

CITY PLAN 2019 – 2040

CONSULTATION STATEMENT

REGULATION 19 JUNE 2019

Executive Summary

City Plan 2019-40 sets out the council's ambitious vision for Westminster to be a city of excellence in all areas. Once adopted, it will serve as the council's key strategic planning document and fully replace the currently adopted City Plan (2016) and the saved policies from the Unitary Development Plan (2007). As is our statutory duty, we have undergone a rigorous process of consultation with a broad range of stakeholders and partners which included government bodies, neighbouring boroughs, landowners and developers, as well as those living and working in Westminster. The purpose of this was two-fold: to communicate policy objectives and to allow a platform for response. This, in turn, has helped inform our approach.

Informal consultation

Between 12th November and 21st December 2018, a draft City Plan 2019-2040 was published for informal (non-statutory) consultation in order to garner views ahead of formal consultation. Around 900 consultees on our database were notified including all ward councillors, Neighbourhood Forums, statutory bodies, residents and public agencies. This stage of consultation was advertised on the council's website and across social media, and hard copies of the City Plan and the Policies Map were made available at the council offices and local libraries. A consultation launch event took place on Monday 12th November 2018; 68 stakeholders attended. During the consultation period, the draft plan was discussed with a wide range of stakeholders and at numerous 'duty to cooperate' meetings. It was also presented to the Economic Development, Education and Place Shaping Policy and Scrutiny Committee, where recommendations were made.

During the informal consultation, the council received 182 responses; the highest proportion of which (28.5%) were from developers, landowners and estate companies. In terms of the plan's Spatial Strategy, issues raised included the need for greater emphasis on Westminster's world city status; this has since been incorporated into the new draft. Feedback relating to spatial policies on key growth areas, and in particular the WERLSPA boundary, has led to amendments which

better reflect core areas of mixed-use and policies. Wording is now clearer in relation to commercial growth within the Central Activities Zone (CAZ). There was also a call for 'greater ambition' for Paddington, particularly given the opening of Crossrail. However, the suggestion to amend the Opportunity Area boundary to include more sites was rejected, as development potential in the surrounding areas has been recognised through other changes within the Plan.

The draft plan's Housing policies were broadly supported including 35% affordable housing delivery target, the restriction of short-term lets and innovative housing delivery. There was a suggestion that the upper size limits for residential units were too restrictive and these have been revised accordingly. Similarly, concerns that requirements for affordable housing contributions from hotel developments were overly restrictive have been addressed. Amendments to the policy make it more viable, whilst still delivering the core objective of delivering more affordable housing in the CAZ. The main concerns regarding housing policy have been addressed through revised targets and greater clarity within the policies.

Attitudes to policy did, as expected, vary depending on respondents. There was a feeling from some consultees that policy should not allow for any net loss of office floorspace from the CAZ, whilst others wanted more scope for conversion to other uses. Our position remains that loss of office floorspace is not sustainable and protection is therefore required. Policy, however, has been amended to recognise the limited circumstances where office space loss could be supported.

Requests from consultees for greater flexibility for uses across town centres have been supported through policy which promotes the evolution of town centres and protects their primary retail function. We have introduced a specific policy in response to comments that the important role higher educational institutions play in our economic growth was not being recognised. Some respondents requested the inclusion of occupier and business rates, levels of policing and licensing arrangements. However, these are not controlled through the planning process, so do not fall within the remit of the plan.

Our Special Policy Areas have been generally well supported. We took on board comments that Soho's LGBTQI+ character was not being adequately represented or protected, and have since amended policy to better protect the integrity of this rich,

vibrant area. We listened to concerns that the Portland Place Special Policy Area was perhaps a little outdated and after a thorough review we have removed this policy.

In terms of policy relating to the Connections chapter, there was a call that any school expansion onto school playing fields should be prohibited. Whilst this sounds reasonable, we have had to reject this, as in some instances it may be that expansion is the only way to fulfil high demand for school places. In these circumstances we would seek to ensure any such expansion would be coupled with appropriate investment in the school's sports provision.

Our renewed focus on active travel was welcomed, but it was felt that safe cycling routes could be more ambitious. A new Walking and Cycling Policy details increased safety measures. There were also various concerns around parking. Some consultees felt policy did not align with the London Plan, and that existing on-street parking should be removed. Through an evidence-based approach we have found that on-site car parking is necessary to negate kerbside stress. There was also a suggestion that the resident parking permit scheme should be reviewed to reduce the number of cars. Whilst the distribution of permits is not for the City Plan to legislate upon, we will keep these under review.

The Environment policies have been redrafted to further align with the draft new London Plan and address Westminster specific challenges. In response to feedback, air quality neutral requirements have been made more ambitious and requirements for air quality assessments have been clarified. The approach to managing local environmental effects has been expanded by the inclusion of vibration and odour and strategic waste management issues have been addressed through a new policy. To reflect the latest Strategic Flood Risk Assessment (SFRA), the approach to flood risk has been updated. The protection and provision of different types of green infrastructure and the approach to district energy and energy efficiency have been clarified and brought in line with London policy.

In response to feedback, Design and Heritage policies have been redrafted to include more positive and comprehensive wording on heritage assets, and to be more Westminster-specific. As requested, we have also included references to design for active lifestyles, retrofitting and 'good growth'.

It was felt that too much weight was being given to heritage assets under the previous policy, and as a result design and innovation were being unduly constrained. However, this redraft was done in response to feedback from the informal consultation in 2018, where many respondents found the more simplified version to be too pared back. We have reviewed all responses again and found an appropriate balance of detail for the next round of consultation. For example, our policy approach to the World Heritage Site, to alterations, and extensions and to views, have been strengthened. We have also simplified our policy on basement development and taken a more positive approach to building height.

A number felt that the council could have a more proactive approach to local character and welcomed further discussion about new growth areas. We are happy to continue this dialogue as our heritage remains an area of strategic importance. As a global city, and unparalleled tourist destination, protecting it is not just desirable, but essential.

Regulation 18

The formal Full City Plan Revision (Regulation 18), was carried out between 16th June and 28th July 2017. The council emailed 671 consultees from our database regarding our intention to undertake a full review of all policies in Westminster's City Plan (2016) and saved UDP policies. Hard copies of the draft City Plan and Policies Map were also made available in every Westminster library and at the council's offices. A total of 51 responses were received and evaluated. Overall, there was general support for a comprehensive review of the City Plan and greater simplification and flexibility in planning policies was welcomed.

Consultees felt that our Strategic Objectives should be updated to include references to pollution and congestion, clean air and green space, and the reduction of noise and disturbance. Improving air quality is a particular priority for the council and has greater prominence in the revised City Plan.

In general, there was good cross-sector support for our housing policies. A proposal to flip the proportion of social and intermediate housing from 60% social and 40% intermediate received strong support. There was, however, concern that the target of

25% of all new homes being family sized did not best address housing need, and a figure of 33% would be more appropriate. Conversely, there was concern regarding the potential loss of single residential units, as these provide much-needed accommodation to a different demographic.

The availability of land is a constant challenge in Westminster. It was suggested that joint work across the public sector (One Public Estate) and an audit of available development land and buildings was necessary. There was a suggestion that the focus of our housing delivery should be outside the CAZ. Whilst there is a strong drive to retain and grow our housing stock, concern was expressed as to the negative impact densification could have on social and community functions. Some developers were wary of any amendments as they consider current policy to be working effectively.

Maximising space in our city will remain an on going challenge, especially when we take into account our projected population and economic growth. One of the ways we are looking to achieve this is through an increase in building heights. Some consultees were sceptical of this approach, commenting that there was too much of an assumption that increased building height is the only way to achieve greater floorspace.

Local residents expressed concern over the proposed relaxation on entertainment uses, with a call for tighter control especially in current stress areas. Conversely, businesses were largely supportive of this more positive approach to strengthening our night-time economy through a diverse social, leisure, retail and cultural offering. That said, they do appreciate the need to find the right balance in the vitality of a town centre, in order that it has an enhancing rather than detrimental effect on the lives of its residents.

Representatives from Neighbourhood Forums felt that they were not being adequately supported, as per the requirements of the Localism Act 2011. They requested greater autonomy to bring forward non-strategic policies through Neighbourhood Plans. We fully respect regulations regarding Neighbourhood Forums and welcome the contribution made by Westminster's residents. We have taken these comments on board and to assist Neighbourhood Forums, the City Plan now states which policies are strategic.

Consultees asked how the revised City Plan will help mitigate against the impacts of development such as car parking and freight transport, and to indicate the minimum requirements for cycle parking. An assessment of transport impacts in accordance with TfL guidance was also requested. There was strong support for policy which encourages greater pedestrian movement and enhanced public realm.

Climate change is an issue which effects every city in the world. Consultees stressed the need for 'zero air emission' buildings, and a broader focus on ways in which sustainable development can mitigate against climate change in the city. It was recommended that we update the existing SFRA as the draft policies were not considered to endorse the recommendations from the Thames Estuary 2100 (TE2100) Plan. Some consultees also felt that not enough attention had been given to water supply and waste water.

Landowners were generally supportive of a review of the West End boundary: i.e. aligning the CAZ boundary with the Mayor's CAZ area and removing the Core CAZ designation. The expansion of the West End Retail and Leisure Special Policy Area (WERLSPA) will promote retail, leisure, offices and other commercial uses. Consultees were also keen for greater provision of 'affordable workspace', particularly in the Core CAZ where increased rates and higher rents are not conducive to business growth or viability. We are looking to achieve this through shared spaces within new developments and support for growth in this sector.

Overall, stakeholders were positive about the Regulation 18 consultation. We welcome all constructive feedback and the process helped us identify policy areas which required further clarity or development.

Booklets

The council published 19 topic-based booklets between 2013 and 2015, which enabled us to test our policy approach with an even broader range of stakeholders.

In terms of housing policy, whilst there was broad support for higher densities in the CAZ, a number of consultees did not support the delivery of family size homes. It was also felt that some requirements (e.g. space, quality, daylight) were too

prescriptive. The general consensus overall is that policy should be relaxed to allow for the development of more affordable homes. However, the relaxation of one policy has a knock-on effect on the objectives of others, so as a council we have to look at how this can be achieved in context.

Restricting new hotels and guest houses to non-residential areas was welcomed. It was felt, however, that policy regarding the night-time economy lacked clarity. A number of consultees expressed concern that the current mixed-use policy could hamper delivery of new employment space. We were also asked to consider greater flexibility for retail space and policy now allows for this where it is supportive of the wider retail function.

Although improving environmental performance through design was largely welcomed, the point was raised that small scale sites may be refused development as carbon targets are not always easy to achieve. Responses also suggested that the relationship to the Government's Zero Carbon targets was unclear. There was, however, strong support for our objective to reduce energy emissions by maximising renewable energy. Policy on planning and pollution control was generally supported, but we have been asked to include a requirement that outside areas for food, drink and entertainment adhere to the same restrictions on noise levels indoors, which has been taken into account.

The health, safety and wellbeing of the people who live, work and visit our city remains paramount. There were multiple concerns raised regarding the dangers to cyclists on our roads and the dangers posed by cyclists on pedestrians. Consultees also requested a greater mention of river transport.

As this report shows, the council has carried out a robust period of consultation between 2015 and 2019 to fully garner opinion from our residents, stakeholders and partners. This feedback has informed the policies and approach to strategic planning set out in the City Plan 2019-2040.

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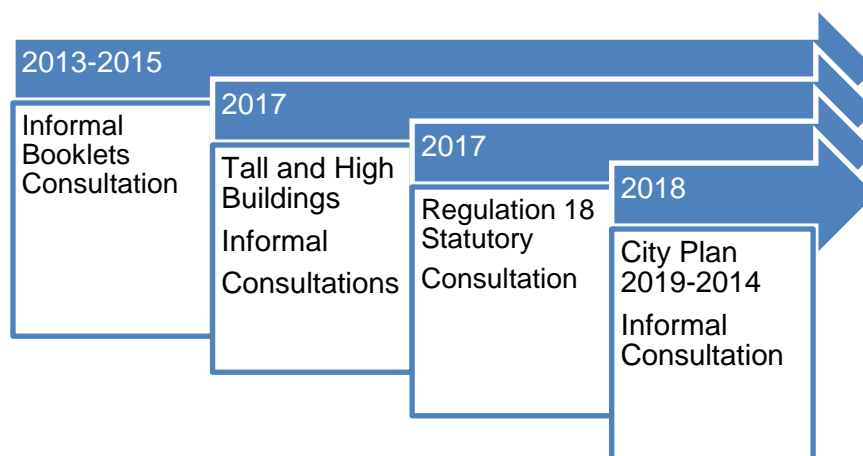
1 Introduction

This document summarises the consultation undertaken for the full revision to Westminster's City Plan. It also details how the revised City Plan 2019-2040 has been prepared in accordance with the council's statutory duty to co-operate. This joint statement has been prepared to meet legal requirements¹ and must accompany the revision itself when it is made publicly available and submitted to the Secretary of State. It also helps inform the independent Inspector appointed to examine the Revision and advise whether it is 'sound'.

The Westminster City Plan was first adopted in November 2013 and has been subject to several partial revisions. The latest version of the City Plan was adopted in November 2016 and includes the Special Policy Areas and Policies Map Revision, as well as the previously adopted Basements revision and the Mixed-Use revision.

This full revision of the City Plan updates the strategic planning policies in the City Plan and fully replaces saved policies from the Unitary Development Plan (2007). It takes account of several years of engagement and consultation with the purpose to update Westminster's planning policies. Initially, detailed development management policies were being developed as a separate Development Plan Document (DPD) to be called the 'City Management Plan' (CMP). Consultation on policies intended to form this separate DPD have informed the policies in the City Plan 2019-2040.

On the one hand, this statement covers the consultation responses at the formal consultation stages². It sets out who was consulted, for how long and how they were invited to make representations. A summary of the key issues raised by the responses is also provided and details as to how these representations have been considered in the new draft City Plan 2019-2040. All consultations were carried out in compliance with the council's Statement of Community Involvement³.



¹ Regulation 22 of the Town and Country Planning (Local Development) (England) Regulations 2012 ("The Regulations"), Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and National Planning Policy Framework (2018).

² Regulation 18, which notifies people of our intention to revise the plan and Regulation 19 which is the formal, pre-submission consultation

³ This is a legal requirement under Regulation 19 of the Planning and Compulsory Purchase Act 2004 (as amended)

On the other hand, this statement explains that the new draft City Plan 2019-2040 has been produced in accordance with its statutory duty to co-operate. The council has engaged with its stakeholders and residents during the production of the new Plan. In line with legislation, the council has also produced a Statement of Common Ground with its key partners covering planning matters of strategic and cross-borough significance.

This joint report will be updated following the pre-submission consultation taking place between the 19th June and 31st July 2019 to take account of any representations made under Regulation 19.

2 Consultation processes

2.1 Informal consultation (2018)

A draft City Plan 2019-2040 was published for informal consultation between 12 November and 21 December 2018, for a period of just over six weeks. The goals of the informal consultation were to obtain the views of Westminster's stakeholders, residents and statutory consultees in relation to the council's revised planning policy approach and spatial strategy for Westminster ahead of formal consultation.

2.1.1 Notification

Emails and specifics letters

Notification was made by email to the vast majority of consultees that were on the council's planning policy database⁴. About 900 consultees were consulted together including:

- all specific consultees including the Mayor of London, Historic England, Thames Water, Network Rail, the Environment Agency, Natural England, the Homes and Communities Agency, the National Health Service, the Marine Management Organisation, the Highways Agency and the Coal authority,
- all ward councillors,
- all neighbouring boroughs,
- all neighbourhood forums,
- and other specific consultees.

A copy of the email is attached as Appendix 1. A small number of personalised emails and letters were also sent to a number of the consultees.

Launch event

The council organised a consultation launch event that took place in the Westbourne Park Baptist Church building site on Monday 12 November 2018. Cllr Nickie Aiken (Leader of the Council) and Cllr Richard Beddoe (Cabinet Member for Place Shaping and Planning) presented to the audience the draft City Plan 2019-2040 and welcomed questions from the audience.

The council invited a wide range of stakeholders to attend the meeting and 68 external stakeholders actually attended. A list of attendees is attached as Appendix 2 and the speech can be read online⁵.

⁴ The information on the planning policy database is updated on a continual basis, with contacts being added, removed or amended on request.

⁵ https://www.westminster.gov.uk/sites/default/files/city_plan_speech.pdf

The attendees were provided with a pen drive containing the draft City Plan 2019-2040 and a copy of the document setting out the council's approach to planning policy over the next decades. The summary document can be read online⁶.

Website

The council's website advertised this stage of consultation on the page relating to the Revision to Westminster's City Plan (a screenshot of the website is attached as Appendix 3). It was also advertised on a new website specifically about the consultation process (a screenshot of the website is attached as Appendix 4).

Social media

During the consultation process, a number of posts and videos in relation to the City Plan 2019-2040 were posted online and promoted on social media. A series of tweets published using the council's Twitter account included links to the City Plan consultation website as well as promotional videos. Figure 1 shows how the council's tweets were read and shared by a large amount of people.

Figure 1 - City Plan activity on Twitter (informal consultation)

Social media network	No. tweets	Overall impressions ⁷	Overall engagement	Average impression per tweet
Twitter @CityWestminster	8	21,345	634	2,668

Hard copies

During the consultation process, a hard-copy of the draft City Plan 2019-2040 and of the Policies Map was available to be viewed at all Westminster's libraries.

Copies of the documents were also available at Westminster's offices at 5 Strand and Portland House, Victoria.

Media coverage

The City Plan 2019-2040 was covered in the media and articles about its revision and specific draft policies were published in several newspapers including the London Evening Standard, the Guardian, The Telegraph, the Daily Mail and The Times (screenshots of some articles are attached as Appendix 5). Planning and architecture magazines such as the Planner also published articles in relation to the new draft City Plan 2019-2040 policies.

Most of the press around the City Plan 2019-2040 positively focused on the restriction on 'mega-homes' although a wide range of policies were also covered.

Meetings, workshops, presentations and the duty to co-operate

⁶ https://www.westminster.gov.uk/sites/default/files/city_plan_our_approach.pdf

⁷ Impressions are the number of times a tweet has been displayed, no matter if it was clicked or not.

During the consultation process, a number of meetings and engagement events were organised by the council. The goal of all these meetings was to engage with a wide range of stakeholders and partners and obtain their views in relation to the emerging planning policies. Officers also participated in workshops with local councillors, Neighbourhood Forums and Amenity Societies. A number of public debates took place on the City Plan policies including events organised by New London Architecture and Westminster Property Association.

A number of meetings were carried out in compliance with the council's duty to co-operate. The draft policies in the City Plan 2019-2040 were discussed with all neighbouring boroughs (Lambeth, RBKC, Wandsworth, Camden, City of London and Brent) and Southwark, the Greater London Authority, Transport for London, Thames Water and Historic England. Further details on how the council has met the duty to co-operate can be found in the duty to co-operate Statement.

Scrutiny Committee

On 30 January 2019, the draft City Plan 2019-2040 was discussed at the Economic Development, Education and Place Shaping Policy and Scrutiny Committee. A paper was presented that focussed on the theme of economic growth and more precisely on the plan's approach to:

- town centres and high streets,
- driving economic opportunities in the North West Economic Development Area (NWEDA),
- protecting against further loss of office space and
- creating new job opportunities for Westminster's residents.

The paper discussed and the meeting's minutes can be read online⁸.

External expert witnesses spoke at the meeting including representatives from Gieves and Hawes, Arup and London First. The approach within the draft City Plan 2019-2040 was endorsed by the committee. The committee acknowledged the importance of creating employment opportunities for Westminster residents, welcomed the policies supporting economic growth in line with the priorities of City for All and requested to be updated on the implementation of the strategies to promote the NWEDA.

2.1.2 Respondees

Submission of responses

The dedicated website for the consultation process contained a link to an online consultation form created using Smart Survey (a screenshot of the form is attached as Appendix 6). A PDF version of the form was also available to be downloaded (a screenshot is attached as Appendix 7). The council welcomed online responses but also representations made via email to planningpolicy@westminster.gov.uk and letters sent to council offices at:

City Plan 2019 - 2040 Consultation
Westminster City Council

⁸ <https://committees.westminster.gov.uk/ieListDocuments.aspx?MId=4676&EVT=105>

6th Floor, 5 Strand
London
WC2N 5HR.

Responsees and responses received

The council received 182 responses.

- 22 responses were received online and via email,
- 46 responses were received only online,
- 114 responses were received only via email, and
- a small number of letters were also received.

A list of responsees is attached as Appendix 8. Figure 2 shows the types of consultees who responded:

Figure 2 – Number of responses by consultee type (informal consultation)



2.1.3 Summary of key issues and how these have been taken into account

Figure 3 - Summary of key issues and how these have been taken into account (informal consultation)

Policy	Key issues identified	Council's response
Chapter 1 Spatial Strategy Policies		
Policy 1 Westminster's spatial strategy	<ul style="list-style-type: none"> • Role of neighbourhood planning should be recognised • Greater recognition of Westminster's world city status, heritage and uses of national and international importance should be included • Greater emphasis should be provided on the importance of the natural environment and securing a shift towards active travel • The international importance of the West End and Knightsbridge should be given greater prominence • More detailed proposals for the North Bank should be provided 	<ul style="list-style-type: none"> • Additional information on neighbourhood planning in Westminster provided in context and implementation sections of the plan • Increased emphasis on world city status and importance of heritage, including recognition of uses of national and international importance • Greater emphasis on improving the public realm, natural environment and prioritising sustainable travel inserted • Recognition of the importance of the West End and Knightsbridge International Centres inserted • Detailed proposals and feasibility work for the North Bank are yet to be undertaken – policy focusses on the broad aspirations for this area and indicates an SPD will be drafted for this area
Policy 2 Spatial Development priorities: West End Retail and Leisure Special Policy Area (WERLSPA) and Tottenham Court Road Opportunity Area	<ul style="list-style-type: none"> • Some suggestions that majority of commercial growth should not be directed to this area and that residential should be identified as a priority use • Some requests for policy to cover non planning related matters such as licensing and a district management plan • Some requests for further flexibility for off-site delivery of affordable housing • Alterations of WERLSPA boundary suggested • Further guidance should be provided on jobs growth sectors 	<ul style="list-style-type: none"> • Clarified that growth in the area will be commercial led, and that this includes hotels (given the importance of the visitor economy and proximity to major tourist attractions) • Policy seeks to focus on matters that can be addressed through the determination of planning applications • The council's priority across Westminster is for on-site delivery of affordable housing (except within the international centres) for mixed-use developments

	<ul style="list-style-type: none"> • The need for growth beyond intensification of existing spaces should be explicit • Oxford Street provided scope for significant commercial growth • Proposals for Tottenham Court Road Area should be more ambitious and refer to the potential Crossrail 2 offers • Policy should seek to ensure development in the area achieves 'good growth' 	<ul style="list-style-type: none"> • WERLSPA boundary adjusted to better reflect core areas of mixed-use character • Additional narrative on jobs growth sectors provided, and the need for additional building height to deliver growth (including along Oxford Street) • Clarified ambitions for Tottenham Court Road, and that as a mature Opportunity Area, much of the growth planned for Tottenham Court Road in the London Plan has already been achieved • Inserted explanation of what 'good growth' means in the context of the West End
Policy 3 Spatial Development priorities: Paddington Opportunity Area (POA)	<ul style="list-style-type: none"> • Greater recognition of the opportunity for large-scale regeneration, place-making and connectivity at Paddington, given the opening of Crossrail. • Suggested amendments to the Opportunity Area boundary to include: the Paddington Green Police Station site and the site to the north of it; the Edgware Road Underground Station (H&F line); and part of Paddington New Yard (KDS 7), which includes the Royal Oak site. • The upper storey limit is not appropriate as some buildings in the vicinity have more than 20 storeys and some have consent for up to 42 storeys. • The increasing pressures on Paddington station and the continuing shifting dynamics of the station and the wider area should be recognised. • The development opportunity at St Mary's Hospital site should be further recognised. No rationale is provided for the low homes target in St Mary's Hospital sites in the Key Development Sites appendix. • Cycling should also be referred to in point 3.7 to support connections along the Grand Union Canal. 	<ul style="list-style-type: none"> • Stronger emphasis on the potential of the key development sites to improve place-making and connectivity in the area added to supporting text. • Rejected suggestion to include more sites as the development potential of these sites is already recognised by a separate boundary within the building heights policy. Paddington Police Station is part of a cluster of key development sites at the Edgware Road, Marylebone Flyover junction. This area is distinct in character from the POA and in placeshaping terms it is valid to differentiate between these two areas. The Paddington New Yard is a distinct site outside of the opportunity area and the character of these two areas should be kept distinct. • Under recognition of POA's high potential and heights appropriate for this area addressed by changes to the building heights policy. • Additional narrative inserted on the need to respond to such changes to enable the operations of the transport hub and to respond to changes and growth opportunities. • Added further emphasis on the development opportunity at St Mary's Hospital site, its potential for

		<p>placeshaping and to act as a catalyst for change in the area. The site has been re-modelled and its capacity reviewed.</p> <ul style="list-style-type: none"> Added reference to improving cycling environment in policy wording and in the supporting text.
<p>Policy 4 Spatial Development priorities: Victoria Opportunity Area (VOA)</p>	<ul style="list-style-type: none"> More emphasis on the potential for Victoria Station to act as a catalyst for change in the area and as a key driver for growth. Suggested amendments to the Opportunity Area boundary to: remove the portion east of Palace Street/Buckingham Gate; and incorporate Network Rail's Grosvenor Sidings. Suggestion that the proposed Opportunity Area encroaches into the conservation area and is inappropriate. The plan could reference issues associated with the Inner Ring Road (IRR) and encourage initiatives to address them. Request to add reference to our commitment to working with stakeholders within the area. The wording of part E of the policy suggests that enhanced walking and cycling routes between Pimlico and its context to the north is likely to increase travel demand between the Victoria Opportunity Area and the Vauxhall, Nine Elms and Battersea Opportunity Area in Lambeth. 	<ul style="list-style-type: none"> Emphasis on the potential of Victoria Station added. Suggestions to amend the Opportunity Area boundary rejected. Opportunities still exist in the area east of Buckingham Gate. The Grosvenor Sidings site does not conform with the physical parameters of the area and has therefore not been included in the interest of a focused approach to place-making. The revised Opportunity Area designation is considered appropriate and it does not exclude the protection given by the conservation area. The plan recognises the challenges posed by traffic domination, including the IRR. Reference to our commitment to working with stakeholders within the area added. Direct focus on routes between Pimlico and Victoria removed and policy wording updated to reflect the council's ambition to improve enhanced routes and connection between visitor attractions.
<p>Policy 5 Spatial Development priorities: North West Economic Development Area (NWEDA)</p>	<ul style="list-style-type: none"> Policy broadly supported Support for improving walking environment and reducing severance in the area Concern over piecemeal development in Woodfield Road area and request for a more coordinated planning framework in the area Desire to encourage more open space Issue of affordable workspace raised 	<ul style="list-style-type: none"> Supporting text updated following comments Mapping updated

	<ul style="list-style-type: none"> Some concerns regarding mapping 	
Policy 6 Spatial Development priorities: Church Street / Edgware Road and Ebury Bridge Estate Housing Renewal Areas	<ul style="list-style-type: none"> Policy broadly supported Concerns regarding traffic generation Some confusion on the nature of 'connections' at Ebury relating to the Pimlico Grid Some concerns regarding wording on taller buildings in Ebury Bridge Estate 	<ul style="list-style-type: none"> Revision of wording on Ebury Bridge Estate to provide more substantive objectives – tall buildings issue dealt with in building height policy Wording on connections to local area improved to reflect this is to do with the pedestrian environment/public realm Supporting text on Tollgate Gardens removed as redevelopment almost complete
Policy 7 Neighbourly Development	<ul style="list-style-type: none"> It may not always be possible to enhance amenity. A balanced approach must be taken to recognise how proposals can contribute to the city plan's objectives. 	<ul style="list-style-type: none"> Policy wording amended to require enhancement where appropriate. Supporting text amended to recognise that a balanced approach will be taken when assessing proposals. Note, policy renamed: Managing development for Westminster's People
Chapter 2 Housing Policies		
Policy 8 Stepping up housing delivery	<ul style="list-style-type: none"> Policy broadly supported Restriction of short term lets supported Mixed support for maximum size threshold for new homes Support for optimising density Uncertainty at how target would be met given drop off in planning applications with Planning Performance Agreements (PPAs) Concern that policy would not retain the restriction on the conversion of single dwelling houses to more than one unit Concern that residential use was identified as the priority across Westminster Suggestion for additional exemption to allow for the loss of residential accommodation on one site provided it is re-provided on an alternative site within the borough 	<ul style="list-style-type: none"> Housing target adjusted to take account of key sites and deliverability evidence Maximum size threshold increased to 200sq m in light of comments Additional wording on how housing target will be achieved Policy wording adjusted to reflect housing is not always the priority use, especially within the CAZ Wording on conversion of homes and protection of existing residential floorspace amended for clarity Additional exemption not agreed as it will likely result in loss of residential in CAZ, undermining the objective of delivering balanced communities.

Policy 9 Affordable housing	<ul style="list-style-type: none"> • General support for 35% strategic target • Concern over thresholds for contributions from commercial uses and whether net or gross floorspace applied • Mixed support for revised tenure split • Suggestion to include key-worker housing in supporting text • Some confusion regarding provision of on-site, off-site and payments in lieu for affordable housing 	<ul style="list-style-type: none"> • New standalone policy on affordable contributions from commercial uses, with revised wording in light of comments and viability evidence • Clarified circumstances where off-site delivery or payment in lieu would be considered • Moved sections on housing for older people into policy on meeting the needs of specific groups
Policy 10 Meeting housing needs	<ul style="list-style-type: none"> • Mixed support for 25% family sized requirement • Concerns that all 2-bedroom units would be double bedrooms only 	<ul style="list-style-type: none"> • Incorporated student housing policy and sections on older persons housing • Wording on size thresholds clarified to show 25% family homes is an overall target, whilst studio and double bedroom requirement applies to individual proposals • Revised wording on 2-bed requirement, so the majority of units within a development are provided as solely double bedrooms
Policy 11 Innovative housing delivery	<ul style="list-style-type: none"> • Innovative housing delivery policy broadly supported • Suggestions that homes delivered using innovative methods should not need to meet every policy test as detailed in other policies of the Plan • Suggestions that more details are needed in relation to some products such as build-to-rent schemes. 	<ul style="list-style-type: none"> • All homes delivered in Westminster need to meet every policy test as detailed in the City Plan to make sure the plan's objectives are delivered. • Additional narrative inserted on the housing types and models the policy supports. • Policy recognises that Westminster's tenure split would not always apply under certain circumstances
Policy 12 Student accommodation	<ul style="list-style-type: none"> • Suggestions that policy should allow for loss of student accommodation floorspace under certain circumstances • Concern that the affordability requirement is too restrictive and suggestions that the policy should intend to guarantee the maximum possible level of affordable accommodation rather than 100% 	<ul style="list-style-type: none"> • Elements of the policy have been moved to other policies, so it is no longer a standalone policy • Policy allows for the loss of student accommodation floorspace under certain circumstances • The affordable accommodation requirements have been lowered to make sure it is still viable to deliver student accommodation in Westminster and in line with London Plan requirements

<p>Policy 13 Housing quality</p>	<ul style="list-style-type: none"> • Suggestions that the upper size limit for new residential units is too restrictive and that the limit should be removed or increased • Suggestions that the upper size limit for new residential units should not apply in Heritage buildings and converted homes • Suggestions that a number of larger units should be permitted in major developments • Suggestions that the upper size limit for new residential units should only apply in certain areas. • Suggestions that the upper size limit should be lower when a unit is being lost • Suggestions that the upper size limit should consider the number of storeys and bedrooms of the unit 	<ul style="list-style-type: none"> • The upper size limit on the size for new residential units has been revised and set at 200 sq m (50 sq m increase from 150 sq m) • Policy wording has been revised so it is clear that policy may be applied flexibly in heritage assets (including listed buildings) and converted homes to protect the assets and/or the setting • Policy applies across the city as housing delivery is a strategic issue
<p>Chapter 3 Economy and Employment Policies</p>		
<p>Policy 14 Supporting economic growth</p>	<ul style="list-style-type: none"> • Concern that the economic importance of Westminster's higher education institutions was not recognised • Some suggestions that policy should not allow for any net loss of office floorspace from the CAZ, and others requesting more scope for conversion to D2 leisure uses, educational institutions, hotels and residential • It should be clarified that protection of SME space only relates to the NWEDA • Further narrative on expected growth sectors, and how levels of growth can be delivered should be provided • Anticipated levels of commercial growth broadly supported • Policies should ensure increased economic activity directly improves the lives of residents 	<ul style="list-style-type: none"> • New policy inserted that acknowledges the vital role of higher educational institutions, and supports their presence and growth • Past levels of office floorspace loss are not sustainable and a stronger level of office floorspace protection is required. Policy nevertheless amended to recognise there may be some limited circumstances where loss of floorspace may be supported • Clarified that requirements for re-provision of SME space relates to the NWEDA only, and the role of co-working space in supporting small businesses • Additional narrative inserted on the diversity of Westminster's economy, and key growth sectors • Reduced job and floorspace figures to align with plan period and provided further narrative on how refurbishment schemes and changing ways of working

		<p>are likely to result in a lower need for additional B1 floorspace than originally anticipated.</p> <ul style="list-style-type: none"> • Education and skills policy expanded to make clear that ensuring residents benefit from the job opportunities provided by economic growth is a priority
Policy 15 Town centres, high streets and the CAZ	<ul style="list-style-type: none"> • The role of higher education institutions within the CAZ should be recognised • Some requests for inclusion of matters that cannot be controlled through the planning process, such as quality of occupier, business rates, levels of policing, licensing arrangements • Some requests for further flexibility of uses across town centres, the level of protection applied to A1 units and areas to which marketing tests apply • Some suggested re-designation of centres within the town centre hierarchy and their boundaries • Suggestions that marketing requirements should be reduced to avoid long term vacancies • Conflicting views on the role of residential development – some suggestions that residential should be identified as a key town centre use, others that it should not be supported as it sterilises future development opportunities • Greater recognition of the need to support new forms of retail should be provided • Limited solutions provided to address the weakening of Queensway/ Westbourne Grove Major Centre • Some concerns that plans for Oxford Street remain too narrowly focussed on public realm improvements 	<ul style="list-style-type: none"> • Separate standalone policy introduced recognising the importance of higher education institutions • Policy seeks to focus on matters that can be controlled through the planning process • Policy seeks to balance the evolution of town centres and need for complementary uses with a need to protect their retail function • All boundaries and designations have been updated in accordance with the recommendations of the town centre health check 2018 • Policy allows for temporary uses as units are marketed • Policy seeks to recognise commercial development is the priority in the town centre hierarchy and that residential can complement this in smaller centres • Increased emphasis on supporting innovation in the sector, and recognition that this may include sui generis uses • Plan seeks to support proposals that improved the vitality and viability of Queensway/ Westbourne Grove Major Centre, without being overly prescriptive of the type of development envisaged, or matters that cannot be controlled through land use planning • Town centre policies seek to support innovation in the retail sector alongside planned investment in the public realm, to secure the long-term health of Oxford Street

Policy 16 Markets and commerce in the public realm	<ul style="list-style-type: none"> • Requests for policy to support the removal of existing telephone boxes and kiosks • Support should be provided for outdoor seating proposals by businesses next to others that have such facilities • Where provided, tables and chairs should be directly outside the premises to which they relate 	<ul style="list-style-type: none"> • Policies seek to focus on matters that need planning permission, however digital policy supports the removal of redundant equipment • Individual proposals will be determined on their merits • Policy seeks to avoid being overly prescriptive
Policy 17 Visitor economy	<ul style="list-style-type: none"> • The approach to hotels was considered to be too restrictive • Suggestions to clarify the approach to ancillary facilities to arts and cultural uses • Request to acknowledge some of Westminster's visitor attractions • Support for the provision of public toilets as part of developments 	<ul style="list-style-type: none"> • Providing a more balanced and flexible approach to hotel provision, in terms of location, previous land use and regarding upgrades • Amended the approach to ancillary uses in line with consultation comments • Support text has been expanded to provide additional context on Westminster's visitor economy
Policy 18 Food, drink and entertainment uses	<ul style="list-style-type: none"> • Request to protect venues for specific groups (e.g. LGBTQI+) • Concerns around amenity issues of late-night activities were raised • Concerns around the over-concentration of specific uses have been expressed • Request to protect upper floors in pubs specifically • More emphasis on the need to diversify the night-time economy is requested 	<ul style="list-style-type: none"> • The value that venues bring for specific groups has been recognised in the supporting text • More emphasis has been placed on amenity issues in the supporting text • The approach to over-concentration of uses has been clarified in the support text • Not the land use, but the pub as a function is protected which means that upper rooms are normally protected as well when they are part of the function of the pub. Upper floors therefore don't need to be separately protected • The support text has been expanded to highlight the need to diversify the night-time economy. The council is working on a vision for the evening and night-time economy.
Policy 19 Soho Special Policy Area	<ul style="list-style-type: none"> • General support for introduction of SPA • Concern on application of policy to Oxford Street • Concerns on when amalgamation of buildings clause would apply 	<ul style="list-style-type: none"> • Boundary altered to exclude Oxford Street international shopping centre • Wording on amalgamation of buildings and hotel restrictions altered in light of evidence

	<ul style="list-style-type: none"> Concerns over limitation on hotel sizes Concerns that LGBTQI+ character of Soho not adequately represented or protected 	<ul style="list-style-type: none"> Policy more positively drafted to reflect LGBTQI+ community, protect character and encourage more venues
Policy 20 Mayfair and St. James's Special Policy Area	<ul style="list-style-type: none"> Retention of SPA supported, but some concerns that combining of 2 distinct SPAs could result in a migration of gallery floorspace from one SPA to the other Importance of antique trading to character of the area should be recognised Policy should not confuse protection of land uses with wider heritage and townscape protection Policy does not acknowledge ideas in Mayfair Neighbourhood Plan 	<ul style="list-style-type: none"> Support welcomed Amended to clarify that policy covers two separate SPAs, to ensure policy does not support the loss of gallery space within one SPA where it is re-provided in the other Greater recognition of the contribution of antique trading to the character of the area inserted If 'made', Mayfair Neighbourhood Plan will form part of the Development Plan and be used alongside City Plan policies
Policy 21 Harley Street Special Policy Area	<ul style="list-style-type: none"> Retention of a SPA supported but recognition of the need for the area to remain at the forefront of modern medicine should be provided 	<ul style="list-style-type: none"> Support welcomed - recognition of the need to support modern facilities to maintain appeal provided within supporting text
Policy 22 Portland Place Special Policy Area	<ul style="list-style-type: none"> Feedback that policy was outdated and unnecessarily restricted development options in this area given recent losses of institutional uses – greater scope should be given for a range of commercial and community uses 	<ul style="list-style-type: none"> Policy removed – recognising the CAZ designation and other policies in the City Plan provide adequate policy coverage to guide development.
Policy 23 Savile Row Special Policy Area	<ul style="list-style-type: none"> Retention of a SPA supported, but concerns that policy had been diluted in a manner that could result in the loss of tailoring floorspace to retail 	<ul style="list-style-type: none"> Support welcomed - strengthened protection of existing tailoring floorspace to address concerns.
Chapter 4 Connections		
Policy 24 Enhancing mobility	<ul style="list-style-type: none"> Active travel should be drawn out earlier but focus on Active travel is welcomed The City Plan is not ambitious enough in terms of safe cycle routes The City Plan is not ambitious enough in terms of parking 	<ul style="list-style-type: none"> Active travel is further developed in a new individual Policy on Walking and Cycling which includes more detail on cycle routes and the strategy for developing this active travel strand; this includes details on the measures such as cycle permeability schemes. The parking policy has been significantly altered (see comments below on parking).

	<ul style="list-style-type: none"> • The City Plan should go much further in specifying how it will improve access for people with mobility issues • Add a reference to alleviating the problems of on-street coach and tour bus parking 	<ul style="list-style-type: none"> • The City Plan addresses the mobility issue by linking public realm improvements much closer to transport accessibility issues. • Greater synergy between coach and tour bus parking and the quality of the public realm improvement underlined.
Policy 25 Highway access and management	<ul style="list-style-type: none"> • The blanket approach of resisting the loss of highway land does not take account of the individual circumstances where a better design solution can sometimes be produced • Policy should specify that provision for taxis, coaches and other tourist vehicles should not be located directly outside major tourist attractions and transport hubs and must not be provided at the expense of space for active travel and local public transport. 	<ul style="list-style-type: none"> • Rejected: loss of highway land and the public realm for pedestrians and vehicles impedes movement and traffic flow, worsening congestion and discouraging active transport modes such as walking and cycling which is a council priority. • Policy states that proportionate provision is made. This policy is not read in isolation but in conjunction with public realm policies.
Policy 26 Freight, servicing and deliveries	<ul style="list-style-type: none"> • Policy 26 should include reference to waterborne freight. • Any increase in freight journeys being undertaken at night - a possibility if daytime deliveries are reduced - should be considered • Policy should be amended to reflect the increasing trend of using street space flexibly to serve a range of development functions 	<ul style="list-style-type: none"> • Waterborne freight referred to in Waterways and Waterbodies policy • Freight journeys at night reflected in the promotion of efficient freight delivery methods in policy. • The policy recognises that street space can be used flexibly but also protects against adverse effects on other highway and the public realm.
Policy 27 Technological innovation in transport	<ul style="list-style-type: none"> • The introduction of on-street battery recharging facilities for electric vehicles for visitors will undo years of public realm improvement works to declutter our environments • On-street charging points could be also used by commercial operators at any time of day or night • Policy should acknowledge that there are some off-street car parks that could enable freight and micro-consolidation facilities 	<ul style="list-style-type: none"> • The new policies in the Connections chapter put greater emphasis on the role that an improved public realm plays on meeting the Plan's strategic objectives including delivering sustainable transport measures. The plan stresses the need to declutter the public realm in order to facilitate better movement. • The better use of space and the potential for off-street areas that enable freight and micro-consolidation facilities are promoted in the City Plan. In terms of off-

	<ul style="list-style-type: none"> To provide for electric vehicles in future, the Council should convert existing on street parking bays. Charging points should be located on the main carriageway and not the footway, in line with the Healthy Streets Approach. 	<p>street car parks, the Parking policy supports the redevelopment of existing car parks for alternative uses.</p> <ul style="list-style-type: none"> The Sustainable Transport policy in the Connections section references and advocates the principles in the Mayor's Healthy Streets Approach
Policy 28 Parking	<ul style="list-style-type: none"> Parking standards do not align with the London Plan and contradict the "green" ambitions of the City Plan Resident parking permits scheme should be reviewed to reduce the number of cars in Westminster. Existing on-street parking should be able to be removed where it will facilitate other sustainable transport measures. Major schemes are expected to provide some parking provision unless appropriate mitigation measures are provided such as the delivery of sustainable transport infrastructure. Some consultees have argued that given the dense network of public transport in Westminster it shouldn't automatically be assumed this is necessary in every case. 	<ul style="list-style-type: none"> The policy has identified areas of the city where car-free developments will be more appropriate but has taken an evidence-based approach which suggests that due to kerbside stress, on-site car parking is appropriate in some areas in Westminster. The issuing of parking permits materially effects parking provision, but it is out of scope for the City Plan to control this.
Policy 29 Waterways and waterbodies	<ul style="list-style-type: none"> It is considered that more could be made of the opportunities the River Thames offers with regards to trade, travel, leisure and pleasure. The policy should maintain its requirement for a robust strategic case and recognition of the particular value of the city's waterways but remove the presumption against the principle of a river crossing 	<ul style="list-style-type: none"> The policy recognises the opportunities that the River Thames offers in terms of a variety of uses. The principle of a river crossing is not supported in the policy.
Policy 30 Community infrastructure,	<ul style="list-style-type: none"> Policy should specify that any school expansion should not be on a school playing field 	<ul style="list-style-type: none"> Rejected. All open space is protected but, if there is a high demand for school places that cannot be met elsewhere, a balanced view will be taken. The

education and skills	<ul style="list-style-type: none"> Concerns that co-location may undermine the primary function of some facilities if floorspace reconfigured Some objections to marketing period 	<p>expansion of a school onto its playing field, when coupled with investment in upgrading the school's sports facilities, may be reasonable and it would be unwise to preclude this approach being considered. Clear criterion that co-location or reconfiguration of floorspace should not undermine the function of the facility.</p> <ul style="list-style-type: none"> Consider marketing period to be adequate for the type of use and nature of potential occupiers Criteria on education and skills moved to new standalone policy
Policy 31 Digital infrastructure and information and communications technology	<ul style="list-style-type: none"> Concern that policy is not positively drafted enough, setting out clearly the public benefits of digital infrastructure, and does not reference UK Digital Strategy 	<ul style="list-style-type: none"> Policy wording redrafted more positively, with references to public benefit and to UK Digital Strategy
Chapter 5 Environment Policies		
Policy 32 Managing air quality	<ul style="list-style-type: none"> Air Quality Neutral should be a minimum requirement Approach to Air Quality Assessments is unclear Concerns around accepting contributions to offset air quality impacts have been expressed 	<ul style="list-style-type: none"> Air Quality Neutral requirement amended to be in line with the London Plan Additional clarification on the requirements for Air Quality Assessments has been added The approach to contributions to offset air quality impacts has been clarified and moved to the support text and brought in line with the London Plan
Policy 33 Managing flood risk	<ul style="list-style-type: none"> Request to reference the roles the canal plays in addressing flood risk issues Request to set higher requirements for Sustainable Drainage Systems (SuDS) 	<ul style="list-style-type: none"> The role of canals in managing flood risk has been added to the support text The approach to SuDS has been clarified and is in line with the SFRA
Policy 34 Managing local environment effects	<ul style="list-style-type: none"> Concerns around the approach to noise as being inconsistent with Agent of Change principle and missing reference to vibration Waste management requirements are unclear 	<ul style="list-style-type: none"> Redefined the approach to noise to address consultation comments, including reference to vibration Waste management requirements have been clarified, and are now located in a separate policy

	<ul style="list-style-type: none"> Concerns around strategic waste management requirements were raised, particularly around meeting the London Plan waste apportionment 	<ul style="list-style-type: none"> Waste evidence has been published alongside the City Plan and strategic waste planning issues are further detailed in the duty to co-operate statement
Policy 35 Green infrastructure	<ul style="list-style-type: none"> Further clarification to our approach to different types of green infrastructure is needed 	<ul style="list-style-type: none"> Redrafted the policy to clarify the approach to different elements within the green infrastructure network
Policy 36 Energy	<ul style="list-style-type: none"> Policy to recognise the role green infrastructure plays in managing overheating Request to set out specific BREEAM standards 	<ul style="list-style-type: none"> The support text recognises the role green infrastructure plays in managing overheating BREEAM standards have been included and are set out in the Design principles policy
Chapter 6 Design Policies		
Policy 37 Design principles	<ul style="list-style-type: none"> Request for reference to active lifestyles/ principles of active design. Policy should apply sustainability standards to encourage and reward positive development. Policy should expand on the challenges and opportunities around retrofitting Westminster's building stock as the majority of this is likely to remain unchanged during the lifetime of the new City Plan. Suggest additional information on secure by design should be included within the policy. Policy should include reference to/ criteria on heritage. Some support for and some objection to reference to contemporary design specifically, term contemporary design not clear. Disagree with the reference to Westminster's coherent scale. Clarity is sought as to what is anticipated by way of the requirement for 'collaborative and participatory design approaches'. Suggestion that we should have design review. 	<ul style="list-style-type: none"> Reference to active lifestyles included within supporting text and design for active lifestyles included within policy. Additional reference to heritage included in first part of policy. Added policy clause on BREEAM standards, to set out how we will measure sustainable design. General text on retrofitting and retention of existing buildings added to supporting text. Secure by design now within security measures policy. Collaborative and participatory design approaches and how these can best be encouraged and implemented, including the need for design review, are being considered as part of an ongoing review of the planning service's work.
Policy 38 Westminster's heritage	<ul style="list-style-type: none"> Issues raised in relation to use of language and conformity with statutory tests and NPPF. 	<ul style="list-style-type: none"> Wording amended to make policy more positive: new strategic aim to celebrate and enjoy what heritage brings to Westminster and recognise wider role of

	<ul style="list-style-type: none"> • Policy is too high level and vague, insufficiently locally distinctive and does not set out a positive strategy, as required by the NPPF. The extent of heritage assets warrants a standalone policy on each type of asset. • Policy does not engage with issues of harm and benefit, suggestion policy criteria used for non-designated heritage assets could also be applied to listed buildings and conservation areas. Other consultees suggesting all harm to heritage assets should be avoided. • Principle should be included to encourage reuse and refurbishment of existing buildings rather than wholesale demolition and new-build proposals. Concern over interpretation of criterion on upgrading environmental performance and accessibility. • Request for further guidance/ criteria on alterations to listed buildings, which form the vast majority of applications for listed building consent. • Request for reference to heritage and good growth • Objection to wording on clauses on demolition, some suggesting exceptional circumstances should apply to unlisted buildings of merit, request for more on façade retention and concern that demolition of listed buildings should never be permitted. • Request for more detail in relation to World Heritage Site: Outstanding Universal Value (OUV) should be clearly identified as the critical guiding principle in ensuring applications address issues of immediate setting and the potential adverse 	<p>heritage including in Westminster's economy and growth, reference to heritage as part of 'good growth' included and references to harm/benefits in supporting text and policy, while not duplicating the NPPF.</p> <ul style="list-style-type: none"> • Changes to language to reflect statutory tests and NPPF guidance. • Additional criteria added on alterations to listed buildings. • Strengthened policy and additional criteria on World Heritage Site, strengthened supporting text, including reference to Restoration and Renewal. • Further detail and Westminster specific references added in supporting texts to make policy more locally distinctive. • Enhanced supporting text for all sections to provide more comprehensive guidance.
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	impacts upon the WWHS as a result of localised developments as well as related issues.	
Policy 39 Townscape and architecture	<ul style="list-style-type: none"> • Objection to removal of references to local views within policy. Detailed wording issues also raised in relation to views. Particular importance of royal parks views noted. • Specific objections to terms used e.g. <i>subordinate</i>, <i>façade</i>'. • Concern over clarity of definition of extensive development and reference to creation of 'points of interest'. • Insert provision to encourage active frontages • Request for reference to supporting alterations and extensions where they provide the opportunity for further residential or employment floorspace • Roof extensions policy should not just apply to mansards. • Roof extensions policy (commercial extensions) should apply across the CAZ and not just to certain areas within the CAZ. • Section C: extend policy to positively consider roof extensions for not only the extension to existing households but also for the creation of a new residential units. • Some suggestion the tests around heritage, amenity and uniformity are too onerous and roof extensions policy should be applied flexibly so that where more storeys do not cause any harm, they should be allowed. • Other concerns expressed that proposals to allow double mansards in commercial areas could cause harm to heritage assets and need to continue to have sensitive approach within conservation areas etc. 	<ul style="list-style-type: none"> • Addition of local views, with positive wording to reflect not just about protection but development which contributes positively to such views. Specific reference to views from open spaces within heritage policy but also reference to importance of views to and from open spaces within supporting text. • Detailed wording reviewed and amended in response to comments, references to enhancement and contribution of heritage assets added. More locally distinctive references included within policy and supporting text. • Addition of roofs to this policy to sit with alterations and extensions, recognising that all types of extensions can contribute to growth and roof extensions are a subset of extensions. • Roofs policy amended with removal of reference to mansards and removal of one and two storey specific limit to nos. of storeys. Criteria provided to indicate where roofs will be acceptable including not only the extension to existing households but also for the creation of a new residential units. Criteria also targets the most significant extensions for commercial floorspace to growth areas and areas where townscape can accommodate these. The supporting text notes that where more storeys do not cause any harm, they should be allowed. Policy and text continue to recognise one storey likely to be most appropriate in residential areas. • Reference to protection of heritage assets maintained to ensure compliance with statutory duties.

<p>Policy 40 Density and building height</p>	<ul style="list-style-type: none"> Concerns around the application of the mansard extensions aspect of the policy have been raised Concerns around the impact that increasing density has on design quality were raised The approach to building height is unclear as there are several exemptions to the maximum heights in the policy and supporting text Concerns around the setting of maximum heights and the evidence behind these limits have been expressed 	<ul style="list-style-type: none"> Approach to upwards extensions has been revised and included in the Townscape and architecture policy High quality design is instrumental to achieving high density developments, which is assured by the inclusion of strong design policies in this plan A building height study was commissioned to inform the policy approach to building height. The approach to building height has been revised to be more positive and robust and places more emphasis on the fact that the acceptable height of a building is dependent on its context
<p>Policy 41 Public realm</p>	<ul style="list-style-type: none"> General support for policy objectives. Where appropriate the public realm should include wider pavements and benches for seating, which encourage visitors to rest, dwell and spend time in the area. Careful consideration needed as not to encourage ASB. Need to refer to cycling as a mobility aid, as well as "pedestrian convenience" (41B.1) Would like greater support to the city's existing high street businesses through enhancements in the physical appearance of the public realm and the management of it. Freight and servicing requirements must be fully taken into consideration, especially in relation to major public realm proposals. Need to counter encroachment by structures like unused phone booths and other ways to bypass council control, which impact on the public realm. The positive role contribution of high quality signage and advertising in enhancing experience of the public realm should be supported and clearly reflected in policy text. 	<ul style="list-style-type: none"> Agreed. Policy along with Connections section reflects the objective to make the public realm more attractive for visitors, including the provision of additional seating and where appropriate pavement widening Public realm linkages to encourage cycling and pedestrian convenience acknowledged in policy. These issues are also addressed in Connections chapter where synergy between sustainable transport modes and the quality of the public realm is detailed. Policy reflects the importance of the physical appearance of the public realm, people's experience of it and its connection to town centres and the associated uses. Freight and servicing requirements reflected in Freight policy within Connections chapter. Policy now includes a section on commerce and the public realm Policy states that advertising should positively enhance the appearance of the public realm On-street EV charging facilities, a fundamental objective of the Connections policies and Public realm section is

	<ul style="list-style-type: none"> On-street EV charging facilities for visitors could undo years of public realm declutter/improvement works and may have an adverse effect on pedestrian footfall. 	to declutter the public realm in order to create a more pedestrian friendly environment
Policy 42 Basement development	<ul style="list-style-type: none"> Clarification on the application of the limits in the policy was requested. 	<ul style="list-style-type: none"> The policy has been expanded to set out clearly the expectations, depths and limits of basement development, addressing issues raised.
Policy 43 Security measures in high-risk development and the public realm	<ul style="list-style-type: none"> More clarity should be provided on what advice should be sought from which advisors. More detail on secured by design. Area wide approach to security should be included rather than standards for individual proposals. A lighting and CCTV strategy should be created for the public realm. Hostile Vehicle Strategy should be created. 	<ul style="list-style-type: none"> More detail and clarity added to the policy wording and supporting text. A lighting strategy is being developed by the council. Other strategies fall outside of the remit of the City Plan and do not necessarily need a policy hook to progress. The principles for security measures are strategic and form the basis for area-wide security interventions which are better set out within place plans.

2.2 Regulation 18 consultation (2017)

Formal notification of Full City Plan Revision under Regulation 18 was carried out for a period of just over six weeks between 16 June and 28 July 2017.

2.2.1 Notification

Emails and specifics letters

Notification was made by email to the 671 consultees that were on the council's planning policy database⁹ including the statutory consultees listed in paragraph 2.1.1.

A copy of the consultation letter and Notices is attached as Appendix 9. Consultees were advised that the council was intending to undertake a full review of all policies in Westminster's City Plan (November 2016) and the "saved" UDP policies.

Website

The council's website advertised this stage of consultation on the page relating to the Revision to Westminster's City Plan (a screenshot of the website is attached as Appendix 10). This also included a link to the consultation letter and Notice.

Meetings and events

The council fulfilled its duty to co-operate as part of the Regulation 18 consultation and the Full Revision was discussed in a number of meetings with neighbouring boroughs and other key stakeholders attended by Westminster City Council's officers. Further details on the duty to co-operate can be found in the duty to co-operate Statement.

Hard copies

During the consultation process, a hard copy of the draft City Plan and of the Policies Map was available to be consulted in every Westminster library.

Copies of the documents were also available at Westminster's City Hall reception.

2.2.2 Respondee

Submission of responses

The council welcomed representations made via email to planningpolicy@westminster.gov.uk and letters sent to

⁹ The information on the planning policy database is updated on a continual basis, with contacts being added, removed or amended on request. A small number had not provided an email address and were contacted by letter.

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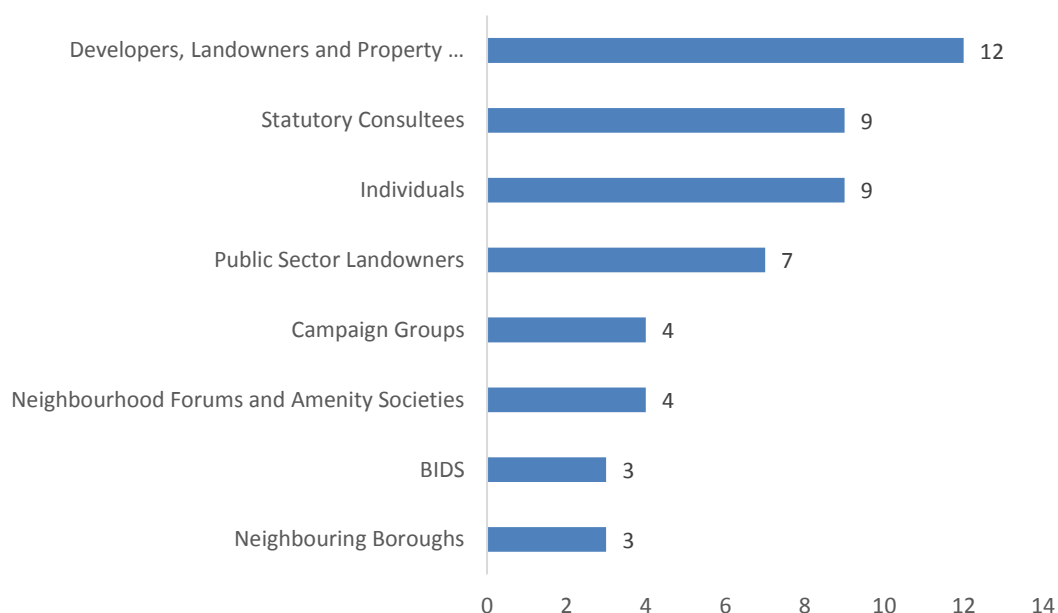
Responsees and responses received

The council received 51 formal responses, almost all of them by email. 196 key comments and concerns were identified from these responses.

A list of responsees is attached as Appendix 11.

Figure 1 shows the different types of consultee responsees.

Figure 4 - Responses per consultee type (Regulation 18 consultation)



2.2.3 Summary of key issues and how these have been taken into account

Specific comments to proposals in the Regulation 18 statement

Figure 5 - Specific comments (Regulation 18 consultation)

Key issues raised	Council's response
1. A renewed vision and strategic objectives	
<p>Comment/Concern</p> <ul style="list-style-type: none"> The long-standing consistency of approach and objectives has produced a level of predictability which has helped to reduce the risks and costs of preparing planning applications and high-quality schemes come forward. Moving away from this established approach to impose new more restrictive policies in the manner of London Authorities would be a retrograde step¹⁰. 	<p>Comment noted. The Council is not intending to move away from having a reliable set of policies, however it is necessary that they are updated as we are currently depending on UDP Policies for development management purposes which are over ten years old, were developed under a previous national planning framework and require updating to still be relevant and unchallengeable. It is also necessary to review the plan and insert new development management policies to align with recently revised national planning policy.</p>
<p>Comment/Concern</p> <ul style="list-style-type: none"> The Strategic Objectives should be updated to include references to addressing pollution and congestion¹¹, and to promoting clean air and green space¹². In particular, clean air and green space do not seem to be captured in the existing objectives and yet providing them is vital to ensuring a world-class city¹³. The provision of more 'green infrastructure' should also be encouraged and more references to health and wellbeing and green infrastructure could be made in policies relating to development¹⁴. 	<p>Air quality, environment and health and wellbeing will be captured in the revised objectives of the City Plan and supported by the planning policies of the revised City Plan. Improving air quality is a particular priority for the council and will therefore have more prominence in the revised City Plan.</p>

¹⁰ McKay Securities

¹¹ Belgravia Society

¹² Victoria BID

¹³ Victoria BID

¹⁴ Victoria BID, Shaftesbury

<p>Comment</p> <ul style="list-style-type: none"> • Strategic objectives must also include a balance between competing factors and should consider resident communities as one of the most important ones¹⁵. Overall strategic objectives should also be the reduction of noise and disturbance in Westminster and the protection of gardens and open spaces from commercialisation¹⁶. • The reasons behind doing a revision should be made clear, as should details on how old policies have not proven themselves appropriate and on what problems have arisen from them¹⁷. • It is not considered that all parts of the City Plan require detailed or fundamental revision, especially those parts that have been recently consulted upon and which were adopted last year¹⁸. The Council should focus primarily on those aspects that are most in need of review – incremental change and continuity of strategic aims and objectives are important for the future delivery of development¹⁹. Landowners argue that the Spatial Vision does not require fundamental revision, while it might be appropriate to amend the Strategic Objectives to prioritise more clearly the delivery of affordable homes²⁰. 	<p>Comments are noted. The objectives of the revised City Plan will strike a balance between different needs and interests and will contain specific policies to protect residential amenity and protect open spaces.</p> <p>The council is revising the City Plan as its planning policies need updating and in line with revised London and national planning policy.</p> <p>As the revised City Plan will replace saved policies from the UDP it will be necessary to review both detailed and strategic policies and sections of the City Plan to make sure the whole plan is consistent and aligned with new legislation and guidance which has come in to force since the policies were originally adopted.</p>
<p>Support</p> <ul style="list-style-type: none"> • There is general support for a comprehensive review of the City Plan²¹ and simplification and flexibility in planning policies are welcome²². 	<p>Support is noted.</p>

¹⁵ Belgravia Society

¹⁶ Belgravia Society

¹⁷ Belgravia Society

¹⁸ Church Commissioners for England, Westminster Property Association (WPA)

¹⁹ Shaftesbury

²⁰ Westminster Property Association (WPA)

²¹ Church Commissioners for England, Historic England, Shaftesbury, Universities Superannuation Scheme, Westminster Property Association

²² McKay Securities

2. Increasing overall housing targets and the delivery of affordable housing

Comment/Concern

- One consultee raised a concern about the impact of a 30% strategic target for affordable housing on viability²³.
- Densification in general was raised as a concern in relation to the impact this will have on social and community (particularly sports) facilities²⁴.
- Concerns were raised about the introduction of post-permission viability reviews with one consultee suggesting the approach in the Mayor's SPG should be adopted²⁵.
- Developers commented that post-permission reviews which take place prior to completion will create uncertainty, affect viability and deliverability of schemes- they advise that reviews should only take place prior to implementation²⁶, and should not be used to increase affordable housing contributions above the policy compliant level regardless of the amount of profit the scheme generates²⁷.
- Some consultees are concerned about the balance between residential and commercial uses in the CAZ, particularly because of the conflicts that can occur between such uses²⁸.
- A number of non-planning housing policy issues or issues outside the remit of the City Plan review were raised such as where the affordable housing fund is spent, the rent levels charged for social housing units and policies for providing housing for different generations of the same family²⁹. One consultee suggested a planning brief for Elmfield Road be updated³⁰.

The strategic affordable housing target for Westminster is already 30%. Schemes are tested for viability and the whole plan was tested for viability and found to be viable.

The Community Infrastructure Levy is designed to address the increasing demands for infrastructure arising from new development, which is supported by the Infrastructure Delivery Plan that will accompany the City Plan. Density policies are linked to other policies regarding residential amenity and design to ensure the design takes appropriate account of the quality of life of residents. In addition, the City Plan contains policies to protect open spaces and community facilities.

The Mayor strongly advocates the use of post-permission viability reviews and has published an SPG on viability which includes detailed guidance on how they should be calculated. Westminster will follow the Mayor's lead of post permission viability reviews. It is not intended that they will be used to increase affordable housing contributions over the policy compliant level, but to ensure that if a scheme which did not meet policy compliance at permission stage contributes more post-implementation should viability of the scheme improve. This will be set out in an SPD to accompany the City Plan.

The City Plan will balance commercial and residential uses in the CAZ, for instance through policy seeking to achieve a mix of uses

²³ Defence Infrastructure Organisations

²⁴ Sport England

²⁵ Land Securities, Church Commissioners for England, Westminster Property Association, Defence Infrastructure Organisations

²⁶ Land Securities, Church Commissioners for England, Westminster Property Association

²⁷ Westminster Property Association

²⁸ Heart of London

²⁹ Belgravia Society

³⁰ NHS Property Services

	<p>through delivery of affordable housing in the CAZ and requiring new developments to be neighbourly.</p> <p>With regard to the non-planning issues raised – the Council does not regularly publish where the affordable housing fund has been spent and there is currently no requirement for the Council to do so.</p> <p>Rents charged for social housing are not set by planning policy, so the City Plan cannot address this point.</p> <p>The allocation of social homes is set out in housing policy based on need, not through planning policy. Grown up sons and daughters of social housing tenants living in overcrowded social housing get high priority for intermediate housing.</p>
<p>Comment</p> <ul style="list-style-type: none"> • Policy relating to the minimum proportion of family sized units (3+ bedrooms) should be included within the review. • Consultees want the council to review whether requiring 33% of new homes as family sized housing is appropriate as some consider that this does not best address housing need³¹, and the opportunity to allow the loss of individual residential units where they compromise redevelopment of a site e.g. caretaker's flats or overnight accommodation for staff³². • A review of the objectively assessed housing need for Westminster would be welcome³³. • One consultee suggested that as part of affordable housing policy, rentals should be increased towards market rates if the family financial circumstances improve³⁴. 	<p>There is already a policy in the City Plan requiring a minimum number of family sized homes within a development. The policy requirement in the draft City Plan is for 25% of all new homes to be family sized.</p> <p>It would not be appropriate to allow the loss of single residential units such as overnight accommodation for staff within the policy wording as the policy would then be open to abuse and we could lose single homes that are providing much needed housing. There is a strong drive to retain and grow our housing stock.</p> <p>A new housing needs analysis has been completed to support the policies in the new City Plan. Westminster's housing target for the first period of the plan is calculated using the government's standard methodology.</p>

³¹ Land Securities, Westminster Property Association, Shaftesbury

³² Westminster Property Association

³³ Defence Infrastructure Organisations

³⁴ Belgravia Society

- One consultee suggested that removing the requirement for on-site affordable housing could make private housing more affordable³⁵.
- Neighbouring boroughs noted that a review of the policy on gypsy and traveller needs is absent from the Regulation 18 notice and recommended we address our evidence base for the need of this housing type³⁶.
- There was a suggestion that the focus should be for housing delivery outside of CAZ, particularly affordable housing for viability reasons³⁷.
- One consultee has recommended that an 'agent of change' principle is included to ensure the protection of existing uses from challenge by new residents³⁸.
- A couple of proposals sites in the existing City Plan were mentioned in the consultation responses – site E10 was raised as a site which still has potential for a residential- led development, but the landowners would like to see more flexibility in other uses allocated for the site³⁹. Land adjacent to Royal Oak and Edgware Road station was identified for housing densification⁴⁰.
- Consultees have suggested that a recognition of the importance that residents play in contributing to the economic success of Westminster, London and the UK is added⁴¹.

The rents charged for social housing units are not set through the City Plan.

NPPF and London Plan require affordable housing to be provided on site and we would not be in general conformity with the London Plan if we changed our approach to this. Westminster wants to develop mixed communities, and this means delivering a mix of tenures on the same site.

There has been no new evidence arising of a need for gypsy and traveller accommodation in Westminster and in any case, there are no sites available for pitches.

The council wish to see housing delivery across the whole city to harness the potential of every site possible to help meet housing need – therefore it is not appropriate to only focus housing delivery outside the CAZ (which covers 78% of the city).

The Agent of Change principle has been incorporated into the City Plan.

The council has reviewed the requirements for its proposals sites (now called key development sites) in the review of the City Plan and will develop a Site Allocations DPD relating to them.

The City Plan will recognise the important role residents play in contributing to the economic success of Westminster and include

³⁵ Belgravia Society

³⁶ Royal Borough of Kensington and Chelsea

³⁷ Shaftesbury

³⁸ Heart of London

³⁹ NHS Property Services

⁴⁰ TfL Commercial Development Planning Team

⁴¹ The Westminster BIDs

	policies that seek to ensure residents are able to benefit from the opportunities economic growth brings.
<p>Support with qualification</p> <ul style="list-style-type: none"> Developers requested that post-permission viability reviews only apply to large multi-phased schemes⁴². 	The council's approach to post-permission viability reviews will be set out in a SPD to accompany the revised City Plan. The guidance we set will largely be in line with guidance published by the Mayor, which will be based on a size threshold.
<p>Support</p> <ul style="list-style-type: none"> There was a large amount of cross-sector support for the proposal to review the City Plan housing policies to increase housing and affordable housing delivery across the city⁴³, particularly to meet the demand for intermediate housing for those on middle to lower incomes⁴⁴. There were no objections to the proposal to flip the proportion of social and intermediate housing which is required from 60% social and 40% intermediate – on the contrary there was strong support from some consultees⁴⁵. There was also support for densification around commuter hubs⁴⁶ and encouragement for build to rent⁴⁷ in line with recent proposals from Government. 	Support noted, the council will continue to work with partners on this issue.
3. A focus on joint work across the public sector to make the most efficient use of land assets ('One Public Estate')	
<p>Comment</p> <ul style="list-style-type: none"> An audit should be carried out of available development land and buildings within Westminster (not only to cover the public sector, but all assets), prior to developing policies⁴⁸. A number of sites within the boundary of Westminster have been identified as having the potential to come forward for 	The council supports a joint initiative across the public sector to analyse existing development and regeneration opportunities across the borough to get an up to date picture of the situation, assess opportunities and make priorities to speed up the process and ensure delivery. The council has published a brownfield register in

⁴² Westminster Property Association, Land Securities

⁴³ Defence Infrastructure Organisations, Mayor of London, Church Commissioners for England, Westminster Property Association, Shaftesbury

⁴⁴ Victoria BID, Church Commissioners for England

⁴⁵ Belgravia Society

⁴⁶ Defence Infrastructure Organisations, TfL Commercial Development Planning Team

⁴⁷ TfL Commercial Development Planning Team

⁴⁸ Belgravia Society

development/redevelopment, including land adjacent to Royal Oak station and Edgware Road station ⁴⁹ .	line with national regulations which identifies all sites across the borough with potential to deliver more housing. The register is updated annually.
<p>Support</p> <ul style="list-style-type: none"> There is general support from public landowners towards a joint approach on this matter. More details and further engagement are welcome⁵⁰. 	Support noted.
4. Reconsideration of existing policy designations	
<p>Objection/concern</p> <ul style="list-style-type: none"> The extension of the CAZ to promote the night time economy is not agreed with as it is likely to have detrimental impacts on local residents in terms of nightclub noise, pedestrian nuisance and antisocial behaviour⁵¹. Any re-designating of areas within the Pimlico Forum area to the Victoria BID or Opportunity Area would be resisted⁵². Also, Knightsbridge should remain within the CAZ and Core CAZ⁵³. A number of consultees have expressed concerns in regards to potential change in policy designations⁵⁴. Concerns have been raised over the designation of St. John's Wood as a centre for leisure and recreation, in relation to potential negative impacts on local residents⁵⁵. 	<p>Reconsideration of existing policy designations form part of the current revision of the City Plan to create a long-term spatial vision for Westminster. The revised City Plan contains policies (including the 'agent of change principle') to minimise and, where necessary, mitigate adverse effects of development on its surroundings.</p> <p>The extension of the CAZ boundary (and removal of the Core CAZ designation) will align with the approach set out in the London Plan.</p> <p>St John's Wood is not designated as a centre for leisure and recreation uses in the City Plan. Recognition is however given that there is currently a lack of leisure and community facilities within the District Centre.</p>
Comment	

⁴⁹ TfL Commercial Development Planning Team

⁵⁰ Defence Infrastructure Organisations, Imperial College NHS Healthcare Trust, TfL Commercial Development Planning Team, NHS Property Services

⁵¹ Belgravia Society

⁵² Pimlico Neighbourhood Forum

⁵³ Knightsbridge Neighbourhood Forum

⁵⁴ Belgravia Society

⁵⁵ Belgravia Society

<ul style="list-style-type: none"> • The inclusion of part of Belgravia to the north west of Buckingham Palace Road in the Victoria Opportunity Area is strongly objected to. In particular, concerns are linked with the possibility that inappropriate development including tall offices could be brought forward by the arrival of Crossrail 2 in the area⁵⁶. • A number of indicators suggest growth in Central London might halt or reverse. It should make clear on what basis the continued growth of Westminster City is assessed⁵⁷. • The current City Plan designates Pimlico as predominantly residential and limits commercial development to specific parts to meet specific demand. This should continue: commercial development should be concentrated in the area bounded by Vauxhall Bridge Road, Gillingham Street, Guildhouse Street and Warwick Way, with areas outside this having commercial development only on the existing short parades of shops and restaurants/pubs (many of which have already been converted to residential) and existing commercial or office locations⁵⁸. • The CAZ, which presently includes Belgrave square, Grosvenor Crescent and a small area of Grosvenor Place site, is no longer appropriate to this part of Belgravia. This is a historic designation that does not reflect the current residential character of the area. The statement in the reasoned justification on policy S1 "bringing new residents into CAZ will contribute to the balance, variety and vibrancy of areas in CAZ" is not agreed with, and this designation should be removed⁵⁹. • A detailed policy review should be undertaken to allow scope for additional growth in the NWEDA, which has some 	<p>Any development proposal would be subject to assessment of suitability including any type of detrimental effects, in line with the policies in the City Plan.</p> <p>The scale of growth in the city is in line with ONS population growth predictions and the standard methodology for calculating housing need and informed by the London-wide SHMA and SHLAA, as well as Westminster's own growth projections. Levels of commercial growth are also consistent with GLA projections.</p> <p>Support for the existing approach to residential development in Pimlico is noted, and the revised City Plan policies continue to recognise there are parts of the CAZ that are predominantly residential.</p> <p>The council keeps the boundary of the CAZ under review and has considered protecting the characteristics of the Belgrave square area in the revised City Plan. However evidence was not strong enough for a boundary change.</p> <p>Newly commissioned evidence by the council to support the building height policies has informed the approach to building height in the City Plan.</p> <p>The council supports the view that the Grand Union Canal provides considerable potential to enhance the NWEDA. Opportunities to enhance the Grand Union Canal and its surroundings, providing joint benefits for the local community. Future developments should be part of a long-term vision for the area.</p>
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⁵⁶ Belgravia Society

⁵⁷ Belgravia Society

⁵⁸ Pimlico Neighbourhood Forum

⁵⁹ Belgravia Society

<p>potential for non-residential uses in addition to housing developments⁶⁰. Consideration should also be given to defining the wider NWEDA as an area that is suitable for taller forms of development⁶¹.</p> <ul style="list-style-type: none"> • The City Plan Policy S12 (NWEDA) should be re-worded to highlight the potential for the Grand Union Canal to enhance the Development Area, rather than be seen as having a similar poor local environment to that of the Westway or rail network. A separate priority could promote the enhancement of the Grand Union Canal, its towpath and surroundings, which can help support the well-being of the local community⁶². • It would be useful to review the opportunity areas as they mature⁶³. 	<p>Opportunity Areas are designated by the Mayor of London. However, the council will keep the detailed boundaries of the Opportunity Areas under review.</p>
<p>Support with qualification</p> <ul style="list-style-type: none"> • Landowners are generally supportive of a review which seeks to define the appropriate boundary for the West End, which should be extended beyond the West End Special Retail Policy Area as currently drawn. The review should define the respective roles of the CAZ and the West End⁶⁴. The CAZ should remain the primary land use designation⁶⁵ and commercial land uses continue to be the priority within the CAZ⁶⁶. Consultees would be keen to see the new West End designation embed some of the employment and commercial space targets agreed by the West End Partnership⁶⁷. Any designation covering the Core CAZ 	<p>Support noted. The CAZ boundary has been aligned with the Mayor's CAZ area. The council will co-operate with the West end Partnership to establish a policy approach for the West End. The Core CAZ designation has been removed given its policy objectives can be met through the expansion of the WERLSPA.</p> <p>Opportunity Areas are designated by the Mayor of London. However, the council will keep the detailed boundaries of the Opportunity Areas under review.</p>

⁶⁰ TfL Commercial Development Planning

⁶¹ NHS Property Services

⁶² Canal and River Trust

⁶³ Mayor of London

⁶⁴ Shaftesbury, Westminster Property Association

⁶⁵ Westminster Property Association

⁶⁶ Land Securities, Westminster Property Association

⁶⁷ The Westminster BID

<p>should continue to promote an improved public realm and focus on pedestrians in the West End⁶⁸.</p> <ul style="list-style-type: none"> • This policy change is supported and the alignment of Westminster's CAZ area boundary with the Mayor's CAZ welcomed⁶⁹. The precise boundaries of the Opportunity Areas should also be adjusted, especially where close to but not aligned to the CAZ boundaries⁷⁰. 	
<p>5. Changes and simplification of policies adopted as part of the Mixed-Use revision</p>	
<p>Objection</p> <ul style="list-style-type: none"> • More than one consultee⁷¹ objected to the removal of the 30% commercial uplift allowance without providing any residential floorspace. Some consultees⁷² argued that this will significantly impact on the viability of smaller sites and their ability to be redeveloped. New policies, whilst supporting the delivery of more housing, should recognise the challenge of seeking to deliver housing on site as part of smaller or medium-sized developments⁷³. 	<p>The City Plan sets out a strategy to meet a range of development needs, including residential and commercial. The council has commissioned a viability assessment to test the policies in the City Plan for their impact on the viability of a range of development types. The council recognises that a range of sites have the capacity to deliver housing, and the City Plan's policies will set out a positive strategy to facilitate this.</p>
<p>Comment/Concern</p> <ul style="list-style-type: none"> • Concerns that reversing mixed use policy will de-incentivise office development within central London⁷⁴, which will in turn affect the wider property industry⁷⁵. Reversing the current mixed-use policy might make long-term investment plans financially unviable⁷⁶ and it is suggested that the resulting reduced flexibility will negatively affect the delivery of housing 	<p>The council has tested the viability of all policies in the City Plan to assess whether development of a range of types and on a range of sites remains viable, including affordable housing. The council is therefore confident that the policies in the revised City Plan will not negatively impact on market conditions. Comments regarding the provision of residential accommodation on site, including in different locations in the city and off-site provision, will be considered as part of the review of the mixed-use policy in the revised City Plan.</p>

⁶⁸ Heart of London

⁶⁹ Mayor of London, Westminster Property Association

⁷⁰ Westminster Property Association

⁷¹ Carter Victoria Limited c/o Tellon Capital, Westminster Real Estate Ltd, Shaftesbury

⁷² Carter Victoria Limited c/o Tellon Capital, The Westminster BIDs, Westminster Real Estate Ltd

⁷³ The Westminster BIDs

⁷⁴ King's College London, Shaftesbury

⁷⁵ King's College London

⁷⁶ King's College London

<p>itself⁷⁷. One consultee⁷⁸ has requested that the removal is carefully reviewed to ensure that the deliverability of housing is not hindered. The quantum of affordable housing required should not prejudice development through excessive affordable housing obligations⁷⁹.</p> <ul style="list-style-type: none"> Concerns over requirements for on-site housing provision, likely to make smaller or medium-sized development unviable and potentially inappropriate in commercially-led areas⁸⁰ such as the CAZ or the West End. There should be a clear recognition of where residential accommodation is likely to be more appropriate⁸¹, and a clear but flexible approach when the delivery of housing on-site is not possible/not ideal should be encouraged⁸². One consultee⁸³ has highlighted that there are practical issues connected with on-site provision of residential units when these form part of a development, such as the need to provide separate access points and cores for each use, which would reduce the overall amount of useable floorspace. There is support to saving (with some amendments) Policy S6: Core CAZ, in terms of allowing residential floorspace to be provided off-site in the vicinity⁸⁴. 	
<p>Comment</p> <ul style="list-style-type: none"> Given the recent changes in mixed use policy, some consultees⁸⁵ find the reason behind another review of these policies unclear. Consultees think the council should provide 	<p>The review of the City Plan is the right time to reconsider the policy approach across a range of topics. The mixed-use policy, together with the other policies in the revised City Plan, is supported by a viability assessment. Various affordable housing scenarios have</p>

⁷⁷ Carter Victoria Limited c/o Tellon Capital

⁷⁸ Carter Victoria Limited c/o Tellon Capital

⁷⁹ Defence Infrastructure Organisations

⁸⁰ Heart of London, The Westminster BIDs

⁸¹ The Westminster BIDs

⁸² Universities Superannuation Scheme

⁸³ Universities Superannuation Scheme

⁸⁴ Heart of London

⁸⁵ Church Commissioners for England, Westminster Property Association

<p>a clear evidence base for this⁸⁶. Should changes to these policies be necessary, they should continue to focus on the key twin land use objectives of delivering affordable housing and supporting economic growth⁸⁷.</p> <ul style="list-style-type: none"> • Some⁸⁸ suggest that should mixed use policy be changed, it should require affordable housing provision only, rather than all housing (the amount of affordable housing required should be the amount that would be required under current affordable housing policy as applied to half of the increase in commercial floorspace). • Actively managed high quality small, market-rented apartments should be encouraged, as they provide scope to meet the needs of a highly mobile and transient resident population within the CAZ. The requirement for 'family' accommodation in the CAZ should also be reviewed⁸⁹. • Policy should cater positively for those who choose to live and work from the same premises and would welcome a consideration over the creation of a flexible residential/business local use class⁹⁰. • With regards to the mixed-use policy of the recent past, some consultees⁹¹ stress the fact that it has choked the supply of office floorspace, particularly in the CAZ. Also, although housing delivery has significantly outperformed commercial delivery, the overall general housing needs of Westminster residents were not met⁹². • Planning policies should recognise the benefits of upgrading existing office accommodation and the disincentive that a 	<p>been tested as part of this viability assessment, as well as the provision of various mixes and tenures, which informs the policy approach in the City Plan. The council will seek to achieve a balanced provision of uses, including commercial and residential. The City Plan sets out which uses will be supported in which areas, including on upper floors, which will provide clarity and certainty for businesses. Changes to the use classes order are outside the power of the council.</p> <p>Article 4 Directions are beyond the remit of the revised City Plan. However, the council has introduced an Article 4 Direction to remove permitted development rights for the change of use of office to residential use in the CAZ.</p> <p>The City Plan includes new housing policies to deal with new and emerging different types of housing such as 'live work' units, as well as a revised policy position on the proportion of family sized housing which is required.</p> <p>The council is not minded to offer blanket flexibility in change of uses across large parts of the city to ensure that uses can be carefully managed and balanced and amenity for residents and commercial occupiers is maintained.</p> <p>The City Plan will support in principle complementary town centre uses above retail in commercial areas.</p>
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⁸⁶ Land Securities, Westminster Property Association, Shaftesbury

⁸⁷ Westminster Property Association

⁸⁸ Westminster Property Association

⁸⁹ Shaftesbury

⁹⁰ Shaftesbury

⁹¹ Westminster Property Association, Westminster Real Estate Ltd, Carter Victoria Limited c/o Tellon Capital

⁹² Westminster Property Association

<p>financial contribution for new residential can have on bringing forward sustainable development. It should support the extension and upgrading of existing office accommodation including the potential for change of use to other commercial uses or residential where appropriate. Revised policies should not introduce new requirements to provide on-site residential accommodation as part of extensions or new build office accommodation⁹³.</p> <ul style="list-style-type: none"> • A clear but flexible approach⁹⁴ to deliver a great quantum of affordable housing in designated Housing Renewal Areas and in areas of comparatively lower land values⁹⁵ is needed. • As demand continues to stay high, B1 office floorspace should continue to be protected from conversion to C3 (residential) as per existing Article 4 direction for the Core CAZ⁹⁶. • Areas should be identified where a range of uses will be acceptable and planning policies framed to encourage those uses to come forward. Planning permission can then be granted for a range of uses on a single site or Local Development Orders introduced to allow changes of use to take place as of right. This would allow landowners and tenants to respond faster to market signals without the need to make further planning applications. As long as overall levels of floorspace in different uses remain within broad, identified parameters, there are many areas of Westminster where it does not matter whether a property is in one use or another. Those areas where it does matter are designated as Special Policy Areas, but in those areas that are not, much greater flexibility can and should be maintained. This approach to flexible uses would have wider public benefits in 	<p>The City Plan is restricted in the protection it can offer sui generis uses by the use classes order. The plan will offer support for the development of new, and encourage the retention of existing, sui generis uses where they are deemed to contribute to the local area and are appropriate.</p>
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⁹³ Universities Superannuation Scheme

⁹⁴ The Westminster BIDs, TfL Commercial Development Planning Team, Westminster Property Association

⁹⁵ The Westminster BIDs

⁹⁶ Heart of London, The Westminster BIDs

<p>terms of maintaining fewer vacancies and creating greater ability for businesses to create value efficiently⁹⁷.</p> <ul style="list-style-type: none"> • One consultee⁹⁸ would encourage the Council to consider allowing more diversity of uses within the same plot, for instance with A1 on the ground floor, and A3/4 or alternative commercial (non B1) uses on upper floors. • One consultee⁹⁹ have argued that since Policy S52 which provided protection for non-A1 uses was deleted in 2010, sui generis uses like builders' merchants have not been protected by policies to protect employment uses within emerging development plans. They stress on the contribution that sui generis uses can bring to local employment, the vitality of the high street and to increasing land value. This comment is not necessarily restricted to the CAZ. 	
<p>Support with qualification</p> <ul style="list-style-type: none"> • Simplification is generally supported¹⁰⁰. Consultees stress on the need of finding the right balance between the international importance and economic competitiveness of the City, the operational needs of business and the need for new housing¹⁰¹. 	<p>Support noted. The revised City Plan contains revised objectives and policies which strike a balance between the different interests and needs of stakeholders and groups in the city.</p>
<p>6. Changes to business and employment policies</p>	
<p>Comment</p> <ul style="list-style-type: none"> • More than one consultee¹⁰² comment that changes in policy should focus on supporting and delivering employment floorspace, without seeking to introduce requirements for subsidised or discounted employment space, as the market is already providing for a range of flexible workspaces suitable for SMEs. They also add to this point suggesting that 	<p>Comments have been noted. The council seeks the provision of a range of employment uses, while recognising that different uses are more appropriate in certain areas than others. While the City Plan will retain an employment jobs target, it will also acknowledge the limitations of accurately transferring this to a floorspace target given the changing nature of working practices.</p>

⁹⁷ McKays Securities

⁹⁸ Universities Superannuation Scheme

⁹⁹ Travis Perkins

¹⁰⁰ TfL Commercial Development Planning

¹⁰¹ Heart of London, The Westminster BIDs

¹⁰² Westminster Property Association, Land Securities

<p>the review should retain an overall minimum target for employment floorspace, as set out in Policy S18, and a similar target for office floorspace, as set out in Policy S20, and would welcome an upwards review of these targets against evidence test¹⁰³.</p> <ul style="list-style-type: none"> • On the other hand, one consultee¹⁰⁴ is against the use of policy to focus upon the provision of a range of workspace requirements, as they believe it is unnecessarily and risks interfering in the functioning of the office leasing and investment market. • It is important to continue to enable the location of small businesses in the Pimlico area in order to sustain the retail and restaurant economy¹⁰⁵. • Generally supported, but some concerns over office spaces taking up residential units¹⁰⁶. • Given the differential between residential and business value, RBKC's assessed need for offices likely to still not be met so would value the support for the provision of business premises within Westminster¹⁰⁷. • Consultees are keen on working together with the Council to inform and support the delivery of policies to encourage employment opportunities to Westminster residents¹⁰⁸. 	<p>Small businesses in defined parts of Pimlico will continue to be supported to enhance town centre vitality and viability.</p> <p>The council will continue to work closely with its partners and neighbouring boroughs, including the Royal Borough of Kensington and Chelsea, to refine the employment approach business space in the revised City Plan.</p> <p>City Plan policy will seek to ensure residents benefit from the opportunities economic growth brings.</p>
<p>7. Changes to policy S20 Offices and other B1 floorspace</p>	
<p>Comment</p> <ul style="list-style-type: none"> • Policy support for a range of types, formats and sizes, including innovative, flexible forms of employment space¹⁰⁹, which are being encouraged by the market, as well as 	<p>Support has been noted. The City Plan sets out a positive approach to innovative housing and commercial uses</p>

¹⁰³ Land Securities, Westminster Property Association

¹⁰⁴ Shaftesbury

¹⁰⁵ Pimlico Neighbourhood Forum

¹⁰⁶ Belgravia Society

¹⁰⁷ Royal Borough of Kensington and Chelsea

¹⁰⁸ The Westminster BIDs

¹⁰⁹ The Westminster BIDs

<p>retail/leisure, which may not relate precisely to town planning use classes - would be welcome¹¹⁰.</p> <ul style="list-style-type: none"> Consider the approach taken by other central London boroughs towards delivering “affordable workspace” instead of additional residential floorspace, especially in areas that are overwhelmingly commercial (eg. in the Core CAZ where increased business rates, higher rents and staff costs, and economic uncertainty make businesses less sustainable)¹¹¹. 	<p>The council will support the provision of affordable workspace and spaces for SMEs. Within core commercial areas, such spaces can be provided through the inclusion of shared workspace within new developments.</p>
<p>8. A review of retail policies to include the addition of an exception to policy S21 Retail</p>	
<p>Comment/Concern</p> <ul style="list-style-type: none"> Concerns has been raised over the Article 4 Direction which removed banks' ability to open new stores without a change of use application, particularly given the onerous policy tests set out in the current City Plan. As an essential high street service, banks should operate in a similar manner to modern retail, lifestyle and leisure uses in retail centres. In order to enable A2 Banks to open new stores within Westminster's high streets, it is important that all retail policies are reviewed to incorporate support for A2 bank and building society uses which contribute to the vitality of the high street¹¹². The flexibility shown in recent times in accommodating more A3 uses within the 'West End Special Retail Policy Area' on the north side of Coventry Street has been welcomed, however there is a concern on policies in the Core CAZ or Special Retail Policy Area to deliver substantial new homes¹¹³. The impact of freight and how to manage it is not dealt with to any great extent in the existing plan. Delivery and Servicing Plans (DSPs) are fundamental to ensure the coordination and mitigation of the impact of freight on the public realm and air quality. At present, DSPs for new 	<p>Article 4 Directions are beyond the remit of the City Plan. The City Plan contains up-to-date and revised policies that make sure that Westminster's town centres remain viable. A2 uses will be acceptable in principle in town centres subject to other policies in the plan.</p> <p>The revised City Plan sets out a strategy for the West End Retail and Leisure Special Policy Area which includes support for A3 uses of appropriate scale and location. The City Plan will contain policies that manage residential and mixed-use development in the Central Activities Zone and across the city, seeking to achieve an optimal balance between commercial, residential and other uses.</p> <p>The impact of freight in the Westminster context is an important issue with a wide range of implications and is addressed in a City Plan policy specifically relating to servicing and freight.</p>

¹¹⁰ The Westminster BIDs, Westminster Property Association

¹¹¹ Heart of London, The Westminster BIDs

¹¹² Metro Bank

¹¹³ Heart of London

<p>developments in Victoria seem to be based on 'perfect day' scenarios, where vehicles of the right kind arrive on time and site staff are available to deal with vehicles. The reality is likely to be 'messier'. Consultees strongly suggest that the Council provides area-specific guidelines on drawing up DSPs in Westminster and that this guidance is drawn up by public realm staff, highway teams and air quality staff.¹¹⁴.</p>	
<p>Comment</p> <ul style="list-style-type: none"> • Some consultees have expressed continued support for the Council's Article 4 Direction in respect of A1 and A2 uses to protect the amount of shops and retail floorspace in the City¹¹⁵. • Some considerations on streetscape and the public realm are made. Vacant shop fronts can negatively impact on the public realm and a consultee¹¹⁶ would like to have this issue referenced in the plan. The consultee also points out how well-managed public toilets are a valuable community asset and that an appropriate provision is an important component of providing healthy, walkable streets, and would like this matter to be included in the main body of the plan¹¹⁷. The negative impacts utility works have on footways should be referred to in the Infrastructure and Development Impacts section along with ways in which the Council seeks to mitigate such impacts¹¹⁸. • As the nature of retail is rapidly evolving to comprise a broader spectrum of activities within the 'retail' environment, some consultees are encouraging the Council to produce policies that are more flexible¹¹⁹, able to reflect the changing 	<p>Support for Article 4 Direction's is noted. However, this is outside of the remit of the City Plan.</p> <p>The issues surrounding the vacancy of shop fronts are recognised. The City Plan contains policies to allow temporary uses in vacant shops under certain circumstances, in recognition of their benefits.</p> <p>Provision of public toilets is important to provide a positive visitor experience in Westminster, a top international tourist destination as well as the heart of London, and the emerging policies of the City Plan will set out requirements to provide these in developments of a certain type or size.</p> <p>The City Plan is supported by an emerging Infrastructure Delivery Plan which assesses and plans for a range of infrastructure types including utility provision.</p> <p>The council recognises that the retail environment is changing, and therefore seeks to provide up-to-date policies in the revised City Plan to manage retail and other main town centre uses to maintain viable</p>

¹¹⁴ Victoria BID

¹¹⁵ Heart of London

¹¹⁶ Victoria BID

¹¹⁷ Victoria BID

¹¹⁸ Victoria BID

¹¹⁹ Heart of London, Knightsbridge Neighbourhood Forum, Land Securities, Westminster Property Association, Shaftesbury, The Westminster BIDs

<p>role of the high street in an evolving retail environment¹²⁰, and which can incentivise more "experiential time"¹²¹.</p> <ul style="list-style-type: none"> • One consultee¹²² also stresses on the importance of encouraging uses which drive footfall (eg. banks) in an era where online shopping is changing the appeal of traditional retail to attract customers to the high street. In light of this, there is an emphasis on the need for the policies surrounding the 'protection of retail uses' to undergo complete revision¹²³. The view is that these could help keep London "Open for Business" and support the economy in the "post-Brexit" world¹²⁴. • Amenity shops which serve the local community, together with small scale speciality boutiques, should be protected. If a retail unit becomes unviable, a change to residential use should be preferred to that to another commercial use¹²⁵. 	<p>town centres. The loss of retail to residential (as opposed to other town centre uses such as cafes, restaurants, offices or leisure facilities) could undermine town centre vitality and viability.</p>
<p>Support with qualification</p> <ul style="list-style-type: none"> • The current approach is supported in so far as the impact of new retail development on the vitality of neighbouring centres, including those beyond the City's boundaries, continues to be assessed¹²⁶. • This direction of travel with regard to an exemption for development which provides a "better mix of uses, or more unique uses" is supported as long as that is sympathetic to the character and function of the area¹²⁷. 	<p>Support noted. The council will continue to monitor the performance of its centres and sets out specific policies to make sure uses contribute to the character of the centre and wider area.</p>
<p>Support</p>	

¹²⁰ Metro Bank, Shaftesbury

¹²¹ Heart of London, Shaftesbury, The Westminster BIDs

¹²² Metro Bank, Shaftesbury

¹²³ Shaftesbury, Metro Bank

¹²⁴ Shaftesbury, Westminster Property Association

¹²⁵ Belgravia Society

¹²⁶ Royal Borough of Kensington and Chelsea

¹²⁷ Heart of London

<ul style="list-style-type: none"> These elements of the review are fully supported¹²⁸. 	Support noted.
9. Review of policies on the night-time economy and, in particular, the concept and policy wording of the existing 'Stress Areas'	
<p>Comment</p> <ul style="list-style-type: none"> Some consultees have pointed out how operational issues on businesses can be restrictive and a coordinated approach to planning, licensing and street management is recommended to unlock potential growth¹²⁹. A number of consultees¹³⁰ believe the review should consider distinguishing between evening uses, such as restaurants and theatres, and late night uses such as clubs and music venues, as suggested within the March 2014 "Food, drink, entertainment, arts and culture" booklet. Different evening uses have very different impacts on residential amenity and they would find it helpful to distinguish between these. Local residents disagree with the proposed relaxation of policy restrictions on entertainment uses and would rather call for stricter requirements for activities to contribute to reducing the cumulative impact on the current stress areas¹³¹. More than one consultee would welcome a review around the concept and policy wording of the existing 'Stress Areas'¹³². One consultee¹³³ supports the review of these policies in particular within the Edgware Road Stress Area. It is also requested that the Council recognises the specific 'stress' already existing in Knightsbridge¹³⁴. 	<p>Comments are noted. The council recognises the strong connections between licensing and planning, which will be reflected in the evening and night-time policies of the revised City Plan and through a revised Licensing Policy which will sit outside of but complement the City Plan.</p> <p>The revised policy approach in the City Plan distinguishes between evening- and night-time uses as well as on the basis of the size of the uses. Support for this approach is noted.</p> <p>Concerns regarding the relaxation of policy restrictions are noted and have been addressed by requiring applicants to consider the impacts of over-concentration.</p> <p>The council will continue to monitor the over-concentration of particular uses and sets out a more flexible policy approach to be able to address relevant issues.</p>
Support with qualification	

¹²⁸ TfL Commercial Development Planning

¹²⁹ Heart of London

¹³⁰ Church Commissioners for England, Westminster Property Association, Shaftesbury

¹³¹ Belgravia Society

¹³² British Beer & Pub Association, Church Commissioners for England, Shaftesbury

¹³³ Church Commissioners for England

¹³⁴ Knightsbridge Neighbourhood Forum

<ul style="list-style-type: none"> Businesses seem generally in support of a more positive approach to the evening and night time economy¹³⁵, as well as to relaxing the policy restrictions on entertainment uses¹³⁶. Consultees encourage a greater diversity of activities in the evening and night-time economy¹³⁷, such as later opening for restaurants, cultural institutions, theatres and shops. Initiatives such as museum "lates" are encouraged. A diverse culture and night time economy offer has the potential to lead to a more inclusive and responsible street culture at night, with a wider range of groups attracted to the evening and night time economy¹³⁸. On the other hand, they appreciate and stress on the need of finding the right balance between the vitality of town centres and the amenity of neighbouring residents. This concern is shared by local neighbourhood associations and neighbouring local authorities¹³⁹. Developments outside the existing commercial areas should be resisted to protect residential amenity¹⁴⁰. 	<p>Support is noted. The council encourages diversification of the night-time economy but also recognises that it is necessary to place restrictions on the types and sizes of uses that may be appropriate in particular areas to maintain the character of areas and preserve businesses of a particular scale.</p>
<p>10. Clarification on the policy position on tall and higher buildings</p>	
<p>Objection</p> <ul style="list-style-type: none"> There was one strong objection against the use of the two separate terms 'higher' and 'tall', the distinction between which could cause confusion and lead to unsustainable development¹⁴¹. 	<p>Concerns have been noted. The policy on building height in the City Plan is clear on what the council considers to be a tall building relating to local context.</p>
<p>Comment/Concern</p> <ul style="list-style-type: none"> There is a concern that waterways which fall within designated areas are considered appropriate for substantial growth, and that tall buildings could put the canals at risk of 	<p>As part of its revised City Plan policy on building height, the council gives particular consideration to the need to avoid harm on sensitive settings.</p>

¹³⁵ Mayor of London, Heart of London, Church Commissioners for England, Land Securities, Shaftesbury, Westminster Property Association, Westminster Real Estate Ltd

¹³⁶ Shaftesbury

¹³⁷ Heart of London, Land Securities

¹³⁸ Heart of London

¹³⁹ Belgravia Society, Royal Borough of Kensington and Chelsea

¹⁴⁰ Pimlico Neighbourhood Forum

¹⁴¹ Historic England

<p>potential adverse impacts. The concern for the potential negative impact of tall buildings around Westminster's waterways include: potential impact on the heritage value of the waterways, potential adverse wind impacts, and overshadowing of the waterspace and towpath¹⁴².</p>	
<p>Comment</p> <ul style="list-style-type: none"> • There should not be an assumption that the only way to deliver high densities is through tall buildings and tall and large buildings should not have an unacceptably harmful impact on their surroundings¹⁴³. • A clear definition of what is meant by "tall buildings" is required¹⁴⁴ to facilitate a transparent and reasonable understanding of the acceptability of scale being proposed across the borough, and the application of relevant policy tests when assessing a specific scheme¹⁴⁵. • The scarcity of available land within the City is recognised, as is the need for it to be used more efficiently to accommodate further growth. Where appropriate, tall buildings should be considered as a part of a range of solutions to deliver more floor space within central London¹⁴⁶. • The revision should provide clear support for intensification and densification, including some additional height, through appropriate changes to design policies to enable growth, especially within the CAZ and Opportunity Areas¹⁴⁷ and around commuter hubs¹⁴⁸. The areas around Victoria and Paddington stations are more suitable to accommodate significant development, providing both additional housing 	<p>Providing future growth in Westminster is a challenge which requires a diversified and creative approach which involves modifications to the existing building stock where circumstances allow, sensitive rear and side extensions, upward extensions, smaller infill as well as conservation-led regeneration and efficient new developments with higher densities in those areas where opportunities arise. The emerging City Plan indicates geographical areas where higher buildings may be suitable. Furthermore, the City Plan provides clear guidance on growth principles and building height policies. The council is not minded to set in policy an appropriate number of storeys for new buildings as what is appropriate will be different in every circumstance depending on the character, design and heritage etc. of the site and the proposals. Setting a limit on the number of storeys can be restrictive or can be seen as a target – both of which are unhelpful for successful place shaping.</p> <p>The approach to tall and higher buildings will be in general conformity with the policies provided in the London Plan including regarding strategic views. The revised City Plan will set out a policy framework to prevent any adverse impacts on important views of metropolitan significance or heritage and conservation.</p>

¹⁴² Canal and River Trust

¹⁴³ Royal Borough of Kensington and Chelsea

¹⁴⁴ NHS Property Services, TfL Commercial Development Planning

¹⁴⁵ NHS Property Services

¹⁴⁶ Church Commissioners for England, Defence Infrastructure Organisations, Imperial College NHS Healthcare Trust, Westminster Property Association

¹⁴⁷ Land Securities, Westminster Property Association

¹⁴⁸ Defence Infrastructure Organisations

<p>and significant funding required to contribute to the expansion of the rail network¹⁴⁹.</p> <ul style="list-style-type: none"> • It is considered appropriate that a building which is no less than 'substantially' higher than surrounding buildings should be considered 'tall'. Setting a rigid storey height threshold may render the preparation of planning applications and the assessment of schemes unnecessarily onerous in suitable location. It is advised that tall buildings are rather assessed on a case-by-case basis depending on the context (taking account of matters such as location of other tall buildings or transport node interchanges)¹⁵⁰. The potential impact of buildings on the built form of the surrounding area should be rigorously appraised¹⁵¹. One consultee further recommended that a cross-borough area-based approach would be more appropriate than an assessment done within single borough boundaries¹⁵². 'Tall Building Zones' could be introduced¹⁵³. • Conversely, a consultee is of the view that new buildings higher than 8 storeys would generally be out of place, even 7 stories in some areas, as most of the historic area is 5-7 storeys. No development higher than this should be allowed unless it can be demonstrated that it does not affect any of the historic views or the setting of listed buildings and residential squares¹⁵⁴. Others are of the view that especially since the Grenfell Tower tragedy, high and tall buildings should not be used for residential purposes¹⁵⁵. 	<p>Planning briefs are not Development Plan Documents and therefore outside of the remit of the City Plan revision.</p>
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¹⁴⁹ Network Rail

¹⁵⁰ NHS Property Services, TfL Commercial Development Planning

¹⁵¹ Canal and River Trust, City of London, Historic England, Pimlico Neighbourhood Forum, Royal Borough of Kensington and Chelsea

¹⁵² Knightsbridge Neighbourhood Forum

¹⁵³ NHS Property Services

¹⁵⁴ Pimlico Neighbourhood Forum

¹⁵⁵ Belgravia Society

<ul style="list-style-type: none"> • One consultee would particularly seek clarity on the status of Victoria Opportunity Area and the Victoria Area Planning Brief, which acts as guidance for building height in Victoria¹⁵⁶. • One consultee¹⁵⁷ have stressed on the importance of assessing the potential impact of buildings of various heights and forms on surrounding heritage assets and the general historic character of the areas that might be affected. Careful consideration is sought in particular on the impact that tall buildings might have on Westminster's waterways, with particular regard to potential environmental and amenity impacts. • Ensure buildings are well designed whatever their size, but the bigger and more conspicuous they are, the more important it is that they should be well considered. Where tall buildings exceptionally protrude above the skyline when viewed from within a designated landscape, these should be of significant architectural merit¹⁵⁸. • A review of the significance of protected local views would also be welcomed, with clear visual guides included¹⁵⁹. 	
<p>Support</p> <ul style="list-style-type: none"> • Businesses have shown to be generally supportive of the direction of travel set out in "Building Height – Getting the Right Kind of Growth" and acknowledge that in order to retain economic competitiveness building higher and more densely at appropriate locations is necessary to deliver additional floorspace and jobs¹⁶⁰. • A revision of design policies and those concerning tall buildings is welcome, and an increased density in the City could be achieved through a complete reappraisal of 	<p>Support noted.</p>

¹⁵⁶ Victoria BID

¹⁵⁷ Canal and River Trust

¹⁵⁸ London Parks and Gardens Trust

¹⁵⁹ TfL Commercial Development Planning

¹⁶⁰ Heart of London, Land Securities, Royal Borough of Kensington and Chelsea

<p>opportunities within conservation areas, including the identification of opportunities for rooftop extensions¹⁶¹.</p>	
<p>11. A review of the uses protected by the St. James's Special Policy Area</p>	
<p>Comment/Concern</p> <ul style="list-style-type: none"> Some consultees have raised concerns over the relaxation of the uses protected in the St James's Special Policy Area¹⁶², in particular around private members' clubs. These are seen as part of the fabric and character of the area, operate out of bespoke heritage assets that were built for that particular use, are complementary to a number of cultural institutions, and are a key part of what draws visitors to an area¹⁶³. The application of policy protecting certain categories of users – as distinct from town planning use classes – can create significant unintended consequences, whereby landlords avoid letting premises to protected occupiers. It is suggested that the application of this policy is reviewed to consider if changes could be made to continue to protect existing occupiers, whilst encouraging landlords to let premises to new occupiers¹⁶⁴. 	<p>Comments have been noted. The council will continue to protect specific uses that are important for the character of this area, including the art and antiques trade. Explicit support for the protection of private members' clubs is no longer considered a priority under the council's 'City for All' corporate strategy.</p> <p>The council considers that it is justified to protect specific types of uses in areas where they make a significant contribution to the character of the area, and therefore have been given a Special Policy Area designation.</p>
<p>Comment</p> <ul style="list-style-type: none"> There is support for the efforts the Council has made to protect galleries through the establishment of the two SPAs and through intervention in planning applications, most notably in Cork Street¹⁶⁵. 	<p>Support noted.</p>
<p>12. A review of all 'design' policies, including potential for minor amendments and simplification to the basement policy</p>	
<p>Comment/Concern</p> <ul style="list-style-type: none"> The draft heritage policies in booklet 15 are much reduced as compared to the adopted UDP policies. The need to ensure development in conservation areas and affecting listed 	<p>Comments have been noted. The existing policy has been reviewed several times in drafting the revised City Plan and revised policy retains the substance of original policy and brings these up-to-date to</p>

¹⁶¹ Shaftesbury, Church Commissioners

¹⁶² Belgravia Society, Heart of London

¹⁶³ Heart of London

¹⁶⁴ Westminster Property Association

¹⁶⁵ The Society of London Art Dealers and The British Antique Dealers Association

<p>buildings needs to be carefully addressed particularly in terms of demolition¹⁶⁶.</p>	<p>be in line with current national policy while maintaining strong protection for heritage assets while at the same time providing clarity for residents and developers.</p>
<p>Comment</p> <ul style="list-style-type: none"> • It is unclear whether heritage policies will be incorporated in the new City Plan. The Pimlico Design guide has an important status in current planning applications and it is important that this is not lost through the current revision¹⁶⁷. • Additional basement development (i.e. below the current basement levels which are the level immediately below street level) is not suitable for the Pimlico area as the narrow historic streets simply cannot take the extensive lorry movements that would follow if these developments were to happen at scale¹⁶⁸. • UDP Policies incorporate reference to the Conservation Area Audits programme and integrate audits into policy. The new policy framework should do too, and the Council should expedite completion of its Conservation Area Audits¹⁶⁹. • A map of the Archaeological Priority Areas (APAs) for Westminster, which have been recently reviewed by the Greater London Archaeological Advisory Service (GLAAS) in conjunction with the Council, should be incorporated in the new City Plan¹⁷⁰. It is also recommended that the Council finalise their new World Heritage Site (WHS) management plan as soon as possible. Furthermore, a 3-D modelling system should be developed to allow a more dynamic system of views protection, and views from 'non-traditional' places should be considered. The new local plan monitoring framework should include an indicator that reflects change 	<p>The revised City Plan contains updated and revised heritage policies. The council will review its design guides and supplementary planning documents in light of the revised City Plan, where appropriate.</p> <p>The revised City Plan sets out the principles for basement development on a city-wide level. These principles are applicable to all areas in Westminster and seek to prevent and/or mitigate any negative effects that basement developments might have.</p> <p>The emerging City Plan makes references to Conservation Area Audits as important tools to guide and to assess development schemes.</p> <p>The City Plan references the Archaeological Priority Areas in Westminster, which have recently been reviewed and includes a map. The management plan will be finalised following publication of the draft plan, a buffer zone is not considered appropriate for Westminster and is not supported by steering group members but work on 3D modelling is being progressed.</p> <p>The council has its own construction guidelines – the Code of Construction Practice. Neighbourhoods have the potential to set out any additional standards as part of the neighbourhood planning process.</p>

¹⁶⁶ Historic England

¹⁶⁷ Pimlico Neighbourhood Forum

¹⁶⁸ Pimlico Neighbourhood Forum

¹⁶⁹ Historic England

¹⁷⁰ Historic England

<p>within the historic environment in response to development proposals and a buffer zone could be defined to inform future development in the vicinity of the WHS¹⁷¹.</p> <ul style="list-style-type: none"> • Elements of the KNF's Construction Activity policy and related Annex titled 'Knightsbridge construction standards and procedures' (previously Knightsbridge Code of Construction Practice) should be incorporated in any new basement or construction related policies¹⁷². • Regard must be had to the impact that developments will have upon the surrounding area in terms of the impact on the built form¹⁷³. 	<p>The impact of development on its surroundings is an important consideration in many policies in the City Plan including visual impact, amenity, character and type of development.</p>
<p>13. An update of policy S29 Health, Safety and Well-being</p>	
<p>Comment/Objection</p> <ul style="list-style-type: none"> • Indoor and outdoor sport facilities should be included in the City Plan and these should be based on a robust and up-to-date evidence base, such as Playing Pitch and Built Facility Strategies, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed. These would provide a clear strategy and action plan with delivery priorities for playing pitches and built sport facilities within Westminster and therefore should direct the objectives of the City Plan. The Council does not appear to have a specific Built Facility Strategy or Playing Pitch Strategy that would provide a robust evidence base for any emerging policies. In lack of this, this consultee would likely object to such City Plan policies¹⁷⁴. 	<p>The council has commissioned new studies to assess the needs for playing pitches and built facilities, which will support the delivery of the planning policies of the City Plan.</p>
<p>Comment</p> <ul style="list-style-type: none"> • The occupiers of new developments, especially residential, will generate additional demand for sporting provision which the current offer might not be able to accommodate. The City 	<p>The council will review its infrastructure needs through the Infrastructure Delivery Plan and will set out a strategy for meeting</p>

¹⁷¹ Historic England

¹⁷² Knightsbridge Neighbourhood Forum

¹⁷³ Belgravia Society, Royal Borough of Kensington and Chelsea

¹⁷⁴ Sport England

<p>Plan should acknowledge the strain that the new housing could cause on existing community facilities and new developments should contribute towards meeting the demand they generate through on-site provision of facilities or additional capacity off-site¹⁷⁵.</p> <ul style="list-style-type: none"> Active design principles should inform and be reflected in the City Plan objectives and policies. Active Design is especially relevant given the considerable number of new homes that are required in the area and the Council's specified intention to review Policy S29 that seeks to maximise opportunities to improve health and well-being including healthier lifestyle choices¹⁷⁶. 	<p>this need. The City Plan supports the principles of active design and healthier lifestyle choices.</p>
<p>Support with qualification</p> <ul style="list-style-type: none"> One consultee suggests that where new development is proposed, amenity tests should not be applied strictly to the detriment of the efficient use of land, as this would waste capacity¹⁷⁷. 	<p>The council has prepared a viability assessment to make sure the policies in the revised City Plan do not restrict or discourage development in the city. This makes sure that policies to maintain and enhance the amenity and liveability of the city are justified.</p>
<p>Support</p> <ul style="list-style-type: none"> The review of this policy encountered the support of a number of consultees¹⁷⁸. Policies which support and encourage healthcare improvements within the City are also supported in principle¹⁷⁹. 	<p>Support has been noted.</p>
<p>14. A review of policy S34 Social and Community infrastructure</p>	
<p>Comment</p> <ul style="list-style-type: none"> Development plan policies in respect of community uses within Westminster are onerous and could unnecessarily delay, frustrate, or prevent development that could otherwise 	<p>The revised approach to social and community uses in the City Plan seeks to protect the key uses that help build sustainable communities, while under certain circumstances allowing the loss or re-provision of facilities. This approach can be applied to a range of</p>

¹⁷⁵ Sport England

¹⁷⁶ Sport England

¹⁷⁷ Westminster Property Association

¹⁷⁸ Belgravia Society, Knightsbridge Neighbourhood Forum, Westminster Property Association

¹⁷⁹ Imperial College NHS Healthcare Trust

<p>generate significant economic, environmental and social benefits for the City¹⁸⁰.</p> <ul style="list-style-type: none"> • The review should consider whether protection of social and community uses on large development sites is appropriate¹⁸¹. In the context of this policy review, consultees¹⁸² also requested consideration of whether it is appropriate to protect private social and community uses, as defined within the Glossary of the City Plan. • The current requirement for there to be "no demand for an alternative social and community use" should be removed from this policy so as not reduce asset value which helps generate significant funds which ultimately assist in the provision of more, high quality social and community space in the City. This policy test means that efforts to unlock the regeneration of key sites are frustrated and often subject to lengthy delays, with every prospect that investment proposals are undermined by a policy requirement to yield space to a generic 'community use' (including private operators) at rates considerably below market levels. This renders public service providers unable to manage their estate effectively and in the public interest¹⁸³. It is suggested that the focus should rather be on the quality of re-provision¹⁸⁴. • Any relevant community use policy should be drafted to reflect the current London Plan policy (Paragraphs 3.87A and 3.94A in particular) and Central Government advice. A more proportionate approach would allow for the future safeguarding of community use provision across the City, London, and the UK whilst providing a permissive framework 	<p>sites across the city. The council will encourage the provision of new social and community facilities on large sites. Certain private social and community facilities are protected in the revised City Plan. The council will work with its partners to explore new ways of delivering facilities, including through co-location, to make most effective use of public land and provide high quality services.</p> <p>Westminster's Community Infrastructure Levy will together with section 106 money and other funding streams help to fund new infrastructure including social and community uses, as set out in the Infrastructure Delivery Plan.</p>
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¹⁸⁰ NHS Property Services

¹⁸¹ Westminster Property Association

¹⁸² Church Commissioners for England, Westminster Property Association

¹⁸³ NHS Property Services, King's College London

¹⁸⁴ King's College London

<p>in which necessary and justified changes of use away from a community use are achievable¹⁸⁵.</p> <ul style="list-style-type: none"> The loss of social and community facilities is a concern to many existing residents. An appropriate balance needs to be struck between delivering new housing and providing community infrastructure¹⁸⁶. 	
<p>Support with qualification</p> <ul style="list-style-type: none"> This review has received support from a number of consultees¹⁸⁷, however it has been requested that the Council considers how this policy could be made more flexible to suit a range of circumstances¹⁸⁸. 	<p>Support has been noted. The approach in the revised City Plan provides more flexibility with regards to the protection of existing social and community facilities, and the loss of existing facilities will only be accepted when certain criteria have been met.</p>
<p>15. A review of all transport policies including removal of references in policy S41 'Pedestrian Movement and Sustainable Transport'</p>	
<p>Objection</p> <ul style="list-style-type: none"> This proposed change in policy wording has encountered the greatest number of objections from both public sector consultees and from the general public¹⁸⁹. 	<p>All objections have been noted. The council will work with its partners to determine how issues can be addressed through the revised City Plan.</p> <p>The new City Plan has introduced an individual policy for Walking and Cycling which adds more detail on how measures promoting these modes can be safely and successfully achieved. It also recognises that a successful sustainable transport strategy necessitates a holistic approach to transport which forges and acknowledges the interdependencies between the different transport modes.</p> <p>The policies within the City Plan's Connections chapter also strengthen the relationship between public realm improvements and the promotion of sustainable transport modes which can be aided and facilitated by the delivery of new developments.</p>

¹⁸⁵ NHS Property Services

¹⁸⁶ Knightsbridge Neighbourhood Forum

¹⁸⁷ King's College London, Westminster Property Association

¹⁸⁸ King's College London, NHS Property Services

¹⁸⁹ Clean Air London, Westminster Cycling Campaign, James Broughton, Rich Clarke, Barny Evans, Daniel Jaeggi, Alexander Jenkins, Alan Lee

<p>Comment/Concern</p> <ul style="list-style-type: none"> Westminster is urged to review City Plan's transport policies with reference to the Mayor's Transport Strategy and draft new policies to take account of the need to reduce car use in Westminster¹⁹⁰. Support to the full programme of transport projects set out in the draft MTS and the London Plan should be given, including safeguarding land for proposed transport improvements and protecting existing transport infrastructure¹⁹¹ 	<p>The council acknowledges and welcomes the new draft Mayor's Transport Strategy and will strive to achieve its targets, especially in a place like Westminster where a dense urban fabric and a high degree of public transport accessibility can support the use of sustainable modes of transport and provide opportunities for active travel.</p>
<p>Comment</p> <ul style="list-style-type: none"> Reducing the reliance on private motor vehicles and encouraging sustainable forms of transport are seen as key priorities¹⁹², particularly given the dense nature of the City¹⁹³ and the fact that private motor vehicles represent a very small proportion of journeys in the City¹⁹⁴. Consultees advocate for policies that seek to reduce the dominance of motor vehicles and traffic in Westminster, as a means to tackling their negative social, economic and environmental impacts. A number of local stakeholders have worked on or are currently delivering strategies and public realm schemes that seek to promote people movement as a priority against the dominance of traffic movement¹⁹⁵. In relating to other aims of this City Plan revision, such as that of improving air quality in the City and contributing to the health and wellbeing of its population¹⁹⁶, Westminster should be actively 	<p>The council is looking at achieving a simpler and cleaner traffic flow to help reduce the pollution linked with local vehicular traffic. Westminster is at the forefront of measures that are seeking to reduce pollution linked with vehicular traffic, for instance through the Marylebone Low Emission Neighbourhood and the #DontBeldle campaign. The planning policies in the City Plan will seek to further contribute to cleaner air and enhanced use of active travel modes.</p> <p>The draft City Plan supports the improvement of the public realm and of schemes which include the improvement and development of facilities that support and encourage active travel in Westminster. The draft City Plan policies prioritise walking and active travel to help accommodate the growing number of people living, working and visiting Westminster. The council has published a Walking Strategy (2017-2027) which aims to achieve the highest amount of walking in</p>

¹⁹⁰ Mayor of London

¹⁹¹ Transport for London

¹⁹² Belgravia Society, Heart of London, Knightsbridge Residents Association, Shaftesbury, The Westminster BIDs, Transport for London, James Broughton, Rich Clarke, Barny Evans, Alexander Jenkins, Alan Lee

¹⁹³ James Broughton

¹⁹⁴ Daniel Jaeggi

¹⁹⁵ The Westminster BIDs

¹⁹⁶ James Broughton

trying to impede some motor vehicle movements to support a shift in favour of active travel and public transport¹⁹⁷. The likely increase in private hire vehicles and taxi use as well as delivery vehicles should also be addressed with policies to reduce their impact¹⁹⁸. Discouraging private motor vehicles is also relevant in today's climate where vehicles are used in terrorist attacks¹⁹⁹.

- Walking must always be the top priority and come above other modes of transport such as cycling and buses if the council is to meet its aspiration to create a walkable city. The walking strategy that was consulted on in 2016 should be referenced in the revised City Plan and a policy dedicated to walking should be considered²⁰⁰.
- There is continued support to the existing policy goals of S41, encouraging pedestrian movement and an enhanced public realm²⁰¹. Supportive comments have been received in relation to the requirement for contributions towards improving the public realm and the "creation of a convenient, attractive and safe pedestrian environment, which particular emphasis in areas with high pedestrian volumes or peaks (Policy S41)²⁰².
- The new City Plan should reflect the strategic priority given to Health Streets in the Mayor's Transport Strategy including support for walking, cycling and public transport as well as more efficient use of streets through reducing car use²⁰³.

any London borough by increasing the number of walking trips by residents from 84% to 92% of all potentially walkable trips. This supports the Healthy streets objectives; a concept also been incorporated into City Plan policy.

The draft City Plan supports the relocation of Victoria Coach Station to a more appropriate location, which may be outside of Westminster, where it can better meet coach travel demands and have a reduced impact on residential amenity. The current coach station has exceeded the levels of capacity it was originally designed for and the council will co-operate with all stakeholders to ensure a new location is agreed and a new Coach Station delivered as a matter of urgency.

There is support to implementing car club and sharing schemes throughout Westminster where this contributes to the reduction of parking stress and to trips by private motor vehicles. The council also supports the continued roll out of on-street electric charging points across Westminster and requires the provision of electric vehicle charging points for developments with off-street parking provision and for new car parking for public use.

The council will support Crossrail 2 through the City Plan and will seek to safeguard land to facilitate the delivery of this project.

The City Plan will set out the council's requirements for cycle parking.

¹⁹⁷ Alexander Jenkins

¹⁹⁸ Barny Evans

¹⁹⁹ Daniel Jaeggi

²⁰⁰ Victoria BID

²⁰¹ Heart of London, Shaftesbury

²⁰² Heart of London, Shaftesbury

²⁰³ Transport for London

- Victoria Coach Station represents a major problem for Belgravia as it is a major source of air pollution and should be closed and relocated in the periphery of London²⁰⁴.
- There is still a need for both car and coach drop off points in the West End, and support for more detailed work to plan for coach parking, as this can lead to significant congestion. The location of visitor cycle parking requires better planning as cycle racks are not always positioned in areas of high demand. Electric vehicle charging points should be more accessible and kept in good condition and there should be further encouragement of the use of car clubs²⁰⁵.
- The Council should commit to work with TfL to find replacement coach facilities when parts of Victoria Coach Station are required as a Crossrail 2 works site²⁰⁶.
- It is unclear whether this is in response to the Government's plan to tackle air pollution, which recommends local authorities improve traffic flow as one measure to reduce pollution. The government's air pollution plan is being taken back to court because it contains precisely these ineffective measures²⁰⁷.
- The wider impact of the Elizabeth Line and ultimately Crossrail 2 beyond purely Oxford Street and the station 'hubs' need to be planned for²⁰⁸. Strong support should be given to Crossrail 2²⁰⁹.
- In Appendix 1, the proposed location of Crossrail 2 should be referenced in Table B as a strategic site within the Victoria Opportunity Area. Lower Grosvenor Gardens should be removed from Table H as it is our understanding that Lower

Deterring vehicles and the setting of parking charges are beyond the remit of the City Plan. The council will work with its partners, including the GLA, to tighten the standards of vehicles entering Central London, such as through the Mayor's Ultra-Low Emission Zone leading to a fall in NOx emissions by an additional 20 percent in 2019.

The council has reviewed its approach to car parking in the City Plan, seeking to balance the objective to reduce vehicle movements with responding to the needs of residents and demands on kerb-side space for parking. The new policy acknowledges the requirements of London Plan parking policy whilst responding to the specific localised requirements unique to Westminster. As a result on site car parking under specific requirements is permitted in parking zones B and F where kerb side stress is at its most acute.

The City Plan contains a specific policy to enhance and protect the different functions of its waterways, including the Thames and Westminster's canals.

The council recognises the importance of station enhancements in responding to growing populations and use of public transport and the City Plan will support and encourage increases in capacity at mainline stations. The council will consider the approach to planning contributions for station enhancements.

The City Plan addresses the potential need to produce travel plans in the City Plan in order to cater for the proper consideration of a

²⁰⁴ Belgravia Society

²⁰⁵ Belgravia Society, Heart of London

²⁰⁶ Transport for London

²⁰⁷ James Broughton

²⁰⁸ Shaftesbury

²⁰⁹ Transport for London

<p>Grosvenor Gardens has been removed from the work site plans²¹⁰.</p> <ul style="list-style-type: none"> • Terminus place should be referenced as a distinct site from that of Victoria Station in Policy S43 and a statement on the role the Council intends to play in upgrading this transport and public realm hub should be provided²¹¹. • There needs to be a more pragmatic application of cycle parking standards, particularly when converting existing buildings in the West End²¹² • Entrance to vehicles not owned by local residents should be deterred either through measures such increased charges for vehicles entering Westminster or increased parking charges²¹³. • A number of consultees²¹⁴ consider that the requirement for off-street residential car parking in new residential developments, especially affordable developments, should be reviewed, particularly within the CAZ, given the significant challenge of accommodating off-street parking on small residential developments. The view is that off-street car parking for affordable developments will generally be underused, with occupiers relying upon cycles, shared car services and public transport²¹⁵. • One consultee²¹⁶ has more explicitly suggested the promotion of car-free housing schemes is considered. • Local policy should recognise the canal network as a specific form of infrastructure. Enhancing the Grand Union Canal and 	<p>proposal's transport impact. On this basis applicants are urged in terms of major developments to engage with Westminster's established pre-application process at the earliest possible stage of the development cycle.</p> <p>Improvements to the local transport infrastructure are addressed in policies such as the Public Transport and Infrastructure policy. The Sustainable Transport policy sets a strategic overview for required transport infrastructure improvement and makes it clear that a suite of transport measures will be needed to create an interconnected network which responds to the changing nature of movement in, around and through the city.</p>
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²¹⁰ Victoria BID

²¹¹ Victoria BID

²¹² Shaftesbury

²¹³ Belgravia Society

²¹⁴ Church Commissioners for England, Westminster Property Association

²¹⁵ Westminster Property Association

²¹⁶ Shaftesbury

encouraging walking and cycling along its towpaths can contribute to sustainable local transport²¹⁷.

- The Council should positively support and make provision for increased use of the Thames for both transport and freight²¹⁸.
- The document should make it clear that investment in transport infrastructure is inextricably linked to unlocking new growth opportunities in Westminster. The plan should acknowledge the vital role played by Network Rail in increasing the capacity of London's railway and, particularly, redeveloping many of its major stations to meet the needs of a growing population. A specific commitment to support the comprehensive redevelopment of Westminster's stations should be included in the plan, as well as an acknowledgement that financial support through the planning charges regime and commercial development is required to facilitate these station improvements²¹⁹.
- A flexible approach should be adopted when considering the development of railway land and assets, to recognise the constraints they possess²²⁰.
- The council should set out key approaches to help minimise and mitigate the impacts of development, including car parking, freight transport and minimum requirements for cycle parking. Travel Plans should be required for large-scale developments, especially for non-residential uses, with funding secured for monitoring and implementation of active travel promotion measures. A robust assessment of transport impacts should be carried out in accordance with TfL guidance together with mitigation where necessary²²¹.

²¹⁷ Canal and River Trust

²¹⁸ Transport for London

²¹⁹ Network Rail

²²⁰ Network Rail

²²¹ Transport for London

<ul style="list-style-type: none"> The council should positively support and make provision for essential London Buses infrastructure, as well as making provision for Taxis, in particular the creation of new Taxi ranks, at early stages of the development management process²²². 	
<p>Support</p> <ul style="list-style-type: none"> A review is needed²²³. 	Support is noted.
16. Specifying which principles and parts of the plan should be taken into account in the preparation of neighbourhood plans	
<p>Objection</p> <ul style="list-style-type: none"> The Localism Act 2011 provides the regulation for Neighbourhood Forums and the Council should not try to interpret what a forum may or may not do²²⁴. A material increase in the number and scale of such policies is not supported²²⁵. Strategic policy should deal with purely strategic issues and some scope should be allowed for local non-strategic policies to be brought forward through neighbourhood plans²²⁶. 	Comments have been noted. The council will fully respect and follow the relevant regulations regarding Neighbourhood Planning. These require Neighbourhood Plans to be in general conformity with the strategic policies of the development plan. The City Plan therefore provides more clarity for neighbourhood forums and groups, by indicating clearly in the City Plan which policies are of strategic nature.
<p>Comment</p> <ul style="list-style-type: none"> The expectations of the various neighbourhood forums will need careful management²²⁷. When there is conflict between local (non-strategic) policies and a neighbourhood plan policy, then the neighbourhood policy will apply²²⁸. 'Box-ticking' consultation is inadequate and represents a missed opportunity. Meaningful engagement must be carried out throughout the whole process of revising the City Plan, also so that those neighbourhood plans which have already 	<p>Comments have been noted. The council is fully aware of the planning status of Neighbourhood Plans and is working closely with neighbourhood forums in the city to facilitate the preparation of their Neighbourhood Plans.</p> <p>The council is committed to consult extensively with local stakeholders not only through formal consultation, but also through engagement through existing communication and partnership channels.</p>

²²² Transport for London

²²³ Westminster Cycling Campaign

²²⁴ Belgravia Society

²²⁵ Pimlico Neighbourhood Forum

²²⁶ Marylebone Forum and Marylebone Association, Pimlico Neighbourhood Forum

²²⁷ Shaftesbury

²²⁸ Knightsbridge Neighbourhood Forum

<p>been prepared are not undermined by the new City Plan²²⁹, for example in regards to possible changes to the CAZ.</p>	
<p>Support with qualification</p> <ul style="list-style-type: none"> • Generally supported. However not all neighbourhood forums and associations are convinced there is a willingness on the side of the Council to give substantial scope to Neighbourhood Plans. If the Council does not see neighbourhood plans adding any material value in working alongside the new local plan, this should be clearly stated²³⁰. 	<p>Support noted. The council is supportive of neighbourhood planning and will consider the policies of any made neighbourhood plans in the determination of planning applications as per legislation and regulations.</p>
<p>Support</p> <ul style="list-style-type: none"> • This specification is welcome as it is important to provide greater certainty for neighbourhood forums and stakeholders in preparing and revising neighbourhood plans²³¹. It may also be helpful to set out the role and status of neighbourhood plans and show the neighbourhood areas that have been established and any plans that have been made²³². 	<p>Support has been noted. Information regarding the status of neighbourhood plans is ever evolving and can be found on the council's website.</p>

²²⁹ Knightsbridge Neighbourhood Forum

²³⁰ Marylebone Forum and Marylebone Association

²³¹ Knightsbridge Neighbourhood Forum, Defence Infrastructure Organisations, Royal Borough of Kensington and Chelsea, TfL Commercial Development Planning Team

²³² Royal Borough of Kensington and Chelsea

Additional comments received during Regulation 18 consultation

Figure 6 - Additional comments (Regulation 18 consultation)

Summary of key issues raised	Council's response
<p>17. Sustainable Development</p> <p>Comment</p> <ul style="list-style-type: none"> The Sustainable Development Goals of the UN 2030 Agenda for Sustainable Development should be incorporated in the new City Plan²³³. 	<p>The City Plan incorporates generic growth principles as part of its spatial strategy, where sustainability plays an important role. The City Plan is subject to an Integrated Impact Assessment which assesses and seeks to optimise the sustainability of the plan. The SDGs will be referenced in the IIA report under relevant plans and programmes.</p>
<p>18. Flood Risk</p> <p>Comment/Concern</p> <ul style="list-style-type: none"> Westminster's draft policies on flood risk do not currently endorse the recommendations from the TE2100 Plan. Westminster faces onto the Thames, is at risk of tidal flooding (particularly residual risk from a breach of defences) and the Thames river wall is a key defence feature for the borough. With Westminster lying within the London City Policy Unit (Action Zone 2) of the TE2100 Plan, further action is required to reduce flood risk beyond that required to keep pace with climate change acknowledging that defences will need to be raised in the future. During the first 25 years (to 2034) defences need to be maintained, enhanced or replaced and in the longer term to the end of the century defences will need to be raised up to 1 metre. Flood defence raising provides the opportunity to enhance the Thames frontage, for example, setting back defences into the urban landscape and integrating flood defence raising into developments. Flood defence raising will require safeguarding of land adjacent to the Thames to allow the defence raising to take place sensitively and in consideration 	<p>Westminster is actively engaging with the TE2100 team, other boroughs and agencies to look at a range of measures to address flood risk. The council has taken account of the TE2100 plan in drafting the policies of the City Plan.</p>

²³³ Knightsbridge Neighbourhood Forum

<p>of the other planning requirements such as amenity, landscape, recreation and biodiversity. The revision of Westminster's policies provides an opportunity to set out a clear strategy for achieving flood defence raising which also meets other important requirements, and to make clear what the expectations are for those who propose developments adjacent to the River Thames²³⁴.</p>	
<p>Comment</p> <ul style="list-style-type: none"> • It is recommended that the Council update the existing Strategic Flood Risk Assessment (SFRA) based on the most recent flood modelling available and relevant policy updates²³⁵. • If the Council is proposing to include in the City Plan update a review of the existing strategic sites or propose additional strategic sites to make provision up to 2035, this would require revising the current Sequential Test or applying the Sequential Test afresh in line with paragraphs 100-103 of the NPPF based on an up-to-date SFRA, and that all forms of flood risk should be considered when applying the test. If it is not possible to allocate all the Council's sites in areas of lowest flood risk, the Exceptions Test is required supported by a Level 2 SFRA or a site-specific FRA²³⁶. • The Council is encouraged to maintain the Council's current policy S30 'Flood Risk' (and associated paragraph 5.27) and update it where necessary based on an updated SFRA²³⁷. • The link between flood risk and climate change is often not made in flood risk policies, and a stronger reference to the need to design in flood risk mitigation taking account of climate change is recommended²³⁸. 	<p>The council has recently published its updated Local Flood Risk Management Strategy 2017-2022 which forms part of the evidence base for informing strategic policies for flooding in the new City Plan. The updated Local Flood Risk Management Strategy makes a strong reference to the link between flood risk and climate change, and this will be reflected in the City Plan. The council has prepared an update of the SFRA to support the City Plan.</p> <p>New City Plan policies maintain the aims of the council's current policy S30 'Flood Risk' and have been informed by the consultation responses to the 2014 'Flood Risk Policy' Booklet.</p>

²³⁴ Environment Agency

²³⁵ Environment Agency

²³⁶ Environment Agency

²³⁷ Environment Agency

²³⁸ Environment Agency

<ul style="list-style-type: none"> Advice previously provided in response to the 2014 'Flood Risk Policy Booklet' and 'Open Space and Green Infrastructure' consultations has been attached²³⁹. 	
19. Water quality and waste water infrastructure	
<p>Comment/Concern</p> <ul style="list-style-type: none"> There is little mention to water supply and waste water linked with water quality within the plan, although there is support for the implementation of the Thames Tunnel Project which will help reduce combined sewer discharges into the Thames. The NPPF lists water quality and the provision for wastewater as one of the strategic priorities that should be considered in Local Plans (NPPF paragraph 156). Local Authorities should work with providers to assess the quality and capacity of infrastructure for water supply, wastewater and its treatment (NPPF paragraph 162). London Plan Policy 5.14 sets out that Local Authorities should <i>“protect and improve water quality having regard to the Thames River Basin Management Plan”</i>²⁴⁰. It is recommended that the Council works collaboratively with other bodies across local authority boundaries to address water quality to ensure that strategic priorities are properly coordinated and reflected in individual Local Plans (NPPF paragraphs 178 and 179). A catchment-based approach is advised as it can alleviate costs, resources and help identify strategic solutions to any problem identified²⁴¹. It is recommended the Council liaise with Thames Water to ascertain whether there is enough capacity in the existing sewage network and wastewater treatment works to serve future growth. Any assessment of infrastructure requirements 	<p>The draft City Plan policies seeks to protect and enhance water quality and request that proposals affecting Westminster's waterways and waterbodies incorporate measures to improve surface and ground water quality.</p> <p>The council will work collaboratively with Thames Water and other bodies across borough boundaries to address water quality and the provision for wastewater having regard to the Thames River Basin Management Plan 2015.</p>

²³⁹ Environment Agency

²⁴⁰ Environment Agency

²⁴¹ Environment Agency

<p>should be evidenced, and the recommendations inform the revisions of the City Plan²⁴².</p>	
20. Water Resources	
<p>Comment</p> <ul style="list-style-type: none"> • The Mayor of London updated Policy 5.15 in line with the new Building Regulations to adopt a London-wide approach to water efficiency savings for residential development. If you are supportive of this, it could be referenced in your revised City Plan²⁴³. • Non-households make a significant contribution towards water consumption (29%) and therefore this is where further water and carbon savings can be made. Given the city's location within Thames Water's London Water Resource Zone (classified as 'seriously water stressed') there is evidence to support and we urge you to consider whether a water efficiency standard for non-residential developments could be included as part of your revision²⁴⁴. • The standard we recommend is BREEAM 'Excellent' with maximum number of 'water credits.' We emphasise 'maximum water credits' because the BREEAM standard can be achieved without the water efficiency measures which are so needed in London (e.g. low flush toilets, water metering, leak detection systems and water butts, etc). The alternative is that buildings meet 'best practice' level of the Association for Environment Conscious Buildings (AECB, Water Standards)²⁴⁵. 	<p>The London Plan is part of Westminster's development plan. As Westminster is an area of Serious Water Stress, the City Plan sets out the requirement to meet the Building Regulation G2 optional requirement for water efficiency.</p>
21. Climate Change	
<p>Comment</p> <ul style="list-style-type: none"> • There is a need for 'zero air emission' buildings including major refurbishments²⁴⁶. Also, although the reduction of 	<p>The council supports more energy efficient buildings, bearing in mind the specific nature of heritage buildings, which may preclude some of</p>

²⁴² Environment Agency

²⁴³ Environment Agency

²⁴⁴ Environment Agency

²⁴⁵ Environment Agency

²⁴⁶ Clean Air in London

<p>carbon emissions through energy efficient buildings, on-site renewables, decentralised heating, cooling and energy, are all important in reducing the impacts of climate change, the focus should be broader and consider other ways in which sustainable development can mitigate and adapt to climate change in the city. The reduction of carbon emissions in the context of new developments can be achieved with an array of measures, including through the provision of green infrastructure and improved resilience to flood risk²⁴⁷.</p>	<p>this. The City Plan contains policies that recognise that climate change adaptation must be achieved through a range of measures, and sets out clear policies for development to contribute to this.</p>
<p>22. Biodiversity and the River Thames</p>	
<p>Comment</p> <ul style="list-style-type: none"> • It is recommended that when revising policies S37 'Westminster's Blue Ribbon Network' and S38 'Biodiversity and Green Infrastructure' a clear strategy for how the waterbodies will be protected and enhanced in line with the Thames River Basin Management Plan (2015) is included²⁴⁸. • The requirement for appropriate setback of development from the River Thames should provide a green corridor where possible, which would also help to achieve requirements for TE2100 and recreation/amenity²⁴⁹. • There should be a closer link between Policy 37 and 38 so that the benefits for development and biodiversity enhancements are understood²⁵⁰. • There is no mention of Invasive Non-Native Species (INNS) in the policy, while there are many records of INNS species in Westminster. We need to advise developers that such plants should be surveyed for, monitored and if possible, eradicated to prevent future spread²⁵¹. 	<p>The City Plan includes reference to the Thames River Basin Management Plan in the revised waterways policy.</p> <p>Comments have been noted. The council will review how developments can respond well to rivers - the biodiversity benefits of waterways is recognised in the City Plan.</p> <p>Comment regarding non-native species has been noted and will be considered as part of the preparation of a Supplementary Planning Document to aid the application of the City Plan.</p>
<p>23. Air Quality</p>	

²⁴⁷ Environment Agency

²⁴⁸ Environment Agency

²⁴⁹ Environment Agency

²⁵⁰ Environment Agency

²⁵¹ Environment Agency

<p>Comment/Concern</p> <ul style="list-style-type: none"> • Air quality appears to be given less weighting than climate change in the current plan. Given its direct, near-term and quantifiable impacts on health, air quality should also be referenced as a risk issue²⁵². There should be a policy cross reference to Westminster's Air Quality Action Plan which specifies policies to reduce emissions and improve air quality in the borough²⁵³. This policy should also link in and refer to the London Mayor's initiatives and measures on air pollution, especially those on development planning and road transport²⁵⁴. • The current plan makes no reference to the Short-Term Operating Reserve programme. All developments in London should be banned from signing up to initiatives where developments with backup generators are paid to turn their generators on and feed the grid at periods of high demand; this is because turning diesel generators outside the times required as part of an annual test cycle stands to worsen poor air quality. Similarly, developments wanting to test their diesel generators should only be permitted to do so on days where the air pollution levels are deemed 'low' by the London Air Quality Network. Generators tested during moderate or high pollution episodes will exacerbate poor air quality²⁵⁵. • Combined Heat and Power (CPH) facilities reduce greenhouse gas emissions but increase local NOx and other pollutant emissions. One consultee encourages the Council to examine its stance on CPH²⁵⁶. 	<p>The council recognises that air quality is a major challenge for the city and welcomes future technologies to improve air quality in Westminster. The City Plan relates to the council's Air Quality Action Plan, which will include specific actions to improve air quality in the city.</p> <p>Whilst the council recognises and supports a range of measures to improve air quality, it is beyond the remit of the City Plan to reference these detailed projects and programmes.</p> <p>The council is supportive of a combined heat and power facility connected to the Pimlico District Heating Undertaking.</p>
<p>Comment</p>	

²⁵² Victoria BID

²⁵³ Belgravia Society, Environment Agency, Knightsbridge Neighbourhood Forum

²⁵⁴ Environment Agency

²⁵⁵ Victoria BID

²⁵⁶ Victoria BID

<ul style="list-style-type: none"> Given the increasing need for more and more rapid electric vehicle chargers, also in view of the imminent launch of new electric taxis in London, consultees would like to see a position on rapid chargers referred to in the new City Plan²⁵⁷. 	<p>Although the City Plan encourages the roll out of on-street electric vehicle charging points across the city, it is outside of its remit to specify the types of chargers used as technology advances fast and the policy would soon be out of date.</p>
<p>Support with qualification</p> <ul style="list-style-type: none"> Some aspects of Policy S31 are not very specific. We would like to see what measures will be required to reduce emissions²⁵⁸. 	<p>The council will prepare a separate Air Quality Action Plan, which will specify a range of measures across different sectors to reduce emissions and improve air quality.</p>
<p>24. Noise/Light/Air pollution</p>	
<p>Comment</p> <ul style="list-style-type: none"> The section on the River Thames should include policy provision to measure and moderate noise pollution in accordance with the Environmental Protection Act. The Thames Bank Area of Pimlico should be designated a Special Policy Area with steps to mitigate the noise, air and light pollution²⁵⁹. Permitted hours for noisy working should be reviewed, as should the way in which noise is judged²⁶⁰. 	<p>The City Plan policy seeks to minimise noise, including around open spaces and in residential areas. The council will review its noise reduction standards and requirements in the City Plan review, to make sure it is up-to-date.</p>
<p>25. Smoking ban</p>	
<p>Comment</p> <ul style="list-style-type: none"> Smoking should be banned from public establishment external seating areas, or separate smoking areas should be provided²⁶¹. 	<p>Banning smoking from public establishments is outside of the remit of the City Plan. However, the City Plan contains policies to manage shisha smoking in the city.</p>
<p>26. Waste Management</p>	
<p>Comment</p> <ul style="list-style-type: none"> With regards to policy S44 'Sustainable Waste Management,' as part of the requirement for the duty to cooperate, there should be engagement with other boroughs in regards to seeking to share waste apportionments and identifying which 	<p>The council will continue to engage with other London boroughs and other local authorities in effectively dealing with waste management and to develop future waste policies.</p>

²⁵⁷ Victoria BID

²⁵⁸ Environment Agency

²⁵⁹ Colin Baker

²⁶⁰ Belgravia Society

²⁶¹ David Coffey

<p>authorities receives waste from Westminster. This could be achieved through the engagement with the London Waste Planning Forum (previously the London Regional Technical Advice Board), and analysis of waste flows from the borough²⁶².</p>	
<p>Support with qualification</p> <ul style="list-style-type: none"> It is welcome that the Full Revision also intends to cover environmental policies, including waste²⁶³. These policies should demonstrate innovative thinking and use the planning system proactively to minimise the impact of these matters on the environment²⁶⁴. 	<p>Support has been noted.</p>
<p>27. Westminster waterways</p>	
<p>Comment</p> <ul style="list-style-type: none"> The canals and their towpaths provide a haven for wildlife and vegetation, as well as being used as bat 'feeding corridors'. Local policy should require that developments adjacent to the canal respect and enhance the biodiversity of the waterway environment²⁶⁵. Canal water can be used for heating and cooling of canalside developments and can be a more efficient solution than air source pumps. The canals can also sometimes accept surface water drainage from developments, subject to appropriate agreement from the Canal & River Trust²⁶⁶. Local policy should take the opportunity to enhance the canals and access to them to encourage walking and cycling. As well as promoting sustainable local transport, such enhancement can also encourage walking and cycling with a benefit to human health. It is recommended that Local Policy should recognise the canal network as a specific, 	<p>Comments have been noted. The requirement for development affecting waterways to seek to enhance biodiversity and waterside habitats has been incorporated.</p> <p>Comments have been noted. The council will be supportive of appropriate technologies. The use of canals for drainage may be supported if a justified case can be made. Proposals will need to adhere with the policies of the City Plan.</p> <p>The council recognises the multiple functions of canals and sets out policies in the revised City Plan which seek to optimise their use and enjoyment. The partnership with the Canal & River Trust will be recognised in the revised City Plan.</p> <p>Contributions to the enhancement of waterway infrastructure will be sought where this is necessary to make the development acceptable</p>

²⁶² Environment Agency

²⁶³ Royal Borough of Kensington and Chelsea

²⁶⁴ Knightsbridge Neighbourhood Forum

²⁶⁵ Canal and River Trust

²⁶⁶ Canal and River Trust

<p>multifunctional form of infrastructure, and acknowledge the Canal & River Trust as a key partner in this respect²⁶⁷.</p> <ul style="list-style-type: none"> • In order to ensure that any impacts of development on the canal infrastructure are mitigated, for example where developments will result in significant increases in the use of the towpath as a sustainable transport link, it should be clearly stated that appropriate developer contributions towards improving the condition of the towpath or other waterway infrastructure will be sought²⁶⁸. • We would request that the Council encourage potential developers to contact the Trust to seek pre-application advice for any canalside proposals and advise them to consult the Canal and River Trust's Code of Practice for practical advice²⁶⁹. • The canals, basins, towpaths and bridges over them, are all part of the industrial heritage of the City of Westminster. They also include smaller heritage features, such as mileposts, horse rope marks on bridges and iconic wooden lock gates and are free for the community to visit and enjoy. Local policy should recognise these assets and encourage development to protect and enhance the historic character of the canals²⁷⁰. • The canals are also home to a community of boats and moorings, providing residential units, tourism, and successful waterside destinations (such as the Puppet Barge and Floating Boater café in Little Venice). We are keen that local policy supports and encourages this²⁷¹. 	<p>in line with the policies in the revised City Plan. The heritage function of Westminster's canals will be recognised in the City Plan. The council will include a reference to the Canal and River Trust in the City Plan.</p> <p>The council recognises that a range of moored vessels can add to Westminster's diversity and vibrancy. The City Plan contains specific policies to manage moorings to make sure adverse impacts are avoided.</p>
28. Open Spaces	
Comment	

²⁶⁷ Canal and River Trust

²⁶⁸ Canal and River Trust

²⁶⁹ Canal and River Trust

²⁷⁰ Canal and River Trust

²⁷¹ Canal and River Trust

<ul style="list-style-type: none">• Green spaces that are open to the public should gain additional value as they also provide vital amenity space, essential for wellbeing and sustainable development. The new City Plan should give proper recognition and consideration of heritage assets and open spaces and protect not only statutorily and non-statutorily designated assets, but also other local heritage assets. Further support can be given through site specific policies for heritage assets requiring particular investment²⁷².• New public realm of high horticultural interest should be encouraged because of its public amenity value and contribution to the well-being of local residents and new users²⁷³.• Development which benefits from its proximity to a public open space should contribute to its ongoing maintenance²⁷⁴.	<p>Comments have been noted. The heritage policies of the City Plan conserve both designated and non-designated heritage assets.</p> <p>Public realm policies in the City Plan highlight the importance of high quality of hard as well as soft landscaping in public realm schemes. The council's new Open Spaces & Biodiversity Partnership strategy recognises the great impact of access to places of horticultural interest and value in biodiversity terms on the wellbeing of individuals and the community as a whole.</p> <p>The council will work with its partners including BIDs to ensure the public realm including open space is maintained.</p>
29. Food growth	
<p>Comment</p> <ul style="list-style-type: none">• Food is a planning issue. A healthy, varied and affordable food offer can be achieved through planning policies that protect retail diversity, promote food markets in retail centres and temporary market stalls close to community facilities, address food deserts and actively discourage the location of hot food takeaways close to community facilities used by children, young people and families²⁷⁵.• Existing community food growing spaces should be protected, and new food growing spaces encouraged in or near existing housing estates. Their provision should be sought in discussion with developers, and the temporary use of vacant sites and land awaiting development should also be encouraged.	<p>The council recognises the importance of access to healthy food, including its food growing programme. Street markets will continue to be supported. The council recognises that managing access to hot food takeaways can play a role in preventing negative health impacts. However, as the density of the city is unique a blanket approach to hot food takeaways would not be practical. The council City Plan therefore sets out its own approach to manage the over-concentration of hot food takeaways but introducing a 200m buffer around schools.</p> <p>The City Plan sets out a positive strategy to protect and enhance the green infrastructure, and space for food growing can contribute to this. Food growing may not be appropriate across the whole of Westminster. We will consider this issue further in the preparation of</p>

²⁷² London Parks and Garden Trust

²⁷³ London Parks and Garden Trust

²⁷⁴ London Parks and Garden Trust

²⁷⁵ Capital Growth

<ul style="list-style-type: none"> Food growing space should be required in all new major residential developments through Section 106 agreements. Productive trees and edible plants should be integrated in the design of open space in new developments, which should also be flexible so as to accommodating growing opportunities in the future²⁷⁶. 	<p>a Supplementary Planning Document to help application of the City Plan.</p>
30. Protection for non-A1 retail uses	
<p>Comment</p> <ul style="list-style-type: none"> Sui generis uses are not protected by policies to protect employment uses within emerging development plans. In particular, since Policy S22 (2007 UDP) was deleted in 2010, builders merchants have not received specific protection. Employment-generating sui generis uses, such as builders merchants, should be protected and encouraged in City Plan policies. There should be a consideration over including builders merchants and other commercial services, which are essential to local businesses and tradespeople, within mixed use redevelopments with residential units. This can improve land values, retain and enhance industrial floorspace through redevelopment and also contribute to helping boroughs meet their housing targets, whilst retaining important local jobs²⁷⁷. 	<p>Comments have been noted. The City Plan is restricted in the protection it can offer <i>sui generis</i> uses by the use classes order. The plan will offer support for the development of new, and encourage the retention of existing, sui generis uses where they are deemed to contribute to the local area and are appropriate.</p>
31. Safeguarding and promoting culture activities and venues	
<p>Comment</p> <ul style="list-style-type: none"> Policy S22 in the Westminster City Plan 2016, which recognises the cultural and economic role of London's West End theatres should be retained²⁷⁸. 	<p>Support for this policy has been noted. The revised City Plan adopts the principles of this policy and expand it to reflect the current vision and strategy of the plan.</p>
32. Community Infrastructure Levy (CIL)	
<p>Comment</p> <ul style="list-style-type: none"> Some concerns have been raised in regards to the Council's proposed 'governance' arrangements for the spending of the 	<p>Comments have been noted. Although the CIL is outside of the remit of the City Plan, the council will keep its approach to CIL under</p>

²⁷⁶ Capital Growth

²⁷⁷ Travis Perkins

²⁷⁸ The Theatres Trust

<p>Knightsbridge neighbourhood portion of monies raised through CIL, and alternative preferred approaches are being put forward²⁷⁹.</p> <ul style="list-style-type: none"> It would be welcome that the Council considered whether there may be instances where CIL monies and developer contributions could serve to enhance healthcare provision²⁸⁰. 	<p>review which includes working with partners and neighbourhood forums to identify projects which developer contributions could contribute to.</p>
33. Pedestrian and cycle bridge	
<p>Comment</p> <ul style="list-style-type: none"> The new pedestrian and cycle bridge across the river Thames between Vauxhall Bridge and Grosvenor Bridge should be included in Westminster's City Council's planning policy agenda and recognised in the emerging Local Plan²⁸¹. 	<p>As a matter of principle, we do not favour proposals for new river crossings in Westminster. However, the council will continue to engage with partners on any potential river crossing. The City Plan sets out the council's policies to address any potential adverse effects of new river crossings, and to make sure that location and design are appropriate to its location.</p>
34. Process	
<p>Objection</p> <ul style="list-style-type: none"> This level of detail is inappropriate at this stage and can only prejudice the outcome of the review²⁸². 	<p>The Regulation 18 consultation was in line with the regulations and follows on previous consultations on specific policy areas including topic-based booklets. The consultation was of appropriate level of detail and we will consider all representations made during this consultation in the preparation of the revised City Plan.</p>
35. Glossary update	
<p>Comment</p> <ul style="list-style-type: none"> The definition of Gross Floorspace within the Glossary of the UDP should be changed, so that it is based on Gross Internal Area (GIA) rather than Gross External Area (GEA). This would align with the NPPF and the basis for assessing CIL. The suggestion is that the definition could be based upon the RICS Code of Measuring Practice, subject to continuing to 	<p>The council already use GIA as a method of calculating floorspace (following changes to the NPPG, the introduction of Westminster's CIL in 2016 and the revised mixed-use policy in the City Plan in 2016). The revised City Plan clarifies this approach.</p>

²⁷⁹ Knightsbridge Neighbourhood Forum

²⁸⁰ NHS Property Services

²⁸¹ Wandsworth Council

²⁸² Alexander Jenkins, Westminster Cycling Campaign

<p>exclude parts of the building that are not commercially useable, such as vehicle parking and circulation, when applying land use policy²⁸³.</p>	
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²⁸³ Westminster Property Association

2.3 Building Height consultations (2017)

Between 27th March and 3rd July 2017, Westminster City Council conducted a suite of consultations under the title 'Building Height: Getting the Right Kind of Growth for Westminster'. In total, three different surveys were undertaken, an initial online consultation with interested individuals and organisations, followed by 500 face-to-face interviews across Westminster with residents, workers and visitors, and finally, an online London-wide Omnibus survey with a 1000 Londoners to seek their views on building height and growth in Westminster.

The main objectives of the Building Height: Getting The Right Kind Of Growth consultation programme were to discuss with residents, workers, visitors, stakeholders and Londoners:

- the opportunities and challenges associated with 'tall' and 'higher' buildings
- how to balance the needs for new housing and business growth with Westminster's heritage
- what approaches Westminster City Council could take towards these objectives.

The research approach was also designed to:

- Engage widely on the topic of building height and growth with a range of different audiences
- Engage, with a variety of different people within those audiences with different perspectives on building height and growth

2.3.1 Consultation process

Initial survey, Building Height Consultation (BHC)

Between 27th March and 29th May 2017, the Council published a consultation document called "Building Height: Getting The Right Kind Of Growth for Westminster" on its website. The document summarised the challenges around growth and building height.

A link to an online survey was published alongside the consultation document.

The council received a total number of 351 responses to the survey, almost all of them online through the Online council Forum (333) but also in paper (18). The council also received 67 written stakeholder responses as letters or emails. The respondents were of different profiles and included residents, developers, landowners, businesses and other stakeholders.

Survey for Westminster: residents, workers and visitors (SfW)

Following the initial survey, between 12th June and 23rd June 2017, the Council carried out face-to-face interviews to gather information about the views of residents, workers and visitors to the city in relation to growth and building height.

The Council used computer aided personal interviewing (CAPI) and interviews were undertaken across ten locations. The council interviewed 515 people and set quotas: a third of the interviewees were Westminster's residents, a third were Westminster's workers and a third were visitors to Westminster. The demographic profile of Westminster was also used to set further quotas for Westminster residents.

Survey of Londoners (SoL)

Finally, between the 29th June and 3rd July 2017 the council carried out an online Omnibus survey of Londoners administered by YouGov. The survey's goal was to gain the views of a representative cross-section of Londoners about growth and building height in Westminster.

The council received a total number of 1,015 responses, with a margin of error of +3%.

More detail on the research findings is set out in Appendix 12.

2.4 Informal booklets consultation (2013-2015)

A total number of 19 informal booklets were published between 2013 and 2015 to engage stakeholders with the council's changes to the partial review to the City Plan that took place and was materialised in the Westminster's City Plan (November 2016). The consultation sought a broad range of views about the future direction. The booklets form part of the background for the 2016 partial review of the City Plan but also of the full review the council is undergoing.

2.4.1 Notification

Notification was made by email to the vast majority of the consultees and the council's website also advertised this stage of consultation on the page relating to the Revision to Westminster's City Plan.

The titles and dates of consultation of the booklets are shown in Figure 7:

Figure 7 - Informal booklets titles and consultation dates

Booklet number	Booklet title	Consultation dates
1	Housing need, delivery and quality	12th March 2014 to 23rd April 2014
2	Flood risk	6th December 2013 to 14th February 2014
3	Basements	10th October 2013 to 29th November 2013
4	Mayfair and St James's	6th December 2013 to 14th February 2014
5	Food, drink, entertainment, arts and culture	12th March 2014 to 23rd April 2014
6	Westminster's economy	12th March 2014 to 23rd April 2014
7	Social and community uses	12th March 2014 to 23rd April 2014
8	Design	29th July 2014 to 19th February 2015
9	Health, well-being and personal safety	29th July 2014 to 19th February 2015
10	Open space and green infrastructure	29th July 2014 to 19th February 2015
11	Planning and pollution control	29th July 2014 to 19th February 2015
12	Public realm and advertisements	29th July 2014 to 19th February 2015
13	Transport and movement	29th July 2014 to 19th February 2015
14	Energy	12th January 2015 to 31st March 2015
15	Heritage, views and tall buildings	12th January 2015 to 31st March 2015

16	Spatial policy and implementation	15th December 2014 to 27th February 2015
17	Affordable housing	15th January 2015 to 31st March 2015 (updated on the 3rd February to include references to recently published Housing Market Evidence)
18	Mixed use and office to residential conversion	15th December 2014 to 27th February 2015
19	West End	12th January 2015 to 31st March 2015

2.4.2 Consultation events and meetings

As part of its Duty-to-Cooperate, the informal booklets were also discussed in a number of meetings attended by Westminster City Council's officers. Further details can be found in the Duty to cooperate Statement.

2.4.3 Respondee and responses

The council received a high number of responses: a number of consultation responses received showed support to the council's proposals, a number objected to it and others just commented. The number of responses per booklets is attached as Appendix 13 and the list of consultees as Appendix 14.

2.4.4 Summary of key issues and how these have been taken into account

Figure 8 - Summary of key issues and how these have been taken into account (Booklets)

Policy	Key issues identified	Council's response
1 Housing need, delivery and quality		
S14 Optimising Housing Delivery	Consultees found density ranges to be too prescriptive.	The density matrix has been removed from the policy. Site specifics to determine appropriate density will be taken into account and this approach is clarified in the supporting text.
S15 Meeting Housing Need	Concerns were raised in relation to marketing requirements for HMOs. Although the reduction of family size units was welcomed, consultees asked for more flexibility and recommended policy should not prohibit two-bedroom market flats with single second bedrooms.	Marketing period for HMOs is set at 18 months in recognition of the need to be sure there is no demand for them before they are lost. The requirement for two bed units to have double bedrooms has been revised to only require a proportion.
CM14.1 Housing quality	A number of comments highlighted that the space and quality standards, the daylight requirements, the amenity space requirements and the play space requirements were too prescriptive.	Policy has been amended to take into account the new national space standards, the London Plan and Building Regulations.
CM15.1 Housing for vulnerable people	Comments received asked the council to explain under which circumstances the loss of housing for vulnerable accommodation would be supported.	Policy allows for evidence to be presented that there is no demand for these types of housing.
CM15.2 Housing for older people	Comments asked the council to be clearer in relation to credits, to consider forms of sheltered housing that may fall within the C2 Use Class and to advocate for high quality standards.	Credits have been abandoned and policy has been redrafted to take into account other comments.
CM15.3 Student accommodation	The ban on short-term letting was not welcomed and a number of comments argued that the use of buildings should not only be restricted to students of Westminster based institutions.	The policy has been nuanced to prevent short term letting for longer than 90 nights within a calendar year. This will allow universities to let out student rooms during the summer period where they are related to conferences whilst affording some protection for residents. The latest housing market assessment has shown there is little demand for

		more student housing in Westminster and there are already a large number of education establishments that accommodate students studying outside the borough. The report of the London Academic Forum recommended dispersal of student accommodation away from the central boroughs.
2 Flood risk		
S32 Flood risk	According to the comments received, policies should refer to sewer flood risk, make a distinction between vulnerable developments that are proposed in areas of tidal breach and those that fall outside and provide further guidance in relation to flood risk assessments.	The comments are noted and addressed. Additionally, the council has prepared a draft Flood Management and SuDS pro forma which developers will be required to complete and submit with planning applications and will publish a revised Strategic Flood Risk Assessment to assist applicants.
4 Mayfair and St James's		
2.4 Mayfair Special Policy Area	The definition of Mayfair, Bond Street and St. James's was judged as too ridged. However, the protection of art galleries and independent shops was supported.	The importance of art galleries has been emphasised and policy also seeks to ensure future retail development responds to local character and distinctiveness.
2.5 St James's Special Policy Area	The proposed retail classification (bespoke/unique/antique/limited edition) was judged to be too restrictive for an area as diverse as St James's.	Noted – emphasis within policy will be on seeking to ensure future retail development responds to local character and distinctiveness.
2.6 Savile Row Special Policy Area	Policy was broadly supported.	Noted.
5 Food, drink, entertainment, tourism, arts and culture		
S22 Tourism, Arts and Culture	Consultees argued that the policy is not clear about how the usage of space would be considered "clearly ancillary" and how the circumstances of use might be judged. Consultees also raised concerns in relation to extensions as the policy may restrict development of individual isolated venues.	The policy has been clarified and simplified following comments received, placing a strong presumption on the protection of arts and cultural floorspace, setting the approach to commercial developments and a much clearer approach to extensions.
S23 Hotels and Conference Facilities	The general restriction of new hotel related business to non-residential areas was welcomed.	Noted.

S24 Food, Drink and Entertainment Uses	Although the tables' approach was broadly supported, consultees thought they could be difficult to apply and could sometimes fail to take into account a number of specific circumstances. Moreover, the policy was judged not to be clear enough in relation to assessments and night-time economy.	The policy has been redrafted to be clearer and allow for more flexibility. It also includes the requirement for a management plan and seeks to align planning and licensing regimes to make sure the evening and night-time economies are appropriately managed.
CM22.1 Theatres	Consultees asked the council to set out detailed acoustic criteria so there is full clarity upon the acoustic standards that need to be met through new residential schemes in a theatre's vicinity. Moreover, they asked the council to be clearer, so policy only applies in those circumstances where the theatre use has not been abandoned.	Noise issues are covered in a new local environmental impacts policy which covers noise in detail as well as the "Agent of change" principle (London Plan). The City Plan protects theatres for those uses.
CM24.1 Protection of Public Houses	Policy protects only a proportion of drinking establishments (pubs) where the primary uses is drinking alcohol in Class A4 uses. Policy was judged to be too restrictive by a number of consultees although the protection of pubs was broadly supported. Consultees also detailed that policy only protects a proportion of pubs where the primary uses is drinking alcohol in Class A4 uses.	The policy protects public houses regardless of use class, and it is considered that a blanket approach is most suitable, in line with emerging London policy and following the example of other boroughs. Detailed marketing requirements have been included in the policy and having regard to comments received and local circumstances, we consider that an 18-month period is suitable across Westminster.
CM24.2 Sex-related uses	No comments.	No comments.
CM24.X Shisha smoking	A number of comments welcomed a restrictive shisha-smoking policy. However, some concerns were raised in relation to cultural and racial targeting and opening hours. Consultees thought the policy should be clearer when defining uses, ancillary uses and the use of outdoor areas.	The policy is focused on the health impacts of shisha smoking, which is widely evidenced. The policy follows a blanket approach for premises offering shisha, rather than a separate approach for ancillary uses.
6 Westminster's economy		
S12 NWEDA	Consultees raised concerns about the clause that supports small loss of residential development.	Support for loss of residential removed – NWEDA policy now focusses on strategic priorities for growth
S13 Outside the CAZ and NWEDA	No comments.	No comments.

S19 inclusive Local Economy and Employment	A number of consultees thought that the current mixed-use policy is restrictive on the ability of landowners and developers to deliver new employment space.	Mixed use policy has been refined (and renamed) to better incentivise new employment floorspace in the CAZ.
S20 Offices and Other B use Business Floorspace	According to a number of consultees, policy needs to explain what the council considers to be workspace suitable for small and medium enterprises and encourage refurbished and extended office floorspace in the CAZ.	Policy seeks to provide for economic diversity by seeking a range of workspace typologies and explanatory text to policy sets out considerations of what may be suitable for SMEs.
S21 Retail throughout Westminster	According to a number of consultees, the requirement that units should be vacant during the marketing period does not give any weight to diligent marketing that may have been undertaken leading up to lease expiry and the range of business workspace sought should be more clearly defined.	Policy now refers to marketing rather than vacancy requirements.
S27 Buildings and Uses of International Importance	According to submitted responses, if opportunities arise for reuse of buildings located in St James's Estate, these will likely be a result of the building being surplus to the requirements of that particular diplomatic or allied user. Given the likely limited demand from alternative users, this policy could result in long term vacancies	The policy seeks to protect uses of international or national importance with include a wide range of uses including commercial, diplomatic, institutional, scientific, medical, cultural, sport and leisure uses. Conversion to residential use would however be resisted as the policy seeks to protect London's World Class City status.
CM1.4 Retail in the Central Activities Zone	Consultees asked the council to consider that retail uses at the basement, first and upper floor levels should have greater flexibility than retail use at ground level.	Policy now allows for some flexibility at floors other than ground floor level (or ground and first floor level in larger centres), where supportive of wider retail function.
CM2.2 Portland Place Special Policy Area	Consultees argued that policy should be clearer in relation to the loss of institutional uses outside the Portland Place SPA and that the policy should manage the potential harm of any extension and infill development.	Policy removed – design, heritage and neighbourly (Managing Development for Westminster's People) policies can be used to determine proposals such as extensions.
CM2.3 East Marylebone Special Policy Area	Consultees asked the council to reduce the marketing period as vacancies are increasing and leading to inactive frontages.	Policy has not been included in City Plan in response to changing character of the area.
CM13.1 Local Shopping Centres	No comments.	No comments.

7 Social and community uses		
S34 Social and Community Infrastructure	Responses asked the council to better define what “social and community floorspace” is and explain if it also applies to private floorspace. Although the protection was supported, the policy should be clearer in relation to delivery of new uses, the protection of private uses and marketing tests and assessments should not be that excessive.	The policy is now clearer about the protection of specific types of social and community uses (either private or public) and is worded flexibly to provide appropriate protection to all floorspace where this can be controlled through the planning system. Proposals to convert social and community floorspace to other uses will need to address other policies in this plan and further elaboration is not considered appropriate here. Once this type of use is lost it is very difficult for it to come back again once a commercial use is in place. An 18-month marketing period is considered appropriate and proportionate to the importance of protecting such facilities. 18 months represents a reasonable period for alternative providers to come forward.
CM34.1 Public Toilets	Policy was welcomed but concerns were raised about its provision as it is not always possible (access, management, heritage and security issues). Consultees also thought the policy should also encourage provision of public toilets in designated town centres.	Comments noted. Public toilets are required in developments that will generate a large number of visitors.
CM2.1 Harley Street Special Policy Area	Policy and protection were welcomed although some comments were judged as not sufficient: a number of responses highlighted that the 12-month marketing period was not enough and that the loss of medical and associated uses should not harm the character and the supply of medical uses. Moreover, land swaps were not considered to be appropriate outside the Core CAZ as they could damage the residential/business mix.	Wording has been strengthened by seeking to restrict the type of residential accommodation in the area to ensure medical function is not undermined. 12 months is considered a reasonable marketing period give the pool of potential occupiers for such premises. Policy no longer specifically refers to land swaps – this is covered in general terms in the Implementation chapter of the plan. Core CAZ designation has been removed from the Plan.
8 Design		
S28 Design Principles	Although the hierarchy of environmental performance was supported, a concern was raised in relation to the policies as they could prevent small scale sites from being developed as it is not always easy to achieve carbon targets.	There is a cumulative impact on carbon emissions from small scale development in the borough. It is accepted that it may not be technically feasible for smaller schemes to meet the targets, targets will only apply to larger scale schemes and are consistent with standards applied by other London boroughs.

S44 Sustainable Waste Management	Consultees thought that policies require greater consistency with the London Plan and should give more importance to waste as a source of reusable resources that can support sustainability goals. Moreover, they asked that new waste management facilities take into account the potential impact on the surrounding area.	A new waste management policy has been drafted.
CM28.1 Infill Development	Consultees asked the council to specify whether contemporary development to address business or residential needs is allowed behind retained facades in unified townscape areas.	The draft heritage (conservation areas) policy supporting text makes reference to demolition and potential for development behind retained facades and circumstances under which this will be considered.
CM28.2 Extensive Development	Emphasise user hierarchy; reinstating the need to consider permeability for pedestrians first, then cyclists, then buses, then freight/ delivery vehicles, then other vehicles. Explicit reference needed with regard to conserving heritage in the wake of extensive development.	Issue of user hierarchy is set out within sustainable transport policy. Extensive development policy makes reference to need to consider setting and needs to be considered alongside other policies in particular heritage policy which protects heritage assets and their settings.
CM28.3 Sustainable Criteria and Assessments	According to the responses received, the relationship with sustainable criteria to the Governments zero carbon targets is unclear and a number of respondees it is not appropriate to impose the same sustainability criteria on all types of refurbishment as they can vary dramatically.	Policy & criteria have been revised.
CM28.4 Alterations and Extensions	Comments supported extensions in some cases but asked the council to be clearer as roof extensions and alterations should have regard to their impact on strategic views and amenity of neighbours.	Views policy addresses protection of views and alterations and extensions policy also includes reference to impact of roof extensions on amenity and character. Alterations and extensions will play an important role for achieving growth in Westminster, given the modest scale and fine grain of the existing built environment and the strong representation of heritage assets in the borough. Incremental change is referred to in the final version of the City Plan.
CM28.5 Boundary Walls and Railings	No comments.	No comments.

CM28.7 Shopfronts	<p>Respondees judged the policy as too restrictive as it confines advertisements to shopfronts to fascia level and prohibits openable shopfronts. In relation to advertisement control policies, where considered necessary to protect the unique character of an area, should be evidence base according to the respondents.</p>	<p>Revised policy does not specifically reference openable shopfronts but includes more general design guidance. Similarly, advertisements policy no longer references fascia level, Such issues will be covered in supplementary guidance.</p>
CM28.8 Retrofitting sustainability measures	<p>Respondees though that policies should be more flexible in relation to the retrofitting of heritage assets and support retrofitting SuDS.</p>	<p>Policy supports SUDs and retrofitting. The retrofitting of historic buildings can be more challenging but is supported. Policy includes some specific guidance in relation to retrofitting historic buildings in supporting text.</p>
CM28.9 Incorporating landscaping on and around Buildings	<p>The policy objective to provide an area equivalent to 100% of the building's footprint in living walls and roofs and ecologically sensitive landscaping seemed too onerous to a number of respondents and further guidance on materials and architectural detailing would be welcomed.</p>	<p>Guidance on landscaping is provided in amended green infrastructure policy.</p>
CM28.10 Plant and machinery	<p>No comments.</p>	<p>No comments.</p>
CM38.1 Trees	<p>According to a number of consultees, there is a considerable variation in quality, life expectancy and amenity value in tree planting, therefore, removal and replanting in the local vicinity could be a consideration. Relocation could also be considered in order to deliver developments with other significant public benefits.</p>	<p>Issue covered within green infrastructure policy.</p>
9 Health, well-being and personal safety		
S29 Health, safety and well-being	<p>Policy should consider sunlight should be considered in the round, include references to the necessity of a "clean" city and to active travel.</p>	<p>This policy has not been taken forward as a policy in its own right, instead it has been woven into many of the other policies in the City Plan. Daylight/sunlight is considered in housing quality policies and offers some flexibility on how it is assessed, taking into account Westminster's dense built form. Ensuring clean streets is taken forward in the commerce policies to ensure the effects of commerce do not lead to unhealthy environments. Cycling has its own policy now and the delivery of infrastructure to support this sustainable method of travel is strongly encouraged.</p>

CM29.3 Security Measures and high-risk developments	Security features on the public highway should only be considered once other alternative proposals have been exhausted and the policy should not be interpreted as requiring developers to provide a higher level of counterterrorist measures than they consider appropriate for the development proposed.	The policy addresses these points.
CM29.4 Security measures in the public realm	According to a comment raised, policy should acknowledge that new CCTV may also be required for other reasons aside from security concerns, is not the only solution to security measures in the public realm and should consider its impacts on heritage assets.	CCTV is not specified in the policy. The right solution should be found to address security issues depending on the specifics of the scheme and on the advice of specialists.
CM35.2 Play space	A responses asked the council to include reference to Inclusive play and reiterate the commitment to promote active travel.	Noted.
10 Open space and green infrastructure		
S35 Open space and green infrastructure	A respondent asked the policy to refer to green and blue infrastructure and take into account corridors that go beyond Westminster's boundaries"	Noted. Both blue and green infrastructure are covered by policies in the City Plan.
S36 SINC's	No comments.	No comments.
S37 Westminster's Blue-Ribbon Network	The policy was supported but policy should be amended to encourage co-operation with other riparian boroughs in central London, refer to the Water Framework Directive, the Thames River Basin Management Plan, the Thames Estuary 2100 and to flood risk policies and actions.	Policy has been consolidated and references to the Thames River Basin Management Plan, the Marine Policy Statement and the emerging South East Marine Plan are now included.
S38 Biodiversity	Comments asked policy to refer to the Water Framework Directive, the Thames River Basin Management Plan, include references to WFD and Thames Estuary 2011. Policy wording needs should also be clearer.	Noted
CM35.1 New open space and green infrastructure and addressing deficiencies	According to a comment, policy should say that in areas of Open Space Deficiency which are already heavily built up, the council will seek to ensure whenever practicable that provision is made using the roof area of the development as OS and should clarify between privately owned and publicly accessible space.	Noted.

CM35.2 Existing open space and green infrastructure	Policy and protection supported but policy should introduce more criteria in relation to living roofs, noise levels and air quality according to comments received.	The sequential application of the policies will ensure that all topic areas are covered.
CM37.1 Access along the BlueRibbon Network	According to responses received, reference to the establishment of “new canal towpaths” is a misnomer as the towpath is only located on one side of the canal and the create of new walkaways ins not supported/possible and the policy lacks a general aim to ensure the needs for public access are balance with the need for riverside habitats and ecology	The Waterways and Waterbodies policy acknowledges the balance that has to be met between public access to the waterways environment and the need to protect riverside habitats and ecology.
CM37.2 Transport on the Blue Ribbon Network	Policy supported but should also mention air quality.	Reference to air quality now included.
CM37.3 Development built into or over the Blue Ribbon Network	According to comments, policy seems to permit only dual-purpose projects for both pedestrians and cyclists, excluding any possibility of providing separately for them and should refer to flood defences. The policy should mention the Canal and River Trust, the Water Framework Directive and the Thames Estuary 2100.	Noted.
CM37.4 Mooring on the Blue Ribbon Network	According to comments, policy should be clearer and is too restrictive as it suggests that commercial moorings will not be appropriate in certain locations and it only allows permanent moorings that should be assessed on it owns merit.	This policy has been merged alongside general waterways and waterbodies policy. Encouragement for moorings in appropriate locations has been strengthened. Criteria for permanent moorings on the Thames will require careful management.
11 Planning and pollution control		
S31 Air quality	According to comments, policy should acknowledge the cross-boundary nature of air pollution, be clearer in relation to AQAs and include references to the role that active travel and green infrastructure can play.	The policy covers air quality as it relates to development. Impact of active travel on air quality is detailed in the connections chapter.
S32 Noise	Policy should acknowledge the cross-boundary nature of noise pollution and acknowledge that an environmental noise assessment may be more appropriate as acoustic	Noted.

	reports generally relate to internal noise and don't pick up vibration issues in some circumstances.	
CM32.1 Preventing Noise Intrusion from External sources	No comments.	No comments.
CM32.2 Noise from Plant and Machinery and Internal activities	Policy is supported but respondents asked the council to include a requirement that where the application is for a food, drink or entertainment use the space outside the premises, whether or not it forms part of the development site, will comply with the same restrictions on noise as it would if it was inside the building. Policy should be modified to add new explicit conditions to Decision Notices.	The application of internal sounds standards outside a premises would not be viable due to the variables of background noise across the borough. The wording of conditions falls outside the parameters of the City Plan consultation. Noise Standards will be set out in a technical guidance note.
CM32.3 Preventing noise transfer through internal building fabric to inside residential	Responders asked the council to give consideration to extending the sound insulation standards being applicable also to other noise sensitive uses like hotels.	Noted.
CM 32.4 Protecting Tranquil Open Spaces	According to comments received, the policy could address the potential for noise to cause adverse impacts in adjoining areas.	Noted.
SXX Lighting and light pollution	According to comments received, the policy requires the submission of extensive supporting information in connection with minor installations that could be onerous. Objection to the suggested curfew on internal lighting (12pm Core CAS and 23pm non-Core CAZ).	Noted. The core and non-core CAZ designations have now been superseded and the policy has been updated.
SXX Construction Impact Management	Policy welcomed but according to respondents it should confirm that the relevant details can be secured by imposing suitably worded conditions, as it is often not	Noted.

	practical to provide full construction managements details at the time a planning application is submitted.	
SXX Contaminated Land	Policy is clear according to respondents and sets clear requirements although it would add clarity to delineate the responsibility for reviewing these sites. Policy should make reference to the Environment Agency's Model Procedures for the Management of Land Contamination.	Noted.
12 Public Realm and Advertisement		
S18A Managing events in the Public Realm	According to respondents, policy should support cultural events in appropriate areas	The policy benefits from a stronger emphasis on the support for cultural events in appropriate locations as part of Westminster's pivotal role for national and international tourism.
CM18.1A Managing Commerce in the Public Realm	According to respondents, policy should acknowledge the shortage of public seating whilst referencing priority of good pedestrian flow and not causing obstructions from tables/chairs (policy should try to find the balance).	Policy ensures events in the public realm and associated structures and signage seek to minimise adverse impacts on the amenity of residents as well as businesses. Further considerations include to give priority to the safe movement of pedestrians, particularly those with mobility and sensory impairments and at station entrances and other busy locations. Street furniture, including floodlighting and associated cabling, provided in conjunction with development and/or associated spaces and public realm should be of a suitable standard of design having regard to the character and quality of the existing townscape. It should be sited to be visually discreet and not impede enjoyment of the public realm.
CM18.1B Managing Events in the Public Realm	According to comments received, policy should have regards to public realm impacts from street performers, refer to impacts on business activity, ensure CCTV is not impeded and consider a mechanism that allows for the recouping of funds from event organisers to be directed specifically to fund pavement cleansing regimes as part of post event cleaning according to responses received.	Impact of events on business activity is addressed in policy 16 (Visitor Economy).
CM28.12 Advertisements	A number of policy clauses of the policy do not conform to the Advertisements Regulations or NPPF guidance	The policy on signs and adverts has been re-phrased to be more positive and less restrictive. However, Westminster

	according to respondents. The policy is judged to be too restrictive and should recognise that a number of telephone kiosks or highway structures benefit from Class 16 or 9 consent, make explicit when permission is required, refer to the preservation of Heritage assets, be clearer in relation to seasonal displays, temporary banners and flagpoles.	has a duty to retain and enhance the unique historic environment of Westminster, which has an unsurpassed representation of rare heritage assets and which is part of a sustainability perspective in line with NPPF. The proposed advertisement policy is silent on the use of flagpoles, temporary banners and seasonal displays. These matters are detailed and more appropriate in supporting guidance.
CM28.13 Attractive, Accessible and Secure Streets	Respondees asked policies to especially welcome which reinforce the importance of open space, green infrastructure and the value of the blue-ribbon network.	These matters are covered in the green infrastructure policy. The overarching design principles policy also highlights the importance of a coherent, strategic green and blue infrastructure for the benefit of sustainability, recreation, ecological and townscape character.
CM28.14 Public Art	According to respondents, policy should acknowledge that off-site provision of artwork or pooled contributions may be more practical or suitable than on-site provision of public art, as it is not always an integral design element.	The public art policy no longer requires public art to be provided – it only encourages.
13 Transport and movement		
CM41.1 Transport Assessments	According to comments, policy removes quite a lot of developments from their responsibility to produce a TA and should lower thresholds when close to borough boundaries.	This policy is no longer being taken forward and its requirements have been incorporated elsewhere.
CM41.2 Road Hierarchy	No comments.	No comments.
CM41.3 Traffic	Respondees thought that the policy should try to ensure re-routed traffic does not cause undue congestion and detrimental impacts on minor or local roads, recognise that one-way street to two-way operation may reduce parking provision or loading facilities and have an impact on local shops – policy in general too restrictive on two to one-way conversion.	The new policy has been incorporated into other policies, simplified and made more effective by removing unambiguous wording. The council is opposed to new one-way streets due to the congestion, pollution and amenity impacts from re-routed traffic.
CM41.4 Pedestrians	No comments.	No comments.

CM41.5 Pedestrian Crossings	No comments.	No comments.
CM41.6 Cycling	Multiple concerns were raised regarding dangers to and from cyclists from increase in numbers and pedestrian conflict. Moreover, it was highlighted that the council's preference for segregated routes for cyclists over shared use routed through open spaces conflicts with guidance produced by TfL.	This policy has been simplified, strengthened and made more positive towards cyclists (and merged into a policy to include walking), incorporating other proposed policies. More emphasis has been placed on safety of cyclists and other road users in policy wording and position of the policy in the chapter indicates it is secondary to the needs of pedestrians.
CM41.7 Cycle Hire Schemes	Respondee asked policy to be clearer in relation to docks demand.	This policy approach has been made clearer.
CM41.8 Other Vehicle Infrastructure	Respondee thought that policy should consider consistency with TFL electric access requirements [40%], consider electric vans as an alternative for recycling transportation and car clubs.	This policy has been incorporated into policies on vehicle parking (car clubs) and on refuelling, electric vehicles and new technology. Parking standards have incorporated requirements for the provision of EV charging points, which go beyond London Plan requirements. Proposals for car clubs will need to demonstrate that parking stress, local ownership levels and trips will reduce to be supported.
CM41.9 Motorcycles and other powered two-wheelers	No comments.	No comments.
CM41.9 Cycle Parking and Facilities	Cycle parking minimum within secure unit seems too low	The minimum requirement for at least 2 spaces is reasonable, considering proposals for as little as one additional housing unit could come forward. Detailed cycle parking standards have been moved to appendices.
CM41.10 Vehicle Parking	According to comments received, policy should consider coach parking provision for hotels and a restriction on the rights of new residents to obtain on-street parking permits as a suitable mitigation measure in areas of parking stress.	Detailed car parking standards have been moved to appendices. The maximum standard approach has been taken forward in line with the London Plan and NPPF. The parking permit system operates separately from the planning system and cannot be considered here.

	Policy should avoid identifying minimum requirements, this will encourage more car use.	Notwithstanding the policy recognises the strong relationship between residential parking in terms of its impact on the public realm, and the distribution of parking permits. Therefore, the policy advises that parking permit issue should be kept under review. Proposals for off-street non-residential parking, including coaches, will need to demonstrate operational need and will be assessed on a case-by-case basis.
S42 Servicing and deliveries and freight	No comments.	No comments.
CM43.1 Public Transport Infrastructure	Greater mention of River Transport more and consistency to TfL is needed.	River transport has now been incorporated into policies on waterways and waterbodies. Pier facilities are considered in more general terms, so the distinction on river boat services is no longer relevant and has been removed.
CM43.2 Highway Improvements	No comments.	No comments.
CM43.3 Highway Signage	Policy should consider impacts on heritage assets	The impact of new signage on heritage assets is covered by the general protection for heritage assets in the overarching heritage policy.
CM43.4 Re-fuelling Stations	Policy should also refer to the refuelling station in Clipstone Street.	This policy has been revised and refuelling facilities are no longer explicitly named. Existing facilities are protected under the wording of the new policy.
CM43.5 Air Transport	The term “public” is too broad for this policy to be useful in significantly restraining helicopter use in central London.	Policy has not been carried through to the revised City Plan.
CM32.2 Pedestrian and cycle access in open spaces	No comments.	No comments.
14 Energy		
S28 Design	The hierarchy of environmental performance is supported although the policies could prevent small scale sites from being development as it is not always easy to achieve carbon targets (especially if in CA, LB).	There is a cumulative impact on carbon emissions from small scale development in the borough. It is accepted that it may not be technically feasible for smaller schemes to meet the targets. However, they must demonstrate

		through an Energy Assessment that all opportunities to reduce carbon emissions in the development have been taken.
S39 Energy infrastructure	The aspiration to establish additional decentralised energy networks is welcomed. However, the policy should acknowledge that the introduction of CHP may not be the most carbon effective energy system for a building in every case	The council supports expansion of district heating networks. As the decarbonisation of the grid continues the council will review all appropriate carbon and energy efficient technologies that are appropriate for development in the borough.
S40 Renewable energy	A number of comments supported the policy approach which seeks to maximise renewable energy where practical and where compatible with reducing overall energy emissions. The approach taken that biofuel or biomass combustion are not supported was also welcomed. However, a number of comments raised the issue about the acceptability of new developments with no onsite renewables but with lower carbon emissions than a scheme that meets the 20% onsite renewables.	The council will follow the Energy Hierarchy set out in the London Plan which prefers cleaner alternatives to combustion-based technologies. We are committed to improving air quality in the city.
CS28.3 Sustainable criteria and assessment	According to comments received, the level of assessment should be proportionate to the scale of the development. It is not clear from the policy whether developers must carry out offsetting projects themselves or should pay offsetting contributions to Westminster's carbon offsetting fund.	New developments should be designed in accordance with the London Mayor's Energy Hierarchy. On small schemes the fabric first approach is the best way to maximise carbon reductions in a financially viable manner.
CM29.1 Managing overheating and Air conditioning	As worded the policy may place disproportionately onerous requirements on smaller scale applications and it is recommended that the potential impact on local amenity is carried out through specific controls on noise and vibrations rather than by way of a restrictive policy approach. In relation to air conditioning units the policy is too restrictive.	The new policy is considered to be appropriate for all scales of development. The noise policy is supported by technical noise standards.
15 Heritage, views and tall buildings		
S25 Heritage	According to comments, too much weight is given to heritage assets that the development capacity of Westminster is unduly constrained, impact design and	Heritage policy has been made more concise but important that it is sufficiently comprehensive given the extent and importance of Westminster's heritage and to be

	innovation. Heritage policies narrow in scope, may require greater detail in the supporting documents.	in line with our statutory duties and the NPPF. Further detail will be set out in supplementary guidance.
S26 Views	This policy is not consistent with NPPF and LVMF guidance according to comments received. Detail in supporting docs on Local and Metropolitan view – not appropriate in plan.	The plan has been updated in line with NPPF and LVMF. Identifying local views of Metropolitan importance adds value to the local plan. Approach to local views has been reviewed and policy amended.
CM25.1 Listed Buildings	Respondee thought that policy should ensure sufficient flexibility allows listed buildings to be used (and address viability matters) and should recognise that high quality design extensions could be appropriate.	Policy supports finding a new, viable use which protects the heritage value of listed buildings to secure their long term, sustainable conservation, in line with the NPPF and allows appropriate and sensitively detailed extensions to listed buildings.
CM25.2 Conservation Areas	Comments highlighted that policy should encourage innovative design and that policies and Conservation Area Audits should not contain a blanket presumption against roof extensions.	The design principles policy has been drafted with new clause to seek to encourage innovation in design (while being mindful of statutory duties in relation to heritage). Conservation Area policy has been updated. The City Plan recognises the value and importance of innovative design, in the right places, which respects the scale and character of the local built context, but which add meaningful values to the area.
CM25.3 Demolition of Listed Buildings and buildings in Conservation Areas	According to respondents, policy does not consider demolition tests set out in the NPPF and the retention of room scale behind retained facades should not be an absolute requirement.	Not considered necessary to repeat tests set out in the NPPF, however the policy has been amended and strengthened. Reference to scale of room behind retained facades omitted.
CM25.4 Archaeology	Sites should require an assessment of their significance and value, which may require desk-based assessment or exploratory fieldwork.	Policy supporting text includes a reference to applicants undertaking archaeological assessment.
CM25.6 Westminster World Heritage Site	The 'attributes' follow the principal headings from the Nominations Resource Manual and Operational Guidelines and policy could be more concise – too much detail could	Attributes were included in the booklet for information and are not included in policy itself but being developed in the management plan, where they will be made more concise. Agree that cross-boundary collaboration is critical for the

	risk over-complicating Heritage Impact Assessments based on them. Policy should be underpinned by cross boundary collaboration.	protection of the world heritage site and this is referenced in policy.
Tall Buildings	A number of comments received asked for further clarification on what a tall building is for the council. CA number of comments considered the policy too restrictive in terms of locations and asked others asked the council to refer further to impacts on the built form/urban grain of streets.	The new policy includes an updated definition of tall buildings. As a strategic policy it defines areas where tall buildings may be appropriate in principle from a policy perspective and avoids pinpointing specific development sites. The policy further clarifies how tall buildings schemes will be assessed and which criteria will be applied.
16 Spatial policy and implementation		
S33 Planning obligations and delivering infrastructure	Comments recognised that development is stifled by heritage concerns in Westminster and that the Plan should give priority to housing as well as to commercial uses. A number of responses asked the council to have a more proactive approach to heritage and local character and welcomed further discussion about new growth areas.	The whole plan has a pro-growth narrative, but a careful balance must be maintained to ensure our precious heritage is conserved.
Rights to Light	No comments.	No comments.
CM47.1 Implementing the Presumption in Favour of Sustainable Development	No comments.	No comments.
CM47.2 Enforcement	No comments.	No comments.
17 Affordable housing		
S14 Optimising Housing Delivery	Comments recognised that the council should avoid the over-provision of very large units but not restrict its provision. A number of comments found the density ranges too strict as not taking into account the specific circumstances of individual sites. The support of higher densities in the CAZ was broadly welcomed.	The nationally described space standards have been included in the policy, which also limits under-optimisation of sites i.e. delivery of super-sized units over 200sqm is not allowed. This is to make the best use of land in Westminster whilst also recognising the role it plays on the

		global housing market. The density matrix has been removed.
S16 Affordable Housing	A number of consultees did not support the delivery of family size homes in the CAZ and-bedroom intermediate homes. Although the mixed communities' principle was supported, there were concerns about the feasibility as building affordable homes in already built areas is very difficult. Finally, policy should refer to the role that RPs can play.	Delivery of family housing is a priority across Westminster and delivery of residential among commercial uses is essential for maintaining mixed use in the CAZ. The agent of change principle will prevent issues of conflict between these types of uses. The proportion of home sizes for intermediate housing will reflect the waiting list. Policy wording has been altered slightly to reflect changes in national policy regarding balanced communities. References to the private rented sector have been included in the housing policies to support this type of housing. A new policy has been introduced to address emerging shared living rented models.
CM14.1 Housing quality	In relation to space standards, policy should be relaxed to allow for the development of more affordable homes.	The Nationally Described Space Standards were introduced following the publication of this booklet, have been adopted by the London Plan and will be applied in Westminster.
CM16.1 Meeting the range of affordable needs	The policy is generally supported as the respondents acknowledge the necessity of addressing the needs of middle-income households. However, a number of comments recommended adjusting the intermediate income thresholds that homes sizes are skewed towards need and that policy acknowledges that shared ownership does not work well in Westminster. Finally, a number of comments addressed the service charges issue as it could affect viability.	The emphasis on the delivery of intermediate housing (60% instead of 40% of all new affordable homes) will address the tenure imbalance. However, income thresholds are set by the Mayor and the bedroom size requirements have been adjusted to take account of need. Policy notes the challenges of the affordability of shared ownership and favours rental and other innovative options for intermediate housing. The definition of intermediate housing in the glossary touches on the impact of service charges on affordability.
CM49.3 Credits	In general, comments support the credits system idea although they recognised that they don't work very well in practice and are very complicated. Respondees raised a number of concerns in relation to the operation of the scheme.	The credits policy is not being taken forward as it is too complicated and not expected to deliver the value hoped for.
Booklet 19 West End		

Clusters	The policy should recognise the West End as a creative cluster and note there are members clubs, cinemas and theatres throughout the clusters.	Policy supports the diverse mix of uses in the area, which includes activity in the creative sector.
Mayfair SPA	The Plan should encourage growth in the area but a SPA is not necessary. However, policy should prevent the art and antiques market from moving elsewhere and refer to the fact that A1 use class does not distinguish between small independent retailers and the international branded retailers.	SPA considered necessary to manage growth in the area that responds to local character and distinctiveness – including important role in supporting the art and antique trade. Policy seeks to ensure where planning permission is required, new retail in the SPA respects and contributes to local character and distinctiveness.
West End WESPRA	The existing WESRPA needs to clearly define the extent of the opportunity and facilitate appropriate retail-led development. Special Policy Areas are not the most appropriate land use tool to promote clusters of diverse land uses in Westminster. Note that creative and digital industries are on the rise in the West End.	Policy makes clear the role of the WERLSPA within the town centre hierarchy, and what uses are appropriate – with a clear steer towards retail and leisure uses, along with complementary commercial activity including offices. Special Policy Areas are considered a valuable tool in promoting and protecting clusters of particular uses within distinct parts of Westminster. The role of creative and digital industries in supporting economic growth is acknowledged within the City Plan. .

Appendix 1 Email (Informal consultation, 2018)



Appendix 2 Launch event attendees (Informal consultation, 2018)

Along with a small number of individuals, the following organisations were invited to and attended the launch of the informal consultation of the City Plan:

Atkins Global
Berkeley Group
British Land
Cathedral Area Residents Group (CARG)
CBRE
Church Street Ward Neighbourhood Forum
Cities of London & Westminster Conservative Association
Concilio Comms
Dolphin Living
ECD Architects
EOP UK
Four Communications
FTI Consulting
Gerald Eve
Grafton Advisors
Grosvenor Group
Historic England
Howard de Walden Estate
Knightsbridge Neighbourhood Forum
London Borough of Camden
Montagu Evans
Network Rail
New West End Company
Pimlico Neighbourhood Forum
The Portman Estate
Queen's Park Community Council
Resident Society of Mayfair & St James
Royal Parks
Soho Neighbourhood Forum
South East Bayswater Resident's Association (SEBRA)
St John's Wood Society
The Crown Estate
The Northbank BID
This is Paddington
Transport for London
Turley
Victoria Business Improvement District
Westbourne Park Family Centre
Westminster Property Association
Wild London
Westbourne Park Baptist Church

Appendix 3 Planning Policy website (Informal consultation, 2018)

Home > Planning policy


Revision to Westminster's City Plan

City Plan revision timeline update

The council is currently working on a complete review of its City Plan. Consultation on the draft City Plan started on Monday 12 November 2018 and will close on Friday 21 December 2018. [Download the draft City Plan and find further information on the consultation process](#)

Although the latest Local Development Scheme (June 2017) anticipated consultation on the new draft plan in September 2017, it has been necessary to review the timeline in direct response to the national and regional policy changes in recent months, particularly on affordable housing. Additionally, the Mayor has published his draft London Plan for consultation (December 2017 to March 2018) which directly impacts on Westminster's policies.


These policy, context and legislation changes have a relevant impact in the content and policies that form the City Plan. Adjusting the timetable enables the council to better consider all the new information when preparing the City Plan which means that in the long-run it will be more effective, relevant and up to date, negating early major reviews.

[Complete our online form](#)  to add your details to our consultation database, and we'll notify you of future updates and consultations.

Other relevant links

[Information on Westminster's planning policies](#)
[Westminster's City Plan](#)
[City Plan 2040](#)
[Unitary Development Plan \(UDP\)](#)
[Community Infrastructure Levy](#)

Appendix 4 Consultation website (Informal consultation, 2018)



City Plan 2019 – 2040

Westminster is a vibrant city which offers a wealth of opportunities for its residents, its businesses and more than 28.5 million tourists who visit each year.

City Plan 2019 – 2040 is a plan for all these people. It sets out an ambitious strategy to make Westminster one of the best places to live, work and play.

A city that will inspire the world.

Our City Plan is based on 3 key themes, linked to our City for All aims

- Homes and communities
- A healthier and greener city
- Opportunities for growth

Consultation


[Consultation on the draft City Plan 2019 - 2040](#) started on Monday 12 November 2018 and will close on Friday 21 December 2018. This will be followed by a statutory Regulation 19 consultation early in the New Year. This is your chance to comment on our draft new look plan and let us know whether you think it will achieve our objectives. [Find out more about the City Plan revision process](#)

Your views

- [Online consultation form](#)
- [Download the consultation form \(PDF, 126KB\)](#)

Find out more

- [Download the City Plan 2019 - 2040 \(PDF, 8.1MB\)](#)
- [Read our approach \(PDF, 3.1MB\)](#)
- [View the City Plan policies map \(PDF, 4.9MB\)](#)
- [Explore the interactive policies map](#)
- [Visit the story map](#)
- [Read the speech \(PDF, 890KB\)](#)



Appendix 5 Articles in newspapers (Informal consultation, 2018)

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The Guardian

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Money Property Pensions Savings Borrowing Careers

Real estate

Westminster council to ban supersize new homes

London borough's 150 sq metre limit aims to inspire building of more affordable properties



Rupert Neate *Wealth correspondent*
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Tue 13 Nov 2018 09:21 GMT



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'Mega homes' to be banned in central London as Westminster council sets limit on size of new builds

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Westminster Council oversees some of the city's most expensive postcodes. credit: GEOGRAPHY PHOTOS/UNIVERSAL IMAGES GROUP VIA GETTY IMAGES

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By **Helena Horton**
13 NOVEMBER 2018 - 12:23PM

Super-sized "mega homes" are to be banned in central London as Westminster City Council draws up new plans to ensure "real people" can buy properties.

The council, which oversees some of London's most expensive postcodes including Mayfair, Knightsbridge and Belgravia, said it will restrict new builds over 150 square meters (1,615 sq ft), in order to preserve homes for "real people" instead of oligarchs and members of the ultra-rich.

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Westminster council targets affordable housing increase

Words: Laura Edgar



Westminster City Council outlines plans to deliver nearly 1,500 homes a year and affordable housing for middle-income families.

City Plan 2019-2040 is based on three themes – growth; homes and community; and a healthier and greener city. Through these themes, the council's ambition is to build 1,495 new homes every year, 50 per cent more than the London Plan requires and it meets the number derived using the standard methodology.

Tags

LONDON

HOUSING

PLAN MAKING - LOCAL & NEIGHBOURHOOD

WESTMINSTER CITY COUNCIL

AFFORDABLE HOUSING

Appendix 6 Online consultation form (Informal consultation, 2018)



0%

Westminster City Plan 2019-2040 Consultation

Westminster is a vibrant city which offers a wealth of opportunities for its quarter of a million residents, over 50,000 businesses and more than 28.5 million tourists who visit each year. City Plan 2019 - 2040 is a plan for all these people. It sets out an ambitious strategy to make Westminster one of the best places to live, work and play.

This is your chance to comment on our draft new look plan and let us know whether you think it will achieve our objectives.

This online form allows you to save a draft response and revisit it to complete it another time. Please note, however, your response will not reach us until you hit SUBMIT at the end of the form. You will receive an email confirming your response has been successfully submitted along with a copy of your representation. If you do not receive a response within 24 hours of submitting it, please email planningpolicy@westminster.gov.uk.

For more information on the consultation please visit:
www.westminster.gov.uk/cityplan2040.

This consultation will close on Friday 21st December 2018.

Thank you for taking part.

Save and Continue Later

Next Page

Appendix 7 PDF consultation form (Informal consultation, 2018)



City Plan 2019 - 2040 Consultation

1. Welcome

Westminster is a vibrant city which offers a wealth of opportunities for its quarter of a million residents, over 50,000 businesses and more than 28.5 million tourists who visit each year. City Plan 2019 - 2040 is a plan for all these people. It sets out an ambitious strategy to make Westminster one of the best places to live, work and play.

This is your chance to comment on our draft new look plan and let us know whether you think it will achieve our objectives. For more information on the consultation please visit: www.westminster.gov.uk/cityplan2040.

This consultation will close on Friday 21st December 2018.

Thank you for taking part.

2. About you

Are you completing this questionnaire as a...? Please tick as many as apply

- ☐ Amenity Society
- ☐ Business
- ☐ Charitable/Voluntary Organisation
- ☐ Community Group
- ☐ Consultancy
- ☐ Councillor
- ☐ Education Establishment
- ☐ Housing Association
- ☐ Individual
- ☐ Westminster City Council Employee
- ☐ London Borough

☐ Neighbourhood Forum

☐ Other Public Bodies

☐ Other (please specify):

3. Personal and contact details

Full Name

Email address

Address

Organisation (if applicable)

Do you wish to be consulted on planning issues in the future?

☐ Yes

☐ No

(GDPR Notice: When ticking yes please note that Westminster City Council will store your personal details to ensure that you are consulted on planning issues across Westminster in the future. Your details will be kept by Westminster City Council and will only be used for the purpose set out above. Your personal details will remain with us until you wish to no longer be consulted. To remove your personal details from the consultation list, please email planningpolicy@westminster.gov.uk.)

4. Westminster City Plan 2019 - 2040 objectives

To what extent do you agree or disagree that Westminster City Council's City Plan will deliver each of the following objectives.

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know/No Opinion
Increase the number of high quality homes which people can afford	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide variety in terms of size, type and tenure of homes to meet need	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote mixed and inclusive communities, with a clear focus on affordability and family homes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enable job growth across a range of sectors vital to the UK economy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure everyone benefits from the opportunities created by Westminster's economy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enhance the West End as London's primary retail, leisure, and visitor destination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure our town centres and high streets can adapt and thrive	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Broaden and diversify the city's cultural offer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manage the impacts of evening and night-time activities on existing residential communities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enhance connections by improving cycling and walking options	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Protect, enhance and expand our valuable network of parks and open spaces	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve air quality, minimise noise and other polluting impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote the highest standards of design of buildings and public spaces, ensuring that Westminster is attractive and welcoming	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure our neighbourhoods thrive	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Don't Know/No Opinion
Conserve and make the most of our unique heritage and historic environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encourage innovations in building technology promoting more sustainable construction techniques and materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please use the box below to provide any comments on Westminster City Council's City Plan. Where possible, please quote the policy or paragraph number to which you refer.

Thank you for completing the questionnaire. If you would like to find out more please visit www.westminster.gov.uk/cityplan2040 email planningpolicy@westminster.gov.uk or write to City Plan 2019 - 2040 Consultation, Westminster City Council, 6th Floor, 5 Strand, London, WC2N 5HR.

Westminster City Council respects your privacy and is committed to ensuring that personal data is adequately recorded and processed lawfully. Further details of our Fair Processing Notice following the introduction of the General Data Protection Regulation can be found on our website: <https://www.westminster.gov.uk/fair-processing-notice>.

Appendix 8 Respondees (Informal consultation, 2018)

ID	Name	Channel
1	265 Strand Property S.A.R.L	Email and online form
2	4C Hotel Group	Email
3	Aberdeen Standard Investments	Email
4	Alchemy Asset Management	Online form
5	Amenity Society	Email
6	Amypro Limited trading as Sara Café	Email and online form
7	Ascendal Group Limited & Tower Transit Group	Online form
8	Baker Street Quarter Partnership	Email
9	Beckett Rankine Ltd	Online form
10	Berkeley Group	Email
11	Berkeley Square Estates	Email
12	Berners Allsopp Estate	Email
13	BlowUp Media UK Ltd	Email
14	British Antique Dealers' Association (BADA)	Email
15	C&C1 Ltd	Email
16	Canal & River Trust	Online form
17	Capital & Counties	Email
18	Cathedral Area Residents Group (CARG)	Email
19	Church Commissioners	Email
20	The City of London Corporation	Email
21	Clean Air in London	Email
22	Cleveland Clinic London	Online form
23	Clivedale London	Email
24	Concrete & Velvet Ltd	Online form
25	Criterion Capital	Email
26	Crosstree Real Estate Partners	Online form
27	Daejan Investments Limited	Email
28	Defence Infrastructure Organisation (DIO)	Email
29	Derwent London	Email
30	Donise Limited trading as Al Balad Restaurant	Online form
31	DPK Limited	Email
32	Eco Cycle	Online form
33	Element Capital Management Ltd	Email and online form
34	EPIC	Email
35	Exhibition Road Cultural Group	Email and online form
36	Fenwick	Email
37	Finchatton	Email
38	FitzWest Neighbourhood Forum	Email
39	Freight Transport Association (FTA)	Email
40	Friends of Kilburn Park	Email
41	GMS Estates	Email
42	Great Portland Estates	Email
43	Grosvenor Group	Email
44	Grosvenor Mayfair Residents Association	Online form

45	Heart of London Business Alliance	Email
46	Hermes Investment Management/NatWest Trustee & Depositary Services	Email
47	Highways England	Email
48	Historic England	Email
49	Howard de Walden Estate Ltd	Email and online form
50	Hyatt International (Europe, Africa, Middle East) LLC	Online form
51	ICOMOS - UK World Heritage Committee	Email
52	Imperial College London	Email
53	Imperial College London - Healthcare NHS Trust Ltd	Email and online form
54	Individual	Online form
55	Individual	Online form
56	Individual	Online form
57	Individual	Online form
58	Individual	Online form
59	Individual	Online form
60	Individual	Online form
61	Individual	Online form
62	Individual	Online form
63	Individual	Online form
64	Individual	Online form
65	Individual	Online form
66	Individual	Online form
67	Individual	Online form
68	Individual	Online form
69	Individual	Online form
70	Individual	Online form
71	Individual	Online form
72	Individual	Online form
73	Individual	Online form
74	Individual	Email
75	Individual	Email
76	Individual	Email
77	Individual / Developer	Email
78	Innovative Aged Care Ltd	Email
79	John Lewis Partnership	Email
80	Kennedy Wilson Europe	Email
81	Knightsbridge Association	Online form
82	Knightsbridge Neighbourhood Forum	Email
83	Knightsbridge Residents Management Company Ltd	Email
84	Lambeth Council	Email
85	Landsec	Email
86	Lazari Investments Ltd	Email
87	LJE Planning Ltd	Email and online form

88	London First	Email and online form
89	London Network of Neighbourhood Planners	Email
90	London Parks & Gardens Trust	Online form
91	London School of Economics	Email
92	London Town Group of Companies Limited	Email
93	Lothbury Investment Management Limited	Email
94	M&S	Email and online form
95	Maida Hill Neighbourhood Forum	Email
96	Manex Properties Ltd	Email
97	Marble Arch London BID	Email
98	Marine Management Organisation (MMO)	Email
99	Marylebone Association	Email
100	Marylebone Cricket Club (MCC)	Email and online form
101	Marylebone Forum	Email and online form
102	Mayfair Neighbourhood Forum	Online form
103	Mayor of London	Email
104	Met Police	Email
105	Met Police - Designing Out Crime Team	Email
106	Metro Bank Plc	Email
107	Meyer Bergman	Email
108	Momentum Transport Consultancy	Email
109	Monmouth Planning Ltd	Email and online form
110	Motcomb Estates Ltd	Online form
111	National Grid	Email
112	Native	Email
113	Network Rail	Email
114	New West End Company	Email
115	NHS Property Services (NHSPS) and the Department of Health and Social Care (DHSC)	Email and online form
116	North London Waste Plan	Email
117	The Northbank BID	Email
118	Northern and Midland Holdings	Email
119	Notting Hill East Neighbourhood Forum (NHENF)	Email and online form
120	Owner of 11 Belgrave Road (key development site 29)	Email and online form
121	PaddingtonNow BID	Email
122	Palace of Westminster Restoration and Renewal Programme	Email
123	Pimlico Grid Residents' Association	Email
124	Pimlico Neighbourhood Forum	Email
125	Planning Out	Online form
126	Planning Resolution Ltd	Email and online form
127	Port of London Authority	Online form
128	Portland Village Association & W1W Tree Planting Initiative	Online form
129	Publica	Email
130	Publica Properties Limited	Email

131	Queen's Park Community Council	Email
132	RDI REIT	Email and online form
133	RIU Hotels	Email
134	Road Haulage Association (RHA)	Email
135	Rowan Jacobs Ltd	Email
136	Royal Albert Hall	Email
137	Royal London Group	Email
138	SAVE Britain's Heritage	Online form
139	Sellar Property Group	Email
140	Shaftesbury PLC	Email
141	Shaw Corporation	Email
142	Shiva Hotels	Email and online form
143	Soho Data Holdings Ltd	Email and online form
144	Soho Estates Limited	Email
145	The Soho Society	Email
146	Sport England	Online form
147	St John's Wood Society	Online form
148	St Marylebone Society	Email
149	Tachbrook Street Residents' Association	Online form
150	Taylor Wimpey Central London	Email
151	Telereal Trillium	Email
152	TfL Commercial Development	Email
153	Thames Water	Email
154	The Collective	Email and online form
155	The Crown Estate	Email
156	The Pollen Estate	Email
157	The Portman Estate	Email
158	The Royal Parks	Email
159	Theatres Trust	Email and online form
160	Transport for London (TfL)	Email
161	Travelodge Hotels	Email
162	Travis Perkins Plc	Email
163	Turley	Email
164	UKHospitality	Email
165	University of the Arts London	Email
166	Urban Innovation Company	Email
167	Victoria BID & Victoria Westminster BID	Online form
168	Victoria Gardens Development Limited	Email and online form
169	Viridian Properties Limited	Email
170	Viridis Real Estate Services Limited	Email
171	Wandsworth Borough Council	Email
172	West End of London Property Unit Trust	Email
173	West End Partnership (WEP)	Email
174	Westbourne Capital Partners Ltd	Email

175	Westminster BIDs (Baker Street Quarter Partnership / Heart of London Business Alliance / Marble Arch Partnership / New West End Company / The Northbank / PaddingtonNow / Victoria BID / Victoria Westminster BID)	Email
176	Westminster Councillor	Online form
177	Westminster Councillor	Online form
178	Westminster Cycling Campaign	Email
179	Westminster Labour group (Cllr Barraclough)	Email
180	Westminster Living Streets	Online form
181	Westminster Property Association	Email
182	Whitbread Plc	Email

Appendix 9 Letter and notice (Regulation 18, 2017)

Councillor Daniel Astaire
Cabinet Member Planning and Public Realm

Please reply to: Andrew Barry-Purcell

Direct Line / Voicemail: 020 7641 6000
Fax: 020 7641 3050
Email: planningpolicy@westminster.gov.uk

Date: 16th June 2017

Dear Sir/Madam

Revision to Westminster City Plan (November 2016)

In March 2015 the council made known that it would be making a number of separate revisions to its City Plan. We are writing to advise you that following the completion of three of these revisions in 2016 (relating to basements, mixed use, special policy areas/policies map) and a change in Leadership and key Cabinet Member positions at the council, the council now intends to carry out a full review of the entire plan. This will include incorporation and updating of policies currently "saved" from the Unitary Development Plan (2007).

This is an opportunity to reconsider the strategic vision and objectives and the direction the plan should take on a number of important areas. It also provides an opportunity to update figures and projections and progress remaining and previously consulted upon changes as a single comprehensive revision to the plan. This revision will result in a single local plan providing a strategic planning policy framework for the City of Westminster for the period to 2035.

This revision will be known as the 'Westminster City Plan Full Revision'. The city council intends that it will result in a local plan by the third quarter of 2018. **This notice of intention to revise the adopted plan, Westminster's City Plan (November 2016), is being made in accordance with Regulation 18 of the Town & Country Planning (Local Planning)(England) Regulations 2012.**

Once this revision has been made, the new document will be the 'local plan' for Westminster and will replace all current policies in the adopted Westminster's City Plan and saved policies in the Unitary Development Plan. Detailed information about this revision is set out in Westminster's Local Development Scheme which can be viewed at www.westminster.gov.uk/local-development-scheme.

In summary, the scope of the **Westminster City Plan Full Revision** will be to renew the council's planning policy agenda, in line with the council's City for All vision. This will entail a full review of all policies in Westminster's City Plan (November 2016) and the "saved" UDP policies with a particular focus on (but not limited to):

- **A renewed vision and strategic objectives.**
- **Increasing overall housing targets and the delivery of affordable housing** on site, and, where appropriate, off site; in preference to a payment in lieu, through changes to the affordable housing policy cascade; changes to the calculation of payment in lieu; changes to policy relating

to 'super-size' residential units; reviewing the use of affordable housing credits, introducing policies on affordable rent, tenure mix, amending the split between intermediate and social housing to 60:40, introducing post-permission reviews of viability where larger schemes are not providing policy-consistent levels of affordable housing, and to enable families to remain in Westminster, with the use of s106 prioritised for meeting housing need.

- **A focus on joint work across the public sector to make the most efficient use of land assets ('One Public Estate')**
- **Reconsideration of existing policy designations;** including 'Core and Wider Central Activities Zone (CAZ)' and the 'West End Special Retail Policy Area', and the way these relate to Westminster's and the Mayor's CAZ; the introduction of a new 'West End' designation; potential changes to the North Westminster Economic Development Area; separate policy treatment of the Church Street/Edgware Road and other housing renewal areas; changes to reflect the wider role of St. John's Wood as a centre for leisure and recreation, and consequent changes to other designations.
- **Changes and simplification of policies adopted as part of the Mixed Use revision.** In particular this will involve:
 - the removal of policy S1 3A which introduces a 30% commercial uplift 'allowance' without providing residential floorspace, in the Core CAZ.
 - Changes to policy S1 3B which allows a 30% commercial uplift 'discount' for proposals involving an increase in floor space of 30-50%
 - A change of approach to Mixed Use credits, and a greater emphasis on delivery of housing on site (see above).
 - Amendment of the cascade at Policy S1 3C
 - Changes and simplifications to the supporting text.
- **Changes to business and employment policies** with increased support or employment through policies which focus on the provision of a range of workspace, support for the digital economy and job opportunities for Westminster residents.
- **Changes to policy S20 Offices and other B1 floorspace** policy to encourage a range of types of floorspace, without detriment to the delivery of affordable housing.
- **A review of retail policies to include the addition of an exception to policy S21 Retail** in respect of development which provides for a better mix of uses, or more unique uses and to clarify policy related to A2 uses following the council's Article 4 direction in respect of A1 to A2 uses.
- **Review of policies on the night-time economy and, in particular, the concept and policy wording of the existing 'Stress Areas'** to reflect a more positive approach to the evening and night time economy, a possible relaxation of the policy restrictions on entertainment uses, combined with a stricter requirement to contribute to a reduction in cumulative impact in the currently named stress areas.
- **Clarification on the policy position on tall and higher buildings,** guided by the outcomes of the 'Building Height – Getting the Right Kind of Growth for Westminster' consultation and to include a review of local views in policy S26.
- **A review of the uses protected by the St. James's Special Policy Area,** in particular private members' clubs.
- **A review of all 'design' policies, including potential for minor amendments and simplification to the basements policy.**
- **An update of policy S29 Health, Safety and Well-being,**
- **A review of policy S34 Social and Community infrastructure,** in particular the necessity for continued protection of these uses on large development sites.
- **A review of all transport policies including removal of references in policy S41 'Pedestrian Movement and Sustainable Transport'** to reducing the reliance on private motor vehicles and single person motor vehicle trips, and introduction of wording to ensure development does not impede traffic flow and vehicle movement.

- **Specifying which principles and parts of the plan should be taken into account in the preparation of neighbourhood plans.**

This Full Revision will also include those areas previously the subject of a series of informal consultation booklets, published between October 2013 and March 2015 (and not already covered by the three revisions made in 2016). As such the Full Revision will also include policies relating to the following areas:

- Town centres and retail, including street markets
- Commercial and West End.
- Environmental policies (e.g. energy and waste)

The Full Revision will also:

- Provide greater detail to those policies in the City Plan and ensure that development accords with the objectives set out in the City Plan and is consistent with national policies and those emerging from preparation of the London Plan and other Mayoral strategies.
- Revise the adopted Westminster's City Plan (November 2016) and Policies Map as appropriate
- Ensure policies are presented in a way that is clear, concise, and user-friendly.

As the Full Revision will incorporate all remaining "saved" Unitary Development Plan policies, <https://www.westminster.gov.uk/unitary-development-plan-udp> , the Unitary Development Plan (Jan 2007), will no longer form part of the statutory development plan for Westminster from adoption of the revised local plan.

If you have any comments on the Westminster City Plan Full Revision please send them in writing by 28th July 2017 to planningpolicy@westminster.gov.uk or by post to Policy and Strategy, Westminster City Council, 6th Floor, 5 The Strand, London WC2N 5HR. For more information, please call 020 7641 6000.

Further information is available on the City Council's website at www.westminster.gov.uk/revision-westminsters-city-plan.

Councillor Daniel Astaire
Cabinet Member for Planning and Public Realm

City of Westminster
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Development) (England) Regulations 2004
Town and Country Planning (Local Development) (England) (Amendment) Regulations
2008
Town and Country Planning (Local Planning) (England) Regulations 2012

Notice of Revision to Westminster's City Plan Development Plan Document

Westminster City Council intends to make a revision to the adopted Westminster's City Plan (November 2016). The City Council will now be undertaking a full plan revision as follows:

1. Full Revision to Westminster's City Plan

This notice is being made in accordance with Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012.

Once this revision has been made, the new document will be the Local Plan for Westminster and will replace all current policies in the Unitary Development Plan. Detailed information about this revision is set out in Westminster's Local Development Scheme which can be viewed at www.westminster.gov.uk/local-development-scheme.

You are invited to let us know what matters and/or policies you think these revisions ought to contain.

If you have any comments on the revisions to Westminster's City Plan please send them in writing to planningpolicy@westminster.gov.uk or Policy and Strategy, Westminster City Council, 6th Floor, 5 Strand, London WC2N 5HR by 28th July 2017. For more information, please call 02076416000. You can also find further information on the City Council's website at www.westminster.gov.uk/revision-westminsters-city-plan.

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- that any or all of the revisions have been submitted to the Secretary of State for independent examination under section 20 of the above Act,
- the publication of the recommendations of any person appointed to carry out an independent examination of any or all of the revisions, and
- the adoption of any or all of the revisions.

Julia Corkey
Director of Policy, Performance and Communications
16th June 2017

Appendix 10 Website (Regulation 18, 2017)

Notification of consultation on new City Plan (in accordance with Regulation 18)

Following the completion of a number of separate revisions to the Westminster City Plan (in respect of basements, mixed use, special policy areas and the policies map) and the change in leadership and key Cabinet Member positions at Westminster, the council now intends to undertake a full review of the entire plan. This provides an opportunity to renew the council's planning policy agenda, in line with its City for All vision. It will reconsider the strategic vision, objectives, and the direction that the plan should take on a number of important areas, as well as updating facts and figures, and progressing all remaining and previously consulted upon changes as part of a single comprehensive revision, which incorporates and updates policies currently 'saved' from the Unitary Development Plan (2007).

[We are seeking views on what the 'Westminster City Plan Full Revision' should include.](#) ¹ This consultation runs from 16 June to 28 July 2017.

Once this revision has been made, it will be the 'local plan' for Westminster, and will replace all current policies in the adopted Westminster's City Plan, and saved policies in the Unitary Development Plan. Detailed information about the programme and proposed contents of this revision is set out in Westminster's [Local Development Scheme](#) ².

If you have any comments on the Westminster City Plan Full Revision please send them in writing by 28 July to planningpolicy@westminster.gov.uk or by post to Policy and Strategy, 6th Floor Westminster City Council, 5 Strand, London, WC2N 5HR.

A revised timetable has also been published on 16 June to take account of this change. This replaces the previous timetable published in March 2015. [View the new timetable](#) ³.

The council has also made a number of related [Article 4 Directions](#) to remove permitted development rights.

To be notified of future consultations, please email planningpolicy@westminster.gov.uk so we can add you to our consultation database

Other relevant links

[Information on Westminster's planning policies](#)
[Westminster's City Plan](#)
[Unitary Development Plan \(UDP\)](#)
[Community Infrastructure Levy](#)
[Planning guidance to support policies](#)

Appendix 11 Respondee (Regulation 18, 2017)

ID	Name	Type of Consultee
1	The Westminster BIDs	BIDS
2	Victoria BID	BIDS
3	Heart of London	BIDS
4	Westminster Cycling Campaign	Campaign Groups
5	Westminster Cycling Campaign	Campaign Groups
6	Clean Air in London	Campaign Groups
7	British Beer & Pub Association (BBPA)	Campaign Groups
8	Land Securities	Developers, Landowners and Property Companies
9	Westminster Real Estate Ltd	Developers, Landowners and Property Companies
10	Westminster Property Association (WPA)	Developers, Landowners and Property Companies
11	Shaftesbury PLC	Developers, Landowners and Property Companies
12	McKay Securities	Developers, Landowners and Property Companies
13	Universities Superannuation Scheme (USS)	Developers, Landowners and Property Companies
14	Carter Victoria Limited C/O Telson Capital	Developers, Landowners and Property Companies
15	Businesses or business groups	Developers, Landowners and Property Companies
16	The Society of London Art Dealers and The British Antique Dealers Association	Developers, Landowners and Property Companies
17	Theatres Trust	Developers, Landowners and Property Companies
18	Metro Bank	Developers, Landowners and Property Companies
19	Travis Perkins	Developers, Landowners and Property Companies
20	BBPA	
21	Barny Evans	Individuals
22	James Broughton	Individuals
23	Alan Lee	Individuals
24	Daniel Jaeggi	Individuals
25	Rich Clarke	Individuals
26	Alexander Jenkins	Individuals
27	Colin Baker	Individuals

2 8	David Coffey	Individuals
2 9	Pimlico Neighbourhood Forum	Neighbourhood Forums and Amenity Societies
3 0	Knightsbridge Neighbourhood Forum	Neighbourhood Forums and Amenity Societies
3 1	Marylebone Forum and Marylebone Association	Neighbourhood Forums and Amenity Societies
3 2	Belgravia Society	Neighbourhood Forums and Amenity Societies
3 3	Royal Borough of Kensington & Chelsea	Neighbouring Boroughs
3 4	City of London Corporation	Neighbouring Boroughs
3 5	Wandsworth Council	Neighbouring Boroughs
3 6	Defence Infrastructure Organisations	Public Sector Landowners
3 7	Imperial College NHS Healthcare Trust	Public Sector Landowners
3 8	TfL Commercial Development Planning Team	Public Sector Landowners
3 9	Network Rail	Public Sector Landowners
4 0	NHS Property Services	Public Sector Landowners
4 1	Kings College London	Public Sector Landowners
4 2	Church Commissioners for England	Public Sector Landowners
4 3	Natural England	Statutory Consultees
4 4	Environment Agency	Statutory Consultees
4 5	Sport England	Statutory Consultees
4 6	Canal & River Trust	Statutory Consultees
4 7	London Parks & Gardens Trust	Statutory Consultees
4 8	Capital Growth	Statutory Consultees
4 9	Historic England	Statutory Consultees
5 0	Mayor of London	Statutory Consultees
5 1	Transport for London (TfL)	Statutory Consultees

Appendix 12 Research findings (Tall and High buildings consultation, 2017)

In 2017 the Council undertook three consultations on the 'right kind of growth' to gauge public opinion on tall and higher buildings.

Throughout the consultation, the council made the following distinction:

- 'Higher' buildings were defined as being a few storeys higher than buildings in their immediate surroundings.
- 'Tall' buildings were defined as those being experienced as tall and are significantly taller than buildings in their surroundings.

Summary of the results

- The majority of participants in the consultation perceive as a tall building as either 10 storeys or more or if the building is higher than surrounding buildings.
- Most consultees considered that tall buildings should be for mixed use combining residential and commercial spaces and those that do not agree with mixed use are much more likely to opt for commercial as opposed to residential use.
- With regards to tenure within tall residential buildings almost a third said that a mixture of different tenures would be appropriate for 'tall' buildings in London. One in five said that tall buildings should be used for social housing. The levels of support for Solely private residential tall buildings received the lowest support. A survey undertaken across London on this matter revealed slightly different results - there was much greater emphasis on tall buildings being used for social housing.
- Whether tall buildings should play a role in solving the housing crisis received mixed feedback – one survey revealed two thirds opposing this approach, whereas in other surveys, the majority of respondents either supported it or had no opinion either way.
- Across all three surveys, the overall findings show that no overall majority supports increasing the number of tall buildings in Westminster or using new tall buildings to solve the housing crisis in Westminster. However, in two of the surveys, a large minority support this initiative.
- Opinions were divided as to whether the three Opportunity Areas should continue to accommodate tall buildings.
- The majority of consultees agreed that there was scope to add a few storeys to some existing buildings in the city.
- When asked about the top factors for development of tall buildings the following factors were considered the most important:
 - excellent design, high quality materials, how it looks in relation to its surroundings.
 - the impact the building has on the immediate feel of an area.
 - the impact on the skyline and whether the building is affecting any important views.
 - whether it improves and/or adds public space at ground level.
 - protection of the historic character and local distinctiveness of Westminster.
 - whether it is environmentally friendly/energy efficient/sustainable.

Appendix 13 Responses per booklet (Informal booklets consultation, 2013-2015)

Booklet	Key issue	Number of key responses
1	Housing need, delivery and quality	18 responses
2	Flood risk	8 responses
3	Basements	86 responses
4	Mayfair and St James's	258 responses
5	Food, drink, entertainment, arts and culture	39 responses
6	Westminster's economy	19 responses
7	Social and community uses	13 responses
8	Design	22 responses
9	Health, well-being and personal safety	13 responses
10	Open space and green infrastructure	17 responses
11	Planning and pollution control	13 responses
12	Public realm and advertisements	18 responses
13	Transport and movement	28 responses
14	Energy	10 responses
15	Heritage, views and tall buildings	23 responses
16	Spatial policy and implementation	34 responses
17	Affordable housing	10 responses
18	Mixed use and office to residential conversion	33 responses
19	West End	18 responses

Appendix 14 Respondee (Informal booklets consultation, 2013-2015)

Name
Adam Price
Ahmad Al Hussein
Alan Wippermans and Co
Alpha Plus Group
Andrew Francis
Ashley Gardens Residents' Association
Baker Street Quarter Partnership
Barbara Jacquesson
Barbara Richards
Berkeley Group
Bidwells
Bouygues Development London Newcastle consortium
BREEAM Communities
Bridget Rennie
British Land
British Sign and Graphics Association
Campaign for Real Ale
Canal & River Trust
Capco
Capital and Counties
CGCA
Church Commissioners
Church Street Ward Neighbourhood Forum
City of London Corporation
Clear Channel UK Ltd
Clivedale Ventures Ltd
Councillor JP Floru
Covent Garden Area Trust
Covent Garden Community Association
Covent Garden Residents' Association
CPT UK
Dolphin Living
Donise Limited
DP9
Dr Jacqui Wilkinson
Dr Sheila D'Souza
Duncan Sankey
Eccleston Square Residents
English Heritage
Environment Agency
Estates Ltd
Farshid Moussavi

Fenwick
Fitzrovia West Neighbourhood Forum
Fuad Suzali
Gary Hayes
Gerald Higgs
Geraldine Wong-smith and Mark Smith
Graham Timms
Great Western Developments Ltd
Greater London Authority
Grolux Investments Ltd
Grosvenor
GVA
Harrowby and District Residents Association
Heart of London Business Alliance
Highways Agency
Hilson Moran
Historic England
Howard de Walden Estate
Hussein Hakim
Imperial College NHS Trust
International Student House
John Lewis Partnership
Karen Scarborough
Land Securities
Langham Estate
Leonard Specterman
Liberal Democrats of Westminster and the City of London
Linda McHugh
Living Streets
M. Paget
Marine Management Organisation
Martha Gott-Sankey
Marylebone Association
Marylebone Cricket Club
Marylebone Society
Mayfair Residents Group
Meyer Bergman
Michael Jeans
MOL & TFL
Motcomb Estates
Moudid Hamze Fatoush Express/Restaurant
Mr Moufid Hamze
Murad Qureshi
Natural England
Nature Conservancy
New West End Company

Nick Brindley
Nicky Foy
Nimax Theatres
The Northbank BID
NWEC
Office of Rail Regulation (ORR)
Outdoor media Centre
Paddington Now
Paddington Waterways
Parliamentary Estates Directorate
Pimlico Grid Residents' Association
PIP
Pocket
Premises Management
Ptolemy Dean Architects Ltd
Queens Road W2 Ltd
Quod
Redrow London
Renew Planning
Rupert Owen
Sara Duncan
Shaftesbury PLC
Soho Create
Soho Society
St Marylebone Society
Star Street Resident's Association
Tate Gallery
Taylor Wimpey
Tesstuto Interiors Ltd
Thames Water
The Berkeley Group
The Board of Trustees of the Tate Gallery
The Burlington Arms
The Crown Estate
The Howard de Walden Estate
The Portman Estate
The Revd Dr Adam Scott OBE TD
The Royal Academy of Arts
The Royal Opera
The Theatre's Trust
Theatres Trust
Tom Price
Triborough Public Health Department
Turley Associates
UK Screen Association
Valentino Restaurant

Verina Glaessner
Victoria BID
Westminster Advice Forum
Westminster Cycling Campaign
Westminster Property Association

CITY PLAN

2019 – 2040



City of Westminster