

Site bounded by Shroton Street, Cosway Street,
Bell Street and Stalbridge Street
City of Westminster College, Cosway Street Centre;
29 Cosway Street (Westminster Youth Service)



draft planning brief

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Draft Planning Brief for

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(City of Westminster College, Cosway Street Centre; 29 Cosway Street
(Westminster Youth Service))

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1 Executive Summary

- 1.1 This brief outlines the Council's planning policies in relation to redevelopment and re use of the site bounded by **Shroton Street, Cosway Street, Bell Street and Stalbridge Street (City of Westminster College, Cosway Street Centre; 29 Cosway Street (Westminster Youth Service))**. There is an urgent need for a new primary school in this area and the use of this planning brief site for a primary school is seen as a priority. If other options arise for the new primary school, then a mix of community and residential uses would be desirable. 29 Cosway Street should be retained and incorporated in any redevelopment proposal, as it make a positive contribution to the character and appearance of the Lisson Grove Conservation Area within which this site is situated.

2 Introduction

- 2.1 This planning brief covers the **Site bounded by Shroton Street, Cosway Street, Bell Street and Stalbridge Street (City of Westminster College, Cosway Street Centre; 29 Cosway Street (Westminster Youth Service))**
- 2.2 The northern part of the site (1078m²) contains the City of Westminster College's Cosway Street Centre. The college building dates from the 1970s and provides the base for the Business and Science Schools and the administrative base for the Training and Community Partnerships Department.
- 2.3 The southern part of the site (1025m²) is occupied by 29 Cosway Street, a former London School Board Building, and the former school playground. It is currently in use as a centre for the Westminster Youth Service.

Purpose of the planning brief

- 2.4 The brief has been written to assist the City of Westminster College in formulating their plans for the future. They are currently undertaking a review of their property holdings. The College currently operates out of 5 centres in west and central London. A map showing the location of these centres, and a short history of the City of Westminster College is attached as Appendix 3.
- 2.5 The Paddington Green Centre is the main campus and administrative centre for the college. The existing building is not in good condition, and the college is considering a number of options, including:
- Relocating to another site in the vicinity and selling their existing site for redevelopment;
 - Redeveloping the existing site with new college buildings and other uses; or
 - Redeveloping the existing site for new college buildings
- 2.6 City of Westminster College is a well regarded and important local institution and the City Council as Local Planning Authority want to see the college stay in the area and be housed in suitable modern accommodation. A separate draft planning brief for the Paddington Centre has been prepared.
- 2.7 The City of Westminster College Cosway Street centre may become surplus to their requirements, depending on which option above is followed.
- 2.8 The City Council are considering whether the use of the rest of this site for the Youth Service makes best use of the Council's property resources, given that both parts of the site might be better suited for redevelopment as a new primary school, which population forecasts show is required in the north of the city.

- 2.9 This brief explains the framework of Unitary Development Policies that would apply to redevelopment of the Cosway Street site, and how this would affect the uses, type and form of development that may be permitted on the site.
- 2.10 The brief assumes that the main scenario is for the College to relocate from their Paddington Green site to another site in the vicinity and redevelop the Paddington Green site for alternative uses. As part of this relocation, their Cosway Street Centre would also be released.
- 2.11 The brief assumes that the whole of this planing brief site will be required for a new primary school and that change of use from D1 is unlikely to be acceptable. If the Cosway Street site either in whole or in part is not required for a primary school, the priority replacement use would be housing. The brief therefore also sets out the mix and car parking requirements that would be required from a housing development.

3 Policy Context

- 3.1 The relevant statutory planning framework for this site is set out in:
- 3.2 The Government's raft of Guidance documents;
- 3.3 The London Plan – Spatial Development Strategy for Greater London; There are no specific designations in the London Plan for this site.
- 3.4 The City of Westminster's UDP (informed by its Civic Renewal programme and City Plan – its community strategy), which is going through its final adoption processes at the time of writing, and may be the only relevant UDP version by the time this brief is read. Until formal adoption, the 1997 Plan remains the formal Development Plan and a material consideration is the pre inquiry version of the replacement UDP (August 2002) plus the modifications published in May 2004 and the further modifications published in September and December 2004.
- 3.5 The Council's draft replacement Unitary Development Plan (RUDP) has been the subject of a Direction under section 17(1) of the Town and Country Planning Act 1990, issued by the First Secretary of State on 9 December 2004. The Direction relates only to policies for affordable housing, but it prevents the adoption of the whole plan. The weight to be afforded to all parts of the draft plan other than affordable housing is unaffected by this Direction.
- 3.6 On 17 December 2004 the City Council's Director of Legal Services wrote to the Secretary of State advising of the City Council's intention to challenge the Direction in the Courts unless it has been withdrawn by 7th January 2005. The Direction is therefore now in dispute, and the City Council has been advised that the affordable housing policies in the draft RUDP should now continue to be afforded the same weight as they had prior to the Direction being issued, unless and until the Direction is confirmed by the Courts. The RUDP is a material consideration of significant weight, as it has reached the very final stage of preparation prior to its adoption.
- 3.7 This brief therefore uses the policies from the Revised UDP as proposed to be adopted.

4 The Site

- 4.1 The northern part of the site (1078m²) contains the City of Westminster College's Cosway Street Centre. The college building dates from the early 1960s and provides the base for the Business and Science Schools and the administrative base for the Training and Community Partnerships Department.

- 4.2 The southern part of the site (1025m²) is occupied by 29 Cosway Street, a former London School Board Building, and the former school playground. It is currently in use as a centre for the Westminster Youth Service.
- 4.3 Historic maps indicate that 29 Cosway Street formed part of St Stephen's School (later Cosway Primary School) and probably provided caretakers accommodation. The school occupied the north and west area of the planning brief site, with the school playground and caretaker's house to the south.
- 4.4 29 Cosway Street was completed in 1899 by the London School Board. It is a 3 storey building with a gabled roof, constructed of stock brick with red brick dressings. The building occupies a small corner of the site, the rest of the site is surrounded by a tall brick wall which would have been the wall to the playground. This playground currently has little amenity or recreational value. The playground is unused except for car parking and for the location of portacabins providing extra accommodation.
- 4.5 To the south of the site, on the other side of Bell Street is the Grade II* listed Christ Church dating from 1825. The listed building description is attached at appendix 2.

5 Use

- 5.1 Both the City of Westminster college and 29 Cosway Street sites are in community use. The lawful use of both falls within class D1 (Non residential institutions) of the Use Classes Order.

6 Planning History

- 6.1 The City of Westminster College building was originally built as the St Marylebone Grammar School Science block, in the early 1960s. By 1981 this use had ceased and the building was sold and used by City of Westminster College (previously Paddington Technical College) from then. There is no other relevant planning history.
- 6.2 29 Cosway Street and the old school playground have been in use by City of Westminster Youth Service for many years. Temporary planning permission for portacabins in the old playground was granted in 1995. There is no other relevant planning history.

7 Requirements for a primary school in the north of the City

- 7.1 The detailed reasons why a new primary school in the north of the City is required is set out in the draft City of Westminster Report "Planning of Primary School Places to meet demand in the Church Street area", November 2004.
- 7.2 The report contains detailed information on population projections for the Church Street area, and how this translates into requirements for a new primary school and recommends a number of options for its creation.
- 7.3 The most concentrated need is in the Church Street ward, especially around the Lisson Green and Church Street Housing Estates. The report recommends that an option be pursued to create a new primary school on the Penfold Street site of the North Westminster Community School, which would be closed as part of the Council's Secondary Schools Review.
- 7.4 Given the urgent requirement for a new primary school and a lack of appropriate development sites the use of this planning brief site for a primary school is seen as a priority. If other options arise for an alternative location for the new primary school, then a mix of community and residential uses would be desirable.

- 7.5 The draft November 2004 report recommends (alongside a range of other options) the creation of a new 2 Form Entry primary school (420 pupils, 60 per year group) on this site, along with expansion of another school by 1 Form Entry to meet the expected 3 Form Entry demand.
- 7.6 DFES information¹ indicates that a 420 pupil school equates to 2350m² of gross floorspace. The site area of this site is 2103m². A school on this site could however meet the minimum requirements for a school on a constrained urban site, although the options to add a nursery or provide extended school facility would be limited.
- 7.7 There are examples of schools within Westminster that have used innovative design to accommodate schools on much smaller sites. For example, Hampden Gurney Church of England Primary School on Nutford Place accommodates a 240 pupil school on a site footprint of approximately 633m².
- 7.8 This planning brief sets out the UDP policy background assuming that this site is required for a new primary school, and the key considerations that should be taken into account in designing new buildings for the site.

8 Loss of a community facility

- 8.1 Policy STRA19 Local Community Services is the strategic policy for community facilities. The policy states "It is the City Council's aim to protect and encourage an appropriate and accessible range of community facilities and shops which will meet the needs of residents, workers and visitors".
- 8.2 It is possible that the college may consolidate their property holdings and relocate their Cosway Street operation, along with the operations at Paddington Green Centre to one of the sites around Paddington Basin.
- 8.3 If the college decide to dispose of their Cosway Street site, acceptability for redevelopment for other uses would be assessed against policy SOC1 of the UDP, in the context of policy STRA19 above. Policy protects existing community facilities, which includes D1 education uses such as the college and 29 Cosway Street. In applying policy SOC1, where an existing facility is surplus to the needs of the provider, the City Council will ask relevant organisations whether they have any interest in using the facility in question before allowing a change of use from D1.
- 8.4 There is a demonstrated requirement for a new primary school to serve the Church Street area (see above), and the Youth Service also require room for expansion. It is therefore extremely unlikely that a change of use would be granted on this site from D1 to other uses. A change of use of part of the site could be acceptable if another location were found for a new primary school. For example the November 2004 report suggests that a new primary school could be provided at the Penfold Street site of North Westminster Community School.
- 8.5 If this were to happen, the Council would still require any development on the site to include an agreed element of community use under policy SOC1. This could include expanded accommodation for the Youth Service.
- 8.6 If a change of use is allowed, the priority replacement use for all of the site would be housing. The requirements for the form and type of any housing, and the level of associated parking required is set out in section 11 below.

¹ Draft Building bulletin 99: Briefing Framework for primary school projects, DFES, 2004

9 New Community Facilities

- 9.1 The relevant UDP policy for new Community Facilities, including schools is SOC1:B
Community facilities will be required to:
1. Be located as near as possible to the residential areas they serve
 2. Not harm the amenity of the surrounding area, including the effect of any traffic generated by the proposal
 3. Be safe and easy to reach on foot, by cycle and by public transport.
- 9.2 Taking each criteria in turn:
1. It is very near the areas generating demand for a new primary school of the Church Street and Lisson Green Housing Estates. It is one of very few sites in this area likely to be available for use as a new primary school, as demonstrated by the November 2004 report which searched for suitable sites in the area. It is therefore considered to comply with point 1 as it is located as near as possible to the residential area it will serve.
 2. Any application would need to demonstrate how the design of the new primary school minimised the effect on the amenity of the surrounding area, and the application would need to be supported by a Travel Plan and Transport Assessment to ensure that impact on residential amenity from traffic was acceptable. These would also be used to help determine the level of car parking and cycle parking that would be required on the site, as set out in section 10 below.
 3. The site has high public transport accessibility. With the 2 tube stations (Bakerloo and District and Circle Lines) at Edgware Road to the south west, and a large number of buses running up Edgware Road to the West and along the Westway to the south and Marylebone to the east. The site is near the area of most demand which lies to the north. Surrounding streets are relatively quiet, and pedestrians accessing the site from the estates to the north would not need to cross any major roads to reach a new school.
- 9.3 It is therefore considered that subject to an application addressing criteria 2 satisfactorily, the site is generally suitable for a new community facility in the form of a new primary school.
- 9.4 Policy SOC3 specifically regarding education facilities encourages education facilities to be designed so that they can be used for other community uses outside teaching hours.
- 9.5 The Council would therefore require that any new primary school on this site was available for other alternative community uses outside of school hours. The types of alternative community uses, and the hours of operation would need to be addressed through the planning application process, and would be secured by conditions.

10 Transport

- 10.1 The UDP parking policies are set out in policies TRANS21 – TRANS26. The aim of these policies is to control and co-ordinate on-street and off-street parking to reduce the overall level of parking, while maintaining adequate availability of parking space for essential and priority users. New schools are not specifically identified in policy TRANS22, the policy for Off-Street parking for non residential development. Therefore the parking provision that may be required will be determined on the merits of the case (TRANS22(E)).

- 10.2 In the case of a new school, there are likely to be requirements for teacher parking. Consideration should also be given to the need for disabled parking and the demand for parking from shared users of the schools facilities outside of school hours.
- 10.3 Provision should also be made on site for secure cycle parking.
- 10.4 Convenient access should be provided for servicing vehicles, and the servicing needs of the school should be adequately accommodated on-site and off-street.
- 10.5 Provision should also be made for adequate coach pull off or coach parking facilities for the school.
- 10.6 As set out in section 9 above a Transport Assessment that considers all of the above issues will be required as part of an application for planning permission for a new school. The information in the transport assessment would be a major consideration in the determination of an application for planning permission. A Travel Plan and Safe Routes to School Strategy should accompany the Transport Assessment.

11 Policies for housing and associated parking requirements if the site is not required for a primary school.

Housing

- 11.1 The site is outside the Central Activities Zone which means the policy position in terms of replacement use is quite straightforward. The main aim of UDP policy is to maximise the amount of land and buildings in housing use outside the CAZ (STRA12 Protecting and Providing Housing, H3 To Encourage the Provision of More Housing).
- 11.2 The Council expect affordable housing to be provided as part of housing developments (H4 – provision of affordable housing) on sites of 0.5 hectares or over or of 15 or more additional residential dwellings. This site would be expected to provide over 25 units, and therefore the Council would require that 30% of the housing provided is affordable. 25% should be for residents in housing need, with 5% for key workers. (See paras. 3.5 and 3.6 above).
- 11.3 The development should include a mix of unit sizes. The UDP requirement is 33% of housing units to be family sized, with 5% of this family housing to have five or more habitable rooms (H5 – providing a range of housing sizes).
- 11.4 The City Council will expect all new housing units on the site to meet the Lifetime Homes Standard. 10% of the units should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users (H9 – provision of homes for long term needs)
- 11.5 The residential density for this area is 247-494 habitable rooms per hectare. The City Council is generally more concerned that proposed developments meet other policies in the plan than the measure of their housing density. Further advice on density is set out In policy H11 Controlling Housing Density in the UDP.
- 11.6 Provision of gardens and community facilities would be required through policy H10, and outside the CAZ, this normally includes the provision of open space.
- 11.7 Children’s play space and facilities are required to be provided as part of new housing developments which include 25 or more family units. (Policy SOC 6 Children’s Play Provision) This site is not within the Priority Area for additional play space or green open space for play

Parking

- 11.8 Proposals should also provide cycle parking (TRANS11) on the basis of 1 space per unit, and servicing (TRANS20) in accordance with the standards set out in the UDP.
- 11.9 The level of parking provision that would be allowed is set out in TRANS23 for residential developments. TRANS23 currently requires off street parking to be provided on the basis of a maximum provision of:
- 11.10 one car space per unit of residential accommodation containing two bedrooms or less
- 11.11 one or two car spaces per unit of residential accommodation comprising three bedrooms or more, provided that the aggregate provision does not exceed 1.5 spaces per dwelling.
- 11.12 1 parking space for every 10 residential units will also be required to be provided for use by people with disabilities.
- 11.13 The council would not accept the development of this site for car free housing where no parking space was provided.

12 Conservation, Urban Design and Townscape

- 12.1 Lisson Grove Conservation Area, within which this site is situated, is centred on Bell Street and Lisson Grove and comprises predominantly residential terraces, interspersed with a number of institutional developments and some twentieth century infill. The Georgian, Victorian and Edwardian terraces define the character of much of the area while a number of larger developments such as Christ Church, St Edward's Convent School and Manor House, are key components which add townscape interest and provide focal points in views. The character and appearance of the conservation area would need to be preserved and enhanced by development proposals.
- 12.2 To the south of the site, on the other side of Bell Street is the Grade II* listed Christ Church. This church is important in townscape terms, and retaining its prominence would be an important consideration in any proposals for the form of replacement development on the planning brief site. There are no other listed buildings adjacent to the site. but it is within the Lisson Grove Conservation Area,.
- 12.3 The former school caretakers building makes a positive contribution to the character and appearance of the conservation area, and the Council will require it to be retained as part of redevelopment proposals.
- 12.4 Conservation Area Consent will be required for the substantial or total demolition of the playground wall. While this wall has no inherent architectural character, it is an old and characterful structure. Redevelopment proposals should seek to retain the wall (in part or whole) if possible and if it would not conflict with the form of the new development. If the layout of any new buildings required the removal of the wall, and the proposals were acceptable, the demolition of the wall may be acceptable, although justification for its removal would be required.
- 12.5 If a planning application were submitted as a Council own development application, a decision on the demolition of the wall would be made by the Secretary of State.
- 12.6 The existing City of Westminster College building is identified in the Lisson Grove Conservation Area Audit as having a negative impact on the character and appearance of the conservation area. Its redevelopment is therefore acceptable in principle, although Conservation Area Consent would be required.

- 12.7 Vistas to the site should be regarded as key local views and will be considered when assessing development proposals for the site.
- 12.8 The site lies just outside the Paddington and Lillestone area of archaeological interest.
- 12.9 There are some trees on the site that should be regarded as an environmental asset. Should proposals should come forward to remove them, then replacement tree cover or enhanced landscaping will be expected.

13 Design of new buildings on the site

- 13.1 Historic maps show that the original school that stood on this site was located at the northern end of this site. Although this could be an appropriate location for new buildings, it is not the only option. The bulk of the building could be located on the southern side alongside the retained 29 Cosway Street, which may mean any effect on properties adjacent to the site in terms of loss of sunlight is minimised.
- 13.2 However this draft brief does not attempt to be prescriptive at this stage regarding the layout of buildings on the site.
- 13.3 From the above analysis it is considered that the following parameters should inform the design of buildings on the site:
- Impact on amenity, including daylight and sunlight and overlooking of adjacent residential properties;
 - Retention of 29 Cosway Street;
 - Retaining the prominence in the townscape of the Grade II* listed Christchurch to the south of the site;
 - Development across the site of up to 10-12m in height (approximately 4 residential storeys);
 - Suitable play space in sunshine and shaded areas should be provided, with appropriate landscaping;
 - Impact on townscape and the surrounding Conservation Area and the context of existing buildings around the site;
 - Energy efficient design and use of sustainable building materials.

14 Form of Application

- 14.1 The council would require a full planning application for development of this site, as it is within the Lisson Grove Conservation Area. Conservation Area consent would be required for demolition or substantial demolition of any of the buildings on the site, or the playground wall.
- 14.2 Applications should be accompanied by a number of supporting reports including:
- Planning Statement
 - Design Statement
 - Daylight / Sunlight Study
 - Transport Assessment (including Travel Plan and Safe Routes to School Strategy)
 - Environmental Performance Statement
 - Access Statement

15 **Contacts**

Department of Planning and City Development

Graham King	Head of City Planning	020 7641 2749
Chris Mason	Policy, UDP and planning brief issues	020 7641 2286
David Clegg	Design issues	020 7641 3014
Jim Thomson	Planning Applications: Land Use and Development Control	020 7641 2485
Brent Turton	Construction Impact Management	020 7641 2581

Department of Environment and Leisure

Don Murchie	Transport policy issues	020 7641 2517
Roger Neville	Access Officer	020 7641 2688

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Appendix 1

Bibliography / Other relevant documents

PPG3 Housing

PPG13 Transport

PPG15 Planning and the Historic Environment

The London Plan – Spatial Development Strategy for Greater London (February 2004)

City of Westminster UDP (December 2004)

City of Westminster UDP (January 1997)

Civic Renewal Programme (September 2001)

The City Plan (Westminster's Community Strategy) 2002

City of Westminster Supplementary Planning Guidance

Sustainable Buildings (March 2003)

Design Matters (October 2001),

Appendix 2

Christchurch listed building description

TQ 2781 NW 42/1	CITY OF WESTMINSTER	COSWAY STREET, NW1 (west side)
10.9.54 -		Christ Church II*

Church. 1824-5 by Phillip Hardwick. Additions/alterations of 1887 by Sir A W Blomfield. Brick nave with ashlar dressings, ashlar portico and tower. Classical style. Reversed orientation. Nave and chancel of 8 bays with single bay projection. Portico to east surmounted by tower. Ionic tetrastyle portico with pediment and balustraded parapet flanked by pedimented windows. Paired Ionic columns to portico returns. 3-stage tower with square Ionic peristyle with cylindrical core rising into octagonal cupola with volutes. To body of church round-headed windows in architraves with continuous sil band. Balustraded parapet. Oculus to gable of single-bay projection. Interior 8-bay Corinthian arcade, clerestory windows above entablature cut into the low arched ceiling with ribs and oval panels. Galleries. Corinthian pilasters to east wall. Church redundant at time of resurvey. Interior not inspected.

BFL Clarke Parish Churches of London, p128.

Appendix 3

A Short History of City of Westminster College

City of Westminster College can trace its history as a distinct organisation back to September 1903, when the Paddington Technical Institute opened for business at its Saltram Crescent premises. It was the first of its kind in London.

In the Beginning

Sidney Webb, Fabian and Socialist, was Chair of the Technical Education Board of London County Council, which opened the Paddington Technical Institute in September 1903, with Dr Ryan as Principal. It taught Physics, Chemistry, Engineering, Building, Domestic Economy, and Dressmaking. In addition, non-vocational education was also on offer to boys and girls.

Wars and politics

The onset of World War in 1914 disrupted the College, but also acted as a catalyst for action on the need to widen the opportunity for post-school education. Later, during the 'thirties there were nearly a thousand students (many attending evening courses), three Heads of Department, twenty full-time teachers and twenty-seven part-timers. That it was gaining a good reputation as a provider of education was attested to by the keen competition for scholarships - in March 1938 there were 74 applicants for the 30 available.

Our Centres

Over the years the College has occupied a number of buildings, particularly in the seventies, and each with a slightly different history:

Beethoven Street, W10 was acquired by the College in the early sixties and provided courses there until 1997, when it was sold. However, we still teach short courses to the local community in what is now known as Beethoven Street Centre.

Ladbroke Grove, W11 The College acquired what had been a local Secondary School for Girls in the seventies. The centre was sold in 1997 and it now houses a private leisure and health facility.

Amberly Road, W9 This well-known site for Westminster Adult Education Institute provided a base for our School of Photography from 1985 until 1995, when photographic studios were established at Paddington Centre.

Samford Street, NW1 This centre provided a base for the Chelsea School of Chiropody throughout the seventies and eighties, until the work was transferred to the Polytechnic of Central London (later to become University of Westminster) in the late eighties.

Saltram Crescent, W9 Our Queens Park Centre, as it is now known, was the base for the original Paddington Technical Institute. Built in 1893 it was purchased by the LCC from the Saint Augustine Sisters in 1903 and became the first full-time Technical Institute in London.

Elgin Avenue, W9 Our Maida Vale Centre, as it is now known, was formerly the Paddington and Maida Vale High School for Girls and was leased to the College in 1982.

Paddington Green, W2 Our Paddington Centre, together with Samford Street, formed what was known as Paddington Technical College when this new purpose-built building opened in 1967.

Cosway Street, NW1 This Centre was formerly part of Marylebone School and the College acquired it in the seventies. It now houses our professional science courses and provides a base for our Training and Community Partnerships

Cockpit Theatre, NW1 The College took responsibility for the Cockpit Theatre after the Inner London Education Authority was abolished in 1990. It now provides a fantastic resource for our Performing Arts, Sound and Lighting students and a great venue for local and regional performances.



Our Names

In our history we started life as Paddington Technical Institute, at Saltram Crescent, until 1967, when, together with Paddington Green, it became Paddington Technical College, and from 1984, Paddington College. When the Inner London Education Authority was abolished in March 1990 the College was governed by Westminster City Council. It was then that we took our present name - City of Westminster College. On 1st April 1993 City of Westminster College became an incorporated and self-governing organisation, occupying five spaces in the borough of Westminster.

PAST PRINCIPALS

Dr Ryan 1903 - 1914

Mr Cooke 1914 -1929

F.H. Reid 1929 - 1939

Dr Robinson 1939 - 1947

A. T. Lindley 1948 - 1970

A. W. Thompson 1970 -1975

S. F. Everiss 1975 - 1976

Margaret Rawlins 1976 - 1977

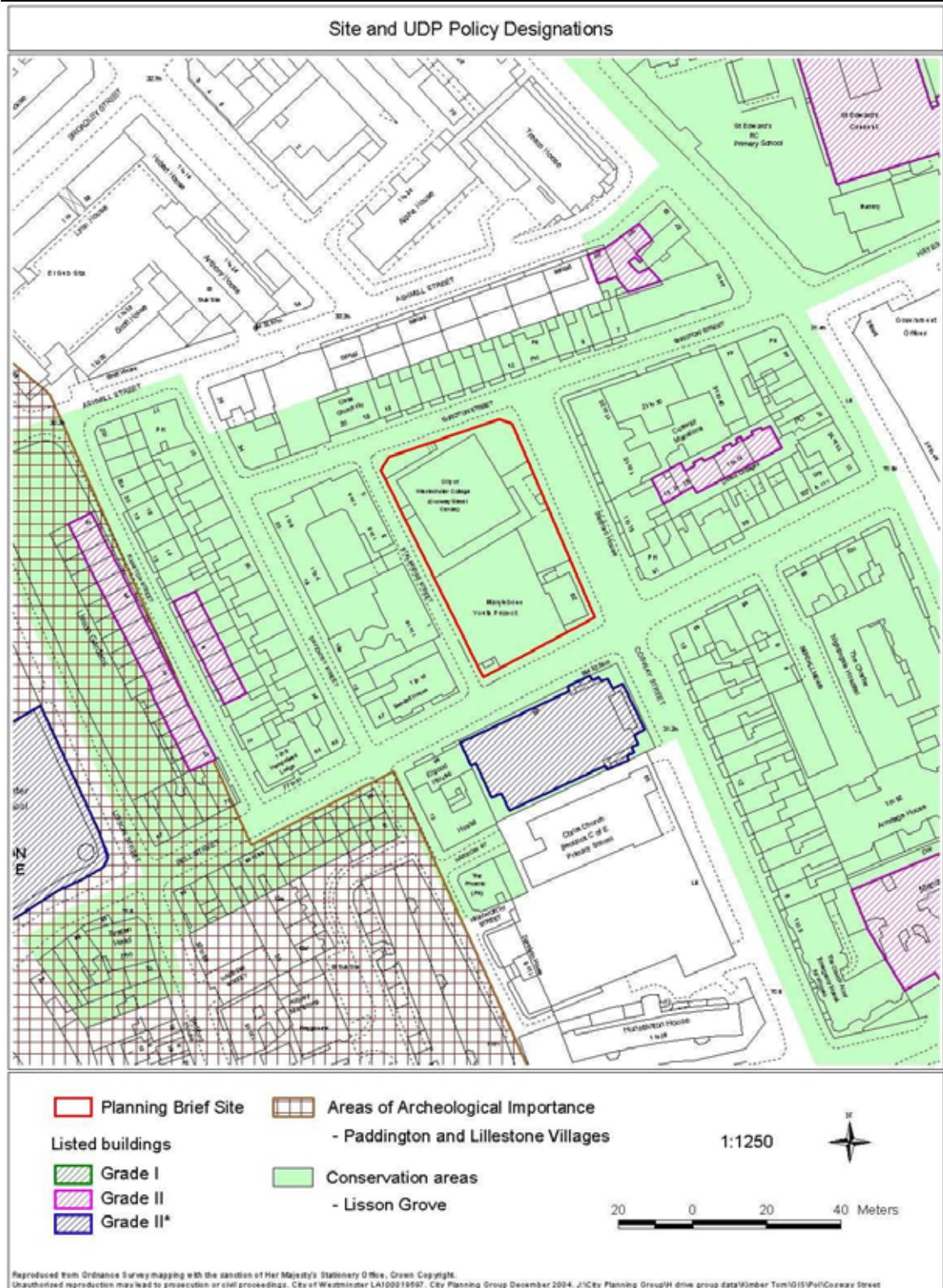
Alan Hutchinson 1977 - 1987

Janey Rees 1987 - 1990

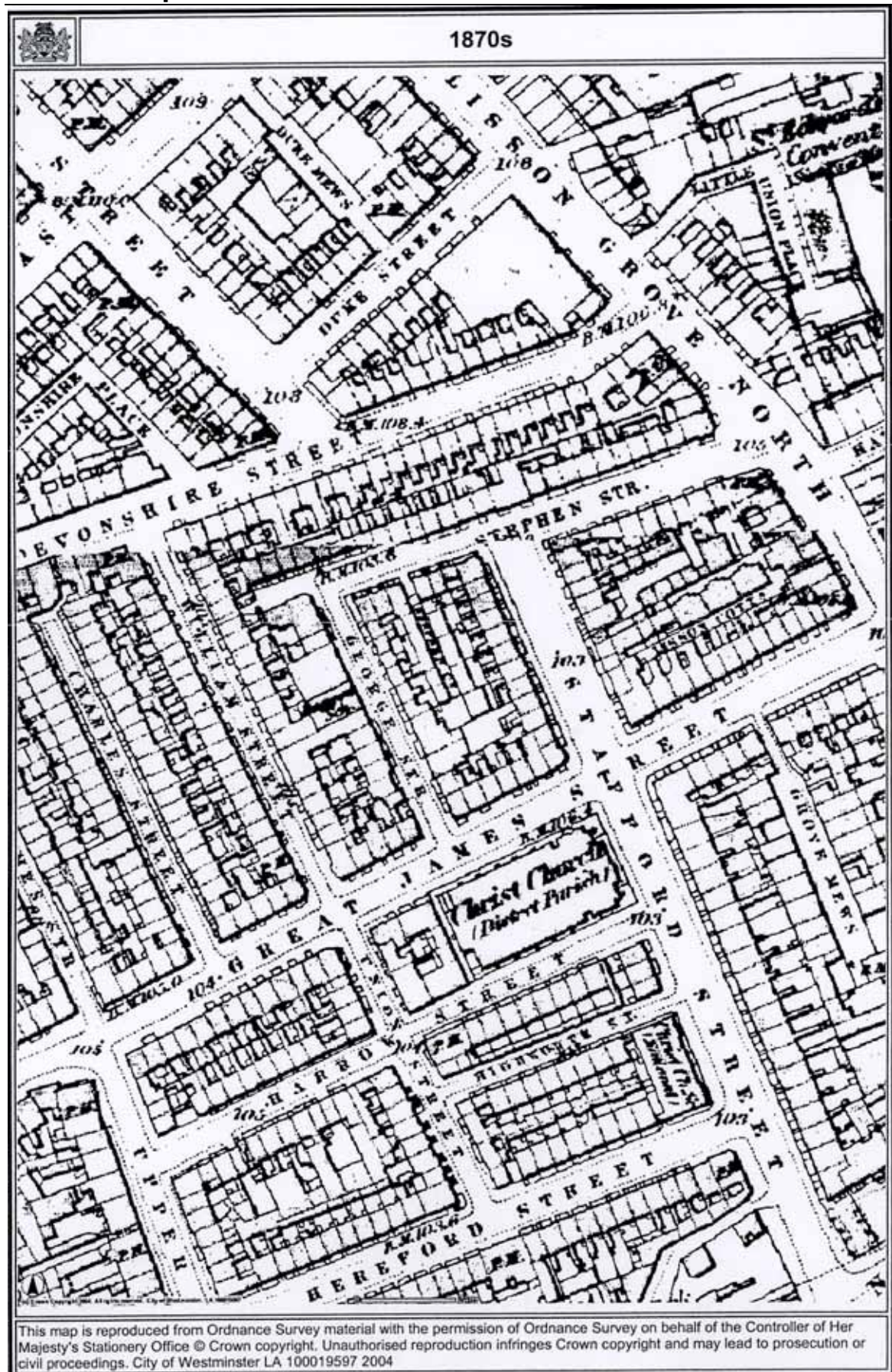
Paul Bellamy 1991 -

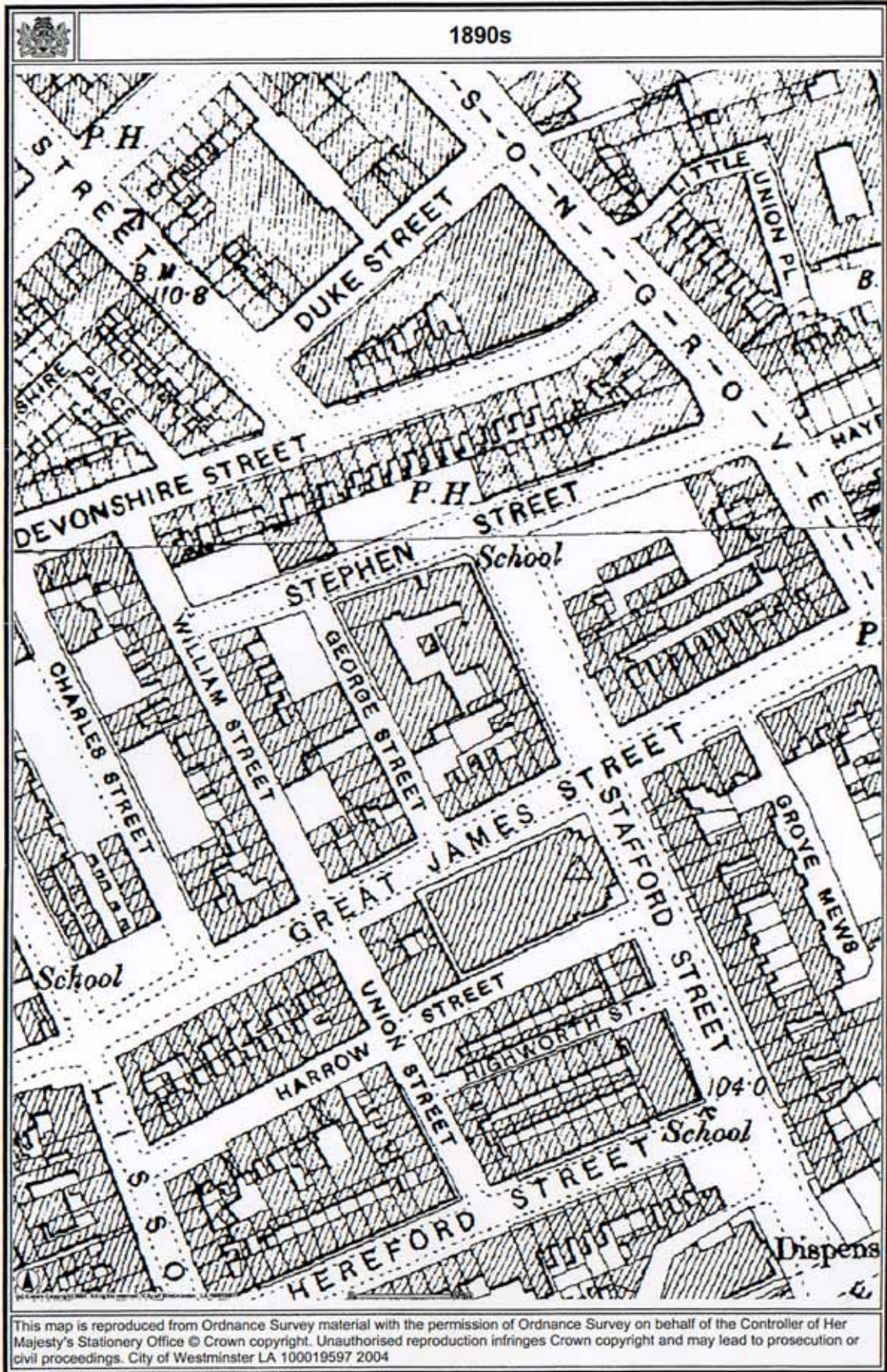
From City of Westminster College website: www.cwc.ac.uk

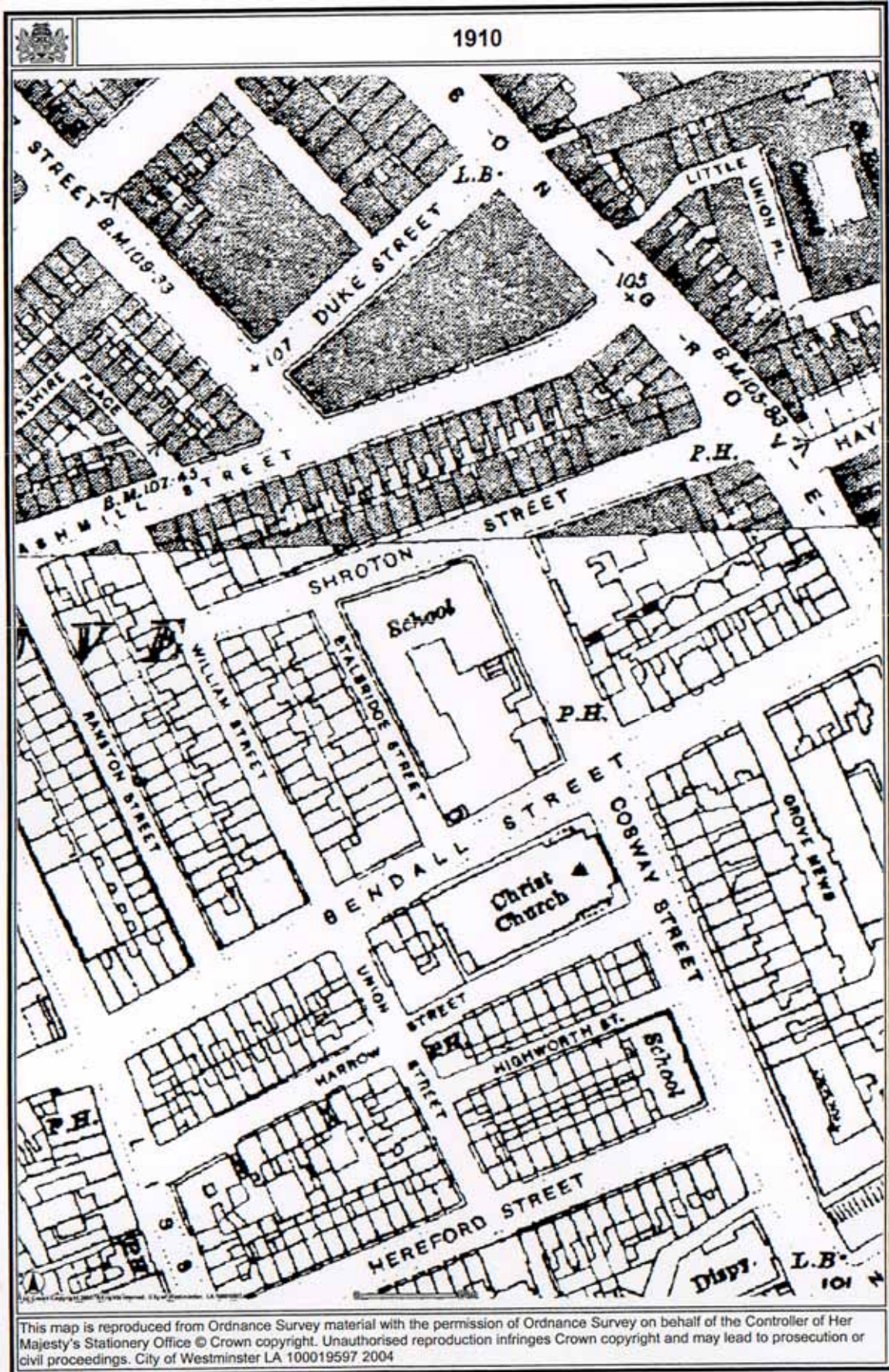
Map 1 Site and UDP policy designations



Historic Maps







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