



Document title: Schedule of Main Modifications for consultation (November 2020)

Document code: CORE_028

Schedule of Main Modifications for consultation (November 2020)

Introduction

This schedule contains all main modifications to Westminster's City Plan 2019 – 2040 (submission version, document reference CORE_001) for public consultation which the Inspectors examining Westminster's City Plan 2019 - 2040 consider are necessary for soundness. It supersedes CORE_025_V4. A sustainability appraisal has been undertaken on the impacts of the modifications which is also published for consultation (document reference CORE_029).

The schedule only contains main modifications which are subject to consultation. Where a clause within the policy or any of its supporting text has not been set out below, it is not proposed for modification and is therefore not subject to consultation.

Other minor modifications which do not materially affect the substance of the Plan, its overall soundness or the submitted sustainability appraisal will also be made to the Plan prior to its adoption. The minor modifications will relate to points of clarification, factual updates and typographical or grammatical errors.

The following format has been used to denote the modifications:

- **Underlined bold red text** = new text proposed compared to submission version
- ~~Strikethrough red text~~ = text proposed for removal compared to submission version

INTRODUCTION

Ref.	Section of plan	Proposed modification
MM01	Introduction, "How to use this plan" Step 2, Page 4	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.
MM02	"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.
MM03	Contents, page 7	Appendix 1- Key Development Sites <u>Westminster's Housing Trajectory</u>

SPATIAL STRATEGY

Ref.	Section of plan	Proposed modification
MM04	Policy 1	<p><i>Amend clause A to read:</i></p> <p>A. Westminster will continue to grow, thrive and inspire at the heart of London as a World City by:</p> <ol style="list-style-type: none"> 1. Supporting intensification and optimising densities in high quality new developments that <u>integrate with their surroundings and</u> showcase the best of modern architecture and integrate with their surroundings, to make the most efficient use of land, <u>including through developments that showcases the best of modern architecture.</u> 2. Delivering <u>at least 22,222-20,685</u> homes, <u>of which at least</u> with 35% <u>will be</u> of new homes as affordable. 3. Halting the loss, and s Supporting the growth, <u>modernisation and adaptation</u> of a variety of business space to provide at least 63,000 new office-based jobs <u>alongside other forms of commercial growth.</u> 4. Balancing the competing functions of the Central Activity Zone (CAZ) as a retail and leisure destination, visitor attraction, global office centre, and home to residential neighbourhoods.

5. Protecting **and enhancing** uses of international and/or national importance, the buildings that accommodate them, and the specialist clusters of uses within the city's most distinct places.
6. Supporting town centres and high streets, including centres of international importance in the West End and Knightsbridge, to evolve as multifunctional commercial areas to shop, work, and socialise.
7. Protecting and enhancing the city's unrivalled heritage assets **(including their settings)**, and townscape value.
8. **Adapting to and mitigating the effects of climate change, and** ~~S~~securing enhancements to the natural environment and public realm, including supporting the delivery of a new North Bank river front destination.
9. Prioritising sustainable travel.
10. Ensuring sufficient supporting infrastructure is delivered to facilitate growth.

Amend clause B to read:

B. Growth will **primarily** be delivered through the:

1. Intensification of the CAZ, **the** West End, and our town centre hierarchy **with commercial-led and mixed-use development to provide significant growth in office, retail, and leisure floorspace, alongside new homes;**
2. Continued **major mixed-use** redevelopment ~~within~~ **identified** ~~the~~ Opportunity Areas **to at least achieve London Plan growth targets of 13,000 new jobs and 1,000 new homes in Paddington Opportunity Area; 4,000 new jobs and 1,000 new homes in Victoria Opportunity Area; and 3,000 new jobs and 150 new homes in Tottenham Court Road Opportunity Area;**
3. Renewal of Church Street, ~~/~~ Edgware Road and Ebury Bridge Estate Housing Renewal Areas **to collectively provide 2,750 new homes alongside increased local job opportunities; and**
4. ~~Commercial-led r~~Regeneration of the North West Economic Development Area **including the commercial-led intensification of areas of commercial and mixed-use character, to increase local job opportunities alongside residential growth.**
~~; and~~
- ~~5. Realisation of the potential of our identified key development sites (see Appendix 1).~~

Amend paragraph 1.5 to read:

		<p>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 <u>in addition to meeting the demands from the private housing market,</u> delivery <u>also</u> meets identified need in the affordable sector <u>and conforms with the Mayor's strategic target of 50% affordable housing across all of London.</u> as well as demand from the market</p> <p><i>Amend Figure 7 key diagram so that boundaries of Paddington Opportunity Area, Victoria Opportunity Area, West End Retail and Leisure Special Policy Area, and the CAZ, are all consistent with those shown in the Schedule of Changes to the Policies Map (Sep 2020) – document CORE_026_V2 and the Post-submission Draft Policies Map (July 2020) – document CORE_027_V2</i></p>
MM05	Policy 2	<p><i>Amend policy to read:</i></p> <p>The intensification of the West End Retail and Leisure Special Policy Area (WERLSPA) over the Plan period will deliver the following priorities:</p> <p>A. Significant jobs growth through a range of commercial-led development including retail, leisure, offices, and hotel use. <u>Additional commercial floorspace will be provided in a manner that respects its setting, through:</u></p> <p><u>1. Increased scale and massing in Tottenham Court Road Opportunity Area, to at least achieve London Plan targets of 3,000 new jobs and 150 new homes, and;</u></p> <p><u>2. The sensitive refurbishment and extension, or replacement of existing buildings across the WERLSPA.</u></p> <p><i>Delete clause B and re-name subsequent clauses accordingly</i> B. The realisation of growth targets for the area as identified in the London Plan.</p> <p><i>Amend last 2 sentences of paragraph 2.5 to read:</i></p> <p>Over the Plan period, we will continue to facilitate the further intensification of this area in accordance with the principles of good growth – including through the delivery of the key development sites set out in Appendix 1, and the development of Crossrail 2 safeguarded sites either alongside or after necessary infrastructure works. Delivery of our contribution towards the indicative targets set out in the London Plan will be documented through future Authority Monitoring Reports.</p> <p><i>Remove key development sites from Figure 8.</i></p>

MM06	Policy 3	<p><i>Amend policy to read:</i></p> <p>Development in the Paddington Opportunity Area over the Plan period will deliver the following priorities:</p> <p>A. The achievement of <u>the</u> growth targets for the area <u>of at least 1,000 new homes and 13,000 additional jobs</u> identified in the London Plan.</p> <p><u>F. Upgraded healthcare facilities.</u></p> <p>FG. Enhanced job opportunities and <u>community</u> facilities for the residents of <u>Paddington and</u> the neighbouring areas of Church Street and the NWEDA.</p> <p><i>Amend last sentence of paragraph 3.4 to read:</i></p> <p>Over the Plan period, we will continue to facilitate the further intensification of this area including through the delivery of remaining key development sites set out in Appendix 1.</p> <p><i>Amend paragraph 3.8 to read:</i></p> <p><u>Key Development sites</u></p> <p>Paddington station is a key development site within the area with capacity for expanded transport provision and a mix of commercial uses. Two other key development sites remain in the area. While St. Mary's Hospital provides extremely important health care services, the site has potential for redevelopment to act as a catalyst for change in the area while helping to preserve and enhance its heritage value. The site presents an opportunity to re-provide improved health facilities on site, alongside significant residential and commercial uses, strengthen sense of place and encourage dwelling through an enhanced public realm, and improve links and permeability to the south of the Opportunity Area. Improvements to the appearance and quality of the retail offer on Praed Street are also supported. A number of identified development sites within the area have the potential to contribute significantly to the delivery of the policy priorities. St. Mary's Hospital is one of the largest hospitals in Central London. The site presents an opportunity to re-provide improved health facilities, alongside meeting the other priorities in the Paddington Opportunity Area and wider City Plan objectives.</p> <p><i>Remove Key Development Sites from Figure 9</i></p>
MM07	Policy 4	<p><i>Amend policy to read:</i></p> <p>Development in the Victoria Opportunity Area over the Plan period will deliver the following priorities:</p>

		<p>A. The achievement of <u>the</u> growth targets for the area <u>of at least 1,000 new homes and 4,000 additional jobs</u> identified in the London Plan.</p> <p><i>Amend paragraph 4.3 to read:</i></p> <p>The London Plan sets out indicative growth targets of at least 4,000 additional jobs <u>between 2016 and 2041</u> and 1,000 new homes over the period 2016<u>2019</u>-2041 for the Victoria Opportunity Area and identifies Victoria Station and its environs, including the airspace above its tracks and approaches, to have significant potential for mixed-use intensification. Over the Plan period, we will continue to facilitate the further intensification of the Opportunity Area according to the principles of sustainable development, including through the delivery of key development sites with potential for mixed-use intensification as set out in Appendix 1, and the development of Crossrail 2-safeguarded sites either alongside or after necessary infrastructure works.</p> <p><i>Amend the first part of paragraph 4.10 to read:</i></p> <p>Key dDevelopment sites</p> <p>A number of key development sites exist within the Victoria Station environs, which <u>Victoria Station</u> represents a key opportunity to achieve our targets <u>deliver our priorities</u> for the area, <u>including an improved transport provision, modal integration, public realm and local environmental quality, and act as a catalyst for further development. The presence of other identified development sites within the station's environs, provides scope to</u> while ensuring a coordinated approach to development is taken to integrate sites together and deliver successful places designed around people. This will support the creation of a network of high quality and welcoming places, which will contribute to a stronger identity for the area.</p> <p><i>Amend Figure 10 to remove Key Development Sites from the map and to ensure it is all boundaries are consistent with those shown on the Schedule of Changes to the Policies Map (Sep 2020) – document CORE_026_V2 and the Post-submission Draft Policies Map (July 2020) – document CORE_027_V2</i></p>
MM08	Policy 5	<p><i>Amend paragraph 5.5 to read:</i></p> <p>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 development of key sites at Harrow Road/Elmfield Way and at Westbourne Park Bus Garage among others over the plan period <u>Developments in the NWEDA will deliver a mix of uses including housing,</u> will help to improve pedestrian permeability and provide better connections both within and beyond the NWEDA as well as delivering the land use priorities of the NWEDA. These opportunities will be further explored in the Harrow Road Place Plan.</p>

		<i>Remove Key Development Sites from Figure 11.</i>
MM09	Policy 6	<p><i>Amend paragraph 6.4 to read:</i></p> <p>The Edgware Road Circle & District Line station site, together with the adjacent Capital House and Griffith House, together represent a redevelopment opportunity Opportunities to enable further connectivity between the Church Street / Edgware Road Housing Renewal Area, the Paddington Opportunity Area and the rest of the CAZ should be supported through redevelopment. 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.</p> <p><i>Remove Key Development Sites from Figures 12 and 13.</i></p>

HOUSING

Ref.	Section of plan	Proposed modification
MM10	Policy 8	<p><i>Amend policy title to read:</i></p> <p>8. Stepping up hHousing delivery</p> <p><i>Amend clause A to read:</i></p> <p>A. The number of new homes built in Westminster will exceed 22,222 20,685 over the Plan period. Housing delivery will be 'stepped up' over the first 10 years of this plan to deliver 1,495 new homes each year. This will be achieved by:</p> <ol style="list-style-type: none"> 1. optimising site densities on Key Development Sites, including those in Housing Renewal Areas; 2. delivering a higher number of homes on smaller sites; 3. permitting appropriate upwards extensions; 4. planning positively for tall buildings in certain locations. <p><i>Amend paragraph 8.2 to read:</i></p> <p>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 1,010-985 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.</p>

		<p><i>Delete paragraph 8.3 and re-number subsequent paragraphs accordingly.</i></p> <p><i>Amend paragraph 8.4 to read:</i></p> <p>This City Plan is more pro-growth and ambitious than its predecessors. Our policies are geared towards encouraging applicants to come forward with more 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 22,222 20,685 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.</p> <p><i>Replace Figure 14 with new chart shown at the end of this document.</i></p> <p><i>Delete paragraph 8.5 and re-number subsequent paragraphs accordingly.</i></p> <p><i>Amend paragraph 8.7 to read:</i></p> <p>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 cConsistent past trends in windfall development and future projections are used to estimate the future scale of windfall delivery from such schemes.</p> <p><i>Amend paragraph 8.8 to read:</i></p> <p>Historically, housing in Westminster has been developed at relatively low densities. This cannot continue in the face of very high demand for housing and projected 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.</p>
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		<p><i>Insert two new paragraphs before paragraph 8.10 and re-number subsequent paragraphs accordingly:</i></p> <p><u>Existing Housing</u></p> <p><u>The high cost of land in Westminster and its limited availability mean that all existing housing uses must be protected. The acute shortage of affordable housing and the continued need to provide for family-sized homes mean that the only exceptions where the loss of residential uses or floorspace may be acceptable is where they are being reconfigured to better meet these needs. Where existing supported or affordable housing is being reconfigured or redeveloped it will be assessed against the latest evidence of need, either through the council's Annual Affordable Housing Statement or up-to-date evidence specific to Westminster.</u></p> <p><u>To help meet the continued need for family sized housing in Westminster, the council will allow the loss of one existing 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 de-converted to create family-sized homes should not exceed the 200sq m maximum unless it is demonstrably impracticable to do so.</u></p>
MM11	Policy 9	<p><i>Amend clause A to read:</i></p> <p>A. <u>At least</u> 35% of all new homes will be affordable across Westminster.</p> <p><i>Amend clause H to read:</i></p> <p>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. <u>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.</u></p> <p><i>Amend paragraph 9.1 to read:</i></p> <p>Westminster is the second most expensive local authority in the country in which to rent or purchase a home. Average house prices are more than double those for London and more than 20 times the average Westminster household income. The shortage of land, its high price and current funding mechanisms mean that to exceed the strategic 35% affordable housing target <u>threshold and contribute to the Mayor's strategic target of 50% affordable homes across London,</u> it is essential to require affordable housing contributions from private</p>

	<p>housing developments. <u>All major developments are therefore expected to provide at least 35% of new homes as affordable housing, rising to 50% for developments on public sector land.</u> Developments which fall short of provision of 35%-this requirement will be subject to post-permission viability <u>assessment and reviews in line with the Mayor's Viability Tested Route as part of the threshold approach to planning applications set out in the London Plan. Viability evidence should be submitted in a standardised and accessible format in accordance with London Plan requirements.</u></p> <p><i>Amend paragraph 9.2 to read:</i></p> <p>To maintain our stock, where affordable homes are redeveloped <u>at least an equivalent amount of affordable housing floorspace must be re-provided. We will seek an uplift in the amount of affordable housing provided where existing affordable housing is redeveloped as part of mixed tenure or mixed-use schemes. Such proposals will be expected to submit a viability assessment to maximise the amount of additional affordable housing provided.</u> There There will be no overall net loss of floorspace and re-provision must be in the vicinity of the original home(s) to maintain mixed tenure communities. Provision of affordable housing in the vicinity means it is close to the host development; however, vicinity is not strictly defined to avoid unhelpful restrictions when dealing with different site circumstances or availability and will be assessed in light of the circumstances of each case.</p> <p><i>Amend paragraph 9.3 to read:</i></p> <p>All affordable housing requirements from residential development will be calculated based on the total gross residential floor space <u>development</u> proposed (Gross Internal Area). <u>All developments that include the re-development of affordable housing will be assessed in line with the Mayor's threshold approach to viability. On estate regeneration schemes we will maximise the amount of affordable housing, seeking to deliver 50% affordable housing on public land where viable. On these schemes,</u> To to facilitate large-scale estate renewal and deliver mixed communities, better quality homes and a more appropriate mix of unit sizes, on estate renewal schemes the 35% affordable housing requirement will apply across the regenerated estate, taking account of any affordable homes that have been re-provided. This is in recognition of the wider benefits brought about for residents of affordable accommodation by estate regeneration beyond just an increase in numbers. <u>Maximising affordable housing on estate regeneration schemes will help contribute to the Mayor's strategic 50% affordable housing target.</u></p> <p><i>Amend paragraph 9.13 to read:</i></p> <p>Affordable housing developments completed prior to an application for market housing by public, charitable and non-profit organisations may <u>in some circumstances</u> count towards meeting future affordable housing</p>
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		<p>requirements to enable estate regeneration to take place. The mechanism for this is set out in the Planning Obligations and Affordable Housing Supplementary Planning Document.</p> <p><i>Amend paragraph 9.14 to read:</i></p> <p>Where payments in lieu are accepted, they will be at a level of broadly equivalent value to actual provision so there is no financial benefit from providing a payment rather than delivery of actual units. <u>Payments will be based on a fixed rate per sqm of floorspace that would have been provided as affordable housing. They will be equivalent to the uplift in value resulting from the floorspace that would have been provided as affordable housing being delivered as private housing. This approach will ensure a cost neutral impact on the developer.</u> The value of the payment in lieu, <u>including indexation</u>, is set out in the Planning Obligations and Affordable Housing Supplementary Planning Document.</p>
MM12	Policy 10	<p><i>Delete Policy 10 and supporting paragraphs 10.1 – 10.10 and re-number subsequent policies and supporting paragraphs accordingly.</i></p>
MM13	Policy 11	<p><i>Amend clause B to read:</i></p> <p>B. New build homes will be designed with growing families in mind and 25% of all new homes <u>across Westminster</u> will be family sized. Where two-bedroom units are provided, the majority should be large enough to accommodate two double bedrooms within a single development. Studios will make up no more than 10% of new homes within a single development.</p> <p><i>Amend clause D to read:</i></p> <p>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:</p> <ol style="list-style-type: none"> 1. the accommodation is of poor quality, does not meet contemporary requirements and is not capable of being upgraded; or 2. the use has a demonstrable and significant adverse effect on residential amenity; or 3. it is surplus to requirements as any form of specialist or supported housing and is being replaced by affordable housing; or 4. the accommodation is being adapted or altered to better meet specialist need or to enable residents to remain in their existing property. <p><i>Amend clause G to read:</i></p>

	<p>G. The council supports the development of new, well-managed, purpose-built accommodation for students studying at higher education institutions with a main hub in Westminster. The development of new student accommodation should not result in the loss of other types of housing.</p> <p><i>Amend clause H to read:</i></p> <p>H. At least 35% <u>A proportion</u> of the purpose-built student accommodation will be secured as affordable student housing accommodation as defined in <u>accordance with</u> the London Plan. All accommodation should include a proportion of units that are adaptable to meet specialist needs.</p> <p><i>Amend clause I to read:</i></p> <p>I. Existing purpose-built student accommodation will be protected unless <u>demonstrably surplus to requirements</u>. its loss forms part of a published strategy of a higher education institution.</p> <p><i>Amend clause J to read:</i></p> <p>J. Permission for gGypsy and traveller sites may be granted <u>permitted</u> where it is demonstrated that there is a need in Westminster, and that they are well- <u>appropriately</u> designed developments that and will not have adverse unacceptable impacts, <u>particularly</u> on traffic or parking.</p> <p><i>Amend paragraph 11.1 to read:</i></p> <p>Westminster has a broad range of housing needs and we support delivery of a range of housing types and sizes to meet those needs. <u>The provision of specialist housing and accommodation will contribute to the council's overall housing target of at least 22,222-20,685 homes over the Plan period.</u></p> <p><i>Amend paragraph 11.4 to read:</i></p> <p>Our Housing Needs Analysis shows that a large proportion of new homes in Westminster are developed as one- and two-bedroom units. In order to give families more housing choices, 25% of all new homes <u>across Westminster</u> will be family sized – this means having between three and five bedrooms. Homes with six or more bedrooms are unlikely to meet the housing needs of families and will therefore not be included in the calculation of the 25%. Furthermore, the majority of two-bedroom units within a single development should be large enough to accommodate two double bedrooms.</p> <p><i>Insert new paragraph after 11.5 and re-number subsequent paragraphs accordingly:</i></p>
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		<p><u>The 25% requirement for family-sized homes is a strategic target. Whilst individual proposals should seek to incorporate this requirement, there may be circumstances where it is not appropriate to provide family-sized homes, due to a site's small size, location or other practicability issues. These circumstances will be assessed on an individual basis.</u></p> <p><i>Amend paragraph 11.18 to read:</i></p> <p>We will continue to support the development of purpose-built student accommodation for <u>higher education</u> institutions with their main hub in Westminster, secured via nominations agreements, in order to balance the demand for student accommodation against the competing demands for other types of housing in the city.</p> <p><i>Amend paragraph 11.19 to read:</i></p> <p>Student accommodation must be <u>affordable</u>, well-managed and a sufficient proportion must be adaptable to meet specialist needs. Thirty five per cent of accommodation must be provided as affordable student accommodation in line with the London Plan <u>A proportion of purpose-built student accommodation must be provided as affordable student accommodation, as defined in the London Plan and associated guidance. The Mayor's threshold approach to viability will be used to assess the appropriate proportion of affordable student accommodation in accordance with London Plan Policy H17.</u></p>
MM14	Policy 12	<p><i>Amend clause A to read:</i></p> <p>A. The council welcomes applications for innovative models of high-quality housing <u>that contribute to providing a range of housing options to Westminster's residents.</u> particularly where the new homes are provided at rental levels equal to or less than Westminster's intermediate rents, or enable access to more affordable homes than market housing.</p> <p><i>Insert new Clause B to read as follows (and renumber subsequent clauses accordingly):</i></p> <p>B. <u>Qualifying Build to Rent and large-scale purpose-built shared living proposals will be required to provide a proportion of the accommodation as affordable housing in accordance with the London Plan.</u></p> <p><i>Amend paragraph 12.2 to read:</i></p> <p>We welcome innovative ways to deliver more housing and address the high cost of traditional self-contained market housing. If proposals for innovative housing models do not meet the definition of affordable housing they will be required to contribute to the supply of affordable housing regardless of what use class they fall into. This</p>

		<p>requirement may be waived if the rents charged are at a level comparable to Westminster's intermediate rent and these rental levels are secured by legal agreement in perpetuity. <u>We will expect qualifying Build to Rent and large-scale purpose-built shared living schemes to follow the affordable housing requirements set out in the London Plan (see Policy H11 Build to Rent and Policy H16 Large-scale Purpose-built shared living).</u> A deviation from the social/ intermediate tenure split set out in Policy 9 may be acceptable if any of these models of housing are delivered, following the conditions set out in the London Plan.</p>
MM15	Policy 13	<p><i>Amend clause D to read:</i></p> <p><u>EXTERNAL AMENITY SPACE</u></p> <p>D. All new-build homes will provide at least five sq m of private external amenity space for each dwelling designed for one-two persons or more and, where practicable, a further one sq m for each additional person the dwelling is designed to accommodate. Where <u>it is not considered practicable or appropriate to provide</u> private external amenity space is not practicable or appropriate <u>for all or some homes, the following measures will be required:</u></p> <p>1. dwellings will have additional internal living space equivalent to the external requirement in addition to the minimum space standards; or where this is not practicable; and</p> <p>2. the external requirement will be provided as-</p> <p><u>1. provision of</u> communal external amenity space; or where this is not practicable; and</p> <p>3. the external requirement will be provided as</p> <p><u>2. provision of additional and/or higher quality</u> public open space.</p> <p><i>Insert new clause E:</i></p> <p><u>E. Where it is sufficiently demonstrated that it is not practicable or appropriate to provide any type of external amenity space, additional internal living space equivalent to the external requirement set out in clause D will be required.</u></p> <p><i>Amend paragraph 13.4 to read:</i></p> <p>The policy requirements <u>Part A of the policy</u> apply <u>applies</u> to: all new homes (across all tenures); residential extensions; when flats are being merged; or when a change of use results in new homes.</p> <p><i>Amend paragraph 13.5 to read:</i></p> <p>We need to ensure that all new-build homes are adaptable or adapted for wheelchair users, so new homes are future-proofed for a population that is living longer (and for less able-bodied residents). It will also prevent</p>

	<p>residents being forced to move into specialist housing because their current home cannot meet their changing needs over their lifetime. This requirement applies to new-build dwellings – it is recognised that it is often- <u>sometimes</u> impracticable to meet the Building Regulations requirements within listed buildings <u>heritage assets and converted homes</u>, as – for example – changes to built form and fabric are more restricted. However, we expect the standards to be met in all types of homes where possible.</p> <p><i>Amend paragraph 13.6 to read:</i></p> <p>In a place where demand for housing is extremely high and higher density is subsequently the norm, the minimum size of new homes must be kept in check. The Nationally Described Space Standards (NDSS), are therefore adopted in Westminster <u>in accordance with the London Plan (see Policy D6 Housing quality and standards)</u> and will ensure residents have access to a suitable amount of space in their <u>self-contained</u> homes. <u>This requirement applies to new-build dwellings – it is recognised that it is sometimes impracticable to meet them within heritage assets. However, we expect the standards to be met when converting or extending homes where possible.</u></p> <p><i>Amend paragraph 13.7 to read:</i></p> <p>External amenity space in housing developments contributes to good quality living environments and may provide leisure space and pleasant views. <u>Common forms of private amenity space are balconies and gardens. The use of screens or glass enhancements or stepping back the facade can help mitigate unacceptable potential impacts such as overlooking, privacy, noise or air quality. The requirement does not count towards the GIA used in calculating the internal space standard set out in clause C.</u> The provision of the private external amenity space <u>This</u> requirement mainly applies to new-build dwellings <u>– it is recognised that</u> as it is often- <u>sometimes</u> impracticable to provide new external floorspace within listed buildings <u>heritage assets and converted homes</u>, as – for example – changes to built form and fabric are more restricted. <u>However, we expect the standards to be met in all types of homes where possible.</u></p> <p><i>Amend paragraph 13.8 to read:</i></p> <p>Moreover, in a densely built environment such as Westminster, it may not always be practicable or appropriate to provide <u>the provision of</u> private external amenity space <u>for all or some homes within a development</u> such as balconies and gardens <u>may be impracticable or inappropriate.</u> Enclosed balconies or winter gardens, the use of screens or glass enhancements or stepping back the facade can help mitigate unacceptable potential impacts such as overlooking, privacy, noise or air quality and make the provision of the private external amenity space neighbourly and appropriate. <u>In these cases, developers should provide the external requirement in the form of c</u>Communal external amenity space <u>that</u> will be safe, accessible for all residents across tenures.</p>
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		<p><u>designed to take advantage of direct sunlight and are well-managed. Common forms of communal amenity space are courtyards, terraces and roof gardens. When it is not possible to provide communal amenity space, additional or higher quality public open space in line with amenity, design and environment policies in this Plan should be provided.</u></p> <p><i>Insert new paragraph 13.9:</i></p> <p><u>We want to ensure that all new-build housing developments provide external amenity space; however, the provision of external private amenity space, communal amenity space or additional public open space may not always be practicable or appropriate. Where it has been demonstrated that it is not possible to provide any type of external amenity space, dwellings will provide additional internal living space equivalent to the external requirement set out in clause D. Enclosed balconies or winter gardens should be considered as options. This will be in addition to the minimum internal space standards set out in clause C.</u></p>
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ECONOMY AND EMPLOYMENT

Ref.	Section of plan	Proposed modification
MM16	Policy 14	<p><i>Amend clause A to read:</i></p> <p>A. New and improved office and B1 floorspace will be supported to provide capacity for at least 63,000 new jobs over the Plan period, enabling the continued growth and clustering of the creative, knowledge, and research-based sectors. Additional floorspace that meets the needs of modern working practices, including <u>through</u> the provision of co-working space <u>and a range of Class E (commercial, business and service) uses on site</u>, is supported in principle in the:</p> <ol style="list-style-type: none"> <u>Parts of the</u> Central Activities Zone (CAZ) <u>with a commercial or mixed-use character</u>, including the West End Retail and Leisure Special Policy Area (WERLSPA) and Opportunity Areas; North West Economic Development Area (NWEDA) and Church Street / Edgware Road Housing Renewal Area; and Town centre hierarchy.

		<p><i>Amend clause D to read:</i></p> <p>D. Proposals involving the net loss of office floorspace from the CAZ will only be acceptable in the following exceptional circumstances:</p> <p>1. the proposal is in a predominantly residential area and would re-instate an original residential use; or</p> <p>2. any loss of floorspace is necessary as part of the renewal of outdated stock to secure a high-quality office development with ancillary facilities that meets the needs of modern working practices; or</p> <p>3. there is no interest in the continued use of the site for office purposes, as demonstrated by vacancy and appropriate marketing for a period of at least 18 months, and the replacement use is for educational, community or hotel use.</p> <p><u>D. The net loss of office floorspace from the CAZ:</u></p> <p><u>1. to residential development will only be permitted in those parts of the CAZ that are predominantly residential in character and where the proposal would reinstate an original residential use;</u></p> <p><u>2. to hotel use will only be permitted where there is no interest in its continued use for office or any other Class E (commercial, business and services), education or community use, as demonstrated by vacancy and appropriate marketing for a period of at least 12 months.</u></p> <p><i>Amend paragraph 14.6 to read:</i></p> <p>Office growth in these locations will be secured through a combination of:</p> <ul style="list-style-type: none"> - the refurbishment and expansion of existing stock; - the development of new office buildings at a greater density than the buildings they replace; - the inclusion of additional office floorspace as part of new mixed-use developments; and - the reconfiguration of existing commercial spaces, which could include some small-scale changes of use that <u>are</u> is deemed permitted development. <p><i>Insert new paragraph after 14.6 to read as follows, and renumber subsequent paragraphs accordingly:</i></p> <p><u>While commercial uses including offices are a strategic function of the CAZ as set out in the London Plan, it is important to recognise that some parts of the CAZ, such as much of Pimlico, parts of Knightsbridge, Mayfair, Belgravia, Marylebone and Fitzrovia all include streets that are wholly or predominantly residential</u></p>
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		<p><u>in character. Policy therefore seeks to direct offices to those parts of the CAZ that are of a commercial or mixed-use nature, in order to protect local character and residential amenity. The dense nature of Westminster makes it difficult to accurately and definitively map clear boundaries of different character areas on a city-wide level. As such, judgements will be based on an assessment of the mix of land uses within the vicinity of a development site, and any assessments of local character within made neighbourhood plans.</u></p> <p><i>Amend paragraph 14.8 to read:</i></p> <p>Offices are identified in national planning policy as a town centre use, and recent changes to the use classes order <u>increase flexibility for a wider range of uses typically found in town centres categorised as Class E, to enable them to evolve as multifunctional places to work, shop, and spend leisure time.</u> treats some loss of retail and other town centre uses to office floorspace as permitted development, provided certain criteria are met. Additional office floorspace provision will therefore be supported across our highly accessible network of town centres as they continue to evolve as multi-functional areas of commercial activity.</p> <p><i>Amend paragraph 14.11 to read:</i></p> <p>Loss of office floorspace from the CAZ risks undermining its key strategic employment functions as defined in the London Plan, and as a result, the global competitiveness of the London economy. We have therefore introduced an Article 4 Direction to ensure that proposals for loss of B1 offices to C3 residential continue to require planning permission. Given past levels of loss, and the national importance, <u>international and London significance</u> of <u>the</u> central London's office market, the further <u>net</u> loss of <u>total</u> office floorspace from the CAZ <u>to residential or hotel use</u> will normally be resisted, <u>subject to some exceptions.</u></p> <p><i>Amend paragraph 14.12 to read:</i></p> <p>There are however some exceptional circumstances where the loss of some office space from the CAZ may be deemed acceptable. Some parts of the CAZ are largely residential in character but include isolated office buildings that have historically come from conversion of buildings originally built and occupied as residential. Where such office stock does not meet the needs of modern ways of working, and there is limited scope for it to be adapted to do so, conversion back to its original residential use can provide benefits in terms of townscape, local character, and increasing housing supply.</p> <p><i>Delete paragraph 14.13 and re-number subsequent paragraphs accordingly:</i></p> <p>The upgrading and refurbishment of outdated existing stock within commercial areas may require some net loss of</p>
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		<p>dedicated office floorspace as they adapt to meet the needs of modern working practices. This could include the provision of ancillary facilities for workers such as cycle parking and changing facilities, but also other uses that improve the working environment such as an on-site café or gymnasium. Within the town centre hierarchy, it could also include provision for retail at ground floor.</p> <p><i>Amend paragraph 14.14 to read:</i></p> <p>There may also be instances where existing office stock within the CAZ has reached the end of its economic life, and there is no interest in its continued use for such purposes, <u>or for other uses that fall within Class E of the Use Classes Order</u>. In such circumstances, its redevelopment or re-purposing for educational uses such as new teaching and research facilities can provide economic benefits in terms of improving skills and contributing to the further growth and clustering of knowledge-based industries. Community uses such as new health facilities can help address needs arising from a growing population and provide significant employment opportunities. <u>Where there is also no interest in these uses,</u> Well designed and managed hotels <u>can</u> meanwhile, support London's visitor economy and the strategic functions of the CAZ. <u>Past levels of permissions to convert or redevelop office floorspace from the CAZ to hotel use in Westminster, however, justify only continuing to support such proposals after other reasonable options have been exhausted.</u></p> <p><i>Delete paragraph 14.15:</i></p> <p>Sites included in Appendix 1 have been identified as being of strategic importance to the delivery of the City Plan objectives. They include some sites with dated office stock that does not meet the needs of modern office-occupiers. While the redevelopment of such sites may result in a net loss of office floorspace, they have been identified as part of a plan-led approach in recognition of the scope they offer to deliver the following benefits:</p> <ul style="list-style-type: none"> –an enhanced townscape; –more efficient use of land in areas benefiting from infrastructure investment; –the provision of a range of commercial uses that make a positive contribution to the CAZ, including better quality office floorspace, alongside much needed housing and affordable housing. <p><i>Delete paragraph 14.16 and re-number subsequent paragraphs accordingly:</i></p> <p>As the principal of redeveloping such sites has been established through their identification as key development site, proposals for them will not be required to provide evidence of vacancy and marketing</p>
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MM17	Policy 15	<p><i>Amend clause A to read:</i></p> <p>A. <u>The intensification of town centres, high streets and the CAZ to provide additional floorspace for main town centre uses is supported in principle, subject to impact on townscape and heritage.</u> Proposals in existing town centres and high streets will enhance and diversify their offer as places to shop, work and spend leisure time.</p> <p><i>Amend clause B to read:</i></p> <p>B. <u>Uses that provide active frontages and serve visiting members of the public will be required at the ground floor throughout the town centre hierarchy. Uses serving visiting members of the public will also be supported</u> A1 retail will remain the priority use at ground floor throughout the town centre hierarchy, and at first floor level within centres characterised by large format, multi-level stores. It will be supported by complementary town centre uses (including standalone units and subsidiary uses within larger stores) that increase customer dwell time, and enhance town centre vitality and viability. The use of upper floors for residential use is supported in principle across all parts of the town centre hierarchy except the International Centres.</p> <p><i>Amend clause C to read:</i></p> <p>C. All <u>D</u>development within the town centre hierarchy will: 1. be of a scale, type and format that reflects and enhances the role and function of the centre within which it is proposed.</p> <p><u>1. The International Centres of the West End and Knightsbridge will provide a focal point for large format comparison retail, supported by complementary town centre uses that increase customer dwell time, and new office floorspace;</u></p> <p><u>2. The WERLSPA will provide a wide mix of commercial uses that support the West End's role as a retail, employment and cultural hub, and as a centre for the visitor, evening and night-time economy;</u></p> <p><u>3. CAZ Retail Clusters will provide further large format retail and complementary town centre uses to meet the needs of residents, workers, and visitors;</u></p> <p><u>4. Major, District and Local Centres will provide a mix of commercial and community uses to meet residents' day to day shopping needs, provide local employment opportunities, and support opportunities for community interaction.</u></p> <p>;- and-</p>
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		<p>2. maintain an active frontage; and</p> <p>3. not result in two or more non-A1 uses consecutively in the ground floor frontage of an International Centre, or three or more non-A1 uses consecutively in the ground floor frontage of a CAZ Retail Cluster, Major, District or Local Centre.</p> <p><i>Delete clause D and re-name subsequent clauses accordingly</i></p> <p>D. In addition to clause C above, proposals for the permanent change of use of an A1 retail unit will be supported by evidence that there is no reasonable prospect of its continued use for A1 retail purposes, as evidenced by appropriate marketing of at least 18 months. This includes proposals involving the sub-division and loss of A1 floorspace, but not the inclusion of subsidiary uses within an A1 store as part of a diversified offer. It also does not apply to proposals within the WERLSPA, unless the site is also designated as part of the West End International Centre or a CAZ Retail Cluster.</p> <p><i>Amend clause H to read:</i></p> <p>H.G. Town centre uses will also be supported in principle throughout the <u>parts of the CAZ with a commercial or mixed-use character, having regard to the existing mix of land uses and neighbourhood plan policies. In the parts of the CAZ that are commercial or mixed-use in character, the loss of town centre uses from the ground floor will be resisted.</u>, where they do not cause significant harm to local character or residential amenity.</p> <p><i>Amend clause I to read:</i></p> <p>I.H. Only sites that fall outside of the CAZ and the town centre hierarchy will be required to pass the sequential test set out in the National Planning Policy Framework (NPPF). Retail impact assessments will only be required for proposals of more than 2,500 sq m of <u>(gross) new retail floorspace outside the town centre hierarchy, including proposals for Class E (commercial, business and service uses) that would enable at least 2,500 sq m of (gross) floorspace to be occupied by retail use.</u></p> <p><i>Amend clause J to read:</i></p> <p>J.I. Within largely residential areas not well served by the town centre hierarchy, <u>conversion of existing shops to residential use will be resisted. Alternative uses that maintain an active frontage, provide opportunities for employment, or serve local community needs, will be supported where any negative impacts on residential amenity are fully mitigated.</u> A1 convenience stores will be protected.</p> <p><i>Amend paragraph 15.2 to read:</i></p>
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	<p>Most of these centres are designated through the London Plan. Additional areas designated through this plan include the Local Centres and some CAZ Retail Clusters. All are based on the findings of our Town Centre Health Checks 2018, which monitors the performance of our centres in terms of mix of uses, levels of vacancies, and their boundaries. <u>The intensification of these centres, through a combination of the repurposing and extension of, and replacement of, existing buildings, will be necessary to secure their long-term sustainability. High quality new developments that respond to their surroundings and are supported by investment in a healthier physical environment will be vital in ensuring key commercial centres in Westminster remain attractive to a full range of users as places to shop, work, and spend leisure time.</u></p> <p><i>Amend paragraph 15.3 to read:</i></p> <p><u>Growth and diversification</u> Retail growth</p> <p>GLA forecasts based on a range of scenarios indicate that despite the growing use of online shopping and increased space efficiency within stores, over the period from 2015 to 2041, there will be a need for between 375,468 <u>284,693</u> sq m and 467,811 <u>399,021</u> sq m (net) additional comparison retail floorspace in Westminster*, assuming base expenditure levels continue. Over the Plan period, this equates to 229,944 – 322,286 sqm. Only small-scale growth in convenience shopping is expected as retail growth will mainly be driven by increased spending from domestic and overseas visitors and workers on comparison goods. The extent and distribution of existing convenience shopping in Westminster means demand for additional provision to meet the growing resident populations' day-to-day needs are likely to be minimal.</p> <p><i>*Footnote: Consumer Expenditure and Comparison Goods Floorspace</i></p> <p><i>Amend paragraph 15.4 to read:</i></p> <p>The increased trend in retail towards larger, more successful centres that serve a range of visitors highlights the need to continue to plan for retail growth in Westminster through the intensification of existing centres and high streets - where some additional building height can also accommodate office floorspace growth <u>and other town centre uses</u>. This is also key to why Westminster is anticipated to absorb a significant proportion London's future retail growth. Furthermore, the Town Centre Health Check 2018 indicated that town centres and high streets across Westminster largely buck the trend of nationwide struggles - with healthy, diverse centres that have relatively low levels of vacancy.</p> <p><i>Insert new paragraph after paragraph 15.4 and re-number subsequent paragraphs accordingly:</i></p> <p><u>To ensure their long-term sustainability, it is important that town centres and high streets can adapt to</u></p>
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		<p><u>changing consumer demands and behaviours, and the challenges posed by online retail. Recent revisions to the Use Classes Order recognise this, by combining a number of different town centre uses including shops, cafés and restaurants, offices, gyms and health centres as Class E (commercial, business and service) uses - thereby enabling a shift towards mixed-use and multi-purpose spaces; both within commercial parades, and individual units. The focus across our town centres will therefore be on providing a mix of commercial uses that provide activity at street level, and creates a welcoming, attractive and healthy environment for consumers to shop, access services, and spend leisure time, whilst also supporting their role as major employment hubs and visitor destinations. Beyond Class E (commercial, business and service) uses, other town centre uses such as pubs and drinking establishments, exhibition spaces, cultural and leisure uses, can all help support the future success of these key clusters of commercial activity. Ground floor residential however, would break up active frontages, is not identified as a main town centre use in the NPPF, and will therefore be resisted.</u></p> <p><i>Amend paragraph 15.5 to read:</i></p> <p>Complementary town centre uses-</p> <p><u>Development across the town centre hierarchy</u> Where new A1 retail and complementary town centre uses are proposed, they should be of a scale, type, and nature that reflects the role of the centre within which it is located (see explanation of each type of centre below). This will ensure the town centre hierarchy is not compromised. Proposals should <u>also</u> demonstrate how they will enhance the existing centre and mitigate any potential negative impacts, <u>having regard to policies 17 (visitor economy) and 18 (food, drink and entertainment uses) where relevant. Although they provide active frontages and serve visiting members of the public, a predominance of uses such as shisha bars, betting shops and fast-food takeaways (which are all classified as sui generis uses) can undermine town centre vitality and viability and be detrimental to public health, and should be avoided.</u> Determining whether a non-A1 use is complementary will be based on the NPPF definition of main town centre uses, and consideration of the role, function and health of the centre within which it is proposed. Typically, it will include uses such as cafés, restaurants, hotels, cultural and leisure uses, and spaces that can host exhibitions and events. These could be within standalone units or as subsidiary uses in a larger host unit. Complementary uses may be subject to requirements to mitigate <u>For such uses, mitigating any</u> potential negative effects <u>will also require the production and</u> including through the implementation of management plans. In addition, recent changes to the Use Classes Order means that some loss of retail space and other town centre uses to office floorspace may be treated as permitted development.</p> <p><i>Delete paragraph 15.7 to read and re-number subsequent paragraphs accordingly:</i></p> <p>Diversification and innovation</p>
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		<p>While A1 retail will remain the priority use throughout the town centre hierarchy, to ensure existing centres thrive, they must also be given scope to diversify and evolve to new trends. A range of complementary town centre uses of an appropriate scale will therefore be vital to support their roles as social spaces, increase customer dwell time, and make them more interesting places to visit. In some instances, this could necessitate the loss of some A1 floorspace – such as from upper floors of multi-level stores. It could also see a continued blurring of use classes – for example shops that also serve food and drink on site and provide exhibition space. While such diversification can help businesses survive and thrive, some such proposals may be classified as sui generis, and will need to be considered in terms of the impact of any entertainment uses. Where diversification means a unit is legally re-classified as sui generis, but retail remains the dominant use, the change in use class will not necessarily mean the proposal is unacceptable instead it will be treated on its merits.</p> <p><i>Amend paragraph 15.8 to read:</i></p> <p><u>Meanwhile use and innovation</u></p> <p>Alongside these changes in the sector, further innovation such as the greater use of digital media within stores, and the development of new models such as brand showrooms and experience centres, is also welcomed. Well managed pop-up and meanwhile uses <u>across the town centre hierarchy</u> can <u>also help</u> minimise vacancies while a long-term occupier is sought, maintain active frontages, support small businesses to test their products, add to the vibrancy of an area by attracting new footfall, and provide community benefits. All of this, combined with an improved public realm, <u>and further innovation such as the greater use of digital media within stores, and development of new models such as brand showrooms and experience centres,</u> will help ensure our town centres and high streets remain at the cutting edge of the revolution in retail, and offer experiences that cannot be matched by online shopping.</p> <p><i>Delete paragraphs 15.12 – 15.13 and re-number subsequent paragraphs accordingly:</i></p> <p><u>Protecting vitality and viability</u></p> <p>15.12 Flexibility to support change and innovation within our town centres and high streets does have to be carefully managed to ensure a critical mass of retail that attracts shoppers, and accommodate projected levels of retail growth. The cumulative loss of A1 retail units and floorspace through the change of use and sub-division of existing units can harm the appearance, character and retail function of town centres and high streets. A predominance of uses such as shisha bars, betting shops and fast-food takeaways can undermine town centre vitality and viability and be detrimental to public health. Ground floor residential meanwhile, would break up active frontages and is not identified as a main town centre use in the NPPF. The permanent change of use of an A1</p>
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		<p>retail unit, or proposals to sub-divide it and lose a subsequent standalone A1 unit will be considered in terms of its impact on the health of the centre, and will require marketing evidence demonstrating that continued retail use is no longer viable. Loss of A1 floorspace to accommodate subsidiary uses within an A1 unit meanwhile, will not require marketing evidence in the interests of enabling existing businesses to diversify, innovate, survive and thrive. Where temporary consents are granted for non-A1 uses (including under permitted development rights), this will not remove requirements for marketing evidence before any permanent change of use from A1 retail is considered.</p> <p>Permitted development</p> <p>15.13 In considering change of use proposals, many town centre uses enjoy permitted development rights under national planning legislation. We will therefore keep the balance of uses and emerging clusters across our centres under review through updates to town centre health checks, and use our powers to make Article 4 Directions requiring the submission of planning applications as appropriate.</p> <p><i>Amend paragraph 15.14 to read:</i></p> <p>Within the town centre hierarchy, the West End and Knightsbridge International Centres provide London's prime retail destinations and offer unparalleled specialist and comparison retail of regional and national importance that draws in international visitors. The West End International Centre includes Oxford Street, Regent Street and Bond Street, while Knightsbridge International Centre includes Brompton Road and extends beyond the city boundary into the Royal Borough of Kensington and Chelsea. A1-cComparison retail is the dominant use in these centres, which are largely characterised by large format stores, often provided over multiple floors.</p> <p><i>Amend paragraph 15.15 to read:</i></p> <p>The Mayor of London has identified these centres as being of high commercial growth potential* and therefore especially suitable for further large-scale retail growth. To reflect their role and function, retail provision should be predominantly for comparison shopping and maintain a strong retail core at ground floor level and immediately above. Complementary town centre uses that enhance customer experience <u>and increase dwell time will be focussed on upper floors, alongside other commercial uses including office floorspace are also supported, particularly on upper floors. In addition, new and improved office floorspace on upper floors can support wider jobs growth, and support customer spend within the International Centre from a worker, as well as visitor population.</u> While residential use of upper floors can help sustain smaller town centres and high streets that do not generate high footfall, they are not supported within the International Centres to ensure:</p> <ul style="list-style-type: none"> - they do not fetter opportunities for these commercial centres of international importance to continue to grow and
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		<p>diversify;</p> <p>- the scale of commercial activity in these centres, and their operational requirements, are not compromised.</p> <p><i>*Footnote: 2017 London Town Centre Health Check, Greater London Authority 2018</i></p> <p><i>Amend paragraph 15.16 to read:</i></p> <p>Where provided, non-retail uses should -A1 uses will normally be subsidiary to primary A1 uses, and will enhance and sustain, rather than dilute the centre's comparison shopping role. Convenience shopping such as supermarkets could also dilute the comparison shopping offer and present significant servicing issues and are therefore discouraged.</p> <p><i>Amend paragraph 15.19 to read:</i></p> <p>Alongside retail growth, a balanced mix of complementary leisure, entertainment, food and drink and cultural and employment offers are welcomed to help the West End to grow, not only as a global shopping destination, but also as an enhanced leisure and employment destination. Policy therefore provides for greater flexibility of uses within the WERLSPA than elsewhere in the town-centre hierarchy recognising the interdependency of the mix of uses in this wider area.</p> <p><i>Amend paragraph 15.20 to read:</i></p> <p>Continued growth in a diverse range of commercial uses in the West End will make an important contribution to meeting Westminster's employment growth targets. To ensure such growth occurs in a manner that maintains and enhances the West End's global reputation, and improvements to the local environment are secured, we will continue to work within the West End Partnership (WEP) and with other stakeholders.</p> <p><i>Amend paragraph 15.22 to read:</i></p> <p>Queensway / Westbourne Grove Major Centre is the only Major Centre in Westminster. It is designated as such due to the scale and nature of its mix of convenience and comparison retail activity and complementary town centre uses. It has a traditional high street character largely surrounded by residential areas and provides an important convenience shopping function to these local residents. However, an over-concentration of entertainment uses and the loss of retail have weakened the vitality and viability of the centre, which now needs reversing. Over the plan period, new development should ensure the centre meets the needs of its local catchment area through a variety of commercial space at ground floor, including shops and services, workplaces, and</p>
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		<p><u>community facilities, supported by residential development above</u> that reinforces the centre's retail function through opportunities for ground floor retail with residential or complementary town centre uses above is welcomed, supported by new community facilities and investment in the public realm.</p> <p><i>Amend paragraph 15.27 to read:</i></p> <p>Whilst not forming a part of Westminster's town centre hierarchy, the wider CAZ as defined in the London Plan covers much of the city. Town centre uses provide a key element of the mix of uses within it and contribute to its character and strategic functions. However, the CAZ is also home to many local residents and some parts of it are also wholly residential in character. To respect its many functions, <u>and the need to protect residential amenity,</u> policy support is <u>therefore</u> provided for town centre uses <u>within the parts of the CAZ that are of a commercial or mixed-use character. Furthermore, this character and function will be maintained by resisting the loss of ground floor town centre uses from these areas to residential development that would break up commercial frontages, and may result in a poor living environment. In applying this policy approach, the dense nature of Westminster makes it difficult to accurately and definitively map clear boundaries of different character areas on a city-wide level. As such, judgements will be based on an assessment of the mix of land uses within the vicinity of a development site, and any assessments of local character within neighbourhood plans.</u> where they would not be detrimental to local character or residential amenity. Our approach to requirements for sequential tests and impact assessments – as set out in the NPPF – reflects that whilst commercial uses should be supported <u>throughout the parts of</u> within the CAZ <u>with a commercial or mixed-use character,</u> the town centre hierarchy should provide the key focus of retail related growth. <u>However, recent revisions to the Use Classes Order mean that it may not always be clear if a development proposal will provide retail floorspace, as permission can be sought for a variety of uses under Class E (commercial, business and service) uses. Where a proposal for more than 2,500 sq m of Class E floorspace is proposed outside of the town centre hierarchy with no restrictions on types of future occupier, a retail impact test will be required. This will help ensure that any significant out of centre retail provision would not be harmful to the retail function of the town centre hierarchy.</u></p> <p><i>Amend paragraph 15.28 to read:</i></p> <p>Existing <u>shops</u> convenience stores outside of the town centre hierarchy</p> <p>The extent of Westminster's town centre hierarchy means that most residents benefit from good access to a diverse range of shops and services. However, outside of the CAZ there are some residential areas that are not within easy walking distance (i.e. 400m or less) of a designated town centre or high street. In such areas, where isolated A4 convenience stores that do not form part of a wider parade exist (e.g. a corner shop), they provide a vital function for meeting the day to day needs of surrounding communities, and can help avoid unnecessary trips</p>
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		<p>by car. <u>Under recent changes to the Use Classes Order, such stores can be converted to any Class E (commercial, business, and service) use without planning permission. Beyond this, some other uses falling outside of Class E, such as community halls or a pub or drinking establishment, may also provide enhanced amenities for the local community, and changes to these uses will therefore also be supported subject to appropriate mitigation of any negative amenity impacts (e.g. noise disturbance from a pub or drinking establishment).</u></p> <p><i>Amend paragraph 15.30 to read:</i></p> <p>It also found that these parades are in close proximity to better performing designated centres that provide a greater critical mass of activity. As such, and given the struggles smaller centres face, only existing A1 convenience stores within these parades are considered to merit policy protection. Flexibility is offered for other units to be converted to residential or community uses – where such proposals would not compromise any neighbourhood plan designations, and secure a high quality design that enhances local character. <u>As recent changes to the Use Classes Order have increased flexibility in terms of the use of premises within such parades, policy also supports a range of new uses that can provide community benefits (subject to impact on amenity), to help improve the vitality and viability of these parades. Piecemeal conversion to residential development that breaks up any frontages and provides little benefit to the wider community meanwhile, will be resisted.</u></p> <p><i>Amend Figures 1 and 15 so all boundaries are consistent with those shown on the Schedule of Changes to the Post-submission Draft Policies Map (July 2020) – document CORE_027_V2 and the Schedule of Changes to the Policies Map (Sep 2020) – document CORE_026_V2</i></p>
MM18	Policy 16	<p><i>Amend clause B to read:</i></p> <p>B. All existing arts and cultural uses <u>and uses of cultural significance</u> will be protected <u>and proposals for enhancement will be supported in principle</u>. New <u>Proposals for new</u> arts and cultural uses will be supported in:</p> <ol style="list-style-type: none"> 1. Strategic Cultural Areas when they complement the existing cultural offer; and 2. the town centre hierarchy; and 3. commercial areas of the CAZ. <p>Outside of the CAZ, <u>new</u> arts and cultural uses will be of a scale and nature appropriate to the local context and of benefit to the local community.</p>

		<p><i>Amend clause G to read:</i></p> <p>G. New hotels <u>and conference facilities</u> will be directed to: <u>1. commercial areas of</u> the CAZ; other than in streets that have a predominantly residential character, and <u>2. to town centres that are</u> Ddistrict centres or higher in the town centre hierarchy. New conference facilities will be directed to the CAZ.</p> <p><i>Amend clause H to read:</i></p> <p>H. <u>Applications for e</u>Extensions <u>and upgrades</u> to existing hotels should be linked to the upgrading of the hotel and the application should consider their impact on the wider area <u>will have regard to impacts on the wider area. Development proposals should improve accessibility and enable the extended lifetime of buildings by incorporating principles and measures of sustainable design wherever possible. Development proposals should, where appropriate, reveal the historic significance of hotels located within heritage assets.</u></p> <p><i>Amend paragraph 16.13 to read:</i></p> <p>The CAZ is the centre of commerce and activity in London, served by excellent national and international public transport connections. It is therefore an appropriate location for hotels and conference facilities. Hotels <u>and conference facilities</u> may also be appropriate in all town centres (except local centres), where they enhance their role and function and there are no adverse impacts on the wider area, including on residential properties. When assessing proposals for new hotels, and hotel extensions <u>and conference facilities</u>, we will take into account the site location, relationship to neighbouring uses, scale of accommodation and facilities proposed (the number of bedrooms and nature of other services the hotel offers), highways and parking. <u>Proposals for extensions and upgrades to existing hotels will also consider how the sustainability and accessibility of the building can be improved. When located within heritage assets and where appropriate, development should better reveal the historic significance of the building.</u></p>
MM19	Policy 17	<p><i>Amend clause A to read:</i></p> <p>Proposals for food and drink and entertainment uses will be of a type and size appropriate to their location. The overconcentration of those uses will be <u>further</u> prevented where this <u>could</u> harms residential amenity, or the vitality and character of the local area <u>or the diversity that defines the role and function of the town centre.</u> Applications for entertainment uses will need to demonstrate wider benefits for the local community, where appropriate.</p> <p><i>Amend clause B to read:</i></p>

		<p>Public houses will be protected throughout Westminster, except where there is no reasonable prospect of its continued use as a public house, as evidenced by appropriate marketing for a period of at least 18 months.</p> <p><u>Replacement of ancillary spaces on upper floors to public houses, such as function rooms or accommodation, may be acceptable where it can be satisfactorily demonstrated that loss of this floorspace will not compromise the viability or function of the public house.</u></p> <p><i>Amend clause F to read:</i></p> <p>The use of premises and outdoor areas for shisha smoking will not take place under or adjacent to windows of existing residential properties. Any negative effects must be fully mitigated by incorporating measures into the design and operation <u>in exceptional circumstances may be permitted within the town centre hierarchy, provided any unacceptable impacts on public health and the amenity of the surrounding area (including residential properties, the pedestrian environment and the operational requirements of existing businesses in the vicinity) are adequately mitigated. Applicants will therefore be required to demonstrate how any negative impacts of the proposal can be mitigated through the implementation of a management plan for the premises.</u></p> <p><i>Amend paragraph 17.1 to read:</i></p> <p>Westminster has a vibrant entertainment sector, including a huge range of food and drink uses. This plays a vital role in supporting the visitor economy, providing local employment opportunities and contributing to London's world-city status. <u>Given the recent changes in the Use Classes Order the council cannot control growth of cafes and restaurants that are now in a new Class E. The focus of this policy will therefore be on other uses such as takeaways, shisha smoking bars and other drinking establishments that are sui generis uses.</u> Much of the entertainment sector is concentrated in the West End, but clusters also exist in other parts of the city, such as Edgware Road and Queensway / Bayswater. We are working with partners to prepare a vision for the Evening and Night Time Economy and support proposals that help us to achieve this vision, including by providing a more diverse offer. <u>Proposals for the provision of these mix of uses within the WERLSPA will be supported provided they do not lead to over-concentration owing to the impacts on servicing and amenity.</u></p> <p><i>Amend paragraph 17.5 to read:</i></p> <p><u>Whilst the council acknowledges that under the new Use Class Order public houses and other drinking establishments such as wine bars are sui generis, this policy specifically applies only to public houses. Although the public health risks of alcohol consumption are recognised, P</u>public houses can play an</p>
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	<p>important role as social hubs at the heart of communities, add to the diversity of commercial areas, and make a positive contribution towards townscape and local identity. They include many premises that have Best Bar None* status. The protection of public houses is supported by both national policy and the London Plan**.</p> <p><i>* Footnote: Best Bar None is an accreditation scheme promoting responsible management and operation of alcohol related premises.</i></p> <p><i>**[new footnote]: <u>See paragraph 92 of the NPPF; and Policy HC7 Protecting public houses of the London Plan.</u></i></p> <p><i>Amend paragraph 17.6 to read:</i></p> <p>Latest records indicate there are 439 public houses in Westminster, of which 87% are in conservation areas and 28% are listed. They can support the economy by providing direct employment, supporting food suppliers and the brewing industries, and helping make Westminster a desirable place in which to work and do business. Despite this, they are facing increasing threat of closure. Recent monitoring data shows that over recent years there has been an increasing loss of floorspace for drinking establishments. These include venues aimed at specific communities (such as LGBTI+), 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. <u>This policy essentially seeks to halt the loss of public houses through incorporating flexibility that differentiates between active public house use and ancillary upper floor space to allow the latter to be changed to other uses where it can be satisfactorily demonstrated that loss of this floorspace will not compromise the viability or function of the public house.</u></p> <p><i>Amend paragraph 17.10 to read:</i></p> <p>Shisha is a flavoured tobacco smoked through a waterpipe or hookah. Shisha smoking creates smoke containing chemicals which are linked to several life limiting diseases, including cancer, heart disease and respiratory disease, as recognised by Public Health England. Smoke free legislation means it cannot be smoked indoors in public places, but a licence for outdoor smoking is not required. <u>Shisha smoking is often a social activity, with people sharing waterpipes. This means that the outdoor areas of the premises offering shisha smoking are likely to be occupied by people wanting to smoke this type of tobacco. Although smoking any type of tobacco and under any circumstances is harmful, when many people smoke together and in the same area, the public health risks increase. Smoking material and burners needed for shisha smoking and secondary smoke from water pipes and fuel sources also pose a health risk to non-smokers present in the area. The council is committed to managing the concentration and impacts of any uses detrimental to public health throughout the city.</u></p>
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		<p><i>Amend paragraph 17.12 to read:</i></p> <p>The use of premises and outdoor areas for shisha smoking is We consider shisha bars a sui generis use, meaning that where an applicant seeks to change <u>the use of premises or outdoor areas for shisha smoking</u>, to a shisha bar planning permission will be required. Where this is sought, applicants will be required to demonstrate how any potential negative impacts of the proposal can be mitigated through the implementation of a management plan for the premises.</p> <p><i>Amend paragraph 17.13 to read:</i></p> <p>In addition to its direct health impact, Outdoor <u>shisha</u> smoking at shisha bars, which often occurs late at night, can harm residential amenity through increased noise, odour and fumes, particularly in areas with large concentrations of these uses. <u>This, in turn, can also have an impact on quality of life and public health.</u> A loss of retail units for shisha smoking to shisha bars can result in a change of character and undermine the vitality and viability function of established shopping areas. The use of outdoor tables, chairs, and charcoal burners can also block pavements making it more difficult for people to get around the city. We will <u>use planning conditions therefore to seek to control the positioning and the numbers of tables and chairs used for outdoors shisha smoking, and the opening hours of shisha bars the premises</u> and use planning conditions to secure the management of waste disposal and positioning of tables and chairs. Management arrangements will be required to safeguard residential amenity, and minimise disturbance <u>and negative impacts on the operational requirements of existing businesses in the vicinity and manage any negative impacts in the environment.</u> <u>The approach to new shisha is necessarily different from, for example, drink and entertainment uses because shisha smoking is not a licensable activity and does not therefore come within the control of statutory licensing regime. As such, any necessary control must be exerted through the planning process.</u> In addition, gGiven the amenity and public health impacts of shisha smoking, we are lobbying for increased licensing powers to control the proliferation of shisha bars.</p>
MM20	Policy 19 B	<p><i>Amend clause B to read:</i></p> <p>B. The improvement and expansion of Westminster's world-class higher educational institutions will be supported in principle, in recognition of the economic benefits they provide to Westminster, London and the UK. This includes proposals for the upgrading of existing, and provision of new, teaching and research facilities and the provision of purpose built student housing that meets the needs of students studying at higher education institution in Westminster.</p>
MM21	Policy 21	<p><i>Amend clause C to read:</i></p> <p>C. Proposals for new A3 restaurant/café uses or A4 drinking establishments will be considered with regard to</p>

		<p>their cumulative impact on the character of Soho's streets and mix of uses.</p> <p><i>Amend paragraph 21.5 to read:</i></p> <p>Changes of use to new A3 restaurant or café uses or A4 drinking establishments will be assessed in terms of their cumulative impact on Soho's streets. This will ensure that the mix and balance of uses in the area is maintained by preventing over-concentrations of A3 and A4 <u>these</u> uses. Although already prevalent in Soho, further clustering of these uses can have a detrimental impact on the area's overall mix and can lead to incremental changes to its character.</p> <p><i>Amend paragraph 21.7 to read:</i></p> <p>Although hotels are generally considered acceptable within the CAZ, within Soho, smaller scale or 'boutique' hotels are more appropriate due to Soho's existing character. Large-scale hotel facilities will not generally be considered acceptable within the SPA, as their larger floorplate requirements are likely to erode local character through the loss of smaller scale existing units, which will also displace other commercial uses, as well as having potential amenity and environmental impacts. Larger floorplate units are generally at odds with Soho's existing scale and grain. <u>We consider small-scale hotels, in a Soho context, to be those of fewer than 100 rooms.</u></p> <p><i>Insert new paragraph after paragraph 21.10 to read:</i></p> <p><u>Alongside policies in this Plan, development proposals within the Soho SPA will be assessed against the Soho and Chinatown Conservation Area Audit, supplementary planning documents, specific studies and the Soho Neighbourhood Plan.</u></p>
MM22	Policy 22	<p><i>Amend clause A to read:</i></p> <p>A. Developments<u>s</u> in the Mayfair and St James's Special Policy Areas (SPAs) will complement, support and enhance the character and status that <u>enhance the character and function</u> of both areas as centres for the art trade and luxury retail, <u>through the provision of additional floorspace for use as art galleries, antique trading or luxury retail, is encouraged.</u></p> <p><i>Delete clauses B and C</i></p> <p>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 within SPA will be resisted.</p>

		<p>C. The council will work with landowners to protect existing niche luxury and specialist A1 retail floorspace including antiques within both SPAs. Additional retail of this type that complements the character of either SPA will be supported.</p> <p><i>Amend paragraph 22.5 to read:</i></p> <p>Proposals for new development in either area should will demonstrate that it respects and complements the area's character and status function, given their contribution to central London's global appeal. Proposals for additional gallery floorspace, antiques trading, and luxury, bespoke and niche retail, are therefore welcomed. In seeking to protect existing character, it is recognised that existing art lawful A1 galleries and antique trading uses may be able to change to other A1 uses <u>a range of Class E (commercial, business and service) uses</u> without planning permission. We will however use our powers to ensure that any floorspace at risk through redevelopment or other substantial works requiring planning permission are re-provided in replacement or refurbished buildings, and that they will be subsequently protected by legal agreement.</p>
MM23	Policy 23	<p><i>Amend clause B to read:</i></p> <p>B. <u>Proposals for additional floorspace to upgrade or provide n</u>New medical and complementary facilities, patient care and patient accommodation, will be supported and existing floorspace protected. <u>subject to impact on townscape and heritage.</u> Its loss will only be permitted in the following exceptional circumstances</p> <p><u>C. Medical facilities that do not fall within Class E (commercial, business and service uses) as a result of being attached to the residence of the consultant or practitioner, will be protected, unless:</u></p> <ol style="list-style-type: none"> 1. Where there is no reasonable prospect of its continued use for medical use or complementary facilities, as evidenced by vacancy and appropriate marketing for a period of at least 12 months; and 2. The proposal is for high quality residential development that does not materially affect the character and function of the area as a centre of medical excellence.
MM24	Policy 24	<p><i>Amend clause A to read:</i></p> <p>A. Development in the Savile Row Special Policy Area (SPA) will complement and enhance its continued role as an international centre of excellence for bespoke tailoring, <u>supported by complementary Class E (commercial, business and service uses) floorspace that respects townscape and heritage value.</u></p> <p><i>Amend clause B to read:</i></p>

		<p>B. New bespoke tailoring uses will be supported throughout the SPA, particularly at lower floor levels. Any new retail or complementary town centre uses will be of a scale that respects the unique role, character and function of the area. C. <u>Proposals for other uses that would result in t</u>he net loss of tailoring floorspace from the SPA will be resisted, <u>unless this relates to floorspace benefiting from temporary consent for tailoring purposes.</u></p> <p><i>Insert new clause C:</i></p> <p><u>C. Where new Class E (commercial, business and service uses) incorporates retail floorspace, provision of a size, type and format that complements the unique character and function of the SPA is encouraged. Redevelopment proposals that would result in the replacement of multiple individual stores with large format retail will be resisted.</u></p> <p><i>Amend paragraph 24.1 to read:</i></p> <p>The cluster of bespoke tailoring establishments in Savile Row has been established for centuries. It is globally synonymous with premium bespoke tailoring. Premises on the east side of Savile Row include a mix of workrooms and retail elements that are both visible from street level, and as such are categorised as <i>sui generis</i>. To the west of Savile Row A4 retail uses dominate, whilst to the north the mix of uses includes art galleries and retail uses complementary to the predominant tailoring uses in the area. Some office space is also interspersed throughout the area, <u>meaning alongside its tailoring function, the area includes a range of Class E (commercial, business and service) uses), reflecting its location within the CAZ.</u> The rich townscape and heritage value of the area is recognised through conservation area designations.</p> <p><i>Amend paragraph 24.3 to read:</i></p> <p>The unique status of the area as a specialist cluster is acknowledged in the London Plan. Given its status, demand for tailoring floorspace within the area remains strong, and the presence of existing bespoke workshops within premises make the area distinct from other luxury retail nearby. To enable the tailoring industry to continue to thrive and grow within this globally recognised destination, the net loss of dedicated tailoring floorspace from the area will be resisted <u>and the provision of additional dedicated tailoring floorspace is supported. Where floorspace not previously used for tailoring purposes in the SPA becomes vacant (e.g. an existing retail unit), the use of temporary permissions can be an effective way of securing further clustering of tailoring uses, whilst still offering flexibility over the future use of such space.</u></p> <p><i>Amend paragraph 24.4 to read:</i></p>
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		<p>Any n<u>New commercial retail</u> development within the SPA <u>that is small scale, in the fashion industry and offers bespoke services, should will</u> complement the role and character of the area, <u>and is encouraged where it would not result in the net loss of dedicated tailoring floorspace. In contrast, large and flagship high street stores selling a wide range of products over multiple floors and generating high levels of footfall are more suited to nearby principal shopping streets with wider pavements designated as part of the West End International Centre or as CAZ Retail Clusters; where such retail formats are supported under Policy 15. Any proposals for the wholesale redevelopment of existing retail premises that would require planning permission should therefore respond to the unique character and offer of the tightly defined SPA.</u>, which because of narrow pavements, lends itself to specific purpose visits for bespoke items, rather than high footfall retail and flagship stores associated with principal shopping streets nearby such as Regent Street and Oxford Street. Legal agreements <u>Conditions</u> will therefore be used to restrict the size of individual stores, in order to preserve the SPA's inherent character. <u>extent to which any new Class E (commercial, business and service) development can be occupied by large format retail.</u> The average size of existing retail units in the SPA is 266 sq m. As such, stores of up to 300 sq m gross internal floorspace will normally be considered reasonable. <u>Other Class E (commercial, business and service) uses that are of a scale and design that respect local townscape, and can complement the commercial nature of the area, are in principle supported - as uses such as cafés and restaurants can increase dwell time, and additional office floorspace can contribute to the strategic office function of the CAZ.</u></p>
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CONNECTIONS

Ref.	Section of plan	Proposed modification
MM25	Policy 25	<p><i>Amend clause C part 5 to read:</i></p> <p>Major development should provide or financially contribute towards creating well-connected, high-quality, convenient, safe cycle infrastructure and routes <u>where necessary to mitigate its impacts.</u></p>
MM26	Policy 26	<p><i>Amend clause D part 3 to read:</i></p> <p>meet the cycle parking and cycle facilities standards in the <u>London Plan</u> Appendix 2. Where it is not possible to provide suitable short-stay cycle parking off the public highway an appropriate on-street location should be considered provided it does not conflict with improvements to and the quality of the public realm;</p> <p><i>Amend paragraph 26.10 to read:</i></p>

		<p>Provision of cycle parking and storage facilities, as well as facilities for cycle hire, are essential in order to encourage this mode of transport. <u>Showers, changing facilities and lockers should be provided for cyclists at all new workplaces, places of further and higher education, hospitals and health facilities. At least one shower should be installed for every 20 cycle parking spaces provided and one locker provided per cycle space. These facilities should be conveniently located in relation to the cycle parking spaces and accessible to all staff (and students where applicable).</u> Therefore, the needs of cyclists should be given careful consideration during the design of new developments as provision of <u>cycle</u> parking, and storage space <u>as well as supporting cycle facilities</u> is intrinsically linked to the quality of the public realm.</p>
MM27	Policy 27	<p><i>Amend clause C part 1 to read:</i></p> <p>make a financial contribution towards improvements to the public realm which facilitates <u>access and</u> improvements to the operation of <u>all sustainable transport modes</u> the bus network and associated infrastructure <u>through improvements to the public realm;</u></p> <p><i>Amend paragraph 27.5 to read:</i></p> <p>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 A suitable new location (or locations) for a coach station must support multi-modal interchange while minimising amenity, traffic and environmental impacts. We recognise that the best location(s) may be beyond Westminster's boundary. This approach is consistent with the commitment in the London Plan and Mayor's Transport Strategy that the Mayor will identify and deliver replacement coach station facilities to provide easier access to the coach network, while retaining good access to central London for coach operators.</p>
MM28	Policy 28	<p><i>Amend clause A to read:</i></p> <p>A. The parking standards in <u>the London Plan</u> Appendix 2 will apply to all developments s. except in parking zones B and F where the following maximum residential standards will apply:</p> <p>1. Up to 0.4 spaces per residential unit and clause B and D to H of Draft London Plan policy T.6.1 detailed in Appendix 2.</p> <p>2. All new parking <u>these</u> spaces should provide active provision for electric charging vehicles. while the remaining spaces should incorporate a passive provision.</p> <p><i>Amend clause B to read:</i></p> <p>B. In zones B & F w<u>Where</u> on-site parking is delivered applicants will:</p>

		<ol style="list-style-type: none"> 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 4. let, rather than sell, parking spaces to new residents <u>of new developments</u> on a short-term basis, <u>with spaces allocated to individual addresses or property numbers.</u> <p><i>Amend clause C to read:</i></p> <p>C. The council will apply the maximum non-residential car parking standards set out in <u>Appendix 2 the London Plan.</u></p> <p><i>Amend clause F to read:</i></p> <p>F. Where sites are redeveloped, existing parking provision must be reduced to meet the parking standards in <u>Appendix 2 the London Plan</u> unless there is site specific justification to re-provide an element of the existing parking. On housing estate renewal schemes, parking provision may be retained or re-provided where it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. existing occupiers with established parking spaces or permits are to return to the site once the development is completed and that the retained or re-provided parking is for those residents only; and 2. there is evidence of adequate capacity within the relevant controlled parking zone if the re-provided parking is to be on-street; and 3. the retained or re-provided parking is delivered as part of an overall package of measures improving legibility, including walking and cycling routes, and making improvements to the public realm. <p><i>Amend title prior to paragraph 28.4 to read:</i></p> <p><u>On-Site</u> Parking</p> <p><i>Delete paragraph 28.4 and re-number subsequent paragraphs accordingly.</i></p> <p><i>Amend paragraph 28.5 to read:</i></p> <p>Our approach to residential car parking conforms to the 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-</p>
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		<p>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. <u>The standards in Table 10.3 ‘Maximum residential parking standards’ in the 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 London Plan also apply in Westminster.</u></p> <p><i>Amend paragraph 28.6 to read:</i></p> <p>Given the high levels of public transport provision and accessibility to jobs, leisure and shopping facilities in Westminster, we have taken the view that new development should be predominantly car free. Notwithstanding, there will always be a need to ensure that a lack of provision does not result in significant increases in demand for on-street parking in the vicinity of the 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. <u>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 parking on Westminster’s streets. As a minimum, 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-resident car parking spaces and other measures agreed with the council.</u></p> <p><i>Insert new paragraphs after paragraph 28.6 to read:</i></p> <p><u>Where on-site parking is provided in line with clauses 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 London Plan standards. We advocate the letting rather than selling of car park spaces to residents in new developments 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.</u></p> <p><u>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,</u></p>
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		<p><u>off-street parking will be provided by the applicant in a publicly accessible location.</u></p> <p><u>Cycle and Motorcycle parking</u></p> <p><u>Cycle parking should be provided in accordance with the London Plan where they do not conflict with public realm enhancements. Motorcycle / moped parking should also be provided in accordance with the London Plan standards.</u></p> <p><u>Cycle facilities</u></p> <p><u>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)</u></p> <p><i>Delete paragraphs 28.7 – 28.10 and re-number subsequent paragraphs accordingly.</i></p> <p><i>Amend paragraph 28.14 to read:</i></p> <p>The London Plan seeks to encourage, <u>Although the policy encourages</u> car-free residential development, but the London Plan standards are not strictly car-free if residents can acquire-<u>will still be able to apply for</u> 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. <u>The eligibility criteria for on-street residents' parking permits will be kept under review.</u> Therefore, in residents' parking Zone B 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 under review.</p>
MM29	Policy 29	<p><i>Amend clause A to read:</i></p> <p>A. Given the increasing demands on existing highway space, the council will resist the loss of highway <u>land, particularly footways</u>. In cases involving the setting back of buildings, the council will seek to ensure the <u>designation of</u> resulting frontage land is designated as highway.</p> <p><i>Amend clause B to read:</i></p> <p>B. New highway accesses should minimise the amount of <u>footway, cycling space and</u> kerb space lost for parking and / or servicing and should ensure no loss of street furniture.</p>

		<p><i>Amend paragraph 29.2 to read:</i></p> <p>The loss of highway land will not generally be acceptable, as reducing space on the highway for pedestrians and vehicles impedes movement and traffic flow, worsening congestion and discouraging active transport modes such as walking and cycling. <u>However, the council recognises that there may be circumstances where a minor loss of highway land may be appropriate to deliver benefits.</u> By designating frontage as highway land where buildings are set back from the highway, we will be able to carry out improvements such as footway widening to encourage active travel opportunities and smooth pedestrian flows.</p> <p><i>Amend paragraph 29.3 to read:</i></p> <p><u>Footway will not be reduced as a result of changing building lines following redevelopment to allow adequate space for pedestrians. Likewise, w</u>Where new developments require vehicular access to the highway, they should minimise the loss of kerb space for parking where this will lead to increased congestion on local residential side roads <u>and not result in loss of footway or cycling space.</u></p>
MM30	Policy 31	<p><i>Amend clause C to read:</i></p> <p>C. The council will support the continued roll out of on street electric charging points for use by the general public across Westminster. in line with the emerging Westminster Electric Vehicle Strategy (2019).</p> <p><i>Amend paragraph 31.6 to read:</i></p> <p>Fully electric and hybrid vehicles are becoming more prevalent on London's roads and Westminster has the highest number of new plug-in vehicles being registered in London, with new registrations currently exceeding 1,000 per quarter. Westminster currently has 153 off-street electric vehicle charging bays, comprising 109 spaces and 44 car club bays. Many developments also provide off-street electric vehicle charging, although usually for private use only. In addition to the wider roll out of on-street charging facilities accessible to the general public, where developments propose new car parking, charging provision should be made in accordance with the standards set out in Policy 28 Appendix 2. Where proposed, a higher level of active provision of charging points than required by the parking standards will be supported. This will enable people to continue to take up electric vehicles, thereby helping improve Westminster's air quality. It is also important to ensure suitable fast-charge points in off-street delivery / servicing bays for goods vehicles are placed in appropriate locations, given the high volumes of freight, servicing and delivery traffic in Westminster.</p>
MM31	Policy 32	<p><i>Amend clause G to read:</i></p> <p>G. Proposals for permanent moorings on the River Thames will:</p>

		<p>1. enhance the character and appearance of the riverside and be open to the public;</p> <p>2. not compromise views of the river, the World Heritage Site and other heritage assets and their settings; and</p> <p>3. not hinder navigation or jeopardise the long-term use of pier recesses;</p> <p><u>4. not compromise the integrity of the River Thames flood defences or the ability to raise them in the future in line with the Thames Estuary 2100 Plan; and</u></p> <p><u>5. not negatively impact the intertidal foreshore defined and protected within the London Biodiversity Action Plan and, where feasible, provide improvements to intertidal habitats. Where required, developers should provide appropriate mitigation measures that will preserve the continued dynamism and biodiversity value of the foreshore.</u></p>
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ENVIRONMENT

Ref.	Section of plan	Proposed modification
MM32	Policy 33	<p><i>Amend clause B to read:</i></p> <p>B. Major developments in Opportunity Areas and Housing Renewal Areas and those subject to an Environment Impact Assessment should achieve Air Quality Positive status <u>must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach.</u></p> <p><i>Amend clause C to read:</i></p> <p>C. All other m<u>M</u>ajor developments and <u>any</u> developments incorporating solid biomass boilers or Combined Heat and Power (CHP) should be at least Air Quality Neutral.</p> <p><i>Re-order clauses B and C so that clause C appears as B, and vice versa.</i></p> <p><i>Amend paragraph 33.2 to read:</i></p> <p>We seek to tackle poor air quality in an integrated way in this Plan, for instance through our approaches to design and construction, green infrastructure, energy efficiency and sustainable travel. Together with the wider measures set out in our Air Quality Strategy and Action Plan (2013-2019 - 2024) <u>and those set out in the Mayor's London Environment Strategy</u>, this will support the ambitions and actions in the Government's Clean Air Strategy (2019).</p>

		<p><i>Amend paragraph 33.3 to read:</i></p> <p>We <u>have</u> adopt<u>ed</u> the approach to Air Quality Positive <u>air quality positive</u> and <u>air quality N</u>neutral development approach as set out in the Draft London Plan. Large masterplanning developments in particular have the potential to include methods to improve local air quality, which is reflected in the policy requirement for Air Quality Positive <u>an air quality positive approach</u>.</p> <p><i>Amend paragraph 33.4 to read:</i></p> <p>All other major development 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.</p> <p><i>Amend paragraph 33.5 to read:</i></p> <p><u>If air quality neutral status cannot be achieved, the Mayor's Sustainable Design and Construction SPG sets out the actions that should be considered.</u> When all measures to achieve Air Quality Neutral status have been exploited, financial contributions to offset the impact of the development on air quality may be considered as a final intervention. The process and calculation for this process <u>are set out in Section 5 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD).</u> We will be set out <u>updated guidance</u> in a forthcoming supplementary planning document <u>following an expected review of the AQNPSD.</u></p>
MM33	Policy 34	<p><i>Amend clause A to read:</i></p> <p>A. The council will make sure that quality of life <u>and</u> health and well<u>being</u> <u>of existing and future occupiers</u>, and the natural environment, are not adversely affected by harmful pollutants and other negative impacts on the local environment.</p>
MM34	Policy 35	<p><i>Amend clause G to read:</i></p> <p>G. <u>Developments should achieve biodiversity net gain, wherever feasible and appropriate.</u> Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats.</p> <p><i>Amend paragraph 35.8 to read:</i></p>

		<p>The five Royal Parks in the city (Regent's Park, Kensington Gardens, Green Park, Hyde Park and St James's Park) are designated Metropolitan Open Land (MOL) and are therefore afforded the same protection as green belt land. The Royal Parks constitute close to 90% of Westminster's open space and are a vital part of the character of the city. We will work with partners and applicants to preserve the open character of the Royal Parks and enhance the value they bring for London. <u>Any development affecting the Royal Park boundaries must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances consistent with the requirements for changes to MOL in national policy and the London Plan.</u></p> <p><i>Update Figure 28 to show the triangular open space in front of the QEII centre as a private rather than public open space.</i></p>
MM35	Policy 36	<p><i>Amend clause G to read:</i></p> <p>G. All existing flood management infrastructure will be protected, including access for maintenance. <u>Wherever possible, an undeveloped buffer zone of 16m should be maintained around flood defence structures, including buried elements of the flood defence.</u></p> <p><i>Amend clause H to read:</i></p> <p>H. Improvements to flood defences will be secured through planning conditions and / or legal agreements where the size, type and / or location of development impacts on flood risk. <u>Development should not limit future raising of flood defences outlined in the Thames Estuary 2100 Plan.</u></p> <p><i>Insert new clause I to read:</i></p> <p><u>I. Where appropriate, planning permission for developments which result in the need for off-site upgrades to the water or sewerage network, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.</u></p> <p><i>Re-name clause I as clause J.</i></p> <p><i>Insert new paragraph after paragraph 36.3 to read and re-number subsequent paragraphs accordingly:</i></p> <p><u>In addition, sleeping accommodation below the modelled breach flood water level in areas identified as being at risk of flooding in the event of a breach of the Thames Tidal Flood Defences, as set out in Environment Agency guidance, will not be supported.</u></p>

		<p><i>Amend paragraph 36.5 to read:</i></p> <p>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. <u>Development within 16m of a tidal flood defence will only be acceptable if it can be demonstrated that the defences can be raised and maintained for the lifetime of the development.</u> 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.</p> <p><i>Insert new paragraph after paragraph 36.9 to read:</i></p> <p><u>Wastewater infrastructure</u></p> <p><u>Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint, the council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</u></p> <p><i>Amend Figure 30 so all boundaries are consistent with those shown in the Schedule of Changes to the Policies Map (Sep 2020) – document CORE_026_V2 and the Post-submission Draft Policies Map (July 2020) – document CORE_027_V2</i></p>
MM36	Policy 37	<p><i>Amend clause B to read:</i></p> <p>B. All development proposals should follow the principles of the Mayor of London's energy hierarchy. Major development should <u>be net zero carbon and</u> demonstrate through an energy strategy how <u>this target</u> the carbon reduction targets set out in local policy or the London Plan, whichever is the greatest, can be achieved.</p> <p><i>Amend paragraph 37.1 to read:</i></p> <p>We recognise that the level of growth in the city will have a cumulative impact on energy demand and associated carbon emissions. It is essential that developments utilise every opportunity to reduce emissions now to limit the extent of future climate change. Our priority is for new developments to achieve <u>net</u> zero carbon emissions. <u>Net zero carbon means reducing operational emissions</u> from all regulated uses (i.e. space heating, lighting, hot water and ventilation), <u>and minimising both annual and peak emissions. Developments should also and</u></p>

		<p>explore routes towards net zero carbon across the development life-cycle to avoid a legacy of emissions to be addressed in the future.</p> <p><i>Amend paragraph 37.2 to read:</i></p> <p>We recognise that a large portion of Westminster's carbon emissions are produced by existing buildings. We will therefore support proposals that seek to sensitively refurbish or retrospectively improve the performance of current buildings to reduce their energy use and improve comfort. Interventions to upgrade historic buildings will be undertaken sensitively in recognition of their heritage value. <u>Applicants should refer to our latest guidance on sustainable retrofitting.</u></p> <p><i>Amend paragraph 37.5 to read:</i></p> <p>Developments that are unable to achieve the carbon targets set out in policy on-site will need to <u>calculate their emissions</u> offset their shortfall <u>in tonnes of carbon and offset</u> via a cash in lieu payment. <u>The value of the payment will be determined by multiplying the emissions shortfall by the local cost of carbon over a period of 30 years.</u> in accordance with the methodology outlined in the London Plan and Mayor of London's Sustainable Design and Construction SPG (2014) reflecting the local cost of carbon, where appropriate. Carbon offset funding will then be allocated to projects that will reduce carbon emissions elsewhere in Westminster. <u>Details of how the Westminster Carbon Offset Fund contribution will be calculated and administered will be set out in the Planning Obligations and Affordable Housing SPD.</u></p> <p><i>Amend paragraph 37.6 to read:</i></p> <p>Applicants are strongly encouraged to engage with us through the pre-application advice process to discuss how they are going to achieve the carbon reduction figure, especially when it is a combination of physical and financial measures. Details of how the Westminster Carbon Offset Fund contribution will be calculated and administered will be set out in a supplementary planning document</p>
MM37	Policy 38	<p><i>Insert new clause A to read and re-name subsequent clauses accordingly:</i></p> <p><u>A. The council will promote the Circular Economy and contribute to the London Plan targets for recycling and for London's net self-sufficiency by 2026.</u></p> <p><i>Amend clause B to read:</i></p> <p>B. Major developments and developments that produce hazardous, medical and / or commercial catering waste are required to provide appropriate waste management facilities on-site. <u>Developers are required to</u></p>

		<p><u>demonstrate through a Circular Economy Statement, Site Environment Management Plan and/or associated Site Waste Management Plan, the recycling, re-use, and responsible disposal of Construction, Demolition and Excavation waste in accordance with London Plan targets and the council's Code of Construction Practice.</u></p> <p><i>Amend clause C to read:</i></p> <p>C. Existing waste management facilities shown on Figure 33 will be protected. <u>Any proposals for new waste management facilities will be assessed against the criteria set out in the London Plan and national policy.</u></p> <p><i>Insert new clause E to read:</i></p> <p><u>E. The council will continue to collaborate with other Waste Planning Authorities in the management of its waste and monitor its waste exports.</u></p> <p><i>Amend Paragraph 38.1 to read:</i></p> <p>Waste management is one of the greatest challenges for a growing city, which is also transitioning to a circular economy. <u>Westminster produces more than 180,000 tonnes of waste per year.</u> Commercial and household waste collections add up to more than one million per week. As a result of being the commercial centre of London we produce the highest level of commercial waste in the capital. <u>Households, businesses, institutions and building projects all generate waste in Westminster and the council has a duty to plan for the management of seven waste streams and to drive waste up the waste hierarchy. The seven waste streams include Local Authority Collected Waste (LACW), Commercial & Industrial (C&I) waste, Construction, Demolition and Excavation (CD&E) waste, hazardous, agricultural, low level radioactive waste and waste water.</u></p> <p><i>Insert new paragraphs following paragraph 38.1 to read (and re-number subsequent paragraphs accordingly):</i></p> <p><u>The council will contribute to the London Plan target of net self-sufficiency by 2026 by planning for Westminster's apportionment targets. The council has reached an agreement with the London Borough of Bexley to use part of its surplus capacity to meet Westminster's 2.3% waste apportionment targets (LACW and C&I waste streams) as set out in the London Plan*. This arrangement has been informed by a Waste Data Study (2020) which provides an understanding of the borough's waste need and has been formalised in a Statement of Common Ground which is included in an appendix to the study. The council has the aspiration to join the Southeast London Joint Waste Planning Group to plan for waste collectively. The London Borough of Bexley is already part of that group.</u></p>
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		<p><i>*[new footnote]: <u>Table 9.2 in Policy SI8 of the London Plan</u></i></p> <p><u>The council will contribute towards meeting London Plan recycling targets. These include 65% for 'municipal' waste by 2030, 95% for reuse/recycling/recovery for Construction and Demolition waste and 95% beneficial use for excavation waste. These are London-wide targets and Westminster will contribute in its capacity as a waste authority by implementing the municipal waste strategy and in its capacity as a planning authority by requiring developers to meet the recycling and beneficial use targets for construction, demolition and excavation (CD&E) waste in the London Plan and provide sufficient space for segregating waste in new developments. Circular Economy Statements should be submitted for referable applications in line with London Plan policy SI7 to demonstrate how CD&E recycling and beneficial use targets will be met. 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 CD&E 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 CD&E waste, both through on-site recycling and re-use and on-site waste processing prior to disposal.</u></p> <p><u>Agricultural waste is composted in the City's Royal Parks together with agricultural waste imports from other boroughs and no additional capacity is required for such waste. The City of London Corporation provides a Hazardous Waste Collection and Disposal Service, HWCDS, to London residents in all London Boroughs (except 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 only a very small amount of low-level radioactive waste is generated in Westminster, so no additional facilities are required for these waste streams.</u></p> <p><i>Amend paragraph 38.2 to read:</i></p> <p>Our strategic focus is on waste reduction and recycling in the city. We are committed to ensuring that waste is managed appropriately and efficiently in the city. Recent evidence has shown that Westminster has no capacity. <u>industrial land suitable</u> 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. <u>Any proposals for waste management facilities will be assessed against the criteria set out in the London Plan SI8 and National Planning Policy for Waste Appendix B.</u> We will work with local partners and other London boroughs to make arrangements to pool the waste apportionments set by the London Plan to meet our strategic waste planning duties.</p> <p><i>Amend Paragraph 38.3 to read:</i></p>
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		<p>Developments should provide adequate segregated waste storage facilities that are fully integrated into the design of the scheme, <u>both for individual units and communal storage areas ready for collection. The council's Recycle and Waste Storage Requirements guide (April 2019*), provides applicants with guidance on how it expects this to be done including the installation of balers and compactors within the development as required. This also supports the requirements for</u> the amalgamation of facilities in an area may be required in locations that demand an area specific approach to waste collection management. Where uses generate specialist types of waste, appropriate facilities to manage these waste types should be provided on-site.</p> <p><i>*[new footnote]: www.westminster.gov.uk/waste-storage-planning-advice</i></p> <p><i>Insert new paragraph after paragraph 38.3 to read:</i></p> <p><u>The Waste Data Study (2020) provides detail on waste imports and exports. It explains that Westminster is a net exporter of waste, with all of the local authority collected and commercial and industrial waste going to facilities in London including Southwark and Lewisham. Part of Westminster's Construction, Demolition and Excavation waste and Hazardous waste is managed in facilities outside of London. We have agreed Statements of Common Ground with the Waste Planning Authorities whom receive a strategic amount of Westminster's waste to agree this can continue or highlight any issues where waste exports may not be able to continue and agree that alternative destinations for CD&E waste are available. We will continue to monitor waste exports and engage with these authorities under the duty to co-operate. Monitoring indicators include the amount, type and destination of Westminster's waste exports.</u></p>
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DESIGN AND HERITAGE

Ref.	Section of plan	Proposed modification
MM38	Policy 39	<p><i>Amend clause D part 3 to read:</i></p> <p>3. optimising resource and water efficiency;</p> <p><i>Amend paragraph 39.10 to read:</i></p>

		<p>As new developments are large consumers of resources and materials the possibility of sensitively refurbishing or retrofitting buildings should also be considered prior to demolition and proposals for substantial demolition and reconstruction should be fully justified on the basis of whole-life carbon impact, resource and energy use, when compared to the existing building. All development should ensure the reduction, reuse or recycling of resources and material and minimise energy use and emissions that contribute to climate change. <u>As Westminster falls within an area classified as “seriously” water stressed, all development should maximise water efficiency. Residential development should meet the optional water efficiency requirement of 105 litres or less per person/day in line with Policy SI5 of the London Plan. This will be secured by condition.</u></p>
MM39	Policy 40	<p><i>Amend clause B to read:</i></p> <p>B. Development must optimise the positive role of the historic environment in Westminster’s townscape, economy and character <u>sustainability</u>, and will:</p> <ol style="list-style-type: none"> 1. ensure heritage assets and their settings are conserved and enhanced, <u>as in a manner</u> appropriate to their significance; 2. secure the conservation and continued beneficial use of heritage assets through their retention and sensitive adaptation which will avoid harm to their significance, while allowing them to meet changing needs <u>and mitigate and adapt to climate change</u>; 3. place heritage at the heart of place making and good growth, maintaining the unique character of our heritage assets and delivering high quality new buildings and spaces which enhance their settings. <p><i>Amend clause D to read:</i></p> <p>D. Development will protect the <u>skyline, prominence and iconic</u> silhouettes of the Palace of Westminster and Westminster Abbey and will protect and enhance <u>identified</u> significant views out of, across and towards the World Heritage Site.</p> <p><i>Amend clause E to read:</i></p> <p>E. The council will work with partners to promote the use, management and interpretation of the site in ways that protect, enhance and better communicate its OUV. <u>The council will commit to lead the production and review of an updated World Heritage Site Management plan.</u></p> <p><i>Amend clause F to read:</i></p> <p>F. Applicants will be required to demonstrate that any impacts of their proposals on the World Heritage Site or its setting have been fully assessed, <u>informed by</u> using Heritage Impact Assessment methodology <u>and that any harm, including cumulative harm, has been avoided or justified.</u></p>

		<p><i>Amend clause G to read:</i></p> <p>G. Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the original building and protecting or, where appropriate, restoring original <u>or significant</u> detail and significant historic fabric.</p> <p><i>Amend clause K to read:</i></p> <p>K. Development will preserve or enhance the character and appearance of <u>Westminster's</u> conservation areas and protect their settings. Features that contribute positively to the significance of conservation areas <u>and their settings</u> will be retained <u>conserved</u> and opportunities taken to enhance them <u>conservation areas</u> and their settings, wherever possible.</p> <p><i>Amend clause Q to read:</i></p> <p><u>REGISTERED HISTORIC PARKS AND GARDENS</u></p> <p>Q. Proposals affecting Westminster's <u>registered</u> historic parks, gardens and open spaces will safeguard their <u>special</u> historic <u>interest</u>, integrity, character and appearance, and protect their settings and significant views from and towards these spaces.</p> <p><i>Amend Paragraph 40.16 to read:</i></p> <p>Demolition or substantial demolition of unlisted buildings that make a positive contribution to a conservation area will be resisted unless it can be demonstrated that the public benefits of the proposals, including the quality of the replacement building, outweigh the case for retention of the building. Any replacement buildings in a conservation area must respect and seek to enhance its character and appearance. In some circumstances, demolition behind retained facades can provide a way to protect facades of townscape merit while allowing new accommodation to be developed behind this and may be acceptable where the overall integrity of unlisted buildings is maintained in street views <u>retaining side or rear elevations or roofscapes of townscape value. In all cases, we will only allow demolition where proposals for the future redevelopment of the site have been approved and their implementation assured by planning condition or agreement, to avoid harmful gaps occurring within the townscape as a result of empty plots.</u></p> <p><i>Amend Paragraph 40.27 to read:</i></p>
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MM40	Policy 41	<p><i>Amend clause E to read:</i></p> <p><u>ROOF EXTENSIONS</u></p> <p>E. 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 and <u>Roof extensions will be supported in principle where they do not impact adversely on heritage assets and should</u> fulfil one of the following criteria:</p> <ol style="list-style-type: none"> 1. the application site forms where part of a terrace or group <u>already characterised by</u> where a variety of roof additions or alterations, <u>be of appropriate design which follows</u> create an established form mixed pattern and further development of a similar form would not cause additional harm or would help to unify <u>the architectural character of the existing terrace or</u> a group of buildings and townscape; or 2. in the case where part of a terrace or group of unlisted buildings which has <u>with</u> an existing roof line unimpaired by <u>roof</u> extensions, the development would take a coordinated approach, adding roof extensions of consistent and appropriate design to each property <u>across</u> within the complete terrace or group; or 3. in other locations where the proposed roof form is <u>be</u> of appropriate design, sympathetic to the architectural character of the <u>existing</u> building and does not cause harm to amenity or heritage assets. <p><i>Delete clauses F and G and rename subsequent clauses accordingly.</i></p> <p><i>Amend paragraph 41.11 to read</i></p> <p>If properties affected form part of a group or terrace that remain largely unaltered or have a historic or distinctive roofscape integral to the architectural character of that building, further upward extension may be unacceptable, and the design of development proposals will need to be especially carefully considered. Where a terrace retains a uniform roofline with no roof extensions, the addition of one roof extension or multiple roof extensions of different designs can cause harm to the appearance of the roofscape. However, we will consider applications which would take a coordinated approach, adding roof extensions of consistent design to a complete terrace or group of unlisted buildings with a uniform roofline. <u>This will typically be on Georgian and Victorian terraces where mansard roof extensions can be accommodated behind a parapet. In such cases we will require extensions across the whole terrace group to be implemented at one time and this may be secured by</u></p>

		<p><u>legal agreement.</u> Upwards extension will usually be inappropriate where a mansard or other later roof extension already exists.</p> <p><i>Amend Paragraph 41.12 to read:</i></p> <p>While one additional storey will <u>often</u> usually be most appropriate, larger extensions of more than one storey may be appropriate in certain locations, <u>particularly in commercial locations with more varied townscape character.</u> Extensions which will deliver commercial floorspace that helps meet growth targets are most likely to be appropriate within the identified growth areas of <u>including</u> the Opportunity Areas, <u>in the International Centres of the West End and Knightsbridge and the Queensway/ Westbourne Grove Major Centre, and in other commercial locations on the Transport for London and Strategic Road networks</u> in designated town-centres or on major routes which are characterised by a larger scale of townscape. In these locations more than one storey will be supported where it is demonstrated it can be designed to minimise harm to townscape, amenity and heritage assets and will help fulfil growth targets. This will depend on townscape context. Not all of the buildings within areas identified will be suitable for roof extensions and there may be other commercial locations across the city where larger roof extensions can be accommodated. 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 and will be sympathetic to age and character of the building and townscape.</p>
MM41	Policy 42	<p><i>Amend clause A to read:</i></p> <p><u>A. Tall buildings are defined as buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline. In all locations proposals for tall buildings will need to satisfy both the general principles in clause B and relevant locational principles in clauses C and D (and for Housing Renewal Areas, Policy 43).</u> Westminster is not generally suitable for tall buildings. Developments significantly higher than their surroundings will need to demonstrate that building higher is the only way to make the most efficient use of the site.</p> <p><i>Delete clauses B and C and re-name subsequent clauses accordingly.</i></p> <p><i>Amend clause E to read:</i></p> <p>LOCATIONAL PRINCIPLES</p> <p>E. Development of tall buildings may be acceptable within the Paddington Opportunity Areas, Victoria Opportunity Areas, Marylebone flyover / Edgware Road junction and the Housing Renewal Areas. Provided in the first instance they comply with</p>

	<p>the general principles under clause DB. These principles need to be cross-referenced against the area specific design principles set out below, and for the Housing Renewal Areas, policy 43 and with site-specific guidance set out in the forthcoming Site Allocations Development Plan Document:</p> <p>PADDINGTON OPPORTUNITY AREA</p> <p>There may be potential for further tall buildings in this area that complement and help to frame the setting of Paddington Basin and contribute to the quality and character of the existing cluster.</p> <p>Building heights in Paddington should step down from the central location/high point at One Merchant Square</p> <p>The prevailing context height for the wider Paddington area is identified as 6 residential storeys (20m) with a varied context. Tall buildings within this area of 2 to 3 times this context height may be appropriate.</p> <p>MARYLEBONE FLYOVER / EDGWARE ROAD JUNCTION</p> <p>Tall buildings may be appropriate to mark <u>at</u> the junction of the flyover and Edgware Road but must be designed to relate to and complement each other and help to frame this area as a gateway junction.</p> <p>The height of any tall building in this location must step down significantly from, and be subordinate to, those in the Paddington Basin cluster. They must also be slender and elegant in their form. The acceptability of a tall building proposed in this area depends on the quality of its design, reflecting its role as a local landmark.</p> <p>The prevailing context height in this area is 6 residential storeys <u>(20m)</u> but as it sits within a varied context. Tall buildings of 2 to 3 times the context height may be appropriate.</p> <p>VICTORIA OPPORTUNITY AREA</p> <p>There may be potential for further tall buildings in this area that complement and help to frame the setting of Victoria Station and Victoria Street and contribute to the quality and character of the existing cluster.</p> <p>Any tall buildings in this area must not cause harm to the Outstanding Universal Value of the World Heritage Site and its setting or breach its protected silhouette and must be sensitive to the other listed buildings, conservation areas, registered parks and gardens.</p> <p>The prevailing context height in Victoria is 6 residential storeys (20m) with a varied context. Tall buildings in this area of 2 to 3 times the context height may be appropriate.</p>
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		<p><i>Amend clause F to read:</i></p> <p>F. Proposals for tall buildings outside of the areas identified in clause C-E will not generally be acceptable, and will deliver exceptional public benefits and need to demonstrate how they (in addition to the general principles under clause B-D):</p> <ol style="list-style-type: none"> 1. significantly strengthen the legibility of a town centre or mark the location of a transport interchange or other location of civic or visual significance within the area while relating sensitively to the scale and character of the area; 2. will not undermine the prominence and / or integrity of, existing landmark buildings and tall building clusters. <p><i>Amend Paragraph 42.2 to read:</i></p> <p>Building densely does not always mean building high. There are many ways to deliver <u>on our growth targets with</u> high density developments without adding <u>significant</u> height. <u>Outside the areas identified as having potential to accommodate tall buildings,</u> Proposals incorporating buildings significantly higher than their surroundings will be resisted <u>are likely to be resisted and</u> should therefore provide evidence that other options have been explored to make efficient use of the site without adding <u>significant</u> additional height.</p> <p><i>Amend Paragraph 42.3 to read:</i></p> <p>The impact of a building's height is dependent on its context. An eight-storey building may be perceived as tall in one area, but not in another. We therefore follow a context-based approach <u>to tall buildings</u>, which considers the principal-prevailing height of the surrounding areas <u>impacted</u> by the development. The prevailing context height sets a baseline against which <u>the impacts of</u> any proposals for higher-tall buildings will be considered.</p> <p><i>Amend Paragraph 42.4 to read:</i></p> <p>It is necessary to define what a tall building is as their impact is greater than that of high or large <u>other large-scale</u> buildings, and they therefore require a specific policy approach. A tall building can be created by constructing a new building or extending an existing building upwards. We may require proposals that do not meet the definition of a tall building in the policy but still have a significant impact due to their height, design or context to comply with the relevant criteria for tall buildings in this policy.</p>
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MM42	Policy 43	<p><i>Amend clause B to read:</i></p> <p>B. At the time of writing the plan, the Church Street / <u>Edgware Road Housing Renewal Area</u> and Ebury Bridge <u>Estate Housing Renewal Area</u> housing-estates have been identified for renewal and there are opportunities for taller buildings here where they contribute to the creation of a place with a strong and enhanced character and:</p> <ol style="list-style-type: none"> 1. On Ebury Bridge Estate respect the setting and views from the surrounding Georgian and Victorian terraces within the adjacent conservation areas; 2. On Church Street / <u>Edgware Road Housing Renewal Area</u> Estate are the main east-west route and the commercial focus for the area; and are delivered in the heart of the regeneration scheme as part of a comprehensive approach <p><i>Amend paragraph 43.1 to read:</i></p> <p>We are ambitious in our plans to deliver more affordable housing in Westminster; a significant opportunity to contribute to this delivery is on existing estates designated for renewal. The housing renewal programme offers opportunities to deliver new high quality homes for our residents, with new green open space and community facilities. Housing estate renewal is inherently complicated, particularly in terms of viability because of the responsibilities to decant and return existing residents and the 50% affordable housing targets on public land set by the London Plan. The Westminster Building Height Study (2019) identified scope for taller buildings on the Church Street / Edgware Road <u>Housing Renewal Area</u> and Ebury Bridge <u>Estate Housing Renewal Area</u> estates, however this policy does not direct appropriate heights for the estates. Prescriptively indicating appropriate heights here may preclude the design solutions necessary to facilitate the comprehensive public benefits that large estate-wide development can deliver, including the significant contribution to the strategic priority for more affordable housing in Westminster. This does not, however, mean that the heights for housing renewal areas are limitless – we will expect new buildings to be of an appropriate scale for their local context and applicants will demonstrate how the proposal adheres to clauses A –D <u>and B</u> of Policy 42.</p> <p><i>Amend paragraph 43.2 to read:</i></p> <p>At present only Church Street/Edgware Road <u>Housing Renewal Area</u> and Ebury Bridge <u>Estate Housing Renewal Area</u> estates have been identified for housing renewal, however, other housing estates may be identified as suitable for renewal in future.</p>
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IMPLEMENTATION AND MONITORING

Ref.	Section of plan	Proposed modification
MM43	Land use swaps, Page 174	<p>The City Plan protects almost every land use in one way or another throughout the city. Floorspace can be better protected when it can be transferred to another site as part of estate management or dual site developments. <u>This approach can avoid lengthy marketing exercises leaving floorspace vacant where it can accommodate a different use if the original land use is satisfactorily re-provided elsewhere.</u> Therefore, a system of land use swaps may be appropriate in some <u>the following</u> 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.</p> <p><u>1. the sites are in the vicinity of each other;</u> <u>2. there is no net loss of floorspace which is protected by other policies in the Plan across the sites taken as a whole;</u> <u>3. the uses are appropriate within each area;</u> <u>4. any residential accommodation is of a higher quality than could have been achieved without the land use swap.</u></p> <p><u>The applications for all sites must be submitted at the same time and must be accompanied by a full schedule of the existing and proposed floorspace including the following:</u></p> <ul style="list-style-type: none"> <u>a) the floorspace of each use (Gross Internal Area) proposed for each site, and for all of the sites taken as a whole;</u> <u>b) in the case of residential floorspace, the breakdown of floorspace provided in accordance with (a) by the tenure, unit floorspace, and the number of bedrooms of each unit, and the total floorspace for all of the sites taken as a whole; and</u> <u>c) calculations of any floorspace shortfalls being met by a payment in lieu.</u> <p><u>If agreed, the sites subject to the land use swap will be treated as though the development is on a single site, including for consideration of viability (the sites should be within sufficient proximity to one another that there is no significant differential in site value) and all elements of the scheme are to be completed within a time frame agreed by the council.</u></p>
MM44	New paragraph in Implementati	<p><u>Transition of existing mixed-use credits</u></p> <p><u>Mixed use residential credits registered under the 2016 City Plan policy S1 may continue to be used to</u></p>

	on chapter, page 174	<p><u>offset the affordable housing requirements of Policy 9 in the Central Activities Zone where the floorspace registered is affordable housing.</u></p> <p><u>All conditions agreed at the time of registration of the original credit regarding their drawdown will still apply, as will anything previously agreed in a Section 106 legal agreement relating to the credit.</u></p>
MM45	New paragraph in Implementation on chapter, page 174	<p><u>Early delivery of off-site affordable housing</u></p> <p><u>As set out in paragraph 9.13, the early delivery of affordable housing floorspace may in some circumstances count towards future requirements for affordable housing triggered by Policy 9. This mechanism may only be used as part of wider estate regeneration proposals and any affordable housing delivered must be used in full for the estate on which it is delivered i.e. the affordable housing cannot be 'banked' or traded to offset affordable housing requirements on other sites.</u></p> <p><u>Legal agreements will be used to:</u></p> <ul style="list-style-type: none"> <u>ensure that the intention to use the affordable housing as a contribution to another named site is agreed by the council at application stage for the affordable housing;</u> <u>ensure the market housing cannot be occupied until the affordable housing is complete and transferred to a Registered Provider, where applicable.</u>
MM46	Monitoring page 174	<p>Monitoring</p> <p>The council will monitor the implementation of City Plan policies to ensure that the objectives and targets within the Plan (as well as the programme for infrastructure set out in the IDP) are met. Through the Integrated Impact Assessment (IIA), the annual Authority Monitoring Report (AMR) and Westminster's Monitoring Framework we will keep economic, social and environmental trends and risks under review.</p> <p>The table opposite sets out Westminster's key monitoring indicators which will be used to monitor success towards meeting the objectives in this plan. <u>If the trigger points are reached this does not necessarily mean the policy is failing. Where no trigger is listed, All</u> Key Performance Indicators will be reviewed annually <u>against through</u> the Authority Monitoring Report <u>(AMR) to ascertain trends in how the policies are operating and if the Plan and spatial objectives are being achieved.</u></p>
MM47	New paragraph under 'Monitoring' section, page 174	<p><u>Review</u></p> <p><u>As required by national policy the City Plan will be subject to a full review to ascertain if amendments are required five years after adoption and every five years thereafter.</u></p> <p><u>The findings of the AMR will inform the review and if the majority of policies are deemed to be performing well it may be the case that no action is required. However, if key policy objectives are failing e.g. housing</u></p>

		<u>delivery is lower than the annual target or air quality objectives are not achieved this may indicate amendments to policy are required.</u>
MM48	KPI Table	<i>Replace as set out below</i>

Key Performance Indicators		City Plan objectives	Data source	Trigger for review/ review mechanism
1	Delivery of new homes (floorspace, units by size, <u>type</u> and tenure) against target of 4,495 985 new homes per year for the first ten years of the Plan period and 22,222 20,685 homes overall up to 2040.	1,9	Westminster City Council	Delivery is ten per cent below target for three consecutive years. <u>Review the SHMA for delivery of all accommodation types within five years.</u>
2	Delivery of affordable homes (floorspace, units and location of delivery) against target of at least 35% of all new homes delivered	1,9	Westminster City Council	Total number of new affordable homes does not meet target after five three years
3	Delivery of homes through the Affordable Housing Fund (floorspace and units)	1,9	Westminster City Council	
4	Delivery of accommodation for elderly people (floorspace and units)	1,9	Westminster City Council	Review the SHMA for all accommodation types within five years.
54	<u>Number of family sized homes delivered</u>	<u>1</u>	<u>Westminster City Council</u>	<u>Less than 25% across the city</u>
65	<u>Net change in Class E floorspace across CAZ, Opportunity Areas, and town centre hierarchy</u>	<u>2, 3, 9</u>	<u>Westminster City Council</u>	
5	Delivery of office floor space across the CAZ and opportunity areas	2,9	Westminster City Council	Net reduction in floor space
6	Delivery of town centre floor space by type within the town centre hierarchy and CAZ	2,3,9	Westminster City Council	Net reduction in floor space
76	Delivery of C1 Hotel floorspace	2,3,9	Westminster City Council	Net reduction in floor space
87	Loss of public houses	3,4	Westminster City Council	15% loss of current number <u>over 5 years</u>
98	Hot food takeaways permitted within 200m of a school	9	Westminster City Council	Any permissions granted

109	Change in land uses in the Special Policy Areas (SPAs)	3,4,6,9	Westminster City Council	
140	Delivery of social and community floorspace	4,6,9	Westminster City Council	Annual <u>Review</u> against IDP
131	Change in number of jobs by sectors and levels of worklessness	2,3,4	Westminster City Council	Net loss in total jobs and or increase in levels of worklessness
124	Employment, skills and training opportunities secured through Section 106 contributions	2,3,4	Westminster City Council	Regular review with Westminster City Council employment service
2613	Delivery of walking and cycling infrastructure schemes	5,9	Westminster City Council	Review against IDP
2714	Installation of electric vehicle charging points by type	5,9	Westminster City Council	<u>Review against IDP</u>
2815	Number of applications approved for residential development without car parking outside of parking zones B & F and impact on on-street parking stress <u>Number of applications approved for residential development without on- or off-site car parking in an area of existing high parking stress.</u>	5,9	Westminster City Council	
2916	Delivery of car and cycle parking spaces	5	Westminster City Council	
31	Capacity of new waste and recycling facilities	7,8	Westminster City Council	
17	<u>Number of developments of thresholds set out in policy achieving BREEAM excellent (or equivalent) Standard</u>	<u>6,7,8</u>	<u>Westminster City Council</u>	
1518	Noise complaints received	7,8	Westminster City Council	
3019	Applications that include renewable technologies	7,8	Westminster City Council	
3220	Applications granted planning permission against Environment Agency advice on flood risk	7,8	Environment Agency	No more than 1% of applications permitted
3321	Reduction of NOx and carbon dioxide emissions , and particulate matter (PM _{2.5} and PM ₁₀) concentration against national and regional Air Quality targets	7	DEFRA	
3292	<u>Reduction of carbon dioxide emissions (total end user and per capita) by local authority area, as reported by</u>	<u>3</u>	<u>Westminster City Council</u>	<u>Strategic net loss</u>

	<u>Department of Business Environment and Industrial Strategy (BEIS)</u>			
<u>3423</u>	Net change in Sites of Importance for Nature Conservation (SINCs) and designated open space	8	Westminster City Council & GLA	Deterioration in quality or net loss
<u>4224</u>	Delivery of play space in areas of play space deficiency	6,8,9	Westminster City Council	
<u>3525</u>	Improvements to parks, play areas and other open spaces	6,8,9	Westminster City Council	Review against IDP
<u>3626</u>	Number of open spaces awarded the Green Flag Award	8	Green Flag Awards Website	
<u>3727</u>	Applications incorporating living walls and roofs	8,9	Westminster City Council	
<u>3428</u>	<u>Capacity of new waste and recycling facilities</u>	<u>7,8</u>	<u>Westminster City Council</u>	
<u>3829</u>	<u>Amount, type and destination of waste exported from Westminster.</u>	<u>6, 7, 9</u>	<u>Waste Data interrogator. In line with tables in Appendix F of the Waste Data Study (2020) and thresholds agreed by the London Waste Planning Forum</u>	<u>An increase in waste exports by the following amounts will trigger engagement with recipient waste planning authority:</u> <u>• 5,000 tpa non-hazardous waste (LACW and C&I)</u> <u>• 10,000 tpa inert waste (CD&E)</u> <u>• 100 tpa hazardous waste</u>
<u>4630</u>	Delivery of public realm schemes	5,8,9	Westminster City Council	Review against IDP
<u>4831</u>	Number of designated heritage assets <u>completely demolished/lost.</u>	10	Westminster City Council & Historic England	No loss

19	Number of listed buildings, unlisted buildings of merit or non-designated heritage assets completely demolished.	10	Westminster City Council	Listed building consents for demolition. Committee reports referencing unlisted buildings of merit or non-designated heritage assets demolished
20 32	Number of planning applications approved and refused with a Heritage Impact Assessment for development impacting on the Outstanding Universal Value of the World Heritage Site	10	Westminster City Council	Database of applications impacting on the World Heritage Site
21 33	Number of applications called in by the Secretary of State in relation to any development that may have an impact on the Outstanding Universal Value of the World Heritage Site <u>or its setting.</u>	10	Westminster City Council	Number of applications called in
22 34	Number of heritage assets at risk and removed from the register <u>or with solution agreed</u>	10	Historic England	Less than 1% of total number of <u>listed buildings on register and no conservation areas identified as at risk assets</u>
23	Harm or unauthorised works to listed buildings	10	Westminster City Council	Enforcement action, prosecution on unauthorised works to listed buildings, planning contravention notices
24	Impact on key views	10	Westminster City Council	Number of breaches of height thresholds within viewing corridors, protected vistas, strategic views
25 35	Effective policy for the World Heritage Site <u>through production of updated Management Plan as 'living document' with regular review mechanism</u>	10	World Heritage Committee	<u>Production of updated Management Plan as 'living document' with regular review mechanism and</u> Removal of the World Heritage Site from the annual reporting requirements of the World Heritage Committee
17 36	Utility infrastructure improvements and development	8,9	Westminster City Council	Review against IDP

APPENDICES

Ref.	Section of plan	Proposed modification
MM49	Appendix 1	<i>APPENDIX 1 to be replaced entirely – see below</i>
MM50	Appendix 2	<i>APPENDIX 2 to be removed entirely</i> <i>Subsequent renumbering of Appendix 3 to Appendix 2</i>

Appendix 1: Westminster's Housing Trajectory (in accordance with MM49)

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

Area	Type	Delivery Phase	Net Housing Units
Paddington Opportunity Area	Deliverable	1-5	108 <i>Includes development of the following site:</i> <ul style="list-style-type: none"> • North Wharf Road
	Developable	6-10	501
		11-15	400
Victoria Opportunity Area	Deliverable	1-5	385 <i>Includes development of the following sites:</i> <ul style="list-style-type: none"> • New Scotland Yard • Stockley House
	Developable	6-10	75
		11-15	330
Tottenham Court Road Opportunity Area	Deliverable	1-5	87 <i>Includes development of the following site:</i> <ul style="list-style-type: none"> • Tottenham Court Road Elizabeth Line Station (Oxford Street/ Dean Street)

	Developable	6-10	-
		11-15	-
North West Economic Development Area	Deliverable	1-5	429 <i>Includes development of the following sites:</i> <ul style="list-style-type: none"> • Warwick Community Hall, Harrow Road • Westmead, Tavistock Road • Jubilee Sports Centre, Caird Street
	Developable	6-10	176
		11-15	341
Church Street / Edgware Road Housing Renewal Area	Deliverable	1-5	1,216 <i>Includes development of the following sites:</i> <ul style="list-style-type: none"> • 283-329 Edgware Road (West End Gate) • Paddington Green • Capland Street, Bedlow Close and Luton Street • Parsons House • Lisson Arches
	Developable	6-10	775
		11-15	735
Ebury Bridge Housing Renewal Area	Deliverable	1-5	96
	Developable	6-10	326
		11-15	-
North Westminster	Deliverable	1-5	1,089 <i>Includes development of the following sites:</i> <ul style="list-style-type: none"> • St John's Wood Road/ Lodge Road • Whiteleys Centre, Queensway • Dora House, St John's Wood Road • St John's Wood Barracks, Ordnance Hill • Bayswater Road/ Queensway/ Consort House/ Fosbury Mews • Marble Arch/ Edgware Road/ Bryanston Street • Tollgate Gardens Estate
	Developable	6-10	216
		11-15	280
Central Westminster	Deliverable	1-5	765 <i>Includes development of the following sites:</i> <ul style="list-style-type: none"> • Park Crescent/ Portland Place

			<ul style="list-style-type: none"> • 22 Hanover Square • Aybrook Street Car Park • 87-89 Cleveland Street
	Developable	6-10	29
		11-15	70
South Westminster	Deliverable	1-5	1,531 <i>Includes development of the following sites:</i> <ul style="list-style-type: none"> • Old War Office, Whitehall • Ergon House, Horseferry Road and 9 Millbank • Millbank Complex • First Chicago House, Long Acre • Palace Street/ Buckingham Gate • Arundel Great Court, Surrey Street • Castle Lane/ Palace Street • Chelsea Barracks
	Developable	6-10	388
		11-15	420
Windfalls	N/A	6-10	2,500
	N/A	11-15	2,500
TOTAL DELIVERABLE HOUSING SUPPLY (2020-25)		1-5	5,706
TOTAL DEVELOPABLE HOUSING SUPPLY (2025-35)		6-10	4,986
		11-15	5,076
TOTAL HOUSING SUPPLY (2020-2035)		1-15	15,768

GLOSSARY

Ref.	Section of plan	Proposed modification
MM51	Air Quality Neutral	<u>An Air Quality Neutral development is one that meets, or improves upon, the air quality neutral benchmarks published in guidance from the GLA. The benchmarks set out the maximum allowable emissions of NOx and Particulate Matter based on the size and use class of the proposed development. Separate benchmarks are set out for emissions arising from the development and from transport associated with the development. Air Quality Neutral applies only to the completed development and does not include impacts arising from construction, which should be separately assessed in the Air Quality Assessment</u>
MM52	Carbon Neutral / Zero Carbon	<u>Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.</u>
MM53	Context height	<u>Context height has been taken as the typical or prevailing height within an area, with high and tall buildings considered as an exception to the context rather than defining the context itself.</u>
MM54	Gross floorspace	Method of assessing the extent of building (or land) occupied by a use. This should be measured as Gross Internal Area in accordance with the RICS Code of Measuring Practice, or subsequent replacement professional guidance, but excluding the following areas: — voids in atria; — internal lightwells; — double or triple height areas should be measured only once; — screened or unroofed plant areas, plant rooms, substation rooms, and other operational voids not reasonably capable of commercial or residential use; — internal and external car and cycle parking areas and associated facilities; — servicing bays, vehicle circulation and areas exclusively reserved for refuse and recycling storage and handling.
MM55	Zero emissions	<u>Activity that causes no release of air pollutants and carbon dioxide or other greenhouse gases.</u>

Figure 14: Housing Trajectory (in accordance with MM10)

