

## **QUALIFIED OBJECTION**

### **HYDE PARK ESTATE ASSOCIATION**

**Paddington Sorting & Delivery 31 London Street London W2 1DJ**

**Ref. No: 15/11219/FULL**

In these comments referred to as ‘the Sellar application’.

The Hyde Park Estate Association (HPEA) is the residents’ association representing the views of people who live on the Hyde Park Estate and immediately areas. The area covers the residential and commercial area to the south of Praed Street, and between Lancaster Gate and Edgware Road.

The HPEA has also an integral part of the Hyde Park and Paddington Neighbourhood Area (HP&PNA) designated by the City Council and is, as a consequence, working alongside and closely with the Paddington Business Improvement District (BID).

31 London Street, although in the amenity area called the Paddington Waterways and Maida Vale Society (PWMVS), is on the boundary of the area covered by the HPEA, and within the area designated as the Hyde Park and Paddington Neighbourhood Area.

This application (the Sellar application) has been carefully considered, and consulted in the defined areas, and has been evaluated (by the HPEA’s Committee) against criteria set out in planning objectives adopted by the HPEA in its support for the HP&PNA.

We aim to balance the interests of long-established communities with those in the Paddington Opportunity Area and the Paddington Business Improvement District (BID). In particular we have looked at the impact on transport, the environment, cultural opportunities arising from the scheme, the promotion of Paddington, the importance of investment and the key need for partnerships between the statutory and non-statutory sectors.

**Based on these key criteria WE OBJECT to this application *in its current form* and have significant concerns, which would need to be fully addressed, before we could support any subsequent variation to the present proposal.**

1. Key background considerations
  - a. Paddington needs significant investment

To achieve the improvements necessary in Paddington, and to enable the fulfilment of the ambitions for the regeneration of Paddington, significant development investment will be needed. We accept that this will require the approval of high density and unique schemes capable of generating major private sector investment. This is particularly true of the complex sites where significant ground and infrastructure works are needed.

b. 31 London Street is a crucial site in Paddington

The Sellar site is central to the regeneration of Paddington. It will be a complex site to develop and will require extensive underground works to comply with the need to extend and improve the Bakerloo line station and entrance. We accept that this will mean the development is likely to be significant and able to generate the capital needed to undertake the essential engineering works.

c. Significant and iconic development of the site is necessary

We want to see a development that will bring significant benefits to Paddington. To do this, we believe that it will be necessary to encourage a comprehensive regeneration of this site and the adjoining NHS estate, through comprehensive masterplanning and careful and proper regard to the planning principles and guidelines set out by the HPEA and HP&PNA.

2. Key objections to the current application – The Sellar proposal does not meet the key criteria for approval.

a. A strategy and policy for TALL BUILDINGS

The Council already has a current policy for the consideration of applications for tall buildings (towers) in this UDP area of West London. The approved plan – which was widely consulted and accepted by local people - anticipates just one tower would be built on the Merchant Square site. Why is this application being entertained when it is clearly in contravention of the approved policy?

Many people consider that the Sellar application will have a very deleterious impact on the visual amenity of the area, and in particular damage the important heritage of the adjacent

conservation areas. **We reject the current proposal as far too tall and completely out of character for the area.**

We are not opposed, in principle, to the consideration of applications for tall buildings that – in the future - are set in the context of a properly and fully consulted policy relevant to the Paddington area. Indeed, we accept that higher density of construction is required to ensure the financial feasibility of complex schemes – especially where they are intended to contribute significantly to the costs of transport infrastructure improvements.

It would be completely unacceptable and unconstitutional for this application to be considered as an ‘exception’ to current policy. Such a provision should only ever be used in cases where applications are modestly outside the strict interpretation of planning policies, and not for a development like this, which stands out as extraordinary and shockingly unique.

b. Proper MASTERPLANNING of the site in context

31 London Street cannot be developed out of context with the neighbouring critical buildings, road networks and future possible area regeneration. This site is an integral part of the extensive NHS St Mary’s Hospital site. It is also directly alongside the intensively busy Praed and London Streets and the access to the hospital from Winsland Street. It is widely known that St Mary’s Hospital has been under consideration for redevelopment for many years. The site contains many buildings that are past their useful life. Access to the site for emergency vehicles is also compromised by the existing busy road networks around Paddington Station, and would be further impeded and inappropriate if the Sellar development is approved – in our view, even with the modified ‘bridge’ proposals for the movement of emergency vehicles across the ‘piazza’.

**We believe that comprehensive masterplanning of the 31 London Street site linked to the NHS estate, Praed Street, London Street and Paddington Station, is required before any proper consideration can be given the Sellar proposal.** Such a broad masterplan needs to be widely consulted with residents and the commercial and business interests in the area.

Applications for development can then be properly judged in context and the knowledge of what may be possible over time when the eventual and intended redevelopment of the NHS estate is implemented.

c. Local RETAIL IMPACT

The Sellar application has given no adequate thought and consideration to the impact on local retailing patterns arising from the commercial proposals. We are concerned to ensure the viability and long term success of the shopping parades in Praed Street, London Street and Spring Street. This is essential to protect and maintain the continuing development of the central Paddington area. **Retail studies are required to complement the Sellar application to enable analysis and understanding of the implications of proposal retail, restaurant and commercial outlets.**

d. TRANSPORT issues around development

The absence of comprehensive and adequate masterplanning of this site, and its proximity to the NHS estate, has given rise to a poorly planned and designed 'bridge entrance' over the plaza for the entrance of emergency vehicles. This would not be a satisfactory solution to the need for effective transport arrangements around the scheme, and will diminish and remove one of the key advantages argued for the scheme with the provision of the new plaza, including green spaces.

We are also very concerned by the lack of any consideration of the need for improvements to the infrastructure of Praed Street and London Street and and better and safer arrangements for pedestrian access across the road junction from the south of Praed Street to the 31 London Street site.

e. COMMUNITY GAIN

A vital part of the planning system is the availability of capital and revenue resources to mitigate the immediate impact of any development, and complement the local environment of the scheme. This is particularly the case in big developments that

have a major impact on the area. This is very much the case with the Sellar proposal.

The Sellar development will have a huge impact on the pedestrian access in Praed Street, London Street and Winsland Street, yet there are no concurrent proposals to enhance this critical and nearby infrastructure. In fact there are no proposals for expenditure under 's106' or the proposed 'CIL' that are intended to provide some community advantage for local people – **it seems that all the available planning gain is assumed to be used to implement improvements to the Underground Stations to be run and owned by Transport for London. This is not acceptable. We would like to see consideration to be given to:**

- **cultural opportunities**
- **capital investment in adjoining infrastructure**
- **community safety initiatives to reduce crime and anti-social behavior in the area**

#### f. AFFORDABLE HOUSING

The Council's strategy for the increase in affordable housing opportunities in the Borough is very much supported. It is essential that more homes are made available, especially for young working people on modest incomes who need to live in the centre of the city. We would like to see more provision in any development in Paddington for affordable 'less than market rent' housing, and also 'shared ownership' housing.

**The affordable housing proposal, associated with the Sellar development, is inadequate in our view and too limited to specialist almshouse type accommodation which, although no doubt making a contribution towards housing need, could not be considered to be a higher priority at this time.**

Nick Johnson OBE FRSA  
Chairman HPEA

On behalf of the Planning Committee of the Hyde Park Estate Association