D7 requires the Proposed Development to have 10% of all proposed residential units as wheelchair accessible units that Building Regulation requirement M4(3) 'wheelchair user dwellings'. Additionally, all other proposed residential developments within the Site should be accessible and adaptable dwellings.
- 9.81 Similarly, part B of Policy 12 of the City Plan requires the Proposed Development to ensure that 90% of all new-build homes meet the Building Regulation requirements M4 (2) 'accessible and adaptable dwellings' and 10% of all new-build homes (including changes of use) will meet Building Regulation requirement M4 (3) 'wheelchair user dwellings'.
- 9.82 For Site A, as illustrated within the accompanying DAS, 10% of the proposed residential units will be wheelchair user dwellings. The proposed units are circulated between all four buildings and located on the 2nd floor.
- 9.83 For Sites B and C, as confirmed in the Design Code, 10% of the proposed residential units will be wheelchair user dwellings and meet the requirements of Building Regulation requirement M4(3).

Class E Floorspace

Consolidation of Existing Class E Floorspace

- 9.84 London Plan Policy SD8 notes district centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.
- 9.85 Policy 14 of the City Plan states that proposals in existing town centres will enhance and diversify their offer as places to shop, work and spend leisure time. Class E will remain the priority use at ground floor throughout the town centre hierarchy, supported by complementary town centre uses that increase customer dwell time and enhance town centre vitality and viability.

- 9.86 Focusing District Centres, Policy 14 notes District Centres will provide a mix of commercial and community uses to meet residents' day to day shopping needs, provide local employment opportunities, and support opportunities for community interaction.
- 9.87 The existing Site contains 4804sqm retail (shops) floorspace primarily located along Church Street and Edgware Road. The retail units provide a range of offerings for the local community. The current layout of Church Street retail units consists of ground floor and basement lettable areas which make for inefficient use of space. In the majority of cases, the units are wide and shallow resulting in higher Zone A rents for occupiers. The stock is old and prone to leaks from underground water sources, rainwater drainage, and resident units above.
- 9.88 Within Site A, there is also an existing office use, which now falls under use class E and within a ground floor unit located in Derry House on Site C is operated by a business known as 'Asylum Aid'. Asylum Aid is a business that helps migrants and refugees to promote stronger, integrated communities, civic and economic services. This unit is considered to be in an office use within Class E.
- 9.89 The proposed development would result in the demolition of existing retail and office space on site. The proposed development seeks to provide up to 3,500sqm GIA of high quality class E floorspace that could provide either commercial, business, services or retail floorspace. Site A propose 711sqm of Class E.
- 9.90 As mentioned earlier, the site is located along and contains Church Street and Edgware Road, which is classified as a District Centre. The proposed development seeks to provide a flexible and viable consolidated range of functions including retailing, leisure, social infrastructure, local employment and workspace. Through providing a consolidated flexible space, this allows the site to perform against the ongoing challenges facing retail space and optimise the number of housing proposed on Site. Additionally, the ongoing COVID-19 pandemic has highlighted the need for local communities to have a wide range of shopping and services available to them, rather than just retail. Thus the provision of a consolidated flexible commercial space is acceptable in accordance with aims of District Centres for City Plan Policy 14 and London Plan Policy SD8.

Proposed Class E Floorspace

- 9.91 London Plan Policy SD7 states when proposing commercial floorspace (such as Class E), should be assessed against the following points:
1. Ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment;
 2. Ensure that commercial space is appropriately located, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights, and servicing;
 3. Support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents;

4. Support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.
- 9.92 City Plan Policy 14 requires uses that provide active frontages and serve visiting members of the public will be required at the ground floor throughout District Centres. The policy goes on to note District Centres should provide a mix of commercial and community uses. Additionally, the policy notes the provision of a range of retail unit sizes including small stores in redevelopment proposals are supported in principle.
- 9.93 The Proposed Development (Site A, B and C) proposes up to a maximum of 3,500sqm of Class E commercial, business, and services floorspace. Site A includes 711sqm of Class E floorspace.
- 9.94 The Proposed Development seeks to enhance the District Centres commercial offer through allowing flexibility within the Class E use.
- 9.95 With regard to Site A, Class E space is proposed at ground floor and extends along the Church Street frontage and returns on the Edgware Road frontage. The Class E presents an active frontage to Church Street and Edgware Road and reinforces the existing adjacent uses in accordance with London Plan Policy SD7 and City Plan Policy 14.
- 9.96 In addition to the above, a Delivery and Servicing Strategy has been developed in the accompanying Transport Assessment to ensure no negative impacts from the proposed Class E floorspace on the surrounding environment. The accompanying Acoustic Statement and Chapter 8 of the Environmental Statement ensures no adverse impacts on the existing and future occupants of the Site, in accordance with London Plan Policy SD7.
- 9.97 Turning to the outline elements of Site B and C, the proposals allow for up to 2,375 sqm of Class E floorspace. The detailed element of the proposed Class E floorspace is not fixed, however the accompanying Design Code, allows for the proposed commercial units to be located at ground floor and provide active frontages. The proposed Class E floorspace will reinforce the existing active ground floor uses on Church Street complimenting and contributing positively to the market and existing businesses, in accordance with London Plan Policy SD7. Additionally, the accompanying Estate Management Strategy sets out requirements and measures for existing tenants of the site.

Church Street Market Infrastructure

- 9.98 NPPF Paragraph 86 notes planning policies should retain and enhance existing markets and, where appropriate, re-introduce or create new ones.
- 9.99 London Plan Policy E9 Part C(5) supports London's markets in their full variety, including street markets and other measures to improve their management, enhance their offer and contribute to local identity. Further to this, Paragraph 6.9.4 of the supporting text states that street markets play a valuable economic, social and cultural role in helping to meet Londoners' varied dietary requirements, extend choice and access to a range of goods, contribute to the character of high streets and provide opportunities for new businesses to start-up. The document considers street markets as strategically important due to their offer

of attractions for Londoners and visitors to the city and their importance in serving the shopping and leisure needs of a specific ethnic group.

- 9.100 With regard to the WCC City Plan, Policy 6 Part G refers to the priority of providing enhancements to Church Street, specifically in terms of improved facilities for Church Street Market.
- 9.101 Additionally, the Church Street Masterplan SPD (2017) states the importance of improving the market and introducing diversification to the retail and commercial offer are key to creating a thriving economy delivering new jobs and investment.
- 9.102 At the heart of the proposed development is ensuring the long term future of the Church Street market. This includes enhancing the quality of Church Street by providing new public spaces including a new pedestrian connection in Site A. The function of the street market will be improved with new market infrastructure including market storage, welfare facilities and parking, thus improving the facilities needed for market traders to continue trading in the Site post completion, aligning with London Plan Policy E9 and City Plan Policy 6.

Social and Community Infrastructure

Consolidation of existing social and community infrastructure

- 9.103 The proposed scheme for the redevelopment of Church Street Site A, B and C has been driven by an agenda developed with the local community who live in and around the Church Street Market. The market itself, is a core asset for the community with both its character and identity, whilst also providing goods and services, but importantly, providing a community focus where people meet informally and talk. Alongside the market, there are a series of other assets which, to varying degree, have some of the characteristics of community use and which are used to greater and lesser extents. Again, through our programme of engagement, we have sought to listen carefully to the community in order to determine which of those assets are relevant and valued and to define a strategy for their replacement with this in mind. This means that some assets will be replaced in different phases and some assets will be replaced in different formats, in order to better suit anticipated future demand. We consider the future of each identified asset in the context of adopted planning policy below.
- 9.104 Before doing so, we note that at a strategic level Paragraph 93 of the NPPF advice that planning decisions should not result in the unnecessary loss of valued facilities and services that provide social, recreational and cultural facilities and services. Furthermore, it states that planning decisions should ensure the provision of social, recreational and cultural facilities and services that meet community needs, which could be in the form of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments. It is our view that the scheme as proposed achieves this policy ambition.
- 9.105 Policy S1 provides a commentary at a London Plan level. The policy is set into a context provided by part D which seeks to ensure that development proposals make the best use of public land, including the public

sector estate and embrace opportunities to collocate and rationalise or share social infrastructure provision and community facilities where this enables this policy objective.

- 9.106 Part F continues by noting that proposal which result in a loss of social infrastructure where there is need ought only to be permitted where there is either a realistic proposals for re-provision or where the loss is part of a wider public service transformation plan requiring investment in modern and 'fit for purpose' facilities to meet future need and sustain and improve services today.
- 9.107 The proposed development set out realistic proposals for the re-provision of those elements that serve local need and removes facilities that are surplus to requirement or better re-provided as part of a wider transformation plan and these changes are detailed below.
- 9.108 Part D of Policy S1 notes development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
- 9.109 Policy S5 states that existing sports and recreational land and facilities for sports and recreation should be retained unless an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements, or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality of sport or recreational land in a suitable location.
- 9.110 Additionally, Policy HC7 Part A notes boroughs and planning decisions should protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones.
- 9.111 Part B of Policy HC7 states that planning applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.
- 9.112 Policy 17 of the City Plan supports new community infrastructure where there is an identified present or future need and Part C of the policy also seeks to protect existing community floorspace unless it can be demonstrated that either:
- 1) 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; or
 - 2) there is no demand for an alternative social and community use for that facility or floorspace, evidenced by vacancy and appropriate marketing for at least 18 months.

- 9.113 Finally, City Plan Policy 17 Part B notes public houses will be protected throughout Westminster, except where there is no reasonable prospect of its continued use as a public house, as evidenced by appropriate marketing for a period of at least 18 months.
- 9.114 Subtext Paragraph 17.5 notes public houses important role as social hubs at the heart of communities, add to the diversity of commercial areas, and make a positive contribution towards townscape and local identity. They include many premises that have Best Bar None status.
- 9.115 It is evident therefore that there a synergy between the regional and local policy. Both Policies S1 and S5 of the London Plan and Policy 17 of the City Plan seek to ensure the site continues to provide social and community infrastructure through protection or consolidated upgrades unless there is no demand for this use or a strategy for reprovision within the wider area. It is our intent that each of the existing facilities on site that have a community dimension are to be reprovided on site, or are available within the wider area unless they are available to the requirements.

The Uses

- 9.116 Whilst Church Street is predominantly a residential area (market aside), as noted above, there are a series of uses within Site A and within the wider Site B and C. These uses are part of a land use mix and are used to varying degrees by the existing residents and local community. We consider each in turn below.

Library

- 9.117 Church Street Library 'located on Site B' is classified as use class F1 (community). The library is perhaps the most significant community asset in the immediate area and has been at the heart of our plans from inception. The existing library is set behind the existing residential blocks in Site B with a small community garden adjacent to it. The library is approximately 848sqm GIA. The library is accessed via an undercroft from Church Street and is single storey building with two basement levels, thus having limited access to natural sun and daylight. Whilst the library is well used by the local community, it is outdated in comparison to modern day multifunctional spaces provided elsewhere in Central London. It is our intention to deliver a new high quality facility to help 'level-up' and provide greater opportunity for the residents of Church Street.
- 9.118 The library will be reprovided and upgraded to a flexible and useable space for existing and future residents to enjoy as part of Site A. Rather than waiting for the redevelopment of Site B to come forward, the plan is to invest in and bring forward a new library facility within the first phase of development, to be opened before the existing facility is decommissioned, a decision informed by our community listening exercise. The proposed library is designed to be a flexible, usable and workable space. It will perform better in environmental terms than the existing facility and will provide an environment designed from first principles to promote mental wellbeing. The proposed library will also provide a range of uses and be managed in order to accommodate and meet the wider needs of the local community in line with City Plan Policy 17 and the wider objectives of the Church Street Masterplan SPD.

Community Hall

9.119 Derry Hall Community Centre located on Site C provides a space for members of the local area to use for recreational activities. The Community Centre is approximately 23 sqm (GIA). The proposed development as part of the outline application provides up to 459sqm of community floorspace to enable reprovision. Additionally, the proposed library on Site A can provide adequate provision for any of the community activities and the Lisson Grove Hub should also be available to ensure continuity of services during construction of the last phases of the development.

Dental Practice

9.120 The existing dental practice located on Site B is classified as use class E. The existing dental practice is approximately 120sqm (GIA). The proposed development allows the reprovision of up to 3,500sqm class E floorspace that is capable of subdivision into a range of sizes of units to suit demand. Chapter 13 of the accompanying Environmental Statement (ES), notes when the proposed development is built out at the maximum parameters there would be negligible (not significant), permanent effect on primary healthcare provision locally. Therefore, the loss of the dental practice should not impact the supply of dental spaces available for future and existing residents. Nevertheless, should this demand change, the proposed development allows for a dentist as part of the proposed class E space.

Recreational Space

9.121 Within the Site, there are two areas for recreation and play space. The first space is a rundown court on Site B which is located at basement level. The space is unattractive, sits in the centre of a car park and has been locked up for over 6 years due to health and safety issues. This space is evidently unused and makes no current contribution to the Church Street Estate. The second space, which is at grade and open to the air is located within Site C, which will be brought forward as part of the third phase.

9.122 As part of our assessment, we have considered the available recreational facilities in the wider area. Within the local area there are several spaces of recreation including Broadley Street Gardens, a medium sized public space utilised by the adjacent school and the local community and a small playground and green space just off Lisson Street. Slightly further afield are St. Mary's Churchyard and Paddington Basin. Significantly, two of London's largest public parks are within walking distance of the site, namely Hyde Park to the south-east and Regents Park to the north-east. Additionally, a project is currently underway to enhance Salisbury Street and Broadley Street Gardens with a 'Green Spine' that will connect across Church Street to the new Luton Street development. The Luton Street development is a WCC scheme that is due to be completed in 2022. Alongside new high-quality homes, a sports hall and community space are being built which will benefit members of the Church Street community.

9.123 Specifically, when asked about the availability of recreational space, our local community engagement programme has noted a desire for good quality play space. Our proposals therefore seek to provide c.5,664sqm of replacement recreational space which has been designed as playspace that caters for the needs of all ages group and which specifically meets the community aspiration for an enhanced play offer. In quantitative terms, this provision exceeds the London Plan requirement of 4,873sqm and therefore is a more appropriate response to meet local needs requirements for recreational space.

9.124 Of importance to note is the Church Street Masterplan SPD (2017), which sets out the other sites either due to come forward or where construction is already underway. These include Luton Street Development (now known as Carrick Yard), which will be complete by 2022 and will provide a new community sports and recreation facility. It will provide three playing courts, located at basement level. The sports and recreation facility would be accessed from the Green Spine and can be used by the Church Street community.

9.125 Accordingly, the re-provision on the Site as well as other provision elsewhere in the locality is in line with the Church Street Masterplan which seeks to re-provide, upgrade and more efficiently provide recreation and play areas across the Site and wider Masterplan Area as part of a transformational strategy in compliance with City Plan and London Plan.

Public House

9.126 The Site contains an existing pub known as 'Lord High Admiral' located at Site A. The pub comprises of 174 sqm GIA of Public House Sui Generis floorspace.

9.127 The pub is contemporary with the wider Estate and has no significant architectural quality or historical association to Church Street as the pub is not listed, locally listed nor located within a Conservation Area.

9.128 According to WCC online records, the pub is not listed as an Asset of Community Value nor has there ever been any attempt to list the pub as an Asset of Community Value. Nor, unlike other assets across the Site which the community identified as important, was the pub cited as a community asset during the extensive and multiple rounds of public consultation with residents. Indeed, the local communities social life is focused on other assets in the immediate area.

9.129 As stated earlier, the Site has other existing community facilities on site that are to be re-provided as part of the proposed development.

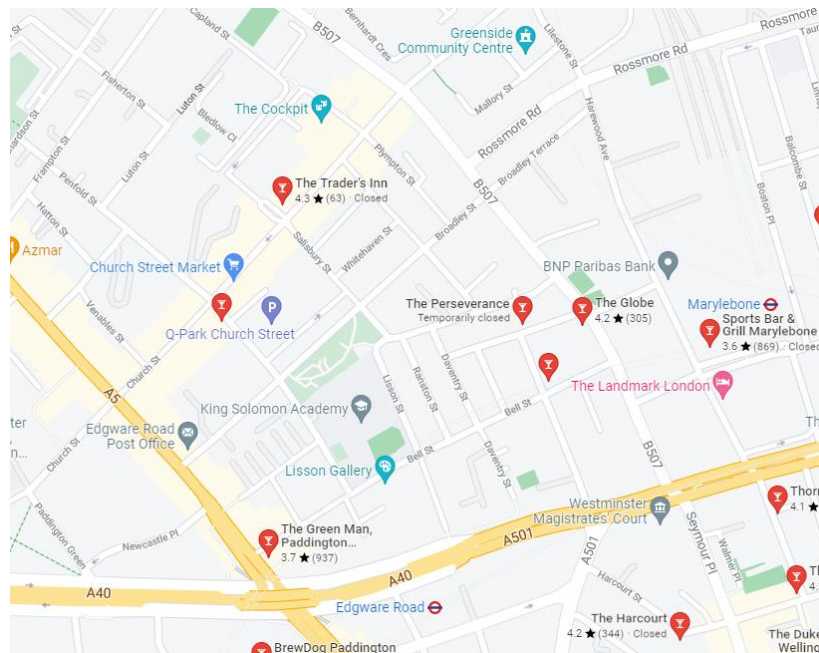
9.130 With regard to cultural identity, the pub is not located within night-time economy areas, Cultural Quarter or Creative Enterprise Zone. Nor is the pub listed as having Best Bar status.

9.131 On our analysis, the pub therefore has no or limited heritage, cultural, economic or social value and does not sit in one of the areas which specific protection would be afforded to the use. Policy HC7 of the London Plan on the face of the matters therefore does not apply. Whilst Policy 17 of the City Plan is engaged, the criteria which lead WCC to seek to protect all pubs are not found in this instance as the premises make no or little contribution to local townscape or identity, there are multiple pubs within the surrounding area to ensure diversity within the commercial area, and the existing pub is not considered as a social hub based on the feedback received through extensive engagement from the local community.

9.132 The below map extract shows existing pubs within the area. These pubs are within walking distance of the site and provide sufficient choice and range of facilities to meet need.

Planning Statement

Church Street Sites A, B and C



- 9.133 Focusing on the City Plan, online evidence such as Business Records and the pub's website indicates the pub is still in active use and is not currently vacant. Therefore, the Applicant would not be able to provide 18 active months of advertising of the Site.
- 9.134 On the basis of our analysis, there is no clear case for the re-provision of a new pub as part of the wider proposed development. However, should it become clear that there is a strong and proven community desire to retain the pub that has not been evident in consultation to date, the Development Specification for the later phases of the development has been prepared to allow for a public house by identifying an allowance of up to 174sqm Sui Generis space. Whilst the detail of this element is not fixed at this stage, the proposed pub could be designed for modern day users and contribute towards the night time economy. Given the allowance for re-provision of like for like pub floorspace as part of the outline element, the masterplan therefore allows for the potential to mitigate the impact of the loss of the pub should this be required.

Ongoing Reporting

- 9.135 Finally to note WCC have instructed GCDA to undertake a Community Infrastructure Strategy Report for the Church Street Ward. Whilst the Report is still in draft form, a key finding of this assessment is that the retained and proposed community facilities when regeneration is completed can meet the needs of the existing and projected population.

Proposed social and community infrastructure

- 9.136 As noted in the preceding paragraphs, those facilities that currently provide some level of community function across the Church Street Estate are either to be re-provided in upgraded form (e.g. the Library), 'baked in' to the proposed development in terms of future floorspace provision (e.g. dentist) or are to be

replaced with facilities that are seen by the local community to be greater relevance and that better meet need in accordance with WCC's strategy (e.g. the recreational areas). This section considers the approach to the new provision in the context of the adopted planning policy.

- 9.137 London Plan Policy SD6 states that the provision of social infrastructure should be enhanced, particularly where it is necessary to support an identified need from local residents, and facilities should be located in places that maximise footfall to surrounding town centre uses.
- 9.138 City Plan Policy 6 notes the Church Street / Edgware Road Housing Renewal Area should provide Community facilities, including a new health and well-being hub.
- 9.139 City Plan Policy 17 states new community infrastructure and facilities will be supported where there is an identified present or future need. Where new facilities are provided they should be designed to accommodate a range of community uses wherever possible.
- 9.140 A key principle throughout design development of the Site has been to ensure Church Street unique character and community spirit remains and is enhanced as part of the proposals. Accordingly the proposed social and community uses have been a key consideration within the Proposed Development.
- 9.141 The Church Street Masterplan SPD considers the provision of social and community infrastructure within the wider area, including recreational facilities at Carrick Yard and the Health and Wellbeing Hub at Lisson Grove to the north of the Site. Additionally, as noted earlier, WCC are preparing a Community Infrastructure Strategy to ensure the delivery of a sustainable place for the future.
- 9.142 As discussed earlier, the proposed library on Site A is designed as a bespoke facility to meet the needs of the local community, dovetailing with other local community facilities and anticipating the way that library and community services are likely to be delivered in the future. The proposed library will be built prior to the demolition of the Site B library to ensure continuity of service for the wider community.
- 9.143 The proposed new library will be in a prominent location and highly visible on Church Street, in accordance with London Plan Policy SD6. The new library has been designed following extensive and ongoing consultation with the local community and the Library Group, which ensures a bespoke design for a facility that meets the needs of the local community. The library can accommodate a range of uses such a work space, reading, education, and community areas. It will include a library garden to the rear for recreational use designed to enhance mental and physical wellbeing. As such the proposed library aligns with the NPPF, London Plan SD6 and City Plan Policy 17.
- 9.144 The Proposed Development will deliver a minimum of 843sqm and a maximum of 1,000sqm of social and community floorspace in the Church Street Housing Renewal Area. The delivery of community facilities is supported in this location in accordance with City Plan Policy 6.
- 9.145 The detailed design of facilities to be provided within Sites B and C will come forward as part of a Reserved Matters Application in due course. However, the accompanying Design Code, Parameter Plans and DAS set out the standards for the proposed community floorspace and provide the commitment to delivery and specification.

9.146 As demonstrated within the accompanying Parameter Plans, the proposed community uses will be located centrally within the Site to improve footfall and accessibility over that which currently exists, in accordance with London Plan Policy SD6.

Education

9.147 London Plan Policy S3 note LPA's should ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice by identifying sites for future provision through the Development Plan process. In particular, this should focus on areas with significant planned growth or need for school places and ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.

9.148 In accordance with Policy S3, Chapter 13 of the accompanying ES provides estimation of the proposed developments impact on primary and secondary school places across the City. The proposed development once complete is expected to require an additional 131 primary school places and 63 secondary school places. However, as noted within Chapter 13, there is currently a surplus of 1,099 primary school places and 1,126 of secondary school place within 2km of the site. As such, the proposed development is expected to have a negligible impact on education places within the City.

Density

9.149 Paragraph 124 NPPF states that, in respect of density, consideration should be given to whether a place is well designed and "*the desirability of maintaining an area's prevailing character and setting...or of promoting regeneration and change*".

9.150 London Plan Policy D3 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially on sites with existing or planned PTAL levels of 3-6; or schemes comprising mixed use re-development of car parks and low density retail parks.

9.151 London Plan Policy D3 also focuses on a design-led approach, using the three headings of form and layout, experience and quality and character, which is set out in a number of criteria. Whilst Site B and C are in outline and the detail will be confirmed through Reserved Matters Application, Site A will set the standard, as outlined below:

Table 16: Assessment against London Plan Policy D3

London Plan Policy D3	Proposed Development
<ul style="list-style-type: none"> enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions 	Height and massing have been considered in relation to the impact on neighbouring buildings and public realm, whilst seeking to optimise the quantum of development on a centrally-located urban site.



	<p>The development seeks to provide an appropriate transition in scale from the height and density of existing and emerging developments in Paddington Basin to the historic context of Marylebone. Heights are typically 8-11 storeys with variation in height and the use of set-backs to provide a granular feel to the development. Localised points of height have been developed to act as visual markers to punctuate important public spaces and views. These are located on:</p> <ul style="list-style-type: none"> • The eastern corner of Site A addressing Broadley Gardens (14 storeys) • The western corner of Site B on the corner of Church Street and Penfold Street (12 storeys) • The southern block of Site C addressing Church Street (13 storeys) <p>In terms of layout for Site A, as noted above, Site A is split into two urban blocks, separated by a new pedestrianised street to promote a stronger relationship with Venables Street and extends the existing urban structure of tertiary streets behind Edgware Road. This ensures that the proposals positively respond to local distinctiveness of Venables Street and enhance the local context by adding a new pedestrianised street to support the emerging street hierarchy. Furthermore, the two separate urban blocks are closer in scale to the size, grain and proportion of urban blocks within the local context.</p> <p>With regard to height and massing for Site A, a harmonious streetscape with a degree of variation and localised points of modest height have been created. The Proposed Development seeks to make an appropriate transition from the height and scale of Paddington Basin towards Marylebone. The heights on Site A are generally 9-11 storeys.</p> <p>The proposed materials are of high quality and appearance to match the elegant profile proposed for the Site.</p>
<ul style="list-style-type: none"> • encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 	<p>As noted above, Site A will be split into two urban blocks, separated by a new pedestrianised street – called 'New Street Gardens'. This will extend the connection provided by Venables Street to the north, as well as providing pedestrian access for residents within Site A.</p>

	<p>A secure pedestrian route will be provided in Site A as part of the market infrastructure improvement for market traders to access from the storage area to Church Street.</p> <p>Church Street itself is proposed to be reinvented as a pedestrian focussed space providing a market for all users in a landscaped setting. The layout of the market stalls themselves would allow a better pedestrian movement around them and also near the retail facilities on the ground floors.</p> <p>The Proposed Development will provide 690 long stay cycle parking spaces and 10 short stay cycle parking spaces for Site A.</p>
<ul style="list-style-type: none"> • be street-based with clearly defined public and private environments 	<p>The Proposed Development seeks to reconnect the Site with its surroundings by carefully locating new streets and well-designed public spaces. The private and public environments will be well-defined by being located appropriately to respond to the architecture and for the needs of the residents and the wider public. The ground floor layout will be designed to introduce a conventional street-based layout with active frontage addressing adjacent streets and an increased amount of public and communal green open space.</p>
<ul style="list-style-type: none"> • facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users 	<p>Servicing requirements are dealt with discretely to reduce the impact on the adjacent street scene. The Proposed Development will aim to ensure that the servicing of the development can be carried out safely, legally and efficiently, without creating any negative impacts on the local highway network, neighbouring businesses, local residents and the environment. Regular reviews of delivery and servicing vehicle activity will be held by the site management team and as part of the Framework Travel Plan. Any issues identified will be raised at the Steering Group meetings and dealt with accordingly through existing processes.</p>
<ul style="list-style-type: none"> • achieve safe, secure and inclusive environments 	<p>As set out in the DAS, the design has been developed to facilitate ease of access for all residents and visitors to the buildings to create a development that is inclusive and accessible for all. The development has been designed in consultation with the Metropolitan Police Crime Prevention Officer and with in accordance with</p>



	<p>Approved Document Q: Safety, dwellings of the Building Regulations to ensure a safe and secure environment for residents, building users, visitors and the local community, to enhance perceptions of safety and reduce crime and anti-social behaviour in the local area. Meetings were held with the Crime Prevention Officer in May 2019 and November 2020 to review the emerging design and the recommendations provided have been incorporated into the design as it has evolved. As a result, the layout of the development has been designed from these principles to follow best practice to improve safety and security.</p>
<ul style="list-style-type: none"> • provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 	<p>In terms of retail, the retail space will be concentrated on the ground floor along Church Street, consolidating and reinforcing the existing retail space along the street and providing a continuous active frontage. Further to this, market infrastructure will be embedded within the centre of each of the Sites to maintain the active frontage to adjacent streets.</p> <p>Commercial and community spaces at Site A will have a mix of uses on the ground floor, which will provide an active frontage to Church Street with residential use providing an active frontage to Broadley Street, Penfold Street and the new street.</p> <p>For Sites B and C, commercial and/or community spaces will provide an active frontage to Church Street with residential use providing an active frontage to Salisbury Street, Penfold Street and the frontage addressing Broadley Gardens. Commercial and/or community uses on the ground floor on the corner of Salisbury Street and Broadley Gardens will complement this corner where the green spine meets Broadley Gardens. The building on Site C will comprise a mix of uses on the ground floor with residential on the floors above. This proposed building will also introduce an active frontage of commercial use to Venables Street, enhancing the quality of the pedestrian connection between Boscobel Street and Church Street.</p> <p>In addition, the new pedestrianised street - New Street Gardens - for Site A will provide a stronger relationship with Venables Street and promotes footfall to the street as a result.</p>

	<p>These proposals will create a positive reciprocal relationship between buildings and the surrounding environment and will increase footfall, thus generating liveliness and interest among visitors and residents.</p>
<ul style="list-style-type: none"> • deliver appropriate outlook, privacy and amenity 	<p>For Site A, the proposed projecting balconies for residential units will have 1,100mm high metal balustrades and perforated metal screens up to 800mm. The glazing on openable bi-fold windows in the recessed balconies will follow the size of the opening – full height on lower floors and 600mm cill on upper floors. The perforated metal screen maintains privacy and visual appearance but also provides a degree of transparency. Ground floor flats on Block 1A and duplex flats on Block 1B will have private gardens addressing the central communal gardens.</p>
<ul style="list-style-type: none"> • provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 	<p>The Proposed Development will provide 5,664sqm of play space across the wider Site, which will be conveniently located within the application site and used for play, socialisation, relaxation and physical activities for all age groups.</p> <p>For Site C, a new open space will be created between the proposed building and Kennet House, enhancing the setting of the existing building. This open space is conveniently located in the centre of Site C, providing the residents with high-quality open space for physical activities, social interaction, relaxation and play.</p>
<ul style="list-style-type: none"> • help prevent or mitigate the impacts of noise and poor air quality 	<p>Acoustic ratings of the glazing elements (windows and doors) to flats will be rated appropriately to provide good internal noise levels (with windows closed), as required by national standards and local planning conditions.</p> <p>The residential flats are provided with mechanical ventilation, and Fan Coil Units which provide heating and cooling as required. Thus, even in the warmer months, residents will not need to open windows if they prefer not to, thus providing good acoustic comfort whenever required.</p> <p>Sound insulation between dwellings will be at least 5 dB better than Part E Building Regulations minimum requirements, with higher isolation provided over the ground floor commercial and Library spaces.</p>

	<p>With regard to air quality, the Proposed Development will provide carry out regular site inspections to monitor compliance with the dust management plan and record results, keep site fencing, barriers and scaffolding clean using wet methods and ensure all vehicles switch off engine when stationary to reduce construction dust during the construction phase. Furthermore, the ES Chapter for Air Quality concludes that the transport and building emissions are well below the benchmark for NOx and PM10 and therefore the Proposed Development can be considered 'air quality neutral', meeting the requirements of this policy. Further details in terms of mitigation measures for air quality are provided in this chapter.</p>
<ul style="list-style-type: none"> • achieve indoor and outdoor environments that are comfortable and inviting for people to use 	<p>In terms of indoor environment, every dwelling in Site A will be dual aspect. In a warming climate, this will help to provide passive cooling, providing a comfortable internal environment without reliance on mechanical methods.</p> <p>In terms of outdoor environment, significant improvements will be made to the public realm to ensure that the space is inviting for residents and visitors to use. As set out in the DAS, for the public realm the aim is to provide an updated public realm for the Church Street Market that is more aesthetically pleasing, more easily cleanable and more fit for use by market traders, visitors and residents via the introduction of green spaces, planting and tree where possible to enhance the streetscape, updating the market layout that rationalises the pitch dimensions to 3x3m and moves the pitches to a back to back arrangement and providing updated materiality that is inviting for people to come.</p>
<ul style="list-style-type: none"> • respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character 	<p>Accompanying the application is the HTVIA, which assesses the Proposed Development impact.</p> <p>The assessment concludes that the Proposed Development will make a significant contribution to the estate regeneration. The Proposed Development will provide wayfinding and will improve the legibility of the surrounding townscape with significant benefits to the quality of the urban design principles and public realm on the Site without harm to designated heritage assets.</p>

<ul style="list-style-type: none"> • be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well 	<p>For Site A, the Proposed Development uses brick as the predominant material because it will be the dominant material in the local area and is a low maintenance, attractive, robust, modestly priced material that gives a strong sense of solidity and weathers well in preserving a high-quality appearance for the long run. The brick will be in two colours: a red and a creamy-white, which echoes the use of red brick and creamy-white stucco on typical Westminster mansion blocks and also found in the adjacent frontage at 354-380 Edgware Road. Therefore, the architectural quality will be high and well-blended into the surrounding area.</p> <p>As stated above, the materials of the building are carefully designed to be sustainable, adaptable and durable.</p> <p>With regard to Sites B and C, the Design Code sets out high standards for materials that should be adopted for the Outline Area. The proposed architectural quality and material are in keeping with Site A design.</p>
<ul style="list-style-type: none"> • aim for high sustainability standards (with reference to the policies within London Plan Chapter's 8 and 9) and take into account the principles of the circular economy 	<p>The Sustainability Appraisal confirms that the Proposed Development will adopt the energy hierarchy – Be Lean, Be Clean and Be Green – to maximise the sustainability of the Proposed Development. These measures will ensure a high sustainability standard for the Proposed Development, which are set out in the Appraisal. With respect to the Circular Economy, the Proposed Development commits to deriving at least 20% of the total value of materials in major building elements from recycled and reused content in the products and materials selected; recycling/reusing/recovering 95% of construction and demolition waste, and putting 95% of excavation waste to beneficial use; and targeting 65% of municipal waste to be diverted from landfill by 2030; and carrying out embodied carbon modelling to inform the design development and material specification.</p>
<ul style="list-style-type: none"> • provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water 	<p>The DAS confirms that the Urban Greening Factor ('UGF') score will be above 0.4, which exceeds the minimum requirement as set out in London Plan Policy G5. The UGF score will result in an increase in green cover and improvement to the layout and design of new buildings within the Proposed Development, thus creating attractive places.</p>

	In terms of resilience and managing surface water, linear threshold drains will be provided across all access thresholds of the proposed buildings. The existing surface water discharge from the Site will be reduced significantly as a result of the proposed improvements to the open space and a number of measures such as tree planting, increased green cover, green roofs and sustainable drainage systems (such as self-infiltrating permeable surfaces, blue podium roof and underground attenuation tanks).
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9.137 The Proposed Development meets the criteria in terms of form and layout, experience and quality, and character London Plan Policy D3, as such it can be accepted the Site is appropriate for high density development.

9.138 Overall, the Site is brownfield land, allocated as a District Centre, within a Housing Renewal Area and located within Central London that has access to excellent public transportation and the surrounding and emerging precedent of high density living. As such, the Proposed Development is assessed as being acceptable against the relevant policies and therefore the Proposed Development will be delivering a significant quantum of housing. In this regard the Proposed Development accords with the London Plan Policy D3.

Design

Components of Good Design

9.139 The NPPF clearly establishes that the Government attaches great importance to the design of the built environment. Good design is stated as being a key aspect of sustainable development and is indivisible from good planning.

9.140 London Plan Policy D4 outlines that the form and layout of a place should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, which have clearly defined public and private environments. They should “provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.”

9.141 At local level, City Plan Policy 38 ensures new development incorporate exemplary standards of high quality, sustainable and inclusive urban design and architecture befitting Westminster’s world-class status, environment and heritage and its diverse range of locally distinctive neighbourhoods. Part B sets out that all development will positively contribute to Westminster’s townscape and streetscape, having regard to:

- 1) the character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them and the pattern and grain of existing streets, squares, mews, and passageways;

- 2) materials, building lines, scale, orientation, access, definition, surface treatment, height, and massing;
- 3) the form, character and ecological value of parks, gardens, and other open spaces;
- 4) Westminster's waterways and waterbodies; and
- 5) the preservation and enhancement of the surrounding tree population.

9.142 Part C of the policy emphasises the importance of people-centred design, which place people at the heart of design, creating inclusive and accessible spaces and places. This includes introducing measures that reduce the opportunity for crime and anti-social behaviour, promoting health, wellbeing, and active lifestyles through design and ensuring a good standard of amenity for new and existing occupiers.

9.143 The design of the Proposed Development has been developed over 3 years of pre-application advice discussions with WCC, GLA, and TfL. The Proposed Development has also been tested at six rounds of public consultation, which has resulted in a robust design development process that has been subject to scrutiny and input from a significant number of experts in design quality. A full assessment of the proposed design of Sites A, B, and C is contained within the DAS. The Design Code and Parameter Plans have been produced to provide a guide and requirements for future development (Sites B and C) and which again enshrines the core agreed design principles. Therefore, the process accords with the relevant policy requirements of the NPPF, London Plan Policy D4 and WCC City Plan Policy 38.

Layout & Form

9.144 London Plan Policies GG2, D1, and D2 seek to ensure that new development respond positively to local form, style, and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment and are high quality. London Plan Policy D3 requires developments to optimise capacity through a design-led approach, by responding to a site's context, capacity for growth, and supporting infrastructure capacity.

9.145 As set out in the Proposed Development, the layout of the Proposed Development in Site A will focus on two urban blocks, A1 and A2, which have been split, separated by New Street Gardens. This pedestrianised street will deliver a stronger relationship with Venables Street and extends the existing urban structure of tertiary streets behind Edgware Road. The two separate urban blocks are closer in scale to the size, grain and proportion of urban blocks within the local context. the introduction of New Street Gardens provides a greater sense of openness and more natural light to be drawn into Church Street. The pedestrianised street will not be constrained by underground services and therefore presents an opportunity to introduce trees, planting, and Sustainable Drainage Systems, thereby making a positive contribution to the quantum of green open space in the local area. The design of the ground floor of both urban blocks seek to distribute uses in a legible, rational, and efficient layout that compliments and reinforces adjacent uses whilst maximising the extent of active frontage.

9.146 With regard to Sites B and C, the proposed layout and form remain illustrative at this stage as these are a part of the Outline Planning Application and as such the detail is not fixed and would come forward as part

of the RMA. Notwithstanding, the design principles are set out, noting that Site B comprises a single courtyard block with a mix of uses on the ground floor and residential on the floors above. Commercial and/or community spaces will provide an active frontage to Salisbury Street, Penfold Street and the frontage addressing Broadley Gardens. Commercial and/or community uses on the ground floor on the corner of Salisbury Street and Broadley Gardens will complement this corner where the green spine meets Broadley Gardens.

- 9.147 Site C also comprises a single courtyard block with a wing extending along Venables Street to Church Street. The building will have a mix of uses on the ground floor with residential on the floors above. In addition to this, a new open space will be created between the proposed building and Kennet House enhancing the setting of the existing building.
- 9.148 In terms of form, scale and massing have been considered across the three Sites to create a harmonious streetscape with a degree of variation and localised points of modest height where appropriate.
- 9.149 These proposals meet the requirements of London Plan Policy D3 through optimising capacity based on a design-led approach and responding to the site's context. Furthermore, the Proposed Development will make a positive contribution towards the local form, style and appearance to integrate into the local character of Church Street with a strengthened, positive relationship with the natural environment and enhancement of the historic environment and are of high-quality design.

Elevations

- 9.150 London Plan Policies D3 and D4 emphasises good-quality design for buildings in an application site. Specifically, the general thrust of Policy D3 seeks to ensure that the proposals respond to the existing character of a place and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character. High architectural quality that pays attention to detail and gives thorough consideration to the practicality of use, flexibility, safety, and building lifespan and the use of attractive, robust materials which weather and mature well.
- 9.151 Focusing on Site A, the Proposed Development will ensure that the elevations respect the existing elevations on the Edgware Road frontage which varies between 7-11 storeys along the majority of the frontage. There are two-storey setbacks on the upper floors and a rhythm of projecting and recessed bays. Furthermore, the flexible commercial and library frontage on the ground floor is distinguished by a distinctive façade with semi-circular arches with decorative red brick surrounds. The proposed elevations for Site A accord with London Plan Policies D3 and D4 in terms of responding to the existing character of the Church Street area and respecting, enhancing, and utilising the architectural features that contribute towards the local character.
- 9.152 In terms of the Illustrative Masterplan, the proposed elevations have been broken up into taller 'villas' to reduce the perceived size and scale of the blocks. A plinth has been introduced on the ground floor to support the different uses on the ground floor, retail, enterprise, library, and duplex flats and utilises a particular material: pigmented precast concrete on Site B and ceramic tile on Site C. These materials ensure durability and create a localised element of distinction at key townscape junctions. The arrangement and style of windows and balconies establishes a hierarchy between the base, middle, and

top of buildings which is further reinforced by additional articulations and detailing in the facades. As noted in Chapter 6, all recessed balconies will have a single glazed fully openable bi-fold windows, which gives a flexibility to have an open balcony or an enclosed winter garden that will be protected from elements and can be used all year round. Further to these, further variation has been added to the proposed elevations depending on the uses within the particular buildings and the respective context which ensures distinction for the buildings within the Site. This is consistent with the relevant policy requirements in terms of respecting, enhancing and utilising the architectural features of the existing local character and will be of high architectural quality, durable, robust, safe, and flexible.

Tall Buildings

- 9.153 Paragraph 137 of the NPPF considers that good design, which includes the design of taller buildings, is a key objective of delivering sustainable development. The NPPF also includes a requirement for local planning authorities to ensure that proposals optimise the potential of sites to accommodate development.
- 9.154 London Plan Policy D9 requires the Local Planning Authority ('LPA') to define what is considered a tall building and where appropriate locations for tall buildings are. The proposed development should address the visual, functional, environmental and cumulative impacts from the proposed development, which sets out specific criteria in the table below:

Table 17: Assessment of London Plan Policy D9

London Plan Policy D9	Illustrative Masterplan
Visual Impacts	
a) the views of buildings from different distances	Accompanying this application is the Built Heritage, Townscape and Visual Impact Assessment ('HTVIA'), which assesses the likely effect of the Proposed Development on visual receptors.
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	The massing approach has been developed on a townscape scale, looking at the combination of buildings and how new and existing buildings interact to create a cluster and define an appropriate skyline for the Church Street Estate Regeneration, acting to blend the existing tower forms back into a wider setting. With regard to Site A, the tallest element is 14 storeys and has been positioned to complement the existing residential towers and act as marker for the Outline Area.
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	For Site A, the Proposed Development uses brick as the predominant material because it will be the dominant material in the local area and is a low maintenance, attractive, robust, modestly priced material that gives a strong sense of solidity and

	<p>weathers well in preserving a high-quality appearance for the long run. The brick will be in two colours: a red and a creamy-white, which echoes the use of red brick and creamy-white stucco on typical Westminster mansion blocks and also found in the adjacent frontage at 354-380 Edgware Road. Therefore, the architectural quality will be high and well-blended into the surrounding area.</p> <p>As stated above, the materials of the building are carefully designed to be sustainable, adaptable and durable.</p> <p>With regard to Sites B and C, the Design Code sets out high standards for materials that should be adopted for the Outline Area. The proposed architectural quality and material are in keeping with Site A design.</p>
<p>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</p>	<p>Accompanying the application is the HTVIA, which assesses the Proposed Development impact.</p> <p>The assessment concludes that the Proposed Development will make a significant contribution to the estate regeneration. The Proposed Development will provide wayfinding and will improve the legibility of the surrounding townscape with significant benefits to the quality of the urban design principles and public realm on the Site without harm to designated heritage assets.</p>
<p>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</p>	<p>The Site is not located within a World Heritage Site nor is it within the setting of one.</p>
<p>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</p>	<p>The Site is not located near the River Thames.</p>
<p>g) buildings should not cause adverse reflected glare</p>	<p>Chapter 11 of the Environment Statement provides an assessment of solar glare in relation to the Proposed Development. The assessment is based upon the specified materials for the buildings in Site A of the Proposed Development. The materials in relation to Sites B and C are not confirmed at this stage and are therefore specified as non-reflective and will need to be considered further in relation to their RMAs.</p> <p>The ES Chapter concluded that the majority of viewpoints would have no impact to minor adverse</p>



	<p>in terms of reflected glare (i.e. not significant). A series of mitigation measures to address these viewpoints with potential minor adverse impacts has been considered and embedded within the design. These include the orientation of the reflective elements on the façade, reducing large areas of glazing or reflective cladding and façade features such as fins. For the Outline Area, once the design is articulated at the reserved matters stage, the facades will be reviewed to consider the potential for solar reflections.</p>
<p>h) buildings should be designed to minimise light pollution from internal and external lighting</p>	<p>The Proposed Development has been designed to minimise light pollution impacts during demolition, construction and operation. Light pollution from the scheme will be minimised through careful lighting design and compliance with the Institution of Lighting Professionals Guidance notes for the reduction of obtrusive light, 2011.</p>
<p>Functional Impacts</p>	
<p>a) the internal and external design, including construction detailing, the building’s materials and its emergency exit routes must ensure the safety of all occupants</p>	<p>The accompanying application is supported by a Fire Statement and has been reviewed by a Secure by Design Officer to ensure safety is maintained and enhanced throughout the Proposed Development.</p>
<p>b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process</p>	<p>In accordance with WCC City Plan, the development aims at providing consolidated facilities for servicing and deliveries in accordance with London Plan policy. The City Plan further stresses that the net loss of existing off-street facilities will be resisted. As such the development proposals aim at no or reduced net loss of on-street parking and residential amenity. These details will be resolved for Sites B and C but the principles established for Site A will be carried forward for the outline elements.</p> <p>The Proposed Development will seek to ensure that the servicing of the development can be carried out safely, legally and efficiently, without creating any negative impacts on the local highway network, neighbouring businesses, local residents and the environment.</p>
<p>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</p>	<p>The Proposed Development for Site A has been assessed by a Secure by Design Officer of the MET Police for safety. A further assessment would be required for the RMA.</p> <p>Above ground the buildings in Site A are configured in clusters of apartments to minimise</p>

	<p>corridor lengths and waiting times. Two lifts are proposed in each dwelling in Site A and also Sites B and C, which is appropriate for the number of residents using the lifts.</p>
<p>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</p>	<p>The Proposed Development has been assessed within the accompanying Transport Assessment to ensure the transport network is capable of accommodating the additional capacity requirements of the development.</p> <p>The Transport Assessment concludes that the future occupants of the Site will be able to access key transport facilities, such as Edgware Road, London Marylebone and Baker Street Underground station, as well as Regent's Park and Hyde Park; the proposed levels of car parking are considered to be appropriate as it notes that the WCC car parking survey from 2015 shows that there is a spare capacity of 287 spaces or 23% in the Church Street ward. Current residents from Sites A, B and C make up a significant proportion of the vehicles parked, and the 5% parking ratio will help reduce the reliance on on-street parking freeing up space for essential public realm enhancements.</p>
<p>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</p>	<p>The Proposed Development as set out within Chapter 13 of the Environment Statement would support 197 full-time construction jobs once the leakage, displacement and multiplier effects have been considered, which accounts for the range of land uses across the Proposed Development.</p> <p>The Proposed Development will also provide a range of non-residential uses in a reconfigured layout, which in turn will generate an increase in footfall and thus additional spending within Church Street.</p>
<p>f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings</p>	<p>Aviation risks, telecommunication and solar energy generation from the Proposed Development were scoped out as a risk as part of the Environmental Statement Scoping Opinion as they are not considered as an Environmental issue.</p>
<p><i>Environmental Impacts</i></p>	
<p>a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building</p>	<p>For wind, during the construction and demolition, Chapter 16 of the ES notes that it is expected that the influence of the Proposed Scheme on wind conditions at the Site and in the immediate surrounding area will increase gradually as construction progresses from the Baseline</p>

	<p>scenario to reach a maximum equal to the influence of the complete operational development. After the completion of the Proposed Development, on-site pedestrian thoroughfares around the Site would have wind conditions suitable for sitting to strolling use during the windiest season, acceptable conditions for the intended use, representing moderate beneficial to negligible effects (i.e. not significant). Instances of strong winds would be likely to occur off-Site where walking use wind conditions would occur during the windiest season. As discussed above, the walking use wind conditions in these areas are either calmer than those in the Baseline or are not attributable to the Proposed Scheme, therefore mitigation measures would not be required. Further details are provided in the ES Chapter.</p> <p>Additionally, the accompanying Daylight Sunlight Assessment provides further details.</p>
<p>b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street level conditions</p>	<p>The construction works have the potential to create dust. During construction it is recommended that a package of mitigation measures is put in place to minimise the risk of elevated PM10 concentrations and dust nuisance in the surrounding area. With mitigation in place the construction impacts are judged as not significant.</p> <p>The impacts of road traffic during the demolition and construction phase of the Proposed Scheme have been assessed. Detailed modelling of peak construction impacts in 2026 (utilising 2022 backgrounds and emission factors) has been undertaken at discrete human receptor locations. Impacts at all receptors have been classified as 'negligible, therefore the air quality effects of road traffic during the demolition and construction phase are judged to be 'not significant' and additional mitigation is not considered to be required. With regards to the PM_{2.5} WHO guideline values, they are exceeded at all receptors assessed.</p> <p>The impacts of road traffic during the operational phase of the Proposed Scheme have been assessed. Since there is a reduction of traffic expected as a result of the Proposed Scheme, a site suitability assessment has been undertaken, without the need to assess impacts from the Proposed Scheme on sensitive existing receptors. There are no predicted exceedances of the NO₂, PM₁₀ and PM_{2.5} air quality strategy objectives at</p>

	any of the new residential units within the Site during 2026 (with Site A completed) and 2035 (with all sites completed). Therefore, as per the relevant requirements of the NPPF, the Site is considered suitable for the proposed residential development without the need for mitigation.
c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building	<p>The ES Chapter 12 emphasises that noise mitigation measures and noise management plans will be put in place to ensure that demolition and construction noise is minimised at all times.</p> <p>With regard to fixed plant noise limits, the ES Chapter finds that the magnitude of impact of plant noise is a very low magnitude of impact resulted, which gives a negligible resultant effect and is not considered significant.</p> <p>The Chapter also provides a number of mitigation and enhancement measures to ensure sufficient levels of sound.</p>
Cumulative Impacts	
a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting	The accompanying HTVIA and Chapter 9 of the Environment Statement, which assesses the cumulative visual impact of the Proposed Development, provides a number of views with the Illustrative Masterplan impact shown. The HTVIA concludes that the impact of the Proposed Development would range from negligible to beneficial, thus improving the area's cumulative visual features.

9.155 With respect to WCC's City Plan, Policy 41 defines tall buildings as buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline. Further, the policy points to a criteria of general principles in part B for the appropriateness of tall building proposals, which is set out in the table below:

Table 18: Assessment of City Plan 2019-2040: Policy 41

City Plan 2019-2040: Policy 41	Illustrative Masterplan
1) be proportionate to the role, function and importance of the location in terms of height, scale, massing and form	The proposed scale and massing have been considered across the three Sites to create a harmonious streetscape with a degree of variation and localised points of modest height where appropriate. The heights on Site A are generally 9-11 storeys, and the proposals include up to 14 storeys on Site A and 12 storeys on Sites B and C. The design of the Proposed Development has been carefully considered and scrutinised during

	<p>the public consultation stage, which concluded that the proposed height, scale, massing and form are proportionate to the existing heights of the Site and will further strengthen its role, importance and function as a place.</p>
<p>2) achieve exceptional architectural quality and innovative and sustainable building design from all viewpoints and directions</p>	<p>For Site A, the Proposed Development uses brick as the predominant material because it will be the dominant material in the local area and is a low maintenance, attractive, robust, modestly priced material that gives a strong sense of solidity and weathers well in preserving a high-quality appearance for the long run. The brick will be in two colours: a red and a creamy-white, which echoes the use of red brick and creamy-white stucco on typical Westminster mansion blocks and also found in the adjacent frontage at 354-380 Edgware Road. Therefore, the architectural quality will be high and well-blended into the surrounding area.</p> <p>As stated above, the materials of the building are carefully designed to be sustainable, adaptable and durable.</p> <p>With regard to Sites B and C, the Design Code sets out high standards for materials that should be adopted for the Outline Area. The proposed architectural quality and material are in keeping with Site A design.</p>
<p>3) create 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</p>	<p>The Proposed Development will deliver a range of improvements to the Site in terms of streetscape, legibility, design and active uses at ground floor level. As set out above, the regeneration scheme will include a significant reconfiguration of the Class E floorspace to reinforce its role on ground floor level and support the activation of the uses on ground floor and at frontage of the Church Street.</p> <p>Public realm improvements such as a new pedestrianised street in Site A will improve the legibility of Site A.</p> <p>The proposed materials of red and creamy-white bricks will revitalise the design of the Site and make it a highly-attractive development.</p>
<p>4) enhance the character and distinctiveness of an area without negatively affecting valued townscapes and landscapes, or detracting from important landmarks, heritage assets, key views and other historic skylines and their settings</p>	<p>The HVTIA demonstrates that the Proposed Development would have a moderate and beneficial effect on Lisson Grove and minor and beneficial effect on A5 corridor, which are significant heritage assets, due to the Proposed Development's perimeter blocks reinstating the</p>



	<p>historic urban structure, improving pedestrian permeability and providing improvements to Church Street and its associated market.</p> <p>Furthermore, it notes that the introduction of mid-rise and taller buildings as part of the Proposed Development are not uncharacteristic in the particular context and it would only result in a small alteration of the character of the baseline townscape character.</p> <p>With regard to visual impact, the variation in the proposed buildings' façade material helps to break its perceived mass within the views; whilst the window openings and stacked balconies provide a vertical articulation and visual interest. The setbacks and varying storey heights aid in defining the top of the buildings and provide articulation. Further details regarding the townscape and visual effects are provided in the HVTIA.</p>
<p>5) mitigate negative impacts on the microclimate and amenity of the site and surrounding area</p>	<p>The ES Chapter 16 concludes that It is expected that the influence of the Proposed Development on wind conditions at the Site and in the immediate surrounding area will increase gradually as construction progresses from the Baseline scenario to reach a maximum equal to the influence of the complete operational development.</p> <p>The activity on-site during this time (i.e. construction activity) is less sensitive to wind conditions than when the Proposed Development is complete and operational (which would include new thoroughfare routes and building entrances, for example). In addition, there would be appropriate health and safety measures implemented to ensure that the construction workers were adequately protected. This would therefore represent a negligible effect (not significant) during the demolition and construction works of the Proposed Development.</p> <p>There will be mitigation measures against the risk of worsened wind conditions after the completion of the Proposed Development, which include ensuring that balustrades comprise at least 50% solid and 1.5m in height or alternatively, side screens at least 1.8m in height on the upwind side of the balcony locations. As a result of this mitigation measure, the ES Chapter concludes that the wind conditions throughout the Proposed Development would be suitable for the intended pedestrian usage.</p>

6) avoid unacceptable impacts on aviation and telecommunications	Aviation risks and telecommunication from the Proposed Development were scoped out as a risk as part of the Environmental Statement Scoping Opinion as they are not considered as an Environmental issue.
7) provide publicly accessible viewing platforms at the roof of the building (for any exceptionally tall buildings)	As the tallest building will be 14 storeys compared to taller buildings in the surrounding context, this criteria is not applicable to the Proposed Development.

9.156 In addition to the criteria above, Part C of the policy states that tall buildings may be acceptable in the Housing Renewal Areas, which the Site is located within, provided that the proposal complies with the general principles in Table 2.

9.157 Policy 42 of the City Plan also gives further guidance on building height in the Housing Renewal Areas. It acknowledges that delivering large-scale public estate regeneration comes with viability challenges that are different to private developments. The policy makes a reference to the general building height principles in Policy 41 Part B and emphasises that what is considered an appropriate height must be balanced against the wider public benefits the scheme is able to viably deliver. Furthermore, Part B of Policy 42 identifies the Church Street / Edgware Road Housing Renewal Area as an opportunity for renewal and taller buildings to be provided “*where they contribute to the creation of a place with a strong and enhanced character*”.

9.158 Considering WCC Policy 42 as set out above, the Proposed Development will provide buildings ranging up to 14 storeys in height. The proposed buildings will be of high architectural quality, sustainable and durable. The principle of tall buildings in this location is acceptable due to the existing precedent of tall buildings, well-connected infrastructure, high PTAL rating and location within an existing brownfield site and a Housing Renewal Area. Therefore, the proposals accord with the WCC City Plan in terms of policy requirements for tall buildings.

9.159 In addition to the above, the Proposed Development will provide wayfinding and improve the legibility of the surrounding townscape with significant benefits to the quality of the urban design principles and public realm on the Site without harm to designated heritage assets near the Site. The proposed tall buildings therefore meet the criteria of London Plan Policy D9 and WCC City Plan Policy 41.

Built Heritage, Townscape & Visual Impact Assessment

9.160 In terms of the NPPF, the key sections are Chapter 12 (Achieving well-designed places) and Chapter 16 (Conserving and enhancing the historic environment). In the latter chapter Paragraph 199 makes clear: “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the*

greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

- 9.161 Paragraph 200 states: “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification...”
- 9.162 Paragraph 202 also states: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”
- 9.163 Finally, paragraph 203 states: “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”
- 9.164 WCC’s Policy 38 sets out design principles, requiring exemplary standards of high quality, sustainable and inclusive urban design and architecture.
- 9.165 Policy 39 of the City Plan relates to Westminster’s heritage and how it will be valued and that development should optimise the positive role of the historic environment. Parts I and K specifically relate to the consideration of setting to listed buildings and to conservation areas.
- 9.166 Policy 40 of the City Plan relates to townscape and architecture, requiring development to be sensitively designed having regard to the surrounding townscape. Part C relates to extensive developments and indicates they should maximise opportunities to enhance the character, quality and functionality of the site and its surroundings, including creating new compositions and points of interest.
- 9.167 As noted, Policy 41 relates to tall buildings and sets out general design principles in circumstances where they might be acceptable; and Policy 42 specifically relates to building height in housing renewal areas and indicates that in these areas, which include the Church Street / Edgware Road, there are opportunities for taller buildings. The Church Street / Edgware Road Housing Renewal Area are at the main east-west route and the commercial focus for the area and have been identified as the place to be delivered in the heart of the regeneration scheme as part of a comprehensive approach.
- 9.168 In addition, the supporting text to this Policy at 42.1 says that prescriptively indicating appropriate heights in the area may “preclude the design solutions necessary to facilitate the comprehensive public benefits that large estate-wide development can deliver”, including the significant contribution to the strategic priority for more affordable housing in Westminster. Nonetheless, the supporting text makes it clear that this does not mean that the heights for housing renewal areas are limitless, and WCC officers will expect new buildings to be of an appropriate scale for their local context and the Applicant will demonstrate how the proposal adheres to Policy 41.
- 9.169 As noted above, the HTVIA concludes that the completion of the Proposed Development would create a local, permanent, long-term, medium magnitude of impact on the area on Lisson Grove, resulting in a

moderate and beneficial effect (significant) in accordance with the NPPF and WCC City Plan Policies 39, 40 and 41. This is due to the Proposed Development's perimeter blocks reinstating the historic urban structure, improving pedestrian permeability, and providing improvements to Church Street and its associated market in line with the design principles set out within the Church Street Masterplan document. Furthermore, high-quality design principles have been established in the Design Code with the considerations of inclusivity and sustainability and will be adopted for the whole Site, ensuring high-quality, inclusive, sustainable design buildings in accordance with WCC City Plan Policy 38.

9.170 The HTVIA demonstrates that the introduction of mid-rise and taller buildings as part of the Proposed Development are not uncharacteristic in the particular context and it would only result in a small alteration of the character of the baseline townscape character. The uses at ground floor would activate the Proposed Development's elevation and provide natural surveillance onto the surrounding streets, aligning with WCC City Plan Policy 40. The Proposed Scheme's A2 building is positioned within the A5 Corridor and it would have a local, direct, permanent, long term, low magnitude of impact. The building responds to the existing building line of Edgware Road and results in a minor and beneficial effect (not significant) to the area. In terms of visual receptor's representative views, the HTVIA notes that limited glimpsed views would be gained to the top of the taller buildings associated with the Proposed Development. Such buildings are not incongruous features within these views, in the context of Paddington. Any identified effects from these visual receptors are likely to not be significant in EIA terms and therefore not been tested as representative views.

Public Realm & Urban Greening

Public Realm

- 9.171 The NPPF recognises the importance of delivering places which promote the following:
- opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity;
 - safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
- 9.172 Paragraph 98 NPPF further states that access to high quality open spaces can make an important contribution to the health and wellbeing of communities.
- 9.173 London Plan Policy D9 states that the public realm should encourage active travel, discourage travel by car and on-street car parking. Also the public realm should be able to operate at different times of the day, be vibrant and ensure appropriate management is in place. Finally, the public realm should incorporate street trees and other vegetation to support sustainable drainage systems.

- 9.174 Policy 6 of the City Plan states sites located within the Church Street Housing Renewal Area should contribute to providing new green infrastructure and public realm improvements, including a north-south green route or 'green spine'.
- 9.175 Policy 43 of the City Plan notes development proposals should contribute a well-designed, clutter-free public realm with use of high quality and durable materials capable of easy maintenance and cleaning, and the integration of high-quality soft landscaping as part of the streetscape design. Further, Part B of the policy requires the public realm to be designed as safe, attractive, and accessible to all and contribute to improving connectivity, legibility, and permeability of the public realm. Part E of Policy 43 also encourage to provide high quality public arts as an integral part of the design.
- 9.176 The Site's existing public realm is sparse and has had issues of anti-social behaviour. However, the Site seeks to address that and significantly improve the public realm offer for existing and future residents that will create a vibrant area that will feel safe and inclusive through the day time and the night time.
- 9.177 As noted within the accompanying DAS, the public realm is at the heart of the design rational for the Proposed Development. Streets and parks have been shaped to enable access to high quality public amenity and open space for all. The proposals have designed to be green and healthy.
- 9.178 Across the Site there are numerous areas of green space both within and outside of the development. These spaces entrench Church Street Sites A, B, & C within the growing green network throughout the ward and provide ample space for residents of the scheme and local residents in the surrounding schemes and beyond to enjoy. This connection between Church Street and the surrounding developments strengthens the approach to not only green space but play space, open space, and community.
- 9.179 The landscape design within Church Street incorporates four key areas, Site A, Site B, Site C, and the public realm. The intent is to provide secure communal spaces for residents within the sites which allow a greater sense of security and privacy while providing spaces for growing, play, and socialising. The courtyards will be secure, overlooked, and only accessible by the residents. For the public realm the aim is to provide an updated public realm for the Church Street Market that is more aesthetically pleasing, more easily cleanable and more fit for use by the market traders, in accordance with City Plan Policy 43.
- 9.180 Focusing on Site A, Site A consists of 3 distinct spaces, and the proposals are based around the creation of a new publicly accessible space called the 'New Street Gardens' which is a new area of public realm that is pedestrian dominated and located away from highways land. The ground level courtyard and library garden encased within building A1 of Site A, which consists of secure communal play and seating spaces, private rear gardens and a public managed library garden that attaches directly onto the new Church Street Library, aligning with London Plan Policy D9 and WCC City Plan Policy 43. And finally a podium level secure communal courtyard which uses the same principles as the ground level courtyard. In quantum terms, Site A will deliver 2,478 sqm of new public open space, which amounts to 15.4% of the total proposed open space across the Site. All spaces are fully accessible in accordance with the NPPF.
- 9.181 With regard to active travel, walking and cycling will be encouraged. The public realm offers cycle parking. On Street parking is not proposed within the Proposed Development and no vehicle access is allowed

through New Street Gardens unless for emergency vehicles, in accordance with London Plan Policy D9. Further to this, active travel has been encouraged in the Church Street Ward and adjacent projects such as the Green Spine Project have put this into effect within their scheme in accordance with London Plan Policy D9.

- 9.182 In terms of Sustainable Drainage Strategy the public realm offers a large scale rainwater recycling system for the irrigation of trees and planting areas at podiums, biodiverse green roofs are proposed and blue roofs are proposed at podium level to accommodate run off from the podiums to contribute towards the Sustainable Drainage Strategy, aligning with London Plan Policy D9.
- 9.183 With regard to street art, the accompanying DAS explores the option of street art being incorporated into the public realm in accordance with Policy 43 of the City Plan.
- 9.184 Finally, the Green Spine has been incorporated into the overall Proposed Development, in accordance with City Plan Policy 6.

Healthy Streets

- 9.185 The London Plan Policy T2 sets out a 'Healthy Streets' approach to new development and requires proposals to demonstrate how it will deliver improvements by:
- 1) supporting the ten Healthy Streets Indicators in line with Transport for London guidance;
 - 2) reduce the dominance of vehicles on London's streets whether stationary or moving; and
 - 3) being permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 9.186 Part C (4) of Policy 24 of the City Plan requires the development to contribute to the London Plan's Healthy Streets approach to improve air quality, reduce congestion and make Westminster's diverse communities become greener, healthier and more attractive places in which to live, work or visit.
- 9.187 Transport for London's Healthy Streets for London (2017) and the Mayor's Transport Strategy (2018) both set out the indicators of Healthy Streets which are as follows:
- Pedestrians from all walks of life;
 - People choose to walk, cycle and use public transport;
 - Clean air;
 - People feel safe;
 - Easy to cross;

- Not too noisy;
- Places to stop and rest;
- Shade and shelter;
- People feel relaxed; and
- Things to see and do.

9.188 The Mayor's Transport Strategy notes that the Mayor, through TfL and the Local Planning Authority, will seek to make London a city where people choose to walk and cycle more often by improving street environments, making it easier for everyone to get around on foot and by cycle, and promoting the benefits of active travel.

9.189 The accompanying Transport Assessment set outs how the design of the Proposed Development, including its internal street network and how it ties in to the surrounding street network, which has evolved through consideration of the Healthy Streets principles. The Transport Assessment ('TA') establishes that the Proposed Development has been formulated in line with TfL's Healthy Street Indicators and the Mayor's Transport Strategy and notes that the proposals will look to meet the above indicators. It has been concluded in the TA that there are a number of significant amenities in proximity to the Proposed Development, such as cycle routes, public transport interchanges and Edgware Road, Paddington, and Marylebone Underground Stations.

9.190 In addition, the Active Travel Zone ('ATZ') Audit sets out each location where the healthy street indicators are not met and the suggestion on how the current situation can be improved or resolved. For example, introducing a pedestrian phase on demand with associated facilities including for partially sighted people and introducing barriers on the footway to prevent dangerous crossing forcing people to cross further up the side road which are in accordance with London Plan Policy TC2 and WCC City Plan Policy 24 in terms of providing a number of improvements to the existing streets. Further details of these improvements are set out in the TA. The audit offers an indicative analysis of what the wider Site is capable of delivering, and further details of the proposals for the Outline part of the Site will be confirmed in the Reserved Matters Application stage.

Play Space

9.191 London Plan Policy S4 Part B notes development should seek opportunities for play and informal recreation, which enable children and young people to be independently mobile. For residential development this should be in the form of at least 10 square metres of playspace per child. The playspace should be stimulating, can be accessed independently by children from the street, is integral with the neighbourhood, incorporates trees, is overlooked and is not segregated by tenure. The Proposed Development should also provide accessible routes to existing play provision and not result in the net loss of play provision.

- 9.192 Part D of Policy 34 of the City Plan requires a major development to provide new or improved public open space and space for children's active play, particularly in areas of open space or play space deficiency.
- 9.193 In accordance with the London Plan playspace requirements, the overall Proposed Development (Site A, B and C) would be expected to require 4,873sqm of playspace. The Proposed Development seeks to provide 5,664sqm of playspace. Thus providing a net additional over provision of 791sqm.
- 9.194 The playspace has been provided to accommodate a range of age groups including children aged under 5 years old, the playspace area will be 3,963 sqm which amounts to 27.8% of the whole playspace area across the Site, 1,701 sqm for children aged 5 to 11, and 8,570 sqm for children aged 12 and over. As such, the Proposed Development exceeds London Plan and City Plan Policy. The playspace strategy was developed following guidance from the GLA's 'Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance'. Essentially, the strategy will ensure that an adequate amount of playspace will be provided to meet requirements for all age groups and to further supplement provision, minor and inexpensive landscape interventions will be considered to encourage children to use nearby playspace provision, such as Broadley Street Gardens.
- 9.195 The strategy will enable the Applicant to better utilise the existing landscape space, which is currently underused by residents, and provide the entire playspace requirement within the site application boundary. As noted above, the provision of play space across the wider Site will exceed the London Plan's target requirements, and both formal and informal playable spaces/areas will be inclusive in design, both in ability and age range, in accordance with London Plan S4 and WCC City Plan Policy 34.

Biodiversity & Ecology

- 9.196 London Plan Policy G6 states proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and should be addressed throughout the development process.
- 9.197 Part G of Policy 34 of the City Plan states that developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats.
- 9.198 Accompanying this application, is a Biodiversity and Ecological Assessment. The Assessment concluded the Proposed Development provides multiple opportunities to enhance the biodiversity on Site such as the inclusion of bat and bird boxes, the creation of rain gardens, planting of a significant quantum of trees, and green roofs being proposed. As such the Proposed Development exceeds of London Plan Policy G6 and City Plan Policy 34.

Urban Greening Factor

- 9.199 London Plan Policy G5 states major development proposals (such as this) should contribute to the greening of London by including urban greening as a fundamental element of Site and building design,

and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage.

- 9.200 London Plan Policy requires boroughs that have not yet developed an Urban Greening Factor ('UGF') to set a UGF of 0.4 for developments that are predominately residential, but tailored to local circumstances.
- 9.201 The Draft GLA Guidance on Urban Greening Factor (March 2021) provides further guidance on integrating urban greening within the design process and how to undertake the calculation.
- 9.202 In accordance with the UGF Draft Guidance, the proposed development would be classified as residential and thus the target is set at 0.4. Focusing on Site A, the Proposed Development would achieve a score 0.437 thus exceeding the proposed target. Site A includes measures such as extensive green roof, biodiverse meadow, and permeable paving.
- 9.203 Focusing on the outline elements (Site B and C), the Applicant has made a commitment to achieving 0.4 or above when future phases are brought forward as RMA. As such the Proposed Development at all phases exceeds the London Plan Policy requirement.

Transport

- 9.204 Paragraph 104 of the NPPF requires new developments to consider local transport capacity and promote sustainable transport choices. The London Plan promotes development that will not adversely affect safety on the transport network. The London Plan sets out the following:
- Policy T5 seeks secure cycle parking in line with the standards set out in Table 10.2 of the London Plan;
 - Policy T2 seeks high quality pedestrian environments; and
 - Policy T6.4 states the maximum standards for car parking should be achieved and that 1 in 5 spaces should provide an electrical charging point.

Access, Circulation & Highways

- 9.205 Section 9 in the NPPF sets out the importance of developments encouraging and facilitating an increase in the use of and access to sustainable transport methods.
- 9.206 London Plan Policy T1 sets out that development proposals should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes. Any impacts on London's transport networks and supporting infrastructure should be mitigated.
- 9.207 WCC City Plan Policy 28 states that the Council will resist the loss of highway land, particularly footways due to increasing demands on existing highway space. New highway accesses should minimise the amount of footway, cycling space, and kerb space lost for parking and / or servicing and should ensure no loss of street furniture.

- 9.208 In addition, WCC City Plan Policy 28 seeks to ensure that the proposed access is not in proximity to road junctions and that the provision of access does not adversely affect the safety and free flow of traffic and pedestrians, including through provision of adequate visibility splays.
- 9.209 Construction vehicle routes to site will seek to minimise impact on the local road network and community. Wherever possible routes will avoid local schools and where this is not possible time restrictions will be put in place to avoid school start and finish times in accordance with London Plan Policy T1.
- 9.210 In terms of vehicular and pedestrian access, the TA sets out that there will be a measure to clearly identify pedestrian/vehicular access and establish around the entire site perimeter, with particular attention to the Church Street Market Infrastructure. This will accord with WCC City Plan Policy 28 in terms of promoting safety and ensuring free flow of traffic and pedestrians around the Site without causing any significant impact on these.
- 9.211 In accordance with the London Plan and WCC City Plan, the Proposed Development seeks to reduce the impact of operational vehicular demand on the local highway network. As such while the number of servicing and delivery trips expected from Site are low, the design of Site A has included provision of a parcel consolidation centre in proximity to the concierge facility and cores. This will enable the parcel delivery companies to send their courier vehicles to one particular location rather than vehicles trying to traverse through the local highway network finding the right address.
- 9.212 As noted above, the Site has good provision and accessibility to the pedestrian network – along Church Street, there is footway along both sides, is well lit and operates as a pedestrianised zone on Friday and Saturday. The A5 Edgware Road has footways along both sides, approximately 4.5m wide and the road is well lit; the junction of Church Street and Edgware Road is signalised with pedestrian crossing facilities provided on all arms. Therefore, the Proposed Development will align with WCC City Plan Policy 28 in terms of retaining footways.

Car Parking

- 9.213 At the national level, the NPPF sets out the Governments aspiration to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, focusing development in locations which are sustainable and accessible.
- 9.214 London Plan Policy T6 states that development proposals should adhere to the maximum standards established in the Plan London Plan Policy T6.1. Table 10.3 of the London Plan, targets car free development in areas of PTAL 5-6. At Part G, the policy states that disabled person parking should be provided in major developments where for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset. This is subject to the appropriate amount of wheelchair accessible spaces being provided as set out in Policy T6.1.
- 9.215 For residential development, Policy T6.1 requires parking for disabled persons to be provided at 3% of the total dwellings from the outset, and requires developments to demonstrate how an additional 7% of the total dwellings could be provided in the future subject to demand. Policy 6.1 also requires at least 20% of

any car parking spaces to be provided with electric vehicle charging facilities from the outset, with passive provision provided for all remaining spaces.

9.216 According to Policy 27, the parking standards in the London Plan will apply to all developments in Westminster. All new parking spaces should provide active provision for electric charging vehicles. Part B notes that where on-site parking is delivered, the Applicant will:

- 1) provide car club membership for all residents and provision of car club spaces;
- 2) ensure that all outdoor and open parking areas are designed to a standard which accommodates the need for safe pedestrian and vehicle movement and creates permeable links through the site;
- 3) prioritise the issue of parking spaces within development to families with young children; and
- 4) let, rather than sell, parking spaces to residents of new developments on a short-term basis, with spaces allocated to individual addresses or property numbers.

9.217 When considering parking impacts, WCC will prioritise alternative kerbside uses (such as car club spaces, cycle parking, and electric vehicle charge points) ahead of parking for private vehicles, and for a major development, the policy also states that contributions will be required for on-street of electric vehicle and other low emission vehicle infrastructure.

9.218 Part F of Policy 27 notes on housing renewal schemes, parking provision may be retained or re-provided where it can be demonstrated that existing occupiers with established parking spaces or permits are to return to the site once the development is completed and that the retained or re-provided parking is for those residents. Also, there should be evidence of adequate capacity within the relevant controlled parking zone if the re-provided parking is to be on-street, and the retained or re-provided parking is delivered as part of an overall package of measures improving legibility, including walking and cycling routes, and making improvements to the public realm. Paragraph 27.17 says that housing renewal schemes will be expected to attain an overall reduction in car parking provision over time.

9.219 The majority of the residential units in Site A are proposed to be car-free, with the exception of wheelchair accessible units and a small proportion of private units in accordance with London Plan Policy T6. Further to this, Site A will seek to provide 22 residential disabled parking spaces on-site, which amounts to 5% of number of units and 21 standard residential car parking spaces. The residential car parking spaces are to be provided within the basement of Site A and accessible via 2 car lifts situated on Penfold Street. Therefore, London Plan Policy T6 is met in terms of providing car-free development in the Site and 5% disabled car parking spaces.

9.220 With regard to electric charging vehicle points, of the 43 car parking spaces, 22 spaces should have active provision and the remaining 21 spaces will provide passive provision for future use as set out in the TA, aligning with London Plan Policy T6.

9.221 The development proposals includes provision of lifetime membership for car clubs for all residential units in accordance with WCC City Plan Policy 27. The TA notes that there are car clubs present in the vicinity

of the site; however, if on discussions with the Car Club operator, it is identified that any additional spaces would be required, then suitable locations will be identified in liaison with WCC highways.

Cycle Parking

- 9.222 London Plan Policy T5 states that developments should provide cycle parking in accordance with the minimum standards set out at Table 10.2 of the London Plan. The policy goes on to state that such parking should be designed and laid out in accordance with the London Cycling Design Standards, and that development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycle for disabled people.
- 9.223 Policy 25 of the City Plan Part D requires a major development to meet the cycle parking and cycle facilities standards in the London Plan. It goes on to state that where it is not possible to provide suitable short-stay cycle parking off the public highway an appropriate on-street location “should be considered provided it does not conflict with improvements to and the quality of the public realm”.
- 9.224 The proposed cycle provision for Site A is illustrated below.

Table 19: Proposed Cycle Parking Provision for Site A

No. of Beds	Long Stay		Short Stay	
	Minimum Standards per Unit	Proposed Provision	Minimum Standards	Proposed Provision
Studio	1 space	11	1 space per 40 units	0
1	1.5 spaces	257		4
2	2 spaces	276		3
3	2 spaces	120		2
4	2 spaces	22		0
5	2 spaces	4		0
Total		690	Total	10

- 9.225 It is proposed that the cycle parking will be providing in mix of Sheffield stands, double stacker stands, accessible spaces, and cycle lockers for folding bikes. The cycle parking is located in proximity to communal residential entrances but set back within the Sites to minimise the impact on the active frontages. Cycle stores will be provided on the ground floor and basement level, which are secure in line with London Plan T5.

- 9.226 The detailed design of Sites B and C will be finalised at the Reserved Matters stage, and the detailed design will follow the principles laid out for Site A. The designs will incorporate policy compliant cycle parking, disabled vehicle parking, and further facilities for the Church Street Market Infrastructure, thus aligning with London Plan Policy T5 and WCC City Plan Policy 25.

Servicing & Deliveries

- 9.227 London Plan Policy T7 Part G requires Proposed Development to facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and in a way which reflects the scale and complexities of the development.
- 9.228 The London Freight and Servicing Action Plan sets out the requirements for new development to produce Delivery and Servicing Plans which should aim to reduce delivery trips, increase loading bay availability, and use safe and legal loading facilities.
- 9.229 Policy 29 says that WCC supports the provision of consolidated facilities for freight, servicing, and deliveries in new development in accordance with the London Plan. The net loss of existing off-street facilities will be resisted. The Policy notes provision for servicing, collection, and deliveries within developments should be located behind new or converted buildings, or below street level, be appropriate in size, type, and anticipated frequency of arrival of vehicle and capable of being shared with other businesses.
- 9.230 Part D goes on to say that where it is not possible to fully meet the servicing, collection, and delivery needs within a development site, “they must be met in such a way that minimises adverse effects on other highway and public realm users, and other residential or commercial activity.” However, Policy 25 prioritises the pedestrian environment, thus on-street servicing needs to be balanced against the safety of pedestrians, which is also noted in Paragraph 29.7. This paragraph says that if servicing is to be undertaken on street, “it must be demonstrated that it would not lead to adverse safety implications, for pedestrians and / or vehicles, or the obstruction of traffic”.
- 9.231 The Transport Assessment sets out that on Site A, the Proposed Development will reduce the impact of operational vehicular demand on the local highway network in accordance with London Plan Policy T7 and WCC City Plan Policy 29. As such, while the number of servicing and delivery trips expected from Site are low, the design of Site A has included provision of a parcel consolidation centre in proximity to the concierge facility and cores. This will enable the parcel delivery companies to send their courier vehicles to one particular location rather than vehicles trying to traverse through the local highway network finding the right address. The Estate Managers of Site A will manage the parcel consolidation centre which will have a generic address. The residents will be informed as part of their lease agreements that their parcel should be addressed to the said address, but for the attention of the residents’ name. Furthermore, the residents will have the flexibility to not be present during the parcel delivery. As such this will enable the parcel delivery firms to consolidate their deliveries to the Sites and for delivery to take place throughout the day distributing the impact of the servicing trips rather than concentrating them over the peak periods.

The residents will also be given the option of having their parcel stored for up to two days, unless previously agreed.

- 9.232 As noted above, WCC City Plan Policy 29 seeks to reduce the impact of the development on the surrounding streets, in particular impacts arising due to deliver and servicing trips. In accordance with this policy, the Proposed Development will seek to provide consolidated facilities for servicing and deliveries, which also accords with London Plan Policy T1. WCC City Plan Policy 29 further stresses that the net loss of existing off-street facilities will be resisted. As such the development proposals aim at no or reduced net loss of on-street parking and residential amenity, in accordance with Policy 29.

Network Impacts

- 9.233 London Plan Policy T4 states Proposed Development should reflect and be integrated with current and planned transport access, capacity and connectivity. Part B of Policy T4 development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 9.234 In accordance with London Plan Policy T4, the Transport Assessment concludes that the proposed modal shift away from the private car as well as the increased number of residents will increase patronage on the sustainable travel modes from the local transport hubs for bus, underground and train. An impact assessment has been undertaken for each of these modes. Considering a worst case, it revealed the 274 bus would experience the highest uplift in patronage, 5 additional passengers per bus in the AM peak and 4 in the PM peak. With regard to underground patronage at Edgware Road Station, it was revealed there would be an additional 1,133 two-way daily trips split across the two parts of the Station. In terms of overground train usage, Paddington would experience 190 additional two-way trips per day and Marylebone 39. It can thus be concluded that the local public transport network would not experience an excessive uplift in usage that would facilitate any further consideration.
- 9.235 For Site A, the public transport impacts were demonstrated that there will be a net decrease of approximately 24 two-way underground, metro, light rail, tram, train, bus, minibus or coach trips during the AM peak, and 16 trips during the PM peak as a result of the Proposed Development for Site A. Furthermore, the Assessment indicates that the Proposed Development will generate an additional 208 person trips in the AM peak and an additional 138 person trips in the PM peak in comparison to the existing trip generation. Public transport active travel modes (walking and cycling) trips contribute 88% of the modal split, demonstrating that the proposed development will generate less reliance on the private car vehicle.
- 9.236 The proposed parking ratio for Site A (0.10) is lower than the existing car ownership levels. Notwithstanding, the Proposed Development for Site A is expected to generate a net total of 19 two-way vehicular trips in the AM peak and 12 two-way vehicular trips in the PM peak. The Proposed Development is proposed to include two car-lifts to take vehicles from street level to the basement car park in accordance with London Plan Policy T4. Whilst there may be some overlap of vehicles entering/leaving and vehicles waiting, the proposed car lifts are sufficient for the proposed number of vehicular trips and minimal impact is expected to the pedestrian environment and on Penfold Street, aligning with Policy T4 of London Plan.
- 9.237 Further details are set out within the accompanying Transport Assessment.

Climate Change, Energy & Sustainability

Heat, Energy and Carbon Emissions

- 9.238 The London Plan Policy S12 requires a zero-carbon target for the residential element of all major developments. ItP London Plan Policies S12 and S13 further require new developments to minimise carbon dioxide emissions to the fullest extent possible in line with the GLA's Energy Hierarchy (Be Lean, Be Clean, Be Green).
- 9.239 London Plan Policy S11 states that major developments should achieve a net-zero carbon, with a minimum on-site reduction of at least 35%.
- 9.240 Policy 36 (B) of the City Plan states that all development proposals should follow the principles of the Mayor of London's energy hierarchy. Major development should be net zero carbon and demonstrate through an energy strategy how this target can be achieved. With respect to heat networks, the Part D of the policy says that developments should be designed in accordance with the Mayor of London's heating hierarchy, and major developments must connect to existing or planned local heat networks, or establish a new network, wherever feasible.
- 9.241 The Energy Assessment accompanying this Application shows that at least 35% of the reductions beyond the minimum requirements of Part L 2013 of the Building Regulations are achieved on site, and shortfall to achieve zero-carbon emissions is met through a cash-in-lieu contribution, meeting London Plan Policies S11 and S12. In achieving CO₂ reductions, a series of measures have been adopted incorporating the four-step energy hierarchy comprising of Be Lean, Be Clean, Be Green and Be Seen measures. This aligns with London Plan Policy S12 in terms of adopting the GLA's Energy Hierarchy.
- 9.242 The Energy Assessment sets out that a previously planned district heating network for the Church Street area in WCC's energy masterplan has been considered no longer viable by the Council. Therefore, there are no identified opportunities to connect to an existing or planned heat networks in the area and use of combined heat and power was considered unviable. However, a building level heat network designed to reduce distribution losses is proposed with provision to connect to a future area-wide district heating network or a site-wide heating network (incorporating low-carbon technologies that may be available at the time of later phases) as the Site evolves across the phasing program, which is considered to accord with Policy 36 of the WCC City Plan.

Overheating

- 9.243 Paragraph 153 of the NPPF states "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support have appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure".

- 9.244 London Plan Policy SI3 requires major development should follow following cooling hierarchy:
- reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
 - minimise internal heat generation through energy efficient design;
 - manage the heat within the building through exposed internal thermal mass and high ceilings;
 - provide passive ventilation;
 - provide mechanical ventilation; and
 - provide active cooling systems.
- 9.245 Part E of Policy 36 of the City Plan 2019-2040 states that all developments should be designed and operated to minimise the risk of internal overheating. Major development proposals will be required to include a cooling strategy in line with the Mayor of London's cooling hierarchy.
- 9.246 The building within has been designed in accordance with the London Plan Policy SI4 to minimise impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 9.247 The Proposed Development has been designed to mitigate overheating risk, reducing the potential for internal overheating and reducing the reliance on air conditioning by following the cooling hierarchy set out in London Plan Policy SI3. The building form helps to mitigate overheating risk, with self-shading, overhanging balconies, fully openable bi-fold windows, deep window reveals and solar control glass reducing solar gains entering internal spaces. The use of low temperature ambient loop heat network avoids unwanted heat gains. All dwellings are dual aspect maximising passive ventilation. Due to the high external noise levels from the adjacent Edgware Road, natural ventilation is not possible for some dwellings, thus cooling is required to some dwellings. The viability of the scheme relies on increased sales values by including cooling to private sale dwellings, and to meet the brief requirement for the scheme to be tenure blind, cooling is provided to all dwellings. In conclusion, these proposals will minimise the risk of internal overheating and thus are in accordance with WCC City Plan Policy 36 and London Plan Policy SI3.
- 9.248 A detailed overheating risk analysis has been carried out for the development undertaking dynamic overheating modelling in accordance with CIBSE TM59, and the report containing modelling inputs, assumptions and results can be found appended to the Energy Assessment prepared as part of this planning application.

Sustainability

- 9.249 The concept of 'Good Growth' underpins the London Plan and ensures that it is focused on sustainable development. 'Good Growth' – growth that is socially and economically inclusive and environmentally

sustainable – underpins the whole of the London Plan. Six Good Growth objectives are identified, GG1 Building strong and inclusive communities, GG2 Making the best use of land, GG3 Creating a healthy city, GG5 Growing a good economy, and GG6 Increasing efficiency and resilience.

9.250 Sustainable design has been noted in Part D of WCC's Policy 38, saying that the development will be expected to enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design:

- 1) use of high-quality durable materials and detail;
- 2) providing flexible, high quality floorspace;
- 3) optimising resource and water efficiency;
- 4) enabling the incorporation of, or connection to, future services or facilities; and
- 5) minimising the need for plant and machinery.

9.251 WCC have declared a climate emergency, which is a commitment to becoming a carbon neutral council by 2030 and carbon neutral city by 2040. This declaration calls for urgent action to limit global warming to a maximum of 1.5° Celsius, to avoid adverse impacts of climate change. In addition, WCC's Climate Emergency Declaration says that Westminster has some of the highest carbon emissions and suffers from air pollution, with the Council emissions accounting for only 2% of emissions, with 71% from non-domestic buildings, 15% from homes, and 11% from transport. The declaration emphasises the importance of embedding sustainability into design principles of the Proposed Development so that residents in the Site are able to live in a sustainable place that contributes toward carbon neutrality by 2030.

9.252 A climate change risk adaption strategy has been adopted, which includes applying the cooling hierarchy to minimise the risk of overheating. This is achieved through an ambient loop system, which has minimal heat loss (and therefore minimal unwanted heat gains in summer) when compared to a standard communal heat network. Furthermore, external shading around windows and the use of overhanging balconies provide shading to the dwellings; 100% of dwellings are dual aspect, allowing higher levels of natural ventilation through opening windows compared to single-sided ventilation, in accordance with WCC's Policy 38 in terms of sustainable design.

9.253 The surface water drainage strategy has been developed using best practice and utilising a combination of SuDS, including biodiverse green roofs, blue roofs, permeable/porous pavement and geo-cellular storage tanks. As a result, surface water discharge rates will be restricted to 1.5-2.0l/s per connection. This accords with WCC Policy 38 where the Proposed Development is optimising resource and water efficiency and designed to mitigate the risk of surface water flooding for all storms up to the 1 in 100 (1%) annual probability plus allowance for 40% climate change, ensuring resilience against the adverse effects of climate change in the long run. Further to this, the Proposed Development will also apply the 'Drainage Hierarchy' which includes a number of SuDS measures such as self-infiltrating permeable surfaces, blue podium roof and below underground attenuation tanks to improve the resilience of the Proposed Development against climate change and improve its sustainability. Water butts will be provided on the

communal gardens at podium level of Sites A, B and C for irrigation of the soft landscape areas at the communal courtyards, in accordance with the ambition of Policy 38 of the WCC City Plan.

- 9.254 The Proposed Development will prioritise walking and cycling and minimising and managing trips by motorised vehicles by ensuring the majority of the proposed residential units in Site A are car-free with the exception of wheelchair accessible units (no.22) and additional 21 parking spaces. This helps the effort of reducing air pollution and improving air quality in accordance with the WCC's declaration of climate emergency. Having said this, the proposals stated above will also align with the WCC's declaration of climate emergency in terms of improving resilience against the impacts of climate change such as flooding and overheating.

Circular Economy & Whole-Life Carbon Assessment

- 9.255 London Plan Policy SI7 requires developments to resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal shall be achieved. Major applications should promote circular economy outcomes and aim to be net zero-waste.
- 9.256 In support of Policy SI7, the GLA's GLA Circular Economy Statement Guidance & Primer SPD (2020) states projects shall demonstrate how their development, including any public realm and supporting infrastructure, will incorporate circular economy measures into all aspects of the design, construction and operation process. Projects shall ensure that their designs:
- Consider strategies to facilitate the transition towards a circular built environment;
 - Recognise opportunities to benefit from greater efficiencies that can help to save resources, materials, and money; and
 - Report against targets that will facilitate monitoring of waste and recycling.
- 9.257 London Plan Policy SI2 requires major development to undertake a Whole-Life Carbon assessment. Part F of the policy says that development proposals referable to the Mayor should calculate whole lifecycle carbon emissions and demonstrate actions taken to reduce life-cycle carbon emissions.
- 9.258 City Plan Policy 37 promotes the Circular Economy and will ensure the development to contribute to the London Plan targets for recycling and for London's net self-sufficiency by 2026. Part C of this policy requires developers to demonstrate through a Circular Economy Statement in accordance with London Plan targets and the Council's Code of Construction Practice.
- 9.259 Accompanying this Application is a Circular Economy Statement and Whole Life Carbon Assessment that sets commitments, goals and strategic approach to the Proposed Development that align with the Circular Economy Principals. The commitments, goals and strategic approach are split between conserving resources, design to eliminate waste, managing waste and bill of quantities, in accordance with London Plan Policies SI2 and SI7 and City Plan Policy 37.

Other Environmental Matters

Air Quality

- 9.260 London Plan Policy SI1 requires Proposed Development to not lead to further deterioration of existing poor air quality or create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limit and create unacceptable risk of high levels of exposure to poor air quality. In order to achieve this, Proposed Development must be at least air quality neutral and be accompanied by an Air Quality Assessment. The Proposed Development should demonstrate how proposals have considered ways to maximise benefits to local air quality, and what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.
- 9.261 WCC is committed to improving air quality in the city and expects the development to reduce exposure to poor air quality and maximise opportunities to improve it locally without detriment of air quality in other areas, set out in Policy 32. Part C of this policy states that major developments in Housing Renewal Areas and those subject to an Environmental Impact Assessment must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach. Part D of the policy requires an Air Quality Assessment for a major development or within an Air Quality Focus Area, both of which the Site is situated within.
- 9.262 Chapter 9 of the ES concludes that with mitigation in place the construction impacts would be not significant on the area during construction. These mitigation measures include xxx, aligning with London Plan Policy SI1 and WCC City Plan Policy 32. Furthermore, the impacts of road traffic during the operational phase of the Proposed Development have been assessed and it has been concluded in the ES Chapter that there will be a reduction of traffic expected as a result of the Proposed Development and that there are no predicted exceedances of the NO₂, PM₁₀, and PM_{2.5} air quality strategy objectives at any of the new residential units within the Site during 2026 (with Site A completed) and 2035 (with all Sites completed). Therefore, the Site is considered suitable for the proposed residential development without the need for mitigation in accordance with London Plan Policy SI1 and WCC City Plan Policy 32.
- 9.263 In addition to the above, the air quality neutral assessment within the ES Chapter concluded that the transport and building emissions are well below the benchmark for NO_x and PM₁₀ and therefore the Proposed Scheme can be considered 'air quality neutral', meeting the requirements of the London Plan.

Noise & Vibration

- 9.264 To avoid and mitigate adverse noise effects on health arising from and impacting on new development, the NPPF makes reference to the Noise Policy Statement for England ('NPSE'). The NPSE was published in March 2010 and covers all forms of noise other than occupational noise. This document and the accompanying notes sets out three concepts by which to assess the adverse impacts of noise, including:
- No Observed Effect Level;
 - Lowest Observed Adverse Effect Level; and

- Significant Observed Adverse Effect Level.

9.265 London Plan Policy D14 requires Proposed Development to avoid significant adverse noise impacts on health and quality of life by reflecting the Agent of Change Principals and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses. Also, separating new noise-sensitive development from major noise sources promoting new technologies and improved practices to reduce noise at source.

9.266 Policy 33 Part C of the City Plan notes that “*development should prevent adverse effects of noise and vibration and improve the noise environment in compliance with the Council’s Noise Thresholds, with particular attention to:*

- 1) *minimising noise impacts and preventing noise intrusion to residential developments and sensitive uses;*
- 2) *minimising noise from plant machinery and internal activities;*
- 3) *minimising noise from servicing and deliveries; and*
- 4) *protecting the relative tranquillity in and around open spaces.”*

9.267 Accompanying this Application is an Acoustic Assessment, the Assessment indicates that the detailed element of the Application (Site A) has good internal noise conditions can be provided to flats at all times, and the site is suitable for the proposed use in accordance with London Plan Policy D14 and City Plan Policy 33.

9.268 Additionally, the accompanying ES Chapter 12 sets out that the changes in operational traffic associated with the Proposed Development after the completion of the development give rise to residual effects ranging from minor beneficial and negligible adverse. The long-term environmental impact is considered not significant, however. The noise emission from fixed plant associated with the Proposed Development represents residual effects of negligible adverse rating. During the construction and demolition, there will be a series of mitigation measures to minimise noise and vibration effects on nearby noise-sensitive receptors, including ensuring appropriate hours of work, adoption of appropriate noise control targets and monitoring where required, and use of low-impact techniques, such as demolition munchers and bored or hydraulically jacked piling rigs. Therefore, it is considered that the Proposed Development is in accordance with London Plan Policy D14 and City Plan Policy 33.

Wind & Microclimate

9.269 London Plan Policy D8 requires public realm to ensure that appropriate shade, shelter, seating and, where possible, with other microclimatic considerations, including wind, taken into account in order to encourage people to spend time in a place.

- 9.270 City Plan Policy 41 Part B (5) notes that the proposals for tall buildings must mitigate negative impacts on the microclimate and amenity of the site and surrounding areas.
- 9.271 As stated in the Chapter 16 of the ES, the Proposed Development would cause a gradual increase in wind conditions at the Site as construction progresses. The activity on-site during this time (i.e. construction activity) is less sensitive to wind conditions due to protection from site hoarding, and Site access being restricted to Site workers than the Proposed Development is complete and operational (which would include new thoroughfare routes and building entrances, for example). In addition, there would be appropriate health and safety measures implemented to ensure that the construction workers were adequately protected in accordance with WCC City Plan Policy 41. This would therefore represent a negligible effect (not significant) during the demolition and construction works of the Proposed Development.
- 9.272 Regarding London Plan Policy D8, the ES Chapter concludes that on-site entrances currently have wind conditions suitable for sitting and standing use during the windiest season; off-site entrances between 340 Edgware Road and 352 Edgware Road have strolling use wind conditions during the windiest season. All other off-site entrances have sitting and standing use wind condition during the windiest season. With regard to ground level amenity, wind conditions in Broadley Street Gardens are found to be suitable for sitting and standing use during the summer season. Therefore, it is considered that the existing conditions of public realm will be suitable for standing and sitting during windy conditions, and the Proposed Development will further enhance the public realm over the course of the scheme in accordance with London Plan Policy D8.

Daylight & Sunlight

- 9.273 Paragraph 125(c) of the NPPF directs when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 9.274 Policy D6 of the London Plan states the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.
- 9.275 WCC refer to the standards for daylight and sunlight as set out in the Building Research Establishment 'Site layout planning for daylight and sunlight: a guide to good practice' (as revised 2011) (BRE Guidelines), albeit recognising that these Guidelines should be applied flexibly.
- 9.276 In addition, City Plan Policy 7 requires the development to be 'neighbourly' by protecting and where appropriate enhancing amenity, by preventing unacceptable impacts in terms of daylight and sunlight, sense of enclosure, overshadowing, privacy and overlooking.
- 9.277 Accompanying this application is a Daylight and Sunlight Assessment which goes through the proposed development in detail.

- 9.278 Focusing on the detailed element (Site A), all units proposed are dual aspect and are a good sized. In accordance with London Plan Policy D6, this will ensure every unit will receive a suitable quality of sunlight and daylight. The proposed internal layouts, a clear hierarchy was defined to place living areas in locations with the highest availability of daylight and sunlight, as this is where the occupants are mostly going to spend their time and therefore have higher daylight expectations. To this end, balconies were located above bedrooms wherever possible, whilst kitchens were set to the rear end of the Living/Kitchen/Dining Rooms (LKDs). These and other design strategies resulted in a scheme which makes the most out of the site's available daylight and sunlight. However, taking into consideration the Site is located in inner Central London and as such, the parameters suggested by the BRE guidelines, must be applied flexibly which is corroborated in the Mayors Housing SPG (2016).
- 9.279 For daylight this results in 784 out of the 1177 habitable rooms tested (67%) meet or exceed the BRE recommendation for daylight quantum (ADF) and 55% achieve the recommended level for sky visibility (NSL). Although noting a further 37 living/kitchen/dining rooms achieve the recommendation of 1.5% ADF for living areas. Therefore, should these rooms be considered acceptable, it would be concluded that 822 out of the 1177 (70%) of all habitable rooms tested will offer future occupants good levels of daylight.
- 9.280 Where habitable rooms see lower levels of daylight, the rooms either see at least 1 % ADF, which is the minimum recommendation for bedrooms and meet the sky visibility, have a good view of the sky for at least half of the room area or are located in the more challenging areas of the proposed development but have good sky visibility within half of their area. Additionally, where there is a low performing room in daylight terms, the units are generous sized and provide private external amenity space in the form of projecting balconies that limit the daylight into rooms. This balancing act is common within Central London development and the increased daylight and sunlight would have been at the expense of other important design considerations/viability
- 9.281 With regard to overshadowing, public realm between Blocks A1 and A2, the courtyard of Block A1 and the open space within Block A2 were tested for sunlight availability. Overall, the proposed masterplan provides a variety of amenity spaces with different degrees of sunlight and shading. The design has ensured that occupants of all residential blocks will have access to well sunlit outdoor spaces throughout the year
- 9.282 Focusing on the outline elements (Site B and C), the proposed layouts are to be developed and approved at future RMAs will include a number of mitigations aimed at optimising the available daylight and sunlight. As detailed layouts are not included in an outline application, this report will inform the architects decisions at the next design stages in respect to the internal daylight and sunlight quality. These can be further maximised through iterative detailed design development of any RMA for the respective plots, and through the commitments made as part of the Design Code and with reference to the recommendations in the BRE Guidelines.
- 9.283 Focusing on the overshadowing impact on the outline elements, during the summer period the sunlight availability within Sites B and C is considered is good and all areas within Sites B and C acceptable sunlight levels.
- 9.284 With regard to the proposed development impacts on the existing context a comprehensive Daylight, Sunlight and Overshadowing Assessment has been prepared by GIA which is set out in Chapter 11 of the

accompanying Environmental Statement and this should be read in conjunction with the accompanying Contextual Report proposed by GIA. The Contextual Report outlines that retained levels of daylight and sunlight are similar to the levels of daylight at comparable residential sites in the vicinity and are prevalent in this part of London. By comparing the retained daylight levels arising from the Proposed Development, it is demonstrated that they are not out of character with what exists in the surrounding context.

Flood Risk & Drainage

- 9.285 Paragraph 161 of the NPPF requires a sequential test to be applied risk-based approach to the location of development – taking into account the current and future impacts of climate change.
- 9.286 London Plan Policy SI12 state development proposed should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- 9.287 London Plan Policy SI13 state Proposed Development should utilise sustainable urban drainage systems ('SuDS') unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 9.288 It is noted within the London Plan Policies this could be achieved through rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation), rainwater infiltration to ground at or close to source, rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens), rainwater discharge direct to a watercourse (unless not appropriate), controlled rainwater discharge to a surface water sewer or drain and controlled rainwater discharge to a combined sewer. The Policies also add that development proposed for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.
- 9.289 Policy 35 of the City Plan 2019-2040 states that all developments should be safe for their lifetime from the risk of flooding, complying with the Council's Strategic Flood Risk Assessment, Surface Water Management Plan, Local Flood Risk Management Strategy, and the Mayor of London's Regional Flood Risk Appraisal. It goes on to say that a site-specific Flood Risk Assessment must be submitted if the development is of 1 hectare or greater, within Flood Zones 2 and 3, and within a Surface Water Flood Risk Hotspot. Regarding flood management infrastructure, Part G notes that all existing flood management infrastructure will be protected, including access for maintenance. Part H will ensure that improvements to flood defences are secured through planning conditions and / or legal agreements where the size, type and / or location of development impacts on flood risk. Furthermore, the development should not limit future raising of flood defences outlined in the Thames Estuary 2100 Plan.
- 9.290 Accompanying this Application is the Flood Risk Assessment ('FRA'), which outlines the risk of flooding from all sources as well as the steps taken to mitigate against the risk of flooding on the site-wide basis and sets out principles to be followed for detailed design of the future developments within the Site boundary. The FRA establishes that the majority of the Site is at a 'Very Low' risk of surface water flooding, which indicates lower than 1 in 1,000 annual probability ('AP') rainfall event.

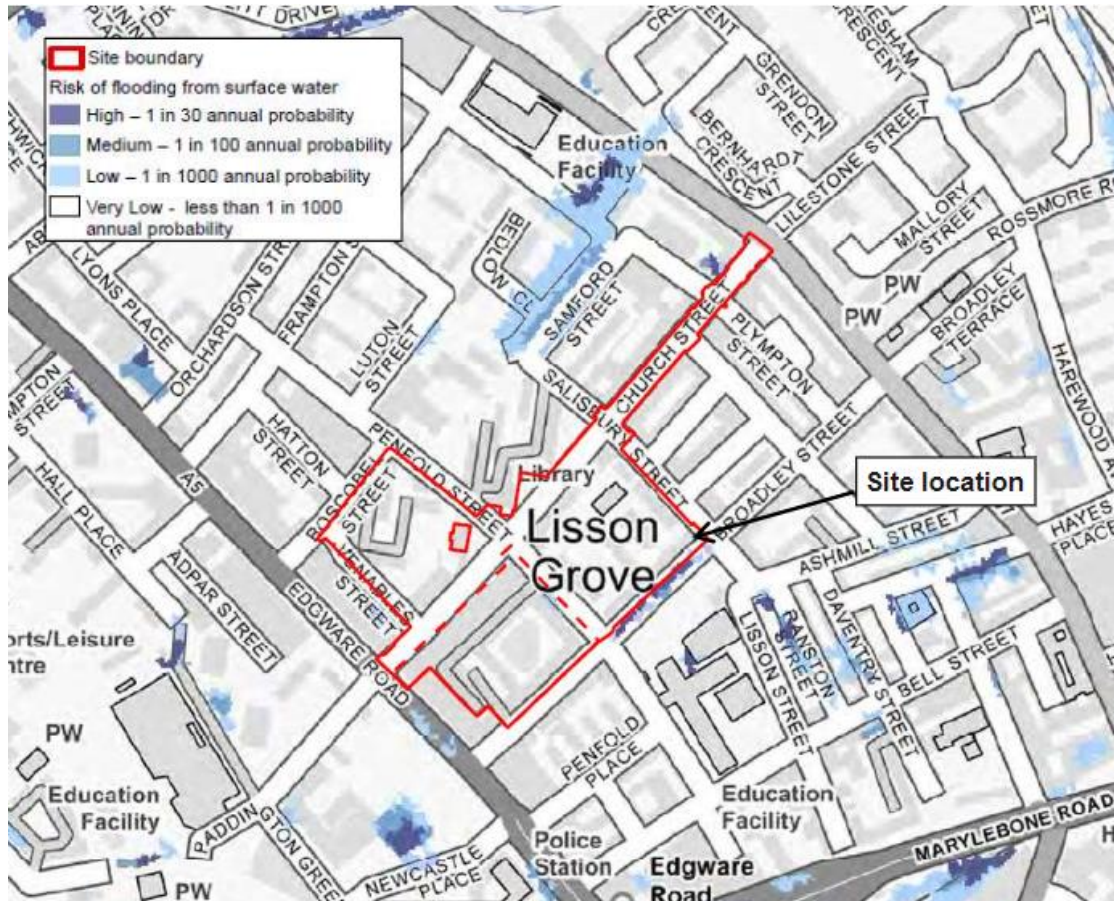


Figure 6: Environmental Agency Risk of Flooding from Surface Water

- 9.291 Online Surface Water Flood Maps indicate that there is a very small local area on the northern part of Church Street (near Lisson Grove), which is at 'High' risk of surface water flooding. The online maps indicate that the flood depths at this location is unlikely to exceed 300mm for 1 in 30 year AP rainfall event, 600mm for 1 in 100 year AP rainfall event and 1200mm for 1 in 1000 year AP rainfall event. The velocity is identified to be less than 0.25m/s.
- 9.292 With respect to the Proposed Development and mitigation, a large-scale rainwater recycling system for the irrigation of trees and planting areas at podiums of Block A1 and A2 was considered at an early stage of the scheme. This study concluded that (i) additional plantrooms for the irrigation tanks and pumps would be required, (ii) the irrigation system would use approximately 5% rainwater and 95% mains water. Due to spatial constraints, it was established that it has not been possible to fit in plantrooms to serve the large-scale irrigation system. Biodiverse green roofs are proposed at high level roof, and the reservoir/drainage layer, which is part of the green roof build up will store rainwater for irrigation of the plants (green roofs) via capillary action, in accordance with London Plan Policy S113.
- 9.293 For the Outline element, principles for mitigation are set out and have been agreed with the design team and are also included in the DAS to ensure that the Proposed Development is protected from future wetter

winters and seasonal extreme flood events. Specifically, a high proportion of soft landscape will ensure greater natural rainwater attenuation and ground infiltration to water table and river systems and planted swales and rain gardens with water logged tolerant species to assist with attenuation and evapotranspiration of excess water in accordance with London Plan Policies SI12 and SI13.

- 9.294 The surface water drainage strategy has been developed using best practice and utilising a combination of SuDS, including biodiverse green roofs, blue roofs, permeable/porous pavement and geo-cellular storage tanks. Surface water discharge rates will be restricted to 1.5-2.0l/s per connection. This represents a practical discharge rate and is almost the same as the greenfield runoff rate of mean annual flood. Thames Water Utilities Limited ('TWUL') confirms that proposed surface water discharge rates are acceptable subject to compliance with London Plan Policy SI13.
- 9.295 Furthermore, the FRA notes that as the Proposed Development for mixed use development fall within the 'More Vulnerable' uses, these are considered appropriate for Flood Zone 1 without the need to apply the NPPF Sequential or Exceptions Test. Therefore, the Proposed Development in terms of residential is appropriate at this location.
- 9.296 The foul water drainage strategy for the site is to connect/discharge into the existing TWUL combined sewers in the immediate vicinity of the site.
- 9.297 TWUL confirms that the existing combined sewers in the vicinity of the site have adequate capacity to drain the foul water drainage from the proposed development.
- 9.298 Regarding the residual risk of flooding, in the case of rainfall events in excess of the design standard of the proposed surface water management system, site levels have been designed to direct flows away from the building entrances where possible, and towards areas such as open external areas or formal landscaping (i.e., courtyard) where temporarily shallow flooding can occur, or into adjacent highways where the impacts of such flooding would be low. This is designed in accordance with London Plan Policy SI12, and the FRA concludes that the residual risk is considered to be acceptable for the lifetime of the Proposed Development. Therefore, the requirements of London Plan Policy SI 12 are met in this respect.
- 9.299 In order to safeguard against the risk of flooding of basement in Block A1, it is proposed that a drainage network equipped with a sump pump is provided in this basement. The sump pump will drain into the proposed foul water drainage network at ground level and outfall into the existing public combined sewers, in accordance with WCC City Plan Policy 35. Therefore, it is concluded that the Proposed Development meets the requirements of WCC City Plan Policy 35 in terms of providing measures to protect the Site against the risk of flooding in the basement of Block A1.

Fire Safety

- 9.300 National Planning Policy Guidance (2021) requires a Gateway One (the planning gateway) when submitting a Fire Statement, which came into effect on 1 August via an amendment to existing planning legislation due to the Building Safety Bill not yet being passed as law.

- 9.301 London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage: “*In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety...*” Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users.
- 9.302 The GLA published draft guidance in March 2021 on Fire Safety to ensure proposed developments have achieved the highest standards of fire safety.
- 9.303 Accompanying this application, is a Fire Statement prepared by Arcadis Fire Specialist, which sets out the fire safety strategy and concludes that all residential developments within the Proposed Development for Site A should operate a “defend in place” evacuation regime, meaning occupants will not be expected to evacuate their respective flats in the event of a fire in the building in accordance with London Plan Policy D12.
- 9.304 With regard to non-residential uses, basement car park, ground floor commercial units and library will adopt a simultaneous evacuation regime. Further to this, the Statement confirms that the management of the proposed building within Site A and the maintenance of the fire safety systems will fall under the control of Fire Safety Act 2021 as well as additional management requirements specific to this building relating to the evacuation of people with disabilities. Moreover, the Statement sets out the approach for an automatic fire sprinkler system, emergency lighting, means of escape, a fire alarm with a detection system in place, firefighting shafts, external walls, and external fire spread between buildings. On this basis, the Proposed Development complies with London Plan Policy D12 in terms of achieving high standards of fire safety and ensuring the safety of all building users and for a Fire Statement to be submitted for major development proposals and Policy D5 with regard to ensuring safe and dignified emergency evacuation for all building users.

Archaeology

- 9.305 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 189 states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.
- 9.306 London Plan Policy HC1 seeks to ensure that proposals identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 9.307 In accordance with relevant policy requirements and guidance, a desk-based assessment has been undertaken to clarify the archaeological significance of the Site. The assessment concludes that in terms of relevant nationally significant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Battlefield, or Historic Wreck sites have been identified within the vicinity of the Site.
- 9.308 In terms of relevant local designations, study Sites A and C, and the western extent of Church Street, is located within a Tier II Archaeological Priority Area as defined by the City of Westminster and their archaeological planning advisors at Greater London Archaeology Advisory Service (‘GLAAS’).

9.309 Past-post depositional impacts within the Site are considered likely to have had a negative archaeological impact, as a result of several phases of development, together with World War Two Bomb Damage. In view of these findings, further archaeological mitigation measures associated with the Estate Regeneration may be considered, subject to further discussions between the Applicant and relevant Stakeholders. The Proposed Development will minimise the risk of causing harm to archaeological assets through high-quality design that respects these assets, in accordance with London Plan Policy HC1.

Equality

9.310 London Plan GG1 seeks to “build on the city’s tradition of openness, diversity and equality, and help deliver strong and inclusive communities” and those involved in planning and development must:

- *“Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city”;*
- *“Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation”;*
- *“Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish”;*
- *“Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time”;*
- *“Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements”;* and
- *“Support the creation of a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation”.*

9.311 More generally, the Equality Act 2010 places a duty to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

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9.312 The proposed development has been designed to have due regard to the above planning policies and an Equalities Impact Assessment has been submitted as part of this Application.

10. Planning Obligations & CIL

Planning Obligations

- 10.1 In accordance with Section 106 of the Town and Country Planning Act 1990 (as amended), planning obligations can be used as part of the planning application process to address specific planning issues arising from development proposals.
- 10.2 In respect of the negotiation of planning obligations associated with development, Paragraph 57 of the NPPF repeats the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, which provide that planning obligations must only be sought where they meet all of the following tests:
- a) *“Necessary to make the development acceptable in planning terms*
 - b) *Directly related to the development; and*
 - c) *Fairly and reasonably related in scale and kind to the development”*
- 10.3 It is anticipated that an appropriate package of Section 106 Contributions will continue to be discussed with Officers following submission of this planning application.
- 10.4 As the current Planning Obligations SPG is adopted in January 2008, the draft Planning Obligations SPD is anticipated. According to WCC’s Local Development Scheme, the indicative scheme for this draft document sets out that the scoping has already begun.
- 10.5 The Applicant will hold discussions with the WCC regarding the heads of terms that might be required should the Council be minded to grant planning permission for the Proposed Development. Discussions with the Council will be centred around the specific details and nature of the proposals together with guidance given in WCC’s Planning Obligations SPG (2008). In order to secure the scheme’s benefits, the heads of terms below may be considered appropriate; the exact amounts payable for financial contributions toward these heads:
- Public Transport Infrastructure;
 - Affordable Housing;
 - Public Realm;
 - Social, Cultural and Community;
 - Education Training and Employment;
 - City Management; and

- Area Transport & Environmental Management Studies and Works.

Community Infrastructure Levy

10.6 The Mayor of London adopted his second charging schedule MCIL2 on the 1 April 2019. CIL is chargeable on the uplift in floorspace measured in terms of Gross Internal Area ('GIA'), in order to help meet the cost of delivering Crossrail. The development is located in Zone 1 and Central London and will therefore be liable to Mayoral CIL in the form of MCIL2 at the following rates:

- Offices - £185 per sqm;
- Retail - £165 per sqm;
- Residential - £80 per sqm;
- Education - £0 per sqm; and
- All other uses - £80 per sqm.

10.7 In accordance with WCC's CIL Charging Schedule (2016), the Proposed Development is located in the 'Fringe' part of the WCC CIL Charging Zones and will therefore be liable for CIL at the following rates:

- Residential - £200 per sqm; and
- Commercial (offices; hotels, nightclubs and casinos; retail) - £50 per sqm.

11. Conclusion

- 11.1 This Hybrid Planning Application will provide the framework for the redevelopment of the Church Street Estate in accordance with Westminster City Council ambition for a City for All.
- 11.2 This Application has been developed following an extensive pre-application consultation process with WCC, GLA, TFL and other key stakeholders. Consultation with existing residents, local community groups and resident associations has been far-reaching and widespread, and will continue throughout this process. This level of engagement has generated a wealth of information which was subsequently embedded into the design development of the scheme.
- 11.3 This Application presents an exciting and significant opportunity to make better use of a well-connected, previously developed site, which could make a significant contribution to meeting WCC targets for growth. The Application seeks to sustain a diverse neighbourhood rooted in a cultured place, that would be recognised within the City for high quality living and community.
- 11.4 The NPPF establishes a presumption in favour of sustainable development and, in the light of the need to promote growth and London's housing crisis, the NPPF indicates that applications for sustainable development should be allowed without delay.
- 11.5 The Site is identified at all levels of planning policy as suitable for significant redevelopment. Notably, the Church Street Estate was first identified in 2010 as one of the five priority housing estates for housing renewal and is now supported by a Site Allocation within the City Plan.
- 11.6 The Proposed Development will deliver a number of significant benefits including:
- Provide a high-quality residential neighbourhood for the community of Church Street existing and new;
 - Delivery of up to 1,121 high quality new homes, of which at least 50% will be affordable;
 - Re-provision of existing affordable homes with uplift, allowing existing residents the right to return;
 - Beautifully designed new homes with 100% dual aspect for Site A and commitment to achieve dual aspect where possible in the outline phases;
 - Tenure blind approach to facilitate a mixed and balanced community;
 - Adhering to WCC's net zero carbon approach through highly efficient new homes;
 - New public realm, which incorporates play space to meet all ages of play and high-quality landscaped open space and private/communal amenity space.

- Comprehensive tree planting strategy and enhanced green space, such as green roofs to achieve an Urban Greening Factor above 0.4;
- Incorporation of a sustainable urban drainage system;
- Enhanced market infrastructure, such as storage and van parking for market traders to help those businesses flourish and promote opportunities for increased vibrancy and footfall;
- A brand new library which is designed flexibly to incorporate different uses;
- Providing active frontages along Church Street and Edgware Road with a flexible solution to Class E space to adapt to the changing market.

11.7 The Application is supported by a suite of technical and environmental reports that assess the scheme's impact on infrastructure and the environment. Whilst the conclusions of these reports are not reported here, the overall performance of the Proposed Development in these tests is beneficial and where there are localised areas where guideline targets are not met, the results achieved are consistent with the level of compliance that might be expected in a tight high density urban location.

11.8 The Proposed Development will be accompanied by appropriate Section 106 and CIL contributions to support wider infrastructure delivery around the scheme.

11.9 Overall, the redevelopment of the Church Street Estate will bring forward an exemplary and high-quality development that will deliver very significant benefits for residents and businesses of the City. It is our conclusion that the proposals are in accordance with the policies of the development plan when read as a whole and WCC vision for a City for All, and that any harm that might be identified is more than outweighed by the substantial and significant benefits of the scheme.

12. Appendix 1: Planning History

Address	Reference	Description	Outcome
382 - 386 Edgware Road London W2 1EB	95/05284/FULL	CHANGE OF USE FROM CLASS A1 RETAIL TO CLASS A2 BETTING OFFICE (NO. 382) AT GROUND FLOOR LEVEL.	26 th October 1995: approved
382 - 386 Edgware Road London W2 1EB	95/07580/FULL	CHANGE OF USE FROM CLASS A1 RETAIL TO CLASS A2 (BETTING OFFICE)	7 th November 1995: approved
382 - 386 Edgware Road London W2 1EB	96/00212/FULL	INSTALLATION OF 1.3m DIAMETER SATELLITE ANTENNA TO FIRST FLOOR FLAT ROOF WITH USE AS LICENSED BETTING OFFICE	15 th April 1996: approved
Ingrebourne House 102 Broadley Street London NW8 8DL	08/07203/FULL	New windows and doors to each flat.	3 rd November 2008: approved
Cray House 47 Penfold Street London NW8 8DR	08/07168/FULL	Replacement windows and doors.	3 rd November 2008: approved
Pool House 45 Penfold Street London NW8 8DP	08/07209/FULL	New windows to all flats and internal front doors.	3 rd November 2008: approved
Lambourn House 100 Broadley Street London NW8 8DN	08/07206/FULL	New windows and doors.	3 rd November 2008: approved
Blackwater House 107 Church Street London NW8 8HL	08/07166/COFUL	Replacement of windows and doors to all flats.(Council's Own Development).	15 th December 2008: approved

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Lambourn House 100 Broadley Street London NW8 8DN	08/09553/COFUL	Installation of new railings and security gate.	13 th January 2009: approved
Cherwell House Church Street Estate London NW8 8PT	09/00253/COFUL	Alterations to boundary walls and gates to Penfold Street and Salisbury Street and associated hard and soft landscaping (site comprising Cherwell House, Loddon House, Wey house and Wytham House).	4 th March 2009: approved
Church Street Library Church Street London NW8 8EU	08/08050/COGADF	Details of green roof and cycle racks pursuant to Conditions 3 and 4 of planning permission dated 17 July 2008 (RN: 08/04336).	11 th May 2009: approved
384 Edgware Road London W2 1DR	09/02282/ADV	Display of non-illuminated fascia sign.	15 th June 2009: approved
384 Edgware Road London W2 1DR	09/02281/FULL	Installation of retractable projecting canopy to ground floor shopfront (facing Church Street).	15 th June 2009: approved
94 Church Street London NW8 8EX	09/01394/FULL	Installation of an automatic teller machine (ATM) in shopfront.	27 th August 2009: approved
Church Street London NW8	09/05609/FULL	Installation on footway of cycle hire docking station for the Transport for London Cycle Hire Scheme containing a maximum of 18 docking points for scheme bicycles plus a terminal to secure and release bicycles and to provide registration and payment facilities and wayfinding mapping at 74-88 Church Street.	18 th August 2009: approved

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Church Street Library Church Street London NW8 8EU	09/03768/COFUL	Replace aluminium windows with white powder coated aluminium double glazed windows.	3 rd August 2009: approved
384 Edgware Road London W2 1DR	09/07228/ADFULL	Details of technical specification of the canopy, including sample, of materials and colour of material pursuant to Condition 3 of planning permission dated 15 June 2009 (RN: 09/02281)	6 th October 2009: approved
67 Church Street London NW8 8EU	09/08272/COFUL	Use of ground floor as library entrance and associated external alterations including new shopfronts, rear disabled access ramp, fencing, gates and hard and soft landscaping to the existing library courtyard. (Council's Own Development).	10 th December 2009: approved
Penfold Street London NW8	09/10211/FULL	Installation on land adjacent Kennet House of cycle hire docking station for the Transport for London Cycle Hire Scheme containing a maximum of 16 docking points for scheme bicycles plus a terminal to secure and release bicycles and to provide registration and payment facilities and wayfinding mapping.	11 th February 2010: approved
Penfold Street London NW8	10/02039/ADFULL	Details of the docking point lock and release mechanism and detailed drawings at a scale of 1:10 of the docking point design pursuant to Condition 1 of planning permission dated 11 February 2010 (RN: 09/10211).	15 th April 2010: approved

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Church Street London NW8	10/01846/ADFULL	Details of the docking point lock and release mechanism and detailed drawings at a scale of 1:10 of the docking point design pursuant to Condition 1 of planning permission dated 18 August 2009 (RN: 09/05609)	15 th April 2010: approved
Church Street London NW8	10/02166/NMA	Amendments to planning permission dated 18 August 2009 (RN: 09/05609) for installation on footway/carriageway of cycle hire docking station for the Transport for London Cycle Hire Scheme containing docking points for scheme bicycles plus a terminal to secure and release bicycles and to provide registration and payment facilities and wayfinding mapping. Namely, minor amendments to terminal design, foundation design and materials.	23 rd April 2010: approved
Church Street Library Church Street London NW8 8EU	10/02325/ADV	Display of one non-internally illuminated entrance fascia sign and one non-illuminated sign written directly to building cladding.	1 st April 2010: approved
67 Church Street London NW8 8EU	10/04092/COFUL	Replacement of shopfront (forming part of a project to convert a shop unit into public entrance to Church Street library).	23 rd June 2010: approved
56 Ravensbourne House Broadley Street London NW8 8BE	10/07760/FULL	Installation of satellite dish	10 th November 2010: approved

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109 Church Street London NW8 8HA	11/03711/FULL	Installation of new shopfront and external lattice 'brick bond' roller shutter.	4 th July 2011: approved
109 Church Street London NW8 8HA	11/03712/ADV	Display of internally illuminated fascia sign. and externally illuminated projecting sign.	4 th July 2011: approved
384 Edgware Road London W2 1DR	11/05737/TCH	Use of the public highway for the placing of four tables and eight chairs on pavement along the Church Street frontage in an area measuring 6.5m x 1m in connection with Coffee Connoisseur.	1 st September 2011: refused
Ingrebourne House 102 Broadley Street London NW8 8DL	11/08465/COFUL	Replacement of windows to front, rear and side elevations and installation of new gates and railings.	20 th December 2011: approved
Cray House 47 Penfold Street London NW8 8DR	11/08375/COFUL	Replacement of windows and doors	20 th December 2011: approved
Pool House 45 Penfold Street London NW8 8DP	11/08413/COFUL	Installation of replacement windows and doors and erection of new entrance gate and railings.	20 th December 2011: approved
Lambourn House 100 Broadley Street London NW8 8DN	11/08415/COFUL	Installation of replacement windows and doors, erection of new railings and gates and formation of new entrance lobby.	20 th December 2011: approved
91 Church Street London NW8 8EU	12/12019/ADV	Display of non-illuminated fascia signage and window vinyl adverts to Church and Penfold Street elevations.	13 th December 2012: approved

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Church Street London	12/08614/COADV	Display of two internally illuminated free-standing signs displaying the words 'CHURCH STREET MARKET', one at either end of Church Street (one fronting Edgware Road and the other fronting Lisson Grove). (Council;s Pwm Development)	12 th March 2013: approved
94 Church Street London NW8 8EX	13/05393/FULL	Alterations to shopfront including timber cladding.	21 st August 2013: approved
94 Church Street London NW8 8EX	13/05392/ADV	Installation of advertising vinyls films to windows on Church street elevation (split decision).	21 st August 2013: refused
382-386 Edgware Road London W2 1EB	12/00938/FULL	Erection of two storey roof extension in connection with continued use of ground floor for retail (Class A1) use and nine residential units on upper floors (Class C3) (4 x 1-bed, 2 x 2-bed, 3 x 3-bed) with roof terraces. Installation of plant within screening and alterations to shopfronts on Church Street and Edgware Road elevations.	20 th August 2013: approved
59 Church Street London NW8 8EU	15/03323/CLEUD	Retention of the existing mechanical system extraction ductwork discharging from ground floor flat roof by external ductwork.	3 rd July 2015: refused
Venables Street London NW8	15/07114/COFUL	Demolition of existing garages adjacent to Darent House and Windrush House in connection with the temporary use of the land as market storage for the Church Street market traders,	29 th September 2015: approved

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		the erection of storage containers and new gates, fencing and security lighting.(Council's Own Development)	
382-386 Edgware Road London W2 1EB	15/11772/FULL	Erection of two storey roof extension in connection with continued use of ground floor for retail (Class A1) use and nine residential units on upper floors (Class C3) (4 x 1-bed, 2 x 2-bed, 3 x 3-bed) with roof terraces. Installation of plant within screening and alterations to shopfronts on Church Street and Edgware Road elevations.	19 th February 2016: application withdrawn
16/00622/FULL	16/00622/FULL	Use of ground floor as community centre with new windows and security grilles to rear elevation	30 th March 2016: approved
99 Church Street London NW8 8EY	16/04707/COADV	Display of one non-illuminated fascia sign measuring 3.00m x 5.50m.	27 th May 2016: approved
99 Church Street London NW8 8EY	16/04054/NMA	Amendments to planning permission dated 30 March 2016 (RN: 16/00622) for use of ground floor as community centre with new windows and security grilles to rear elevation namely, omission of the windows and security screens to the rear elevation.	17 th May 2016: approved
Venables Street London NW8	16/05669/NMA	Amendments to planning permission dated 29 September 2015 (RN: 15/07114/COFUL) for	21 st July 2016: approved

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		demolition of existing garages adjacent to Darent House and Windrush House in connection with the temporary use of the land as market storage for the Church Street market traders, the erection of storage containers and new gates, fencing and security lighting. Namely to allow the movement of Unit B containers 1m away from Unit A containers, paint all container roofs white, addition of 2 chilled units, movement of 4 chillers and increase in size of the meter cupboard.	
59 Church Street London NW8 8EU	16/00167/CLEUD	Retention of the existing mechanical extraction system ductwork between ground floor level and main roof level.	18 th August 2016: refused
382-386 Edgware Road London W2 1EB	16/03119/ADFULL	Details of Code for Sustainable Homes, Breeam Assessment and Passive Design and associated measures, pursuant to Conditions 14, 15 and 21 of planning permission dated 20 August 2013 (RN : 12/00938/FULL).	7 th November 2016: no further action
Blackwater House 107 Church Street London NW8 8HL	15/08260/COFUL	Replacement and vertical extension of an existing garage behind Blackwater House to house waste compactor unit to serve the Church Street Market traders.(Council's Own Development)	18 th November 2016: approved

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382-386 Edgware Road London W2 1EB	17/04311/FULL	Construction of a part two, part three storey extension to the existing building incorporating green roofs and a terrace; basement excavation and external facade alterations in association with the provision of four retail units at ground floor level, 7 residential units and additional office (Class B1) floorspace.	26 th September 2017: approved
Church Street London	17/08569/COADV	Display of Christmas lights on 13 columns and 5 street trees along Church Street from 20 November to 7 January each year until 7 January 2022	27 th October 2017: approved
Salisbury Street, Church Street, Broadley Gardens, Lisson Gardens And Lisson Street London	17/06139/COFUL	Public Realm works to Salisbury Street, Church Street, Broadley Street Gardens, Lisson Gardens and Lisson Street (Phase 1 of the Green Spine Project)	15 th May 2018: approved
5 Lambourn House 100 Broadley Street London NW8 8DN	18/06597/FULL	Installation of timber and metal fencing fixed to original 1.2m high brick boundary wall next to a highway in respect of Flat 5.	4 th October 2018: approved
Lambourn House 100 Broadley Street London NW8 8DN	18/06030/COCLE	Installation of timber and metal fencing fixed to original 1.2m high brick boundary wall next to a highway in respect of Flats 1, 2, 3, 4, 6 and 7.	19 th November 2018: approved
Church Street Library Church Street London NW8 8EU	19/06536/COFUL	Installation of two air conditioning units within undercroft carpark	23 rd September 2019: approved

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59 Church Street London NW8 8EU	20/01254/CLEUD	Use of ground, mezzanine and basement as mixed (Class A1 and A3) use bakery/cafe (sui-generis)	8 th June 2020: approved
64 Church Street London NW8 8ET	20/06782/COADV	Display of a 24ft Christmas tree and associated lighting on the Church Street Triangle from 16 November 2020 to 11 January 2021, and display of tree and lighting for the same festive period over following four years.	6 th November 2020: approved
94 Church Street London NW8 8EX	21/00269/ADV	Display of three internally illuminated fascia signs measuring 0.6m x 5m, 0.6m x 4.2m, 0.35m x 2.46m and four non-illuminated fascia signs measuring 0.6m x 16.1m, 0.6m x 16.2m, 0.6m x 2.1m, 0.6m x 1.55m, two non-illuminated panels measuring 1.1m x 1.4m and 0.7m x 1.45m, and fourteen window vinyls measuring 2.33m x 2.42m, 1.7m x 2.42m, 1.4m x 1.1m, 1.45m x 0.7m.	25 January 2021: refused
94 Church Street London NW8 8EX	21/00892/ADV	Display of four non-illuminated fascia signs measuring 0.6m x 16.1m, 0.6m x 16.2m, 0.6m x 2.1m, 0.6m x 1.55m and three internally illuminated sign measuring 0.6m x 0.5m, 0.6m x 4.2m, 0.35m x 2.46m.	30 th March 2021: approved

