



18.01.2021

Kimberley West
City and Planning Policy Team Leader
Policy, Performance and Communications
Westminster City Council
6th Floor
5 Strand
London WC2N 5HR

(by email to planningpolicy@westminster.gov.uk)

Dear Kimberley,

Representation to the Westminster City Plan 2019-2040 – Main Modifications Consultation

This representation is submitted on behalf of the Houses of Parliament Restoration and Renewal Programme and the Parliamentary Estate. The submission relates to the Parliamentary Estate buildings, including the Palace of Westminster, and the Queen Elizabeth II Conference Centre.

Further to our previous representations and Hearing Statements submitted to the Examination in Public (representor ID 160 / EX117), this representation is submitted in support of the Main Modifications to the City Plan. We consider that the modifications are justified, and result in a City Plan which is sound in accordance with the National Planning Policy Framework.

Main Modification 39 (Policy 40, Westminster's Heritage)

We support the various changes in wording to Policy 40 (Heritage) which are set out in MM39, including:

- the recognition in Policy 40B that sensitive adaptations of heritage assets will need to “mitigate and adapt to climate change”. We welcome this wording as recognition that historic buildings should respond where feasible to the sustainability and climate change agenda, by seeking an appropriate balance between heritage and sustainability objectives. We therefore support the proposed modification.
- the inclusion in Policy 40D of specific protection for the “skyline, prominence and iconic silhouettes” of the Palace of Westminster and Westminster Abbey.
- the amendment to Policy 40E that commits the council to leading the production and review of an updated World Heritage Site Management Plan; and
- the addition of wording to Policy 40F that development proposals that may impact the World Heritage Site or its setting must demonstrate how any harm, including cumulative harm, has been avoided or justified.

Main Modification 34 (Policy 35, Green Infrastructure)

We support the modification to Policy 35 (Green Infrastructure) which now correctly identifies the green space in front of the Queen Elizabeth Conference Centre as private open space.



We have no further comments to raise, and consider the City Plan to provide an appropriate policy basis for development in the Borough. We therefore support the forthcoming adoption of the plan as modified.

Yours sincerely

