

#	<u>Respondent</u>	<u>Position</u>	<u>Summary</u>	<u>Council response</u>
01	Katherine Lubar (Resident)	Support	<ul style="list-style-type: none"> • Suggests that there needs to be oversight of every application so that premises that serve the local communities are not lost 	<ul style="list-style-type: none"> • Support welcomed
02	City of London Corporation	Support	<ul style="list-style-type: none"> • Considers that retaining management of change of use is essential to the CAZ's internationally important office clusters and therefore support the proposed Direction • Note that in particular, the central part of the CAZ contains unique international and national uses that drive footfall 	<ul style="list-style-type: none"> • Support welcomed
03	The Coal Authority	No comments	<ul style="list-style-type: none"> • No specific comments to make on this consultation 	<ul style="list-style-type: none"> • Noted
04	HNL Sustainable Places	No comments	<ul style="list-style-type: none"> • No specific comments, but request to be consulted if further changes are proposed 	<ul style="list-style-type: none"> • Noted
05	Port of London Authority	No objection	<ul style="list-style-type: none"> • No objection to the proposed direction 	<ul style="list-style-type: none"> • Noted

06	Fitzrovia West Neighbourhood Forum	Support	<ul style="list-style-type: none"> • The Article 4 Direction would greatly assist in achieving policies and preserving character of the area • Any changes in use to C3 would reduce the range of services available in Fitzrovia • The changes would likely be at ground floor which is low environment quality facing onto main roads with low daylight and poor air quality • Active street frontages could be gradually eroded through the new right • Any housing provided through the new right would tend to be poor quality 	<ul style="list-style-type: none"> • Support welcomed
07	Historic England	Support	<ul style="list-style-type: none"> • Supports the proposed direction, which will allow suitable assessment of the contribution of office buildings through the planning process to the character and vitality of the areas of the borough in question 	<ul style="list-style-type: none"> • Support welcomed
08	Raymond Davis (Owner of Burlington Arms)	Support	<ul style="list-style-type: none"> • Support the council's efforts to prevent the 'hollowing out' of central London which would occur if too many businesses are lost to residential 	<ul style="list-style-type: none"> • Support welcomed
09	Greater London Authority	Support	<ul style="list-style-type: none"> • Fully support the Article 4 Direction as Westminster's CAZ plays a vital economic role in the agglomeration of office, retail, culture and leisure functions in the CAZ • The Direction will help to support the recovery and safeguard the future sustainability of the CAZ and its nationally significant offices, retail, cultural and leisure activities. 	<ul style="list-style-type: none"> • Support welcomed

			<ul style="list-style-type: none"> • It will support the contribution of this area to London's economy and employment, and the prosperity of the UK nation as a whole 	
10	London First	Support	<ul style="list-style-type: none"> • Fully support the Article 4 Direction • View is that Class E PDR has been a short-termist intervention that risks serious harm to economic health of towns and cities – which is intensified in the CAZ due to high residential land values • Peripheral office space that can be lost to residential is best determined through the normal planning process – which does not prevent these opportunities coming forward 	<ul style="list-style-type: none"> • Support welcomed
11	Knightsbridge Neighbourhood Forum	Support	<ul style="list-style-type: none"> • The majority of commercial units in Knightsbridge (both in the International Centre and the Strategic Cultural Area) are below the 1,500sqm threshold and are not listed, making them vulnerable to residential conversion under the new right – the Article 4 Direction is therefore supported • Loss of commercial units to residential could undermine the status of the International Centre and Strategic Cultural Area and its attractiveness to high end occupiers • A loss of the critical mass of commercial uses in the area will be contrary to City Plan policy 14 and lead to unacceptable adverse impacts, contrary to the NPPF 	<ul style="list-style-type: none"> • Support welcomed

12	Theatres Trust	Support	<ul style="list-style-type: none"> Article 4 Direction supported in helping maintain the role of the CAZ, including Theatreland as a vibrant and mixed use strategic commercial cluster 	<ul style="list-style-type: none"> Support welcomed
13	TFL Spatial Planning	Support	<ul style="list-style-type: none"> Supportive of the proposals from a transport perspective The high provision of sustainable transport in Westminster supports commercial development Residential conversions should be considered on a case by case basis The direction is in compliance with London Plan policies 	<ul style="list-style-type: none"> Support welcomed
14	Thames Water	Support	<ul style="list-style-type: none"> Note that change of use from Class E to residential can have significant impacts on the flow of water into the sewer network, which could result in flooding issues The direction ensures that planning permission is required and Thames Water can be consulted 	<ul style="list-style-type: none"> Support welcomed
15	Iceni Futures on behalf of Imperial College London	Object	<ul style="list-style-type: none"> Land holdings at St Mary's and in Knightsbridge should be excluded, to ensure the Direction applies to the smallest geographical area possible as required by the NPPF. Note that much of their land holdings fall within Class F1(a) (Education) or sui generis student accommodation that are not vulnerable to the new permitted development right; State that only small amounts of Class E floorspace complementary to the education function exist, which should not be considered a 'Class E cluster' that merits protection, and that if lost, would not 	<ul style="list-style-type: none"> This does not provide strong justification for amending the boundary of the Article 4 Direction to exclude Imperial College's land holdings. The CAZ represents a coherent boundary that includes a diverse mix of mutually supportive uses including commercial, cultural, and educational uses, all of which contribute to its strategic functions and appeal, as recognised by the recently adopted policy framework in the City Plan and the London Plan and supported by multiple responses to this consultation.

			<p>undermine the vitality and viability of the CAZ or its commercial function; and</p> <ul style="list-style-type: none"> • What class E floorspace does exist is unlikely to be converted to residential uses as it would require the privatisation of the buildings and their effective severing from the Estate, raising practical challenges such as requiring residents to travel through and within college educational buildings before they could access their residential unit. 	<ul style="list-style-type: none"> • The Direction as proposed seeks to ensure the areas strategic functions are not compromised by the new permitted development rights, and excludes areas that clearly provide no clusters of Class E floorspace (i.e. the Royal Parks). As acknowledged within their submission, some Class E floorspace does exist within their land holdings, and this provides a complementary role to wider educational uses. Such benefits, which support the strategic functions of the CAZ, and which residential conversion could undermine, therefore justifies its inclusion within the Direction. • Furthermore, given the scale of the CAZ and the diverse mix of uses within it, to remove every instance of non-Class E floorspace is neither possible nor proportionate. • Finally, it should be noted that the Direction does not represent an outright ban on conversion of any Class E floorspace to residential within the CAZ – simply that such proposals should be subject to full consideration through the determination of a planning application
16	WPA	Support	<ul style="list-style-type: none"> • Agree that the uncontrolled introduction of housing throughout the CAZ could significantly undermine the strength and character of the district • The economic benefits of the CAZ are of national importance, and its primary strategic functions are commercial in nature 	<ul style="list-style-type: none"> • Support welcomed

			<ul style="list-style-type: none">• A short-term reduction in commercial activity as a result of the pandemic should not to lead to permanent losses of commercial stock to residential, and associated jobs and expenditure – this would detract from City of Westminster’s world class economic, social, cultural and leisure role• Introducing new residential to commercial areas can add additional constraints to future commercial growth due to the need to respect residential amenity – balancing these uses is therefore best addressed through a fine grained case by case approach through the determination of planning applications	
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