



Document title: WCC response to question Q6 in “Appointed Inspectors Note 1 to Council Westminster Local Plan” (code INSP1)

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This document has been produced in order to respond to question Q6 in the “Appointed Inspectors Note 1 to Council Westminster Local Plan” (code INSP1):

“We therefore ask the Council to review its Schedule of modifications, separating out the proposed minor and Main Modifications and to provide clear justification for each MM based on the tests of soundness.”.

Having considered all the Regulation 19 consultation comments received, the council recommended the Planning Inspectors to consider a series of proposed Minor Modifications to the draft text; these are detailed in the submission document CORE_002 “Schedule of proposed minor modifications to the Regulation 19 publication draft City Plan” (November 2019). The council believed these modifications did not materially affect the substance of the plan, its overall soundness or the submitted sustainability appraisal. The modifications relate to points of clarification, factual updates and typographical or grammatical errors.

Following the Inspector’s question in their initial letter (INSP1), the council has reassessed the implications and justification of each proposed Minor Modification.

The results of the assessment are shown in the following table. The council still considers that most of the modifications are Minor Modifications and therefore do not require further consultation. We have, however, identified a number of proposed modifications that the Inspectors may consider as “Main” rather than “Minor”. When we have reclassified a modification to “Main”, we have explained under which test of soundness it may be considered “Main” and have drafted a short justification.

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes
Introduction						
M/I/01	How to use this plan, page 4	While each of the policies hold equal weight, particular attention should be paid to Policy 7. As this policy is concerned with neighbourly development and primarily managing amenity impacts, it is important to read this policy alongside all other policies in the Plan when determining impacts and potential mitigation on these sites.	For clarity that all policies have equal weight	Minor		
M/I/02	Foreword, page 3	Greener living must inform the choices we make – sometimes literally. Soft landscaping and streets lined with trees, bring natural beauty and mitigate against the harmful effects of CO ₂ <u>to help achieve our carbon neutral ambition.</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
Context						
M/Cx/01	Timeline, page 9	2020/21 49 Elizabeth Line Crossrail due to open	Correction	Minor		
M/Cx/02	Timeline, page 9	Add <u>Crossrail 2</u>	Correction	Minor		
M/Cx/03	Purple infographic, page 21	<u>3 4 passenger River bus</u> terminals	Correction	Minor		

M/Cx/04	Paragraph 2, page 20	The structure of our city is also a major contributor to CO2 emissions. In the UK, buildings are responsible for around 40% of CO2 emissions. In Westminster that figure is more than double at around 90%. This not only wastes energy but amplifies the Urban Heat Island affect. <u>In September 2019 the City Council declared a Climate Emergency and set an ambitious target for Westminster to be carbon neutral by 2040 – ten years in advance of Government and Mayor of London targets. This target will inform everything we do as we strive to meet the challenges of climate change and deliver a carbon neutral city. cont...</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
M/Cx/05	Our Approach, page 22	Climate change is changing the way we do things. Design will prioritise sustainable construction materials, with energy-efficiency on an equal footing as aesthetic appeal. We will be a world leader in sustainable design <u>and zero carbon development. cont...</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
M/Cx/06	Our Approach, page 23	Over the course of the next 20 years Westminster's air quality will improve dramatically, <u>and our CO₂ emissions will be near zero.</u>	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
Objectives						
M/O/01	Objective 10	Make the most of our unique heritage <u>and historic environment, through its conservation and enhancement; while and encouraging world class new buildings which sensitively integrate with the historic environment</u>	For clarity that what we mean by 'make the most of our heritage'	Minor		

		innovations in building technology and improving sense of place.	includes conserving it and in response to representation from Historic England.			
M/O/02	Objective 6	Improve quality of life, climate resilience and tackle environmental challenges by <u>encouraging innovations in building technology and</u> protecting, enhancing, expanding our valuable network of parks and open spaces.	For clarity, and in response to representation from Historic England, moved from Objective 10, as this more clearly related to Objective 6.	Minor		
Spatial Strategy Policies						
M/S/01	Chapter introduction, Page 28	To respond to our growth we need to develop; the challenge is to <u>optimise</u> maximise our limited space	For consistency with other policies in the plan regarding appropriate development	Minor		
M/S/02	Policy 1 A 2	Delivering <u>at least</u> 22,222 homes, <u>of which at least with</u> 35% <u>will be of new homes as</u> affordable”	For clarity and in response to representations from Shaw Corporation.	Minor		
M/S/03	Policy 1 A 7	Protecting and enhancing the city's unrivalled heritage assets <u>(including their settings)</u> , and townscape value	For completeness and in response to representations	Minor		

			from Historic England.			
M/S/04	Policy 1 B	Growth will <u>primarily</u> be delivered through the:	For clarity and in response to representations from the Church Commissioners for England.	Main	a) Positively prepared	This modification clarifies that the plan does not restrict growth outside of key growth areas.
M/S/05	Para 1.5	The affordable housing target will ensure that <u>in addition to meeting the demands from the private housing market</u> , delivery <u>also</u> meets identified need in the affordable sector <u>and conforms with the Mayor's strategic target of 50% affordable housing across all of London. as well as demand from the market</u>	For clarity that the policy is in general conformity with the London Plan and in response to representations from the GLA and the Cathedral Area Residents Group.	Main	c) Effective	This modification clarifies that the approach to affordable housing is in line with the London Plan.
M/S/06	Para 1.8	As the heart of a world city, Westminster's portion of the CAZ includes the functions of monarchy and government, a variety of cultural, educational, professional and religious institutions, world class retail, headquarters of national and international businesses, embassies, <u>high quality hotels</u> , leisure and entertainment.	For completeness and in response to representations from 4C Hotel Group.	Minor		
M/S/07	Figure 7 Key Diagram	<i>Amendment to extent of Paddington Opportunity Area, Victoria Opportunity Area and West End Retail and Leisure Special Policy Area boundaries as shown in section</i>	See Section 3.2 and 3.3 of the Schedule of Changes to the Policies Map	Minor		

		<i>3.2 and 3.3 of the Schedule of Changes to the Policies Map (November 2019)</i>	(November 2019)			
M/S/08	Para 2.10	This activity will help ensure <u>a balanced and well managed</u> the evening and night-time economy <u>that</u> is not dominated by the consumption of alcohol, which can lead to issues of anti-social behaviour and deter those who do not drink from visiting central London outside of the daytime.	For completeness and in response to representations from Longmartin Properties and Shaftesbury Plc.	Minor		
M/S/09	Sub-heading above para 2.11	Freight and servicing <u>and the public realm.</u>	Correction and in response to representations from WPA.	Minor		
M/S/10	Policy 3 F	Enhanced job opportunities and <u>community</u> facilities for the residents of <u>Paddington and</u> the neighbouring areas of Church Street and the NWEDA.	For clarity and in response to representations from NHS London Healthy Urban Development Unit/Central London and West London Clinical Commissioning Groups.	Minor		

M/S/11	Para 3.8	<u>The three key development sites within the area have the potential to contribute significantly to the delivery of the policy priorities.</u> Paddington station is a key development site within the area with has capacity for expanded transport provision <u>and improved modal interchange</u> and, improved permeability and legibility, and a mix of commercial uses. Two other key development sites remain in the area. cont...	For completeness and in response to representations from Travis Perkins.	Minor		
M/S/12	Policy 4 C	Improve ments to <u>and</u> integration between public transport modes.	For clarity and in response to representations from Network Rail, Victoria BID and Victoria Westminster BID, Victoria Gardens Development Ltd/Stockley House, Landsec, Grosvenor, WPA.	Minor		
M/S/13	Figure 10	<i>Amend map - see Submission Policies Map and the Schedule of Changes to the Policies Map.</i>	Correction in response to representations from Thane Freehold, Cathedral Area Residents Group (CARG), Diana C C Colvin	Minor		

			(individual), Thorney Island Society, Graeme Cottam, Belgravia Society.			
M/S/14	Para 4.6	The area contains a significant number of larger and taller buildings which are primarily located along the key routes of Buckingham Palace Road, Vauxhall Bridge Road and Victoria Street. Victoria is also home to a significant number of heritage assets, including <u>several conservation areas</u> , the Grade II Listed station, Grade I listed Westminster Cathedral and is in close proximity to the Royal Parks, the Thames and the Westminster World Heritage Site.	For completeness and in response to representations from Pimlico Neighbourhood Forum.	Minor		
M/S/15	Para 4.8	The area also lacks a coherent sense of place and of urban quality. Visual clutter and the absence of <u>many</u> key landmarks add to this.	For clarity and in response to representations from Graeme Cottam.	Minor		
M/S/16	Para 4.10	A number of key development sites exist within the Victoria Station environs, which Victoria Station represents a key opportunity to achieve our targets deliver our priorities for the area; <u>including an improved transport provision, modal integration, public realm and local environmental quality, and act as a catalyst for further development. The presence of other key development sites within the station's environs, provides scope to while</u> ensuring a coordinated approach to development is taken to integrate sites	In response to representations from Network Rail, Victoria BID and Victoria Westminster BID, Victoria Gardens Development Ltd/Stockley House, Landsec,	Minor		

		together and deliver successful places designed around people. <i>cont...</i>	Grosvenor, WPA.			
M/S/17	Para 5.4	<p>The canal is a significant underutilised asset that offers opportunities to provide an attractive walking and cycling environment – both to job opportunities in nearby Paddington, <u>the Kensal Area</u> and Old Oak Common, and to high quality open space at Regent's Park.</p> <p>...We will work with TfL and the Canal & Rivers Trust to facilitate the Paddington to West Drayton Quietway.</p>	In response to representations from RBKC and Canal & River Trust.	Minor		
M/S/18	Para 5.5	<p>...The development of key sites at Harrow Road/Elmfield Way and at Westbourne Park Bus Garage among others over the plan period will <u>deliver a mix of uses including housing</u>, will help to improve pedestrian permeability and provide better connections both within and beyond the NWEDA as well as delivering the land use priorities of the NWEDA...</p>	For completeness and in response to representations from NHS.	Minor		
M/S/19	Para 6.7	<p>...There will also be improved facilities for Church Street Market, including a new layout, higher quality public realm, <u>and</u> parking and storage facilities <u>for traders</u>.</p>	For clarity.	Minor		

M/S/20	Policy 7 A	Protecting and where appropriate enhancing amenity, by <u>normally</u> preventing unacceptable impacts in terms material losses of daylight and sunlight, <u>and preventing significant increases in</u> sense of enclosure, overshadowing, <u>loss of</u> privacy and overlooking.	Correction in response to representations from Whitbread, John Lewis Partnership, 4C Hotel Group, Church Commissioners, Grosvenor and WPA.	Main	c) Effective	This modification materially affects the application of the policy.
M/S/21	Policy 7 D	<u>Ensuring that sufficient local infrastructure is provided to support growth.</u> Not overburdening the capacity of local infrastructure.	For clarity in response to representations from Shaftesbury and NHS London Healthy Urban Development Unit/ Central London and West London Clinical Commissioning Groups.	Minor		
M/S/22	Para 7.1	Westminster is already densely developed. As the city grows, detrimental impacts on existing users of the area must be avoided <u>in order to protect residents' health and wellbeing.</u>	For completeness in response to representations from NHS London Healthy Urban Development Unit/ Central London and	Minor		

			West London Clinical Commissioning Groups.			
M/S/23	Para 7.2	The principles of neighbourly development contained in this policy apply to all <u>planning</u> applications.	For clarity.	Minor		
M/S/24	Para 7.3	Provision of good indoor daylight and sunlight levels is important for health and well-being and to decrease energy consumption through reduced need for artificial heating and lighting. <u>While it is acknowledged that it may not always be possible to meet standards set out in the Building Research Establishment (BRE) Guidelines¹ due to the specific constraints of each site, the Guidelines will be used as a starting point to assess proposals.</u> <u>New footnote 1 'Site layout planning for daylight and sunlight' (1991) Building Research Establishment (BRE)</u>	For clarity in response to representations from Throphaeum Asset Management, 4C Hotel Group, Land Securities, GIA Chartered Surveyors, Marks & Spencer PLC, Capco Capital & Counties and The Portman Estate	Minor		
M/S/25	Para 7.3 (last sentence)	Even when there may be no material loss of daylight or sunlight, new developments should prevent <u>unacceptable significant adverse</u> increases in the sense of enclosure.	For clarity.	Minor		
M/S/26	Para 7.4	Polluted air, excessive smells, noise and strong vibrations are examples of environmental impacts <u>associated with the operation of development</u> that have an adverse impact on quality of life and health and well-being.	For clarity.	Minor		

M/S/27	Para 7.7	Development must therefore protect and <u>where appropriate</u> enhance the green infrastructure in the city. <i>cont...</i>	For clarity in response to representations from Shaftesbury.	Minor		
Housing Policies						
M/H/01	Policy 8 C	All existing residential <u>units</u> , uses, floorspace and land will be protected, except where:	For clarity	Minor		
M/H/02	New para 8.10	<u>Existing Housing</u> <u>The high cost of land in Westminster and its limited availability mean that all existing housing uses must be protected. The acute shortage of affordable housing and the continued need to provide for family-sized homes mean that the only exceptions where the loss of residential uses or floorspace may be acceptable is where they are being reconfigured to better meet these needs. Where existing supported or affordable housing is being reconfigured or redeveloped it will be assessed against the latest evidence of need, either through the council's Annual Affordable Housing Statement or up-to-date evidence specific to Westminster.</u>	For clarity on the application of the policy and in response to representations from the Mayor of London and Maida Hill Neighbourhood Forum.	Minor		

M/H/03	New para 8.11	<u>To help meet the continued need for family sized housing in Westminster, the council will allow the some loss of one existing non-family sized housing home where this is being reconfigured or merged with another to provide larger units (de-conversion), provided other options to extend the building to create larger units have first been explored. Properties that are de-converted to create family-sized homes should not exceed the 200sq m maximum unless it is demonstrably impracticable to do so.</u>	For clarity and in response to representations from Mayor of London.	Main	c) Effective	This modification changes how the policy operates by clearly setting out how loss of existing residential will be assessed and improves its effectiveness as a result.
M/H/04	Para 8.10	<u>Re-numbered to Para 8.12</u>	Correction.	Minor		
M/H/05	Policy 9 H	The council will maximise provision of additional affordable housing through renewal of its housing assets, particularly in designated housing renewal areas. Proposals for re-provision of existing affordable housing will be at an equivalent or better quality than existing and will maximise the amount of affordable housing floorspace. Proposals involving the demolition of existing affordable housing will not be permitted unless it is replaced by at least an equivalent amount of affordable housing floorspace. Additional affordable housing will be maximised in such redevelopment proposals.	For clarity and in response to representations from the Mayor of London.	Minor	d) Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.

M/H/06	Policy 9.1	...The shortage of land, its high price and current funding mechanisms mean that to exceed the strategic 35% affordable housing target threshold and contribute to the Mayor's strategic target of 50% affordable homes across London , it is essential to require affordable housing contributions from private housing developments. <u>All major developments are therefore expected to provide at least 35% of new homes as affordable housing.</u> Developments which fall short of provision of 35%-this requirement will be subject to post-permission viability assessment and reviews <u>in line with the Mayor's threshold approach to viability.</u>	For clarity that the policy is in general conformity with the London Plan in response to representations from the Mayor of London.	Main	d) Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/07	Para 9.2	To maintain our stock, where affordable homes are redeveloped <u>at least an equivalent amount of affordable housing floorspace must be re-provided. We will seek an uplift in the amount of affordable housing provided where existing affordable housing is redeveloped as part of mixed tenure or mixed-use schemes. Such proposals will be expected to submit a viability assessment to maximise the amount of additional affordable housing provided.</u> ‡ There will be no overall net loss of floorspace and re-provision must be in the vicinity of the original home(s) to maintain mixed tenure communities...	For clarity and in response to representations from the Mayor of London.	Main	d) Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.

M/H/08	Para 9.3	All affordable housing requirements from residential development will be calculated based on the total gross residential floor space development proposed (Gross Internal Area). <u>All developments that include the re-development of affordable housing will be assessed in line with the Mayor's threshold approach to viability. On estate regeneration schemes we will maximise the amount of affordable housing, seeking to deliver 50% affordable housing on public land where viable. On these schemes, T</u> to facilitate large-scale estate renewal and deliver mixed communities, better quality homes and a more appropriate mix of unit sizes, on estate renewal schemes the 35% affordable housing requirement will apply across the regenerated estate, taking account of any affordable homes that have been re-provided. <i>cont...</i>	For clarity that the policy is in general conformity with the London Plan in response to representations from the Mayor of London.	Main	d) Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/09	Policy 10 B	<u>With the exception of the international centres, w</u> here affordable housing units are required <u>rather than a payment in lieu</u> , these should be delivered on-site, unless it is demonstrably impracticable or unviable to do so.	For clarity and to align with Economy policies.	Minor		
M/H/10	Para 10.2	A mixed use policy was first introduced into Westminster's planning framework through our Unitary Development Plan (<u>2001997</u>) in response to an imbalance in the delivery of commercial and residential floorspace in the CAZ. <i>cont...</i>	Correction.	Minor		

M/H/11	Para 10.5	To simplify what has become a very complicated policy approach, to encourage a balance between competing uses and to ensure that affordable housing is delivered in the CAZ, the policy now requires office and hotel developments above certain size thresholds, <u>including changes of use,</u> to contribute to the delivery of affordable housing, either through payments in lieu or on-site delivery. Off-site provision of affordable housing is therefore only to be considered in exceptional circumstances <u>where issues of viability or the practicality of on-site delivery cannot be overcome,</u> to ensure that affordable housing is delivered on-site as much as possible where it is <u>practical and</u> viable to do so, and thereby achieve mixed communities.	For clarity and in response to representations from the development industry on the challenges of on-site delivery.	Main	c) Effective	This modification changes the operation of the policy by softening the on-site approach in some circumstances. This will improve the effectiveness of the policy.
M/H/12	Para 10.9	...Where off-site provision is deemed acceptable, applicants will need to demonstrate that they can provide more and higher quality units than would have been possible on-site, for example, through provision of larger units that will better meet identified need, or through provision of more amenity space or better access to a range of transport options. <u>Land use swaps may be an acceptable mechanism for achieving this where they are considered appropriate.</u>	For clarity and in response to representations from the development industry on the challenges of on-site delivery.	Minor		

M/H/13	Policy 11 B	New build homes will be designed with growing families in mind and 25% of all new homes <u>across Westminster</u> will be family sized.	For clarity that the family-sized housing requirement is strategic and to demonstrate general conformity with the new London Plan.	Main	b) Justified	This changes the meaning of the policy to show that 25% is a strategic target. The evidence for a strategic target is fully justified.
M/H/14	Policy 11 D	The council supports the provision of well-managed new housing which meets an identified specialist housing need. All existing specialist and supported housing floorspace which meets a specific local housing need will be protected from changing to non-specialist or supported residential use except where it is demonstrated that:	For clarity	Minor		
M/H/15	Policy 11 D	3. it is surplus to requirements as any form of specialist or supported housing and is being replaced by affordable housing ; or	For clarity that it is possible to redevelop such sites for a mix of housing types.	Minor		
M/H/16	Policy 11 H	At least 35% <u>A proportion</u> of the purpose-built student accommodation will be secured as affordable student housing accommodation as defined in <u>accordance with</u> the London Plan. All accommodation should include a proportion of units that are adaptable to meet specialist needs.	For clarity and to demonstrate general conformity with new London Plan Policy H17.	Main	d) Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/17	Policy 11 J	Permission for g <u>G</u> ypsy and traveller sites may be granted-permitted where it is demonstrated that there is a need in Westminster and that they are well-appropriately designed developments that	For clarity and to improve wording.	Minor		

		<u>and</u> will not have adverse-unacceptable impacts, <u>particularly</u> on traffic or parking.				
M/H/18	Para 11.1	Westminster has a broad range of housing needs and we support delivery of a range of housing types and sizes to meet those needs. <u>The provision of specialist housing and accommodation will contribute to the council's overall housing target of at least 22,222 homes over the plan period.</u>	To clarify that provision of specialist housing will contribute to the council's overall housing targets.	Minor		
M/H/19	Para 11.19	Student accommodation must be affordable, well-managed and a sufficient proportion must be adaptable to meet specialist needs. Thirty five per cent of accommodation must be provided as affordable student accommodation in line with the London Plan <u>A proportion of purpose-built student accommodation must be provided as affordable student accommodation, as defined in the London Plan and associated guidance. The Mayor's threshold approach to viability will be used to assess the appropriate proportion of affordable student accommodation in accordance with London Plan Policy H17.</u>	To demonstrate general conformity with new London Plan Policy H17.	Main	d) Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan approach.
M/H/20	Para 12.2	...This requirement may be waived if the rents charged are at a level comparable to Westminster's intermediate rent and these rental levels are secured by legal agreement in perpetuity. <u>We will expect Build to rent and large-scale purpose-built shared living schemes to follow the affordable housing requirements set out in the forthcoming Planning Obligations and Affordable Housing SPD. Until the SPD is adopted, the London Plan requirements will be followed.</u> <i>cont...</i>	For clarity and in response to representations from Unite Students.	Minor		

M/H/21	Para 13.1	Housing plays an important role in the safety, health and well-being of individuals and communities and in the shaping of <u>inclusive</u> neighbourhoods. It must therefore be designed to a high quality. This is particularly important in Westminster given the growing need for housing driving higher density developments. <u>We will expect all new developments to be tenure blind and maximise tenure integration.</u>	In response to representations from the Church Street Ward Neighbourhood Forum and Achim Von Malotki.	Minor		
M/H/22	Para 13.4	The policy requirements <u>Part A of the policy apply/applies</u> to: all new homes (across all tenures); residential extensions; when flats are being merged; or when a change of use results in new homes.	For clarity.	Minor		
M/H/23	Para 13.6	... The Nationally Described Space Standards (NDSS) are therefore adopted in Westminster and will ensure residents have access to a suitable amount of space in their <u>new self-contained</u> homes. This requirement applies to new build dwellings however it is recognised that it is often <u>sometimes impracticable to meet them within heritage assets. However, we expect the standards to be met when converting or extending homes where possible.</u>	For clarity and in response to representations from the Church Commissioners for England.	Minor		
Economy and Employment Policies						
M/EE/01	Policy 14 D	<i>Insert new clause D3:</i> <u>the proposal is for the replacement of ground floor office space within the town centre hierarchy with an A1 or complementary town centre use; or</u> <i>(renumber D3 to D4)</i>	For completeness and in response to representations from British Land, BMO Real Estate Partners,	Main	d) Consistent with national policy	This modification clarifies a range of town centre uses are acceptable in the town centre hierarchy in accordance with the NPPF.

			and WPA representations.			
M/EE/02	Para 14.11	Given past levels of loss, and the national <u>importance, international and London significance</u> of the central London's office market, the further <u>net</u> loss of <u>total</u> office floorspace from the CAZ will be resisted.	For completeness and in response to representations from the Mayor of London.	Main	c) Effective	This modification clarifies that policy resists an overall net loss of office floorspace from the CAZ - recognising criteria within the policy offers scope for some loss from individual sites in certain circumstances.
M/EE/03	Policy 15 D	In addition to clause C above, proposals for the permanent change of use of a <u>ground floor</u> A1 retail unit will be supported by evidence that there is no reasonable prospect of its continued use for A1 retail purposes, as evidenced by appropriate marketing of at least 18 months. This includes proposals involving the sub-division and loss of <u>ground floor</u> A1 floorspace, but not the inclusion of subsidiary uses within an A1 store as part of a diversified offer. <i>cont...</i>	For clarity and in response to representations from Crown Estate, NWE, and Bentall Greenoak.	Main	a) Positively prepared	This modification ensures plan is not overly onerous on change of use proposals beyond ground floor and is therefore positively prepared in supporting growth and development opportunities.

M/EE/04	Para 15.3	GLA forecasts based on a range of scenarios indicate that despite the growing use of online shopping and increased space efficiency within stores, over the period from 2015 to 2041, there will be a need for between 375,468 <u>284,693</u> sq m and 467,811 <u>399,021</u> sq m (net) additional comparison retail floorspace in Westminster, assuming base expenditure levels continue. Over the Plan period, this equates to 229,944 – 322,286 sqm.	Correction to reflect evidence base.	Minor		
M/EE/05	Para 15.7	In some instances, this could necessitate the loss of some existing A1 floorspace - particularly such as from the upper floors of multi-level stores, <u>but possibly also from the ground floor where retail remains the dominant function.</u>	For clarity and in response to representations from Crown Estate and the Mayor of London.	Minor		
M/EE/06	Para 15.12	The permanent change of use of an A1 retail unit, including or proposals to sub-divide <u>an existing unit to provide an alternative use, it</u> and lose a subsequent standalone A1 unit will require marketing evidence demonstrating that continued retail use is no longer viable.	For clarity and in response to representations from Carter Jonas.	Minor		
M/EE/07	Figure 15	<i>Amend map - see Submission Policies Map and the Schedule of Changes to the Policies Map.</i>	Correction in response to representations from Covent Garden Community Association, Longmartin Properties, Berners Allsop Estate, and	Minor		

			Baker St Quarter Partnership.			
M/EE/08	Para 16.3	There are many parts of the city that have a distinct cultural focus or present a more localised cultural offer. These include Soho for film and visual effects, Church Street for art and antiques, and Covent Garden for street entertainment. <u>The city also has a high concentration of theatres, music venues and LGBTQI+ venues.</u> cont... <u>New footnote: GLA Cultural Infrastructure Map - https://maps.london.gov.uk/cim/index.html.</u>	For completeness and in response to representations from the Mayor of London.	Minor		
M/EE/09	Para 16.4	... In the Knightsbridge SCA a concentration of institutions of international importance includes the Royal Albert Hall, the Serpentine Gallery, <u>Imperial College</u> , the Royal College of Art and the Royal College of Music.	For completeness and in response to representations from Imperial College.	Minor		
M/EE/10	Para 17.5	<u>Although the public health risks of alcohol consumption are recognised,</u> P public houses can play an important role as social hubs at the heart of communities, add to the diversity of commercial areas, and make a positive contribution towards townscape and local identity. cont...	For completeness and in response to representations from the NHS HUDU / CCGs.	Minor		
M/EE/11	Para 17.6	... These include venues aimed at specific communities (such as LGBTQI+), the decline of which we seek to halt through the introduction of this policy and by working in partnership with community groups,	Typo.	Minor		

		landlords, the Mayor of London and other partners.				
M/EE/12	Para 18.1	Community infrastructure and facilities consist of: — Health facilities e.g. hospitals, GP surgeries. — Education facilities e.g. schools, nurseries, universities and colleges. — Sports and leisure facilities e.g. leisure centres, swimming pools, outdoor playing pitches and fields and Multi-Use Games Areas.	For completeness and in response to representation from Sport England.	Minor		
M/EE/13	Para 18.2	New Footnote: See Sport England guidance on making the best use of school facilities www.sportengland.org/useourschool/	For completeness and in response to representation from Sport England.	Minor		
M/EE/14	Para 18.8	There may be cases where there is no continued need or demand for the provision of community facilities. Where this may be the case, the <u>Where a community facility is identified as surplus to requirements via a strategy published by the council* (or alternative needs assessment accepted by the council as more up to date and robust),</u> early marketing of vacant community floorspace to assist in identifying any alternative occupiers who could make a good public service use of the site is strongly encouraged. <i>cont...</i>	For clarity and in response to representation from Sport England.	Minor		

		<u>*New footnote: Such as the council's Playing Pitch and Built Facilities strategies</u>				
M/EE/15	Policy 19 D 1	financial contributions towards employment, education and skills initiatives <u>from residential and commercial schemes</u> ; and	For clarity and in response to representations from Imperial College London.	Main	b) Justified	This modification ensures policy is justified in seeking financial contribution that are not overly onerous.
M/EE/16	Policy 21 B	...small and medium enterprise (SME) workspace, particularly in the creative sectors <u>industries</u> ;	To align with glossary, in response to representations from the Soho Society.	Minor		
M/EE/17	Para 21.4	It is important to maintain the mix of uses present in Soho to protect local character. This policy aims to promote a range of uses that reflect Soho's cosmopolitan and diverse <u>varied</u> nature. <u>Soho has a diverse range of retailers, many of which form specialist clusters within the area, such as: fashion and tailoring; music and the arts; food; and those catering to the LGBTQI+ community.</u>	For completeness.	Minor		
M/EE/18	Para 21.7	...Larger floorplate units are generally at odds with Soho's existing scale and grain. <u>We consider small-scale hotels, in a Soho context, to be those of fewer than 100 rooms.</u>	For clarity.	Minor		
M/EE/19	Para 22 B	Additional floorspace for use as art galleries and antique trading is supported in principle within both SPAs. The net loss of gallery floorspace from either SPA <u>for a use other than antique trading</u> will be resisted.	For clarity and in response to representations from the Pollen Estate.	Main	b) Justified	This modification ensures policy is not overly onerous in restricting uses that are identified as being

						fundamental to the areas character.
Connections Policies						
M/C/01	Policy 25 C 5	Major development should provide or financially contribute towards creating well-connected, high-quality, convenient, safe cycle infrastructure and routes.	For clarity and in response to representations from Transport for London.	Main	d) Consistent with national policy	This modification expands the application of the policy to all types of infrastructure/routes, not just those for cycling.
M/C/02	Para 25.7	There is a wider need to deliver a sustainable future network by recognising that as central London grows the transport network will need to be developed in a manner that meets the demands of the majority in terms of encouraging more use of active travel options, like walking and cycling along with use of the bus (<u>including river buses</u>), underground and national rail networks.	For completeness and in response to representations from Port of London Authority.	Minor		
M/C/03	Policy 26 B 2	Contribute towards improved legibility and wayfinding including signage to key infrastructure, transport nodes, green spaces, <u>the Thames Path</u> and canal towpaths (such as through TfL's Legible London).	For completeness and in response to representations from Port of London Authority.	Minor		

M/C/04	Para 26.11	...However, pressure from competing uses, <u>priority to deliver public realm improvements</u> , high PTAL values across the city and the limited space on offer within Westminster's fine grain urban environment mean that provision of short stay cycle spaces will <u>may</u> not always be appropriate...	For clarity and in response to representations from Mayor of London and Transport for London.	Minor		
M/C/05	Para 27.2	... Improvements to routes to and from public transport nodes (bus stops and stations) are critical in <u>ensuring that facilities can maintain or improve passenger experience and in</u> persuading more people to use buses and trains.	For clarity and in response to representations from Transport for London.	Minor		
M/C/06	Policy 27 C 1	...make a financial contribution towards improvements to the public realm which facilitates improvements to the operation of the <u>all sustainable transport modes bus network and associated infrastructure</u> ;	Correction.	Main	d) Consistent with national policy	This modification widens the application of the policy beyond bus transport alone.
M/C/07	Policy 27 C 2	support car clubs, cycle hire facilities and other sustainable transport initiatives, such as electric vehicle charging infrastructure where they do not detrimentally impact upon public realm improvements and pocket parks; and	Correction.	Minor		
M/C/08	Para 28.8	—A central principle of the emerging City Plan is to encourage mixed and sustainable communities and a demographic imbalance exists within Westminster in terms of the proportion of families living in the city. Cars provide a method of convenient transportation and release from the stress of living in central London. This is particularly relevant for young families where the cost of public transport and the logistical implications of using these forms of travel can be a prohibiting factor for many	In response to representations from Transport for London, Mayor of London and various resident groups.	Minor		

		families moving to and staying in Westminster.				
M/C/09	Policy 29 A	Given the increasing demands on existing highway space, the council will resist the loss of highway land <u>particularly footways</u> . In cases involving the setting back of buildings, the council will seek to ensure <u>the designation of</u> resulting frontage land is designated as highway.	For clarity and in response to representations from Transport for London and Church Commissioners for England.	Minor		
M/C/10	Policy 29 B	New highway accesses should minimise the amount of <u>footway, cycling space and</u> kerb space lost for parking and / or servicing and should ensure no loss of street furniture	For clarity and in response to representations.	Minor		
M/C/11	Para 30.9	<i>Move this paragraph to sit as supporting text for policy 26 (new para 26.13)</i>	Moved to a more appropriate location.	Minor		
M/C/12	Para 31.5	... New or replacement facilities will be directed to accessible locations on the strategic road network (TLRN or WSRN). As these routes still include sensitive land uses, impact on local amenity <u>and groundwater</u> will be considered through appraisals such as noise, and air quality and <u>land contamination</u> assessments.	In response to representations from the Environment Agency.	Minor		
M/C/13	Policy 32 D	In assessing development proposals affecting Westminster's waterways and waterbodies, the council will have regard to the Thames River Basin Management Plan, <u>the Thames Vision</u> , the Marine Policy Statement and the emerging South East Marine Plan.	For completeness and in response to representations from Port of London Authority.	Minor		

M/C/14	Policy 32 G	Proposals for permanent moorings on the River Thames will:	For completeness and in response to representations from the Environment Agency.	Main	a) Positively prepared	This modification adds to the policy, giving full consideration to all factors relating to flood risk and management of the Thames foreshore
		1. enhance the character and appearance of the riverside and be open to the public;				
		2. not compromise views of the river, the World Heritage Site and other heritage assets and their settings; and				
		3. not hinder navigation or jeopardise the long-term use of pier recesses;:-				
		<u>4. Not compromise the integrity of the River Thames flood defences; and</u>				
		<u>5. Not negatively impact the intertidal foreshore and, where necessary, provide appropriate mitigation measures.</u>				
M/C/15	Para 32.7	Development that encroaches over or into waterways will normally be resisted due to impacts on openness, unless it demonstrates overriding strategic benefits such as water quality improvements (such as the Thames Tideway), enhanced flood defences, or increased river transportation. <u>Development in the south east marine plan area in the tidal Thames may need a licence from the Marine Management Organisation (MMO).</u>	For completeness and in response to representations from the Marine Management Organisation.	Minor		
M/C/16	Para 32.9	Enhanced pier provision in the right locations can help broaden the choice of transport modes <u>(including for small scale freight and the movement of construction waste)</u> and reduce congestion elsewhere, particularly where it is well linked to public transport, pedestrian and cycle routes....	For completeness.	Minor		

M/C/17	Para 32.10	... Permanent moorings on the River Thames therefore need careful management to protect the character of the river, including its views and as part of the setting to important heritage assets, <u>to manage flood risk</u> , to protect its role as a continuous wildlife corridor and to avoid impeding river navigation.	For clarity and in response to representations from the Environment Agency.	Minor		
Environment Policies						
M/E/01	Chapter introduction, page 126	For the past two decades Westminster has been designated an Air Quality Management Area, and reducing our CO2 emissions <u>remains achieving a carbon neutral city is now</u> a top priority.	To reflect carbon reduction targets adopted by the council in September 2019.	Minor		
M/E/02	Policy 34 A	The council will make sure that quality of life, and <u>being of existing and future occupiers</u> , and the natural environment are not adversely affected by harmful pollutants and other negative impacts on the local environment.	In response to representations from Thames Water and to correct a typo.	Minor		
M/E/03	Para 33.4	All other major developments should not make air quality worse and are encouraged to achieve an overall improvement to air quality. The Air Quality Neutral <u>minimum</u> requirement also applies to developments incorporating Solid Biomass Boilers and CHP due to the potential impact of these technologies on air quality.	For clarity and in response to representations from Knightsbridge Neighbourhood Forum.	Minor		

M/E/04	Para 34.8	... In order to ensure that occupiers or users are not exposed to health risks and environmental impact is avoided (e.g. on soil, watercourses or waterbodies) the history of the land uses need to be identified and if required used as a basis for any proposed remediation measures. <u>Applicants should follow the council's Contaminated Land Guidance for Developers and adhere to relevant guidance published by the Environment Agency.</u>	In response to representations from the Environment Agency.	Minor		
M/E/05	Policy 35 G	<u>Developments should achieve biodiversity net gain, wherever feasible and appropriate.</u> Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. <i>cont...</i>	In response to representations from the Environment Agency.	Main	d) Consistent with national policy	Strengthening of policy approach to ensure that the approach is in line with national policy
M/E/06	Para 36.4a (new para)	<u>In addition, sleeping accommodation below modelled breach level in areas identified at risk of flooding will not be supported in the event of a breach in Thames tidal flood defences, as set out in Environment Agency guidance.</u>	In response to representations from the Environment Agency.	Minor		
M/E/07	Policy 36 G	G. All existing flood management infrastructure will be protected, including access for maintenance. <u>Wherever possible, an undeveloped buffer zone of 16m around flood defences should be maintained.</u>	For clarity and in response to representations from the Environment Agency.	Main	c) Effective	Strengthens the policy approach.
M/E/08	Policy 36 H	Improvements to flood defences will be secured through planning conditions and / or legal agreements where the size, type and / or location of development impacts on flood risk. <u>Development should not limit future raisings of flood defences.</u>	For clarity and in response to representations from the Environment Agency.	Main	c) Effective	Strengthens the policy approach.

M/E/09	Para 36.6	36.6 The Thames Estuary 2100 Plan (TE2100) is the strategic flood management plan for London and the Thames Estuary. Its primary focus is tidal flooding, and Westminster is located in the London City Zone. We will work with our partners to make sure the Thames Flood Defences remain strong and the recommendations of the TE2100 Plan are implemented. We will also continue to work with partners to support the timely implementation of the Thames Tideway Tunnel including the combined sewer outflows in the city. <u>We may use conditions to ensure necessary water or sewerage network upgrades.</u>	In response to representations from Thames Water.	Minor		
M/E/10	Policy 38 D	<u>Developers are required to demonstrate through the Site Environment Management Plan and associated Site Waste Management Plan, the recycling, re-use, and responsible disposal of Construction, Demolition and Excavation waste in adherence with the council's Code of Construction Practice.</u>	For completeness and in response to representations from NLWP.	Main	c) Effective	Strengthens the policy approach.
M/E/11	Policy 38 E	<u>The council will continue to collaborate with other London Local Authorities in the management of its waste apportionment target and monitor its arisings and capacity requirements.</u>	In response to representation from the Mayor of London and NLWP.	Main	c) Effective	Strengthens the policy approach.

M/E/12	Para 38.2	<p>Our strategic focus is on waste reduction and recycling in the city. In accordance with <u>the Government's emerging Resource and Waste Strategy and the Mayor's draft London Plan, these policies and strategies along with the NPPW, associated planning guidance and the Waste Management Plan for England commit the council to move waste up the waste hierarchy.</u> We are committed to ensuring that waste is managed appropriately and efficiently in the city Recent evidence⁷ has shown that Westminster has no capacity for new strategic waste management facilities and we will therefore protect existing waste management facilities and we will continue to monitor and research opportunities for new sites in Westminster.</p> <p>We will work with local partners and other London boroughs to make arrangements to pool the waste apportionments set by the London Plan to meet our strategic waste planning duties.</p>	For completeness and in response to representations from NLWP.	Minor		
M/E/13	Para 38.3	<p>Developments should provide adequate waste management facilities that are fully integrated into the design of the scheme. <u>The council's Recycle and Waste Storage Requirements guide - Apr 2019, provides applicants with guidance on how it expects this to be done including the installation of balers and compactors within the development as required. This also supports the requirements for</u> tThe amalgamation of facilities in an area may be required in locations that demand an area specific approach to waste management. <i>cont...</i></p>	For completeness.	Minor		

M/E/14	New para 38.4	<u>The Government revoked the Site Waste Management Plan Regulations 2008 requiring a site waste management plan (SWMP) for construction projects costing greater than £300,000 (exc VAT). However, given the very significant amounts of construction and associated CDE waste generated in the borough, the council continues to require production of an SWMP for such projects and for all basement developments as specified in its CoCP which includes management of CDE waste, both through on-site recycling and re-use and on-site waste processing prior to disposal.</u>	For completeness.	Minor		
M/E/15	Para 38.2	<p><i>Re-number para 38.5:</i></p> <p>We will continue to work with local partners and other London boroughs and the GLA to make formalise current arrangements to pool the council's waste apportionment set by the London Plan to meet our strategic waste planning duties. <u>The council will shortly be carrying out a Waste Data Study to provide an understanding of the profile of the borough's waste arisings and capacity required to inform apportionment pooling. To date, the council has been managing the majority of its waste via facilities in Southwark, Lewisham and Greenwich - rolling tonnage of 160ktps, already 84% of the Draft London Plan's apportionment. The council also uses facilities within Hammersmith and Fulham/OPDC area and understands that this site will be redeveloped for residential and commercial at some point in the future. Along</u></p>	For completeness to reflect our evidence base and in response to representations from the Mayor of London and NLWP.	Minor		

		<u>with other London boroughs using this facility, the council will collaborate to address the resultant capacity shortfall.</u>				
M/E/16	New para 38.6	<u>Agricultural waste is composted in the City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of London Corporation provides a Hazardous Waste Collection and Disposal Service, HWCDS, to London residents in all London Boroughs (except of Hillingdon). Waste water treatment is addressed by Thames Water through the upgrade and expansion of the Beckton Sewage Treatment Works as part of the Thames Tideway Tunnel scheme and there is little or no waste arising from low level radioactive so no additional facilities are required for these waste streams.</u>	To reflect evidence base.	Minor		
Design and Heritage Policies						
M/DH/01	Policy 39 B	<p>All development will positively contribute and respond to Westminster's townscape and streetscape <u>including having regard to:</u></p> <p>i. the character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them <u>and</u></p> <p>ii. the pattern and grain of existing streets, squares, mews and passageways <i>(part I split into two points)</i></p>	For clarity and in response to representation from Historic England.	Minor		
M/DH/02	Policy 39 B 3	" ... the form, character, ecological and <u>heritage</u> value of parks, gardens and open spaces".	For clarity and in response to representation	Minor		

			from Historic England.			
M/DH/03	Policy 39 D 3	SUSTAINABLE DESIGN	For completeness and in response to representation from the Environment Agency.	Main	d) Consistent with national policy	To further align the policy with national and London policy.
		Development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design, including:				
		i. use of high-quality durable materials and detail;				
		ii. providing flexible, high quality floorspace;				
		iii. optimising resource <u>and water</u> efficiency.				
M/DH/04	Policy 39 E	Applicants will demonstrate how sustainable design principles and measures have been incorporated into designs, utilising environmental performance standards as follows:	For clarity.	Minor		
		i. Non- domestic residential developments of 500 sq m (<u>GIA</u>) of floorspace or above will achieve at least BREEAM “Excellent” or equivalent standard.				
		ii. <u>Residential c</u> onversions and extensions of 500 sq m (<u>GIA</u>) of residential floorspace or above, or five or more dwellings will aim to achieve “Excellent” in BREEAM domestic refurbishment.				
M/DH/05	Para 39.2	These qualities underpin the city’s attractiveness as a place to live, work and visit and contribute to a high quality of life for everyone. <u>To achieve our growth targets sustainably, we expect a design-led approach which will optimise capacity of sites in the</u>	For clarity and in response to representations.	Minor		

		<u>most appropriate way, based on an understanding of context.</u>				
M/DH/06	Para 39.3	We will prepare supplementary guidance on the application of this and the other design <u>and heritage</u> policies.	For clarity and in response to representations.	Minor		
M/DH/07	Para 39.9	... This may include strategic design considerations, such as the orientation of buildings and spaces, design of façades to capitalise on solar gain, whilst minimising risks of overheating and other measures, for example incorporation of green infrastructure, and flood resilience <u>and sustainable drainage</u> measures. <i>cont...</i>	For completeness and in response to representation from the Environment Agency.	Minor		
M/DH/08	Para 39.10	All development should ensure the reduction, reuse or recycling of resources and materials, <u>including water and waste</u> and minimise energy use and emissions that contribute to climate change.	For completeness and in response to representations.	Minor		
M/DH/09	Para 39.10	... All development should ensure the reduction, reuse or recycling of resources and material and minimise energy use and emissions that contribute to climate change. <u>As Westminster falls within an area classified as “seriously” water stressed, developments proposals should maximise water efficiency. Residential proposals should meet the optional water efficiency requirement set out in Part G of the Building Regulations (110 litres/person/day), in line with the London Plan.</u>	For completeness and in response to representation from the Environment Agency.	Main	d) Consistent with national policy	Sets a new standard in line with national and London policy.
M/DH/10	Para 39.11	Finally e Consideration should also be given to how buildings and spaces will be managed by either private or public owners and managers,	Correction.	Minor		

		to ensure they remain of high quality over the lifetime of the development.				
M/DH/11	Para 39.12	BREEAM (Building Research Establishment's Environmental Assessment Method) is the most commonly used methodology for assessing, rating and certifying the sustainable design and construction of buildings. Applicants will demonstrate how they will meet BREEAM or equivalent standards set out above .	Correction (equivalent standards are not set out above).	Minor		
M/DH/12	Policy 40 D	Development will protect the <u>skyline, prominence and iconic</u> silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance <u>identified significant</u> views out of, across and towards the World Heritage Site.	For clarity and in response to representations.	Minor		
M/DH/13	Policy 40 E	The council will work with partners to promote the use, management and interpretation of the site in ways that protect, enhance and better communicate its OUV. <u>The council will commit to lead the production and review of an updated World Heritage Site Management plan.</u>	In response to representation from Historic England.	Minor		
M/DH/14	Policy 40 F	Applicants will be required to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed, <u>informed by</u> Heritage Impact Assessment methodology <u>and that any harm, including cumulative harm, has been avoided or justified.</u>	For clarity and in response to representations.	Minor		

M/DH/15	Policy 40 K	Development will preserve or enhance the character and appearance of conservation areas, <u>retaining features that contribute positively to their significance</u> and protecting their settings Features that contribute positively to the significance of conservation areas will be retained and Opportunities will be taken to enhance them <u>conservation areas</u> and their settings, wherever possible.	Grammatical correction and for clarity.	Minor		
M/DH/16	Policy 40 Q	Proposals affecting Westminster's historic parks, gardens and open spaces will safeguard their <u>special</u> historic <u>interest</u> , integrity, character and appearance, and protect their settings and significant views from and towards these spaces.	For clarity and in response to representation from Historic England.	Minor		
M/DH/17	Para 40.1	Given its immense contribution to the character, economy and quality of life of our city, it is vital that the historic environment is valued, maintained, and refurbished in ways appropriate to its significance <u>and as an integral part of good growth</u> .	For clarity on what we mean by 'good growth'.	Minor		
M/DH/18	Para 40.4	As a designated heritage asset of international importance, it is of the highest level of significance and must be afforded the highest level of protection and maximum weight possible in the planning process. <u>Development beyond the designated boundary but within the setting of the site can also affect its OUV. Its setting is not precisely defined.</u>	For clarity and in response to representation from Historic England.	Minor		

M/DH/19	Para 40.5	Where development will affect the site or its setting, applicants should <u>will be required</u> to demonstrate proposals will conserve, enhance or better reveal its OUV. Sufficient information should <u>will</u> be provided to demonstrate impacts have been considered. and D depending on the scale and nature of proposals, <u>in addition to the heritage statement</u> , this should include a Heritage Impact Assessment using the methodology set out by ICOMOS. <i>cont...</i>	For clarity and in response to representation from Historic England.	Minor		
M/DH/20	Para 40.6	A number of significant projects will affect the World Heritage Site during the Plan period, in particular the Restoration and Renewal of the Palace of Westminster. We will work with partner organisations to ensure potential for the positive contribution of such projects to the conservation, enhancement and communication of OUV of the site <u>and its setting</u> is realised. Enhancements to the spaces within and immediately adjacent to the site, including improvements to public realm, approaches <u>and ceremonial routes</u> to the site, security measures and visitor experience will be encouraged and initiated where possible.	For clarity and in response to representation from Historic England.	Minor		
M/DH/21	Para 40.6	We will support production of conservation management plans for the Palace of Westminster and Westminster Abbey to ensure the protection of the key buildings within the site and are will lead <u>working</u> with the steering group to update the management plan for the site. which is a key tool for the long-term sustainable management of the site and its setting.	For clarity and in response to representation from Historic England.	Minor		

M/DH/22	Para 40.11	The total or substantial demolition <u>of listed buildings</u> which will result in substantial harm will only be considered where exceptional circumstances have been demonstrated, as set out <u>in the tests</u> in the National Planning Policy Framework (NPPF).	For clarity of the Plan's consistency with the NPPF	Minor		
M/DH/23	Para 40.16	In some circumstances, demolition behind retained facades can provide a way to protect facades of townscape merit while allowing new accommodation to be developed behind this and may be acceptable where the overall integrity of unlisted buildings is maintained in street views <u>retaining side or rear elevations or roofscapes of townscape value. In all cases, we will only allow demolition where proposals for the future redevelopment of the site have been approved and their implementation assured by planning condition or agreement, to avoid harmful gaps occurring within the townscape as a result of empty plots.</u>	For clarity and in response to representation from Historic England.	Minor		
M/DH/24	Para 40.26	Changes to <u>Development or proposals</u> affecting the layout, design, character, use and function of historic parks and gardens should retain and enhance their significance <u>and should not prejudice their future restoration.</u>	For clarity and in response to representation from Historic England.	Minor		
M/DH/25	Policy 41 D	Alterations and extensions will respect the character of the existing and adjoining buildings, avoid adverse visual and amenity impacts and will not obscure important architectural features or disrupt any uniformity, patterns, rhythms or groupings of buildings <u>and spaces</u> that contribute positively to Westminster's distinctive townscape	For clarity and in response to representations.	Minor		

M/DH/26	Policy 41 E & F	<p>In predominantly residential areas an additional roof storey will be permitted where this adds new residential floorspace to an existing unit or creates a new self-contained residential unit. Roof extensions should and fulfils one of the following criteria:</p> <p>1. the application site forms part of a terrace or group where a variety of roof additions or alterations create an established mixed pattern and further development of a similar form would not cause additional harm or would help to unify a group of buildings and townscape; or</p> <p>2. in the case of a terrace or group of unlisted buildings which has an existing roof line unimpaired by extensions, the development would take a coordinated approach, adding roof extensions of consistent and appropriate design to each property within the complete terrace or group; or</p> <p>3. in other locations where the proposed roof form is of appropriate design, sympathetic to the architectural character of the building and does not cause harm to amenity or heritage assets.</p> <p>F On residential buildings or in predominantly residential areas an additional roof storey will be permitted supported in principle where this adds new residential floorspace to an existing unit or creates a new self-contained residential unit and meets one of the following criteria <u>in Part E</u>.</p>	For clarity and in response to representation.	Main	a) Positively prepared	To clarify approach and its application to both residential and commercial buildings and ensure we are positively planning for growth across the city.
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M/DH/27	Policy 41 F & G	<p>F & G Within the Opportunity Areas, in the International Centres of the West End and Knightsbridge and the Major Centre, and in other commercial locations on the Transport for London and Strategic Road networks, upwards extensions of one or more storeys which create additional commercial floorspace will be permitted on-unlisted buildings, provided they are of appropriate and high quality design, do not impact adversely on heritage assets and incorporate setbacks to minimise visibility from street level, where appropriate. In all other cases other than those listed in F & G proposals for upwards extensions will be assessed using the criteria in clause D of the policy permitted where they fulfil the criteria in part E.</p> <p><i>(F&G merged)</i></p>	For clarity and in response to representations.	Main	a) Positively prepared	To clarify approach and its application to both residential and commercial buildings and ensure we are positively planning for growth across the city.
M/DH/28	Para 41.7	Care should always be taken not to disfigure buildings or upset their proportions <u>and to ensure good standards of amenity as set out in Policy 7.</u>	For clarity	Minor		
M/DH/29	Para 41.11	However, we will consider applications which would take a coordinated approach, adding roof extensions of consistent design to a complete terrace or group of unlisted buildings with a uniform roofline. <u>In such cases we will require extensions across the whole terrace group to be implemented at one time and this may be secured by legal agreement.</u>	For clarity.	Main	c) Effective	Introduces a new requirement in the application of the policy.
M/DH/30	Para 41.12	While one additional storey will usually be most appropriate, larger extensions of more than one storey may be appropriate in certain	For clarity and in response to representations.	Minor		

		locations, <u>particularly in commercial locations with more varied townscape character.</u>				
M/DH/31	Para 41.12	More than one storey of commercial floor space may also be permitted in smaller retail centres including district centres and CAZ town clusters or other commercial locations where it can be demonstrated that they meet the criteria in clause F will be sympathetic to age and character of the building and townscape.	Correction.	Minor		
M/DH/32	Para 41.17	Recognising the national importance of Westminster's heritage and townscape, we have also identified certain 'metropolitan views' of major landmarks and the most significant river views and areas of townscape in the city. The council will publish a list of views of metropolitan importance and prepare guidance on their management. <u>World Heritage Site views will be identified in the Management Plan. cont...</u>	For completeness and in response to representations.	Minor		
M/DH/33	Policy 42 A	<u>Tall buildings are defined as buildings of twice the prevailing context height or higher.</u> Westminster is not generally suitable for tall buildings. Developments significantly higher than their surroundings will need to demonstrate that building higher is the only way to make the most efficient use of the site.	For clarity and in response to representations.	Main	b) Justified	Strengthens of policy approach to align further with evidence base.
M/DH/34	Policy 42 B	Buildings of more than 30 metres, or those that are more than twice the prevailing context height (whichever is lower) will be considered to be tall buildings, and will therefore Any tall building proposals will need to satisfy both the general principles in clause D and relevant locational principles in clauses	For clarity and in response to representations.	Minor		

		E and F (and for Housing Renewal Areas, Policy 43).				
M/DH/35	Policy 42 C	Buildings that do not meet the definition of a tall building but are higher than their surroundings should positively respond to prevailing context heights and local character and may be subject to <u>the general principles in</u> clauses D, E and F of this policy (and for Housing Renewal Areas, Policy 43).	For clarity and in response to representations.	Minor		
M/DH/36	Para 42.8	... Any deviation from the identified height ranges must be robustly justified by demonstrating the general principles in this policy have been met <u>and taking into account any exceptional public benefits in full</u> <u><i>New footnote: Exceptional public benefits will be considered on a case by case basis, but should be beyond policy compliance) and applicants must demonstrate that these cannot be met otherwise into account.</i></u>	For clarity and in response to representations.	Main	a) Positively prepared	Clarifying the policy approach, supporting sustainable development.
M/DH/37	Policy 43 A	Delivering large scale public estate regeneration comes with <u>unique</u> viability challenges that are different to private developments , such as decanting of existing residents and a higher affordable housing requirement. <i>cont...</i>	For clarity and in response to representations.	Minor		
M/DH/38	Para 44.6	The installation of <u>high quality and durable</u> seating will be encouraged where appropriate and where it adds to the peaceful enjoyment of the public realm.	For clarity and in response to a representation	Minor		

M/DH/39	Para 46.3	... A site-specific Flood Risk Assessment (FRA) will be required for basement developments. Measures to be incorporated may include Sustainable Drainage Systems (SuDS) and positive pumped devices or equivalent to address sewerage flooding, or <u>and</u> other measures recommended in the FRA.	In response to representations by Thames Water.	Minor		
Implementation and Monitoring						
M/IM/01	Land use swaps, Page 174	... Therefore, a system of land use swaps may be appropriate in some circumstances to enable better development outcomes. Within the Savile Row Special Policy Area land use swaps will be considered where it can be demonstrated that the proposal will result in at least equal quantity and greater quality provision of bespoke tailoring floorspace.	For clarity that land use swaps are acceptable in principle across the city.	Minor		
M/IM/02	Monitoring Framework KPI 5 (Trigger for review)	<u>Trend in Net</u> reduction in floorspace	In response to representations.	Minor		
M/IM/03	Monitoring Framework KPI 2 (Trigger for review)	Total number of new affordable homes does not meet target after five <u>three</u> years.	For consistency with KPI 1.	Minor		
M/IM/04	Monitoring Framework KPI 25	<u>Production of updated Management Plan as 'living document' with regular review mechanism and Removal of the World Heritage Site from the annual reporting requirements of the World Heritage Committee</u>	In response to representations.	Minor		

M/IM/05	Monitoring Framework KPI 33	Reduction of NOx and carbon dioxide emissions , and particulate matter (PM2.5 and PM10) concentration against national and regional Air Quality targets.	Correction.	Minor		
M/IM/06	New KPI 38	<u>Reduction of carbon dioxide emissions (total end user and per capita) by local authority area, as reported by Department of Business Environment and Industrial Strategy (BEIS)</u>	Correction and for completeness.	Minor		
M/IM/07	New KPI 39	<u>Number of family sized homes delivered</u>	For completeness.	Minor		
Appendix 1: Key Development Sites						
M/A1/01	'Key designations' column title, page 180	<u>New footnote: Only key heritage designations have been identified, a comprehensive list of relevant heritage assets will be identified in the Site Allocations DPD.</u>	For completeness	Minor		
M/A1/02	First paragraph, page 180	It also includes residential sites which propose more than 50 units and housing renewal sites and indicative housing numbers <u>which are intended to guide the appropriate scale of development proposals but do not represent a minimum or maximum figure for the site. More detail on the Key Development Sites will be set out in the forthcoming Site Allocations DPD.</u>	For completeness.	Minor		
M/A1/03	Site 1 - Notes	...Comprehensive development of the site is supported ideally through the creation of a new masterplan which recognises the site's role as a key driver for growth and a significant agent for place shaping, whilst respecting the listed building status and heritage value of a number of the incorporated blocks :- In addition to the Grade II buildings, facade retention of a number of	For clarity	Minor		

		<u>buildings should be considered a number of unlisted hospital buildings make a positive contribution to the conservation area. cont...</u>				
M/A1/04	Site 3 - Notes	Development proposals for the site should <u>consider the recommendations in response to the 2004 adopted Planning Brief. Pre application discussions took place in 2016.</u> Development <u>should would be of a lower scale than avoid creating a tunnel effect along the surrounding buildings with lower height values fronting the canal potentially increasing in height towards the Harrow Road.</u>	Correction and in response to representation from Travis Perkins.	Minor		
M/A1/05	Site 20 - Expected uses	Transport infrastructure; mixed commercial <u>and residential</u>	In response to representation from TfL Commercial Development.	Minor		
M/A1/06	Site 25 - Notes	Historical pre-application discussions have taken place. <u>The buildings make an important contribution to the character and appearance of the conservation area.</u> Retention of the existing buildings would be supported.	For clarity	Minor		
M/A1/07	Site 26- Expected uses	Residential, on-site affordable, public space, <u>a continued military function</u>	In response to representation from Defence Infrastructure Organisation.	Minor		
Appendix 3: Schedule of Strategic Policies						
M/A3/01	Policy 38 D (new clause)	<u>Strategic</u>	Following amendments to policy.	Minor		

M/A3/02	Policy 38E (new clause)	<u>Strategic</u>	Following amendments to policy.	Minor		
Glossary						
M/G/01	New Definition:	<u>Outstanding Universal Value: Cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations.</u>	For clarity and in response to representation from Historic England.	Minor		
M/G/02	Idling	Unnecessarily running a motor vehicles <u>vehicle's</u> engine when the vehicle is not in motion.	Typo.	Minor		
M/G/03	Affordable housing	Housing for sale or rent, for those whose needs are not met by the market <u>in line with the NPPF definition</u> . In Westminster this is split into 'social' and 'intermediate' types.	For clarity.	Minor		
M/G/04	New Definition	<u>Estate renewal: Regeneration of the council's affordable housing estates, conducted across a range of sites over time to facilitate large-scale estate renewal and deliver mixed communities, better quality homes and a more appropriate mix of unit sizes.</u>	For clarity.	Minor		
M/G/05	New Definition	<u>Agent of Change: The principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Similarly, any new nuisance generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.</u>	For completeness.	Minor		

M/G/06	List of strategies on page 207	<u>OSD Place Strategy & Action Plan (2019)</u>	For completeness.	Minor		
M/G/07	List of strategies on page 207	<u>Energy Strategy 2019 (emerging) Carbon Reduction Strategy 2020 (emerging)</u>	Correction.	Minor		