
Written representation to the Westminster City Plan 2019-2040 Main Modifications consultation

On behalf of Imperial College Healthcare Trust

January 2021

BDP.

1 Introduction

- 1.1 These representations are submitted by BDP on behalf of Imperial College Healthcare NHS Trust ('the Trust'). They have been prepared further to previous written representations made during earlier consultations on the Plan by DP9 on behalf of the Trust and its development partner GWD (ID 26 / Ref. EX012), and those made by BDP during the Examination hearings held in September and October 2020.
- 1.2 The Trust is a long-term stakeholder in the Paddington Opportunity Area and is looking to deliver a major redevelopment scheme, referred to as the St Mary's Quarter (SMQ), on the site of the existing St Mary's Hospital. SMQ is an important strategic site in Westminster with the ability to deliver world class healthcare facilities, jobs, major public realm, and transport connections. This includes the provision of commercial laboratory space as part of a life sciences/biomedical hub, which will play a key role in the success of the Government's Life Science Industrial Strategy.
- 1.3 The representations submitted concern the following Main Modifications to the City Plan:
- Main Modification 06 (Policy 3, Paddington Opportunity Area)
 - Main Modification 12 (Policy 10, Affordable Contributions in the CAZ)
 - Main Modification 41 (Policy 42, Building Height)
 - Main Modification 49 (Appendix 1, Housing Trajectory)

2 Main Modification 06 (Policy 3, Paddington Opportunity Area)

- 2.1 St Mary's Hospital lies at the heart of the Paddington Opportunity Area. The delivery of a replacement hospital will meet a strategic need for healthcare in north west London, along with wider economic benefits of new commercial development, public realm and transport upgrades. The regeneration potential of the SMQ site is therefore significant for the whole of the Opportunity Area.
- 2.2 We therefore support the addition to Policy 3, under MM06, of development priority *F. Upgraded Healthcare Facilities*, which recognises the strategic importance of improved healthcare provision at St Mary's Hospital. We also welcome the amendments made to supporting text, which previously referred to the ability of the SMQ site to provide "*significant residential and commercial uses, strengthen sense of place and encourage dwelling through an enhanced public realm, and improve links and permeability to the south of the Opportunity Area*", but now refers to the site "*meeting the other priorities in the Paddington Opportunity Area and wider City Plan objectives*" along with improved healthcare facilities. This offers an appropriate amount of flexibility over the final form of the Masterplan during the early stages of its development.

3 Main Modification 12 (Policy 10, Affordable Contributions in the CAZ)

- 3.1 We previously expressed major concerns over the principle of Policy 10, which we believed would compromise the viability of large and strategic schemes and in turn constrain the delivery of commercial growth in the borough, conflicting with the strategic growth objectives expressed under Policy 1 of the Plan. We therefore support MM12 which sees the removal of Policy 10 in its entirety.

4 Main Modification 41 (Policy 42, Building Height)

- 4.1 We expressed concerns at the Examination hearings that Policy 42, as then drafted, did not recognise the full potential for taller buildings in the Paddington Opportunity Area. At present, a tall hospital building on the SMQ site is considered to be the most effective way to deliver a new hospital in terms of responding to the constraints of the site, to accommodate anticipated changes in the nature of healthcare provision, and the need to maintain an operational hospital during construction with the complexity of phasing this presents. Policy 42 would therefore need to be able to accommodate a tall building proposal in order to meet the development priorities of Policy 3, and the strategic healthcare needs of north west London.
- 4.2 We support the removal by MM41 of wording that Westminster is not generally suitable for tall buildings, and the retention of the approach that proposals for tall buildings will be judged in accordance with the general principles in Clause B (Clause D as submitted). We consider this part of the policy entirely appropriate and that it will permit the council control over inappropriate development, as tall buildings will only be acceptable in a suitable context and supported with a robust urban design justification.
- 4.3 We raised concern at the hearings over the locational principles for the Paddington Opportunity Area in Clause C (Clause E as submitted) and the identification of One Merchant Square as a central location/high point within Paddington. The London Plan town centre hierarchy identifies Paddington and Praed Street as a District Centre, within which the Urban Initiatives evidence base underpinning Policy 42 suggests it would be appropriate for a landmark building to mark a place or function of district-wide importance, such as a strategic infrastructure node or major public institution, such as a hospital. These characteristics are far more clearly displayed by a hospital building in proximity to Paddington Station than a residential tower, indicating that a hospital building should be the tallest, landmark building in the cluster. As such, we welcome the removal under MM41 of text referring to One Merchant Square being the highest point of the cluster, as this enables the potential for a tall hospital building of district landmark status to be brought forward as the highest point.
- 4.4 We do however remain concerned that this aim is precluded by the remainder of MM41 and the approach to the context factor ratio. While it is stated that there may be potential for further tall buildings that complement and help to frame the setting of the *Paddington Basin* (within which there are existing and emerging buildings ranging from 60 to 150 metres in height), this appears to conflict with identification of the prevailing context height for the *wider Paddington area* as 6 residential storeys (20m) and the statement that tall buildings of 2-3 times this context height may be appropriate. We note that the same prevailing context height and ratio of 2-3 times 6 residential storeys (20 metres) is also identified for the Victoria Opportunity Area and Marylebone Flyover/Edgware Road junction, which appears odd given that these are clearly quite different areas with different development contexts. Indeed, the locational principles for the Marylebone Flyover/Edgware Road Junction explicitly state that any tall building in this area must step down significantly from, and be subordinate to, those in the Paddington Basin cluster, so it is difficult to see how attributing the same 40-60 metre height limit in both areas can be justified.
- 4.5 At the Examination hearings we presented the findings of our own analysis of context height, which identifies an average building height of 46.6 metres within the Paddington Opportunity Area, and of 39.2 metres when using a radius of 200 metres from the hospital tall building site. For ease of reference, these baseline studies are illustrated in two diagrams contained in Appendix 1. These figures are both significantly higher than the Council's context figure of 20 metres, suggesting that the WCP's analysis of the wider Paddington area is not representative of the true context height of the Opportunity Area. We also argued that the applied factor of 2-3 times the context height does not reflect Paddington's status as a District Centre given that the council's evidence base, the Urban Initiatives study, identifies the appropriate factor for a district landmark in a varied context to be a ratio of 3-5 times the context height (a factor of 2-3 instead being appropriate for landmarks of

local significance). Using our calculated context height and Urban Initiatives' factor suggests that the SMQ site could accommodate a landmark building of between 117 to 196 metres in height.

- 4.6 We therefore consider that MM41 should include a correction to the identified context height of 20m as this height is not accurate or representative, and consider our submissions in relation to an adjusted figure. Secondly we request a correction be made to the appropriate factor to be applied when considering building heights in the Paddington Opportunity Area (3-5 times the context height), in line with the council's evidence base.
- 4.7 At the Examination, it was suggested by WCC that the policy would not preclude buildings of more than 3 times the context height being considered. We would welcome this intention being stated explicitly in the policy, for instance that the factor is intended to act as a guide and not to set a firm limit on building height.
- 4.8 These proposed changes to the locational principles of Policy 42 are considered necessary to bring Clause C of the policy into line with evidence of the urban design context of the POA, whereupon Clause C may function effectively alongside the general principles of Clause B. Furthermore this will reduce any tension with Policy 3 in providing a basis for a development form that can meet the strategic growth objectives for the POA.
- 4.9 We also note that previous modifications PS/DH/12, which stated that tall buildings outside identified areas must deliver exceptional public benefits, and PS/DH/17, which stipulated that all tall buildings should bring exceptional benefits to local areas and communities in line with the aspirations set out in the Spatial Strategy, have not been included in the Main Modifications. We consider however that the delivery of public benefits could be usefully referenced in Clause B as a general principle that tall building proposals must meet.

5 Main Modification 49 (Appendix 1, Housing Trajectory)

- 5.1 We support the revised Housing Trajectory proposed under MM49, and its approach to grouping developable sites and locations for growth within years 6-10 and 11-15 of the Plan by area, with individual sites to be assigned capacities through the forthcoming Site Allocations DPD.
- 5.2 We consider this to be more consistent with NPPF policy that requires 'developable' sites or broad locations for growth for years 11-15 to be identified where possible. The revised approach suggested under MM49 creates opportunities for a number of potential site promoters in the area to bring housing sites forward and meet the area housing target, rather than SMQ alone. This will also enable the SMQ Masterplan to be driven by healthcare priorities rather than a housing target.

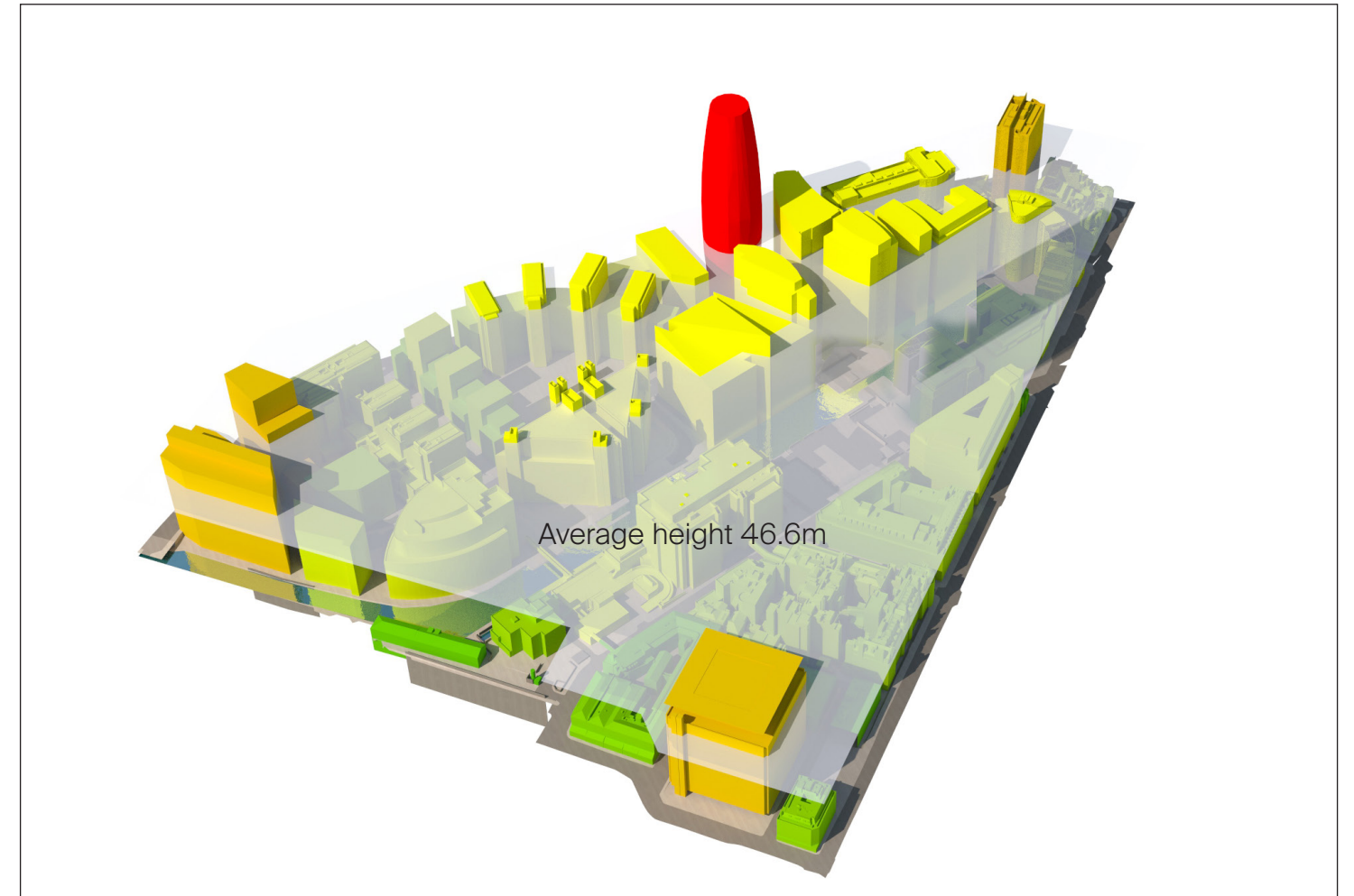
6 Conclusion

- 6.1 The Trust is supportive of the majority of main modifications to the plan, specifically MM06, MM12 and MM49 which address many of the concerns we have expressed at earlier consultation stages and at the Examination Hearings, and we are grateful that our comments have been responded to.
- 6.2 Our one continued concern is the approach to the context factor approach outlined in Policy 42 in relation to the POA, which we consider to be inaccurate. We would request WCC to consider our comments on this point, raised above and further to those comments raised at the Examination Hearings. While the removal of a reference to a step-down in height from One Merchant Square under MM41 is welcomed, we consider that further amendments are required to Policy 42 so as to more accurately reflect the urban design evidence, and not restrict the appropriate development of tall buildings within the Paddington Opportunity Area. In our view this is necessary for the soundness of the plan.

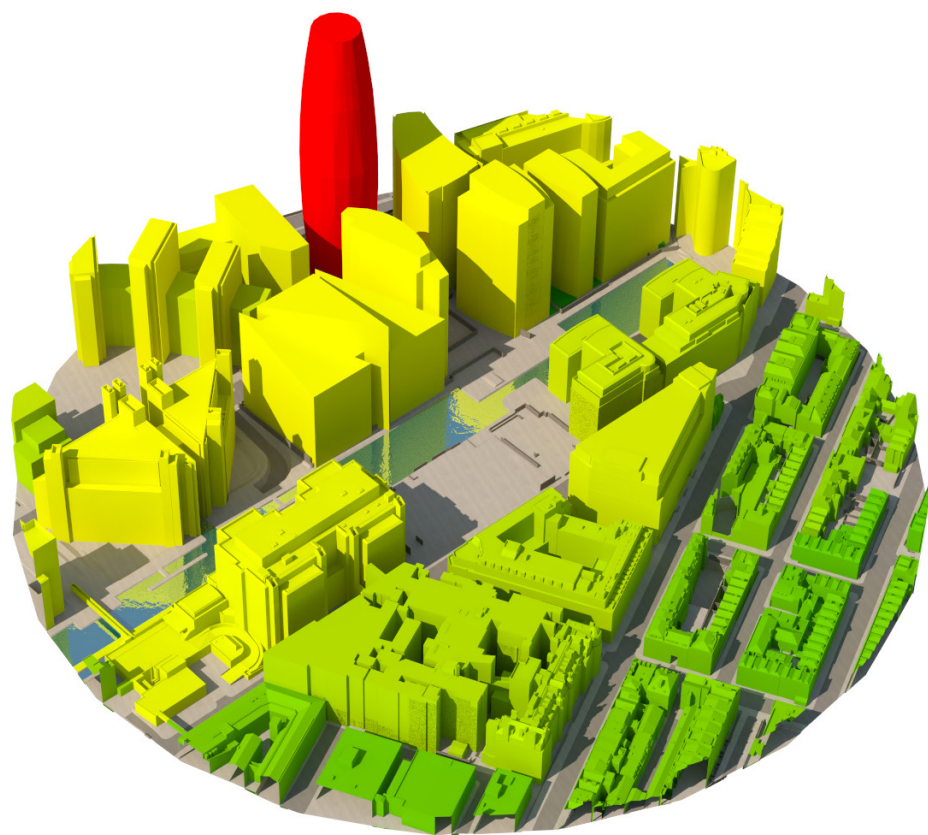
Appendix 1 – Paddington Opportunity Area Context Height Analysis



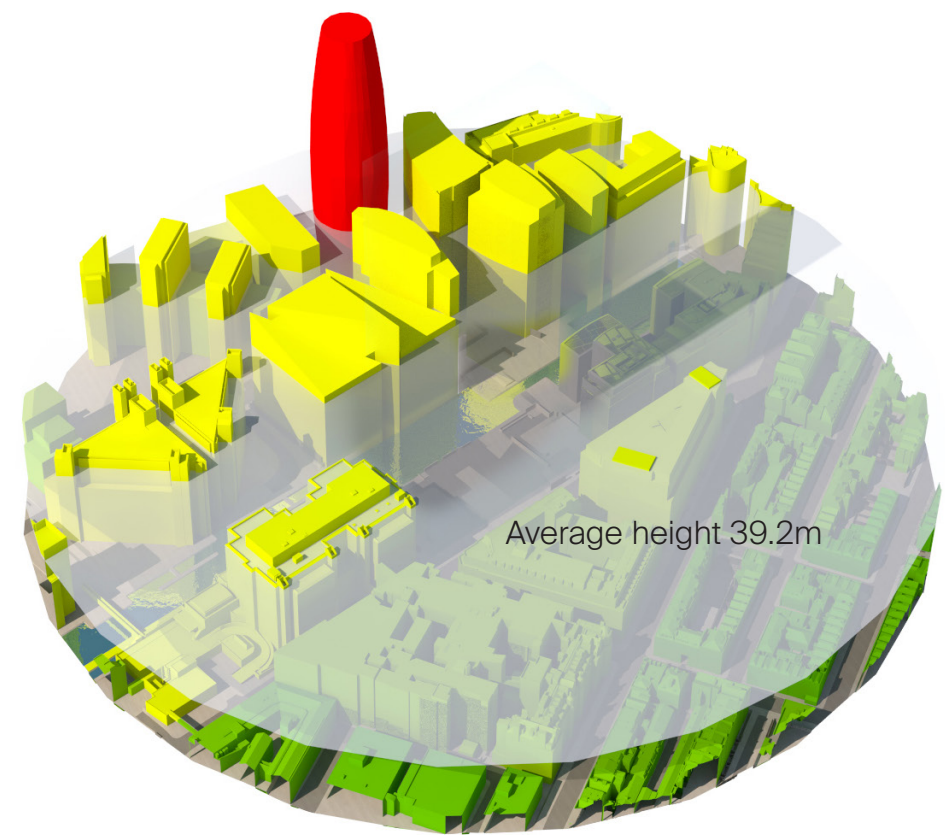
We applied two methodologies to establish the average building height within the varied context of the hospital site. The first used the boundary of the Paddington Opportunity area to calculate the average buildings heights.



Measuring each of the existing and consented buildings within the Paddington Opportunity Area, the average context height is 46.6m.



The second methodology used a boundary of a 200m radius circle from the centre of the Acrow site to define the varied context surrounding the site and and calculate the average buildings heights within this context.



Measuring each of the existing and consented buildings within the 200m radius context, the average context height is 39.2m.