

15 January 2021

Westminster City Council  
Planning Policy Team  
20th floor Portland House  
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London  
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By email only

Dear Officers

## Representations to the City Plan 2019-2040 | Schedule of Main Modifications for Consultation Tate Britain, Queen Alexandra Military Hospital Site, Millbank, London

### Introduction

We write on behalf of our client, The Board of the Trustees of Tate Gallery (Tate), to make representations to Westminster City Council's ('WCC') draft City Plan 2019-2040 (the 'City Plan'), namely modification MM49, which relates to the removal and replacement of Appendix 1, detailing housing trajectory. We understand that consultation is open until 18<sup>th</sup> January on further Main Modifications to the City Plan dated November 2020.

### Background

Tate Britain is the home of British Art and a major cultural asset in South Westminster. It sits within the Millbank Conservation Area, the Central Activities Zone, the Millbank Strategic Cultural Area and the Thames Policy Area. These designations are to be carried forward from the current adopted Proposals Map, 2016.

The Queen Alexandra Military Hospital (QAMH) site, which falls within Tate's ownership and lies immediately adjacent to the main gallery, is also identified as a Key Development Site (No. 25) in the adopted Proposals Map and Appendix 1: Proposals Sites of the City Plan, 2016. This is reflective of Tate's long-term ambitions to release the QAMH site for development purposes, in support of its cultural remit and objectives.

In the Regulation 19 draft City Plan, this designation was retained, and the site was earmarked for '*residential, cultural, office and green play space*'. Tate submitted representations to the June 2019 Regulation 19 Publication Draft City Plan, endorsing the retention of the site allocation but requesting that restrictions placed on the development potential were removed. Namely, Tate requested removal of text supporting the retention of the existing buildings within the QAMH.

Tate's representations were taken on board in the subsequent modifications to the draft City Plan published in April 2020, which moved the Key Development Sites to Westminster's Housing Trajectory in Appendix 1, and stated the following with regards to QAMH:

Site	Status	Phase of Plan	Indicative no. of units	Deliverable/ developable	Notes
Queen Alexandra Military Hospital	No planning status	11-15	170	Developable	'Site is in a suitable location and has potential for a partial redevelopment. Some of the existing buildings are of historic merit and should be retained although conversion may be possible. It is in single ownership and the landowner has express interest in redeveloping the site in the longer term. The site has potential to be redeveloped for a mixed use scheme.'

Tate fully supported the flexibility the April 2020 modification provided with regards to developing the site.

However, the November 2020 Main Modifications to the draft City Plan has resulted in all references to 'Key Development Sites' – including QAMH – being removed. Under modification MM49, Appendix 1 – 'Westminster's Housing Trajectory', is now grouped by area and the revised table is described as follows:

*'The following table sets out Westminster's housing supply for years 2020-35. Deliverable sites are named where over 50 net new homes will be provided. Developable sites and locations for growth in years 6-10 and 11-15 are grouped by area. Individual developable sites will be assigned capacities through the forthcoming Site Allocations DPD.'*

**Paragraph 8.7** has been amended to read: *'Historically more than 80% of Westminster's housing delivery has come forward as windfall. Through our ~~key development sites~~ **housing trajectory** and the future production of a Site Allocations Development Plan Document we are taking a more proactive approach to planning for growth in Westminster.'*

The QAMH site is no longer referenced specifically in the City Plan or Westminster's Housing Trajectory in Appendix 1.

### Representation

We are unclear whether this latest amendment is because QAMH has been grouped with other developable sites in South Westminster, all of which are predicted to come forward in the next 11-15 years to provide 420 units, or because a full designation for QAMH will be progressed in a Site Allocations Development Plan Document (DPD), or both. Indeed, Tate wishes to reiterate that this land has always formed an important element of Tate's longer term development strategy. It is vital that its site-specific future development potential remains documented as achievable within the lifetime of the emerging City Plan.

It has been demonstrated through the Committee endorsed masterplan for the site and subsequent long-term discussions with senior WCC officers that the site could provide a meaningful quantum of residential use as part of a mixed-use scheme offering a range of public benefits, thereby contributing to WCC's housing trajectory. It is therefore important that this be formally recognised in the Development Plan. To this end, Tate would suggest that one of the following options will be considered:

1. The Site Allocations DPD Call for Sites consultation will take place in due course and will contain the development notes for QAMH as per the April 2020 draft City Plan Appendix 1 – Housing Trajectory, copied above; and/or
2. The site allocation for QAMH is captured in the Spatial Strategy Policies, for example at paragraph 1.13 which refers to the Millbank Strategic Cultural Area in which the site is located; and/or
3. The April 2020 draft City Plan Appendix 1 - Housing Trajectory is inserted back into the intend to publish version of the City Plan.

If the intention is to capture QAMH's development potential in a future Site Allocations DPD, Tate would be grateful for confirmation of this and a timeline for consultation and adoption. Tate considers that all 3 options above could be undertaken in conjunction with each other to provide a policy framework that strengthens QAMH's developable status.

If you have any questions, please contact me or [REDACTED]

Yours faithfully

[REDACTED]  
**The Planning Lab**