



<u>Document title:</u> Updated Schedule of Modifications (including amendments agreed through Statements of Common Ground) (April 2020) and following amendments to 'Minor or Main modification' assessment directed by the Inspectors

Document code: CORE\_025\_V2

## 1 Introduction

This schedule contains all modifications proposed when Westminster's City Plan 2019-2040 was submitted to the Planning Inspectorate in November 2019 consolidated with post-submission modifications. It updates and replaces submission document CORE 002.

Modifications to the Publication Draft Plan are identified as being 'Main' or 'Minor'. The Minor Modifications do not materially affect the substance of the plan, its overall soundness or the submitted sustainability appraisal. The minor modifications relate to points of clarification, factual updates and typographical or grammatical errors. The reasons for making each of the changes are clearly set out in the schedule.

Modifications proposed at submission have 'M' at the start of their reference; postsubmission modifications have 'PS' at the start of their reference. Some modifications in the table below include pre- and post-submission changes to the same paragraph. Where this is the case, the modification reference given at submission has been kept. The following format has been used to denote the modifications:

- Underlined red text = new text suggested at submission
- Strikethrough red text = text proposed for removal at submission
- <u>Underlined blue text</u> = new text suggested post-submission
- Strikethrough blue text = text proposed for removal post-submission
- Underline green text = submission modification altered post-submission
- Strikethrough green text = submission modification removed postsubmission

Modification ref	Section of plan	Proposed change	Reason for change	Minor or Main Modification	Reason (e.g. which test of soundness?)	Notes (inc. relevant Statement of Common Ground)
			duction			
PS/I/01	Introduction, Page 4, "How to use this plan", Step 2	Step 2: Consult the 'policies map' that goes with this plan. It shows where the policies apply. You can use this to find the policies that relate to your site or area of interest. The map also shows 'key development sites' and Appendix 1 provides further guidance on the types and scale of use that we expect to see on these sites.	For consistency with changes to Appendix 1 (PS/A1/01)	Main	b) justified c) effective	
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	Main	c) effective	
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 <sub>2</sub> to help achieve our carbon neutral ambition.	To reflect carbon reduction targets adopted by the council in September 2019.			
PS/I/02	Contents, page 7	Appendix 1 Key Development Sites Westminster's Housing Trajectory	For consistency with changes to Appendix 1 (PS/A1/01)	Main	b) justified c) effective	

		Co	ntext		
M/Cx/01	Timeline, page 9	open	Correction	Minor	
M/Cx/02	Timeline, page 9	Add <u>Crossrail 2</u>	Correction	Minor	
M/Cx/03	Purple infographic, page 21	3 4 passenger River bus 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. 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	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 and zero carbon development. cont	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, and our CO <sub>2</sub> emissions will be near zero.	To reflect carbon reduction targets adopted by the council in September 2019.	Minor	

		Obje	ectives			
M/O/01	Objective 10	Make the most of our unique heritage and historic environment, though its conservation and enhancement, while and encouraging world class new buildings which sensitively integrate with the historic environment innovations in building technology and improveing sense of place.	For clarity that what we mean by 'make the most of our heritage' includes conserving it and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002)
M/O/02	Objective 6	Improve quality of life, climate resilience and tackle environmental challenges by encouraging innovations in building technology and 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.			
		Spatia	l Strategy			
M/S/01	Chapter introduction, Page 28	To respond to our growth we need to develop; the challenge is to optimise 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> 22,22220,685 homes, of which at least with 35% will be of new homes as affordable"	For clarity and in response to representations from Shaw Corporation.	Main	d) Consistent with national policy	This modification clarifies that the council are aligning to the London Plan housing target.
PS/S/01	Policy 1 A 5	Protecting <u>and enhancing</u> uses of international and/or national importance, the buildings that accommodate them, and the specialist clusters of uses within the	For completeness and in response to	Main	c) Effective	Statement of Common Ground between WCC and Marylebone

		city's most distinct places.	representations by the Marylebone Cricket Club			Cricket Club (SCG_008)
M/S/03	Policy 1 A 7	Protecting and enhancing the city's unrivalled heritage assets (including their settings), and townscape value	For completeness and in response to representations from Historic England.	Main	d) Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002)
M/S/04	Policy 1 B	Growth will primarily 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.
PS/S/02	Policy 1 B 5	realisation of the <u>development</u> potential of <u>our the</u> identified <u>key development</u> sites <u>listed</u> in <del>(see</del> Appendix 1)	For consistency with changes to Appendix 1 (PS/A1/01)	Main	b) justified c)Effective	
M/S/05	Para 1.5	Like the rest of London, demand for new housing across all tenures in Westminster is very high. We have therefore set an ambitious housing target that exceeds the London Plan target in the first ten years of the Plan to deliver levels of housing consistent with the government's standard methodology for calculating housing need. The affordable housing target will ensure that in addition to meeting the demands from the private housing market, delivery also meets identified need in the affordable sector and conforms with the Mayor's strategic target of 50% affordable housing across all of London. as well as demand from the market	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 d) Consistent with national policy	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, <a href="https://doi.org/10.1001/j.j.gov/high-quality-hotels">hotels</a> , leisure and entertainment.	For completeness and in response to representations from 4C Hotel Group.			
M/S/07	Figure 7 Key Diagram	Amendment to extent of Paddington Opportunity Area, Victoria Opportunity Area and West End Retail and Leisure Special Policy Area boundaries as shown in section 3.2 and 3.3 of the Schedule of Changes to the Policies Map (November 2019)	See Section 3.2 and 3.3 of the Schedule of Changes to the Policies Map (November 2019)		b) justified c) effective	
M/S/08	Para 2.10	This activity will help ensure a balanced and well managed the evening and night-time economy that 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.			
M/S/09	Sub-heading above para 2.11	Freight and servicing and the public realm.	Correction and in response to representations from WPA.	Minor		
M/S/10	Policy 3 F	Enhanced job opportunities and community facilities for the residents of Paddington and 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.	Main	c) effective	

M/S/11	Para 3.8	The three keyA number of identified development sites within the area have the potential to contribute significantly to the delivery of the policy priorities.  Paddington station is a key development site within the area with has capacity for expanded transport provision and improved modal interchange and, improved permeability and legibility, and a mix of commercial uses. Two other key development sites remain in the area.	For completeness and in response to representations from Travis Perkins.	Main	b) justified c) effective
M/S/12	Policy 4 C	Improvedments to and 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	
PS/S/03	Paragraph 4.3	facilitate the further intensification of the Opportunity Area according to the principles of sustainable development, including through the delivery of the key development sites with potential for mixeduse intensification identified as set out in Appendix 1, and the development of Crossrail 2 safeguarded sites either alongside or after necessary infrastructure works.	For consistency with changes to Appendix 1 (PS/A1/01)		b) justified
M/S/13	Figure 10	Amend map - see Submission Policies Map and the Schedule of Changes to the Policies Map.	Correction in response to representations	Main	b) justified c) effective

			from Thane Freehold, Cathedral Area Residents Group (CARG), Diana C C Colvin (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 <a href="mailto:several conservation areas">several conservation areas</a> , 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		Statement of Common Ground between WCC and Historic England (SCG_002)
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 many key landmarks add to this.	For clarity and in response to representations from Graeme Cottam.	Minor		Modification was made in error.
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, including an improved transport provision, modal	In response to representations from Network Rail, Victoria BID and Victoria Westminster BID, Victoria Gardens Development	Main	b) justified c) effective	

		integration, public realm and local environmental quality, and act as a catalyst for further development. The presence of other key identified development sites within the station's environs, provides scope to while ensureing a coordinated approach to development is taken to integrate sites together and deliver successful places designed around people. cont	Ltd/Stockley House, Landsec, Grosvenor, WPA.			
M/S/17	Para 5.4	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, the Kensal Area and Old Oak Common, and to high quality open space at Regent's Park. We will work with TfL and the Canal & Rivers Trust to facilitate the Paddington to West Drayton Quietway.	In response to representations from RBKC and Canal & River Trust.	Minor		
M/S/18	Para 5.5	Redevelopment in the Woodfield Road area represents an opportunity to improve the pedestrian environment in this part of the NWEDA and to address the issues of severance identified above. The developments of key sites at Harrow Road/Elmfield Way and at Westbourne Park Bus Garage among others over the plan period will deliver a mix of uses including housing, 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	For completeness and in response to representations from NHS.		b) justified c) effective	
PS/S/04	Paragraph 6.4	The Edgware Road Circle & District Line station site, together with the adjacent Capital House and Griffith House, together represent a redevelopment opportunity to enable further connectivity between the	For consistency with changes to Appendix 1 (PS/A1/01)	Main	b) justified c) effective	

		Church Street / Edgware Road Housing Renewal Area, the Paddington Opportunity Area and the rest of the CAZ. They have therefore been designated as a key development site (see Appendix 1) to co-ordinate their development and ensure benefits are brought to this housing renewal area.				
M/S/19	Para 6.7	There will also be improved facilities for Church Street Market, including a new layout, higher quality public realm, and parking and storage facilities for traders.	For clarity.	Minor		
M/S/20	Policy 7 A	Protecting and where appropriate enhancing amenity, by normally preventing unacceptable impacts in terms material losses of daylight and sunlight, and preventing significant increases in sense of enclosure, overshadowing, loss of 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	Ensuring that sufficient local infrastructure is provided to support growth. 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.		c) effective	
M/S/22	Para 7.1	Westminster is already densely developed. As the city grows, detrimental impacts on existing users of the area must	For completeness in	Minor		

		be avoided in order to protect residents' health and wellbeing.	representations from NHS London Healthy Urban Development Unit/ Central London and West London Clinical Commissioning Groups.			
M/S/23	Para 7.2	The principles of neighbourly development contained in this policy apply to all planning applications.	·	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. 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.  New footnote 1 'Site layout planning for daylight and sunlight' (1991) Building Research Establishment (BRE)	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		c) effective	
M/S/25	Para 7.3 (last sentence)	Even when there may be no material loss of daylight or sunlight, new developments should prevent unacceptable significant adverse 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 associated with the operation of development that have an	For clarity.	Minor		

		adverse impact on quality of life and health and well-being.				
M/S/27	Para 7.7	Development must therefore protect and where appropriate enhance the green infrastructure in the city. cont	For clarity in response to representations from Shaftesbury.	Minor		
	•	Ho	using			
PS/H/01	Policy 8 A	The number of new homes built in Westminster will exceed 22,22220,685 over the Plan period. Housing delivery willbe 'stepped up' over the first 10 years of this plan to deliver 1,495 new homes each year. This will be achieved by:  1. optimising site densities on Key Development Sites, including those in Housing Renewal Areas;	To align with the London Plan housing target.	Main	b) Justified; d) Consistent with national policy	
M/H/01	Policy 8 C	All existing residential <u>units</u> , uses, floorspace and land will be protected, except where:	For clarity	Minor		
PS/H/02	Para 8.2	The London Plan sets all London boroughs an annual housing target based on the GLA's estimate of land capacity through the Strategic Housing Land Availability Assessment (SHLAA). The target allocated to Westminster in the Draft London Plan is 4,010985 homes per year over ten years. This figure is based on capacity of land to deliver new homes and considers existing local plan policy to estimate capacity.	To reflect changes to the draft London Plan through its examination in public.	Main	b) Justified c) Effective d) Consistent with national policy	
PS/H/03	Para 8.3	The National Planning Policy Framework requires local planning authorities to use a standard methodology to calculate the number of homes needed unless exceptional circumstances exist to justify using a different methodology. The	To align with the London Plan housing target.	Main	b) Justified d) Consistent with national policy	

		standard methodology differs from the				
		SHLAA's capacity based approach in that				
		it starts off with a baseline housing need				
		based on population projections, then				
		adjusts that figure based on an				
		'affordability factor'. The resultant figure is				
		then capped at 40% above the existing				
		housing target. Using this methodology				
		results in an annual requirement of 1,495				
		homes per year for Westminster.				
PS/H/04	Para 8.4	This City Plan is more pro-growth and	To align with the	Main	b) Justified	
		ambitious than its predecessors. Our	London Plan		d) Consistent	
		policies are geared towards encouraging	housing target.		with national	
		applicants to come forward with more			policy	
		housing, optimising housing delivery sites				
		and finding new innovative ways to				
		deliver more homes. We therefore				
		consider we can deliver above the London				
		Plan target of 1,010 per year in the first 10				
		years of the Plan period, to				
		meet the housing need figure derived from				
		the standard methodology. Through this				
		approach, we expect to exceed the				
		London Plan derived target of				
		22,2220,685 homes across the Plan				
		period. Setting a higher housing target in				
		the first 10 years of this plan is part of our				
		pro-growth and ambitious narrative and				
		sets a strong foundation for delivering				
		more homes to meet actual need rather				
		than just satisfying assumed capacity				
		based on a previous policy approach.				
PS/H/05	Figure 14	Replace with updated trajectory	Reflects	Main	b) Justified	
			changes to the		c) Effective	
			evidence - detail		d) Consistent	
			is set out in the		with national	
			appendix		policy	

PS/H/06	Para 8.5	We can demonstrate at least five years of housing land supply to satisfy the requirement to identify a five-year supply of deliverable housing sites available to achieve the housing target of 1,495 homes per year over this period. Our Housing Trajectory (Figure 14) demonstrates that Westminster will be able to meet the housing target, taking account of a range of sources of supply. This includes an allowance for small sites (below 25 units) in line with the Draft London Plan small sites target for Westminster, which also takes account of both non-self-contained homes and vacant properties returning to use, which we strongly support—particularly those on Historic England's 'Heritage at Risk' register.			b) Justified d) Consistent with national policy	
PS/H/07	Para 8.7	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. Nevertheless, high existing use values in Westminster mean that it is not always possible to predict when land will come forward for redevelopment. This means that large sites will inevitably continue to come forward as windfalls and therefore we continue to include a large-windfall allowance in our housing trajectory. These 'windfall' developments are not included as allocated land in the Plan, but eConsistent past trends in windfall-	To reflect changes to Appendix 1 (PS/A1/01) and the council's analysis of windfalls.	Main	b) justified c) effective	

		development and future projections are				
		used to estimate the future scale of				
		windfall_delivery_from_such_schemes.				
PS/H/08	Para 8.8	Historically, housing in Westminster has	For consistency	Main	b) justified	
		been developed at relatively low densities.	with changes to		c) effective	
		This cannot continue in the face of very	Appendix 1			
		high demand for housing and projected	(PS/A1/01)			
		population growth. Therefore, as				
		developable land is scarce, to deliver our				
		housing targets, higher density				
		development will be required. Our key				
		development sites in Appendix 1 have				
		been modelled at higher densities than in				
		their existing form, to maximise their				
		potential for new homes.				
M/H/02	New para	Existing Housing	For clarity on	Main	c) Effective	
	8.10		the application		,	
		The high cost of land in Westminster and	of the policy and			
		its limited availability mean that all existing	in response to			
		housing uses must be protected. The	representations			
		acute shortage of affordable housing and	from the Mayor			
		the continued need to provide for family-	of London and			
		sized homes mean that the only	Maida Hill			
		exceptions where the loss of residential	Neighbourhood			
		uses or floorspace may be acceptable is	Forum.			
		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.				
M/H/03	New para	To help meet the continued need for	For clarity and	Main	c) Effective	This modification
	8.11	family sized housing in Westminster, the	in response to		, 2	changes how the
	]	council will allow the loss of one existing	representations			policy operates by
		Country will allow the loop of one oxiding	10procontations	l	J	policy operated by

		non-family sized 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 deconverted to create family-sized homes should not exceed the 200sq m maximum unless it is demonstrably impracticable to do so.	from Mayor of London.			clearly setting out how loss of existing residential will be assessed and improves its effectiveness as a result.
M/H/04	Para 8.10	Re-numbered to Para 8.12	Correction.	Minor		
PS/H/09	Policy 9 A	At least 35% of all new homes will be affordable across Westminster.	For clarity and in response to representations from the Mayor of London.	Main	b) Justified c) Effective	Statement of Common Ground between WCC and Mayor of London (SCG_007)
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.	Main	c) Effective 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%	For clarity that the policy is in general conformity with the London Plan	Main	c) Effective d) Consistent with national policy	This modification brings this aspect of the policy into line with the London Plan

		affordable homes across London, it is	in response to			approach.
		essential to require affordable housing	representations			арргоасп.
		contributions from private housing	from the Mayor			
		developments. All major developments are	of London.			
		therefore expected to provide at least 35%	or London.			
		of new homes as affordable housing.				
		Developments which fall short of provision				
		of 35% this requirement will be subject to post-permission viability assessment and				
		reviews in line with the Mayor's threshold				
N#/11/07	D 0.0	approach to viability.	Familian's and	N 4 = !	-\ <b>\</b> \(\tau_{\text{c}}\)	This are all Condition
M/H/07	Para 9.2	To maintain our stock, where affordable	For clarity and	Main	c) Effective	This modification
		homes are redeveloped at least an	in response to		d) Consistent	brings this aspect
		equivalent amount of affordable housing	representations		with national	of the policy into
		floorspace must be re-provided. We will	from the Mayor		policy	line with the
		seek an uplift in the amount of affordable	of London.			London Plan
		housing provided where existing				approach.
		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>*T</u> here 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				
M/H/08	Para 9.3	All affordable housing requirements from	For clarity that	Main	<ul><li>c) Effective</li></ul>	This modification
		residential development will be calculated	the policy is in		d) Consistent	brings this aspect
		based on the total gross residential floor	general		with national	of the policy into
		space development proposed (Gross	conformity with		policy	line with the
		Internal Area). All developments that	the London Plan			London Plan
		include the re-development of affordable	in response to			approach.
		housing will be assessed in line with the	representations			
		Mayor's threshold approach to viability. On	from the Mayor			
		estate regeneration schemes we will	of London.			
		maximise the amount of affordable				
		housing, seeking to deliver 50% affordable				

PS/H/10	Para 9.3	housing on public land where viable. On these schemes, Tto facilitate large-scale estate renewal and deliver mixed communities, better quality homes and a more appropriate mix of unit sizes, onestate renewal schemes the 35% affordable housing requirement will apply across the regenerated estate, taking account of any affordable homes that have been re-provided. cont	For clarity and	Minor	Statement of Common Ground
		benefits brought about for residents of affordable accommodation by estate regeneration beyond just an increase in numbers. Maximising affordable housing on estate regeneration schemes, and securing affordable housing through certain commercial developments in the CAZ (see policy 10), will both help contribute to the Mayor's strategic 50% affordable housing target.	in response to representations from the Mayor of London.		between WCC and Mayor of London (SCG_007)
PS/H/11	Para 9.9	Registered Provider (RP) owned affordable homes delivered through section 106 agreements may change to market tenure provided the unit is vacant, the affordable homes are re-provided in Westminster and are of an equal or higher quality elsewhere in the city, in terms of size, location, and design quality, and the change is part of a transparent asset management process. All receipts from the sale of affordable homes to market tenure housing should be re-invested in affordable housing re-provision. The mechanisms for achieving this will be set out in a forthcoming planning obligations and affordable housing SPD.	For clarity and in response to representations from the Mayor of London.	Minor	Statement of Common Ground between WCC and Mayor of London (SCG_007)

M/H/09	Policy 10 B	With the exception of the international centres, where affordable housing units are required rather than a payment in lieu, these should be delivered on-site, unless it is demonstrably impracticable or unviable to do so.	For clarity and to align with Economy policies.	Main	c) Effective	
M/H/10	Para 10.2	A mixed use policy was first introduced into Westminster's planning framework through our Unitary Development Plan (2001997) in response to an imbalance in the delivery of commercial and residential floorspace in the CAZ. cont	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, including changes of use, 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 where issues of viability or the practicality of on-site delivery cannot be overcome, to ensure that affordable housing is delivered on-site as much as possible where it is practical and viable to do so, and thereby achieve mixed communities.		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	For clarity and in response to representations from the development industry on the	Minor		

		better meet identified need, or through provision of more amenity space or better access to a range of transport options.  Land use swaps may be an acceptable mechanism for achieving this where they are considered appropriate.	challenges of on-site delivery.			
M/H/13	Policy 11 B	New build homes will be designed with growing families in mind and 25% of all new homes across Westminster will be family sized.	For clarity that the family-sized housing requirement is.	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.		b) Justified c) Effective	
M/H/16	Policy 11 H	At least 35% A proportion of the purpose-built student accommodation will be secured as affordable student housing accommodation as defined in accordance with 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	c) Effective 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 gGypsy 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 and will not have adverse unacceptable impacts, particularly on traffic or parking.	For clarity and to improve wording.	Main	c) Effective	This modification improves the effectiveness of the policy and clarifies that such developments have impacts beyond traffic and 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. The provision of specialist housing and accommodation will contribute to the council's overall housing target of at least 22,222 20,685 homes over the plan period.	To clarify that provision of specialist housing will contribute to the council's overall housing targets.	Main	c) Effective d) Consistent with national policy	Altered to clarify overall target is now in line with the London Plan
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 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.	To demonstrate general conformity with new London Plan Policy H17.	Main	c) Effective 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. We will expect	For clarity and in response to representations from Unite Students.	Main	b) justified c) effective	

		Duild to rept and large cools purpose built				
		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. cont				
M/H/21	Para 13.1	Housing plays an important role in the	In response to	Minor		
		safety, health and well-being of individuals				
		and communities and in the shaping of	from the Church			
		inclusive neighbourhoods. It must	Street Ward			
		therefore be designed to a high quality.	Neighbourhood			
		This is particularly important in	Forum and			
		Westminster given the growing need for	Achim Von			
		housing driving higher density	Malotki.			
		developments. We will expect all new				
		developments to be tenure blind and				
		maximise tenure integration.				
M/H/22	Para 13.4	The policy requirements Part A of the	For clarity.	Main	c) Effective	
		policy apply applies to: all new homes				
		(across all tenures); residential				
		extensions; when flats are being merged;				
		or when a change of use results in new				
		homes.				
M/H/23	Para 13.6	The Nationally Described Space	For clarity and	Main	b) Justified	
		Standards (NDSS) are therefore adopted	in response to		c) Effective	
		in Westminster and will ensure residents	representations			
		have access to a suitable amount of space	from the Church			
		in their new self-contained homes. This	Commissioners			
		requirement applies to new-build dwellings	for England.			
		however it is recognised that it is often	· ·			
		sometimes impracticable to meet them				
		within heritage assets. However, we				
		expect the standards to be met when				
		converting or extending homes where				
		possible.				

	Economy and Employment									
M/EE/01	Policy 14D	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 (renumber D3 to D4)	For completeness and in response to representations from British Land, BMO Real Estate Partners, and WPA representations.	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.				
M/EE/02	Para 14.11	Given past levels of loss, and the national importance, international and London significance of the central London's office market, the further net loss of total 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.				
PS/EE/01	Paragraph 14.16	As the principle of redeveloping such sites has been established through their inclusion identification as key development identified sites in Appendix 1, proposals for them will not be required to provide evidence of vacancy and marketing.	For consistency with changes to Appendix 1 (PS/A1/01)	Main	c) Effective					
M/EE/03	Policy 15 D	In addition to clause C above, proposals for the permanent change of use of an around floor 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	For clarity and in response to representations from Crown Estate, NWEC, and Bentall	Main	a) Positively prepared	This modification ensures plan is not overly onerous on change of use proposals beyond ground floor and is				

		appropriate marketing of at least 18 months. This includes proposals involving the sub-division and loss of ground floor A1 floorspace, but not the inclusion of subsidiary uses within an A1 store as part of a diversified offer. cont	Greenoak.			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 375,468 284,693 sq m and 467,811 399,021 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.	base.	Main	b) Justified	Ensures plan accurately reflects its supporting evidence
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, but possibly also from the ground floor where retail remains the dominant function.	For clarity and in response to representations from Crown Estate and the Mayor of London.	Main	a)Positively prepared	Ensures policy is not overly restrictive given the challenges facing the retail sector
M/EE/06	Para 15.12	The permanent change of use of an A1 retail unit, including or proposals to subdivide an existing unit to provide an alternative use, it 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	Amend map - see Submission Policies Map and the Schedule of Changes to the Policies Map.	Correction in response to representations from Covent Garden Community	Main	b)Justified c)Effective	

PS/EE/02	Policy 16 B	B. All existing arts and cultural uses  and uses of cultural significance will be protected and proposals for enhancement will be supported in principle. New Proposals for new arts	Association, Longmartin Properties, Berners Allsop Estate, and Baker St Quarter Partnership. For clarity and in response to representations from the Marylebone	Main	c) Effective	Statement of Common Ground between WCC and Marylebone Cricket Club (SCG_008)
		and cultural uses will be supported in:  1. Strategic Cultural Areas when they complement the existing cultural offer; and 2. the town centre hierarchy; and 3. commercial areas of the CAZ. Outside of the CAZ, new arts and cultural uses will be of a scale and nature appropriate to the local context and of benefit to the local community.	Cricket Club.			
PS/EE/03	Paragraph 16.1	Growth in this sector must be balanced with the need to protect the liveability of the city and enhance participation of local communities in cultural activities.  Furthermore, to ensure the continued success of Westminster's visitor economy (including night-time economy) is not compromised by new development, the Agent of Change principle will be applied to proposals looking to introduce sensitive uses such as residential into commercial areas.	For clarity and in response to representations from the Mayor of London.	Minor		Statement of Common Ground between WCC and Mayor of London (SCG_007)

M/EE/08	Para 16.3	There are many parts of the city that have		Minor	
		a distinct cultural focus or present a more	completeness		
		localised cultural offer. These include	and in response		
		Soho for film and visual effects, Church	to		
		Street for art and antiques, and Covent	representations		
		Garden for street entertainment. The city	from the Mayor		
		also has a high concentration of theatres,	of London.		
		music venues and LGBTQI+ venues.			
		cont			
		New footnote: GLA Cultural Infrastructure			
		<u>Map - </u>			
		https://maps.london.gov.uk/cim/index.html.	_		
M/EE/09	Para 16.4	In the Knightsbridge SCA a	For	Minor	
		concentration of institutions of	completeness		
		international importance includes the	and in response		
		Royal Albert Hall, the Serpentine Gallery,	to		
		Imperial College, the Royal College of Art	representations		
		and the Royal College of Music.	from Imperial		
			College.		
M/EE/10	Para 17.5	Although the public health risks of alcohol	For	Minor	
		consumption are recognised, Ppublic	completeness		
		houses can play an important role as	and in response		
		social hubs at the heart of communities,	to		
		add to the diversity of commercial areas,	representations		
		and make a positive contribution towards	from the NHS		
		townscape and local identity. cont	HUDU / CCGs.		
M/EE/11	Para 17.6	These include venues aimed at specific	Туро.	Minor	
		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, 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		Statement of Common Ground between WCC and Sport England (SCG_001)
M/EE/13	Para 18.2	Community facilities and infrastructure can be either publicly or privately owned and/or operated. Wherever possible, they should have shared or extended use to serve the wider community, for example, the use of school sports facilities beyond the school day for the wider community 12a.  To respond to this opportunity the council has developed a new Community Use Agreement (CUA) template, based on Sport England's guidance. This is what we use to secure community use of community facilities of all types, in schools and elsewhere. CUAs will be secured via planning condition.  New Footnote:  12aSee Sport England guidance on making the best use of school facilities www.sportengland.org/useourschool/		Main	c) Effective	Statement of Common Ground between WCC and Sport England (SCG_001)
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 Where a community facility is identified as surplus	For clarity and in response to representation from Sport England.	Minor		Statement of Common Ground between WCC and Sport England (SCG_001)

		to requirements via a strategy published by the council* (or alternative needs assessment accepted by the council as more up to date and robust), 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. cont  *New footnote: Such as the council's Playing Pitch and Built Facilities strategies				
M/EE/15	Policy 19 D 1	financial contributions towards employment, education and skills initiatives from residential and commercial schemes; 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-industries;	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-varied nature. 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.	For completeness.	Minor		

M/EE/18	Para 21.7	Larger floorplate units are generally at odds with Soho's existing scale and grain.  We consider small-scale hotels, in a Soho context, to be those of fewer than 100 rooms.	For clarity.	Main	c) Effective	This modification gives clarification to what is considered a small-scale hotel.
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 for a use other than antique trading 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.
		Conn	ections			
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.
PS/C/01	Paragraph 25.3	This responds to the need to create an integrated transport network that minimises the impact that motorised traffic has on growth by directly designing in more pedestrian and cycle measures. It is also consistent with the Mayor's Transport Strategy, which aims for 80% of all personal trips across London to be by walking, cycling or public transport journeys by 2041 (with higher mode shares expected in well-connected locations such as Westminster).	Resolve objection from Mayor of London	Minor		Statement of Common Ground between WCC and Mayor of London (SCG_007)
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	For completeness and in response to	Minor		

		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 (including river buses), underground and national rail networks.	representations from Port of London Authority.		
M/C/03	Policy 26 B 2	Contribute towards improved legibility and wayfinding including signage to key infrastructure, transport nodes, green spaces, the Thames Path 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, given the pressure from competing uses, priority to deliver public realm improvements, 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 may not always be appropriate-it is also important that the location and design of short-stay cycle parking does not negatively affect pedestrians, particularly in areas of high footfall, public transport reliability or essential deliveries and servicing.  Wherever possible it should therefore be provided at a convenient location within a development site rather than on the public highway. This approach is reflected in Westminster's travel pattern that suggests people don't generally cycle to visit areas like the Central Activity Zone (CAZ) and many of Westminster's town centres"	For clarity and in response to representations from Mayor of London and Transport for London.	Minor	Statement of Common Ground between WCC and Mayor of London SCG_007_V2

M/C/05	Para 27.2	Improvements to routes to and from public transport nodes (bus stops and stations) are critical in ensuring that facilities can maintain or improve passenger experience and in 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 all sustainable transport modes bus network and associated infrastructure;	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 cont	Correction.	Minor		
PS/C/02	Paragraph 27.5	Victoria Coach Station (VCS) is the country's largest and is considerably exceeding its original built capacity, resulting in substantial congestion and environmental and amenity concerns. We will continue to work with TfL and National Express to find an appropriate strategy to relieve these impacts in the short-term. In the long, term we support the closure of VCS and relocation of new coach terminal provision. As such VCS has been allocated as a key development site	For consistency with changes to Appendix 1 (PS/A1/01)	Main		
PS/C/03	Policy 28 A	A. The parking standards in the Draft London Plan Appendix 2 will apply to all developments. except in parking zones Band F where the following maximum residential standards will apply: 1.Up to 0.4 spaces per residential unit and clause Band D to H of Draft London Plan policy	Resolve objection from Mayor of London. For consistency with changes to Appendix 2	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground

PS/C/04	Policy 28 B	T.6.1 detailed in Appendix 2.  2. All new parking these spaces should provide active provision for electric charging vehicles. while the remaining spaces should incorporate a passive provision.  BIn zones B & F Wwhere on-site parking	(deleted). To reflect changes to the council's position on electric vehicles. Resolve	Main	c) Effective	between WCC, GLA and TFL. (SCG_003_V2)  This modification
		is delivered applicants will:  1. provide car club membership for all residents and provision of car club spaces;  2. ensure that all outdoor and open parking areas are designed to a standard which accommodates the need for safe pedestrian and vehicle movement and creates permeable links through the site;  3. prioritise the issue of parking spaces within development to families with young children; and let, rather than sell, parking spaces to new residents of new developments on a short-term basis, with spaces allocated to individual addresses or property number S.	objection from Mayor of London		d) Consistent with national policy	brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)
PS/C/05	Policy 28 C	C. The council will apply the maximum non-residential car parking standards set out in Appendix 2 the Draft London Plan.	For clarity. For consistency with changes to Appendix 2 (deleted).	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)

PS/C/06	Para 28.4	On-site Parking 28.4 / The National Planning Policy Framework (NPPF) advises that local authorities should consider an area's accessibility, type, mix and use of development, availability of public transport, local car ownership levels and the need to reduce the use of high- emission vehicles when setting local parking standards.	To align supporting text with changes to Policy 28	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)
PS/C/07	Para 28.5	28.54 / Our approach to residential car parking conforms to the <a href="Draft">Draft</a> London Plan principle of balancing new development with the prevention of excessive car parking that undermines cycling, walking, and public transport use. In accordance with the NPPF, Appendix 2 sets out maximum parking standards, which take into account existing levels of car ownership, existing on-street parking stress levels,6 and the high level of public transport provision in Westminster. The standards also set out the requirements for electric vehicles to encourage use of new technologies, minimum requirements for cycle parking provision and requirements for disabled and car club spaces in both residential and non-residential developments. The standards in table 10.3 'Maximum residential parking standards' in the Draft London Plan apply in Westminster and set out maximum residential parking standards, which take into account the high level of public transport provision in the city. For non-residential developments the standards in the Draft	To align supporting text with changes to Policy 28	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)

		London Plan also apply in Westminster.				
PS/C/08	Para 28.6	28.65 Given the high levels of public	To align	Main	c) Effective	This modification
		transport provision and accessibility to	supporting text		d) Consistent	brings the policy
		jobs, leisure and shopping facilities in	with changes to		with national	into line with the
		Westminster, we have taken the view	Policy 28. For		policy	London Plan
		that new development should be	consistency with			approach.
		predominantly car free. Notwithstanding,	changes to			Statement of
		there will always be a need to ensure	Appendix 2			Common Ground
		that a lack of provision does not result in	(deleted).			between WCC, GLA
		significant increases in demand for on-				and TFL.
		street parking in the vicinity of the				(SCG_003_V2)
		development, leading to increased				
		congestion, disruption to traffic flow, air				
		and noise pollution, poor parking practices, and adverse impacts on the				
		amenity of residents. To ensure this is				
		the case, developments should not				
		create or exacerbate areas of parking				
		stress. As a result, we will not allow the				
		parking stress level in a local area to				
		exceed the defined threshold of 80% of				
		on-street parking spaces being occupied				
		during the day or at night, in compliance				
		with existing parking restrictions. Where				
		a residential development without on- or				
		off-site car parking is proposed in an				
		area of existing high parking stress (i.e.				
		over 80% of on-street parking spaces				
		being occupied during the day or at				
		night, in compliance with existing				
		parking restrictions), mitigation				
		measures will be expected to off-set the				
		impact of increased car ownership on				
		Westminster's streets. As a minimum,				

		101 01 1 1 100 01 1 1	T			
		mitigation may include lifetime car club membership for all future residential				
		occupiers, increased cycle parking				
		quantum and quality within the				
		development site, provision of off-street				
		car parking in the vicinity of the site by				
		utilising existing non-residential car				
		parking spaces and other measures				
70/0/00	D 00.7	agreed with the council.	<b>-</b>		\ <b>-</b> (' ':	T1 : 1:0: 4:
PS/C/09	Para 28.7	28.7 / As a result, we have developed a	To align	Main	c) Effective	This modification
		parking policy approach which functions on two distinct but interrelated levels.	supporting text		d) Consistent with national	brings the policy into line with the
		Firstly, we have an overarching parking	with changes to Policy 28		policy	London Plan
		policy which covers most of the city and	Fulley 26		policy	approach.
		follows emerging London Plan car free				Statement of
		standards and secondly, we have a				Common Ground
		localised policy specifically covering				between WCC, GLA
		Parking Zones B & F.				and TFL.
						(SCG_003_V2)
PS/C/10	Para 28.8	28.8 / The second strand of this policy	To align	Main	c) Effective	This modification
		allows on-site parking under the	supporting text		d) Consistent	brings the policy
		conditions outlined above. It is	with changes to		with national	into line with the
		considered that this approach more	Policy 28		policy	London Plan
		accurately reflects the particular				approach.
		characteristics and future development				Statement of
		plans inherent in these zones. The				Common Ground
		justification for a localised parking approach in these distinct zones is:				between WCC, GLA and TFL.
		The levels of parking stress are most				(SCG_003_V2)
		acute in and around the Paddington				(300_003_v2)
		Opportunity Area where a significant				
		portion of Westminster's growth is-				
		targeted (Zones B). — Kerbside space				
		within Westminster is at a premium and				
		exacerbated by parking stress levels.				
		Less polluting travel modes such as				
		electric charging points along with public				

	T		T	1	T	T
PS/C/11	Para 28.9	realm improvements are challenging to deliver when space is limited. — Air quality is one of the top concerns for Westminster's residents. If off street parking is only allowed for a fraction of the predicted growth in zones B and F, residents would need to travel and search for parking spaces due to kerbside stress experienced in these zones. — 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 formany families moving to and staying in Westminster. — Zones B and F are separated from Westminster's main parks and areas of open space.  28.9 / Transport assessments or statements for proposed developments without parking provision should explore the issue of parking stress and include an analysis of existing levels in the	To align supporting text with changes to Policy 28	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach.
PS/C/11	Para 28.9	statements for proposed developments without parking provision should explore the issue of parking stress and include	supporting text with changes to	Main	d) Consistent with national	brings the policy into line with the London Plan

PS/C/12	Para 28.10	28.10 / It is expected that major-schemes will be appropriate for-dedicated parking provision in zones B-& F. In these zones car parking spaces-should be let on a short-term basis so-that the usage of these spaces and areas can be kept under review. Where-car free development is stipulated in the policy, appropriate mitigation measures will be required, such as the fully policy-compliant delivery of sustainable-transport infrastructure to encourage a modal shift, including cycle parking, cycle hire facilities and electric vehicle charging provision dependent on the location of the development. We advocate the letting rather than selling of car park spaces to residents in new development on a short term basis so that their use can be kept under review. If under-used, this approach enables car parks to be converted into another use.	To align supporting text with changes to Policy 28	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)
PS/C/13	New Para 28.6	28. 6 Where on-site parking is provided in line with clause A-C, developers will also include sustainable transport measures, such as provision for car clubs and cycling parking. Disabled parking for residential and non-residential uses should be provided in accordance with the Draft London Plan standards. We advocate the letting rather than selling of car park spaces to residents in new development on a short term basis so that their use can be kept under review. If under-used, this approach enables car parks to be converted into another use.	To align supporting text with changes to Policy 28	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)

PS/C/14	Para 28.11	Car clubs and car sharing 28.447 The use of car clubs can contribute to a reduced need for car ownership and hence reduce parking stress, and as such they are encouraged. Where provision is made for car clubs, they should provide a range of vehicle types and sizes, including low emission and family sized vehicles. This can help broaden the appeal of membership to a range of households. Doing so can improve take- up thus reduce demand for car ownership and parking stress.	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).		a) Effortivo	This modification
PS/C/15	New Para 28.8	28.8 Where parking is provided in new residential developments, free membership to a Carplus accredited car club will be secured for the occupiers of all residential units. The demand for car club bays arising from this requirement should be assessed as part of the Transport Assessment or Statement. If necessary, off-street parking will be provided by the applicant in a publicly accessible location.	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)
PS/C/16	New Para 28.9	Cycle and Motorcycle parking 28.9 Cycle parking should be provided in accordance with the Draft London Plan where they do not conflict with public realm enhancements. Motorcycle / moped parking should also be provided in accordance with the Draft London Plan standards.	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)

PS/C/17	New para 28.10	Cycle facilities  28.10 Showers, changing facilities and lockers should be provided for cyclists at all new workplaces (including A class uses), places of further and higher education, hospitals and health facilities. At least one shower will be installed for every 20 cycle parking spaces provided and one locker will be provided per cycle space. These facilities will be conveniently located in relation to the cycle parking spaces and accessible to all staff (and students where applicable).  Note: subsequent renumbering of paragraphs following these modifications.	To align supporting text with changes to Policy 28. For consistency with changes to Appendix 2 (deleted).		c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)
PS/C/18	Para 28.14	28.143 The London Plan seeks to Although the policy encourages car-free residential development, but the London Plan standards are not strictly car-free if residents can acquire will still be able to apply for on-street parking permits. Issuing permits for developments that have no on-site parking facilities would mean that the number of cars parked on-street is likely to increase and have an adverse impact on other highway users and uses, reallocation of highway space to sustainable transport modes as well as the ability of residents to find an on-street parking space, leading to increased travel on the highway network. The eligibility criteria for onstreet residents' parking permits will be kept under review.  Therefore, in residents' parking Zone B-	To align supporting text with changes to Policy 28	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)

PS/C/19	Para 28.17	and F, where on-street pressure is high and where high levels of residential development are expected to take place the issuing of permits to residents of new developments will be kept underreview.  Note: subsequent renumbering of paragraphs following these modifications.  28.176 Housing Estate Renewal schemes will be expected to attain an overall	For clarity.	Minor		
M/C/08	Para 28.8	reduction in car parking provision over time.  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 families	In response to representations from Transport for London, Mayor of London and various resident groups.	Main	c) Effective d) Consistent with national policy	This modification brings the policy into line with the London Plan approach. Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)
M/C/09	Policy 29 A	moving to and staying in Westminster.  Given the increasing demands on existing highway space, the council will resist the loss of highway land particularly footways. In cases involving the setting back of buildings, the council will seek to ensure the designation of resulting frontage land is designated as highway.	For clarity and in response to representations from Transport for London and Church Commissioners for England.	Main	c) Effective	Strengthens the policy approach.

M/C/10	Policy 29 B	New highway accesses should minimise the amount of footway, cycling space and	For clarity and in response to	Main	c)Effective	Strengthens the policy approach.
		kerb space lost for parking and / or servicing and should ensure no loss of street furniture	representations.			ропсу арргоаст.
M/C/11	Para 30.9	Move this paragraph to sit as supporting text for policy 26 (new para 26.13)	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 and groundwater will be considered through appraisals such as noise, and air quality and land contamination 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, the Thames Vision, 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 32G	Proposals for permanent moorings on the River Thames will:  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:	For completeness and in response to representations from the Environment Agency.	Main	a) Positively prepared d) Consistent with national policy	This modification adds to the policy, giving full consideration to all factors relating to flood risk and management of the Thames foreshore.  Draft Statement of Common Ground between WCC,

		<ul> <li>4. Not compromise the integrity of the River Thames flood defences or the ability to raise it in the future in line with the Thames Estuary 2100 Plan; and</li> <li>5. Not negatively impact the intertidal foreshore defined and protected within the London Biodiversity Action Plan and, where feasible, provide improvements to intertidal habitats. and, wWhere required, developers should demonstrate necessary, provide appropriate mitigation measures that will preserve the continued dynamism and biodiversity value of the foreshore.</li> </ul>			Environment Agency and Thames Water (SCG_011)
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. Development in the south east marine plan area in the tidal Thames may need a licence from the Marine Management Organisation (MMO).	completeness and in response to	Minor	
M/C/16	Para 32.9	Enhanced pier provision in the right locations can help broaden the choice of transport modes (including for small scale freight and the movement of construction waste) 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, to manage flood risk, 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		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
		Envir	ronment			
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 remains achieving a carbon neutral city is now 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 health and wellbeing of existing and future occupiers, 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.	Main	c)Effective	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
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 minimum 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.  Applicants should follow the council's Contaminated Land Guidance for Developers and adhere to relevant quidance published by regulatory bodies (including the Environment Agency) and other stakeholders (including. Claire, CIRIA and British Standards).	In response to representations from the Environment Agency.	Minor		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
M/E/05	Policy 35 G	Developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. cont	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.  Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
PS/E/01	Paragraph 35.11	Development should aim to create net gains in biodiversity, leaving the natural environment in a better state than before. There are a growing number of tools and good practice guides available which can help [NEW FOOTNOTE: Including Natural England's Biodiversity Metric 2.0].	For clarity and in response to representations from the Environment Agency.	Minor		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)

PS/E/02	Figure 28	Updating Figure 28 to show the triangular open space in front of the QEII centre as a private open space rather than public open space.	To correct an error identified by BDP	Main	a) Positively prepared	Amended from CORE_025 to correct error identified by BDP
M/E/06	Para 36.4a (new para)	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. Sleeping accommodation below the modelled breach flood level will not be supported in areas at risk of flooding from a breach in the Thames Tidal Flood Defences, unless it can be adequately demonstrated that there is a permanent fixed barrier to prevent water ingress, as set out in Environment Agency guidance.	In response to representations from the Environment Agency.	Main	d) Consistent with national policy	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
M/E/07	Policy 36 G	G. All existing flood management infrastructure will be protected, including access for maintenance. Wherever possible, an undeveloped buffer zone of 16m should be maintained around flood defences structures, including buried elements of the flood defence should be maintained.	For clarity and in response to representations from the Environment Agency.	Main	c) Effective	Strengthens the policy approach.  Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
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. Development should not limit future raisings of flood defences outlined in the Thames Estuary 2100 Plan.	For clarity and in response to representations from the Environment Agency.	Main	c) Effective	Strengthens the policy approach.  Draft Statement of Common Ground between WCC, Environment Agency and Thames Water

						(SCG_011)
PS/E/03	Paragraph 36.5	Besides the Thames Barrier, Westminster is protected from tidal and fluvial flooding by Thames Tidal Flood Defences including the Embankment wall. We will protect flood management infrastructure to ensure the risk of flooding is minimised. Development within 16m of a tidal flood defence would only be acceptable if it can be demonstrated that the defences can be raised and maintained for the lifetime of the development. Access to defences for maintenance and emergency purposes must be retained, and their improvement will be sought as a condition or via legal agreement where appropriate.	For completeness and in response to representations from the Environment Agency.	Main	d) Consistent with national policy	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
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. We may use conditions to ensure necessary water or sewerage network upgrades.	In response to representations from Thames Water.	Minor		

M/E/10	Policy 38 D	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.	For completeness and in response to representations from NLWP.	Main	c) Effective	Strengthens the policy approach.
M/E/11	Policy 38 E	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.	In response to representation from the Mayor of London and NLWP.	Main	c) Effective	Strengthens the policy approach.
M/E/12	Para 38.2	Our strategic focus is on waste reduction and recycling in the city. In accordance with 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. We are committed to ensuring that waste is managed appropriately and efficiently in the city Recent evidence <sup>7</sup> 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. 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.	For completeness and in response to representations from NLWP.	Minor		

M/E/13	Para 38.3	Developments should provide adequate waste management facilities that are fully integrated into the design of the scheme. 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 the amalgamation of facilities in an area may be required in locations that demand an area specific approach to waste management. cont		Main	d) Consistent with national policy	Strengthens the policy approach.
M/E/14	New para 38.4	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.	For completeness.	Main	d) Consistent with national policy	Strengthens the policy approach.
M/E/15	Para 38.2	Re-number para 38.5:  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 tomeet our strategic waste planning duties.	For completeness to reflect our evidence base and in response to representations from the Mayor		a) Positively prepared c) Effective	Statement of Common Ground between WCC, Mayor and neighbouring boroughs (SCG_004)

		The council will shortly be carrying out a	of London and			
		Waste Data Study to provide an	NLWP.			
		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 with other London boroughs using				
		this facility, the council will collaborate to				
		address the resultant capacity shortfall.				
M/E/16	New para	Agricultural waste is composted in the	To reflect	Minor	d) Concietont	
141/ 11/10					d) Consistent	
10,2,10	38.6	City's Royal Parks together with	evidence base.		with national	
W/L/10		City's Royal Parks together with agricultural waste imports from other			,	
W/L/10		City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is			with national	
107.0		City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of			with national	
10,210		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			with national	
W/L/10		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			with national	
W. L. TO		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			with national	
III/L/10		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			with national	
III/L/10		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			with national	
		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			with national	
NI, LI TO		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			with national	
		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			with national	
		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			with national	
NI, LI TO		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			with national	
147,2710		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			with national	
		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.			with national	

M/DH/01	Policy 39 B	All development will positively contribute and respond to Westminster's townscape and streetscape including having regard to:  i. the character and appearance of the existing area, adjacent buildings and heritage assets, the spaces around and between them and the pattern and grain of existing streets, squares, mews and passageways (part I split into two points)	For clarity and in response to representation from Historic England.	Main	c)Effective d)Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002)
M/DH/02	Policy 39 B 3	" the form, character, ecological and heritage value of parks, gardens and open spaces".	For clarity and in response to representation from Historic England.	Main	d) Consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002)
M/DH/03	Policy 39 D 3	SUSTAINABLE DESIGN 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 and water efficiency.	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.  Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
PS/DH/01	Policy 39 D (new point 6)	6. maximising opportunities for greening including incorporation of living roofs, walls, landscaping and nature based sustainable drainage where appropriate.	In response to representations from Environment Agency and Thames Water.	Main	d) Consistent with national policy	Draft Statement of Common Ground between WCC, Environment Agency and Thames Water

					(SCG_011)
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:  i. Non-domestic-residential developments of 500 sq m (GIA) of floorspace or above will achieve at least BREEAM "Excellent" or equivalent standard.  ii. Residential cConversions and extensions of 500 sq m (GIA) of residential floorspace or above, or five or more dwellings will aim to achieve "Excellent" in BREEAM domestic refurbishment.		Minor	
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. To achieve our growth targets sustainably, we expect a designled approach which will optimise capacity of sites in the most appropriate way, based on an understanding of context.	For clarity and in response to representations.	Minor	
M/DH/06	Para 39.3	We will prepare supplementary guidance on the application of this and the other design and heritage 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	For completeness and in response to	Minor	

M/DH/08	Para 39.10	minimising risks of overheating and other measures, for example incorporation of green infrastructure, and flood resilience and sustainable drainage measures. cont  All development should ensure the reduction, reuse or recycling of resources	representation from the Environment Agency.	Minor		
		and materials, including water and waste and minimise energy use and emissions that contribute to climate change.	and in response to representations.			
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. 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.	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.  Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
M/DH/10	Para 39.11	Finally eConsideration should also be given to how buildings and spaces will be managed by either private or public owners and managers, to ensure they remain of high quality over the lifetime of the development.	Correction.	Minor		
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	Correction (equivalent standards are not set out above).	Minor		

		how they will meet BREEAM or equivalent standards set out above.				
M/DH/12	Policy 40 D	Development will protect the skyline, prominence and iconic silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance identified significant views out of, across and towards the World Heritage Site.	For clarity and in response to representations.	Main	c) effective	Statement of Common Ground between WCC and Historic England (SCG_002)
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. The council will commit to lead the production and review of an updated World Heritage Site Management plan.	In response to representation from Historic England.	Main	a)positively prepared c) effective	Statement of Common Ground between WCC and Historic England (SCG_002)
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, informed by using Heritage Impact Assessment methodology and that any harm, including cumulative harm, has been avoided or justified.	For clarity and in response to representations.	Main	c) effective d) consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002)
M/DH/15	Policy 40 K	Development will preserve or enhance the character and appearance of conservation areas, retaining features that contribute positively to their significance and protecting their settings Features that contribute positively to the significance of conservation areas will be retained and Oepportunities will be taken to enhance them conservation areas and their settings, wherever possible.	Grammatical correction and for clarity.	Main	c) effective	

M/DH/16	Policy 40 Q	Proposals affecting Westminster's historic parks, gardens and open spaces will safeguard their special historic interest, 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.	Main	d) consistent with national policy	Statement of Common Ground between WCC and Historic England (SCG_002)
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 and as an integral part of good growth.	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. Development beyond the designated boundary but within the setting of the site can also affect its OUV. Its setting is not precisely defined.	For clarity and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002)
M/DH/19	Para 40.5	Where development will affect the site or its setting, applicants should will be required to demonstrate proposals will conserve, enhance or better reveal its OUV. Sufficient information should will be provided to demonstrate impacts have been considered. and Ddepending on the scale and nature of proposals, in addition to the heritage statement, this should include a Heritage Impact Assessment using the methodology set out by ICOMOS. cont	For clarity and in response to representation from Historic England.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002)

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 and its setting is realised. Enhancements to the spaces within and immediately adjacent to the site, including improvements to public realm, approaches and ceremonial routes 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		Statement of Common Ground between WCC and Historic England (SCG_002)
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 working 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		Statement of Common Ground between WCC and Historic England (SCG_002)
M/DH/22	Para 40.11	The total or substantial demolition of listed buildings which will result in substantial harm will only be considered where exceptional circumstances have been demonstrated, as set out in the tests in the National Planning Policy Framework (NPPF).	For clarity of the Plan's consistency with the NPPF			
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	For clarity and in response to representation from Historic England.	Main	b) justified c) effective	Statement of Common Ground between WCC and Historic England (SCG_002)

		acceptable where the overall integrity of unlisted buildings is maintained in street views 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.				
M/DH/24	Para 40.26	Changes to Development or proposals affecting the layout, design, character, use and function of historic parks and gardens should retain and enhance their significance and should not prejudice their future restoration.	For clarity and in response to representation from Historic England.	Main	c) effective	Statement of Common Ground between WCC and Historic England (SCG_002)
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 and spaces that contribute positively to Westminster's distinctive townscape	For clarity and in response to representations.	Minor		
M/DH/26	Policy 41E & F	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:  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	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.

		further development of a similar form would not cause additional harm or would help to unify a group of buildings and townscape; or  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  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.  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 in Part E.		
M/DH/27	Policy 41 F & G	F G Within the Opportunity Areas, in the International Centres of the West End and in response	7 1 7 1	To clarify approach and its application to both residential and commercial buildings and ensure we are positively planning for growth across the city.

		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.  (F&G merged)				
M/DH/28	Para 41.7	Care should always be taken not to disfigure buildings or upset their proportions and to ensure good standards of amenity as set out in Policy 7.	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.  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.	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 locations, particularly in commercial locations with more varied townscape character.	For clarity and in response to representations.	Minor		
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	Correction.	Minor		

		be sympathetic to age and character of the building and townscape.				
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. World Heritage Site views will be identified in the Management Plan. cont	For completeness and in response to representations.	Minor		Statement of Common Ground between WCC and Historic England (SCG_002)
M/DH/33	Policy 42 A	Tall buildings are defined as buildings of twice the prevailing context height or higher. 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 E and F (and for Housing Renewal Areas, Policy 43).	For clarity and in response to representations.	Main	b) Justified	Strengthens of policy approach to align further with evidence base.
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	For clarity and in response to representations.	Main	b) Justified	Strengthens of policy approach to align further with evidence base.

		character and may be subject to the general principles in clauses D, E and F of this policy (and for Housing Renewal Areas, Policy 43).				
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 and taking into account any exceptional public benefits in full	For clarity and in response to representations.	Main	a) Positively prepared	Clarifying the policy approach, supporting sustainable development.
		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.				
M/DH/37	Policy 43 A	Delivering large scale public estate regeneration comes with unique viability challenges that are different to private developments, such as decanting of existing residents and a higher affordable housing requirement. cont	For clarity and in response to representations.	Minor		
M/DH/38	Para 44.6	The installation of high quality and durable 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 and other measures recommended in the FRA.	In response to representations by Thames Water.	Minor		Draft Statement of Common Ground between WCC, Environment Agency and Thames Water (SCG_011)
		Implementatio	n and monitoring			

PS/IM/01	Page 173	The SPDs will cover the follow topic areas, among others:  - Planning Obligations and Affordable Housing - Heritage - Design and Public Realm - North Bank - Environment - Local Enforcement - West End	Following update to LDS	Minor	
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	
PS/IM/02	Monitoring Framework KPI 1	Delivery of new homes (floorspace, units by size and tenure) against target of 1,495985 new homes per year for the first ten years of the Plan period and 22,22220,685 homes overall up to 2040	To align with the London Plan target as per changes to Policies 1 and 8 (Modification references M/S/02, PS/H/01, PS/H/02)	Minor	
M/IM/02	Monitoring Framework KPI 5 (Trigger for review)	Trend in Nnet reduction in floorspace	In response to representations.	Minor	

M/IM/03	Monitoring Framework KPI 2 (Trigger for	Total number of new affordable homes does not meets target after five three years.	For consistency with KPI 1.	Minor	
M/IM/04	review)  Monitoring Framework KPI 25	Production of updated Management Plan as 'living document' with regular review mechanism and Rremoval of the World Heritage Site from the annual reporting requirements of the World Heritage Committee	In response to representations.	Minor	Statement of Common Ground between WCC and Historic England (SCG_002)
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	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)	Correction and for completeness.	Minor	
M/IM/07	New KPI 39	Number of family sized homes delivered	For completeness.	Minor	
		Appendix 1: Key	Development Si	tes	
M/A1/01	'Key designations' column title, page 180	New footnote: Only key heritage designations have been identified, a comprehensive list of relevant heritage assets will be identified in the Site Allocations DPD.	For- completeness- For consistency with changes to Appendix 1 (PS/A1/01)	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 which are intended to guide the appropriate scale of development proposals but do not represent a minimum	For- completeness For consistency with changes to Appendix 1 (PS/A1/01)	Minor	

		or maximum figure for the site. More detail			
		on the Key Development Sites will be set			
		out in the forthcoming Site Allocations			
PE/A //00	0'' 1	DPD.		N.A.	
M/A1/03	Site 1 -	Comprehensive development of the site	,	Minor	
	Notes	is supported ideally through the creation	consistency		
		of a new masterplan which recognises the			
		site's role as a key driver for growth and a	1 1		
		significant agent for place shaping, whilst-	(PS/A1/01)		
		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 buildings should be considered			
		a number of unlisted hospital buildings			
		make a positive contribution to the			
		conservation area.			
M/A1/04	Site 3 -	Development proposals for the site should	Correction and	Minor	
	Notes	consider the recommendations in respond			
		to the 2004 adopted Planning Brief. Pre-	representation		
		application discussions took place in	from Travis		
		2016. Development should would be of a	Perkins. For		
		lower scale than avoid creating a tunnel	consistency		
		effect along the surrounding buildings with			
		lower height values fronting the canal	Appendix 1		
		potentially increasing in height towards	(PS/A1/01)		
		the Harrow Road.	(1. 3// 1.// 3.1)		
M/A1/05	Site 20 -	Transport infrastructure; mixed	In response to	Minor	
	Expected	commercial and residential	representation		
	uses	<u></u>	from TfL		
	0.000		Commercial		
			Development.		
			For consistency		
			with changes to		
			Appendix 1		
			(PS/A1/01)		
			(F3/A1/01)		

M/A1/06	Site 25 - Notes	Historical pre-application discussions have taken place. The buildings make an important contribution to the character and appearance of the conservation area. Retention of the existing buildings would be supported.	For clarity For consistency with changes to Appendix 1 (PS/A1/01)	Minor		
M/A1/07	Site 26- Expected uses	Residential, on-site affordable, public space, a continued military function	In response to- representation- from Defence- Infrastructure- Organisation For consistency with changes to Appendix 1 (PS/A1/01)	Minor		
PS/A1/01	Appendix 1	APPENDIX 1 to be replaced entirely – see below	Changes to Appendix 1 reflect a re- analysis of housing supply and identification of deliverable and developable sites in accordance with national policy	Main	b) Justified d) Consistent with national policy	See Housing Topic Paper Addendum on Housing Supply (EV_H_03)
		Арре	endix 2			
PS/A2/01	Parking standards	APPENDIX 2 to be removed entirely  Note: subsequent renumbering of Appendix 3	As a result of modifications to Policy 28 and its supporting text		c) Effective	Statement of Common Ground between WCC, GLA and TFL. (SCG_003_V2)
		Appendix 3: Schedu	le of Strategic P	olicies		

M/A3/01	Policy 38 D (new clause)	Strategic	Following amendments to policy.	Minor	
M/A3/02	Policy 38E (new clause)	Strategic	Following amendments to policy.	Minor	
		Glo	ossary		
M/G/01	New Definition:	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.	For clarity and in response to representation from Historic England.	Minor	Statement of Common Ground between WCC and Historic England (SCG_002)
M/G/02	Idling	Unnecessarily running a motor vehicles vehicle's engine when the vehicle is not in motion.	Туро.	Minor	
M/G/03	Affordable housing	Housing for sale or rent, for those whose needs are not met by the market in line with the NPPF definition. In Westminster this is split into 'social' and 'intermediate' types.	For clarity.	Minor	
M/G/04	New Definition	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.	For clarity.	Minor	
M/G/05	New Definition	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	For completeness.	Minor	

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

New Figure 14 as referred to in PS/H/05



### New Appendix 1 as referred to in PS/A1/01

### **Appendix 1: Westminster's Housing Trajectory**

The following list of sites are the identified deliverable and developable sites making up Westminster's 5-15 year housing land supply. Sites providing 50 or more net dwellings are named below and are grouped by broad location. Where sites are listed as developable and have no planning status, the indicative housing units have been derived from a broad-brush assessment and are not to be considered as evidence for determining individual planning applications.

Site Name	Planning / Development Status	Delivery phase	Net Housing	Deliverable /
			units	Developable
Paddington Opportunity Area				
Dudley House	Completed 2019-20	1-5	151	Deliverable
North Wharf Road	Under construction	1-5	100	Deliverable
Harbet Road (Merchant Square	Planning application (pending decision)	6-10	426	Developable
building 3)				
Travis Perkins	No planning status	6-10	75	Developable
St Mary's Hospital	No planning status	11-15	400	Developable
Victoria Opportunity Area				
New Scotland Yard	Under construction	1-5	268	Deliverable
Palace Street / Buckingham Gate	Under construction	1-5	72	Deliverable
Victoria Coach Station (Arrivals)	No planning status	6-10	75	Developable
Terminus Place	No planning status	11-15	100	Developable
Victoria Coach Station (Departures)	No planning status	11-15	230	Developable
<b>Tottenham Court Road Opportunity</b>	Area			
Tottenham Court Road Elizabeth Line	Under construction	1-5	87	Deliverable
Station (Oxford Street / Dean Street)				
Church Street/ Edgware Road Hous	ing Renewal Area			
Luton St / Capland Road	Under construction	1-5	157	Deliverable
466-490 Edgware Road	Under construction	1-5	76	Deliverable
Parson's North	Under construction	1-5	60	Deliverable
West End Gate	Under construction	1-5	628	Deliverable
Paddington Green	Under construction	1-5	194	Deliverable
Lisson Arches	Under construction	1-5	59	Deliverable
Church Street Site A	No planning status (council Housing	1-5 (phase 1) / 6-	233 (100 phase	Deliverable (phase 1)/
	Investment Plan)	10 (phase 2)	1, 133 phase 2)	Developable (phase 2)

Council Offices, Lisson Grove	Pre-application (council Housing Investment Plan)	6-10	150	Developable
Church Street Site B	No planning status (council Housing Investment Plan)	6-10 / 11-15	288	Developable
Gateforth and Cockpit Theatre	No planning status (council Housing Investment Plan)	11-15	98	Developable
Church Street Site C	No planning status (council Housing Investment Plan)	11-15	72	Developable
<b>Ebury Bridge Housing Renewal Are</b>	a			
Ebury Bridge Estate	Pre-application (council Housing Investment Plan)	1-5 (Phase 1) / 6-10 (Phase 2)	400 (87 phase 1, 313 phase 2)	Deliverable (Phase 1) / Developable (Phase 2)
North Westminster				
St John's Wood Road / Lodge Road	Planning application (pending decision)	1-5	101	Deliverable
Tollgate Gardens	Under construction	1-5	106	Deliverable
Hathaway House, Woodfield Road	Under construction	1-5	74	Deliverable
221-235 Lanark Road	Under construction	1-5	73	Deliverable
Queens Grove / Finchley Road	Under construction	1-5	66	Deliverable
Bayswater Road / Fosbury Mews	Under construction	1-5	50	Deliverable
Jubilee Sports Centre, Caird Street	Under construction	1-5	56	Deliverable
Dora House, 60 St John's Wood Road	Under construction	1-5	79	Deliverable
Whiteleys Centre	Under construction	1-5	153	Deliverable
St John's Wood Barracks, Ordnance Hill	Under construction (stalled)	1-5	163	Deliverable
Warwick Community Hall, 300 Harrow Road	Planning application (pending decision) (council Housing Investment Plan)	6-10	112	Developable
Carlton Dene, 45 Kilburn Park Road	Pre-application (council Housing Investment Plan)	6-10	88	Developable
Queensway / Moscow Road / Salem Road / Queens Mews	Planning application (pending decision)	6-10	60	Developable
Paddington Exchange	No planning status	11-15	200	Developable
Queensway / Inverness Terrace	Planning application (pending decision)	6-10	90	Developable
Paddington Green Police Station	No planning status	6-10	350	Developable
Westmead, Tavistock Road	No planning status	6-10	68	Developable
Harrow Road / Elmfield Way	No planning status	11-15	100	Developable

Edgware Road Station / Capital House / Griffith House	No planning status	11-15	280	Developable
Royal Oak	No planning status	11-15	200	Developable
Westbourne Park Bus Garage	No planning status	11-15	50	Developable
Central Westminster				
22 Hanover Square	Under construction	1-5	81	Deliverable
Park Crescent / Portland Place	Under construction	1-5	73	Deliverable
Marble Arch / Edgware Road	Under construction	1-5	54	Deliverable
87-89 Cleveland Street	Under construction (stalled)	1-5	105	Deliverable
Baker Street / George Street	Planning permission (live, unimplemented)	1-5	51	Deliverable
Moxon Street Car Park / Aybrook	Under construction (stalled)	6-10	79	Developable
Street				
Shaftesbury Avenue	No planning status	11-15	70	Developable
South Westminster				
New Court	Completed 2019-20	1-5	221	Deliverable
First Chicago House	Under construction	1-5	119	Deliverable
Stockley House, Wilton Road	Under construction	1-5	108	Deliverable
Ergon House	Under construction	1-5	108	Deliverable
Millbank	Under construction	1-5	207	Deliverable
Old War Office	Under construction	1-5	85	Deliverable
Arundel Great Court	Under construction	1-5	151	Deliverable
Alexandra Buildings, Castle Lane	Planning permission (live, unimplemented)	1-5	86	Deliverable
Chelsea Barracks	Under construction	1-5	361	Deliverable
Hyde Park Barracks	No planning status	11-15	250	Developable
Queen Alexandra Military Hospital	No planning status	11-15	170	Developable
Other deliverable sites providing	Under construction/ Planning permission	1-5	2,144	Deliverable
fewer than 50 net homes	granted			
Other developable sites	Including sites under pre-application discussions and other identified council sites	6-10 / 11-15	784	Developable
Windfalls	N/A	6-10 / 11-15	5,000	Developable
Total Deliverable Housing Supply (Years 1-5)	-	1-5	6,914	-
Total Developable Housing Supply	-	6-10	5,136	-
(Years 6-10)				

Total Developable Housing Supply	-	11-15	5,175	-
(Years 11-15)				
OVERALL TOTAL	-	-	17,225	-